In The Matter Of:

Bostock v.
Clayton County

Colin Slay September 10, 2021 Video Deposition

Regency-Brentano, Inc.
13 Corporate Square
Suite 140
Atlanta, Georgia 30329
404.321.3333



REGENCY-BRENTANO, INC. Certified Court Reporters

Min-U-Script® with Word Index

```
1
              IN THE UNITED STATES DISTRICT COURT
              FOR THE NORTHERN DISTRICT OF GEORGIA
 2
                         ATLANTA DIVISION
 3
    GERALD LYNN BOSTOCK,
 4
                 Plaintiff,
 5
                                  CIVIL ACTION FILE
             vs.
 6
                                  NO. 1:16-cv-01460-ELR-WEJ
    CLAYTON COUNTY,
 7
                 Defendant.
 8
 9
                Videotaped deposition of COLIN SLAY,
10
         taken on behalf of the Defendant, pursuant to
11
12
         Notice and agreement of counsel, in accordance
13
         with the Federal Rules of Civil Procedure,
14
         before Cynthia B. Gatewood, Certified Court
15
         Reporter, at 100 Galleria Parkway, Suite 1600,
16
         Atlanta, Georgia, on the 10th day of September
17
         2021, commencing at the hour of 10:07 a.m.
18
19
20
21
                      REGENCY-BRENTANO, INC.
                    Certified Court Reporters
22
                       13 Corporate Square
                            Suite 140
23
                      Atlanta, Georgia 30329
                          (404) 321-3333
24
25
```

Regency-Brentano, Inc.

1	INDEX TO EXAMINATIONS			
2	EXAMINATION		PAGE	
3	Cross-Examina	ation by Mr. Buckley	5	
4				
5		INDEX TO EXHIBITS		
6	PLAINTIFF'S EXHIBIT	DESCRIPTION	PAGE	
7	<u>P-3</u>	2007 Memorandum of Understanding	71	
9	P-10	CASA GAL Program Cash Controls Audit Final Report May 2013	144	
10	<u>P-17</u>	Letter of intent to terminate	149	
11	<u>P-19</u>	1/17/13 Email from Shawn Black to John Johnson	81	
12 13 14	<u>P-20</u>	Memorandum dated 6/7/13 from Colin Slay regarding misuse of Guardian Ad Litem funds by Gerald Bostock	106	
15 16	<u>P-21</u>	Memorandum dated 6/12/13 regarding documents requested by the DA's office	194	
17	<u>P-22</u>	Investigative Summary dated 12/6/13 by Allen Crenshaw	198	
18	<u>P-23</u>	Case Report	199	
19 20	<u>P-24</u>	Investigative Summary dated 12/12/13 by Allen Crenshaw	200	
21	P-25	Investigative Summary dated 1/31/14 by Allen Crenshaw	202	
22 23	<u>P-26</u>	Investigative Summary dated 1/31/14 by Allen Crenshaw	204	
24	<u>P-27</u>	Investigative Summary dated 12/6/13 by Allen Crenshaw	204	
25				

1		INDEX TO EXHIBITS (Continued)	
2			
3	PLAINTIFF'S EXHIBIT	DESCRIPTION	PAGE
4	<u>P-28</u>	Email chain dated 12/4/13 between Colin Slay and Dennis	205
5		Baker, Subject: Bostock Investigation	
6	P-29	Emails dated 12/4/13 from Colin	213
7	<u>F-25</u>	Slay to Dennis Johnson	213
8	P-30	Email dated 6/16/20 from Colin Slay to Steve Teske, Subject:	215
9		Audit Report	
10	<u>P-31</u>	Email dated 6/17/20 from Colin Slay to Juvenile Court, Subject:	216
11		Mr. Bostock's Lawsuit	
12	<u>P-32</u>	Performance Evaluation Report for the period 1/13/09 - 1/12/10	86
13	P-33	Performance Evaluation Report	88
14	<u>P=33</u>	dated 1/6/11	00
15	<u>P-34</u>	Memorandum dated 4/29/13 from Colin Slay to Gerald Bostock,	93
16		Subject: 4-Month Performance Review	
17	D 25	Memorandum dated 10/23/08 from	221
18	<u>P-35</u>	John Johnson to Gerald Bostock, Subject: Financial Disclosure	221
19			
20	<u>P-36</u>	2013 Memorandum of Understanding	168
21	<u>P-37</u>	2018 Memorandum of Understanding	175
22	<u>P-38</u>	2017 Memorandum of Understanding	179
23			
24			
25			

Regency-Brentano, Inc.

```
1
    APPEARANCES OF COUNSEL:
 2
    On behalf of the Plaintiff:
 3
           EDWARD D. BUCKLEY III
           THOMAS J. MEW IV
 4
           Attorneys at Law
 5
           Buckley Beal LLP
           600 Peachtree Street NE
           Suite 3900
 6
           Atlanta, Georgia 30308
 7
           Phone: (404) 781-1100
           Fax:
                   (404) 781-1101
 8
           Email: edbuckley@buckleybeal.com
 9
    On behalf of the Defendant:
10
           MICHAEL M. HILL
11
           WILLIAM H. BUECHNER, JR.
           Attorneys at Law
12
           Freeman Mathis & Gary LLP
           100 Galleria Parkway
13
           Suite 1600
           Atlanta, Georgia 30339
14
           Phone: (770) 818-0000
           Fax:
                  (770) 937-9960
15
           Email: mhill@fmglaw.com
16
    Videographer:
17
           Mr. Henry Stewart
           Litigation Technology Services
18
           Phone: (770) 554-1633
19
20
    Also Present:
21
           Mr. Gerald Bostock
22
23
                (Disclosure, as required by the Georgia
24
         Board of Court Reporting, was made by the court
         reporter, a written copy of which is attached
25
         hereto.)
```

Regency-Brentano, Inc.

5

1 (VIDEO CAMERA ON.) 2 THE VIDEOGRAPHER: Today is September 10th, The time is now 10:07 a.m. We're on the 2021. 3 record. Will the court reporter please swear in 4 5 the witness. 6 COLIN SLAY, 7 having been first duly sworn, was examined and 8 testified as follows: 9 CROSS-EXAMINATION BY MR. BUCKLEY: 10 Good morning, Mr. Slay. My name is Ed 11 Q. 12 Buckley. 13 Α. Good morning. And I represent Gerald Bostock, and I am 14 Q. going to take your deposition here today. Have you 15 ever had your deposition taken before? 16 17 Α. I have not. Okay. Congratulations. 18 0. So you are under 19 penalty of perjury. You understand those penalties are 20 criminal penalties; right? Yes, sir. 21 Α. 22 Q. Okay. So you are obliged to tell the truth 23 here --24 Α. Yes, sir. 25 -- in response to my questions. I will be Q.

Regency-Brentano, Inc.

6

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

- A. Yes, sir.
- Q. And just as you're doing right now, if you'll make sure your answers are verbal answers, yes, no, or if you need to explain, that's fine. But uh-huh and huh-uh or a nod or a shake of the head --
- 10 A. Yes, sir.
- 11 Q. -- they don't cut it in a deposition. Okay?
- 12 A. Right.

5

6

7

8

9

13

14

15

16

17

19

20

21

- Q. Our court reporter needs to take down a transcript of your testimony, so we're agreeable on that. And I will assume, unless you say, "I don't understand your question," that you do understand it and that your answer is responsive to the question.
- 18 A. Yes, sir.
 - Q. All right? Okay. So are you laboring under any disability or taking any medication that would render your memory less than accurate?
 - A. No, sir.
- Q. Okay. Have you discussed your testimony in this case with anybody other than the two lawyers who are present in this deposition?

1 A. No, sir.

- Q. Okay. And I mean anybody. I mean your spouse, your best friend, anybody who works in Clayton County government, anyone like that.
- A. Not my testimony per se. I mean, I've had conversations with the attorneys, and Judge Teske has been a part of those conversations.
- 8 Q. Okay.
 - A. But --
- Q. Let's carve that out a little bit because

 I'm not going to ask you about any communications you
 had with --
- 13 A. Right.
 - Q. -- the lawyers. Those are privileged. Did you have any separate discussions with Judge Teske either concerning your testimony or, more generally, the facts surrounding the case that we're here about today at any time from the time that you all started investigating Mr. Bostock going forward?
 - A. Well, obviously, I had conversations with Judge Teske and John Johnson as a part of the investigation and the work that went into that. And, you know, even following Mr. Bostock's termination, there were ongoing conversations about the aftermath and dealing with that.

8

1 Okay. We're going to get into some of Q. 2 those -- well, all of those conversations --Yes, sir. 3 Α. Okay? So hold that thought. 4 Q. -- today. 5 Have you had -- other than Teske and Johnson, have you 6 had conversations with anybody else, separate from the 7 lawyers in Clayton County government, concerning Mr. Bostock's -- the events leading up to his 8 9 termination or the events after his termination? The only conversation I had -- I mean, 10 Α. obviously my wife knew I was coming here to give the 11 12 deposition today, but not about testimony or not really about the case in any way. 13 Okay. All right. So I just want to be 14 Q. clear that the only two people that you've talked to, 15 other than your spouse, the only two people in Clayton 16 17 County government that you've talked to about this matter are Teske and Johnson? 18 19 Α. Yes, sir. 20 All right. Now, one of the things I forgot 0. to tell you, in the course of your deposition if you 21 remember something that it would add to any of your 22 23 answers to your questions, then, you know, please tell 24 me.

25

Okay.

Α.

9

1 You know, and I'll just give you a Q. Okay. 2 for instance. You've discussed some of the reasons for Mr. Bostock's termination with Sabrina Crawford; right? 3 Yeah, during the -- yeah, back then when 4 Α. 5 that happened, yes. All right. So if you had remembered that --6 Q. 7 Α. Right. 8 -- rather than me reminding you during your Q. 9 testimony, you would be able to raise your hand and say, "Hey, Mr. Buckley, I just remembered that we also 10 talked to Sabrina Crawford about this." So but now my 11 12 having reminded you of it, was that in a meeting at her 13 car dealership with Mr. Teske at or close to the time that Mr. Bostock was terminated? 14 Α. It was. 15 Have you had any other conversations, other 16 Q. 17 than that meeting with Sabrina Crawford, concerning Mr. Bostock's termination? 18 19 Α. Not that I recall. 20 Okay. All right. Again, if you recall Q. it --21 22 Α. Right. 23 -- maybe it was a quick phone call, maybe Q. 24 you saw her at a meeting and you had a couple of words,

I'd like you to tell me. So just try -- today we want

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

- A. I have spoken to Ms. Crawford a few times since all of that transpired, but it was not about Mr. Bostock.
- Q. Okay. What sort of things have you spoken with Ms. Crawford about since that time?
 - A. She started a nonprofit. It's called Gigi's House. It's for young women who have been sex trafficked. It's sort of a group home for those young women when they've been taken out of the situation.

 And she was having some issues with -- it's located in Lovejoy, Georgia, which is in the county, Clayton County. And she was having some issues with the Lovejoy Police Department, so she reached out. This probably would have been maybe three or four years ago at this point.

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

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

- Q. I see. So the issue that you all were focusing on was these young women who had been sex trafficked and who were living in the home. There were incidents where they would disrupt the home, and then there was a question of whether or how police should be involved in handling those situations?
- A. Correct, or whether or not the young women should be detained.
- Q. Right.

- A. There were a couple of instances where the girls actually left the home, kind of --
- 14 Q. Right.
 - A. -- technically be a runaway, left their abode. In our court, we don't -- it's anti-ethical to our mission to detain a young woman who is a victim, so we were trying to figure out a way that we could get ahold of the situation without having to resort to certainly any kind of long-term detention.
 - Q. Okay. So did any of these young women go through the or use the services of the Clayton County CASA program?
 - A. I can't say for certain. Most of the young women that were housed came from the city of Atlanta or

other counties.

- Q. Okay.
- A. I'm sure there were probably a few that came through that were Clayton -- you know, from Clayton County. And if they had a dependency case pending before the court, then they would have had a CASA assigned to them. That's our practice.
- Q. Okay. So backing up to what we were talking about before this, and I was asking you anybody that you've spoken to about the circumstances surrounding Gerald's termination, were you present when Judge Teske announced to courthouse staff that Mr. Bostock had been terminated?
- A. I don't recall. I know there was a meeting in the -- what we call the resource center. It's a large sort of training room that we use. And I honestly do not recall that meeting at all. I don't know if I was there or if I was on leave when that meeting occurred.
 - Q. Okay.
- A. And back to your previous question about other people that I would have spoken to, I also spoke to the auditors that did the audit of the accounts.

 And we also met with Renee Bright, who was the human resources director. So I just wanted to add that --

Q. Okay.

- A. -- for clarification.
 - Q. Who were the -- can you name the auditors?
 - A. It was Stacey Merritt -- well, I think the actual auditor was Leslie Moore, and then Stacey Merritt was her supervisor. She was or is the director of the Internal Audit unit for the county.
 - Q. Okay. After the -- whether or not you were present at the meeting where Mr. Bostock's termination was announced to courthouse staff, you heard about it afterwards; right?
- A. Yeah, I was aware of it.
 - Q. Okay. Did anybody talk to you about it or talk to you about the reasons Gerald was terminated or that they couldn't imagine that Gerald -- why Gerald would be terminated or any of those things? Did people express opinions about it to you?
 - A. The only conversations I had with anyone in the court about Mr. Bostock would have been Carol Gossett, who was appointed to take his position after he was terminated.
 - Q. Okay.
- A. I had several conversations. I really don't recall anything in detail about Mr. Bostock. It was more about the job --

14

- 1 Q. Right.
- 2 A. -- that she was assuming.
- Q. So I just want to be clear. When you talked to Ms. Gossett -- she's the person that replaced Gerald; right?
- 6 A. Correct.

7

8

9

10

11

12

13

- Q. When you talked to her, it's your testimony that you didn't talk to her specifically about the reasons Gerald was terminated but only about the job duties that she would be assuming?
- A. I'm not going to say I didn't have a conversation with her about the reasons Mr. Bostock was terminated. I don't -- it doesn't stand out to me. I don't recall that per se.
- 15 Q. Okay.
- A. But in the interest of transparency, I don't want to purvey that I didn't have any -- I don't recall that.
- Q. Okay. Here's where -- what we're doing today. We want your best memory.
- 21 A. Right.
- 22 Q. Okay.
- 23 A. Yeah.
- Q. Yeah. If you don't remember, then just say so.

15

1 Α. Okay. 2 Q. And, also, if you don't know. 3 Α. Sure. That answer, if it's a truthful answer --4 Q. 5 Right. Α. 6 -- is fine. Q. 7 Α. Okay. 8 So all right. So I'm just going to -- and Q. 9 you said you talked to Carol Gossett, but you're not clear that you necessarily talked to her about the 10 circumstances of Gerald's termination. Did you talk to 11 12 Leslie Moore or Stacey Merritt about the circumstances 13 of his termination? Not about the circumstances of his 14 termination. My conversation with them was about the 15 results of the audit. 16 17 Q. Okay. Now, one of the results of that audit was that they, Ms. Moore and Ms. Merritt, found the 18 19 memorandum of understanding between the Superior Court 20 of Clayton County and Clayton County CASA to be very, very vague in terms of the handling of funds that went 21 to Clayton County CASA. Is that a fair way of putting 22 23 it? 24 Α. I wouldn't --

Object to form.

MR. HILL:

Colin Slay - September 10, 2021

16

Video Deposition 1 BY MR. BUCKLEY: 2 Q. Go ahead. I wouldn't characterize it that way. Α. 3 think what they stated in the audit was that there 4 5 weren't proper controls in place --6 Q. Okay. 7 -- for the management of those funds for 8 determining, you know, who had authority. There 9 weren't proper accounting practices in place --10 Q. Okay. -- to account for the expenditures, the 11 Α. 12 income, those sorts of things. 13 Q. And that, that -- I'm going to call it the MOU. 14 15 Uh-huh (affirmative). Α. 16 It was a memorandum of understanding. Q. 17 Α. Yes. You're familiar with the document. 18 Q. 19 Α. Yes, sir. 20 Right? You probably reviewed the document Q. in preparation for your deposition, did you? 21 I did. 22 Α. Okay. And so -- and we'll look at it later 23 Q. 24 But that MOU, the only thing it really says about

the handling of money is that, "All fees shall be paid

17

1 to Friends of Clayton County CASA, Inc., Care of Gerald 2 Bostock, Program Coordinator of CASA, Clayton County Juvenile Court, 121 South McDonough Street, Courthouse 3 Annex, Jonesboro, Georgia 30236." That's all it says; 4 5 right? About --6 Α. 7 MR. HILL: Object to the form of the 8 question. 9 BY MR. BUCKLEY: Yeah, go ahead. 10 Q. About the receipt of the monies? Is that 11 Α. 12 what you're asking? 13 Q. Well, about -- yeah, about anything about -well, strike that -- about the receipt of money. 14 That's all it says about the receipt of the money, that 15 it shall be directed to Mr. Bostock; right? 16 17 Α. I think that is right, yes, sir. Okay. And then it also says, in terms of 18 0. 19 the use of the money, "The Clayton County CASA Advisory 20 Board is the recipient of the administrative fee and will use the fees to fund volunteer recruitment, 21 training, and retention." 22 23 Α. Correct. 24 Q. And that's all it says; right? It doesn't 25 give any specifics about the parameters of recruitment,

18

1 training, or retention, or what's an appropriate 2 expenditure versus an inappropriate expenditure. It doesn't get that specific, does it? 3 Α. No, sir. 4 Okay. Now, has that document, since 5 Q. 6 Mr. Bostock was fired, has that document ever been 7 revised, rewritten? 8 Α. It has been amended, I believe, four 9 times --Yeah. 10 Q. -- since then. 11 Α. 12 Q. Okay. 13 Α. It was amended immediately after Mr. Bostock's termination, and then there have been 14 some administrative changes to the document --15 16 Q. Okay. -- I believe two other times. 17 Α. And it's much more specific now than it was 18 0. 19 then concerning the scope of expenditure of those 20 funds. It is. 21 Α. Is that fair? 22 Q. 23 It is, yes. Α. 24 Q. Okay. And it's more specific now than it 25 was then about how -- the scope of duties of the

19

1 program coordinator with respect to those funds; correct? 2 We changed how the money is received. Α. 3 Yes. Q. It's actually received by the court now, 4 5 isn't it? 6 It's received by our clerk's office. Α. It is. 7 Q. Okay. 8 Α. Like all the other fines, fees, you know, 9 other payments the court receives, restitution payments and such, it's received by the clerk's office. 10 11 Q. Okay. Α. They record it, it's deposited into the 12 13 court's account, and then the disbursement of that money is -- there's a process for approving 14 expenditures and the disbursement of the money now. 15 Q. Okay. And so that was one of the things 16 that the auditors were critical of was the lack of 17 guidance provided by the MOU; right? 18 A lack of control. I don't recall 19 Α. 20 necessarily guidance being --21 Q. Okay. -- a particular word they used, but 22 Α. 23 certainly the lack of control. 24 Q. Okay.

25

Α.

Lack of separation of duties in terms of who

20

1 receives and who has --2 Q. Okay. -- authority to expend, those sorts of Α. 3 4 things. 5 Right. And on what they can be spent; Q. 6 right? 7 Α. Yes, sir, I believe so, yeah. 8 Q. Did you ever go to a Clayton County CASA 9 event where alcohol was served? Yeah, I've been to probably one or two. 10 Α. Okay. Did you ever go to any that were 11 Q. 12 outside of Clayton County? 13 Α. I don't know that I've ever been to a CASA event outside the county. 14 15 Do you know if Judge Teske ever went to a Q. CASA event outside of Clayton County? 16 17 Α. I'm not sure. Do you know if he -- you have been to events 18 0. 19 at least where alcohol was served; right? 20 I remember one particular event was at Α. Chili's. I believe it was in the run up to the annual 21 Duck Derby. 22 23 Right. Okay. Q. 24 Α. And I believe it was sort of a volunteer appreciation dinner, and that's the one that I can 25

21

1 remember for sure.

2

4

13

25

- Q. Was the Chili's in Clayton County?
- 3 A. It was, on Mount Zion Parkway, I believe.
 - Q. And alcohol was served at that event?
- 5 A. There were -- I wouldn't say it was served.
- People were ordering, you know, beer and wine and that kind of thing.
- Q. Okay. And you didn't consider that an improper use of CASA funds, at least at that point in time, did you?
- 11 A. I would have absolutely considered it an 12 improper use of CASA funds to pay for alcohol.
 - Q. Are you a teetotaler yourself?
- 14 A. No, sir.
- Q. Okay. And but there is nothing in the MOU
 that says that funds will not be spent on alcohol for
 recruiting events, for instance. There's nothing that
 says that.
- A. There's nothing in the MOU that says that.

 But the county, for instance, the county reimbursement rules, the county will not reimburse employees for alcohol. If we go somewhere on a conference or something and we have a meal and we have a drink, we have to ask for those drinks to be put on a separate

tab that we're responsible for.

r		
1	Q.	Okay. But these funds were not per se
2	county fun	ds.
3	А.	No, they were county funds.
4	Q.	These were funds that were held by CASA;
5	right?	
6	А.	They were held by the Friends of Clayton
7	County CAS.	A, but those
8	Q.	Friends of Clayton County CASA.
9	Α.	Those funds came in through an agreement, a
10	government	agreement.
11	Q.	Right.
12	A.	And so I consider those county funds.
13	Q.	Okay. But you're not giving us a legal
14	opinion he	re today.
15	A.	Absolutely not.
16	Q.	Right.
17	A.	I'm not an attorney.
18	Q.	Okay. Clayton County CASA is a private
19	nonprofit,	is it not?
20	A.	It is.
21	Q.	Okay. So
22	A.	With the express mission to support the
23	Clayton Co	unty CASA program, which is a government
24	program.	
25	Q.	Right. Okay.

23

1 MR. HILL: Just wait. To clarify, are you 2 saying Clayton County CASA or the Friends of Clayton County --3 MR. BUCKLEY: Friends of Clayton County 4 5 CASA. 6 Is a nonprofit, yes. Α. 7 BY MR. BUCKLEY: 8 Q. Okay. Now, my understanding is that there 9 would be a payment in order to have a CASA volunteer serve as a guardian ad litem that would be paid -- a 10 \$500 payment. This is back when -- the MOU that we're 11 12 talking about when Gerald was, you know, the 13 coordinator. 14 Α. Right. That \$500 payment was made to -- was made to 15 Q. 16 Friends of Clayton County CASA? I believe it was in the care of at that time 17 Α. Mr. Bostock, who --18 19 Okay. Q. 20 -- received the money and made the deposit. Α. So -- and I'm reading again the MOU. 21 Q. says, "All fees shall be paid" -- let me back up 22 23 because I want to give context here, and I think you 24 deserve context. It says, "Order for payment of costs of guardian ad litem services will be sent to the

24

1 respective parties by the Clayton County Superior Court 2 and shall include the following payment: Cash and money order are acceptable means of payment. No 3 personal checks will be accepted. However, a check 4 5 drawn on the respective attorney's firm will be 6 accepted for payment. All fees shall be paid to 7 Friends of Clayton County CASA, Inc., care of Gerald 8 Bostock, Program Coordinator," et cetera. 9 So if -- I just want you to walk me through how that occurred. Somebody requires the services of a 10 11 guardian ad litem. They're in court. There's a child 12 who needs a guardian ad litem. Who writes that check? 13 Α. The parents would be responsible, each party, so the mother -- because these were typically 14 divorce cases where there was a custody issue. 15 16 Q. Okay. 17 Α. So each party would be required to pay half of that fee, so \$250 each. 18 19 Okay. And they would write -- they're Q. 20 required by the court to pay the fee. Uh-huh (affirmative). 21 Α. 22 Q. Right? 23 Correct. Α. 24 But the check that they wrote was to Friends Q.

of Clayton County CASA.

25

1 Yeah. Α. 2 Q. Correct? The checks -- the only checks we accepted 3 Α. were from their representing attorneys' firms. 4 5 Q. Okay. So, yes, those checks would be written or a 6 money order would be delivered by the parent or even 7 8 cash at times. 9 What would happen if the check were made out Q. to -- let's say they made a mistake and made it out to 10 the clerk of court. Would you all just not accept the 11 12 check? 13 Α. I don't know that that ever happened, but I would assume whoever was receiving those monies would 14 ask them to re-write the check to the Friends. 15 Right. Okay. So -- and, again, if I 16 Q. 17 understand correctly, Friends of Clayton County CASA is a -- is it a 501(c)(3)? 18 19 Α. I believe so, yes. 20 Okay. Do people who write these checks get 0. a tax deduction for writing these checks? 21 22 Α. I would assume they could. I don't know if 23 they did. 24 Q. All right. Okay. Would anybody other

than -- well, let's see. Was anybody who worked for

26

the court on the Friends of Clayton County CASA board 1 2 at the time Gerald Bostock served as coordinator? An employee serving on the board? 3 Α. Yeah. 4 Q. 5 I don't recall that ever being the case. Α. Okay. And Judge Teske wasn't on the board. 6 Q. 7 Α. No, sir. 8 Okay. The board consisted of private Q. 9 citizens who oversaw the program; right? Correct. 10 Α. And did Mr. Bostock report to that board? 11 Q. 12 Α. He had a reporting responsibility about the 13 activities, specifically around fundraising efforts, the Duck Derby, those sorts of things. But he didn't 14 report to the board in his employment with the county. 15 He reported directly to me. 16 17 Q. So going back to your statement about you would consider the expenditure on alcohol --18 19 Α. Right.

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

A. That's correct.

20

21

22

23

24

25

Q. Okay. But Clayton County CASA is not a

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

A. That's right.

MR. HILL: Object to form.

5 BY MR. BUCKLEY:

- Q. And so it would be the board who would determine what is or is not the proper expenditure of funds normally; correct?
- 9 A. I would say that is correct for funds that 10 they raised outside of the GAL program.
 - Q. Okay. And are you basing what you're saying -- you've given me a nuanced answer. Are you basing that on any document, or is that just your opinion?
 - A. I base that on what has been the long-held policy and practice of the county, that funds that would come in through a county program would be governed under those county rules.
- 19 Q. Okay.
 - A. These were not funds that were raised from outside sources. These were funds that were raised as a part of an ongoing court case. So I very much considered those funds to be government funds. They were held in the nonprofit whose mission was to support the program.

28

1 If a -- let's say some parents are in Q. Okay. 2 court, they're getting a divorce, and the court says, 3 "You need to appoint a guardian ad litem to represent the interests of your child. So, in order to do that, 4 5 you're going to need to write a check to Friends of 6 Clayton County CASA." And the parents said, "We don't 7 want to do that. We don't have the money. We don't 8 want to spent the money," whatever the case may be. 9 Would that child simply be unrepresented? How would that -- how would that work? 10 MR. HILL: Objection, calls for speculation. 11 12 MR. BUCKLEY: Well, he understands the 13 workings of the court better than I do. BY MR. BUCKLEY: 14 15 Q. So go ahead and give me your best answer. Well, and this is completely speculation 16 Α. 17 because --18 Q. All right. 19 Α. -- I was never involved in the superior 20 court cases myself. 21 Q. Right. I would assume that the court has the 22 Α. 23 authority to waive the fee, if you're talking about 24 someone who is truly destitute and can't pay the fee. I think the court's interest would probably be to make

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

- Q. So would Clayton County CASA or Friends of Clayton County CASA be required and expected to provide a guardian ad litem for that child notwithstanding the failure or refusal to pay the fee?
- A. Well, the Friends of Clayton County CASA do nothing to provide guardian ad litems. The Clayton County CASA program, which is --
 - Q. Excuse me. Right.
- A. They would provide that guardian ad litem in any situation where a judge has issued an order doing so.
 - Q. They would do that regardless of whether the parents were able or willing to pay the fee?
- A. Absolutely.

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

- Q. Okay. And the Friends of Clayton County
 CASA paid for that dinner, as far as you know; right?
 - A. As far as I know.
 - Q. Okay.

- A. I don't know for sure.
- Q. And while you don't necessarily view it as a proper expenditure of funds with respect to alcohol, there was nothing in the MOU that expressly prohibited expenditure of funds for alcohol, was there?
- A. No, sir. If the Friends of Clayton County
 CASA out of the separate funds that they raise through
 their fundraising events wanted to provide alcohol,
 that's their business. If the GAL funds, the funds
 collected through the GAL program were used to purchase
 alcohol, I would consider that improper.
- Q. Were the funds that are collected from the GAL program that go to Friends of Clayton County CASA kept -- to your knowledge, were they kept in a separate account from other funds raised by Clayton County CASA, say through the Duck Derby or otherwise?
- A. To my knowledge, Friends of Clayton County
 CASA held three accounts.
 - Q. Okay.
- A. One for the GAL funds. One was sort of their general, I guess, fundraising event, you know,

31

1 where they deposited those sorts of things. And then 2 there was a separate account, I believe, for the Ambassadors Behind CASA, which was sort of an ancillary 3 support organization that helped raise funds. I think 4 5 they focused more on doing things for the children. 6 know they supported like a Christmas like luncheon and 7 gift giveaway, that kind of thing. 8 Let me make sure I get all these right. Q. 9 there's the Ambassadors --Right. We called it the ABC. 10 Α. And those don't sound like court events that 11 Q. the Ambassadors are involved in --12 13 Α. No, it's --14 Q. -- so much as --15 Α. -- completely separate. -- doing things for the kids. 16 Q. 17 Α. Yes. And then what were the other two funds 18 0. 19 you --20 I don't know that it had a name other than Α. Friends of Clayton County CASA. It was their sort of 21 general operating fund. 22 23 Q. Okay. 24 And my understanding is the funds from the Α.

Duck Derby, for instance, that's where those funds

32

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

- Q. Do you know if the Friends of Clayton County CASA general operating fund only had -- you know, was only funded by the \$500 fees that were paid into court or whether there were other fundraising activities that funded that operating account?
- 8 A. No, the --
- 9 MR. HILL: I object to form.
- 10 BY MR. BUCKLEY:

1

2

3

4

5

6

- 11 Q. Go ahead.
- A. The funds raised from the GAL account should have been deposited in that account that was designated for those funds. That was the first account I mentioned.
- 16 Q. That's the general operating fund?
- 17 A. No, sir. That's the GAL account.
- 18 0. GAL account.
- A. I believe it was Friends of Clayton County
 CASA. It was a DBA, and I don't remember if it was
 just called Guardian Ad Litem or GAL. That's where
 those funds were supposed to be deposited.
- 23 Q. GAL. I'm sorry.
- 24 A. GAL, yes, sir.
- 25 Q. Guardian Ad Litem.

33

1 Α. Right. 2 Q. So, to be clear, there was a separate Guardian Ad Litem account expressly for the purpose of 3 funding guardian ad litem activities in the court; 4 5 right? 6 Correct, supporting those, yes, sir. Α. 7 0. And that account was funded by the \$500 fees 8 that would be paid by the parents under the direction 9 of the court. That's right. 10 Α. Okay. And, as far as you know, no other --11 Q. there was no other source of funds for that account 12 13 other than that court ordered fee? There -- to my knowledge, there wasn't. 14 Α. 15 That's --16 Q. Okay. 17 Α. -- the sole funding mechanism for that account, as far as --18 19 So the other -- you know, I forgot to Q. 20 mention a couple of things to you. And I just did it myself, so I apologize. But if you're answering a 21 question and I cut you off in the middle of an answer, 22 that's inadvertent. 23 24 Α. Okay.

25

0.

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

34

1 your answer because I want your answer to be complete. 2 I just think you're finished, and I'm moving on. the same token, if you cut me off, I'll tell you 3 because sometimes you'll anticipate my question; right? 4 5 So if you cut me off, I'll say, "Hey, wait a minute," 6 and I'll finish my question. All right? Are we 7 agreed? 8 Α. Yes, sir. 9 Okay. So, okay. And so in terms of the Q. general operating fund, that's different from the GAL 10 account; right? 11 12 Α. Correct. 13 Q. And the Friends of Clayton County general operating account was funded, to your knowledge, 14 through separate fundraising? 15 That's correct. 16 Α. 17 Q. Okay. Such as the Duck Derby. There were some 18 Α. 19 other, you know, events that would happen. 20 believe people, you know, just citizens would make a single donation or that kind of thing. 21 Okay. And do you have the same concerns 22 Q. 23 about expenditure of funds for alcohol, for instance, 24 out of the general operating fund? Is that -- do you

have concerns that that's inappropriate too in the

scope of volunteer recruiting, training, and retention?

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

- A. But at the same time, to answer your question directly, that would be a decision that the board of the Friends would have to decide on. I don't feel like I necessarily have any sort of governing authority over that decision.
- Q. Right. Would that also be true, for example, in the -- so the general operating fund, which is funded by basically charitable donations, the use of those funds in the normal course of business would be up to the board; right?
- A. Correct, within the parameters of its
 mission and, you know, the scope of -- legal scope, of
 course, of --
 - Q. Right.
- 21 A. -- spending money that's charitable 22 donations.
- Q. But that in the normal course would not have been something that the court would have oversight of.
 - A. Not oversight, no, sir.

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

- A. It would be a board decision. I think, to answer that question, it would depend on the context around say the softball league or whatever other event they might be sponsoring.
 - Q. Right. Okay.

- A. If the event that they're sponsoring or the entity that they're sponsoring is going to lead to volunteers within the county, that -- yeah, that would be okay.
- Q. Or could lead to volunteers, because you never know whether you're going to get a volunteer until they say, "Yeah, I'm in." Right?
- A. That's right.
- Q. So there are recruiting events where people are -- maybe they have dinner or maybe there's conversation, and at the end of it some of them say, "Hey, I'd like to volunteer," and some people say, "Not for me." Right?
- A. Right.
 - Q. And you don't really know. I mean, you're

37

1 still -- you're still going to have the event in the 2 hope that there will be volunteers that come out of That's what they were doing, right, at 3 that event. Friends --4 5 I believe --Α. -- of Clayton County? 6 Q. 7 -- that was their intention. 8 can't say for sure. But I think I would say that 9 there's some qualifiers for determining whether or not an event is likely to lead to volunteers. I mean, I 10 certainly wouldn't come up here and attempt to recruit 11 12 volunteers for a program where somebody's going to have 13 to go to court in Clayton County routinely or see kids in Clayton County routinely. I'm going to focus my 14 volunteer efforts in directly around the county. 15 When you say "up here," you're talking about 16 Q. 17 Marietta? 18 Α. In Atlanta, yes. 19 Q. Atlanta? 20 Yeah. Well --Α. I thought maybe you were talking about 21 Q. 22 Marietta. 23 Α. Outside of -- you know, outside of Clayton 24 County where it's not a quick drive to the courthouse.

Right.

0.

25

But there was no rule that said that

38

1 volunteers from Atlanta could not be accepted into the 2 Friends of Clayton County --I don't believe there was --3 Α. -- CASA. 4 Q. 5 -- any residency requirement that said you Α. 6 had to like be a Clayton County citizen --7 Q. Right. 8 Α. -- to participate in the program. 9 Okay. All right. Let me ask you a few Q. questions about your preparation for the deposition 10 here today, and then I'm going to ask you a few 11 12 personal questions just so I can know who you are. 13 Α. Okay. We've barely started. All right? 14 Q. So what did you do to prepare for your deposition? And in 15 16 answering that question, you can tell me that you met 17 with the lawyers, but don't tell me what they said. 18 Α. Right. 19 Q. Okay? 20 I did meet with Michael and Bill --Α. 21 Q. Okay. -- on Wednesday. And yesterday primarily I 22 Α. 23 reviewed some documents that were part of the 24 investigation, if you will. 25 0. All right. How long did you meet with

39

Michael and Bill?

1

2

3

4

5

6

7

8

9

10

11

12

13

14

- A. I believe it was about four hours or so, maybe four and a half.
- Q. Okay. And then you said you reviewed some documents did you say yesterday?
 - A. Yesterday, yes, sir.
 - Q. Okay. What documents did you review?
- A. The MOU between the superior court and the county, the juvenile court, a memo that I had written to a DA's investigator. I think his name is Allen Crenshaw. I reviewed several other memos. I believe most of them were between Mr. Johnson and either to Mr. Bostock, or I think there was one -- a memo that I wrote to Mr. Johnson. I went through a lot of papers. It's hard for me to remember exactly what all of them were. But all of those were part of our investigative
- were. But all of those were part of our investigative file that was held from when all of that occurred in 2013.
- 19 Q. Did you review any emails or text messages?
- 20 A. Not text messages. I believe there was an email or two.
- Q. Okay. When this -- this litigation has been going on for a while, as you know; right?
- 24 A. Yes, sir.
- Q. When this litigation was started, was there

40

1 any internal directive to preserve any documents that 2 would have to do with Gerald Bostock or his claims? We did receive -- when I say we, the Α. 3 juvenile court -- Mr. Johnson was the director at the 4 5 time -- received a letter from the firm representing 6 the county instruct --7 0. Freeman, Mathis & Gary? 8 Α. Yes, sir, instructing us -- you know, 9 informing us of the litigation and instructing us to take action to preserve --10 11 Q. Do you have --12 Α. -- documents. 13 Q. Okay. I cut you off. I'm sorry. That's okay. 14 Α. Go ahead. Finish. 15 Q. No, just to preserve the documents related 16 Α. 17 to this case. Okay. Did you act accordingly? 18 Q. 19 Α. I didn't -- I preserved what I had --20 Q. Right. -- at the time I was the chief of staff. 21 Α. And Mr. Johnson certainly, he didn't throw out anything 22 23 from the investigative file that I'm aware of because

Do you have a county issued cell phone that

we have a pretty complete file.

24

25

0.

41

1 you use? 2 Α. I do. Okay. And has that been the case the entire 3 Q. time you were chief of staff? 4 5 Yes, sir. Α. What's that cell phone number? 6 Q. 7 Α. It's (678) 409-9293. 8 Q. Do you ever communicate by text message on 9 that phone about county business? Yeah, I have quite a bit in the past. 10 Α. I don't use that phone presently very often. 11 Okay. You still have it though? 12 Q. 13 Α. I still have it. Did you preserve any text messages that you 14 Q. had concerning Gerald Bostock on that phone? 15 16 I don't recall there ever being text Α. And if they had been, I have a practice of 17 periodically going through and deleting texts that are 18 no longer relevant, so I don't recall. In 2013, I 19 20 didn't have that particular phone anyway. I had -- I don't know. It may have been a Blackberry or an 21 Android phone. 22 23 Q. Okay. 24 Α. So --What happened to that Blackberry or Android? 25 0.

42

- A. The county rotates through updates -- or upgrades technology periodically, so it would have been turned in to the county Information Technology division. I don't -- I have no clue what they do with the old devices.
- Q. When you got the memo or letter from Freeman, Mathis & Gary, did you still have the old phone, your Blackberry or whatever it was?
- A. I'm not a hundred percent sure when I got
 the current phone that I had or the -- I had an iPhone,
 the previous generation.
- 12 Q. Okay.

1

2

3

4

5

6

7

8

9

10

11

13

14

15

16

- A. I want to say that would -- I would have gotten that sometime after we moved into our building, for some reason I remember that, which would have been September 12. I don't know.
- 17 Q. September 12 of what?
- 18 A. 2012. I'm sorry.
- 19 Q. Okay.
- 20 A. But that was the change from the Blackberry.
 21 I think there was an Android phone in between there,
 22 and then I had an iPhone. I think I've had two other
 23 iPhones since then. So they change or upgrade the
 24 phones about every two to three years.
 - Q. Do you recall this directive concerning

43

1 documents, the preservation of documents, do you recall 2 it instructing you to preserve all text messages? 3 Α. It may have. I don't recall that --Q. 4 Okay. 5 Α. -- per se. But it sounds like you, notwithstanding 6 Q. 7 that, may have deleted some? 8 Α. That would have been done contemporaneously 9 and prior to -- when I received -- when Mr. Johnson shared that letter with me, there were no text messages 10 on my phone at that time about anything to do 11 with Mr. Bostock. 12 13 Q. So there --That I recall. Α. 14 15 Was that at or about the time that the Q. 16 lawsuit was filed? 17 Α. I assume it would have been right after the lawsuit was filed --18 19 Q. Okay. 20 -- once the county received notice. Α. Okay. So Mr. Bostock was terminated on 21 Q. June 3rd, 2013. 22 23 Α. Correct. 24 Okay. Were you in the new building then? Q. Yes, sir. We had been there for about six, 25 Α.

44

eight months, something --

Q. Okay.

1

2

3

4

5

6

7

8

9

12

13

14

15

16

17

18

19

20

- -- like that. Α.
- And do you think at that point you had your Q. iPhone as opposed to your Android or Blackberry, or you're not sure?
- Α. I'm not sure. If I had to say, I would have probably have had the Android at that time.
 - Okay. But you turned that in? Q.
- Yes, sir. That was turned over to IT when 10 Α. they issued the first iPhone. 11
 - Q. When you communicated -- did you ever communicate by telephone with Mr. Johnson or Judge Teske, or anybody for that matter, about the events leading up to Gerald's termination? Did you ever talk on the phone with anybody?
 - I can't say that I didn't. I would say that Α. the vast majority of the communication about the issues during that time was in face-to-face meetings.
 - Q. Okay.
- But there may have been a phone call Α. answering a question or something. I don't recall. 22
- 23 Okay. And any -- if you still had -- if Q. 24 those communications were on your Android or 25 Blackberry -- by the way, those are two very distinct

45

1 kinds of phones. So you're not sure which one it was? 2 I mean --I mean, we're talking --3 Α. -- Blackberry has the little buttons, 4 Q. 5 elevated buttons --6 Α. Correct. 7 ο. -- and whatnot. 8 But, you know, what are we, nine years out? Α. 9 I can't remember --10 Q. Okay. 11 -- a granular detail eight, nine years ago. Α. 12 Q. Right. I remember my Blackberry. 13 Α. I just --I hated it, but that's why I remember it. 14 Q. I loved my Blackberry. I wish we'd have 15 Α. never gotten rid of it. But I do -- all I really --16 17 the reason I remember the Android so vividly is that there was this attempt by the county to use Android 18 19 phones, and it failed miserably, and they switched 20 within pretty short form to iPhones from the Blackberry. So there was the Blackberry, the Androids, 21 and then the iPhones came -- that's why I even remember 22 23 the Android. I didn't have it for but a few months 24 honestly. 25 So you may have turned -- in other words, at Q.

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

- When the suit was filed, I had an iPhone at Α. that point.
- Okay. What about when the EEOC charge was Q. You would have probably still had the Android or the Blackberry; right?
- Probably the Android. Or we may have -- I Α. don't remember how far out from the termination that occurred, but --
- 12 Q. Okay.

1

2

3

4

5

6

7

8

9

10

11

15

16

17

18

- 13 Α. -- depending on when it was, I may have had -- I don't recall exactly. 14
 - That letter from Freeman, Mathis & Gary, did it -- did you receive it, or did it come to your inbox at or about the time that the EEOC charge was filed, or was it at or about the time that the lawsuit was filed?
- Α. I'm going to assume it was about the time 20 the lawsuit was filed.
- 21 Q. Okay.
- I don't -- I had nothing -- I don't recall 22 Α. 23 having anything to do at all with the EEOC filing and 24 hearing that occurred, and I'm not sure about the time line of how those things played out. 25

47

1 Q. Okay. All right. So let me go back and 2 just get a little bit of personal background on you. Okay. First of all, Mr. Slay, what is your home 3 address? 4 5 Α. It's 405 Fayetteville Road, and that's in 6 Jonesboro, Georgia 30236. 7 Q. So you actually live outside of Clayton 8 County; right? 9 Α. No, sir, I'm in -- I'm in downtown Jonesboro. 10 11 Q. Okay. All right. So you are in Clayton 12 County. Yes, sir. 13 Α. All right. How long have you lived there? 14 Q. 15 Α. 9 -- coming up on 19 years. 16 Married or single? Q. 17 Α. Married. What's your wife's name? 18 Q. 19 Α. Catherine Slay. 20 Katherine with a K? Q. 21 C. Α. Do you have children? 22 Q. 23 I do have one daughter. Α. 24 Q. Is she over 18? 25 No, sir. She's 17. Α.

48

1 Q. 17. She may come of age before we try this 2 case. What is her name? Caitlin, C-a-i-t-l-i-n, Slay. 3 Α. And that's your only child? 4 Q. 5 Yes, sir. Α. 6 Okay. Do you have relatives who live in the Q. 7 metropolitan Atlanta area? I do. 8 Α. 9 Q. Okay. My mother and father and my father-in-law. 10 Α. I have several aunts and uncles and --11 12 Q. Okay. 13 Α. -- some cousins as well that --Let's walk through them pretty quickly. 14 Q. 15 Tell me your mom and dad's name and where they 16 live. 17 Α. It's Charles and Kristin, with a K, Slay. And they live in Forest Park. 18 And you said your father-in-law lives in --19 Q. 20 He's in Peachtree City. Α. Okay. Peachtree City. What's his name? 21 Q. Raymond Fust, F-u-s-t. 22 Α. 23 Do you have any siblings who live in Q. 24 metropolitan Atlanta? My brother, only brother, lives in 25 I don't. Α.

49

1 Colorado. 2 Q. Okay. How about does -- does Raymond have any children that live in metropolitan Atlanta? 3 Α. He does. He has two, my wife and my 4 5 brother-in-law, who lives outside of downtown -- or the 6 City of Jonesboro, but it's a Jonesboro address. 7 Q. So your -- and your brother-in-law is who? 8 Α. William Fust, F-u-s-t. 9 Okay. And you said you had perhaps some Q. aunts and uncles that live in metropolitan Atlanta? 10 I've got one on my mom's side --11 Α. Yes, sir. 12 well, one aunt on my mom's side and my uncle on her 13 side. And then there are one, two -- three aunts and uncles on my father's side that live in the metro area. 14 15 Let's run down that list, if we can. Q. 16 Α. Okay. Give me the names of those folks. 17 Q. So my aunt on my mom's side is Linda Ellis. 18 Α. She lives in Atlanta. 19 20 Q. Okay. My uncle is Kenneth Crook. He lives in 21 Α. Well, no, Sharpsburg. 22 Newnan. 23 Q. Okay. 24 I have an Aunt Gail, Shelton is her last Α.

name, and she lives in Stockbridge.

50

1 Q. Okay. 2 Α. An uncle, Douglas Slay. He also lives in Stockbridge. 3 4 Q. Okay. 5 And then another uncle, Randy Slay, and he Α. 6 lives in Jefferson. That's probably outside of metro 7 Atlanta, but --8 Q. Anybody else you can think of? Okay. 9 I believe everybody else is in North Α. Carolina and Alabama. 10 11 Q. Okay. So --12 Α. Florida. 13 Q. -- if you in the course of testifying remember there's a stray relative in metropolitan --14 15 Α. Okay. -- Atlanta, let me know, would you? 16 Q. 17 Α. Well, my brother -- my dad had seven 18 siblings, so --19 Q. Okay. 20 But they're scattered all over. Α. They're not in metro Atlanta? 21 Q. I don't -- no. Two of them live in Florida, 22 Α. 23 one's in Alabama, and one's in North Carolina, I 24 believe. Let's get a little bit about you 25 0. All right.

51

1 personally. How old you are, sir? 2 Α. 45. Where are you from originally? 3 Q. Clayton County, born in Forest Park -- well, 4 Α. 5 born in Riverdale technically at the hospital but grew 6 up in Forest Park. 7 Q. Where did you go to high school? 8 Α. Forest Park High School. 9 Graduate there? Q. Yes, sir. 10 Α. Any college education? 11 Q. 12 Α. Yes, sir. 13 Q. Okay. Tell me about that. 14 Georgia State University. Α. 15 Did you get a degree? Q. 16 I did, bachelor degree in criminal justice. Α. 17 Q. What year did you get that degree? Would have been 1998. 18 Α. 19 All right. And have you got any Q. 20 postgraduate work? I was part of a fellowship program with the 21 Α. Annie E. Casey Foundation. The name of the program was 22 23 the Applied Leadership Network. 24 Q. Applied Leadership, was that -- I've heard 25 of Annie E. Casey. Is that related to the Carnegie

52

1 Institute, or am I --2 Α. It's actually named after the founder of UPS's sister. 3 4 Q. Okay. 5 Α. That was her name. 6 All right. And it's called the Applied Q. 7 Leadership Institute? 8 Α. Network. 9 Network. Is that out of Atlanta or where? Q. Baltimore. 10 Α. Okay. Did they have a program in metro 11 Q. 12 Atlanta, or did you go up to Baltimore for it? 13 Α. Went to Baltimore mostly. They also -- I mean, we also did seminars in New York City, Seattle, 14 and I believe Memphis --15 Was this --16 Q. -- if I remember. 17 Α. -- any of this online? 18 Q. 19 Α. No, sir, it was all in person. This was 20 done in 2010 and '11, so it was kind of before the 21 online --22 Q. Did you get a --23 Α. -- stuff. 24 Q. -- degree or certification as a result of this? 25

- A. I would call it a certification. I mean, I finished the program, got a cert -- you know, a certificate from it.
 - Q. And what were you certified as or to do?
- A. Well, as the name implies, it was a leadership building program, a leadership skill building program. And it was specifically oriented around juvenile justice reform work. It's part of an initiative of the foundation called the Juvenile Detention Alternatives Initiative. You often hear that referred to as JDAI.
- Q. The acronym basically suggesting that the program tries to encourage or foster alternatives to juvenile detention?
- A. Correct.

- Q. That will remediate behavioral problems in juveniles?
- A. That, and it's all based around research
 that shows sort of the dangers of detaining the wrong
 kids or overusing detention and the negative impacts
 that can have on those youth and their prospects in the
 future. And that's what JDAI is. And the Applied
 Leadership Network is around building up leaders to
 further the JDAI work, if that makes sense.
 - Q. Who paid for you to attend this program?

54

- A. The Casey Foundation.
- Q. Okay. So was it sort of a scholarship or what? Did you apply for it?
- A. I did apply. There's no cost to

 participate. They cover all of the travel, and so
 basically my contribution was my time.
 - Q. Okay. So the Clayton County Juvenile Court was not involved in any way in your being in this program?
 - A. Other than allowing me the liberty to go to the seminars --
- 12 Q. Okay.

1

7

8

9

10

11

- 13 A. -- to participate.
- Q. So you graduated. You got your bachelor's in 1998. When did you go to work for Clayton County?
- A. January 4th, 1999. And I actually interned
 with the court as part of the -- of my senior year in
 the bachelor's program.
- Q. And when you did, when you went to work for Clayton County, you went to work for the juvenile court?
 - A. Yes, sir, as a probation officer.
- Q. Okay. And so let's -- you were basically a freshly minted college graduate then. You -- so you started as a probation officer in the juvenile court.

55

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

A. Okay.

- 4 Q. -- up to the present. Okay?
- 5 A. Yes, sir.
- Q. So what was -- how long did you hold the position of a juvenile court probation officer?
- A. I believe it was about three years, and then
 I was promoted to the supervisor of one of the
 probation units.
- 11 Q. So that would be in or about 2002?
- A. Yes, sir, 2002 or 2003, somewhere in that time frame.
- 14 Q. You were promoted to be supervisor --
- A. I think the title was actually called probation supervisor at the time.
- Q. Probation supervisor. That was a bump up in pay, I assume?
- 19 A. A little bit.
- 20 Q. Okay. Not nearly enough though.
- 21 A. No, sir.
- Q. Right. All right. So then you're probation supervisor. For what period of time were you probation supervisor?
- 25 A. I believe I was in that position until 2007.

56

1 And at that time I was promoted into a position called 2 the JDAI coordinator. 3 Q. JD --Α. -- AI coordinator. 4 5 -- AI. Q. It's an acronym for the Juvenile Detention 6 Α. 7 Alternatives Initiative. 8 Q. Is that about when you were taking this 9 certification or just received your certification? That was actually before I did that. I did 10 Α. that a couple of years after that. So I went 11 12 through -- I know I went through the fellowship program 13 in 2010 and '11. So you're JDAI coordinator starting 14 Q. Okay. in 2007, and for what period of time did you hold that 15 position? 16 Α. For about 18 months. Sometime in 2009 I was 17 promoted to chief of staff. 18 19 Is that the position you hold today? Q. 20 No, sir. I am now the director of juvenile Α. court operations. 21 Okay. When did you get that promotion? 22 Q. 23 That would have happened in 2018. Α.

between your position of chief of staff and your

Okay. So was there any other position

24

25

Q.

57

1 position of director of juvenile court operations? 2 Α. Not really a different position. That chief 3 of staff position was reclassified, was given a different title. 4 5 What was that? Q. Director of programs and resource 6 Α. 7 development. 8 Q. And when did that reclassification happen? 9 I believe it was I'm going to say around Α. 2015. I don't recall exactly, but somewhere in that 10 11 area. 12 Q. Okay. Was there any change in job duties or 13 an expansion of job duties, or it was just a change in job title? 14 Α. There was a restructure in the court at that 15 time, and my responsibilities moved more on the program 16 17 side of the court. So -- and resource development was essentially looking for grant funding and other, you 18 19 know, opportunities to partner with community partners 20 or other organizations and to develop those --21 Q. Okay. 22 Α. -- collaborations. 23 I want to go -- so at the time that Q. 24 Mr. Bostock was terminated, you were chief of staff?

I was chief of staff at that time.

25

Α.

58

Let's focus on that for a bit. 1 Q. Okay. So --2 and that's from 2009 to 2018; right? Right, with the --3 Α. Well, with the --4 Q. 5 -- with the reclassification, yes, sir. Α. -- the reclassification. But it sounds to 6 Q. 7 me like, at least at the time that Gerald was 8 terminated, you were still --9 Α. It was chief of staff. -- called chief of staff. 10 Q. Yes, sir. 11 Α. 12 Q. Right. Okay. So let's focus on that for a 13 minute as chief of staff. I want to get clear on your reporting relationships during that period of time. 14 First of all, who did you report to when you were chief 15 16 of staff? John Johnson. He was the director of court 17 Α. operations at that time. 18 Director of juvenile court operations? 19 Q. 20 Yes, sir. Court administrator is probably Α. more how that would be commonly understood. 21 Well, have you taken Mr. Johnson's place in 22 Q. 23 your promotion now? 24 Α. Yes, sir. When he -- he retired --

25

0.

Okay.

_	, race Deposition						
1	A the summer of 2018, and I took over that						
2	position.						
3	Q. Are you ever called now, in your role as						
4	director of juvenile court operations, are you ever						
5	called court administrator?						
6	A. (Witness nods head affirmatively.)						
7	Q. It's the same.						
8	A. Yeah.						
9	Q. Right?						
10	A. Right.						
11	Q. Okay. Depends on who's calling you and						
12	A. Yeah. And, you know, in some jurisdictions						
13	that's what they are officially titled, but						
14	Q. Okay. All right. So as chief of staff, you						
15	reported to Johnson. And was that consistent						
16	throughout the time that you were chief of staff?						
17	A. It was.						
18	Q. Okay. And who reported to you? I'm						
19	interested, first of all, in positions						
20	A. Right.						
21	Q that reported to you, and then we'll get						
22	into names.						
23	A. Okay.						
24	Q. All right? So tell me the positions that						
25	reported to you.						

60

- A. So the chief of Child Welfare.
- Q. Okay.

1

- A. The chief of Field Operations, the Clerk of Court, the Restorative Justice Division.
 - Q. Restorative Justice Division?
- A. Yes, sir. The JDAI coordinator, the chief
 of Special Juvenile Justice Programs. Kind of going
 through my head and making sure I'm not leaving out
 anyone.
- 10 Q. Yep.
- 11 A. Oh, the grants coordinator and the court's 12 IT coordinator.
- Q. And I want to be clear. All of these
 different positions reported to you while you were
 chief of staff; right?
- 16 A. Yes, sir.
- Q. Okay. Which one of these positions was held by Gerald Bostock? Did he report directly to you?
- 19 A. He did.
- 20 Q. Okay.
- 21 A. The chief of Child Welfare.
- Q. Okay. And then John Johnson, who did he report to? Did he report to Judge Teske?
- A. He did.
- Q. Mr. Teske was called chief judge --

61

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

- Q. And Judge Teske was, with respect to Gerald's termination, he was the decision maker on that; correct?
- A. Judge Teske was the final decision maker, yes, sir.
 - Q. Okay. Did you make any recommendation to Judge Teske one way or the other with respect to Gerald, I mean, being terminated?
- 11 A. I didn't make a direct recommendation. The recommendation was made by Mr. Johnson.
 - Q. Okay.

3

4

5

8

9

10

13

16

17

18

19

20

- A. But I was involved in the conversations with

 Mr. Johnson and, of course, with Judge Teske as well.
 - Q. I just want to be clear because what I asked is did you recommend that Gerald be terminated. Did you recommend -- and I'm asking you a direct question about a direct thing. Did you recommend to Judge Teske that Gerald be terminated, yes or no?
- 21 A. I concurred with the recommendation that was 22 on the table is the way I would characterize it.
 - Q. Okay.
- A. I don't recall saying Mr. Bostock should be terminated.

62

1 Q. Okay. 2 Α. There was conversation. We talked about it. I concurred with the consensus. 3 Did you recommend to Mr. Johnson that 4 Q. 5 Mr. Bostock be terminated? 6 Not directly. Α. 7 0. Okay. You provided Johnson with information that led to Mr. Bostock's termination? 8 9 I didn't, no. Α. You did not? 10 Q. I didn't provide any --11 Α. 12 Q. Okay. -- information to him. That decision was 13 Α. based on the results of the audit primarily. 14 15 Okay. And we'll look at that audit document Q. 16 Is that what -- is that document what was 17 relied on in terminating Gerald? Primarily, yes, sir. 18 Α. 19 Q. Okay. And when I say "was relied on," based 20 on your knowledge of what was relied on --Yeah. 21 Α. -- that audit document was --22 Q. 23 Yeah, it was the genesis of what led to the Α. 24 termination, yes, sir. 25 0. All right. Okay. So -- and when you say

63

1 you concurred, of course, both Teske and Johnson were 2 your boss; right? Yes, sir. 3 Α. Okay. So there's a certain amount of self 4 Q. 5 interest in concurring with decisions that your bosses 6 make. Fair? 7 Generally speaking, yes. I would add, 8 though, that I never felt like I couldn't give my own 9 opinion or that it wouldn't be listened to or that I would in any way like be chastised or punished for --10 11 Q. Right. -- dissent or something like that. 12 Α. I had a 13 very good relationship with both of them. What I want to be clear on is you weren't 14 Q. spearheading the drive to terminate --15 16 No, sir. Α. 17 Q. -- Gerald? Okay.

- 18 Α. Not in that way, no, sir.
- 19 Were you involved in furnishing information Q. 20 for the audit?
- I was involved in a conversation with Stacey 21 Α. Merritt and John Johnson, and I believe Leslie Moore 22 23 was in that -- part of that conver -- I don't remember 24 if she, honestly, was there. I do recall Stacey 25 Merritt and sharing information. I didn't produce any

64

1 documentation that I recall. 2 Q. Right. Now, the issue in the audit, there was an audit of Friends of Clayton County CASA funds. 3 Am I correct about that? 4 5 Correct. It focused on that GAL account Α. 6 specifically. 7 Q. Did Gerald, in his position as chief of Child Welfare, have any oversight over any 8 9 government funds? He -- there were at least two grants, one of 10 Α. which was from a government entity. At that time I 11 believe it was called the Criminal Justice 12 13 Coordinate -- no, that's what it is now. It may have been called Children Youth Coordinating Counsel, I 14 15 believe. The name of the entity's changed several 16 times --17 Q. Okay. -- in the years. And then there was another 18 grant from Georgia CASA, which is a nonprofit --19 20 This was --Q. -- that partially funded Mr. Bostock's 21 Α. 22 salary. 23 Okay. So these were grants to the Q. 24 government, to the Clayton County --

To the juvenile court, yes, sir.

25

Α.

65

1 Q. Juvenile court. Okay. And there was no 2 finding of any improper handling of any of that grant 3 money by Mr. Bostock? No. And just to clarify, he was in charge 4 Α. 5 of the programming aspect of the grants. And there --6 I'm sure there were financial aspects to it, but it's 7 not like, you know, that he had received a check from 8 the government entity and had funds to spend. 9 were funds that were reimbursed to the county --10 Q. Right. -- off of that grant. 11 Α. 12 Q. Yeah. 13 Α. But that was all handled through the county finance department. 14 Q. Okay. Now, I've looked at -- you did 15 Gerald's performance reviews for a period of time; 16 17 right? I did a few of them, yes, sir. 18 Α. 19 Q. Okay. I looked at them. They were all very 20 favorable. 21 Α. Yes. Best of your recollection; right? 22 Q. 23 Yes, sir. Α. 24 And we'll look at them today; but, I mean, Q.

generally -- I mean, with maybe one or two exceptions,

66

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

A. That's right.

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

- Q. Okay. Did you get along with Gerald?
- A. I always felt like I had a good professional relationship with Mr. Bostock.
 - Q. Okay. All right.
 - A. There were times, you know, where we were dealing with management issues primarily around employees where we didn't always agree on things, but it was always professional.
 - Q. It was a -- well, where two or three professionals are gathered together, there is always disagreement, although not necessarily discord; right?
 - A. Correct, yes.
 - Q. Okay. In your handling of any disagreements that you all had, he conducted himself professionally, and you conducted yourself professionally; right?
 - A. I always felt that way, yes, sir.
- Q. Okay. And it looks to me from your performance reviews as if those, whatever those disagreements were, they didn't strongly impact his performance reviews.
- A. No, they -- if you want to call them
 negative marks or remarks, it was really more like

67

1 corrective sort of criticism or, you know, suggestions. 2 And it was all focused primarily around his relationship with his subordinates. 3 Q. 4 Right. 5 Α. There had been some tension within the unit. 6 Q. Okay. 7 Α. Some accusations of things like favoritism, 8 micromanagement, those sorts of things. 9 Right. Q. So --10 Α. 11 Q. Okay. 12 Α. -- my interaction in that regard with 13 Mr. Bostock was more, "Hey, here are some things that you can try, please do this differently, " that kind of 14 stuff. It wasn't --15 He had quite a number of people that he was 16 Q. 17 supervising, including a whole bunch of volunteers; right? 18 19 I believe the number probably would 20 have been eight to ten people, depending on the time frame. 21 22 Q. Okay. 23 And then the volunteers reported to those Α. individuals. 24

25

Q.

Right.

These criticisms, the discussions

68

you had surrounding his interactions with his personnel 1 2 were more in terms of what you would probably describe as constructive criticism. Fair? 3 Yeah, I would -- that's fair. 4 Α. 5 I'm sure anybody who's a leader, there's Q. 6 always somebody who's going to say that they're not as 7 good as they should be; right? 8 Α. Absolutely. 9 And that's happened to you, I'm sure. Q. Sure, sure. 10 Α. Right? Okay. Have you ever received 11 Q. constructive criticism with respect to your 12 13 interactions with your subordinates? Α. I'm sure, you know, a suggestion has been 14 15 made to me. Right. 16 Q. 17 Α. I've never -- never really had the sort of problem with my subordinates that Mr. Bostock ran into, 18 19 not -- especially not in any --20 Q. Okay. -- kind of large scale where it was 21 Α. involving multiple people. I mean, there have been a 22 few difficult employees through the times --23 24 Q. Yeah.

-- but --

25

Α.

69

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

- A. Sometimes, yeah.
- Q. Yeah. So -- and we'll talk about Mr. Black.
- 6 A. Okay.

1

2

3

4

5

7

8

9

16

17

20

21

22

23

24

- Q. Mr. Black is the guy who wrote a memo after he -- wasn't it after he was terminated that criticized Gerald?
- A. It was an email. And just to clarify,

 Mr. Black lost his job. It was more of a layoff

 situation. His position was grant funded, and that

 funding ended, and the county did not pick up the

 position. So when the funding stream ended, he lost

 his job.
 - Q. Okay. Do you know if he was, with respect to Gerald, a problem employee?
- 18 A. I know there was quite a bit of tension
 19 between him and Mr. Bostock.
 - Q. Do you know much about that?
 - A. I know in general terms it was -- I think Shawn had accused Mr. Bostock of showing favoritism toward other employees, of sort of minding Shawn's personal life, kind of getting into some of that. I recall that.

70

Q.	Did	you	ever	dig	down	far	enough	to know	
whether	there	was a	any m	erit	to t	hose	critici	isms?	

- A. I didn't personally. I know Mr. Johnson was involved in a meeting -- I actually was present in the meeting as well, but there was a meeting with all of the employees of the unit and Mr. Bostock, and Mr. Johnson basically went around the room and let each person sort of say their piece.
 - Q. And Mr. Black said his piece?
 - A. Yeah, I believe he was there, yes, sir.
- 11 Q. This meeting and these criticisms never 12 resulted in Gerald being written up or disciplined?
- 13 A. No.

1

2

3

4

5

6

7

8

9

10

19

20

21

22

23

24

- 14 Q. Okay.
- A. There was a -- I wouldn't call it discipline. There was, if you want to call it anything, probably a coaching.
- 18 Q. Okay.
 - A. A memo that was produced sort of documenting that meeting and providing Mr. Bostock with some instructions and -- around different ways to handle things in the future.
 - Q. But you all had a progressive discipline policy that if you had felt that this was something that rose to the level of discipline you could have

71

1 used; correct? 2 Α. Yes. And that includes everything from verbal 3 Q. warning to written warning to suspension and, of 4 5 course, termination. 6 Right. Those are the general steps in it. Α. 7 ο. I've got a note that says that our 8 videographer is about to run out of disc, so we're 9 going to take a little break here. 10 Α. Okay. If you need to stretch, use the facilities, 11 Q. 12 whatever, take your time. Be sure you take your 13 microphone off when you do. 14 Α. All right. Thank you. 15 MR. BUCKLEY: Okay. Thank you. We're off 16 the record. 17 (VIDEO CAMERA OFF.) (A brief recess was taken.) 18 19 (VIDEO CAMERA ON.) 20 THE VIDEOGRAPHER: We're back on the record. (An off-the-record discussion was held.) 21 (Exhibit Number P-3 was presented.) 22 BY MR. BUCKLEY: 23 24 Q. So I want to show you what's marked as Plaintiff's Exhibit 3 and ask you if you can identify 25

It's Bates stamped Clayton 232 through Is this the memorandum of understanding between

72

the Superior Court of the State of Georgia for the

County of Clayton and Clayton County CASA that you and 4

I were discussing during the first couple of hours of

6 this deposition?

this document.

1

2

3

5

7

8

9

10

11

12

13

16

17

18

19

20

21

22

23

24

25

Α. It is.

Q. Okay. And I'd like to ask you to look at page 2 of this document. Section II there says Administrative Fee, and it says, "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 14

until the administrative fee is received." 15

And then it says, "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," quote, "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

73

1 Juvenile Court, 121 South McDonough Street, Courthouse 2 Annex 3, Jonesboro, Georgia, 30236." I have read that correctly, haven't I? 3 Yes, sir. 4 Α. 5 And then the next sentence after that says, Q. 6 "The Clayton County CASA Advisory Board is the 7 recipient of the administrative fee and will use the 8 fees to fund volunteer recruitment, training, and 9 retention." Right? 10 Α. Correct. Okay. So that -- and that's really all it 11 Q. 12 says about -- in this document about the use of those 13 fees; right? I believe so, yes, sir. 14 Α. 15 Q. Okay. 16 Α. Yes. 17 Q. Okay. And this document was signed by a number of individuals. It was signed on November 20th, 18 19 2007, by Matthew Simmons, who was the chief judge of 20 the superior court, Clayton Judicial Circuit, at that time; right? 21 22 Α. Correct. 23 That's his signature there. And then also Q. 24 by K. Van Banke, chief judge of the juvenile court at the time; right? 25

video Deposition

74

- A. Correct, Judge Banke.
- Q. Banke. Sorry. And then Gerald Bostock, who was CASA program coordinator for the Juvenile Court of Clayton County; right?
- 5 A. Correct.

1

2

3

4

6

7

9

10

11

12

13

14

15

16

17

22

23

24

- Q. Okay. Do you know who drafted this document?
- 8 A. I don't know.
 - Q. Okay. Would you agree with me that the one-sentence directive on the use of the fees is pretty broad in terms of -- I mean, it says it'll be used for volunteer recruitment, training, and retention. But it doesn't itemize the specific areas, you know, what's appropriate or what's not appropriate in terms of, for example, purchases of alcohol or sponsoring of teams or things like that. It's not that specific; right?
 - A. No, sir.
- Q. Okay. Do you know whether Mr. Bostock's recruiting events in Atlanta ever resulted in volunteers for the Clayton County CASA Guardian Ad Litem program?
 - A. The only volunteers that I know of were I believe two or three that he mentioned when he responded to the questionnaire that was given to him.
 - Q. Okay.

A. Those are the only ones I know of.

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

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

12 Q. Okay.

A. -- came from that softball league.

Q. Okay.

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

Q. And I don't either.

A. -- what their capacity of volunteer --

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

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

guardian ad litems.

- Q. Okay.
- A. That was the primary focus of, you know, the volunteer recruitment, training, and retention.
- 5 Q. Okay.
 - A. But there were other individuals that, you know, were recruited to help with the Friends' fundraising events and whatnot. I wouldn't call those -- they weren't volunteers, obviously, for the GAL. That was more volunteer to assist with the fundraising efforts of -- or marketing or something like that for the Friends of Clayton County CASA.
 - Q. All right. So -- and I don't know whether you were deep into the whole recruitment effort or the training effort, but let's talk about recruitment. Did you ever -- were you ever aware of recruiting events, whether they were in Clayton County or elsewhere, that were perhaps not successful in recruiting a volunteer?
 - A. I didn't do a lot of participation in the recruitment events.
 - Q. Right.
 - A. I mean, I'm sure there were probably some
 events where -- that weren't fruitful in terms of
 getting --
 - Q. Right.

77

1 -- volunteers, but I don't know of --Α. 2 Q. Right. -- personally anything. 3 Α. Sometimes you can get people to dig into 4 Q. 5 their pockets, and sometimes you can't; right? Right. 6 Α. 7 0. Okay. So -- and you're not critical -- in 8 terms of Gerald's efforts to recruit, you're not 9 necessarily critical of those efforts because of the results. You're just critical of the way he was 10 11 recruiting; right? I'm not sure I'm critical of the recruiting 12 Α. at all. 13 It was the methodology. Well, that's what I mean, the way. 14 Q. The methodology that was used --15 Α. Okay. 16 Q. Okay. 17 Α. -- or the approaches that were used. But in terms of methodology, nothing in this 18 Q. 19 MOU dictates the methodology he should use. 20 Α. No. Right. Okay. So I want to talk a little 21 Q. bit more about Mr. Black. You and Gerald, separate and 22 23 apart from the meeting that you referenced, you and 24 Gerald talked some about Mr. Black and his performance-related problems, didn't you? You had

78

several conversations about that.

- A. Right, about the overarching issues. There may have been some conversations, you know, more specific about individuals.
- Q. And some of the -- some of Mr. Bostock's concerns, as he expressed them to you, were that Mr. Black was sometimes dishonest with him; correct?
- A. I do recall that --
- 9 Q. Okay.

1

2

3

4

5

6

7

8

- 10 A. -- being a comment.
- Q. Sometimes, in terms of the documentation
 that he submitted, Gerald was concerned that Mr. Black
 was being dishonest. And he told you that, didn't he?
- 14 A. I believe so.
- Q. Okay. And he told you that he had written

 Mr. Black up; right?
- A. I recall there was an incident where he
 disciplined an employee. I don't remember if it were
 Mr. Black or someone else --
- 20 Q. Okay.
- A. -- that caused some concern for Mr. Johnson.

 Basically, Mr. Bostock didn't follow the policy that

 was in place that you get to a certain level of

 discipline, you're supposed to consult the court

25 administrator prior to presenting it to the employee.

79

1 I recall that. 2 Q. What level? What level of --Α. 3 Of discipline. 4 Q. 5 If you're getting to the point where you're Α. 6 doing what would be considered a formal write-up, what 7 the county refers to as a general counseling form. 8 Q. Okay. Did he ever -- would he have to talk 9 to the court administrator, or would he just have to talk to you as his supervisor to get authority to write 10 Mr. Black up? 11 I believe at that time the court 12 Α. 13 administrator, Mr. Johnson, would have to sign off on that form prior to it being presented to the employee. 14 So his chain of command, it would have come through 15 16 me --17 Q. Right. -- to, you know, in other words, make me 18 19 aware of it, and then Mr. Johnson would sign it. 20 Do you recall whether he ever asked you for 0. authority to write Mr. Black up? 21 I don't recall. 22 Α. 23 Okay. And when you say you don't recall, Q. 24 you're saying you just don't remember; right?

I don't remember, right.

25

Α.

80

1 You're not going to say he did; you're not Q. 2 going to say he didn't because --I don't remember. 3 Α. -- you don't remember. 4 Q. 5 Right. Α. That was a little while ago; right? 6 Q. Okay. 7 Α. Yes. 8 There may be a few other things you don't Q. 9 necessarily remember because this has been -- this is 2012, 2013 we're talking about; right? 10 Α. Correct. 11 12 Q. Okay. Did Mr. -- did you ever talk to 13 Mr. Black after he was terminated? I didn't, other than that email that was 14 Α. 15 sent. 16 Q. Okay. 17 Α. I don't recall ever talking to Mr. Black. Okay. Well, when you say "other than the 18 Q. 19 email," when you're saying -- when I'm saying talk, I 20 mean talk. Interact personally, no. 21 Α. 22 Q. All right. 23 I don't recall doing that. Α. 24 Q. Let me show you that email, the one I think This is Plaintiff's Exhibit 19. 25 we're talking about.

81

1 (Exhibit Number P-19 was presented.) 2 BY MR. BUCKLEY: Q. Is this the email that you were referring 3 4 to? 5 It is. Α. Okay. So this is an email dated 6 7 January 17th, 2013, and it's addressed to Janice Wilson Who is Janice Wilson? 8 and you. 9 That was Mr. Johnson's office administrator, Α. assistant. 10 Okay. She didn't really have supervisory 11 Q. authority over him; right? 12 13 Α. No. But it's also addressed to you, and you 14 Q. received this; right? 15 Actually, it's addressed to Mr. Johnson. 16 Α. Excuse me. It is addressed to Mr. Johnson. 17 Q. You're right. And then Mr. Johnson forwarded it to you 18 19 and Ms. Wilson; right? 20 He either forwarded it or, you know, printed Α. out a copy and gave it to me. I don't remember. 21 Okay. Well, I'm looking. "Forwarded by 22 Q. 23 John Johnson," do you see that? 24 Α. Right. But it doesn't say it was forwarded to me, I don't believe. 25

82

1 Well, it does, because then it shows --Q. 2 let's see -- "forwarded by John Johnson" --3 Oh, okay. Yeah, I see now where you're Α. talking about. 4 5 Okay. Q. 6 Α. Yes. 7 0. Right. Okay. So Black wrote Johnson. 8 Johnson forwarded it to you and Janice Wilson. And did 9 you reply to this in any way? Not that I recall. 10 Α. Okay. And you knew that -- or did you know 11 Q. at this point in time that Johnson's -- I'm sorry --12 13 that Black's position had been defunded? 14 Α. This was maybe a month or so after --Yes. 15 Q. Okay. -- the grant ended. 16 Α. 17 Q. Did you have conversations with Gerald Bostock about Black in which Bostock was talking to you 18 about the need to discipline Black or terminate him? 19 20 I believe there was a conversation to that Α. effect, yeah. 21 And then the position was defunded, and so 22 Q. 23 no need to formally fire him because his job just went 24 away --25 Right. Α.

- Q. -- due to lack of funding; right? So, in a way, that was the solution to a problem that had been ongoing; correct?
- A. I mean, you could look at it that way. But what I would have to say is Mr. Bostock had negative interactions with several of his employees, which, you know, that was noted in the performance evaluations we referenced earlier. There were several employees that Mr. Bostock wanted to get rid of, and my position was to step back a minute. You know, in my position, I look at common denominators, and the common denominator there was Mr. Bostock. So then I have to take a very careful look at what's going on before we take action.
- Q. Well, we're going to look at his performance reviews in a minute. It's fair to say, in any event, he had several conversations with you specifically about Black?
- A. I don't know about several. I mean, we had some conversation, I'm sure.
 - Q. Okay. Well, several is more than one?
 - A. Yeah, maybe.
 - Q. You had more than one; right?
- 23 A. Right.

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

84

and specifically his honesty or lack thereof; correct?

- A. I honestly don't recall the content of -nor the granular detail of the conversation.
 - Q. Okay. And do you know if, regardless of whether it was written discipline, Mr. Bostock was talking to Mr. Black about his concerns about Black's not showing up for certain events that he was required to show up to or his dishonesty on some of the forms that he submitted to the court, or other performance issues?
- 11 A. I have no clue what Mr. Bostock talked to 12 Mr. Black about.
 - Q. So you don't know whether part of
 Mr. Black's motivation for sending this memo was his
 ire at Mr. Bostock for having perhaps singled him out
 due to his performance?
- 17 A. That would require me to speculate and --
- 18 Q. Okay.

1

2

3

4

5

6

7

8

9

10

13

14

15

- A. -- I don't know. I mean, I'm not going to get into somebody's internal motivation for something.
- Q. Do you happen to know or recall whether
 Mr. Black blamed Mr. Bostock for his termination?
- A. I don't know if he blamed him or not. I don't know.
- Q. Okay. So, if I understand, this email

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

staff.

85

resulted in an investigation and the audit occurring? Or were they related or they were not related or is the audit completely just unrelated to this email? Α. The audit happened independent of this or --Q. Okay. And, I mean, it was relevant to the audit. Α. I felt like, once we received this information, the court administration had some responsibility to look into it, of course. But I just want to be clear because I'm Q. looking at causation. Α. Right. Q. This email didn't cause Gerald to be terminated? Α. No, not this email. I want to show you an exhibit or two, Q. and I want to be clear. During what time frame -- you know, you gave me a time line for the different jobs that you held. And you were in your position as chief of staff or director of programs and resource development from 2009 to 2015, those two jobs; right? Right. During all of this, it was chief of Α.

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

86

1 performance reviews that I believe you did. Were those 2 the only periods that you had oversight over Gerald, 3 direct reporting relationship? Α. 4 Yes. Let's take a look at those for a few 5 Q. Okay. 6 minutes. Okay? 7 Α. All right. 8 I want to show you first what's marked as Q. 9 Exhibit 32. (Exhibit Number P-32 was presented.) 10 BY MR. BUCKLEY: 11 Exhibit 32 is a document Bates stamped 12 Q. 13 Clayton 1790 through 1795, and it appears to be a performance review of Gerald Bostock for the appraisal 14 period of 1/13/09 to 1/12/10. And it says supervisor, 15 Colin Slay. This is a performance review that you 16 17 prepared, Mr. Slay? It is. 18 Α. 19 Okay. And I just want to be clear because I Q. 20 want to focus on the things that matter here. several pages of this document. I think if you go back 21 to the page that's Bates stamped 1793, go back to that 22 23 one. It's further back, sir. 24 Α. Oh, 17 -- oh, I see the numbers now. 25 All right. So 1793 through 1795 is 0.

87

1 basically Gerald's self-evaluation; is that right? 2 Α. That's right. And so the pages before that, those are your 3 Q. evaluation of his performance; correct? 4 5 Α. That is correct. Okay. So let's just look generally at the 6 Q. 7 areas that you rated him on. And it looks like, with 8 the exception of supervisory/management ability, you 9 rated him a solid 5, which was the highest score for every category; is that right? 10 11 Α. Correct. 12 Q. So he had a total score of I guess 49 out of 13 a possible 50? That's right. 14 Α. Okay. And then on the supervisory/ 15 Q. management ability, the key here, the rating says, 16 17 item 4, supervisory/management ability was "above average performance, exceeds acceptable standards." 18 19 That's the way you rated him for the rating period --20 for the appraisal period of 1/13/09 through 1/12/10; correct? 21 22 Α. That's right. 23 All right. So you were pretty pleased with Q. 24 his performance overall, it appears.

Yes, in that time period, absolutely.

25

Α.

- 1 And even though you rated him down a notch Q. 2 on supervisory/management abilities, you still rated him as exceeding acceptable standards. 3 Α. 4 Right. 5 Okay. And I'm looking at page 3 of this Q. 6 document, which is Bates stamped 1792. You state, with 7 respect to supervisory/management ability, "Mr. Bostock acts as a leader both in his division and within the 8 9 court as a whole. He has effectively implemented new procedures for his division during the rating period 10 and has promoted a more productive work environment 11 12 with higher employee morale." 13 Those are your words; correct? 14 Α. Correct. Okay. And was this the first time that you 15 Q. were able to do a performance review of Gerald? 16 17 Α. I believe so. Okay. Let's look at Exhibit 33. 18 0. 19 (Exhibit Number P-33 was presented.)
- 20 BY MR. BUCKLEY:
- Q. And just by the way, Mr. Slay, before I
 forget, on Exhibit 32, second page of that document,
 that is your signature where it says supervisor's
 signature; right?
- 25 A. It is.

89

	video Deposition
1	Q. And beneath that is John Johnson's signature
2	as well; is that right?
3	A. Yes, sir.
4	Q. Did Johnson actually participate in the
5	review, or was he simply approving the review?
6	A. Approving the review.
7	Q. Okay. So Johnson didn't disagree with
8	anything you said in this document.
9	A. I would assume that's why he had signed it,
10	yes, sir.
11	Q. Has he ever disagreed with any of your
12	performance reviews, to your recollection?
13	A. There's been a time where we've had
14	conversations about a particular element of a review
15	for an employee or two.
16	Q. Okay. Has he ever pushed back on a rating
17	that you gave an employee in a particular area?
18	A. I think once or twice.
19	Q. Okay. Have you changed your review because
20	Mr. Johnson pushed back in that way?
21	A. No, sir.
22	Q. Okay. He's
23	A. Not that I recall.
24	Q pushed back, but you've stuck by your

guns, it sounds like.

90

1 Α. Yes, sir. 2 Q. Okay. And, in point of fact, you're the person who had more day-to-day opportunity to observe 3 employee performance of the people who reported to you; 4 5 correct? 6 Yes, sir. Α. 7 0. Okay. All right. So let's look at 8 Exhibit 33. And this is a document captioned 9 Performance Evaluation Report, Gerald Bostock. And it says -- I'm looking -- by the way, it's Bates stamped 10 Clayton 1782 through 1788. And it is -- it says --11 it's a little bit different form, but it says, "FYE 12 13 6/30/2011." Do you see that? 14 Yes, sir. Α. 15 And so I just want to be clear. So that is Q. 16 the fiscal year from about June of 2010 to June of 17 2011? Yeah, fiscal -- July to June. 18 Α. 19 Q. July --20 -- of 2011. Α. 21 July 1 --Q. 22 Α. Yeah. 23 -- 2010 to --Q. 24 Α. June 30th. -- June 30th of 2011? 25 0.

91

1 Right. Α. 2 Q. Okay. And so you did this evaluation as well, and that's your signature on the first page; 3 4 right? 5 It is. Α. And you rated Gerald a 40 -- total score of 6 Q. 7 46 out of a possible 50; right? 8 Α. That's right.

- Q. With 5s in the majority of categories, 4s in decision making and problem solving and interpersonal relations as well; right?
- 12 A. That's right.

9

10

11

13

14

15

16

17

18

19

20

21

22

23

24

- Q. And then down in supervisory/management ability, you rated him a 3, which was "average performance, meets acceptable standards." Correct?
 - A. That's right.
- Q. And looking at the second page of this document, with respect to supervisory/management ability, you actually didn't have any comment -- oh, wait. No, you did. "Mr. Bostock has experienced some significant leadership challenges among his staff this year; but to his credit, he has accepted the coaching and intervention imposed by the administration with poise and grace and has demonstrated a willingness to work on the issues."

92

1 That's your -- those are your words; right? 2 Α. Yes. And with respect to rule conformance 3 Q. you said, "Mr. Bostock knows and follows departmental 4 5 rules and procedures, and he rarely has to be reminded 6 His attendance was good during the rating of them. 7 period." 8 Now, did you -- did Mr. Bostock at some 9 point start sending you the financial information that he was providing to the Friends of Clayton County CASA 10 board? 11 12 He was instructed by Mr. Johnson, I believe, 13 originally to start providing copies of the bank 14 statements. When was that instruction? 15 Q. I want to say early 2012. 16 Α. 17 Q. Okay. Or maybe late 2011, somewhere in there. 18 Α. 19 And you received those, and you reviewed Q. 20 them when you received them; right? I received them most of the time. 21 Α. were some times where it either wasn't -- it was 22 23 forgotten or it wasn't given. 24 Q. Okay. But, yeah, I did look through them and pass 25 Α.

93

1 along to Mr. Johnson. 2 Q. Did you ever write him up or anything for not submitting --3 Didn't write him up. I believe there was a 4 Α. 5 couple of times where I had to email him to get the 6 report. 7 0. Okay. All right. Let me show you what's marked as Plaintiff's Exhibit 34. 8 9 (Exhibit Number P-34 was presented.) BY MR. BUCKLEY: 10 Now, this is a memorandum, captioned a 11 Q. memorandum, dated April 29th, 2013; right? 12 13 Α. That's right. And it's -- it says subject is a four-month 14 Q. performance review. So it's a four-month performance 15 review for calendar year 2013? 16 17 Α. For the fiscal year, yes, sir. This was a -- I would call it an informal review. 18 19 Q. Okay. 20 Sort of a midyear --Α. 21 Q. Okay. 22 Α. -- type of meeting. 23 Okay. It's a largely positive review; Q. 24 correct? 25 Α. Yes, sir.

94

1 And in terms of -- it looks like you Q. Okay. 2 used the same rating system, right, 5s, 4s --Α. Right. And there's the official performance 3 evaluation. 4 5 5 being an outstanding performance, 4 being Q. above-average performance. And indeed -- let's see --6 7 you rated him a 5 or a 4 in every category except on 8 productivity. Quantity of work, you rated him a 3, 9 average, and said, "The rating in this element was lowered due to the missed meetings and late reports 10 previously discussed. As a whole, you do a good job 11 12 keeping up with the various requirements and deadlines 13 involved with your unit." When you say "late reports," is that what 14 you're taking about, there were some missed --15 16 Α. I don't recall the details of it. It could I don't know. 17 be. Do you know if they were perhaps reports of 18 Q. 19 juvenile court proceedings? 20 I don't recall. Α. 21 Q. Okay.

22

23

24

25

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

Q. Okay.

-- about performance --Α.

95

1 Overall though you'd --Q. Okay. 2 Α. -- measures and things. -- say this is a good review; right? 3 Q. Α. Yeah. 4 5 It's a 45 out of a possible 50? That's the Q. 6 That's my math coming from an English 7 major's quick and dirty calculation. That sound 8 correct? 9 Yes, sir, I believe that's right. Α. And you actually gave him this review after 10 Q. you received that email from Mr. Black; right? 11 12 Α. Right. 13 Q. Okay. So the Black email, at least at that point in time, really didn't faze you in terms of 14 15 Gerald's overall performance, did it? 16 Α. It was an accusation. It hadn't been 17 investigated, so I'm not going to hold him to account for something that hasn't been investigated. 18 19 Q. An accusation by somebody who'd just lost 20 his job; right? 21 Α. Yeah. 22 Q. And you are a discerning man. You weighed 23 that fact, that the fellow had just lost a job and

wasn't happy and felt the need to lash out a little bit

24

25

at his manager; right?

96

1 Well, I would say I certainly try to Α. 2 consider, you know, motives in a situation like that. 3 Q. Okay. You know, what they might be, I certainly --4 Α. 5 you can never really know --6 Q. Okay. 7 Α. -- without other evidence. 8 All right. So his -- I just want to be Q. 9 clear. Black's email did not prompt the audit; right? It did not prompt the audit. The audits 10 Α. were scheduled independent of the courts. So, if I 11 12 remember correctly, the audit that year was new in the 13 way that they were doing them. 14 Q. Okay. And we were notified by the internal audit 15 Α. 16 department that they would be conducting audits of all 17 the juvenile court accounts. 18

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

A. No.

19

20

21

22

23

24

25

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

97

1 about Black, Mr. Black. He was basically -- his job 2 was funded by a grant, right, a two-year grant? I don't remember if it was two years, but it 3 Α. was grant funded. I don't recall --4 5 Q. Okay. 6 -- exactly the time. Α. 7 ο. And grants, if they're not renewed, they 8 expire; right? 9 Α. Correct. Okay. And your recollection is the grant 10 Q. that funded that position held by Black expired; right? 11 12 Α. That's right. And that same grant funded 13 other positions who -- you know, those folks also --14 Q. Okay. Α. -- lost -- some of them lost their job. 15 And at the time that Black's funding 16 Q. 17 expired, I guess the county had an option of maybe separately picking up funding for his position? 18 19 Α. That has happened in the past. It didn't 20 happen with that particular -- that was all -- the county was still dealing with the fallout from the 21 financial crisis in 2008. 22 23 Q. Okay. 24 Α. So --25 Didn't have the money? Q.

98

1 Α. Right. 2 Q. Okay. So Black's position basically timed out, and the county elected, either by necessity or by 3 choice, to not separately fund that position --4 5 Pick that up, no, sir. Α. 6 -- so that Black would have an ongoing job? Q. 7 Α. Correct. 8 Okay. So I want to ask you a couple of more Q. 9 questions about the GAL funds. We'll ask other questions, but I want to get this right. Gerald 10 provided monthly reports with copies of bank statements 11 regarding the GAL funds; is that right? 12 13 He provided copies of bank statements, and I recall on several of them he would write sort of an 14 explanation for what that --15 16 Right. Q. 17 Α. -- particular expenditure was. Here's an expenditure, here's what it was 18 Q. 19 for. 20 Right. Α. And he would write that out; and you, as his 21 Q. supervisor, received that. Did anybody else receive it 22 23 besides you? 24 Α. Mr. Johnson.

25

Q.

Okay.

	<u>-</u>
1	A. Well, I forwarded them to Mr. Johnson.
2	Q. You forwarded. Okay. Complete with his
3	hand notations
4	A. Right.
5	Q and whatnot. And generally did you find
6	Gerald's explanations for the expenditure of these
7	funds satisfactory?
8	A. I would say yeah. I didn't nothing flew
9	off the page as inappropriate.
10	Q. Okay. Right.
11	A. But I would say too there were often line
12	items that would have no explanation.
13	Q. Okay. Did you ever ask him for an
14	explanation on anything after you got a report, say,
15	"Hey, I'd like to know what this expenditure was for"?
16	A. I don't recall doing so. I know Mr. Johnson
17	did
18	Q. Okay.
19	A a few times maybe.
20	Q. Okay. Do you know if Mr. Johnson got
21	satisfactory explanations?
22	A. I don't know.
23	Q. Okay. But you had the option of doing that
24	if you wanted to; right?
25	A. Sure, if I saw something that stood out to

100

1 me, yeah. 2 Q. Okay. I have to say, though, those things were 3 Α. almost pass through. I didn't know what I was looking 4 5 for or really --6 Q. Okay. 7 -- have a whole lot of understanding of how 8 that all functioned. I was --9 But you didn't at the time have any feeling Q. that Gerald wasn't being transparent about what he was 10 doing with the money. 11 I didn't know. 12 Α. 13 Q. Okay. And I guess if he wasn't being transparent, he would have not submitted the reports; 14 15 right? That's fair. 16 Α. 17 Q. All right. So, anyway, so --But there were times he didn't submit them, 18 Α. 19 so --20 Q. Okay. -- just for the record. 21 Α. But then did you ask him to submit them 22 Q. 23 and --24 I asked, and sometimes we got them. There Α. 25 -- when you go back through the records, there are

101

months that are missing.

Q. Okay.

1

2

3

10

11

13

14

15

16

- Α. Complete months.
- I looked through the performance review 4 Q. 5 pretty carefully. I didn't see anything about where 6 you expressed any concern about any of that in the 7 review.
- 8 Α. Well, that could have been alluded to with 9 the missing reports. I don't recall that.
 - Q. Okay.
- Being specific. But that was noted in that Α. 12 performance evaluation.
 - Q. Did you ever conclude, once you -- once the audit occurred, did you ever conclude that the devil was in the detail of the missing reports, that, gee, whiz, that was where he was engaging in some misconduct or anything of that nature?
- After the audit? 18 Α.
- 19 Q. Yes, sir.
- 20 So after the audit, that did stand out to me Α. as a potential red flag after, you know, being made 21 aware of some of the other concerns. 22
- 23 Q. Okay.
- 24 You know, I think that would obviously stand Α. 25 out to most people.

1	Q. As a potential red flag, but what I'm asking
2	you is did you ever specifically learn that any of the
3	reports that were not submitted to you contained
4	evidence of any financial wrongdoing or anything of
5	that nature?
6	A. We never got them, so there's no way to
7	conclude that.
8	Q. Okay. Didn't you all seek to get those
9	reports from Clayton County CASA where he was also
10	providing Friends of Clayton County CASA when he was
11	also where he was also providing those reports?
12	A. I believe so, but I don't
13	Q. Okay.
14	A. I wasn't involved in that.
15	Q. Okay. The notations that he made on the
16	bank statements about the nature of expenditures, that
17	was at your request, wasn't it?
18	A. I believe Mr. Johnson's request.
19	Q. Okay. Was that a request through you?
20	A. Possibly.
21	Q. If Gerald remembered that you were the
22	person requesting it, you wouldn't really argue with
23	that, would you?
24	A. Not necessarily. I mean, it came from
25	Q. Okay.

- A. -- his chain of command, whether it was originated with Mr. Johnson or it was a pass through from me. I don't recall that exactly.
- Q. Prior to the audit, do you remember either you or Mr. Johnson raising any concerns about any of the financial reports that were submitted to you?
 - A. I know Mr. Johnson had concerns.
- Q. Okay. When you say "had concerns," tell me what you mean.
- A. Mr. Johnson never shared with me any detail, but it was obvious from my own observations that he -there was some discomfort or suspicion about this going back as far as I want to say November of 2010. But the details of that were never shared with me, so I wasn't aware of what Mr. Johnson's concerns were. I just know that --
 - Q. Okay.

- A. -- by his own actions and some of the
 directives he gave me, there must have been something
 he was concerned with.
 - Q. Did he ever express to you a distaste or dislike for Gerald?
 - A. Not per se. I think he -- he clearly expressed some frustration during those times when Gerald was having the issues with his employees and,

104

1 you know, expressed some frustration and, you know, 2 disappointment about the way some of that stuff had been handled. 3 Did Mr. Johnson ever make any comments to 4 Q. 5 you about Gerald's sexual orientation? 6 The only thing he made was after all of this Α. 7 happened. 8 Q. What did he say? 9 I'm sorry? Α. What did he say? 10 Q. Oh, he mentioned, when we were going through 11 Α. 12 the discovery process, that there -- somewhere there 13 was -- I don't remember if it was documents or if it was like -- something to do with computer and 14 photographs being on a computer that had pornography on 15 16 them. Okay. 17 Q. But that occurred whenever the discovery --18 19 I don't remember when the discovery -- about a year or 20 so ago maybe when all of the --When you say that occurred a year or so ago, 21 Q. the issue came up a year or so ago, but the actual 22 23 issue was much, much further back in time in 24 Gerald's --

I believe --

25

Α.

105

1 -- employment? Q. 2 Α. Yeah, I believe all of that occurred --3 Q. Okay. -- very early on. 4 Α. 5 And what did he say about that? Q. That he should have been terminated for 6 Α. 7 having that stuff on his work computer at that time. Okay. All right. Does your wife work in 8 Q. 9 the probation department? Α. Not anymore. She retired this summer. 10 She actually worked in the intake unit. 11 12 Q. Okay. And, again, what is your wife's first 13 name? Catherine. 14 Α. 15 Q. Catherine with a C. 16 C, yeah. Α. Did Judge Teske at some point issue an order 17 Q. barring Catherine from his courtroom because of some 18 dispute he was having with another judge with whom she 19 20 had a good working relationship or to whom she reported? 21 With Cathy? 22 Α. 23 Q. Yep. 24 Α. No. Was she ever barred from his courtroom? 25 0.

1	A. She was never barred from any courtroom. If
2	you're barred from a courtroom, it's going to be hard
3	for you to work at the juvenile court.
4	Q. I would think so, but I'm just
5	A. No, that never happened.
6	Q. Okay. So I want to show you what's marked
7	as Plaintiff's Exhibit 20.
8	(Exhibit Number P-20 was presented.)
9	BY MR. BUCKLEY:
10	Q. This is a memorandum dated June 7th, 2013,
11	and it's Bates stamped Clayton 312 through 314. It
12	appears to be signed by you, Mr. Slay. Is that your
13	signature on the third page?
14	A. It is.
15	Q. And your signature is dated 6/7/2013; right?
16	A. That's correct.
17	Q. Okay. So this is after Mr. Bostock was
18	terminated?
19	A. That's right.
20	Q. Okay. Why after Gerald was terminated did
21	you feel the need to write this memorandum?
22	A. So shortly after Mr. Bostock's termination,
23	Judge Teske and I and I don't remember if John was
24	there, but we actually went to meet with DA Tracy
25	Lawson and her chief investigator.

1	Q. Okay.
2	A. And, actually, to answer your question, so I
3	was directed by the investigator to make a statement of
4	my involvement with everything.
5	Q. When you say your investigator, you're
6	talking about Mr. Crenshaw?
7	A. It was actually Paul I don't remember
8	I can't remember his last name, but he was the chief
9	investigator. The investigation was assigned to
10	Mr. Crenshaw.
11	Q. He was the investigator for the DA's office?
12	A. DA's office, yes.
13	Q. Now, the DA never none of the
14	investigation ever resulted in any sort of
15	indictment
16	A. No, sir.
17	Q or arrest or anything like that?
18	A. No.
19	Q. And the DA, did the DA ever tell you why
20	did the DA tell you that there was not adequate
21	evidence?
22	A. Basically that there was not enough they
23	didn't have enough evidence to present to the grand
24	jury.
25	Q. Okay. Was that Mr. Crenshaw that told you

108

1 that? I don't believe I ever had a conversation. 2 Α. I believe the conversation occurred between Judge Teske 3 and Tracy Lawson, and Judge Teske I think was the one 4 5 that told me. Q. Okay. Did he express disappointment about 6 7 that? 8 Α. No. 9 Q. Okay. The investigation -- the meeting with the 10 Α. DA's office was more of a checking the box kind of 11 12 thing. 13 Q. Okay. Α. Just making sure there wasn't -- we didn't 14 want to be looked upon as being negligent because we 15 didn't make the DA's office aware of the situation. 16 17 Q. Okay. Who was -- whose decision was it to refer the matter to the DA's office? Was it yours? 18 19 Α. Judge Teske. 20 Teske. Okay. And he did this, what, 0. shortly after Gerald was terminated? 21 Yes, it was in very close succession. I 22 23 don't recall exactly --24 Q. Okay. 25 -- the dates. Α.

109

1 Q. You were present in a meeting with Sabrina 2 Crawford at or about the time of Gerald's termination; 3 right? 4 Α. Yes. 5 You and Judge Teske went over to her car Q. dealership; right? 6 7 Α. That's right. 8 Q. Okay. And told her he was going to be 9 fired; right? I think what Judge Teske said, that there 10 Α. was probable adverse action. 11 12 Q. Okay. 13 Α. Termination occurring. And he actually --14 Q. 15 Α. Or about to occur. 16 He actually told her that the news media may Q. be contacting her; right? 17 I believe so. 18 Α. Okay. Why did, if you know, did Judge Teske 19 Q. 20 choose to make this -- to take this matter to the news 21 media, Gerald's termination? I object to the form of the 22 MR. HILL:

I have no idea about his motive or --

23

24

25

question.

Α.

110

BY MR. BUCKLEY: 1 2 Q. But did he tell you he was going to take it to the news media, that he was going to contact the 3 news media about this? 4 5 I believe I was informed the news media had Α. 6 contacted him. 7 Q. Okay. 8 Α. If I recall correctly. 9 Before or after the termination? Q. I believe it was afterward. 10 Α. Richard Belcher? 11 Q. 12 Α. I believe so. 13 Q. And you say you were told that. Who told you that? 14 15 Α. I think Judge Teske told me. Now, you all went to -- in any event, 16 Q. 17 you all informed Ms. Crawford, who at the time was the chair of Friends of CASA, Friends of Clayton County 18 19 CASA. 20 That's right. Α. Right? And she was -- she and her board, 21 Q. they were the people that Mr. Bostock reported to 22 23 separate and apart from reporting to you in your job. 24 Α. That's right.

25

Q.

And he reported to them because he

111

was working with them and their funds and their 1 2 volunteers; right? That's right. 3 Α. Okay. And, to your knowledge, he did submit 4 Q. 5 regular financial reports to them; correct? 6 I don't -- I was never a participant of any 7 of the board meetings, so I don't know how that 8 happened. 9 In that conversation at Ms. Crawford's 0. dealership, did Judge Teske specifically reference 10 Gerald's expenditure of funds at a gay bar? 11 I believe he highlighted all of the things 12 Α. 13 that were brought out in the audit. As to the specific language he used, I -- I don't really remember. 14 Well, you don't remember whether he hit his 15

CASA funds, at a gay bar?

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

fist on a table and said that he was spending money,

- Q. If Ms. Crawford testified that he did, would you disagree with that testimony?
 - A. I don't recall that.
- 23 Q. Okay.

16

17

18

19

22

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

112

1 Right. Q. 2 Α. -- off the dealership floor. All right. 3 Q. And it was -- my recollection of it was that 4 Α. 5 it was very cordial and professional. 6 Well, you just said you don't recall it, and 7 we've talked about you're not recalling a few other 8 things. And I realize time marches on; right? 9 Yeah. Α. You're saying you don't recall that. 10 Q. Ms. Crawford so testified, and I'll represent to you 11 12 that she has in her deposition in this case, would you 13 dispute that testimony, or is your testimony I just don't remember that? 14 My testimony is I don't remember that. 15 Α. I'm not going to sit here and call the lady a liar. 16 don't recall. That was --17 18 Q. All right. 19 Α. -- nearly nine years ago. 20 You know Ms. Crawford; right? Q. Yeah, I do. 21 Α. You have a good relationship with her. 22 Q. 23 Absolutely. Α. 24 She's a person of integrity, isn't she? Q.

In my experience, she has

I believe so.

25

Α.

113

1 been.

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- Q. Right. And she's also a person, it sounds to me at least with all of her charitable work, she's a person with a good heart as well.
 - I would absolutely say that. Α.
- Okay. Did she in that -- did Judge Teske in Q. that meeting tell her that Gerald had made the decision to sponsor a gay softball team with Friends of CASA funds?
- He may have said that because, as I said Α. before, he sort of went through the -- I remember him going through the highlights of the audit and the concerns that were raised in the audit, and that was one of those concerns.
- Okay. And so if she testified that he said Q. that, you wouldn't dispute that either; right?
- I -- again, I mean, I don't recall the Α. details of that meeting, the specifics of it, what was said necessarily. I have a general recollection of it, but it was a brief -- relatively brief meeting and --
- Did you ever hear of a bar in Midtown Q. Atlanta called Frogs?
 - Α. I've seen it in the audit report.
- Okay. To your knowledge, is that a gay bar? Q.
- I have no clue. Α.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

114

Let's assume for the sake of Q. Okay. discussion that Gerald was engaged in a recruiting event at a gay bar. Would that be an improper use of Friends of Clayton County CASA funds? Α. Not in and of itself, no. Okay. And looking back at the MOU, there is Q. no prohibition against that kind of activity in terms of what it says he can do or not do; right? No. Right, no. Α. Okay. All right. So let's go back to this Q. memorandum that you wrote dated June 7, 2013. You --I'm not going to -- we're not going to go line by line, but we are going to go over some of the things you say in here. You said in -- I'm looking at the third paragraph. "On October 12, 2011, I received instructions from Mr. Johnson to investigate the receipt of monies by Carol Gossett, a court officer at the time assigned to Child Welfare Services, in relation to the Guardian Ad Litem program, a joint venture of the juvenile court and Clayton County Superior Court. The scope of my instruction was to investigate how the money was collected and the documentation process of those receipts." So Carol Gossett is actually Gerald's

replacement in his position; correct?

115

1 Α. She was appointed to take that position, 2 yes. After he was fired? 3 Q. Α. Right. 4 5 And I want to be clear. She was -- what was Q. 6 her job in the Clayton County Juvenile Court? She was the -- I believe her title was CASA 7 volunteer supervisor, but her primary responsibility 8 was to conduct the -- to handle the superior court GAL 9 cases, which involved her sometimes or a volunteer 10 doing home evaluations. 11 12 Q. Okay. 13 Α. That sort of thing. But she's an employee of Clayton County 14 Q. 15 Superior Court; right? 16 No, she worked for the juvenile court. Α. 17 Q. I'm sorry. Excuse me. 18 Α. Yeah. I said superior. 19 Q. 20 Right. Α. 21 Juvenile. Q. Juvenile. 22 Α. 23 She was an employee of Clayton County Q. Juvenile Court. 24

25

Α.

Correct.

And Mr. Bostock was her direct

116

1 supervisor. 2 Q. Okay. And when you're talking here about -in your memorandum about "investigate the receipt of 3 monies by Carol Gossett," are you specifically 4 5 referring to monies that ended up being paid into 6 Clayton -- Friends of Clayton County CASA? 7 Α. Correct, the GAL program. 8 Q. Okay. The GAL program. 9 Yeah. Α. All right. So -- and I want to be clear 10 Q. because the MOU actually says they're to be made out to 11 Friends of Clayton County CASA, care of Gerald Bostock. 12 13 That's what the MOU says; right? 14 That's right. Α. So would Ms. Gossett receive the check, and 15 Q. 16 then it would be deposited in Friends of Clayton County CASA? Is that how that worked? 17 Well, what I found was pretty much anybody 18 Α. in the Child Welfare Services unit would take money as 19 20 it was delivered, take checks, money orders. 21 Q. Okay. 22 Α. Those were then turned over to 23 Mr. Bostock --24 Q. Right. -- who handled the deposit with the Friends. 25 Α.

117

But those checks or money orders were Q. supposed to be made out to Friends of Clayton County --

Α. Correct.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

21

- -- CASA; right? Q.
- Right, right. Α.
- Okay. And so you said here, third Q. paragraph, "My investigation found that the monies associated with the program were being collected and deposited in accordance with the 2007 memorandum of understanding between the juvenile court and superior court and that there was a process for recording those receipts. Following the investigation, Mr. Johnson requested that Mr. Bostock start providing copies of the bank statements from the GAL account. Mr. Bostock did so, albeit on an inconsistent basis."

So your investigation found -- and I just want to be clear. He asked you to investigate the receipt of these monies. Did he at that time suggest that he thought there was any impropriety or anything like that?

- 20
 - Provided no context or background. Α.
- 22 Q. Okay.
- 23 I was just given that instruction. Α.
- 24 Q. So you investigated it, and you found that the procedures sort of generally outlined in the MOU 25

118

were being followed and that the funds were being properly deposited.

- A. There was nothing that I looked at that raised suspicion about how the money was collected, and --
- Q. Okay.

1

2

3

4

5

6

10

14

15

- 7 A. -- so I concluded that it's in line with the 8 MOU. You know, money's not --
- 9 Q. Okay.
 - A. -- is going where it's supposed to go.
- Q. Did you look at Friends of Clayton County
 CASA bank records at all during that period of time
 when you were doing that initial 2011 investigation?
 - A. I don't recall doing that. I think my investigation really was limited to asking questions of Mr. Bostock and Ms. Gossett.
- 17 Q. Okay.
- A. And understanding the process of how it was received. I didn't -- I didn't look at expenditures at all or any of that.
- Q. Okay. So let's go to the next paragraph.
 You say, "In late January 2013, I became aware of an
 email a former employee, Shawn Black, sent Mr. Johnson
 raising concern about how the GAL monies and other
 funds collected by Friends of Clayton County CASA were

being spent by Gerald Bostock." And you go on to say,
"Mr. Black shared that the funds, the primary purpose
of which are to support the CASA program with volunteer
recruitment, retention, and training, were being spent
on meals, alcohol, and other personal expenses by
Mr. Bostock." You said, "While the matter was greatly
concerning, because the money in question all belongs
to FCCC" -- Friends of Clayton County CASA; right?

- A. Uh-huh (affirmative).
- Q. -- "a separate nonprofit organization for which we have no authority or oversight, Mr. Johnson and I struggled with how to go about looking into the matter without overstepping our legitimate authority."

 Correct?
 - A. Correct.

- Q. And so at that time, at least at the time of the Black email, you concluded these aren't funds we really have authority over, so we can't look into how they're being spent or whether they're being spent appropriately or anything else. Is that the gist of what you all concluded at that point?
- A. That was the conclusion, but there was the tension of Mr. Bostock being an employee of the county and having direct access and spending authority, debit cards issued in his name.

video Deposition		
1	Q.	Right.
2	A.	That was the tension. That's the
3	connection	·
4	Q.	Okay.
5	A.	between we have an employee who is
6	spending this money and it appears with little or no	
7	oversight.	
8	Q.	Okay.
9	A.	We have these accusations that it's being
10	misspent.	
11	Q.	Okay.
12	A.	The tension is how do we go about
13	investigating that. I don't feel like I can walk into	
14	Sabrina Crawford's office and demand the bank	
15	statements.	
16	Q.	Right.
17	A.	At my level of authority at this point.
18	Q.	Okay. And even though you had these
19	allegations from Black, shortly after you had received	
20	those allegations, you wrote a very positive	
21	performance review of Gerald; correct?	
22	A.	Well, you can't put something in writing for
23	which you	have no evidence.
24	Q.	Right. And so
25	A.	At that point they were all just

121

1 allegations. 2 Q. Okay. And so -- and then you say, "In late March 2013, we were notified by Internal Audit that 3 they would soon be conducting routine audits of all 4 5 cash handling, countywide. Seeing this as an 6 opportunity, on the day of our audit, Mr. Johnson asked 7 the auditors to look into the handling of GAL funds since those funds were being collected by county 8 9 employees in the Child Welfare Services unit." That's a true statement; right? 10 Yes, sir. 11 Α. 12 Q. Okay. And it says, "The auditors 13 interviewed Mr. Bostock, and on April 23, 2013, Mr. Johnson was notified by Stacey Merritt, director of 14 Internal Audit, that the GAL funds needed further 15 investigation due to red flags raised during her 16 17 interview of Mr. Bostock." Let me ask you this question. Once you saw 18 19 this opportunity, as you say, was this -- was it 20 Johnson who said -- asked the auditors to -- did he tell you to ask the auditors to look into the use of 21 GAL funds or did Johnson? 22 23 Α. He asked. 24 Q. Okay. And did he then ask Clayton County --

Friends of Clayton County CASA to provide their

122

1 records, their bank records? 2 Α. Mr. Johnson? Yeah. 3 Q. No. When Stacey Merritt came back and told 4 Α. 5 John --6 Q. Okay. 7 Α. -- there were red flags --8 Q. Okay. 9 -- John and I then went to Judge Teske to Α. brief him on the information. 10 11 Q. Okay. 12 Α. He --13 Q. Sorry. Go ahead. He instructed John to get in touch with 14 Α. 15 Chairman Turner, the chairman of the Clayton County 16 Commission --17 Q. Okay. -- to ask for authority for Internal Audit 18 19 to look at those bank accounts, which Chairman Turner 20 provided. Do you -- did Ms. Merritt or Mr. Johnson 21 Q. tell you what these red flags were that are referred to 22 23 here in your memorandum? 24 Α. I recall the missing records, the expense on items that Mr. Bostock appeared to personally benefit 25

from, the lack of oversight or policies and procedures around the governance of how those funds were to be spent, all of those things I recall being mentioned as red flags.

- Q. Okay. And let me be clear on what -- let's go through each of these things, categories. Expense on items Gerald Bostock benefited from, what are you referring to there? Are you referring to having a meal with somebody or what?
- A. I believe that was part of it, but I believe -- yeah, that was part of it, meals and drinks with -- that he was benefitting from. But also the sponsorship of the softball team, of which he played --
- 14 Q. Okay.

1

2

3

4

5

6

7

8

9

10

11

12

13

19

20

21

22

23

25

- 15 A. -- that was -- I remember the term conflict
 16 of interest --
- 17 Q. Right.
- 18 A. -- being floated for that.
 - Q. There's nothing at all in the MOU, which is Exhibit 3 in front of you, that says any -- that has any sort of guidelines for what might constitute a conflict of interest for Gerald Bostock, nothing in there that says --
- A. No, not in the MOU.
 - Q. Okay.

124

- A. There are --
- Q. Right.

1

2

3

4

16

17

18

19

20

21

22

- A. -- statements of policy with the county that talk about conflict of interest and ethics, but --
- 5 And in terms of -- in terms of that, if he Q. 6 was using the Honey Badgers team to recruit, I mean, 7 any time a person -- let me back up. If Gerald were 8 trying to recruit an individual to be a volunteer and 9 he took that individual out for lunch -- well, Gerald would benefit by that lunch because he's getting a meal 10 and sustenance, but he's also engaging in CASA-related 11 12 activity. Are you saying the mere fact that Gerald 13 consumed something at that lunch means that he benefited by that and, therefore, that that's a 14 conflict of interest? 15
 - A. Well, I think I would question -- the conflict of interest becomes repeated meals with the same person. My question is why does it take that many meals to recruit a volunteer? We're not a Fortune 500 company out swooning clients. We're a government organization looking for volunteers for kids.
 - Q. Right.
- A. And, again, the alcohol issue with regard to that was concerning.
 - Q. When you say "repeated meals with the same

125

1 person," who is that same person you're referring to? 2 Α. I don't recall the name, but there were -there was a fellow, I believe he worked as -- for AT&T. 3 Maybe it's Chris Burton. I don't remember for sure the 4 5 name. I know there were repeated meetings, dinner 6 meetings, you know, that involved alcohol with him. And you do seem -- I understand you don't 7 8 like the alcohol issue. 9 Α. Right. Do you know whether Gerald was obtaining 10 Q. approval for these events from the Friends of Clayton 11 12 County CASA board? 13 Α. I have no idea. Okay. That's beyond the scope of your 14 Q. knowledge. 15 Α. Right. 16 17 Q. Okay. So you say, "Specifically, Ms. Merritt expressed concern about the record keeping 18 19 and Mr. Bostock's level of authority to use the funds 20 at his discretion." The level of authority to use the funds was 21 basically a function of the MOU and whatever the 22 Clayton County -- Friends of Clayton County CASA board 23 24 authorized him to do; right?

25

Α.

Except that the bylaws of the Friends of

126

Clayton County CASA specifically state that 1 2 expenditures are to be approved by the chairperson and that expenditures over \$500 are to be signed off on by 3 the chairperson and the treasurer. 4 5 And Ms. Crawford would be that chairperson Q. for the --6 7 Α. Correct. 8 Q. -- relevant time period; right? 9 Yeah, for I think most of the period, if not Α. all. 10 Didn't she tell y'all in that meeting that 11 Q. y'all had in her dealership that she approved the 12 13 expenditure of money to sponsor the Honey Badgers baseball team? 14 15 Α. What I recall is that she said something to 16 the effect of he told us about it. 17 Q. Right. Okay. Her and another board member, not at a --18 19 specifically at like a full board meeting. 20 But if he just needs the chair's approval, 0. then he told her; right? 21 22 Α. I suppose so. I wasn't there. I have no 23 clue if that happened or not, but --24 Q. Okay. Yeah, but she told you she did. 25 That's what she told me, right. Α.

Q. All right. And you don't think she was lying.

A. No.

3

4

5

6

7

8

9

10

11

12

13

14

15

16

- Q. All right. So -- but the level of authority that he had was tied to, as I understand it, two things, the MOU and whatever discretion the Friends of Clayton County CASA board gave him; right?
 - A. Correct.
- Q. Okay.
- A. As long as what was happening doesn't conflict with county policy or court policy.
- Q. Right. And you know that they gave him some credit cards to use for recruiting and training events?
- A. I believe there were debit cards issued in his name under the GAL account and then I think the general account as well.
- 17 Q. Right. I said credit card, but --
- 18 A. Yeah, debit card.
- 19 -- debit card; right? Okay. So we go on. Q. 20 So Johnson talked to Judge Teske, according to your memorandum. And then on May 1, it says, "Judge Teske 21 directed Johnson to request of Chairman Turner that the 22 23 Internal Audit perform a more thorough audit of the GAL 24 funds," that "Turner agreed and ordered the audit." And you said, "When Mr. Johnson and I notified 25

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

128

Mr. Bostock of the pending audit, he responded by asking what right you had to look into the matter since the money belonged to FCCC and was not the property of the juvenile court." Correct? Right. Α. And, actually, that question was one that Q. you had actually asked yourself per the first page of this memorandum; right? MR. HILL: I object to form. BY MR. BUCKLEY: Well, going back to the second to last Q. paragraph of the first page, you said, "While the matter was greatly concerning because the money in question all belongs to FCCC, a separate nonprofit organization for which we have no authority or oversight, Mr. Johnson and I struggled with how to go about looking into the matter without overstepping our legitimate authority." That was -- those were your words; right? Those are my words. Α.

Q. Yeah. And so Gerald's concern that he expressed to you and I guess Mr. Johnson, you know, what right do you have to look into the matter since the money belongs to FCCC, was not an unreasonable question to ask, was it?

A. To me, it absolutely raised red flags. If you have nothing to hide, you as a county employee know that you have responsibility to the county for your actions. Why not be an open book? And the fact of the matter at this point in the process, we had gone through all the way to the chairman of the Board of Commissioners to get authority. When I said we struggled because we didn't have authority, I was referring to myself and Mr. Johnson. I didn't feel like I had the right to walk into Sabrina's office and ask for, you know, bank statements or demand answers on how things were spent.

Q. Okay.

- A. But since the chairman, Judge Teske all agreed that that was proper and the chairman has the authority to order this as Mr. Bostock is an employee of the county and is involved with this and it's directly related to the work of the county.
- Q. I get it. But, you know, here's the thing.

 Mr. Bostock, yeah, he had a fiduciary obligation to the county.
 - A. Yes.
- Q. But he also had a separate fiduciary obligation to Friends of Clayton County CASA; correct?
 - A. He did, absolutely.

- Q. And that obligation involved all kinds of things, including who and when somebody could just look at their private bank records and that kind of thing.

 So I'm just saying where you question whether -- how and whether you could have the authority yourself,

 Gerald's a pretty intelligent guy.

 A. Sure.
 - Q. You agree?

- A. Absolutely.
- Q. It's not really surprising that he would say, "Well, what right do you have to look at the books of Friends of Clayton County CASA?" That's not surprising since you yourself, another intelligent man, raised the very question; right?
- MR. HILL: Object to the form of the question.
 - A. Again, at this point in the process, the matter of authority has been resolved in my mind. And I know in the past when, for instance, Mr. Johnson directed Gerald to provide the bank statement, there was a reaction similar.
- 22 BY MR. BUCKLEY:
- 23 Q. Okay.
- A. But he did that. If we're already getting the bank statements, why are you objecting now to this

audit being done? It just appears on the surface. I'm not -- I wasn't at that point making an accusation, but it raises a red flag in my mind. It raises honestly some suspicion into my mind that you are opposed to having someone look in on it.

Q. All right. So let's go to the next paragraph. It says, "On May 23rd, 2013, Mr. Johnson and I met with Ms. Merritt and Leslie Moore of Internal Audit to discuss their findings." And it says, "The report showed numerous inconsistencies in record keeping and shared concerns that Mr. Bostock was spending money on items that personally benefited him and was doing so without any direct oversight by the FCCC board of directors, the holder of the funds."

Now, are you talking about the audit report.

Now, are you talking about the audit report, or are you talking about something else, some other document when you say "the report"?

A. The audit report.

- Q. Okay. We're going to look at that. I don't think it quite says that, but that's what you say here.
 - A. Doesn't quite say which part?
- Q. That "the report showed numerous inconsistencies in record keeping and shared concerns that Mr. Bostock was spending money on items that personally benefited him and was doing so without any

132

1 direct oversight by the FCCC board of directors, the 2 holder of the funds." I think the audit report --3 Α. MR. HILL: You can wait --4 5 -- directly says that. Α. MR. HILL: -- for him to ask a question 6 7 first. BY MR. BUCKLEY: 8 9 So my question for you is this: Did you Q. ever interview any of the FCCC board of directors with 10 respect to their oversight? 11 Α. I didn't conduct this investigation. 12 13 Q. Okay. And it says here, your next sentence says, "Money was spent in restaurants and bars to 14 sponsor Mr. Bostock's own softball team and on other 15 questionable purchases." And when you say "his own 16 17 softball team, " you're not saying he owned the team; right? 18 19 Α. The team he was on. 20 The team he was on. 0. He was a member of. 21 Α. And this team he was on was not something 22 Q. 23 that he profited by. It was a -- basically a volunteer 24 activity where a bunch of guys got together and played softball; right? 25

- A. Right, but there's expense involved. I've been on teams before. You have to buy uniforms. You have tournament entry fees, those sorts of things. And if you have a sponsorship that is now paying for that, you're directly benefiting from that sponsorship.
- Q. You have a sponsorship that's paying for the team and is also advertising for Friends of Clayton County CASA; right?
- A. Right, but therein lies the conflict of interest.
- Q. Okay. And the conflict of interest would -so the conflict of interest in your mind would occur if
 he had a meal with somebody and he ate some of the food
 that was paid for?
- A. No. I think the repeated meals that happen after -- you know, at this point we had a brand new juvenile court building with all this meeting space. Everybody else that meets with their volunteers -- and we have other units within the court that have volunteer services.
 - Q. Right.

A. None of them are taking people out to dinner at night in Atlanta repeatedly. None of them are consuming alcoholic beverages that are being paid for through sponsorship funds. None of them are sponsoring

their own softball teams.

- Q. But those are county employees. And if they were doing those things, they would be doing them with county funds; right?
- A. Correct. And Mr. Bostock is held to those same standards. He's a county -- or was a county employee.
- Q. He's a county employee, but the funds involved had oversight by a private board of directors and did not have oversight by any Clayton County official. And Mr. Bostock, in terms of the handling of those funds, was subject to the supervision of that board; right?
- A. Correct. But I would say there's no evidence that there was any oversight or very little oversight of the expenditure of those funds, and that is part of the primary issue. There were no policies and procedures in place.
- Q. Well, when you say there was no oversight, you've already said you didn't interview or talk to any of the board members; right?
 - A. Mr. Bostock had a debit card.
 - Q. Right.
- A. That he with free will made purchases on.

 There was no evidence or documentation that any of

those purchases were approved in advance.

- Q. Do you know if the Friends of Clayton County CASA board gave Gerald the discretion in advance to use that credit card for Friends of Clayton County CASA activities? Do you know if they gave him that discretion?
- A. I don't know if they gave him that discretion.
- Q. Okay. And if they did give him that discretion, was he wrong for relying on that authority in making purchases with that card?
- A. In using funds from the GAL account to purchase alcohol, to sponsor receptions at a softball tournament in Birmingham, Alabama, which I have a hard time believing you're getting any recruits from Alabama for Clayton County CASA. All of that is the issue I had a problem with. If he were doing this with funds strictly from the FCC account, it might be a different conversation.
- Q. Okay. Going back to the MOU, though, it simply says that the funds, the fees, it says, "will use the fees to fund volunteer recruitment, training, and retention."
 - A. Yeah, CASA volunteers.
 - Q. Okay. Right.

136

A. Not volunteers for FCC, volunteers for CASA,
CASA GALs.
Q. All right. So -- all right. Fine. So you

- Q. All right. So -- all right. Fine. So you mentioned something in Birmingham.
 - A. Uh-huh (affirmative).
 - Q. There was a softball event in Birmingham?
- 7 A. Yeah. I believe it was a tournament of the 8 league that --
- 9 Q. Okay.

4

5

- 10 A. -- Mr. Bostock's team was --
- 11 Q. This was --
- 12 A. -- a part of.
- Q. -- the one that -- the Honey Badgers, the team was --
- 15 A. I think that's the name of it, yes.
- Q. Okay. And do you know if those funds were spent with respect to any of the volunteers that were on the Honey Badgers team?
- A. I believe, referencing the tournament in
 Alabama, those funds were spent to provide a reception,
 like, you know, I don't know, hors d'oeuvres and drinks
 or whatever for people that are participating in the
 softball tournament.
- Q. Do you know that, or are you just speculating on that?

137

- A. I think that's what Mr. Bostock responded to in his questionnaire, that it was a light reception, if I remember the wording right.
- Q. Okay. So, in any event, so you in your memorandum -- I mean, I'm just trying to figure out if you're faulting Mr. Bostock for having a debit card issued to him by Friends of Clayton County CASA.
- A. Mr. Bostock was terminated for incompetence, negligence, and conduct unbecoming a county employee. The fact that he never established policies and procedures, a fact that because there weren't records on a lot of the expenses, there weren't proper accounting of things, that was what concluded the fact that disciplinary action had to be taken.
- Q. Well, hang on, because you're not the decision maker here. But you sound like you're --
- A. I was involved in the conversations, so I'm --
- 19 Q. All right. So --

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

- 20 A. -- privy to what --
- 21 Q. -- let's go back to that.
- 22 A. -- the conversation was.
- Q. Are you faulting him for having a debit card issued to him by the board of Friends of Clayton County CASA?

138

1 Not in and of itself, but by not having Α. 2 proper procedures in place for record --3 Q. Okay. -- keeping and authorization. 4 Α. 5 And when you say he didn't have proper Q. 6 procedures for record keeping and authorization, when 7 the Clayton County -- Friends of Clayton County CASA 8 board chair says, "We want to issue you a debit card," 9 because he's spending his own money and then seeking reimbursement and she wants to make it easier for these 10 transactions to occur, does he need to have some 11 12 documentation of the fact that this private charity 13 issued him a debit card for its use? MR. HILL: Object to the form of the 14 15 question. BY MR. BUCKLEY: 17

16

22

23

24

- Q. Go ahead.
- But I believe the audit also showed that --18 19 when I say no record keeping, proper procedures in 20 place, there were expenditures for which there were no receipts produced. 21
 - Q. Okay.
 - There was a reimbursement that was made to Α. Gerald with a check signed by himself. Those are all things that are not standard accounting processes or,

you know, reimbursement techniques. All of that stuff is -- was improper.

- Q. Well, hang on. When you say improper, that's a strong word. Let's --
 - A. Yeah.

- Q. Let's look at that. He was subject to the direction, with respect to the expenditure of these funds, of the Friends of Clayton County board and whatever procedures they set up or didn't set up for him; isn't that right?
- A. Correct. But, again, we're talking about a county employee who you've already said, and I agreed, is a very intelligent person, knows how the county operates when it regards to expend -- when it comes to expenditures, accounting, and all of those things. And the fact that he never took the care to work with the board of FCCC to establish something similar that is in line with accepted accounting practices was the issue.
- Q. But practically speaking, you don't really have any personal knowledge about what care he took with respect to that board, what conversations he had with that board -- hang on -- with respect to expenditures of money or the recording of those expenditures of money. You don't have any personal knowledge concerning those conversations, do you?

140

- 1 A. I don't. But what I see is the result.
- Q. Okay.

3

4

5

6

8

9

10

20

- A. And it appears to several people there is no procedure, that there was no authorization, that he had free access and rein to spend the money how he saw fit.
 - Q. And he may have.
- 7 A. Right.
 - Q. But he was subject to whatever constraints or directions that the Friends of Clayton County CASA board put on him; correct?
- 11 A. Yes.
- 12 Q. Or lack thereof; right?
- A. Correct. But it doesn't abrogate his responsibilities as a county employee.
- Q. Well, what if he was the treasurer of his softball team?
- A. That would be fine. That's not direct -the Friends of Clayton County CASA would not exist if
 there weren't a Clayton County CASA program.
 - Q. Okay.
- A. Their sole mission is to promote and support that program. It's directly tied to the mission of the juvenile court. His softball team is a personal matter that has nothing to do with work.
 - Q. Okay. And yet there -- well, apparently it

141

does because that's one of the reasons --

- A. Well, when he sponsored --
- Q. -- he got fired.
- A. When he starts using court money to sponsor his own softball team, yeah, that's an issue.
 - Q. He did not use court money --
- 7 A. The money was raised through the CASA GAL -- 8 I mean, the superior court GAL program.
- 9 Q. Right.

1

2

3

6

17

- 10 A. Those are not private funds. That money was 11 ordered by a court.
- 12 Q. They're not court funds either.
- A. But it was ordered by a court, and that
 money should be spent in accordance and in the same
 fashion that any other government money should be
 spent.
 - Q. And that is your conclusion, and yet --
- 18 A. It is absolutely.
- Q. -- and yet there is not a single soul or was
 not a single soul on the board of Friends of Clayton
 County CASA who was a court official, and there is a
 reason why there was an independent board set up so
 that they could have independent oversight on how these
 monies were spent. True?
 - A. That's true.

142

Video Deposition 1 Okay. All right. I think we're about to Q. 2 run out of video right now, so this may be a good time to take a break. 3 Α. 4 Okay. 5 A little lunch break. If we go much longer, Q. we'll be at dinner time, so let's do that. 6 7 MR. BUCKLEY: Go off the record, please. THE VIDEOGRAPHER: We're off the record. 8 9 (VIDEO CAMERA OFF.) (A luncheon recess was taken.) 10 (VIDEO CAMERA ON.) 11 THE VIDEOGRAPHER: We're back on the record. 12 13 BY MR. BUCKLEY: All right. We are back on the record, 14 Q. And you understand you're still under 15 Mr. Slay. 16 oath --17 Α. Yes. -- correct? And you've taken a break. 18 0. 19 there any testimony you've given so far that you need 20 to correct or clarify? Not -- not that I can think of, no, sir. 21 Α. All right. Okay. If in the course of this 22 Q. 23 deposition you realize there's anything you need to 24 correct, just say so. Okay?

25

Α.

Okay.

Q. And we'll give you an opportunity to do that or clarify.

A. All right.

Q. So before we took the break, we were looking at Plaintiff's Exhibit 20, which you still have in front of you; right? And we're on page 2 of that document. And we were looking at, I believe, the second paragraph of that page. And you stated in this memorandum that you and Mr. Johnson shared the report with Judge Teske. "He contacted Matt Sorenson, Superior and State Court Administrator, and asked him to advise Chief Superior Court Judge Deborah Benefield of the audit."

Judge Teske, I assume, told you that he did that?

A. I believe he did it while we were all still --

18 Q. Okay.

A. -- in the meeting together.

Q. And then you say, "Judge Teske, Mr. Johnson, and I then went to human resources and met with the auditor, Leslie Moore, and HR director, Renee Bright, to discuss the audit. It was decided in that meeting that Judge Teske would propound a series of questions demanding answers regarding the audit findings from

1	Mr. Bostock. Mr. Johnson and I delivered those
2	questions to Mr. Bostock on May 28th, 2013."
3	These were written questions; correct?
4	A. They were.
5	Q. Okay. And I want to be clear. You said
6	that you shared the report with Judge Teske. That was
7	the audit report?
8	A. That is what I was referring to.
9	Q. Was it the finalized audit report?
10	A. Yes, sir.
11	Q. Okay. And I want to show you an exhibit.
12	Excuse me. One second here.
13	(Exhibit Number P-10 was presented.)
14	BY MR. BUCKLEY:
15	Q. Let me show you what's marked as Exhibit 10.
16	Is that the when you say you showed Judge Teske the
17	audit report, is that the audit report that you showed
18	to Judge Teske?
19	A. Yes, sir.
20	Q. And this is, as I understand it, the final
21	version of the audit report; right?
22	A. That is my understanding, yes.
23	Q. Did you ever see any earlier drafts?
24	A. I don't remember if what we were presented
25	was a draft or if it was the final

145

1 Q. Okay. 2 Α. -- report. Well, do you remember if what you gave to 3 Q. Teske was the final? 4 5 It was this report. Α. 6 Q. Okay. 7 Α. So I'm thinking it was the final, but --8 This report, Plaintiff's Exhibit 10? Q. 9 Yeah. Α. Okay. We'll get back to that document. 10 Q. Let's go back to 20 for a minute. So it says that you 11 12 submitted the questions to Mr. Bostock May 28th and 13 received answers back on May 31st. And you said, "At that time, I demanded that Mr. Bostock surrender the 14 FCCC debit cards and checkbooks. He claimed that the 15 checkbooks were delivered to the FCC treasurer earlier 16 17 that week, and he only produced one debit card drawn on the GAL account. That card was delivered to FCC 18 19 board -- FCCC board chair Sabrina Crawford when Judge 20 Teske and I met with her on May 31, 2013. She was made aware of the pending audit, investigation, and 21 likelihood of adverse action against Mr. Bostock. 22 23 Judge Teske asked her to keep it all confidential." 24 That's the meeting we discussed earlier;

correct?

146

1	A. Right, at her dealership.
2	Q. At her dealership. Okay. Now and so the
3	card was actually so when you say the card was
4	delivered to her, was it you and Judge Teske that
5	delivered the card to her?
6	A. I handed it to her.
7	Q. Okay. Now, again, the FCCC debit card was
8	not really the property of the Clayton County Juvenile
9	Court; correct?
10	A. That's why I returned it to
11	Q. Okay.
12	A Sabrina.
13	Q. Why didn't you just ask Mr. Bostock to
14	return it to Sabrina?
15	A. Well, at that point, the direction we were
16	headed was obviously termination.
17	Q. Had you told him when you asked him for the
18	card back that you all were planning to terminate him?
19	A. I don't remember telling him that. I mean,
20	it was obvious that something was going on.
21	Q. Did you tell him that he was suspended
22	pending further word or anything else, or did you just

Mr. Johnson -- and I don't -- I don't

23

24

25

tell him to go back to work?

A.

147

1 on administrative leave and provided him with a letter 2 of intent to terminate with instructions to report to his office I believe that same day at 4:00 o'clock --3 Was this --Q. 4 5 Α. -- in the afternoon. Was this contemporaneous with you all asking 6 Q. 7 for the card back or shortly thereafter? 8 Α. It was shortly thereafter. It may have been 9 a day or two after that. Seems to me there was a weekend in between those two events. 10 If I'm reading your time line correctly 11 Q. 12 here, you're saying, "We received the answers on 13 May 31. At that time I" -- you -- "demanded that Mr. Bostock surrender the FCCC debit cards and 14 checkbooks." 15 So you got his answers, and you went to him 16 at that point in time and said surrender this stuff? 17 18 Α. Correct. 19 Okay. So had you all at that point -- when Q. 20 I say you all, I guess had Judge Teske at that point stated to you definitively that he was going to 21 terminate Gerald Bostock? 22 23 On May 31st? Α. 24 Q. Yes, sir. 25 Α. Yes.

- Q. Okay. So when you said you were heading in that direction, well, it wasn't that you were still deliberating. The decision had been made.
 - A. After we met with Judge Teske, yes.
- Q. Was the decision made before or after Gerald's answers to the questions were submitted?
 - A. The decision was made after.
 - Q. Okay. How soon afterwards?

- A. Very quickly, if I recall. I don't remember if it was the same day, but it would have been in very short succession.
- Q. Was there something in his answers to questions that triggered that decision?
 - A. I think the answers to his questions did not alleviate the concerns that were held by Judge Teske, John, and I.
 - Q. Can you give me any specifics? What were the concerns that were not alleviated by his answers?
 - A. The explanations for the dinners with the same people over and over and how that contributed to CASA volunteers, not volunteers for FCC but CASA volunteers, because those funds, again, were taken from the GAL account, which is supposed to recruit CASA volunteers. I think there's an important distinction that should be observed, and that is two sets of

149

volunteers work with Mr. Bostock, and he recruited
both. One was for the FCC to do fundraising events and
things like that. The other was people to serve in
that GAL role. And the GAL funds that were collected
were supposed to go for that effort.

Q. Well, does the MOU make that clear?

- 7 A. It's volunteer recruitment, training, and 8 retention.
 - Q. That's what it says. It says --
 - A. It's a GAL memo -- I mean, memorandum of understanding. It's not for the Friends of Clayton County CASA's development on fundraising. Nowhere in the MOU does it say anything about fundraising.
 - Q. It says, "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." That's what it says; right?
 - A. Right.
- Q. It does not specifically say solely for the GAL program, does it?
 - A. Doesn't specifically say that, no.
- Q. Okay. All right. So let me show you what's marked as Exhibit 17.
- 24 (Exhibit Number P-17 was presented.)

25 / / /

9

10

11

12

13

14

15

16

17

18

150

1 BY MR. BUCKLEY: 2 Q. Excuse me. This is a letter dated June 3rd, 2013, to Gerald Bostock signed by John P. Johnson III 3 with a c.c. to Judge Steven C. Teske and to Colin Slay. 4 5 This is the letter -- or the termination letter that 6 you were just referring to a minute ago; right? 7 Α. It is. 8 Q. Okay. And it shows a June 3rd date. 9 June 7th memorandum says, "We received the answers on May 31, 2013. At that time, I demanded that 10 Mr. Bostock surrender the FCC debit cards and 11 checkbooks." 12 13 So I just want to be clear. Did you ask him to surrender those when you handed him that letter? 14 15 Α. No. Did Johnson hand him the letter, or did you 16 Q. hand him --17 I believe John handed him the letter. 18 Α. 19 Q. Were you present when the letter was handed 20 to him? I don't remember if I was or not. 21 Α. Okay. Who drafted the letter? 22 Q. 23 Mr. Johnson. Α. 24 He did? Did he have any help from anybody Q. 25 else?

151

1 Not that I'm aware of. I don't know. Α. 2 Q. Okay. But Johnson was not the decision It was Judge Teske, the decision maker, your 3 testimony; right? 4 5 Α. Yes. So then you say that the "card was 6 Q. 7 delivered to the FCC board chair, Sabrina Crawford, 8 when Judge Teske and I met with her on May 31." 9 So it was May 31 that you all told her that Bostock's termination was imminent. Do you know if 10 that June 3rd letter was handed to him on June 3rd, or 11 was it handed to him at an --12 13 Α. I believe it was ---- earlier time? 14 Q. 15 Α. -- handed to him the morning hours of June 16 3rd. 17 Q. Okay. So the decision was made on May 31st. 18 Α. Right. 19 Okay. You don't mention it in this memo, Q. 20 but at that meeting is also when Ms. Crawford was told of the reasons for Gerald's termination; right? 21 22 Α. Right. 23 Okay. All right. So then you say, "Also, Q. 24 on May 31, 2013, Judge Teske and I met with DA Tracy Lawson and Chief Investigator Paul Garland to share our 25

152

1 concerns and the findings of the audit. Mrs. Lawson 2 made the determination to open an investigation by her office." 3 Did Judge Teske ask her to open an 4 5 investigation? He didn't ask her. He presented the audit 6 7 report, there was a discussion about it, and she made 8 the decision. 9 Well, if he didn't want the DA to Q. investigate it, he wouldn't have come to the DA and 10 presented the audit report; right? 11 12 Α. Well, I think he was doing his due 13 diligence. The conversations I had with him is this is part of the process that needs to be handled since 14 we're talking about funds and potentially missing 15 16 money. 17 Q. The next paragraph says, "Mr. Bostock's answers to the questions were determined 18 19 to be insufficient, and on June" -- and you're saying 20 they were determined to be insufficient by whom? Judge Teske? 21 22 Α. Yes. 23 And then, "On June 3rd, 2013, he was served Q.

with a notice of intent to terminate his employment

because of negligence, incompetence, and conduct

24

153

1 unbecoming." 2 You're simply taking the language of the letter and reciting it in this document; right? 3 Α. 4 Right. 5 Q. Okay. Those were the civil service code sections 6 Α. 7 that were --8 Q. Okay. 9 -- cited as cause for termination. Α. Now, you said here, "In the days following, 10 Q. we have continued to uncover evidence of poor record 11 12 keeping practices and other concerning matters, 13 including missing cash, parenthetical, "cash, checks, and receipts for GAL funds received in 2012, as well as 14 checks and cash received for the 2012 Duck Derby 15 fundraising event were found in the credenza in 16 Mr. Bostock's office on June 6, 2013 -- according to 17 the receipts, \$200 cash is missing -- and money was 18 19 inventoried and secured in the juvenile court's safe." 20 Did you find those monies? The monies were found by Carol Gossett. 21 Α. His successor in interest? 22 Q. 23 Correct. Α. 24 And you said there was \$200 in cash missing Q.

according to the -- so there were receipts.

154

1 still have copies of those receipts and of that 2 documentation? Α. I don't know if they are part of the file or 3 4 not. 5 Do you know if they're a part of the Q. 6 file that was turned over to the DA? 7 I think so. 8 Q. You worked -- you provided the DA with 9 information after Gerald was terminated; right? You personally did? 10 Yeah, this memo. 11 Α. 12 Q. Well, this, and then there was some other 13 follow-up --14 Α. There were some --15 Q. -- writings. -- records that he requested that Carol 16 Α. 17 Gossett primarily provided. I had a couple of email exchanges, questions for clarification, that sort of 18 19 thing. 20 Okay. You said, "The money was inventoried 0. and secured in the juvenile court safe and missing 21 property that was purchased with GAL funds, including a 22 23 smartphone and digital camera." 24 I'm not sure I can tell what you're saying

25

there.

155

1 Α. So --2 Q. How did you -- did you find the phone and 3 the camera, or did you not find the phone and the camera? 4 5 We didn't find them. Α. Okay. And you say --6 Q. 7 Not at that time. I think the camera was --8 I don't remember if it was the camera or the phone. 9 One of the items was subsequently located, but one of them wasn't. 10 Did you learn ever that Gerald had sought to 11 12 turn in his phone to the board and they told him to 13 keep it and change the number? I didn't know anything about that. 14 Α. Okay. Did you ever find the camera? 15 Q. I believe the camera was the item that was 16 Α. found. 17 Okay. And are you saying that the purchase 18 Q. 19 of the camera served no purpose as far as Friends of 20 Clayton County CASA were concerned? I'm not saying that. 21 Α. 22 Q. Okay. Because, I mean, I know they had 23 events. 24 Α. Right. And they would sometimes make records of the 25 0.

156

1 events, take pictures --2 Α. Sure. -- and whatnot; right? That's not an 3 Q. illegitimate expenditure. 4 5 No. That's not what I was saying. Α. 6 Q. Okay. 7 I was just saying we couldn't -- we knew 8 there was a camera, and we couldn't locate it at that 9 time. Okay. Did you ever follow up with the DA's 10 Q. office and say, "Well, we found the camera, and we 11 checked and" --12

- A. Yeah.
- 14 Q. I don't see any memoranda to that effect.
- 15 A. It was a phone call.
- 16 Q. Okay.

13

19

20

21

22

23

24

- A. You'd have to -- the DA's office may have records of that or something. I'm not sure.
 - Q. Now, you then say in here, "Subsequent discussions with FCC board members and Child Welfare Services staff also leads me to conclude that Mr." -- leads me, that's you -- "to conclude that Mr. Bostock was intentional in his misuse of GAL funds and that he possibly misled FCCC board members about their responsibility to oversee and approve expenditures."

Video Deposition

157

Okay. Who did you talk about on the FCC board?

- A. Sabrina Crawford was one person.
- Q. Okay. Who else?
- A. I think it was -- I know his name is Angel, and I think his last name was Ramos. He is the father of one of our court employees, Annell -- at the time it was Graniella.
- Q. Okay.

3

4

5

6

7

8

9

10

11

12

13

14

15

19

20

21

22

- A. Those are the two people I remember having a conversation with.
- Q. Was this after -- you mentioned the one conversation you and Judge Teske had with Sabrina on May 31st. Was this another conversation you had with her?
- A. No, it would have been that conversation.

 That's the only conversation I remember having with

 her.
 - Q. And what was it that she said in that conversation that led you to believe that Gerald was intentional in his misuse of GAL funds and that he misled Sabrina Crawford about her responsibility to oversee and approve those expenditures?
- A. Primarily her lack of coming to his defense.

 During the meeting, she didn't offer any explanation as

to how they were, you know, managing or overseeing the expenditures. She didn't say, "Oh, we approved that and that, and that's okay. That's the way we operated."

- Q. If she testified that she did, would you disagree with that?
 - A. I don't recall her doing that.

- Q. Okay. What about Ramos, what did Ramos say that caused you to believe that "Bostock was intentional in his misuse of GAL funds, and that he possibly misled FCCC board members about their responsibility to oversee and approve expenditures"?
- A. He was involved in helping with the construction of the Duck Derby structure, a ramp and there was like a tower that the people stood on to start the Duck Derby. And he alluded to materials that were purchased during that time being used to repair or improve something at Gerald's home.
- Q. You say he alluded to that. First of all, when did you have the conversation with Mr. Ramos that you're referring to?
- A. It would have been very close to when all of this was happening. I don't remember the exact date.
- Q. And what was the thing Mr. Ramos said that building supplies were used for to repair something at

159

1 Gerald's home? What was the thing that was being 2 repaired at Gerald's home? I don't recall what it was. It seems like Α. 3 it had something to do with the back porch or 4 5 something, but I don't --6 Q. Okay. 7 Α. -- remember at this point what exactly it 8 was. 9 Did you document this conversation with Q. Mr. Ramos in any way? 10 No, I did not. 11 Α. 12 Q. Okay. Did you ever go out to Gerald's house 13 to see if he had any recent repairs to his back porch or any other part of his house? 14 I've been to Mr. Bostock's house, but I'd 15 Α. never -- not at that time. 16 17 Q. Okay. Did you ever verify in any way whether or not Mr. Ramos -- what he said was true, or 18 19 was it just a supposition on his part? 20 I don't know. I mean, I didn't take any action to independently verify it. At this point my 21 involvement with this was concluded. 22

saying that he told you this, I mean, that's a serious

accusation, that he was using CASA funds to fix his

23

24

25

Q.

Well, what I'm just -- you know, if you're

160

back porch, for example.

A. Right.

1

2

3

4

5

6

7

8

10

11

12

13

14

15

23

24

- Q. And I'm just wondering. You said he alluded to that. Did he -- was this speculation on his part?

 Did he say, "I saw Gerald take building supplies," or "I went over to Gerald's house and fixed his porch," or what did he say, or do you remember?
- A. I don't remember exactly that conversation.
- 9 Q. Okay.
 - A. Mr. Johnson had a more in-depth conversation with him, and that's how it came up is me mentioning the conversation with Mr. Johnson that he had had. And he -- when I say he alluded, he more or less confirmed that conversation had occurred.
 - Q. He --
- 16 A. Mr. Ramos.
- Q. -- Johnson? Johnson confirmed to you that a conversation happened with Angel --
- A. No, no. Mr. Johnson, I think prior to this,
 had had a conversation with Mr. Ramos. And then when I
 was talking to him, I mentioned it, and Mr. Ramos
 confirmed the conversation with Mr. Johnson.
 - Q. Okay. And as far as Ms. Crawford's concerned, the conversation that you're referencing which caused you to conclude that "Bostock was

161

intentional in misuse of GAL funds and possibly misled 1 2 FCCC board members" was based on her not responding to the accusations that you and Teske leveled against 3 Gerald at your meeting with her on May 31st at her 4 5 dealership. 6 Α. Correct. 7 ο. Okay. It was not based on anything 8 affirmative that she said, such as, "Oh, my gosh, 9 Gerald's been misleading us. I didn't realize that." Those comments came more from the Child 10 Α. No. Welfare staff themselves. 11 All right. Well, let's talk about the Child 12 Q. 13 Welfare staff. Who on the Child Welfare staff did you talk to? 14 Α. Subsequent to all of this? 15 Well, I mean, I'm specifically referencing 16 Q. 17 what you say here, "Subsequent discussions with FCC board members and Child Welfare Services staff leads me 18 19 to conclude." So who on Child Welfare staff did you 20 talk to that caused you to draw this conclusion? 21 Α. Carol Gossett was one person. 22 Q. Okay. Concilia Chilumuna. 23 Α. 24 Q. Spell that.

25

Α.

It's Concilia, C-o-n-c-i-l-i-a. Chilumuna

162

is C-h-i-l-u-m-u-n-a, I believe.

- Q. Okay. Who else? Anybody else?
- A. Those were the two I recall conversations with. There could have been more, but I don't -- there weren't a lot. It was those two primarily.
 - Q. Did you take any notes from any of those conversations?
 - A. I may have. I couldn't find them when we went through the discovery.
- Q. Okay.

1

2

3

4

5

6

7

8

9

10

13

14

15

16

17

18

19

20

21

22

- A. So I don't know what happened to them, if I discarded them.
 - Q. What did Gossett tell you specifically about misuse of GAL funds?
 - A. Both of them alluded to taking certain staff members to lunch multiple times and, you know, seeming to purposefully not include other people. In other words, there were certain people he would take to lunch more often than anybody else. That was primarily the thing, just the way he was spending the money. Also, that many of the people that he claimed were volunteers were actually close friends, stuff like that.
 - Q. Did those close friends volunteer?
- A. I don't -- I don't know for sure if they did or not.

163

- Q. I mean, if they did, it wouldn't be anything wrong with recruiting your friends, would there?
- A. Not necessarily. Might be something wrong with wining and dining them multiple times.
- Q. If he did that. Did they tell you he was wining and dining his close friends multiple times?
- A. That's what they alluded to, that he was going out with his friends to restaurants and bars, that it really had nothing to do with CASA, he's just taking his friends out.
- Q. When you say alluded, are you saying they stated that?
 - A. I can't remember exactly what they said.
- 14 Q. Well, I --

1

2

3

4

5

6

7

8

9

10

- A. See, that's why I'm saying alluded. I don't really recall word for word what was said.
- 17 Q. All right. It's important.
- 18 A. Sure.
- Q. If I accused you of theft point blank, that
 would be a serious allegation. If I said, "Well, I
 don't trust" -- "I wouldn't leave my wallet in the same
 room with Colin Slay" --
- 23 A. Right.
- Q. -- I might be alluding to my suspicion that you're a thief, but I haven't accused you of being a

164

1 thief. That's why I'm asking you --2 Α. Right. -- this way. So when you say they alluded, 3 Q. it sounds like they broadly and generally said, "Well, 4 5 we didn't think he should be spending money on lunches this way, and he took some people to lunch more than he 6 7 took others." 8 Α. Right. 9 Do you know, for example, did they say --Q. when you say staff members, you mean staff members of 10 Friends of --11 12 Α. No. 13 Q. -- CASA? The court employees. 14 Α. Court employees. Do you know whether any of 15 Q. the staff members that he took to lunch were also 16 17 involved in recruiting or training members of Friends of Clayton County -- excuse me. Strike that. 18 19 know if any of the staff members he took to lunch were 20 involved in recruiting or training or sustaining volunteers for the Guardian Ad Litem program? 21 All of them were involved in that process. 22 Α. 23 That was their job. They were supervisors of the 24 volunteers, which innately, you know, includes keeping the volunteer engaged with the program. 25

165

Q. So taking some -- taking somebody who's involved in training to lunch could be a legitimate activity for these funds; correct?

A. Sure.

1

2

3

4

7

8

9

16

17

18

19

- Q. Okay. And they said maybe he was being -- showing favorites or something doing that.
 - A. But what they were referring to wasn't taking volunteers to lunch. It was taking the staff to lunch.
- 10 Q. Well, no, no, I get it. I get it.
- 11 A. Okay.
- Q. But the staff members were -- some of them,

 at least, were involved in either recruitment or

 training or retention of GALs; correct?
- 15 A. Yes.
 - Q. Right. Okay. So -- follow me here. So taking them to lunch, for example, to discuss training or to keep them happy or whatever the case may be, could be a legitimate expenditure of those funds.
 - A. I wouldn't agree with that.
- 21 Q. Because --
- A. You're taking a county employee to lunch to talk about them doing their job, and you're using county funds to do that. That's not allowed under --
- 25 Q. Wait.

166

A. -- the court.

1

2

3

4

5

6

7

- Q. That's not county funds.
- A. They are -- they are court generated funds.
 - Q. These are not county funds. They are funds that belong to a nonprofit; correct? If they were ever county funds, then they would have been written on a check to the county.
- A. Which now happens because that MOU was not done properly.
- 10 Q. You're right. Now it happens.
- 11 A. It happens now because when Mr. Bostock 12 drafted the MOU, he set it up the way that it was.
- Q. How do you know --
- 14 A. That was done in error.
- 15 Q. How do you know Mr. Bostock drafted --
- A. I was told by Mr. -- by Judge Teske that he was involved, he's the one that drafted the original MOU.
- 19 Q. How does Teske know? He wasn't even a 20 signatory to it.
- 21 A. He was a judge at the time.
- Q. He was not signatory to this.
- A. But he was a judge at the time. I take his word. He's an honorable man. He's a judge.
 - Q. Well, I'll submit to you that Mr. Bostock is

167

an honorable man too, sir.

A. I'm not questioning that at this point.

3 MR. HILL: Just wait for him to ask a

4 question.

1

2

5

9

14

15

17

BY MR. BUCKLEY:

Q. All right. So regardless of the

7 draftsperson of the MOU, the MOU said what it said, and

8 it was signed -- if people didn't like the way it was

drafted, they could have said, "Well, I'm not signing

10 this." But the chief judge of the superior court

11 signed it, and the chief judge of the juvenile court at

12 the time also signed the document, as did Mr. Bostock.

13 He didn't force it on them, as far as you know. They

signed it. They consented to its terms. True?

A. As far as I know.

16 MR. HILL: Object to the form of the

question.

18 BY MR. BUCKLEY:

19 Q. All right. So nobody's going to accuse

20 Mr. Bostock of being a lawyer. Okay? We can accuse a

21 few other people in this room of that, but we can't

22 accuse him of that. And nobody's going to say, "Gee,

23 whiz, he should have been more lawyerly in drafting

24 this document," because he's not a lawyer. But,

25 subsequently, other MOUs were drafted once the audit

168

1 was performed and there was a recognition that the 2 original MOU was not specific enough in discussions of how money should be expended and duties and things like 3 that; right? 4 5 Correct. Α. All right. Now, I want to show you some 6 Q. 7 exhibits. This is Plaintiff's 36. It was just -- I've 8 got three -- can y'all share that? 9 MR. HILL: We've got them. MR. BUCKLEY: Okay. All right. Thank you. 10 MR. HILL: We have them. 11 12 (Exhibit Number P-36 was presented.) 13 BY MR. BUCKLEY: So this is Plaintiff's 36. This document is 14 dated August 9th, 2013. This is just basically two 15 months after Gerald was terminated; right? 16 17 Α. Correct. And do you know who drafted this particular 18 0. 19 document? 20 I don't know for sure. Α. Okay. And this document was drafted as part 21 Q. of an effort to remediate some of the perceived 22 defects -- some defects that the audit perceived in 23 24 Plaintiff's Exhibit Number 3, the original MOU; right? 25 Α. Yes.

169

Q. Okay. And an honest reading of that audit report, which you have in front of you, is very, very critical of the lack of guidelines in the MOU; correct?

- A. In the MOU, yes.
- Q. Right. Okay.
- A. As well as the lack of procedures and policies for the Friends.
 - Q. Right. We can probably argue the rest of the deposition about whether those procedures and policies should have been in the MOU --
- 11 A. Sure.

1

2

3

4

5

6

7

8

9

- 12 Q. -- or in the bylaws of Friends --
- 13 A. Right.
- Q. -- of Clayton County CASA. But the audit
 was critical of the lack of procedures and guidelines
 regardless -- in the handling of Friends of Clayton
 County CASA funds; right?
- 18 A. Correct.
- Q. And so this MOU, which was drafted and submitted just a couple of months after Gerald was fired, was meant to remedy some of those defects; right?
- 23 A. Right.
- Q. And let's look at Section 2 for a minute.

 Administrative fee, that's on page 2 of this document.

170

1 MR. BUCKLEY: We're going to need to get 2 Bates numbers ultimately on these, by the way. MR. BUECHNER: We will. 3 MR. BUCKLEY: Okay. All right. 4 5 BY MR. BUCKLEY: 6 So, again, it recites that CASA will charge 7 a flat \$500 administrative fee. It's basically -- the 8 first paragraph is the same as the first paragraph in 9 Plaintiff's Exhibit 3; right? 10 Α. Yes. Then the second paragraph says, "Order for 11 Q. 12 payment of costs of guardian ad litem services will be 13 sent to the respective parties by the Clayton County Superior Court and shall include the following 14 statement: Cash and money order are acceptable means 15 of payment. No personal checks will be accepted. 16 17 However, a check drawn on the respective attorney's firm will be accepted for payment." 18 19 Very similar to Exhibit 3; right? 20 Correct. Α. Then it goes on and says, "All fees shall be 21 Q. paid to the clerk of the Juvenile Court of Clayton 22 23 County, Georgia, to be separately accounted for and 24 designated as GAL Superior Court Program and to be

distributed for the support of the CASA volunteer

171

program, including recruitment, training, and retention 1 2 of CASA volunteers and to support CASA volunteer activities in furtherance of CASA objectives." 3 So the payee is really who gets changed in 4 5 this; right? 6 That's right. Α. 7 ο. And the payee, which was Friends of Clayton 8 County CASA, becomes the Juvenile Court of Clayton 9 County; right? That's right. 10 Α. Okay. And then once it is paid into the 11 Q. 12 Juvenile Court of Clayton County, do you know if those 13 funds were then paid over to Friends of Clayton County CASA? 14 15 Α. No. They were not? 16 Q. 17 Α. They remain in the juvenile court. So one of the -- one of the side benefits to 18 0. the juvenile court of this whole event was that funds 19 20 that were going to an outside nonprofit now were going into the coffers of the juvenile court; correct? 21 MR. HILL: Object to form. 22 23 BY MR. BUCKLEY: 24 Q. Go ahead. They go into the coffers of the juvenile

25

Α.

court to be used for the purposes in the --

Q. Okay.

- A. -- MOU, yes.
- Q. So two months after Gerald was fired, the payment plan is changed and funds are going into the juvenile court. Then there is another recitation of the roles and responsibilities of the CASA volunteers. Did that change dramatically, or was it pretty much the same?
- A. I believe it's very -- if it changed at all, it may have been a correction, but it's essentially the same.
- Q. Okay. All right. If the \$500 was going to the juvenile court, to the clerk of juvenile court instead of to Friends of Clayton County CASA, who oversaw the use of those funds?
- A. So Concilia Chilumuna, who is now the -fills the role that Gerald was in, Child Welfare
 Services coordinator, she will come to the chief of
 staff, the current chief of staff, when she has an
 expenditure that she wants to make.
 - Q. Okay.
- A. Chief of staff reviews that and approves that. Then the clerk issues the check.
 - Q. Any expenditure whatsoever?

173 sition

- A. As long as it's related to recruitment, retention, and training of volunteers --
 - Q. Okay. What if she --
 - A. -- of CASA.
 - Q. And I'm just going to give you a couple of hypotheticals here. What if she wanted to take her staff, who's involved in the recruitment and retention and training, what if she wanted to take her staff to lunch? Would she need to get approval in advance?
 - A. That wouldn't be approved.
- 11 Q. It would not be approved.
- 12 A. No.

3

4

5

6

7

8

9

10

20

21

22

23

24

- Q. Because --
- A. It's benefiting court employees. It's not directly related to recruiting or retaining or training volunteers.
- Q. Okay. But in terms of the nonprofit, in the previous MOU there was nothing that prevented that from occurring from the perspective of the nonprofit.
 - A. Not from -- apparently.
 - Q. Okay. And that was one of the things -- let me be clear on this. Was that one of the things that the auditors took issue with, that funds were being spent, for example, on lunches for court staff? Did they say anything about that?

- A. I don't remember if they specifically cited that as an example.
- Q. Okay. All right. So she couldn't take court staff to lunch. How, if at all, could she use those funds for -- because the court staff are the people who are going to train these guardian ad litems. How, if at all, could she use those funds to train court staff?
- A. So CASA -- well, prior to the pandemic, they would do an annual training event, like a conference.

 And those funds could be used to send an employee to that conference.
 - Q. Okay.

- A. You know, we might reimburse something like mileage to go to an in-service that's done by Metro Atlanta CASA or another CASA program if we have say a new employee and we need to get them trained.
- Q. Are there any events that are periodically thrown for volunteers, either for recruiting or rewarding them for their service, recognition ceremonies, anything of that nature?
- A. Yeah. At the end of a class, a CASA volunteer training class when they complete the training, typically -- and this happened more pre-pandemic, of course.

175

1 Q. Right. 2 Α. We would hold sort of a cake-and-punch type reception, invite family and friends. 3 4 Q. Okay. 5 That's when the volunteers would be sworn Α. 6 in --7 Q. No alcohol though. 8 Α. -- by the judge. No. It's held in the 9 juvenile court building, so no. No alcohol is involved. 10 Right. It's no alcohol service because it's 11 Q. 12 in a government building, or it's no alcohol service 13 because that is viewed as an inappropriate use of funds? 14 15 It would be both, but the county does not allow alcohol on the premises. 16 17 Q. Okay. All right. So let me show you what's marked as Exhibit 37. 18 19 (Exhibit Number P-37 was presented.) 20 BY MR. BUCKLEY: This is another MOU, again, between the 21 Q. Superior Court of the State of Georgia for the County 22 23 of Clayton and the Clayton County Juvenile Court. And

I just want to note too, going back to the previous

Exhibit 36, in Plaintiff's Exhibit 3, the original MOU,

24

176

1 Clayton County CASA was a party to the agreement; 2 right? This is the original. Yeah, that's the 3 Α. original. Yes, it was. 4 5 They are no longer going forward -- in any Q. 6 of these MOUs, they are no longer parties to these MOUs 7 concerning expenditure of the \$500 fee paid into the 8 court? 9 Friends of CASA or CASA -- Clayton County Α. CASA program? 10 Clayton County CASA. 11 Q. 12 Α. Not directly. I mean --13 Q. Okay. -- the MOU is with the juvenile court under 14 Α. which Clayton County CASA, of course, falls. 15 Okay. Well, is Clayton County CASA sort of 16 Q. 17 a subsidiary of the -- are they a separate corporation? 18 Α. No. 19 Q. What are they? 20 It's a unit within the --Α. 21 Q. Okay. -- juvenile court, Child Welfare Services. 22 Α. 23 All right. Why are they no longer a party Q. 24 to the MOU? That's the way that Judge Teske wanted it. 25 Α.

1 It was directly with the court. There was no real 2 reason to have them as part of it since they fall 3 within the auspices of the court anyway.

- Q. Did Judge Teske draft Plaintiff's Exhibit 5 36?
- 6 A. I don't know who drafted 36 or 37.
- 7 Q. But he had input into it; right?
- 8 A. Yeah, he certainly approved whatever was --
- 9 Q. You said, in so many words, that's the way 10 Judge Teske wanted it.
- 11 A. Well, right. And these were done because 12 the judges changed.
- 13 Q. Okay.

16

17

18

19

20

21

22

23

24

25

- A. It's just more or less a renewal of the -with the new judges.
 - Q. All right. So this new one that is -- was signed on March 20th, 2018, I guess it was actually filed in Clayton County March 21st, 2018. You say this was just prepared and signed because the judges changed?
 - A. Yes. I don't -- I can't say with certainty something -- you know, some word or something wasn't changed. There was nothing substantial with the way that the program operates that was changed with any of these subsequent -- the Exhibit 36 or 37.

178

1 Q. Okay. 2 Α. It was primarily because we had a new set of judges and new chief judge in superior court. 3 Q. Okay. And so for going back to 36, this is 4 5 the first MOU that was signed by Judge Steven Teske; 6 correct? 7 Α. I believe. Yes, that's right. Okay. Now, Simmons, Matthew O. Simmons, it 8 Q. 9 says Matthew O. Simmons is the judge. He was the chief judge previously; right? 10 That's right. 11 Α. 12 Q. When Exhibit 3 was signed. 13 Α. Right. 14 Okay. So he had stepped down from being the Q. 15 chief? 16 They have a system where they rotate every Α. 17 so many years. I'm not exactly sure what it is, but --Is Judge Teske still a chief judge? 18 Q. He will be until the end of this month. 19 Α. 20 Right. Okay. Will a new MOU be signed? Q. It will. We'll have a new chief judge 21 Α. 22 and --23 Okay. Q. 24 Α. -- we'll go through that --25 All right. Now --0.

179

A. -- process again.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

- Q. -- I also note that the people who are signing Exhibit 36, you've got the chief judge of the superior court, a judge of the superior court, another judge of the superior court, one, two, three, four judges of the superior court, and then the chief judge of the juvenile court. Was every judge of the juvenile court required to sign this document?
 - A. No, just Chief Judge Teske.
- Q. Why, if you know, why -- if this is a directive that fees be paid to the clerk of the Juvenile Court of Clayton County, to be separately accounted for and designated as GAL Superior Court program, why was it necessary for the other superior court judges who aren't really involved with these funds to sign off on this document?
 - A. I don't know.
- Q. So 37 is simply an update for the purpose of the changing of personnel at the judge level?
 - A. Yes, sir, I believe so.
- Q. Okay. And 38, is that -- Exhibit 38, let me hand you that.
- 23 (Exhibit Number P-38 was presented.)
- 24 BY MR. BUCKLEY:
- 25 Q. This is an MOU dated February 20 -- I'm

Colin Slay - September 10, 2021

180 **Video Deposition** 1 sorry, February -- well, signed in February of 2017, 2 which was entered filed in Clayton County Superior Court on February 22nd, 2017. 3 MR. HILL: Wait. Which one are you looking 4 5 at? I'm sorry. MR. BUCKLEY: Wait a minute. 6 7 THE WITNESS: 38. 8 BY MR. BUCKLEY: 9 Maybe I got my exhibits confused. One Q. Okay. 37 was March 21st. 38, I guess, is 10 second. actually prior to that, February 2017. 11 12 Α. Right. 13 Q. Okay. So this was another instance of sort of the changing of the guard? 14 That's what it was, yes, sir. 15 Α. 16 Q. Okay. 17 Α. Judge Collier was the chief judge at that 18 time. 19 I see. Okay. In your memorandum, you list Q. 20 a number of people that you say, "I believe the following persons have information relevant to this 21 investigation." And you list Judge Teske, Johnson, 22 23 Carol Gossett. Who is Becky Galbreath?

at that time, I believe. So she was the person

She was a CASA volunteer training supervisor

24

25

Α.

Г		
1	responsible	e for training the CASA volunteers.
2	Q.	Was she a juvenile court employee?
3	A.	She was.
4	Q.	Is she still employed by the juvenile court?
5	A.	No.
6	Q.	You list Kimberly Walker?
7	A.	Yes, sir.
8	Q.	Was she also a CASA volunteer or trainer?
9	A.	She wasn't a trainer. She was a supervisor.
10	Q.	Of the CASA volunteers?
11	A.	Of just volunteers, right.
12	Q.	Is she still employed by the juvenile court?
13	A.	She is not.
14	Q.	Were either Galbreath or Walker, did they
15	leave volu	ntarily or involuntarily?
16	A.	Both voluntarily.
17	Q.	Okay. You mention Requeral Stoutamire,
18	Mr. Bostocl	κ's program assistant. Is Stoutamire still
19	employed?	
20	A.	No, sir.
21	Q.	Did Stoutamire leave voluntarily or
22	involuntar	ily?
23	A.	I believe she actually, if I remember
24	correctly,	resigned in lieu of termination.
25	Q.	Okay. Do you know what the reason was?

182

1 Α. Just repeated problems with performance, 2 kind of a multiple --3 Q. Okay. Α. -- issue. 4 5 You list Shelley Johnson, Clayton County Q. Juvenile Court. Who is she? 6 7 She was a CASA volunteer supervisor, and I believe she did some of the GAL cases, the superior 8 9 court GAL cases. When you say she did, did she serve as a 10 Q. guardian ad litem? 11 I think she did in that role as well as, you 12 13 know, managed some of the volunteers that served in that role as well for a while. 14 15 Is she still employed by the juvenile court? Q. No. She retired. 16 Α. Annell Graniella, who is she? 17 Q. She was a CASA volunteer supervisor. 18 19 now -- goes by Annell Hudson, and she is the current 20 Citizen Review Panel coordinator. So she's still employed by the court? 21 Q. 22 Α. Yes, sir. Tell me what the Citizen Review Panel 23 Q.

So when kids are placed into foster care,

24

25

coordinator does.

Α.

183

1 their cases are periodically supposed to come back to 2 the judge for a review hearing. And this program was created by the Council of Juvenile Court Judges some 3 years ago. And basically we have volunteers that are 4 5 screened and trained, and they review the cases with the child and the DFACS workers and then made a report 6 7 to the judge in lieu of the actual hearing. It was --8 Q. Okay. What about Kimberly Walker? 9 I think that was a -- I put her down twice, Α. it looks like. It's the same --10 You did. 11 Q. 12 Α. -- person as number 5. 13 Q. Okay. Sorry. Okay. And then Hawa Minor? Am I reading that right? 14 That's right. 15 Α. Who is she? 16 Q. 17 Α. She was a CASA volunteer supervisor as well, and she's since retired. 18 Concilia Chilumuna? 19 Q. 20 Correct, yeah. Α. Who is she? 21 Q. She at the time was the Citizen Review Panel 22 Α. 23 coordinator at that time, and she now sits in the role 24 that Gerald was in, the Child Welfare Services coordinator. 25

184

- So Ms. Gossett is no longer in that role? Q.
- Α. She retired a few years ago.

1

2

3

5

6

7

8

9

10

11

16

17

21

- Sabrina Crawford, we know who she is. Q. Okay. Stan Owen was an FCCC board member. Is that somebody 4 that you spoke with?
 - I don't remember speaking to Stan at all about any of this. But he had pre -- prior to him going to the sheriff's office as the chaplain, he had been a CASA volunteer supervisor with us. And then after that he -- when he went to the sheriff's office, he started serving on the board.
- He was a board member at or about the time 12 Q. 13 that Gerald was terminated?
- That part I don't -- I don't remember if it 14 Α. was -- if that aligned or if it was before. 15
 - Debbie Stinson, she was an FCCC board Q. Did you talk to her?
- She was actually the assistant clerk 18 Α. 19 of court at the time as well, so she was employed with 20 the court.
 - And did you talk to her about --Q.
 - I don't recall talking --Α.
- 23 -- Gerald? Q.
- 24 -- to her as far as the investigation is Α. I mean, I'm sure there was a conversation 25 concerned.

185

1 afterward. 2 Q. Okay. Ginger Bedell? Α. Yes, she formerly worked for the Clayton 3 County tax assessor office, but she was --4 5 A board member? Q. Yeah. And I know she worked with the ABC 6 Α. 7 organization as well. Q. 8 And then Shawn Black, you said former 9 employee. That's the guy who wrote the memorandum? 10 Α. Correct. Okay. So let's go back for a minute. We've 11 Q. 12 talked about some of these people, and I don't think we 13 need to belabor their knowledge, but you listed these folks. Did you list them because you -- some of them 14 you talked to, obviously Teske, Johnson, maybe Gossett. 15 You have relayed the conversations with Sabrina -- the 16 17 conversation with Sabrina Crawford. Black, we're talking about the memorandum, but you never talked to 18 him, I think you said. 19 20 I didn't. Α. 21 Q. Okay. I don't recall talking to him after. 22 Α. 23 So I'm going to ask you this question with Q. 24 respect to any of the facts leading to Gerald's

Okay? Did you personally talk to Becky

25

termination.

Colin Slay - September 10, 2021

186 **Video Deposition** 1 Galbreath? 2 Α. No. Did you personally talk to Kimberly Walker? 3 Q. Α. No. 4 5 Did you personally talk to Requeral Q. Stoutamire? 6 7 Α. No, sir. 8 Q. Did you personally talk to Shelley Johnson? 9 No, sir. Α. Did you personally talk to Annell Graniella? 10 Q. There may have been a conversation with her. 11 Α. I don't -- I wouldn't say I didn't, but I don't really 12 13 recall any major detail of it. You don't remember any specifics? 14 Q. 15 Α. No, sir. 16 Okay. Kimberly Walker? Q. 17 Α. Same one, no. You did talk to her or you --18 Q. 19 Α. No, I did not. 20 Okay. Hawa Minor? Q. 21 Α. No, sir. Concilia Chilumuna? 22 Q. I did, specifically when she brought me 23 Α. 24 money that Gerald had told her about I think on the day

that he met with John and I for the termination

meeting. There was some money that was in his office,
and he told her about it, so --

- Q. When he told her to turn over the money or what?
- 5 A. Yeah, to get it.
- Q. Okay. He wasn't trying to hide the money or make off with it. He was --
- 8 A. No.

3

4

- 9 Q. -- giving it to the proper person to give it 10 to.
- 11 A. Right.
- Q. Okay. So she just brought -- did she bring the money to you?
- A. Well, he told her -- according to what she told me --
- 16 Q. Yeah.
- A. -- he told her she needed to do something
 with it. And then she brought it to me like, "I don't
 know what to do with this."
- Q. When he said she needed to do something with it, was it that vague, or did he tell her you need to give this money to so and so or deposit it here or what?
- A. The context is this money was money that was collected before. And when I say before, it was when

188

we were in the other courthouse before we moved into the new courthouse.

- Q. Right.
- A. Gerald's unit and Concilia's unit would jointly sell Chick-fil-A biscuits on Friday mornings to raise funds.
- 7 Q. Okay.

1

2

3

4

5

6

8

9

10

11

12

- A. And I think the intention was that that money was going to be split between those two units. So back to when he brought her the money, I think he was saying, "Hey, we never split this. You need to do something with it."
- Q. So he wasn't telling her to do anything improper with it.
 - A. No, I don't think that was --
- 16 Q. Okay.
- 17 A. -- the intention.
- Q. And if I understand the directive in the original MOU, often this \$500 payment, maybe not all the time, but frequently it was made in cash; right?
- A. I don't know how often it was -- I know
 there was some cash that was involved, but I don't know
 how often.
- Q. Well, I think the MOU does say it can be made in cash.

- A. Yeah, I think -- yeah, that's right.
- Q. And so it would not be, if Gerald's suddenly terminated, it would not be unusual or surprising that there could be cash in his office that had been paid to be deposited with Friends of Clayton County CASA; right?
- A. It wouldn't surprise me to find money there, you know, that had been recently received, yeah.
- Q. All right. Okay. So the extent of what Concilia knows is that Gerald told her or showed her or gave her some cash. Was this at the time he was terminated he said, "I'm being terminated, you need to take care of this"?
 - A. I believe it was the day of the meeting.
- 15 Q. Okay.

- A. I mean, I don't want to be held to that because I'm not a hundred percent sure, but it was sometime very close to that date.
- Q. It's your understanding or recollection that at or about the time that Gerald was directing her or asking her to handle the proper distribution of that cash because he was being taken out of his position?
- A. I mean, I would assume. I don't know for sure.
 - Q. Okay. Did he get put on a leave of absence

190

first? 1 2 Α. Yes. So he may have done it when he was put on 3 Q. leave of absence. He may have said, "Hey, you need to 4 5 handle this." Right? That could have been. 6 Α. 7 Q. Okay. 8 Α. I don't know for sure. 9 You're not -- I mean, by her bringing the Q. money to you, you're not suggesting that there's any 10 inference of wrongdoing on Gerald's part for asking her 11 to handle that. 12 13 Α. No, I'm not suggesting that. All right. So did you ever talk to Stan 14 Q. 15 Owen about Gerald's -- the events leading to Gerald's termination? 16 17 Α. No, sir. Did you ever talk to Debbie Stinson about 18 0. the events leading to Gerald's termination? 19 20 I believe after the fact because we worked Α. with the clerk's office to set up the -- you know, the 21 receipt of the money and --22 23 Q. Okay. 24 Α. -- all of that. So, to be clear, you know, you mention she's 25 0.

191

1 an FCCC board member here. 2 Α. Well, I believe she was -- she may have been on the board of the -- I know she was heavily involved 3 with the Ambassadors --4 5 Q. Okay. -- program. But so that may be a mistype or 6 Α. 7 a mislabel. 8 Q. Okay. 9 I don't know for sure, though, if she was Α. ever on the actual board of the Friends. 10 So it sounds to me, with respect to Ginger 11 Q. 12 Bedell, that you talked to her only about setting up 13 the new payment program and not specifically about any alleged wrongdoing on Gerald's part. 14 15 That would have been Debbie Stinson. Α. 16 Q. Sorry. Excuse me. Yeah. 17 Α. Ms. Stinson. 18 0. 19 Α. Yeah, I believe that's the case. 20 may have been some conversation about what happened, you know, that occurred sort of --21 22 Q. Okay. But I don't remember it. 23 Α.

Regency-Brentano, Inc.

make sure if she's a witness with material knowledge --

But she -- in other words, I just want to

24

25

Q.

192

1 Right, right. Α. 2 Q. -- of alleged wrongdoing. You don't know of 3 any. I don't think that's the case. I mean, I 4 Α. 5 don't know that, but --6 Right. Q. -- I mean, she never stood out as a person 7 8 that should be interviewed or anything like that. 9 She never told you --Q. 10 Α. No, no, no. -- "I know about some wrongdoing"? 11 Q. 12 Α. No, nothing like that. 13 Q. Okay. Shawn -- okay. So we -- and Ginger Bedell, she's a board member. Did you talk to her? 14 15 I didn't talk to her. Most of these Α. people -- this list was compiled because those -- I was 16 17 instructed to provide him with a list of people I thought might have knowledge. 18 19 Q. Okay. 20 And so because all of these folks I knew were affiliated either with the CASA program or the 21 22 board. 23 Okay. So these are not people that you --Q. 24 Α. They're not people I talked to --25 -- that you talked to or that you even --0.

193

1 -- necessarily. Α. 2 Q. -- knew had specific knowledge of any alleged wrongdoing --3 Α. Right. 4 5 -- on Gerald's part. Q. 6 Α. Right. 7 Q. Okay. 8 Α. I would say that. 9 All right. So then you say in the final Q. paragraph of your memorandum, "It should be noted that 10 in the midst of the investigation, Judge Teske directed 11 12 that all GAL funds be paid to the clerk of the juvenile 13 court for proper accounting and to be held in trust until proper oversight and control mechanisms could be 14 put in place by the juvenile court and Clayton County 15 Finance." 16 17 Did he enter an order to that effect? What did he do there? 18 19 Α. No, that -- are you referring to the -- like 20 the mechanisms of control, the --All I'm saying is was it documented 21 Q. Yeah. in any way Judge Teske's direction that GAL funds 22 23 should be paid to the clerk of the court instead of to 24 Friends of Clayton County CASA?

25

Α.

Well, that was -- it would subsequently be

194

done in the revised MOU. 1 2 Q. Okay. And I get that. Α. But up until this point, it was just a 3 verbal directive. 4 5 Just a verbal. Okay. Q. Until we -- we had to set up accounts, 6 Α. 7 and --8 Okay. Q. 9 -- that required collaboration with the Α. finance department and all that. 10 11 Q. Okay. So it took some time. 12 Α. 13 Q. All right. I'm going to show you a few other exhibits that I believe pertain to the DA's 14 15 investigation. 16 (Exhibit Number P-21 was presented.) BY MR. BUCKLEY: 17 This is Exhibit 21. This is a memorandum 18 0. dated June 12th, 2013. It's actually addressed to 19 20 Carol Gossett who had assumed Gerald's responsibilities; right? 21 Correct. 22 Α. 23 But you're copying John Johnson, director of Q. 24 Juvenile Court Services, and it's from you; right? 25 Α. That's right.

Ο.	And tha	t's vour	initialing	there .	riaht?

A. That's right.

- Q. Okay. And you say that you received a request from Deputy Chief Investigator Allen Crenshaw and asking staff to begin collecting, labeling, and boxing certain original documents. You say financial records, account numbers, bank statements, draft books, receipts of expenses, debit card numbers, and all FCC bank accounts for Friends of Clayton County CASA, Friends of Clayton County CASA d/b/a Guardian Ad Litem, and Ambassadors Behind CASA.
- The three entities that you list there, as of the time that they had those names, were separate entities from the court; correct?
- A. Those were actually bank accounts held by the Friends of Clayton County CASA.
 - Q. Okay. So you're directing -- who are you directing? You're directing Ms. Gossett to get these bank records; right?
 - A. That's right.
- Q. Did Ms. Gossett, the Child Welfare
 coordinator, have the power to do that with respect to
 Friends of Clayton County CASA?
- A. The Friends of Clayton County CASA's paperwork was housed at our court.

1	Q. Right. And speaking of which, you know, the	
2	whole business of whether or not bank records were	
3	maintained, did you ever determine that Gerald actually	
4	kept each month of bank and financial records for	
5	Friends of Clayton County CASA in his office at the	
6	court? Did you ever determine that one way or the	
7	other?	
8	A. I never I don't know that that was ever a	
9	question that I looked into.	
10	Q. Okay. Do you know whether during the audit	
11	he made all records available to the auditors that were	
12	kept in his office?	
13	A. I'm not sure if he did or not. It seems	
14	that I remember their saying they were missing records.	
15	Q. Okay. Did you ever determine like on a	
16	monthly basis or a weekly basis or anything any you	
17	say it seems they said they were missing records.	
18	A. I think that's what the auditors mentioned	
19	in the report.	
20	Q. Okay. Did you ever determine what months	
21	or, you know, what time frames were missing or	
22	anything	
23	A. I didn't.	
24	Q of that nature?	
25	A. I didn't look into that.	

197

1 All right. You're asking for Q. Okay. 2 incorporation documents, bylaws, any governing policies of FCCC, dates of board meetings of FCCC, and all 3 minutes or records relating to meetings, listing and 4 5 contact information for all past and present FCC board 6 -- FCCC board members and officers, information 7 pertaining to the Hotlanta Softball League sponsorship, 8 name of team, amount of sponsorship, et cetera, listing 9 and contact information for all CASA staff. Was there any particular reason why you --10 you know, you sort of broadly alleged that he was 11 12 taking people to lunch that he shouldn't and having 13 events that maybe he shouldn't have had. Is there any specific reason why you singled out the information 14 pertaining to sponsorship of the Hotlanta Softball 15 League team? 16 17 Α. I didn't single -- this was all requested by Investigator Crenshaw. All I was doing was passing 18 19 along what he had asked for to Ms. Gossett. 20 But had y'all specifically told Crenshaw about this issue concerning the Hotlanta Softball 21 22 League? 23 It was in the audit report. Α. 24 Okay. All right. Let me show you what's Q. marked as Exhibit 22. 25

198

1 (Exhibit Number P-22 was presented.) 2 BY MR. BUCKLEY: I need to be clear on who this is from, 3 Q. among other things. It says -- it's a document Bates 4 5 stamped Clayton 904 dash -- 904-905. And it does not 6 appear to be a dated document, but it says, "On 7 December 6, 2013, I sent an email to Colin Slay 8 requesting the following," and it has a list of 9 information. Do you know who wrote this? Looks like it was -- it says prepared by 10 Α. 11 Allen Crenshaw, Deputy Chief Investigator, so I assume 12 him. 13 Q. Okay. Oh, I see. Okay. Did you ever see this or was this sent to you or --14 I've never seen this. 15 Α. Okay. He says that he sent a request for a 16 Q. 17 number of things, list of names and application forms of volunteers with CASA, Ambassadors Behind CASA, Duck 18 19 Derby, Friends of Clayton County CASA, et cetera. Do 20 you recall receiving that request from him? I know that he -- after this -- on 21 Α. Exhibit 21, that memo was crafted, we delivered to the 22 DA's office a lot of that stuff. And I do recall 23 24 receiving a request for some of the same stuff we'd already delivered. 25

1	Q.	Okay. Did Bostock have a county-issued	
2	vehicle?		
3	A.	A county there was a vehicle available	
4	for his us	e. It wasn't specifically issued to him.	
5	Q.	So it's not a take-home vehicle.	
6	A.	No, no.	
7	Q.	Something that was at the workplace that if	
8	he needed		
9	A.	Yeah.	
10	Q.	to do something he could.	
11	A.	Like a fleet vehicle.	
12	Q.	Okay.	
13	A.	For use for that unit.	
14	Q.	All right. Let me show you what's marked as	
15	Exhibit 23	•	
16		(Exhibit Number P-23 was presented.)	
17	BY MR. BUC	KLEY:	
18	Q.	Did you author this memorandum?	
19	A.	I didn't. This is not from me.	
20	Q.	Have you ever seen it before?	
21	A.	No, sir.	
22		(An off-the-record discussion was held.)	
23	BY MR. BUCKLEY:		
24	Q.	So you've never seen this before. It does	
25	mention yo	ou on the second bottom of the second page.	

200

1 It looks like it's from you, but it's not? This is -- this is not any -- this 2 Α. looks like it's from the district attorney's office. 3 Q. And it talks about -- it has attached 4 Okay. 5 some stuff that's come off of a criminal history 6 Do you know anything about any of that? record. 7 Α. No, sir. 8 Q. None of that pertains to or was a reason for 9 Mr. Bostock's termination? This was all -- all the dates on this 10 Α. No. are after that had occurred. 11 12 Q. After the fact, right. Okay. A few more of 13 these exhibits. This is Exhibit 24. (Exhibit Number P-24 was presented.) 14 BY MR. BUCKLEY: 15 It appears to be a short memorandum from the 16 Q. 17 Office of the District Attorney. It says that, "I received an email from Colin Slay regarding the 2013 18 Duck Derby intakes binder. He advised there was not a 19 20 2013 Duck Derby, so there's no binder." Has there ever been a Duck Derby since then? 21 22 Α. No. 23 Since Gerald was terminated, I mean? Q. 24 Α. No, sir. 25 The Duck Derby was one of the primary 0.

201

1 fundraisers for Friends of Clayton County CASA; right? 2 Α. It was. Does that organization still exist? 3 Q. Α. Yes. 4 5 Okay. How do they raise funds? Because Q. 6 they don't get the benefit of the funds paid into the 7 court, what do they do to raise money? 8 Α. Well, they still accept like personal 9 donations, and they are the recipient of Chairman Turner -- Jeff Turner, Chairman of the Clayton County 10 Commission, he does a 5K. We just had it two or three 11 The proceeds 12 weeks ago, and that's an annual event. 13 from that 5K go to support CASA. 14 Q. Okay. 15 Α. Friends of CASA. 16 Is that their big fundraiser as --Q. 17 Α. It is. -- opposed to the Duck Derby? 18 Q. And Chairman Turner also does sort of a --19 Α. 20 it's in the -- during the holiday season sort of a toy drive, and people donate money to the program. 21 typically done like in -- right before Thanksgiving. 22 23 Q. Is he on the -- now on the Friends of 24 Clayton County CASA board?

Chairman Turner?

25

Α.

Colin Slay - September 10, 2021

202 Video Deposition 1 Q. Yes. 2 Α. No. 3 Okay. Q. He's just always been a strident supporter 4 Α. 5 of the CASA program. Okay. Let me show you what's marked as 6 Q. 7 Exhibit 25. 8 (Exhibit Number P-25 was presented.) 9 BY MR. BUCKLEY: It looks like this is from one of the 10 Q. investigators in the office of the DA. And it says, 11 12 "On Friday, the 31st of January 2014," sometime after 13 Gerald was terminated, "I prepared and sent an email to Colin Slay requesting some information related to the 14 investigation involving Bostock. I requested to whom 15 would be the point of contact for the individuals that 16 17 could provide me documentation related to the cases that a judge ordered CASA intervention and payments 18 19 received. I requested an update on the missing GAL 20 bank statements, if they had been recovered. missing records are as follows: January 2011, May to 21 June 2012, and September to October of 2012." 22 Were those records ever recovered? 23 24 Α. Not to my knowledge.

Regency-Brentano, Inc.

Do you know what they -- now, these are --

25

0.

203

the bank statements would have been at least in the control of Friends of Clayton County CASA; right?

A. They should have been, yes, sir.

Q. Do you know if anybody asked them if they

Q. Do you know if anybody asked them if they could get those bank statements?

A. CASA staff, primarily Ms. Gossett. And I think Ms. Chilumuna went through everything that we had in storage. And I believe they contacted --

Q. Okay.

10 A. -- board members to see if they had -- I
11 know they contacted Dee Haney.

12 Q. Okay.

1

2

3

4

5

6

7

8

9

13

16

17

18

19

20

21

22

23

24

25

A. Who's the current chair.

Q. Do you know if they agreed to let you all have the records?

A. The records were housed, again, at the court facility. And there was never any hesitance whatsoever on the part of the board.

Q. Okay. All right. So you don't know whether those records were ever sent over to the DA's office or not?

A. To my knowledge, they weren't.

Q. Okay.

A. I didn't send them, I can tell you that.

Q. All right. So this is Exhibit 26.

204

1 (Exhibit Number P-26 was presented.) 2 BY MR. BUCKLEY: It is another email apparently from the DA's 3 Q. It says that they received an email response 4 5 from you in which you directed them to look for the contracts through Carol Gossett; right? 6 7 That Carol would be the best point of 8 contact for information --9 Q. Okay. -- he was seeking. 10 Α. 11 Q. All right. And then Exhibit 27 -- by the 12 way, you haven't seen 26 before yourself; right? 13 Α. No, sir. Okay. This is Exhibit 27. 14 Q. (Exhibit Number P-27 was presented.) 15 16 BY MR. BUCKLEY: This is a memo from Allen Crenshaw. 17 Q. Ιt says, "On Friday, December 6, 2013, I sent an email to 18 19 Colin Slay requesting the following," and he says, 20 "Minutes for the Friends of Clayton County CASA, Inc., meetings from July 20, 2011, to such time that Gerald 21 Bostock was terminated," and also "Minutes for the 22 23 Friends of Clayton County CASA, Inc., Duck Derby 24 meetings, September 14, 2011, at such time Gerald Bostock was term" -- "to such time Gerald 25

205

1 Bostock was terminated from his employment." 2 Do you know if those records were turned over? 3 I don't. I don't know. I don't remember. 4 Α. 5 Do you know whether Ms. Gossett had Clayton Q. 6 County -- Friends of Clayton County CASA board meeting 7 minutes in her office? 8 Α. Not in her office. They were stored in a 9 storage room in the CASA unit. And the court had custody of those records. 10 Q. Yeah, they were kept --11 Α. 12 Q. Okay. 13 Α. I think that was the case, except for a period of time where they maintained an office. 14 15 Okay. Let me show you what's marked as Q. Plaintiff's Exhibit Number 28. 16 17 (Exhibit Number P-28 was presented.) BY MR. BUCKLEY: 18 19 This appears to be an email chain dated in Q. 20 or about December 4th, 2013. It looks like you sent an email on December 4th saying, "I was checking to see if 21 22 there was any update on the investigation. Mr. Bostock 23 has filed an EEOC complaint." 24 Okay. So was it at or about that time that

you learned that Mr. Bostock had filed an EEOC

206

1	complaint?
2	A. I believe it would have been directly before
3	that.
4	Q. Okay.
5	A. Mr. Johnson notified me of that.
6	Q. Okay.
7	A. And he's the one that I expressly
8	remember he's the one that asked me to get an update on
9	the investigation.
10	Q. Going back to your phone situation, had you
11	switched phones at that point, or did you still have
12	your old telephones?
13	A. On 2000 oh, December of 2000
14	Q. December 4th.
15	A '13. I believe I had the iPhone at that
16	point.
17	Q. Okay. Why what relevance did it have to
18	the investigation that Gerald had filed an EEOC
19	complaint?
20	A. I don't know.
21	Q. Why did you feel the need to tell the
22	investigator that Gerald had filed an EEOC complaint?
23	A. Oh, as I previously stated, I was directed
24	by Mr. Johnson to get an update, and it came in

relation to that. But I don't --

207

- Q. Well, I get it. Did Johnson tell you to inform the investigator that Gerald had filed an EEOC complaint?
 - A. Yes.

1

2

3

4

7

- Q. Was it Johnson's desire to get a criminal indictment against Gerald?
 - A. I have no idea what his desire was.
 - Q. Did he ever express that desire?
- 9 A. No, not that I recall.
- Q. Did he or you or Judge Teske want Gerald to be criminally indicted in order to defend against any EEOC complaint?
- 13 A. No.
- MR. HILL: I'll object to form. Go ahead.
- 15 BY MR. BUCKLEY:
- Q. Go ahead.
- A. No. I expressly remember Judge Teske, for instance, saying he was glad that they didn't find anything and that it went down that road.
- Q. Okay. So here it says, on December 4th,
 looks like Dennis Baker writes to you, "Allen Crenshaw
 and I meet on Friday to go over the bank records we
 have received and to see if there is any further
 investigative processes we need to make. May I can
 you" -- I guess it means -- he meant "may I call you

208

1 after that meeting to give you a further update?" 2 Right? And then you said, "That would be great. Thank 3 you, Dennis." Right? Uh-huh (affirmative). 4 Α. Did he call you with an update at or about 5 Q. that time? 6 7 I don't remember -- I don't remember a phone call after that. 8 Did they ever call you and say, "We just 9 Q. haven't found evidence to sustain or support an 10 indictment"? 11 I never got any information directly from 12 Α. 13 the DA's office about that. I learned of that decision 14 from Judge Teske. Tell me about that conversation. 15 Q. Okay. About the conversation with Judge Teske? 16 Α. Right, about that. And, first of all, when 17 Q. was that conversation? 18 19 Α. I don't know. I don't remember. I mean, it 20 would have been maybe a year or two after this, but I don't remember --21 22 Q. Okay. 23 -- exactly when it occurred. Α. 24 Q. Was it in his chambers? 25 Α. Yes. It was --

209

- 1 Did you frequently meet with Judge Q. Okay. 2 Teske in his chambers? Yeah, it was a pretty regular occurrence. 3 Α. Okay. Do you ever socialize with Judge
 - I've gone to his house for dinner a few Α. times. And certainly when we've traveled together, you know, we've had dinner and maybe a drink or something, a cigar.
 - What kind of occasions did you and Judge Q. Teske travel on?
 - We are part of a technical assistance team Α. is probably the best way to describe it, so we receive requests through the Annie Casey Foundation --
 - Q. Okay.

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

Q.

Teske?

- -- to provide assistance from other Α. jurisdictions on developing primarily school justice partnerships and sometimes other detention reforms. that was often where the travel was. There have been other occasions where we've gone to like a judge's conference or --
 - Q. Okay.
- 23 -- we've presented together at some other Α. 24 event.
- Is that -- that's courthouse business, 25 0.

210

1 right, when y'all have traveled together, I mean? 2 Α. Being on --When you and Judge Teske have taken trips 3 Q. together, has it always been on court business? 4 5 I guess you could say that because --Α. 6 Q. Right. 7 Α. -- we were traveling on the court -- the 8 county's time. 9 Right. And the county was paying your Q. expenses for the trip? 10 11 Α. No. 12 Q. Did the county pay for your hotel room? 13 Α. No. Didn't pay for your dinners or anything? 14 Q. 15 No, sir. All of that was paid for by the Α. Annie Casey Foundation. 16 17 Q. I see. So every time you and Judge Casey traveled -- I'm sorry, Judge Casey -- Judge Teske 18 19 traveled together, it was on the Annie B. Casey 20 Foundation? Not -- when we were doing the technical 21 Α. 22 assistance, that would have been true. Now, there 23 would have been a possible time where we went to a 24 conference, for example, maybe a Coalition for Juvenile

Justice conference --

211

1 Okay. Q. 2 Α. -- where the county would have paid for 3 that. They would have paid your room and board for 4 Q. 5 those trips? 6 Α. Right. 7 Q. Okay. How many times do you think you and 8 Judge Teske have gone on such trips? 9 At this point, honestly, it's --Α. Handful? 10 Q. No, far more than that. I mean, we've been 11 A. to over 50 jurisdictions. 12 13 Q. Okay. So when they paid for your meals, did they pay -- did the county pay for your drinks? 14 15 County? Α. 16 Q. Yep. No, sir. 17 Α. Who paid -- would the juvenile court pay for 18 Q. your drinks? 19 20 Α. No. Who paid for your drinks? 21 Q. I paid for my drinks. 22 Α. Did you -- did the county pay for -- did you 23 Q. 24 like pay for your meal with one credit card and then you paid for your drinks with your personal credit 25

212

1 card? 2 Α. They -- no. We pay and have to submit reimbursement for the county. 3 Okay. So --4 Q. 5 Α. They don't do advances. 6 So you pay -- when you do that, when you pay Q. 7 for your dinner and you decide you're going to have a drink with your dinner, do you actually run a separate 8 9 tab? I do. I usually ask -- I explain the 10 Α. situation, and most --11 12 Q. Okay. 13 Α. I've never had a server look at me funny. How about the cigars? Are those on the 14 Q. 15 county, or are those on you? 16 Those are mine. Α. 17 Q. Okay. Out of my humidor. 18 Α. 19 Q. All right. So how frequently do you 20 normally meet with Judge Teske in chambers? Well, before the pandemic, I would say it 21 Α. was at least weekly, sometimes more frequently just 22 23 depending on, you know, if I had a matter I needed to 24 discuss with him. 25 0. Okay. Would you say that you and Judge

213

Teske are friends? 1 2 Α. I would. Okay. Let me show you Plaintiff's 3 Q. Exhibit 29, which I think is a slightly different 4 5 version of 28. Okay? (Exhibit Number P-29 was presented.) 6 7 BY MR. BUCKLEY: 8 Q. In this, it appears to be the same December 4th email 2013 that you sent -- excuse me. 9 10 MR. HILL: Sorry. 11 MR. BUCKLEY: Okay. Thank you. BY MR. BUCKLEY: 12 13 Q. It appears to be the same December 20 -- I'm sorry -- the same December 4th --14 15 Α. Right. -- 2013 email you sent saying, "Dennis, I 16 17 was checking to see if there is any update on the investigation. Mr. Bostock has filed an EEOC 18 19 complaint. Thanks." 20 And you sent that to Dennis Johnson, and who is Dennis Johnson now? 21 He was the -- or is the assistant director 22 Α. 23 of the finance department. 24 Q. Okay. I hit the -- I clicked on the wrong Dennis 25 Α.

214

1 when I started typing this. 2 Q. Okay. I see. So you sent that --It was meant for Dennis Baker. Α. 3 It was meant for Dennis Baker. So then you 4 Q. 5 -- it basically looks like you cut and pasted the very 6 same email and sent it to Dennis Baker; is that right? 7 Α. That's what it looks like, yes, sir. 8 Q. Okay. I get it. All right. Thank you. 9 Sometimes the fingers are faster than the Α. mind. 10 11 Q. Right. Okay. 12 MR. BUCKLEY: He needs to change out, so 13 we'll take a break here. THE VIDEOGRAPHER: We're off the record. 14 15 (VIDEO CAMERA OFF.) 16 (A brief recess was taken.) 17 (VIDEO CAMERA ON.) THE VIDEOGRAPHER: We're back on the record. 18 19 MR. BUCKLEY: Okay. Good. 20 BY MR. BUCKLEY: In June of 2020, long after Mr. Bostock had 21 Q. been terminated, you sent the internal audit report to 22 23 Judge Teske. Do you know why you suddenly did that? 24 Α. In June of 2020? 25 0. Yep.

215

1 Α. It probably would have just been a request 2 from him --3 Q. Okay. Α. -- to provide him with a copy --4 5 Do you know --Q. 6 -- or send it to him. Α. 7 Q. Was there any event that caused him to 8 request --9 Α. In June of 2020? 10 Q. Yep. I think it was probably in preparation for 11 A. 12 this. 13 Q. For this. Okay. (Exhibit Number P-30 was presented.) 14 15 BY MR. BUCKLEY: 16 Showing you what's marked as Plaintiff's Q. 17 Exhibit 30. It's just a little short email from you dated 6/16/2020, captioned Bostock Internal Audit 18 19 Report. It says, "Judge, the internal audit report you 20 requested is attached." He asked for it. You don't know of any 21 event that prompted that? 22 23 Α. I'm not -- I don't know for sure, no. 24 Q. Could it be that that was just a few days or a day or so after the Supreme Court came down with its 25

216

decision on this case? 1 2 Α. It might have been. I don't remember --3 Q. Okay. -- when that happened. 4 Α. 5 Do you know what the purpose was of Q. 6 furnishing the audit report? Was that to load up the 7 judge with things to say about Mr. Bostock? 8 Α. I was responding to a directive from my 9 supervisor, my boss. All right. Well, let me show you what's 10 Q. marked as Plaintiff's Exhibit 31. 11 12 (Exhibit Number P-31 was presented.) 13 BY MR. BUCKLEY: This is a document Bates stamped Clayton 14 It's an email from Colin Slay dated June 17th, 15 2020, subject, Mr. Bostock's lawsuit. And I want to 16 17 know what the recipient group of this is. It says -go ahead. 18 19 Α. It's the entire juvenile court. 20 Everybody in the juvenile court? Q. That's employed, yes, sir. 21 Α. So that means all the judges, all the staff, 22 Q. 23 everybody from top to bottom; right? 24 Α. Yes, sir. And here you circulate this, you say, 25 Q.

217

1 "Many of you have likely heard about the U.S. Supreme 2 Court decision involving a suit that former juvenile court employee Gerald Bostock filed in response to his 3 termination of employment in 2013. While I cannot 4 5 comment on pending litigation, I would like to share 6 this article from the Atlanta Journal-Constitution. 7 gives a different side of the story than the narrative that has been widely portrayed in most other media outlets."

Now, when you circulated this -- now, this is an AJC article that discusses an interview with Judge Steven Teske; correct?

Α. Yes, I believe so.

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

- And it's an interview in which Judge Teske Q. basically tells the reporter that Gerald Bostock was not fired because of his sexual orientation, he was fired because of the misappropriation of funds; right?
- I don't remember the exact wording. Α. something to that effect.
- All right. So -- and when you circulated ο. this document to the entirety of the juvenile court, did it occur to you that you, by circulating this, were influencing potential witnesses in the case?
 - Α. I did what I was instructed to do.
 - Who told you to do that? 0.

218

1 Α. Judge Teske. 2 Q. All right. So Teske told you to circulate this. I'm going to ask you the same question. Did it 3 occur to you that you were circulating a version of the 4 5 facts, if you will --I was circulating an article --6 7 MR. HILL: Wait. Let him finish the 8 question. 9 THE WITNESS: Oh, I thought he was -- sorry. BY MR. BUCKLEY: 10 Let me finish -- a version of the facts 11 Q. 12 contained in the article, yes, to people who were 13 potential witnesses in the case? I didn't consider that. 14 Α. Okay. But, in fact, some of the people who 15 Q. you circulated it to are potential witnesses in the 16 17 case; right? Sure, who have access to the Atlanta 18 Journal-Constitution on their own accord. 19 20 But by having the -- I guess you're the --0. at this point you were -- what was your position at 21 this point? 22

A. Director of juvenile court operations.

23

24

25

Q. So by having the director of juvenile court operations circulate this article rather than people

just casually reading it in the AJC as they might or might not -
A. Right, right.

Q. -- you were highlighting a particular
version of this facts -- of the facts in this case
favorable to Clayton County government to employees who
get their paychecks from Clayton County government;
correct?

MR. HILL: Object to form.

A. Again, I was doing as I was instructed.

BY MR. BUCKLEY:

9

10

11

12

15

16

17

18

19

20

21

22

23

24

25

Q. I got it.

A. I didn't put a lot of thought into it. When my boss --

Q. Okay.

A. -- tells me to do something that's not blatantly illegal, then I do what I'm told to do.

Q. Well, do you know if it's illegal or not to circulate a version of the facts to every -- or most of the potential witnesses in the case coming from the top of the Clayton County Juvenile Court administration?

A. I would say it's a mischaracterization to say most of the witnesses in the case. As in the other document that we went through where I presented the people that I thought had knowledge of the case, most

Regency-Brentano, Inc.

220

1 of them are no longer employed with this court. 2 Q. Well, there are many people still employed with Clayton County --3 Α. There are about two or three. 4 5 There are a number of people employed in the Q. 6 Clayton County courthouse who have knowledge of 7 Gerald's performance in his job; right? 8 Α. There were two or three left --9 Q. Okay. -- at the time this was sent. 10 Α. Well, let's suppose and imagine you only 11 Q. 12 circulated this to those two or three people. 13 Certainly that would be an effort to influence their outlook on the case and perhaps could influence their 14 testimony; true? 15 MR. HILL: Object to the form of the 16 17 question. BY MR. BUCKLEY: 18 19 Q. Right? 20 My intent was not to influence anyone. intent was to follow the directions of my supervisor. 21 BY MR. BUCKLEY: 22 23 Well, what do you think the intentions of Q. 24 your supervisor were?

I'm not going to go into --

25

Α.

221

MR. HILL: Objection. 1 2 Α. Yeah, I don't know what his intentions were. BY MR. BUCKLEY: 3 Did it occur to you that Judge Teske, by 4 Q. 5 trying to promulgate his version of events, was trying 6 to influence the testimony of witnesses? 7 Α. No, it did not occur to me that --8 Q. Okay. Well, now that you've thought about 9 it, does it now occur to you that he might have been trying to influence the testimony of witnesses? 10 11 Α. I don't know what he was trying to do --12 Q. Okay. 13 -- with that, other than we routinely share news articles of anything that has to do with our 14 That's sort of a common practice, which is --15 this wasn't out of character with that. 16 17 Q. Let me show you Exhibit 35. 18 (Exhibit Number P-35 was presented.) BY MR. BUCKLEY: 19 20 And perhaps you weren't in a position where 0. you would even know about this memorandum. 21 22 don't, you can say so. But it's dated October 23rd,

Regency-Brentano, Inc.

What position were you occupying at that

2008, to Gerald Bostock, Child Welfare coordinator,

from John P. Johnson III, director of Juvenile Court

23

24

25

Services.

222

1 point in time? 2 Α. 2008, I would have been the JDAI coordinator, I believe. 3 And here he seems to -- he says, "It has 4 Q. 5 come to my attention in a conversation with the finance 6 department that there are some questions that need to 7 be answered, at least inhouse, so that the 8 administrator and judges are not being kept in the 9 dark. Since CASA is a court-sponsored program tied directly to the judges, they have a right to know the 10 financial status. I have been made aware that there 11 12 are funds coming from the Superior Court Custody 13 Investigations and being placed into the CASA's bank account." 14 Do you know what that's referring to there 15 at all, the Superior Court Custody Investigations? 16 That would -- that term had been used sort 17 Α. of interchangeably with the GAL. It's referring to the 18 19 GAL --20 It's referring to --Q. 21 Α. -- program. -- the \$500 payment --22 Q. 23 Α. Yes. 24 -- we've been talking about all day; right? Q. 25 Α. Yes.

223

1 "And being placed in CASA's" -- he Q. Okay. 2 says, "I have been made aware there are funds coming from the Superior Court Custody Investigations and 3 being placed in the CASA's bank account." 4 5 That activity, to your knowledge, had been 6 going on for some time; right? 7 Α. Looks like --8 Q. Well, at least --9 -- less than a year. Α. It says 2007; right? 10 Q. 11 Α. Yeah. When the MOU was entered into? 12 Q. 13 Α. Right. Okay. So he's just finding out that this is 14 Q. occurring. He says, "I have consulted with Judge Teske 15 in regards to this matter with the discussion resulting 16 17 in this memo. Therefore, I am asking for financial disclosure. One, is Ms. Gossett being paid in addition 18 19 to her county salary," I guess meaning is she being 20 paid by Friends of Clayton County CASA, do you know? I don't know what he was -- the first time I 21 Α. 22 ever saw this --23 Okay. Q. 24 -- was in relation to the lawsuit. Α.

So you saw this as you were gathering

25

Q.

ſ	
1	documents
2	A. Right.
3	Q for the lawsuit?
4	A. Right.
5	Q. Did you ask any questions of anybody about
6	it, what was this about?
7	A. The only person that would be there would be
8	Judge Teske. But, no, I didn't. I just turned it over
9	to our attorneys.
10	Q. Well, Johnson would know because Johnson's
11	still there.
12	A. But he no, he wasn't there when this
13	stuff started.
14	Q. Well, it says it's from Johnson to Bostock,
15	this memo.
16	A. Right. But Mr. Johnson when I saw this,
17	Mr. Johnson had retired. He was no longer at the
18	court.
19	Q. Okay. All right. When did Mr. Johnson
20	retire?
21	A. 2018, June, I believe it was, 2018. His
22	official that's when he left. His official
23	retirement I think was in August. He had leave that
24	he
25	Q. Who is the new the new I guess court

225

Video Deposition

administrator? Well, you.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

- A. Yeah, I am.
- Q. Okay. Sorry. Excuse me. Little brain lapse there. It says, "Are you being paid by the Friends of CASA or the advisory board?" Okay. To your knowledge, Gerald was not being paid by the Friends of Clayton County CASA?
- A. No, I had no knowledge of that, no.
- Q. Okay. It says, "Please submit a monthly budget report to me containing all incoming and outgoing funds due on the 5th of each month starting November 5th, 2008."
- And then it looks like, again, in -- so that, did you start getting that report as soon as you stepped into your position?
- A. I don't recall when exactly I started getting those reports.
- 18 Q. Okay.
- A. I honestly don't remember if it's when I
 stepped into the position or if it started sometime
 after that sort of cursory glance at the MOU income
 process. I don't remember when.
- Q. When you were having conversations with

 Mr. -- well, I'm sorry -- Judge Teske leading up to

 Gerald's termination, did he discuss either with you or

226

1 in your presence the fact that Clayton County --2 Friends of Clayton County CASA funds were being spent 3 in gay bars? Well, he probably said that. 4 Α. 5 Okay. Q. In relation to the audit report. 6 Α. 7 ο. Okay. And then did he mention in your 8 presence or discuss in your presence the fact that 9 Friends of Clayton County CASA funds were being spent to sponsor a gay softball team? 10 I don't remember gay softball team, that 11 Α. 12 language being used. I remember a reference to the 13 softball team. Between you and Johnson and Teske, during 14 Q. the course of talking about the softball team and the 15 sponsorship of the softball team, was there any mention 16 17 of the fact that this was a gay softball team or that this softball team was part of a gay softball league? 18 19 Α. I don't recall there being any emphasis on 20 There - we obviously discussed the softball 21 league. 22 Q. Okay. 23 If -- the term gay could have been used, but Α. I don't remember there being --24

25

0.

Okay.

227

A. -- any major emphasis being placed on that term or that fact.

- Q. In the course of the events leading up to Gerald's -- if you already testified about this, I'm trying to recall if you remember being present when Johnson recommended that Gerald be terminated or --
 - A. To Judge Teske?
- Q. Correct.

3

4

5

6

7

8

9

14

15

16

17

18

- A. Yes, I was there.
- Q. You were there. And Johnson -- I just want to make it clear. Johnson expressly recommended that to Teske?
- 13 A. Yes, I believe so.
 - Q. Okay. And when he did, did Johnson cite to any of these things we've been talking about, the sponsorship of the softball team or the expenditure of funds in gay bars or gay restaurants?
 - A. We went through the audit report and the findings of the audit report.
- Q. Okay. Same question though. Was there any express mention by Johnson of the fact that funds were being spent in gay bars?
- 23 A. I don't recall that.
- Q. Okay. When you say you don't recall, you're not saying it didn't happen. You --

228

1 I don't recall. I don't remember --Α. 2 Q. Okay. -- the specifics of the conversation. 3 Α. Who is Shelley Johnson? 4 Q. 5 She was a CASA volunteer supervisor. Α. Okay. And she was -- was she also a 6 Q. member -- so she's a member of the court staff. 7 8 Α. Correct. 9 She's paid by the court. Q. 10 Α. Correct. 11 Q. And her job is to supervise the CASA 12 volunteers? 13 Α. That's right. Is she the only CASA volunteer supervisor? 14 Q. 15 Α. No, there were several. 16 Q. Okay. I think five or six more, if I remember. 17 Α. Have you had much in the way of dealings 18 Q. 19 with Ms. Johnson, Shelley? 20 Have I had dealings with her? Α. 21 Q. Yeah. 22 Α. I mean, I've spoken to her, of course. She 23 was within my chain of command. 24 Q. I mean, have you worked on anything together with her or has she reported to you or anything of that

229

1 nature? 2 Α. Not directly. 3 Q. Okay. I mean, my interaction was more casual with 4 Α. 5 her. 6 In your dealings with her, have you Q. 7 found her to be credible? 8 Α. Yeah. 9 Okay. Her deposition has been taken in this Q. case, and she testified -- I'm going to read testimony 10 to you -- "Judge Teske called a meeting the day that 11 12 Gerald was terminated, and we all reported to the 13 common area where we usually have meetings and functions. It was Judge Teske and Colin and John 14 15 Johnson." 16 Does that -- I had asked you earlier if you 17 were present at that meeting, and you couldn't quite remember. 18 19 Α. I -- I don't remember that meeting. 20 Q. Okay. I don't. 21 Α. But not remembering it isn't the same as 22 Q. 23 saying I wasn't there. 24 Α. That's right. 25 0. Okay.

1	A. But I don't remember I don't even
2	remember attending that meeting. I don't know if
3	Q. If she said you were there, you're not in a
4	position to dispute that.
5	A. I'm not going to call her a liar, no.
6	Q. Okay. It says that "Judge Teske led the
7	meeting and basically told us that Gerald was
8	terminated because he misappropriated funds in
9	sponsoring the gay softball team and that the court
10	would not tolerate that type of behavior." That's her
11	testimony.
12	Did Judge Teske ever in your presence say
13	anything of that nature, to your recollection?
14	A. That in particular, I mean, he's mentioned
15	the softball team, and he may have mentioned that it
16	was part of a, you know, gay softball league. But
17	Q. Okay.
18	A that's you know.
19	Q. Okay. Do you recall that at or right after
20	this meeting that Richard Belcher, the reporter, was
21	present at the courthouse?
22	A. I know that he was there at some point. I
23	didn't see him
24	Q. Okay.
25	A or have any interaction with him, so I

231

1 don't remember when that occurred. 2 Q. How do you happen to know that he was there? Α. Well, I mean, he did a news piece on it, 3 4 yeah. 5 He interviewed Judge Teske; right? Q. Yes, sir. 6 Α. Yeah. 7 Q. So you saw the news report? 8 Α. Yeah, I believe so. 9 Do you recall Judge Teske telling the Q. employees that they were not to discuss the matter or 10 that they were to keep it confidential? 11 12 Α. Like I said, I don't even remember being at 13 that meeting, so I don't --So you're not able to admit that or 14 Q. Okay. deny that. 15 Right. I don't remember it. 16 Α. 17 Q. Did you talk to Judge Teske at all about the case before you appeared for your deposition here 18 19 today? 20 To Judge Teske? Α. 21 Q. Yes. 22 Α. No. 23 Did you talk to Mr. Johnson about the case Q. 24 before appearing for your deposition here today?

25

Α.

I saw him at the 5K, and he asked me if I

232

1 had been deposed yet. And at that time I don't even 2 think it had been scheduled, and I think I told him, "No, but I think it's soon." 3 Q. 4 Okay. 5 Α. And that was the extent of the conversation. All right. You were aware early in your 6 Q. 7 relationship with Gerald that he's gay; right? 8 Α. Yeah. 9 Did he tell you, or you just heard Q. it, or do you even remember? 10 I don't remember. I know at one of the -- I 11 Α. 12 believe it might have been one of the Duck Derby events 13 I met his partner at the time. He intro -- Gerald introduced me to him. 14 15 Q. Okay. I don't remember when that was or --16 Α. You've attended a number of CASA events over 17 Q. the years; right? 18 19 Α. Yes. 20 Okay. Did you ever consume alcohol at any 0. of those events? 21 I believe the event at the Chili's that I 22 Α. 23 referenced earlier today. Uh-huh, yeah. 24 Q.

I believe I had a drink or two at that

25

Α.

233

1 event. 2 Q. Do you remember who picked up the tab for those drinks? 3 I paid for those drinks at the bar. 4 Α. 5 You paid for them at the bar? Q. 6 Α. Yes. 7 0. Do you recall an event where Judge Teske was 8 present, Gerald was present, you were present, and a 9 number of people had drinks and didn't pay for them and Judge Teske told Gerald, "I'll pay half the tab, 10 Clayton County CASA can pay the other half or the 11 12 Friends of Clayton County CASA can pay the other half"? 13 Do you remember that? I wasn't a party to that conversation. 14 remember that it may -- I remember an event where 15

- A. I wasn't a party to that conversation. I remember that it may -- I remember an event where several people were drinking. In fact, I believe it was that same event I was referring to at the Chili's.
- 18 Q. Okay.

16

17

23

24

- 19 A. But I don't remember that conversation.
- Q. You don't remember specifically how other
 people's drinks were paid for or whether Judge Teske
 actually encouraged Gerald to pay for them with --
 - A. I don't know that.
 - Q. -- CASA funds?
 - A. No, I don't know that.

r	
1	Q. Okay. Were you ever a member of Friends of
2	Clayton County CASA?
3	A. A member?
4	Q. Yep.
5	A. No.
6	Q. Volunteer you wouldn't do that because
7	you're running the court; right?
8	A. Right.
9	Q. Okay. So once the clerk of court took
10	control of these \$500 payments into the court, did you
11	have any involvement with the specific use or
12	maintenance of the fund that those dollars were paid
13	into?
14	A. Direct involvement?
15	Q. Yes.
16	A. No, sir.
17	Q. Indirect?
18	A. Indirect in that my chief of staff approves
19	for those expenditures now. She's under me.
20	Q. Are they kept in a separate account, or are
21	they simply in the account of the clerk of court?
22	A. They're the funds are credited to a
23	separate line item within the court's we have a
24	single account.
25	Q. Okay.

235

- A. And it's done through the accounting process.
 - Q. So there's a single account for the clerk's office, but CASA-related funds paid into the account are -- they're ledgered --
- A. Yes.

1

2

3

4

5

6

7

17

18

19

20

21

22

23

24

- Q. -- separately?
- 8 A. Yes.
- 9 Q. And --
- 10 A. There's a separate line item for that.
- Q. Okay. So if I wanted to know the amount of funds in that line item or anything about the expenditure of those funds, then that line item, I could do an open records request to your office, for instance?
- 16 A. Yeah, in their records.
 - Q. Okay. Did you -- when you were supervising and managing Gerald, did you all meet regularly?
 - A. I don't know that we had -- there was a period of time where I had regularly scheduled staff meetings with -- or supervisors meetings with all the supervisors. But Gerald and I certainly met fairly frequently. I mean, we -- you know, at least once or twice a week we would have -- I would more of informal stop by, "Hey, this is what's going on," that kind of

236

stuff. That was fairly frequent, yes.

- Q. Sometimes he'd stop by your office, and sometimes you'd stop by his?
 - A. Right, right.

1

2

3

4

5

6

7

8

9

10

- Q. Okay. Did you find your dealings with him to be professional?
- A. I never had an issue with Gerald. Gerald and I, like I said before, there were times that we might not agree on the approach to something, but those conversations were always professional, and I didn't have any problem getting along with Gerald.
- Q. Have you ever talked to Black, Mr. Black,
 Shawn Black, after he sent that email that we've
 already looked at that's Exhibit 19?
- 15 A. I believe I ran into him some years

 16 afterwards somewhere, but I've not had any kind of

 17 in-depth conversation --
- 18 Q. Okay.
- 19 A. -- with him about anything.
- Q. Who specifically commissioned the audit and report with respect to Friends of Clayton County CASA?
- 22 A. Chairman Turner.
- 23 Q. Chair --
- 24 A. Chairman Jeff --
- 25 Q. Chairman Turner.

- 237
- 1 A. -- Turner, the chairman of the Board of 2 Commissioners.
 - Q. Was this at somebody's request?
 - A. At -- yes, at John Johnson's request per the instruction of Judge Teske.
 - Q. Chairman Turner did not have any input into the decision to terminate Gerald, did he?
 - A. No, sir.

3

4

5

6

7

8

14

15

16

17

18

19

20

21

22

23

24

- 9 Q. Were you interviewed during the audit 10 process?
- A. I talked to Stacey Merritt and Leslie -well, Stacey Merritt at the beginning. I wasn't
 interviewed per se.
 - Q. Okay. Do you remember the substance of that conversation?
 - A. That's where we shared the concerns, John and I, that we had about the GAL account expenditures.
 - Q. Well, when you say you shared your concerns, was the basis of those concerns the Black email, or what was the basis of those concerns at the point in time you talked with her?
 - A. I think that was the prime -- primarily what we shared was that these accusations have been made, that we don't have access to or the ability to review them ourselves.

Q. Yep.

- A. You're a professional auditor, can you look at that.
- Q. Okay. Let's look at that audit report. I think you already have it in front of you --
 - A. Yeah.
 - Q. -- as Exhibit 10. Okay. We're not going to go through every line of it, but I want to -- there is -- it's not an overly long report. When you received the audit report, were there any attachments to it beyond what you see in Exhibit 10?
- 12 A. Not that I recall.
 - Q. Okay. So it starts with an introduction, and it actually says, "In response to a request from the Chief Juvenile Court Judge Steve Teske and a directive from Chairman Turner, we have conducted an audit." Okay. And then the objectives, it states the statement of objectives is "to evaluate the internal controls and procedures for receipting and disbursement." Okay.

And they also looked at whether the funds were used in accordance with established Friends of Clayton County CASA bylaws and the memorandum of understanding that we've all looked at here. It goes on and has a statement of scope and methodology, a

Regency-Brentano, Inc.

239

statement of auditing standards, and then background on the Clayton County CASA program.

And I'm a little concerned here about conflating Clayton County CASA with the Friends of Clayton County CASA, Inc. Were they auditing Clayton County CASA, or were they auditing Friends of Clayton County CASA, Inc.?

- A. Well, they were auditing the bank accounts that belonged to Friends of Clayton County CASA.
 - Q. Right, that's what I thought.
- 11 A. Because at that time there weren't any 12 accounts --
- 13 Q. Okay.

1

2

3

4

5

6

7

8

9

10

15

16

17

18

19

20

21

- 14 A. -- associated with CASA itself.
 - Q. And it said the focus of the audit was primarily the Guardian Ad Litem account, and it recites that the account collects an administrative fee of \$500 per case as ordered by the Clayton County Superior Court. I thought that the administrative fee collection was ordered by the Clayton County Juvenile
- 22 A. No.

Court.

- 23 Q. Okay.
- 24 A. These are superior court cases.
- 25 Q. Okay. I thought you mentioned earlier that

240

1 Judge Teske would order the payment of the \$500. No? 2 Α. No, it would be a superior court judge. All right. So the first -- there's 3 Q. Okay. observations and recommendations; right? And as we go 4 5 through those, the first thing they note in the first 6 section is "Clayton County CASA programs currently have 7 no written policies and procedures regarding specific details of how the funds should be maintained. 8 9 also no specifics on what is acceptable under the categories of volunteer recruitment, training, and 10 retention." 11 12 And then they make a recommendation on what 13 should be done there; right? Right. 14 Α. Okay. By the way, the MOU, which is 15 Q. Exhibit 3, you mentioned earlier that Gerald drafted 16 17 that document. Do you remember that testimony? 18 Α. That's what I was told. 19 Q. Okay. 20 Α. Right. And you were told that by who, Judge Teske? 21 Q.

A. I believe so, yes, sir.

22

23

24

25

Q. Okay. Are you aware that he actually did not draft it, that there was somebody in his program that drafted it and it was circulated widely among the

241

court staff, including Judge Teske, for editing and comment before it was finalized?

- A. I don't know anything myself about how any of that occurred. I was --
- 5 Q. Okay.

1

2

3

4

8

9

10

11

12

- A. -- not involved in the court administration at that point.
 - Q. Do you realize that or did you know that at one point there was an initial draft that had, among other people, Judge Teske as signatory, but Judge Teske struck through that and was not a signatory upon his request?
- 13 A. I didn't -- I don't know that.
- Q. Okay. All right. So you have no -- when
 you said that, you had no personal knowledge of who the
 draftsperson was.
 - A. No. I was relaying what I was told.
- Q. Okay. So they make a recommendation of a detailed SOP for internal cash controls. And that SOP, to your knowledge, had not ever been drafted; right?
- 21 A. Has not?
- Q. Had not.
- 23 A. Oh, not at that time.
- Q. At that time. And is it -- it's not your testimony either that Gerald Bostock was personally

242

responsible for drafting those SOPs?

- A. It was under his purview to make sure controls were in place.
- Q. Well, let me ask the question. Was he, to your knowledge, charged by anyone with drafting the SOPs for the handling of these monies?
 - A. Not to my knowledge.
- 8 Q. Okay.

1

2

3

4

5

6

7

9

11

12

13

14

15

16

17

18

19

20

21

22

23

- A. I'm basing my answer off of --
- 10 Q. Okay.
 - A. -- the assumption that a reasonable person that has control of lots of money would have policies and procedures and controls in place so that there could not even be the appearance of wrongdoing.
 - Q. And do you know whether he had discussions with the Friends of Clayton County CASA board and board members specifically about how those monies should be handled and what were proper expenditures?
 - A. I don't know.
 - Q. If he did, then there may have been policies and procedures. You might not have liked them, but there may have been policies and procedures in place that you weren't aware of.
- 24 A. Right. I never saw anything in writing --
 - Q. Okay.

243

1 -- that listed how things were --Α. 2 Q. All right. -- supposed to be handled. 3 Α. Okay. So --4 Q. 5 Well, let me clarify that. Α. 6 Go ahead. Q. 7 Α. The only thing I ever saw in writing that 8 had anything at all to do with how the funds were to be 9 handled were -- was in the bylaws, as I mentioned before, where it talks about --10 11 Q. Okay. 12 -- the president's supposed to sign off on 13 expenditures -- or the chairperson, I'm sorry. And if it were over \$500, I believe the chairperson and the 14 treasurer were supposed to sign off on it. 15 Do you have any knowledge as to whether that 16 Q. 17 -- whether or not that practice was followed? 18 Α. I don't. 19 Okay. And I'm not saying you should. Q. 20 Yeah, yeah, I don't --Α. But I just want to be sure you're not about 21 Q. to testify, "Oh, that policy in the bylaws was not 22 followed." 23 24 Α. I was just clarifying that's the only No.

thing I've ever seen, because I just said I never saw

244

1 anything in writing, but --2 Q. Okay. -- I wanted to make sure that that wasn't --Α. 3 that that's the only thing I'd ever seen in writing. 4 5 Okay. So they recommend then that the funds Q. 6 be paid through the office of the Clerk of the Juvenile 7 And they go on to say here, "the Child Welfare 8 Service coordinator's activity with the funds is a direct violation of separation of duties." 9 Okay. Do you happen to know as a -- you're 10 not an accountant; right? 11 12 Α. I am not. 13 Q. Do you know what that accounting term means, separation of duties? 14 15 Α. I have a general understanding that it means that the person that receives money is not the person 16 17 that records the receipt of the money and is not the person that signs off on the disbursement --18 19 Q. Okay. 20 -- of that money. I've been involved in Α. multiple organizations where we have a treasurer, and 21 those practices are very commonplace. 22 23 Okay. So it says here that there's a Q. 24 violation of separation of duties saying, "Ideally,

there should be one or a limited number of employees

245

who are authorized to process disbursements, separated by a person designated to make deposits."

And that sounds like probably a good accounting practice. You're not suggesting that because Gerald was not aware of this particular accounting practice that he was engaging in some wrongdoing just because of his lack of awareness?

- A. No, I'm not suggesting that.
- So let's go on and see what else they Q. Okay. They say, "The Child Welfare Services coordinator has discretionary spending authority over the GAL account." And they recite that the payments need to be made to Friends of Clayton County CASA in the care of the coordinator's name and "expenditures over \$500 must include two signatures, which may also include one of the CASA advisory board members." And then they recite that he "has two debit/credit cards imprinted with his name, one each for Friends of Clayton County CASA, Inc., and Friends of Clayton County CASA d/b/a Guardian Ad Litem accounts." Are you sure that he actually had two debit cards?
 - A. I only personally ever saw one.
- 24 Q. Okay.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

25 A. Yeah.

246

1 If he said he only had one, you wouldn't Q. 2 really take issue with that, would you? It's the only one I knew existed. 3 Α. Okay. All right. So they go on to say that 4 Q. 5 "there is very little oversight concerning the 6 day-to-day and weekly expenditures made from the 7 account." And they recommend -- their next 8 recommendation is "initiation of monthly reports which 9 list the details of the expenditures and how they align with the mission of funding volunteer recruitment, 10 training, and retention." 11 12 Okay. And it says, "Although the Child 13 Welfare Services coordinator serves as liaison between the CASA program and the courts, it's not best practice 14 for one person to have sole authority over court 15 ordered fees without any oversight." 16 17 Okay. So they're not saying he's done anything wrong here, but what they're saying is these 18 19 reports need to be more specific in what they say about 20 whether or not funds are being properly spent on recruitment -- volunteer recruitment, training, or 21 retention; right? 22 23 Α. Correct. 24 Q. Okay. So then it -- they do have a section captioned Guardian Ad Litem-Bank Statement 25

Transactions. And they talk about the total amount of administrative fees deposited in the GAL account from February 2011 to April 2011 is \$14,853.28. And the total amount of funds expensed during the same period is \$12,294.17. It sounds to me, reading that, they're not suggesting that more is being spent than is being taken in. It sounds like the opposite, right, that only funds that have been taken in are being spent?

A. Yes, that's what it would appear, yes.

Q. Okay. And then they do a breakdown of

Q. Okay. And then they do a breakdown of various categories of expenditures that have been made, and they say at the bottom, "The category of recruitment, training, and retention include various CASA-related lunch and dinner meetings at restaurants and bars. The following pie charts compare approximate percentages of these charges as related to meals, alcohol, and training."

Now, I find that an odd way to say that, and maybe I'm misunderstanding them or maybe it's a typo.

It says "the category of" -- "the following pie charts compare approximate percentages of these charges as related to meals, alcohol, and training."

Now, the purpose of the expenditure of the funds is supposed to be recruitment, training, and retention. So I find that breakdown, meals, alcohol,

248

and training, to be odd because, whether or not you like alcohol being purchased, the meals and alcohol could be part of a training expenditure or a retention expenditure or a recruiting expenditure. True?

- A. Potentially, depending on the context.
- Q. Okay. So I just found that the way that they say that to be odd. So they then have these pie charts, and it looks like they're showing three time frames, 2013, 2012, and 2011. And they're breaking down meals and entertainment, sponsorships, and alcoholic beverages, as well as professional association fees. It looks like in 2013 -- what is the Sponsorships (HSL)? What is that expenditure of funds? What is that for? I don't understand that. Do you know what that means?
- A. It is --

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

- 17 Q. This is money going out for sponsorships?
- A. That's what I assume. I think the HSL is -yeah, is referring to the Hot Atlanta Softball
 League -- or Hotlanta Softball League.
- Q. I'm not sure.
- A. Well, on the next page they use the, you
 know, initials HSL to refer to that. So I don't know.
 I'm assuming that's what they're --
 - Q. Okay. So they're saying 40 percent of funds

in 2013 were spent on the Hotlanta Softball League? Is that what that means? That doesn't sound right.

- A. That's what it appears to me, but I --
- Q. Okay.

- A. I didn't write the report, so I'm not sure.
- Q. All right. Meals and entertainment, and then 3 percent for alcohol. 2012, looks like nothing for alcohol, 2 percent for professional association fees, and then the rest, 98 percent, for meals and entertainment. And then in 2011, a hundred percent for meals and entertainment.

And they say, "Many of the audited receipts were for restaurants and bars, many of which were located outside the Clayton County area...Also, there was evidence of GAL funds being expensed on alcoholic beverages at restaurants, bars, and package stores."

And then they make a recommendation about there being checks and balances to prevent the misuse of funds and "strict guidelines regarding meals and entertainment should be initiated and enforced by any and all managing parties, especially disbursements concerning alcohol?"

So, to be clear, they're not saying that expenditures concerning alcohol are improper, but they are saying that there should be strict guidelines on

250

1 how and when funds are expended on such; right? 2 Α. I would take that, right. And then they seem to highlight that 3 Q. Okay. "the GAL bank statement...included a payment to Birch 4 5 Communications for monthly phone expenses at the CASA 6 office" and that this was a common expenditure and they 7 recommend that for office communication expenses that 8 they not be paid from the GAL account, that it doesn't 9 align with the mission of volunteer recruitment, training, and retention. 10 Do you know if Gerald was in charge of that 11 12 expenditure or if somebody else was? 13 Α. I don't -- I don't know. Okay. Was this a separate office separate 14 Q. 15 from -- a separate office separate from the courthouse, do you know? 16 17 Α. There was a separate office for a period of time when we were housed in the historic courthouse --18 or the annex behind the historic courthouse. 19 20 Q. Right. 21

- Α. Yeah, there was a separate --
- Q. A separate CASA office?
- 23 -- space, yes. Α.

22

24 Okay. And whether or not the phone Q. expenses, the phones, if you will, are being used for 25

251

1 recruitment, training, and retention, you don't know? 2 Α. I have no idea what they were. Okay. All right. But they --3 Q. I don't know why there were separate phones 4 Α. 5 in February -- well, oh, no, wait a minute. 6 February? Yeah. Never mind. 7 0. They're saying February 2012. 8 Α. No, I thought it was February 2013. 9 That would seem odd to me because we had moved into the new courthouse by then. 10 Okay. So was the CASA office in the 11 Q. 12 courthouse after you moved into the new courthouse? 13 Α. When we moved into the new courthouse, every -- we had space for everybody that worked in 14 CASA. What had happened at some point, the program had 15 grown to the point that we didn't have space and --16 17 Q. In the courthouse? 18 Right. And we were in the process of the 19 new courthouse being built, so --20 Q. Okay. -- they had to find some temporary space. 21 Α. If the board -- I'm sorry. If the phone 22 Q. 23 expenses were approved by the Friends of Clayton County 24 CASA board -- well, you don't know whether they were or

25

they weren't?

_	video Deposition
1	A. I don't.
2	Q. Okay.
3	A. I think the issue was that they were being
4	taken from the GAL fund and not being funded
5	Q. Okay.
6	A through the other account.
7	Q. But if that were the case and if Gerald was
8	reporting to the board and they authorized that, you
9	can't take issue with that; right?
10	A. I take issue with it being used being
11	paid from the GAL account, yes.
12	Q. Well, I understand you might. But you don't
13	know what the
14	A. I don't know what the board approved, no.
15	Q. And what the purpose of the phones was, for
16	that matter, whether the phones were used in
17	recruitment and training and whatnot. You don't really
18	know; right?
19	A. I don't know
20	Q. Or retention.
21	A why that was done, right.
22	Q. Okay. So let's go on. So it mentions, "On
23	the bank statement dated January 2013, a \$500 donation
24	for the ABC Christmas luncheon was deposited into the
25	GAL account."

253

1 Now, if it's the GAL account, would a 2 donation for a Christmas luncheon, should that go in the GAL account? 3 Α. In my opinion, that should go in the ABC 4 5 account. 6 Q. Okay. 7 Α. This was an ABC function, so --8 Q. Okay. 9 -- that confused me from the get-go. Α. But if somebody made a donation to Friends 10 Q. of Clayton County CASA for the GAL account, would it be 11 improper to deposit those funds in --12 13 Α. Well ---- a different account? 14 Q. -- people shouldn't be making donations to 15 Α. 16 the GAL account, period. That's not what that account 17 was set up for. But isn't the GAL account -- I think by your 18 Q. 19 testimony earlier, that is a 501(c)(3) account; right? 20 It's held in that, but that account was Α. supposed to be kept separate for only the court 21 generated fees. 22 23 Q. Okay. 24 Α. All the other funds that Friends of Clayton County CASA collected would go to their general 25

254

1 account. Where if it --2 Q. Okay. -- were like this, a donation for ABC, ABC 3 Α. had an account. It seems like it would have probably 4 5 been more appropriate there. Then it says, "the Child Welfare 6 Q. 7 Services coordinator wrote himself a reimbursement check for the same luncheon for \$428.41. There was no 8 9 documentation or receipts provided to support the reimbursement." 10 Okay. Do you know whether Gerald got 11 authorization from the board for reimbursement of that 12 13 sum of money for that expenditure? Have no idea. 14 Α. Okay. And do you know if one of the 15 Q. problems that they -- as they were going along that 16 17 they had was that he had to keep spending his own money on CASA-related matters and then getting reimbursement 18 19 and that that's why they finally issued him a debit 20 card? 21 Α. That may be. I don't have any personal 22 knowledge --23 And you're not --Q. 24 Α. -- of that.

25

0.

-- suggesting that if that had occurred that

255

1 there's anything improper in that, are you? 2 Α. I think writing yourself a check and signing it, that -- that's not best practice, for sure. 3 It may not be best practice, but if it's 4 Q. 5 approved by the board -- and I think, you know, we've 6 already talked about the board needed to approve these 7 things --8 Α. Well, as a court employee, one of our 9 policies states that you have the duty to avoid not only improper behavior but the appearance of 10 impropriety. And writing yourself a check from a 11 12 charitable checkbook, you know, organization's 13 checkbook, that's --14 I think you're --Q. Α. That crosses the line for me. 15 Well, it may cross the line for you. 16 Q. 17 you know what? There's not a darn thing in the MOU about it, and there's not a darn thing in the Friends 18 19 of Clayton County CASA bylaws about it. And he's a guy 20 who's spending his own money on CASA-related events and asking permission to basically get reimbursed. 21 I guess, but there's no documentation to --22 Α. 23 MR. HILL: Let him ask his question. 24 THE WITNESS: Okay.

256

1 BY MR. BUCKLEY: 2 Q. All right. But you guess, and that's the problem I have is you didn't investigate to see, for 3 example, whether or not that reimbursement was, in 4 5 fact, authorized, did you? Did you ask -- did you ask 6 the chair, the board chair in that meeting if --7 I didn't do the investigation. Okay. All right. Okay. 8 Q. And it said that 9 the "bank statement dated April 2013 included another check written by the Child Welfare Services coordinator 10 to himself in the amount of \$82.57 for reimbursement 11 12 for an AT&T sponsor dinner meeting." 13 Is that the AT&T employee sponsor that you're talking about? 14 Α. I don't -- I don't know for sure. 15

- Q. Did you know that Gerald was working with that guy to recruit AT&T employees as volunteers for Friends of Clayton County CASA?
- 19 A. I didn't know anything about that until --
 - Q. Okay.

20

- 21 A. -- I got this -- these -- you know, the 22 report and this stuff. I do believe I read that in --
 - Q. Okay.
- 24 A. -- his response.
- 25 Q. Okay. Do you know whether Gerald was ever

257

trained in generally accepted accounting principles? 1 2 Α. I don't know if he was or not. You don't know if he was trained -- if he 3 Q. has accounting training at all; right? 4 5 Α. I have no idea. And you're not trained in generally accepted 6 Q. accounting principles. 7 8 Α. Well, I've had lots of classes on budgeting 9 and finance and best practices and that --I get that. 10 Q. 11 Α. Yeah. You may have had the benefit of more 12 Q. 13 training than Gerald's had with that respect; right? 14 Perhaps. I don't know. Α. All right. But you're not specifically 15 Q. 16 trained on generally accepted accounting principles, 17 what they are and what they are not. I'm not an accountant. I've had entire 18 Α. 19 courses in financial management that do go through 20 I wouldn't consider myself an expert, no. there. And so when you're talking about, quote, 21 Q. crossing a line, for instance, as you just -- you're 22 23 talking about that based on the specialized training

that you have received and that he, in all likelihood,

24

25

has not received; right?

258

- A. Well, I found myself years and years ago the treasurer of my daughter's swim team, and this was before I was in court administration. And, you know, I knew that it would not be good to write myself a check on the team's checking account in a very similar situation that Mr. Bostock seems to have found himself where we're buying stuff, you know, on our own dime and having to wait for the reimbursement. I immediately set that up so that there were two signatories on that account, myself and the president of the club.
- 11 Q. Okay.

1

2

3

4

5

6

7

8

9

10

14

15

- A. And she would sign any reimbursements to me, not me.
 - Q. Well, I think that's terrific that you were a good steward to your daughter's swim team, but I don't --
- 17 A. Thank you.
- Q. -- know that that's necessarily the standard that we're talking about here. You don't know whether he was ever trained in generally accepted accounting principles.
- A. All I'm saying is it seems kind of common sense.
- Q. All right. So -- but the question is if he has check writing authority and if the board gives him

authority to write that check, regardless of whether you think it looks good, there's nothing morally wrong or illegal about him doing so.

- A. Well, you have bylaws that prescribe how payments are supposed to be handled.
 - Q. Right.

1

2

3

4

5

- 7 A. And I've never seen anything that says he 8 has that authority.
- Q. Did you see anything in the -- if he gets
 the authority from the board, then he has the
 authority.
- A. But where in writing is that authority?

 I've never seen that. That's what I'm saying.
- Q. Isn't that up to the board to make a record of that, not up to Gerald?
- A. It would be up to the board, but Gerald should be able to produce it.
- Q. Right. Well, if the board made that record; right?
- 20 A. If they made that record. And if they
 21 didn't make that record, then all we have to go on is
 22 the bylaws, which prescribe a different method.
- Q. Then part -- and, in fact, most of this
 audit, what most of this audit concluded was not that
 there was per se wrongdoing by Gerald but that controls

260

1 on the funds and how they were -- not only how they 2 were spent but how they were documented needed to be 3 tightened up; right? That was most of what this audit was about; right? 4 5 MR. HILL: Object to form, mischaracterizing 6 the evidence. 7 MR. BUCKLEY: That's not mischaracterizing 8 the evidence. This man just said he has common 9 sense. BY MR. BUCKLEY: 10 Most of this report was how they needed to 11 Q. 12 tighten up controls and they needed to have written 13 guidelines; right? I would say that's a part of the report. 14 Α. 15 Q. Okay. I don't know that I would say it was most. 16 Α. 17 I would say that there was much concern expressed about missing records, the reimbursements, how money was 18 19 spent, and the image that it portrayed or left open to 20 someone --21 Q. Okay. 22 Α. -- to assume. 23 And of course -- I'm on page 6 now. Are you Q. 24 there? 25 Yes, sir. Α.

261

1 Bottom half page 6, this is where Q. Okay. 2 they get into the Hotlanta Softball League. Okay. And it says, "The Child Welfare Services coordinator has 3 sponsored an adult softball team, of which he is a 4 5 member, using funds from the CASA GAL account. 6 softball team is part of the Hotlanta Softball League 7 out of the city of Atlanta. The coordinator stated he 8 had spoken to two advisory board members and received 9 authorization and support of this expenditure." 10 Do you have any reason to doubt that that is 11 true? 12 Α. No. 13 Q. Okay. And you're not here to call Gerald Bostock a liar today, are you? 14 No, sir. 15 Α. Okay. So it said, "According to the 16 Q. 17 coordinator, the purpose of the sponsorship is to raise awareness to the CASA program. Part of the expenses 18 19 incurred with this sponsorship included a reception 20 held in Birmingham, Alabama, that was paid for out of the GAL funds." 21 22 Now, did you -- you've made a lot about 23 that, the reception. And you know that the ball club 24 competed in a tournament that was in Birmingham, that the Hotlanta team that's from Atlanta went over to 25

262

1 Birmingham to compete in a larger tournament, in this 2 case softball league. You're generally aware of that; right? 3 That's what I understood happened, yes. 4 Α. Were you aware -- one second. Who is 5 Q. Okay. 6 Guy Alexander? 7 I know the name, but I'm not sure what his 8 association with this is. 9 Was he a board member that had an alcohol Q. distribution company, CASA board member? 10 I don't know. 11 Α. 12 Q. Okay. Were you aware that -- even if you're 13 not aware of what he did for a living, were you aware that Mr. Alexander was on the Friends of Clayton County 14 CASA board? 15 Like I said, the name sounds familiar. 16 Α. 17 know he's somehow associated with that, but I can't say for sure he was a --18 19 Were you aware --Q. 20 -- board member. Α. -- that he expressly authorized the 21 Q. expenditure for this party after the -- party for the 22 23 team after the tournament or during the tournament and 24 the payment of funds for food and drink for that event?

I don't know anything about all that.

25

Α.

Q. Okay. All right. So -- and they give an opinion here, the auditors. "In our opinion" -- "It is our opinion that sports league sponsorships do not fall within the current intentions of the GAL account. However, if the chief judges decide this type of expenditure is acceptable, details should be included in the MOU."

And then they recommend further that "any CASA-sponsored sports leagues be based in Clayton County" and "recommend the SOP require official written requests and authorization for all sponsorships and strict guidelines."

They express an opinion, Well, we don't think sports teams should be sponsored with CASA funds. But if the purpose of the sponsorship was recruitment of volunteers for the program, that at least would fall within the parameters of the original MOU, wouldn't it?

A. Yeah.

- Q. Okay. And Gerald actually I think in the questionnaire told you all that there were some people that were recruited as a result of that and I think that he was still trying to recruit. He let you know that; right?
- A. I believe there were three individuals he mentioned.

264

1 I don't know the specific number. Q. 2 were a number --Yeah. 3 Α. -- though anyway. Now, these volunteers, 4 Q. 5 and especially the guardian ad litems, there's a lot of 6 man and woman hours that go into -- they're volunteer 7 hours but are in the Guardian Ad Litem program; right? 8 Α. There can be, yes, depending --9 Probably what? Q. -- on the case. 10 Α. 11 Q. How many do you think a year? Any idea at 12 all? 13 Α. Per volunteer? No, all together for the court. 14 Q. Well, I know last fiscal year, even with the 15 Α. pandemic, there were over 1,200 hours. 16 17 Q. Okay. 1,200 hours. Spread across all of our volunteers. 18 Α.

- Q. Okay. And if you were to pay those folks by
 the hour to do the work that they were doing, let's say
 \$25 an hour, that would far exceed the Friends of
 Clayton County CASA budget bank account, whatever --
 - A. Absolutely, yeah.

23

Q. Yeah. And these are people that are trained in a very specialized and sensitive area; right?

video Deposition

265

A. They are, yeah.

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

21

- Q. You've got to -- you know, representing these kids is a very sensitive and refined job. And so the funds spent on recruiting can be well spent funds that if you were to pay these folks, I mean, you're getting more bang for your buck by recruiting volunteers than by hiring staff and paying people to do this job; right?
- A. Well, right. And that's how the program's structured expressly for -- there's no CASA program -- we're actually having paid staff on the CASA program within the court is an oddity in this state. Most programs are just nonprofits.
- Q. Okay. And when -- we can get into, you know, your differences of opinion on should these funds have been spent this way or not. But overall, under Gerald's stewardship, the GAL program was a success.
- A. Yeah, we met the need of the superior court.
- Q. It was one of the largest programs in the state, if not the largest, wasn't it, of its kind?
 - A. The CASA program?
 - Q. Yes.
- 23 A. Oh, yeah. Yes.
- Q. In fact, it's one of the larger programs in the country, of its kind?

266

1 It was, yes. Α. 2 Q. Okay. And I'm not saying that size is a determination of success, but it worked well. Children 3 were well represented by these guardian ad litems, 4 generally speaking; is that fair? 5 6 Generally speaking, yes, sir. 7 ο. And these guardian ad litems were 8 well trained and performed their jobs, probably with a 9 few exceptions, but for the most part performed their jobs well. 10 I mean, we had an occasional one we 11 Α. Yeah. would have to dismiss, but --12 13 Q. Right. -- yes. No, the judges were always very 14 Α. happy with --15 When you have a lot of people doing a job, 16 Q. 17 you're occasionally going to have --18 Α. Sure. 19 -- an outlier; right? Q. 20 Α. Sure. Okay. But on the whole, generally speaking, 21 Q. it was a successful --22 23 Yeah, it was. Α. 24 -- program, and it was performed well by Q.

these volunteers.

A. Yeah.

Q. That fell under Gerald's stewardship.

A. Sure.

- Q. Okay. So, in any event, concluding this report, they have a conclusion, a little short conclusion. And they do not, in their conclusion, find wrongdoing by Gerald, do they?
 - A. Not directly, no.
- Q. Okay. What they say is, "The accounting controls concerning the CASA program funds are relatively nonexistent, lack structure, and leave room for inconsistencies surrounding the cash reporting and documentation process. Lack of oversight to these accounts, particularly the Guardian Ad Litem account, will increase risk and could result in loss of credibility to a program that has an outstanding reputation across Clayton County and the state."

That was their conclusion; right? No word about Gerald Bostock or he stole money or he improperly spent funds or anything of that kind. That's not what they say in here; right?

- A. That's not what they say.
- Q. Okay. So you were not involved in contacting Richard Belcher on the day that Gerald's termination was announced or getting him down to the

268

1 courthouse or anything of that nature? 2 Α. No, sir. Okay. And you don't know who contacted him 3 Q. or whether he contacted you all? You don't know? 4 5 Α. I have no knowledge of it. 6 Okay. Are you on social media? Q. 7 Α. Am I on social media? 8 Q. Yep. 9 I have social media accounts that I don't do Α. anything -- haven't done anything with in over two 10 11 years, maybe longer. What are your social media accounts? 12 Q. 13 Α. I have Facebook and Instagram, LinkedIn. That's all. 14 15 Facebook, Instagram, LinkedIn. So you post Q. 16 comments about whatever you want to on these -- or you 17 did. I have in the past. I haven't posted 18 19 anything other than maybe an occasional vacation 20 picture or something in the last couple of years. Okay. Will you agree with me that after 21 Q. this deposition you will not make any changes or any 22

A. Sure.

deletions in any of those accounts?

23

24

25

MR. BUCKLEY: Okay. All right. Let's take

269

1 a little break. I'm deeply saddened to say we may 2 be close to being done here today. THE WITNESS: Okay. 3 THE VIDEOGRAPHER: We're off the record. 4 5 (VIDEO CAMERA OFF.) (A brief recess was taken.) 6 7 (VIDEO CAMERA ON.) 8 THE VIDEOGRAPHER: We're back on the record. 9 MR. BUCKLEY: You ready? 10 MR. HILL: We're ready. BY MR. BUCKLEY: 11 12 Q. All right. Mr. Slay, we've taken a couple 13 of breaks. Is there any testimony you've given so far today that you need to correct or clarify? 14 Not that I can think of, no, sir. 15 Α. Okay. And you understand you've been under 16 Q. 17 oath the entire day? 18 Α. Yes, sir. 19 All right. Now, I have a couple more Q. 20 questions. I want to draw your attention back to Exhibit 10, which you have in front of you. Go to page 21 5 of that document, please. Do you see the pie chart 22 23 there? Yes, sir. 24 Α. 25 You're looking at that? Q.

270

1 Α. The three, yeah. 2 Q. Yeah. And you see the pie chart on the top left-hand side for 2013 recruitment, training, and 3 retention; right? 4 5 Yes, sir. Α. It shows 40 percent Sponsorships (HSL). 6 Q. 7 you see that? 8 Α. Yes, sir. 9 Do you know that that 40 percent there --0. now, this is in -- this would have been -- this report 10 was generated in May of 2013; right? 11 12 Α. Right. 13 Q. So this is not for a full year of expenditures; right? 14 15 Α. Right. 16 It's only for a portion of the year. Q. 17 Α. Yeah. Do you understand that this 40 percent that 18 0. 19 they are putting on the Hotlanta Softball League 20 sponsorship represents only \$250? I don't know what the cost of the 21 Α. 22 sponsorship was. 23 Q. If I told you to assume for the sake Okay. 24 of your answer that that only represents \$250, you have

no reason to dispute that as you sit here today.

271

Α. No, sir.

1

6

16

17

18

19

- 2 Q. Okay. And the entire pie chart actually represents less than a thousand dollars in 3 expenditures. If I told you that, you have no reason 4 5 to dispute that either; right?
 - Less than a thousand? Α.
- 7 ο. Right, less than a thousand.
- 8 Α. Well, according to the chart on the page 9 before, it's \$1,026.22.
- 1,026.22. 10 Q. Okay.
- If that's -- if I'm reading that correctly. 11 Α.
- 12 Q. Okay. So are you aware now that the CASA 13 logo, Clayton County CASA logo, was on the team jerseys and also that there was a banner that was displayed at 14 the ball field for Clayton County CASA? 15
 - I believe that's what Mr. Bostock said. Α.
 - Q. Right. And that -- and he did say his purpose was to promote the program and to promote recruiting and commitments for the program.
 - That's what he said, yes. Α.
- Okay. And did he tell you or did you ever 21 Q. hear that he had obtained through that program \$3,000 22 in commitments for the Duck Derby? 23
- 24 Α. I believe I remember reading something to that effect in his response, but --25

1	
1	Q. Okay.
2	A other than that, no.
3	Q. And with respect to the display of the logo
4	on the banner and on the shirts, are you aware that the
5	people who attended these games, there was 1- to 2,000
6	people who actually saw the logo and saw the banner?
7	A. If you say so. I don't know how many people
8	attended.
9	MR. BUCKLEY: All right. Good. All right.
10	That is all the questions I have of this witness.
11	THE WITNESS: Okay.
12	MR. HILL: We do not have any questions.
13	MR. BUCKLEY: All right. Good. All right.
14	We'll be seeing you all again soon.
15	THE VIDEOGRAPHER: 5:59 p.m., we're off the
16	record.
17	(VIDEO CAMERA OFF.)
18	MR. HILL: We'll do the read and sign, which
19	means, when the transcript comes out, I'll send
20	you the copy. You read it, make sure everything
21	is correct and accurately reflects your testimony.
22	THE WITNESS: Okay. All right.
23	(Deposition concluded at 6:02 p.m.)
24	
25	

1	ERRATA SHEET
2	
3	Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or O.C.G.A. 9-11-30(e), any changes
4	in form or substance which you desire to make to your deposition testimony shall be entered upon the
5	deposition with a statement of the reasons given for making them.
7	To assist you in making any such corrections, please use the form below. If supplemental or additional pages are necessary, please furnish same and attach them to this errata sheet.
9	
LO	
L1	I, the undersigned, COLIN SLAY, hereby
L2	certify that I have read the foregoing deposition and that said transcript is true and accurate, with the
L3	exception of the following changes noted below, if any:
L 4	
L5	Page/Line/Should Read:
L6	
L7	Reason:
L8	
L9	Page/Line/Should Read:
20	
21	Reason:
22	
23	Page/Line/Should Read:
24	·
25	Reason:

Video Deposition

1	Page/Line/Should Read:
2	
3	Reason:
4	
5	Page/Line/Should Read:
6	
7	Reason:
8	
9	Page/Line/Should Read:
10	
11	Reason:
12	
13	Page/Line/Should Read:
14	
15	Reason:
16	
17	Page/Line/Should Read:
18	
19	Reason:
20	
21	COLIN SLAY,
22	Sworn to and subscribed before me,
23	, Notary Public.
24	This day of 2021.
25	My Commission Expires:

Regency-Brentano, Inc.

```
1
                     CERTIFICATE
 2
    STATE OF GEORGIA:
 3
    PAULDING COUNTY:
 4
 5
 6
               I hereby certify that the foregoing
 7
         transcript was taken down, as stated in the
 8
         caption, and the questions and answers thereto
 9
         were reduced to the written page under my
         direction and that the foregoing pages 1
10
         through 274 represent a true and correct
11
12
         transcript of the evidence given.
13
               I further certify that I am not of kin
         or counsel to the parties in the case, am not
14
15
         in the regular employ of counsel for any of
16
         said parties, nor am I anywise interested in
         the result of said case. The witness did
17
         reserve the right to read and sign the
18
19
         transcript.
20
               This, the 4th day of October 2021.
21
22
23
24
                     CYNTHIA B. GATEWOOD, CCR-B-1400
25
```

1	DISCLOSURE
2	STATE OF GEORGIA: COUNTY OF PAULDING:
3	Deposition of COLIN SLAY
4	Populario de Policia de Policia de Policia de P
5 6	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:
	disclosure:
7 8	I am a Georgia Certified Court Reporter. I am here as a representative of Regency-Brentano, Inc.
9	I am not disqualified for a relationship of interest under the provisions of O.C.G.A. §9-11-28©.
10	
11	Regency-Brentano, Inc., was contacted by the
12	offices of Buckley Beal LLP to provide court reporting services for this deposition.
13	
14	Regency-Brentano, Inc., will not be taking this deposition under any contract that is prohibited by O.C.G.A. §15-14-37 (a) and (b).
15	
16	Regency-Brentano, Inc., has no exclusive contract to provide reporting services with any party
17	to the case, any counsel in the case, or any reporter
18	or reporting agency from whom a referral might have been made to cover this deposition.
19	
20	Regency-Brentano, Inc., will charge its usual and customary rates to all parties in the case, and a financial discount will not be given to any party to
21	this litigation.
22	
23	Cynthia Batewood
24	
25	CYNTHIA B. GATEWOOD, CCR-B-1400 Date: October 4, 2021

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 278 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County			I	
	05 10 00 2 01 15	(2)	1 (1)	10 16 45 11 00 6
	87:18;88:3;91:15;	accuse (3)	adequate (1)	10:16;45:11;80:6;
\$	170:15;240:9;263:6	167:19,20,22	107:20	104:20,21,22;112:19;
Ψ	accepted (14)	accused (3)	administration (5)	150:6;183:4;184:2;
	24:4,6;25:3;38:1;	69:22;163:19,25	85:8;91:23;219:21;	201:12;258:1
\$1,026.22 (1)				
271:9	72:21,23;91:22;	acronym (2)	241:6;258:3	agree (6)
\$12,294.17 (1)	139:18;170:16,18;	53:12;56:6	administrative (15)	66:10;74:9;130:8;
	257:1,6,16;258:20	across (2)	17:20;18:15;61:2;	165:20;236:9;268:21
247:5				
\$14,853.28 (1)	access (4)	264:18;267:17	72:10,11,13,15;73:7;	agreeable (1)
247:3	119:24;140:5;	act (1)	147:1;149:15;169:25;	6:14
	218:18;237:24	40:18	170:7;239:17,19;	agreed (5)
\$200 (2)	accord (1)	action (6)	247:2	34:7;127:24;
153:18,24				
\$25 (1)	218:19	40:10;83:13;	administrator (9)	129:15;139:12;
264:21	accordance (3)	109:11;137:14;	58:20;59:5;78:25;	203:14
	117:9;141:14;	145:22;159:21	79:9,13;81:9;143:11;	agreement (3)
\$250 (3)	238:22	actions (2)	222:8;225:1	22:9,10;176:1
24:18;270:20,24			*	
\$3,000 (1)	according (6)	103:18;129:4	admit (1)	ahead (12)
271:22	127:20;153:17,25;	activities (6)	231:14	16:2;17:10;28:15;
	187:14;261:16;271:8	26:13;32:6;33:4;	adult (1)	32:11;40:15;122:13;
\$428.41 (1)	accordingly (1)	35:3;135:5;171:3	261:4	138:17;171:24;
254:8	0 . ,			
\$500 (18)	40:18	activity (6)	advance (3)	207:14,16;216:18;
23:11,15;32:5;33:7;	account (62)	114:7;124:12;	135:1,3;173:9	243:6
	16:11;19:13;30:19;	132:24;165:3;223:5;	advances (1)	ahold (1)
72:11,13;126:3;	31:2;32:2,7,12,13,14,	244:8	212:5	11:19
170:7;172:13;176:7;				
188:19;222:22;	17,18;33:3,7,12,18;	acts (1)	adverse (2)	AI (2)
234:10;239:17;240:1;	34:11,14;64:5;95:17;	88:8	109:11;145:22	56:4,5
	117:14;127:15,16;	actual (4)	advertising (1)	AJC (2)
243:14;245:15;	135:12,18;145:18;	13:5;104:22;183:7;	133:7	217:11;219:1
252:23				
\$82.57 (1)	148:23;195:7;222:14;	191:10	advise (1)	Alabama (6)
256:11	223:4;234:20,21,24;	actually (41)	143:12	50:10,23;135:14,
230.11	235:3,4;237:17;	11:13;19:4;47:7;	advised (1)	15;136:20;261:20
		52:2;54:16;55:15;	200:19	albeit (1)
\mathbf{A}	239:16,17;245:12;			
	246:7;247:2;250:8;	56:10;70:4;81:16;	Advisory (6)	117:15
ABC (7)	252:6,11,25;253:1,3,	89:4;91:19;95:10;	17:19;73:6;149:14;	alcohol (36)
	5,11,14,16,16,18,19,	105:11;106:24;107:2,	225:5;245:16;261:8	20:9,19;21:4,12,16,
31:10;185:6;	20;254:1,4;258:5,10;	7;109:14,16;111:19;	affiliated (1)	22;26:18,22;30:7,9,
252:24;253:4,7;				
254:3,3	261:5;263:4;264:22;	114:24;116:11;128:6,	192:21	12,15;34:23;35:4;
abilities (1)	267:14	7;146:3;162:22;	affirmative (6)	74:15;119:5;124:23;
	accountant (2)	177:17;180:11;	16:15;24:21;119:9;	125:6,8;135:13;
88:2	244:11;257:18	181:23;184:18;	136:5;161:8;208:4	175:7,9,11,12,16;
ability (7)	,			
87:8,16,17;88:7;	accounted (2)	194:19;195:15;196:3;	affirmatively (1)	232:20;247:17,22,25;
91:14,19;237:24	170:23;179:13	212:8;233:22;238:14;	59:6	248:2,2;249:7,8,22,
	accounting (16)	240:23;245:21;	aftermath (1)	24;262:9
able (5)	16:9;137:13;	263:19;265:11;271:2;	7:24	alcoholic (3)
9:9;29:16;88:16;				
231:14;259:17	138:25;139:15,18;	272:6	afternoon (1)	133:24;248:11;
abode (1)	193:13;235:1;244:13;	ad (32)	147:5	249:15
11:16	245:4,6;257:1,4,7,16;	23:10,25;24:11,12;	afterward (2)	Alexander (2)
	258:20;267:9	28:3;29:6,9,12;32:21,	110:10;185:1	262:6,14
above (1)	accounts (16)	25;33:3,4;72:17;	afterwards (3)	align (2)
87:17				0 , ,
above-average (1)	12:23;30:22;96:17,	74:20;75:7,16,21;	13:11;148:8;236:16	246:9;250:9
94:6	19,20;122:19;194:6;	76:1;114:19;164:21;	Again (17)	aligned (1)
	195:9,15;239:8,12;	170:12;174:6;182:11;	9:20;23:21;25:16;	184:15
abrogate (1)	245:20;267:14;268:9,	195:10;239:16;	105:12;113:17;	allegation (1)
140:13				
absence (2)	12,23	245:20;246:25;264:5,	124:23;130:17;	163:20
189:25;190:4	accurate (1)	7;266:4,7;267:14	139:11;146:7;148:22;	allegations (3)
	6:21	add (3)	170:6;175:21;179:1;	120:19,20;121:1
absolutely (12)	accurately (1)	8:22;12:25;63:7	203:16;219:10;	alleged (4)
21:11;22:15;29:17;				
68:8;87:25;112:23;	272:21	addition (1)	225:13;272:14	191:14;192:2;
113:5;129:1,25;	accusation (4)	223:18	against (5)	193:3;197:11
	95:16,19;131:2;	address (2)	114:7;145:22;	Allen (5)
130:9;141:18;264:23				
accept (2)	159:25	47:4;49:6	161:3;207:6,11	39:10;195:4;
25:11;201:8	accusations (4)	addressed (5)	age (1)	198:11;204:17;
acceptable (9)	67:7;120:9;161:3;	81:7,14,16,17;	48:1	207:21
	237:23	194:19	ago (12)	alleviate (1)
24:3;36:5;72:20;	257.25	17.1.17		
-				

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 279 of 362
Bostock v. Video Deposition
Clayton County Septem Colin Slay September 10, 2021

Clayton County				September 10, 2021
148:15	174:10;201:12	177:8;251:23;252:14;	assumption (1)	auditor (3)
alleviated (1)	answered (1)	255:5	242:11	13:5;143:22;238:2
148:18	222:7	approves (2)	AT&T (4)	auditors (11)
allow (1)	anticipate (1)	172:23;234:18	125:3;256:12,13,17	12:23;13:3;19:17;
175:16	34:4	approving (3)	ate (1)	121:7,12,20,21;
allowed (1)	anti-ethical (1)	19:14;89:5,6	133:13	173:23;196:11,18;
165:24	11:16	approximate (2)	Atlanta (23)	263:2
allowing (2)	anymore (1)	247:15,21	11:25;37:18,19;	audits (3)
29:2;54:10	105:10	April (4)	38:1;48:7,24;49:3,10,	96:10,16;121:4
alluded (10)	apart (2)	93:12;121:13;	19;50:7,16,21;52:9,	August (2)
101:8;158:16,19;	77:23;110:23	247:3;256:9	12;74:19;113:22;	168:15;224:23
160:3,13;162:15;	apologize (1)	area (6)	133:23;174:16;217:6;	aunt (3)
163:7,11,15;164:3	33:21	48:7;49:14;57:11;	218:18;248:19;261:7,	49:12,18,24
alluding (1)	apparently (3)	89:17;229:13;264:25	25	aunts (3)
163:24	140:25;173:20;	areaAlso (1)	attached (2)	48:11;49:10,13
almost (1)	204:3	249:14	200:4;215:20	auspices (1)
100:4	appear (2)	areas (2)	attachments (1)	177:3
along (5)	198:6;247:9	74:13;87:7	238:10	author (1)
66:4;93:1;197:19;	appearance (2)	argue (2)	attempt (2)	199:18
236:11;254:16	242:14;255:10	102:22;169:8	37:11;45:18	authority (32)
Alternatives (3)	appeared (3)	around (12)	attend (1)	16:8;20:3;28:23;
53:10,13;56:7	29:20;122:25;	26:13;36:8;37:15;	53:25	35:11;79:10,21;
although (2)	231:18	53:8,18,23;57:9;66:9;	attendance (1)	81:12;119:11,13,18,
66:14;246:12	appearing (1)	67:2;70:7,21;123:2	92:6	24;120:17;122:18;
always (10)	231:24	arrest (1)	attended (3)	125:19,21;127:4;
66:5,10,11,13,19;	appears (11)	107:17	232:17;272:5,8	128:15,18;129:7,8,16;
68:6;202:4;210:4;	86:13;87:24;	article (5)	attending (1)	130:5,18;135:10;
236:10;266:14	106:12;120:6;131:1;	217:6,11;218:6,12,	230:2	245:11;246:15;
Ambassadors (6)	140:3;200:16;205:19;	25	attention (2)	258:25;259:1,8,10,11,
31:3,9,12;191:4;	213:8,13;249:3	articles (1)	222:5;269:20	12
195:11;198:18	application (1)	221:14	attorney (2)	authorization (6)
amended (2)	198:17	aspect (1)	22:17;200:17	138:4,6;140:4;
18:8,13	Applied (4)	65:5	attorneys (2)	254:12;261:9;263:11
among (4)	51:23,24;52:6;	aspects (1)	7:6;224:9	authorized (5)
91:21;198:4;	53:22	65:6	attorneys' (1)	125:24;245:1;
240:25;241:9	apply (2)	assessor (1)	25:4	252:8;256:5;262:21
amount (6)	54:3,4	185:4	attorney's (4)	available (2)
63:4;197:8;235:11;	appoint (1)	assigned (3)	24:5;72:22;170:17;	196:11;199:3
247:1,4;256:11	28:3	12:7;107:9;114:18	200:3	average (3)
analogy (1)	appointed (2)	assist (1)	audit (75)	87:18;91:14;94:9
26:21	13:20;115:1	76:10	12:23;13:7;15:16,	avoid (1)
ancillary (1)	appraisal (2)	assistance (4)	17;16:4;62:14,15,22;	255:9
31:3	86:14;87:20	10:21;209:12,16;	63:20;64:2,3;85:1,3,4,	aware (25)
Android (11)	appreciation (1)	210:22	6;96:9,10,12,15;	13:12;40:23;75:3;
41:22,25;42:21;	20:25	assistant (4)	101:14,18,20;103:4;	76:16;79:19;101:22;
44:5,8,24;45:17,18,	approach (1)	81:10;181:18;	111:13;113:12,13,23;	103:15;108:16;
23;46:7,9	236:9	184:18;213:22	121:3,6,15;122:18;	118:22;145:21;151:1;
Androids (1)	approaches (1)	associated (3)	127:23,23,24;128:1;	222:11;223:2;232:6;
45:21	77:17	117:8;239:14;	131:1,9,15,18;132:3;	240:23;242:23;245:5;
Angel (2)	appropriate (4)	262:17	138:18;143:13,23,25;	262:2,5,12,13,13,19;
157:5;160:18	18:1;74:14,14;	association (3)	144:7,9,17,17,21;	271:12;272:4
Annell (4)	254:5	248:12;249:8;262:8	145:21;152:1,6,11;	awareness (2)
157:7;182:17,19;	appropriately (1)	assume (15)	167:25;168:23;169:1,	245:7;261:18
186:10	119:20	6:15;25:14,22;	14;196:10;197:23;	away (2)
Annex (3)	approval (3)	28:22;43:17;46:19;	214:22;215:18,19;	11:2;82:24
	125:11;126:20;	55:18;89:9;114:1;	216:6;226:6;227:18,	
17:4;73:2;250:19		1 42 14 100 22	19;236:20;237:9;	В
17:4;73:2;250:19 Annie (5)	173:9	143:14;189:23;		
17:4;73:2;250:19 Annie (5) 51:22,25;209:14;	173:9 approve (4)	198:11;248:18;	238:4,10,17;239:15;	
17:4;73:2;250:19 Annie (5) 51:22,25;209:14; 210:16,19	173:9 approve (4) 156:25;157:23;	198:11;248:18; 260:22;270:23	238:4,10,17;239:15; 259:24,24;260:3	bachelor (1)
17:4;73:2;250:19 Annie (5) 51:22,25;209:14; 210:16,19 announced (3)	173:9 approve (4) 156:25;157:23; 158:12;255:6	198:11;248:18; 260:22;270:23 assumed (1)	238:4,10,17;239:15; 259:24,24;260:3 audited (1)	51:16
17:4;73:2;250:19 Annie (5) 51:22,25;209:14; 210:16,19 announced (3) 12:12;13:10;267:25	173:9 approve (4) 156:25;157:23; 158:12;255:6 approved (10)	198:11;248:18; 260:22;270:23 assumed (1) 194:20	238:4,10,17;239:15; 259:24,24;260:3 audited (1) 249:12	51:16 bachelor's (2)
17:4;73:2;250:19 Annie (5) 51:22,25;209:14; 210:16,19 announced (3)	173:9 approve (4) 156:25;157:23; 158:12;255:6	198:11;248:18; 260:22;270:23 assumed (1)	238:4,10,17;239:15; 259:24,24;260:3 audited (1)	51:16

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 280 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

				September 10, 2021
9:4;12:21;23:11,22;	based (7)	123:7;124:14;	Board (90)	20;199:1;202:15;
26:17;47:1;71:20;	53:18;62:14,19;	131:12,25	17:20;26:1,3,6,8,11,	204:22,25;205:1,22,
83:10;86:21,22,23;	161:2,7;257:23;263:9	benefiting (2)	15;27:6;35:9,16;36:5,	25;213:18;214:21;
89:16,20,24;100:25;	basically (20)	133:5;173:14	6;73:6;92:11;110:21;	215:18;216:7;217:3,
103:13;104:23;114:6,	10:21;35:14;53:12;	benefits (1)	111:7;125:12,23;	15;221:23;224:14;
10;122:4;124:7;	54:6,23;70:7;78:22;	171:18	126:18,19;127:7;	241:25;258:6;261:14;
128:11;135:20;	87:1;97:1;98:2;	benefitting (1)	129:6;131:14;132:1,	267:19;271:16
137:21;142:12,14;	107:22;125:22;	123:12	10;134:9,13,21;	Bostock's (21)
145:10,11,13;146:18,	132:23;168:15;170:7;	besides (2)	135:3;137:24;138:8;	7:23;8:8;9:3,18;
23;147:7;159:4,13;	183:4;214:5;217:15;	94:22;98:23	139:8,17,21,22;	13:9;18:14;62:8;
160:1;175:24;178:4;	230:7;255:21	best (11)	140:10;141:20,22;	64:21;74:18;78:5;
183:1;185:11;188:10;	basing (3)	7:3;10:1;14:20;	145:19,19;149:15;	106:22;125:19;
206:10;214:18;269:8,	27:11,13;242:9	28:15;65:22;204:7;	151:7;155:12;156:20,	132:15;136:10;
20	basis (5)	209:13;246:14;255:3,	24;157:2;158:11;	151:10;152:18;
background (3)	117:15;196:16,16;	4;257:9	161:2,18;184:4,11,12,	153:17;159:15;
47:2;117:21;239:1	237:19,20	better (1)	16;185:5;191:1,3,10;	181:18;200:9;216:16
backing (1)	Bates (9)	28:13	192:14,22;197:3,5,6;	both (7)
12:8	72:1;86:12,22;88:6;	beverages (3)	201:24;203:10,18;	63:1,13;88:8;149:2;
Badgers (5)	90:10;106:11;170:2;	133:24;248:11;	205:6;211:4;225:5;	162:15;175:15;
75:3;124:6;126:13;	198:4;216:14	249:16	237:1;242:16,16; 245:16;251:22,24;	181:16
136:13,18 Baker (4)	became (1) 118:22	beyond (2) 125:14;238:11	245:16;251:22,24; 252:8,14;254:12;	bottom (4) 199:25;216:23;
207:21;214:3,4,6	Becky (2)	big (1)	252:8,14;254:12; 255:5,6;256:6;	247:12;261:1
balances (1)	180:23;185:25	201:16	258:25;259:10,14,16,	box (1)
249:18	becomes (2)	Bill (2)	18;261:8;262:9,10,15,	108:11
ball (2)	124:17;171:8	38:20;39:1	20	boxing (1)
261:23;271:15	Bedell (3)	binder (2)	book (1)	195:6
Baltimore (3)	185:2;191:12;	200:19,20	129:4	brain (1)
52:10,12,13	192:14	Birch (1)	books (2)	225:3
bang (1)	beer (1)	250:4	130:11;195:7	brand (1)
265:6	21:6	Birmingham (6)	born (2)	133:16
bank (31)	begin (1)	135:14;136:4,6;	51:4,5	break (7)
92:13;94:22;98:11,	195:5	261:20,24;262:1	boss (3)	71:9;142:3,5,18;
13;102:16;117:14;	hoginning (1)	hicewite (1)	63.7.716.0.710.14	
	beginning (1)	biscuits (1)	63:2;216:9;219:14	143:4;214:13;269:1
118:12;120:14;122:1,	237:12	188:5	bosses (1)	breakdown (2)
118:12;120:14;122:1, 19;129:11;130:3,20,	237:12 behavior (3)	188:5 bit (11)	bosses (1) 63:5	breakdown (2) 247:10,25
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19;	237:12 behavior (3) 36:5;230:10;255:10	188:5 bit (11) 7:10;41:10;47:2;	bosses (1) 63:5 Bostock (119)	breakdown (2) 247:10,25 breaking (1)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20;	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14;	breakdown (2) 247:10,25 breaking (1) 248:9
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22;	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8;	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9;	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11;	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37)	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8;	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20;
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16,	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6,	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21,	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5,	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15,	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12)	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20;	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15,	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7)	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18 bars (8)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24 beneath (1)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7) 82:13;83:25;84:6,	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25; 123:7,22;128:1;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17 brother-in-law (2)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18 bars (8) 132:14;163:8;	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24 beneath (1) 89:1	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7) 82:13;83:25;84:6, 14;96:9;97:16;98:2	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17 brother-in-law (2) 49:5,7
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18 bars (8)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24 beneath (1)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7) 82:13;83:25;84:6,	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25; 123:7,22;128:1; 129:16,20;131:11,24;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17 brother-in-law (2)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18 bars (8) 132:14;163:8; 226:3;227:17,22; 247:15;249:13,16 base (1)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24 beneath (1) 89:1 Benefield (1) 143:12 benefit (4)	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7) 82:13;83:25;84:6, 14;96:9;97:16;98:2 blamed (2)	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25; 123:7,22;128:1; 129:16,20;131:11,24; 134:5,11,22;137:1,6,	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17 brother-in-law (2) 49:5,7 brought (5)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18 bars (8) 132:14;163:8; 226:3;227:17,22; 247:15;249:13,16 base (1) 27:15	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24 beneath (1) 89:1 Benefield (1) 143:12 benefit (4) 122:25;124:10;	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7) 82:13;83:25;84:6, 14;96:9;97:16;98:2 blamed (2) 84:22,23 blank (1) 163:19	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25; 123:7,22;128:1; 129:16,20;131:11,24; 134:5,11,22;137:1,6, 8;144:1,2;145:12,14, 22;146:13,25;147:14, 22;149:1;150:3,11;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17 brother-in-law (2) 49:5,7 brought (5) 111:13;186:23; 187:12,18;188:10 buck (1)
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18 bars (8) 132:14;163:8; 226:3;227:17,22; 247:15;249:13,16 base (1) 27:15 baseball (1)	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24 beneath (1) 89:1 Benefield (1) 143:12 benefit (4) 122:25;124:10; 201:6;257:12	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7) 82:13;83:25;84:6, 14;96:9;97:16;98:2 blamed (2) 84:22,23 blank (1) 163:19 blatantly (1)	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25; 123:7,22;128:1; 129:16,20;131:11,24; 134:5,11,22;137:1,6, 8;144:1,2;145:12,14, 22;146:13,25;147:14, 22;149:1;150:3,11; 156:22;158:9;160:25;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17 brother-in-law (2) 49:5,7 brought (5) 111:13;186:23; 187:12,18;188:10 buck (1) 265:6
118:12;120:14;122:1, 19;129:11;130:3,20, 25;195:7,9,15,19; 196:2,4;202:20; 203:1,5;207:22; 222:13;223:4;239:8; 250:4;252:23;256:9; 264:22 Banke (3) 73:24;74:1,2 banner (3) 271:14;272:4,6 bar (7) 111:11,17;113:21, 24;114:3;233:4,5 barely (1) 38:14 barred (3) 105:25;106:1,2 barring (1) 105:18 bars (8) 132:14;163:8; 226:3;227:17,22; 247:15;249:13,16 base (1) 27:15	237:12 behavior (3) 36:5;230:10;255:10 behavioral (1) 53:16 Behind (4) 31:3;195:11; 198:18;250:19 belabor (1) 185:13 Belcher (3) 110:11;230:20; 267:24 believing (1) 135:15 belong (1) 166:5 belonged (2) 128:3;239:9 belongs (3) 119:7;128:14,24 beneath (1) 89:1 Benefield (1) 143:12 benefit (4) 122:25;124:10;	188:5 bit (11) 7:10;41:10;47:2; 50:25;55:19;58:1; 62:16;69:18;77:22; 90:12;95:24 Black (37) 69:5,7,11;70:9; 77:22,24;78:7,12,16, 19;79:11,21;80:13, 17;82:7,18,19;83:17; 84:6,12,22;95:11,13; 97:1,1,11;98:6; 118:23;119:2,17; 120:19;185:8,17; 236:12,12,13;237:19 Blackberry (12) 41:21,25;42:8,20; 44:5,25;45:4,12,15, 21,21;46:8 Black's (7) 82:13;83:25;84:6, 14;96:9;97:16;98:2 blamed (2) 84:22,23 blank (1) 163:19	bosses (1) 63:5 Bostock (119) 5:14;7:19;9:14; 10:5;12:12;13:19,24; 14:12;17:2,16;18:6; 23:18;24:8;26:2,11; 39:13;40:2;41:15; 43:12,21;57:24; 60:18;61:24;62:5; 65:3;66:6;67:13; 68:18;69:19,22;70:6, 20;72:25;74:2;75:9; 78:22;82:18,18;83:5, 9,12,24;84:5,11,15, 22;86:14;88:7;90:9; 91:20;92:4,8;106:17; 110:22;115:25; 116:12,23;117:13,14; 118:16;119:1,6,23; 121:13,17;122:25; 123:7,22;128:1; 129:16,20;131:11,24; 134:5,11,22;137:1,6, 8;144:1,2;145:12,14, 22;146:13,25;147:14, 22;149:1;150:3,11;	breakdown (2) 247:10,25 breaking (1) 248:9 breaks (1) 269:13 brief (6) 71:18;113:20,20; 122:10;214:16;269:6 Bright (2) 12:24;143:22 bring (1) 187:12 bringing (1) 190:9 broad (1) 74:11 broadly (2) 164:4;197:11 brother (3) 48:25,25;50:17 brother-in-law (2) 49:5,7 brought (5) 111:13;186:23; 187:12,18;188:10 buck (1)

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 281 of 362 Bostock v. Video Deposition Colin Slay September 10, 2021

Clayton County				September 10, 2021
5:10,12;9:10;16:1;	95:7	Care (10)	234:2;236:21;238:23;	caused (5)
17:9;23:4,7;27:5;	calendar (1)	17:1;23:17;24:7;	234.2,230.21,238.23, 239:2,4,5,6,7,9,14;	78:21;158:9;
28:12,14;32:10;	93:16	72:24;116:12;139:16,	240:6;242:16;245:13,	160:25;161:20;215:7
71:15,23;81:2;86:11;	call (18)	20;182:25;189:13;	16,19,20;246:14;	causing (1)
88:20;93:10;106:9;	9:23;12:15;16:13;	245:14	250:5,22;251:11,15,	11:1
110:1;128:10;130:22;	44:21;53:1;66:24;	careful (1)	24;253:11,25;255:19;	cc (1)
132:8;138:16;142:7,	70:15,16;76:8;93:18;	83:13	256:18;261:5,18;	150:4
13;144:14;150:1;	112:16;156:15;	carefully (1)	262:10,15;263:14;	cell (2)
167:5,18;168:10,13;	207:25;208:5,8,9;	101:5	264:22;265:10,11,21;	40:25;41:6
170:1,4,5;171:23;	230:5;261:13	Carnegie (1)	267:10;271:12,13,15	center (1)
175:20;179:24;180:6,	called (15)	51:25	CASA-related (5)	12:15
8;194:17;198:2;	10:8;31:10;32:21;	Carol (12)	124:11;235:4;	ceremonies (1)
199:17,23;200:15;	52:6;53:9;55:15;56:1;	13:19;15:9;114:17,	247:14;254:18;	174:21
202:9;204:2,16;	58:10;59:3,5;60:25;	24;116:4;153:21;	255:20	cert (1)
205:18;207:15;213:7,	64:12,14;113:22;	154:16;161:21;	CASA's (5)	53:2
11,12;214:12,19,20;	229:11	180:23;194:20;204:6,	149:12;195:24;	certain (8)
215:15;216:13;	calling (1)	7	222:13;223:1,4	11:24;63:4;78:23;
218:10;219:11;	59:11	Carolina (2)	CASA-sponsored (1)	84:7;94:23;162:15,
220:18,22;221:3,19;	calls (2)	50:10,23	263:9	18;195:6
256:1;260:7,10;	10:20;28:11	carve (1)	case (31)	certainly (10)
268:25;269:9,11;	came (12)	7:10	6:24;7:17;8:13;	11:20;19:23;37:11;
272:9,13	11:25;12:3;22:9;	CASA (216)	12:5;26:5;27:22;28:8;	40:22;96:1,4;177:8;
budget (2)	45:22;75:13;102:24;	11:23;12:6;15:20,	40:17;41:3;48:2;	209:7;220:13;235:22
225:10;264:22	104:22;122:4;160:11;	22;17:1,2,19;20:8,13,	112:12;165:18;	certainty (1)
budgeting (1)	161:10;206:24;	16;21:9,12;22:4,7,8,	191:19;192:4;205:13;	177:21
257:8	215:25	18,23;23:2,5,9,16;	216:1;217:23;218:13,	certificate (1)
BUECHNER (1)	CAMERA (20)	24:7,25;25:17;26:1,	17;219:5,20,23,25;	53:3
170:3	5:1;71:17,19;142:9,	25;28:6;29:4,5,8,10,	220:14;229:10;	certification (4)
building (10)	11;154:23;155:3,4,7,	23;30:2,11,17,19,22;	231:18,23;239:18;	52:24;53:1;56:9,9
42:14;43:24;53:6,7,	8,15,16,19;156:8,11; 214:15,17;269:5,7;	31:3,21;32:4,20;36:3;	252:7;262:2;264:10	certified (1) 53:4
23;133:17;158:25; 160:5;175:9,12	272:17	38:4;64:3,19;72:4,10, 12,13,14,24,25;73:6;	cases (9) 24:15;28:20;	cetera (3)
built (1)	can (32)	74:3,20;75:5,8,8,21;	115:10;182:8,9;	24:8;197:8;198:19
251:19	13:3;20:5,25;38:12,	76:12;92:10;96:19;	183:1,5;202:17;	chain (4)
bump (1)	16;49:15;50:8;53:21;	102:9,10;110:18,19;	239:24	79:15;103:1;
55:17	67:14;71:25;77:4;	111:17;113:8;114:4;	Casey (8)	205:19;228:23
bunch (2)	96:5;114:8;120:13;	115:7;116:6,12,17;	51:22,25;54:1;	chair (8)
67:17;132:24	132:4;142:21;148:17;	117:4;118:12,25;	209:14;210:16,17,18,	110:18;138:8;
Burton (1)	154:24;167:20;168:8;	119:3,8;121:25;	19	145:19;151:7;203:13;
125:4	169:8;188:24;203:24;	125:12,23;126:1;	Cash (18)	236:23;256:6,6
business (6)	207:24;221:22;	127:7;129:24;130:12;	24:2;25:8;72:20;	chairman (17)
30:13;35:15;41:9;	233:11,12;238:2;	133:8;135:3,4,16,24;	121:5;153:13,13,15,	122:15,15,19;
196:2;209:25;210:4	264:8;265:4,14;	136:1,2;137:7,25;	18,24;170:15;188:20,	127:22;129:6,14,15;
buttons (2)	269:15	138:7;140:9,18,19;	22,25;189:4,11,22;	201:9,10,19,25;
45:4,5	capacity (1)	141:7,21;148:21,21,	241:19;267:12	236:22,24,25;237:1,6;
buy (2)	75:18	23;149:14;155:20;	casual (1)	238:16
26:22;133:2	captioned (4)	159:25;163:9;164:13;	229:4	chairperson (5)
buying (1)	90:8;93:11;215:18;	169:14,17;170:6,25;	casually (1)	126:2,4,5;243:13,
258:7	246:25	171:2,2,3,8,14;172:7,	219:1	14
bylaws (9)	car (2)	15;173:4;174:9,16,16,	categories (4)	chair's (1)
125:25;169:12;	9:13;109:5	22;176:1,9,9,10,11,	91:9;123:6;240:10;	126:20
197:2;238:23;243:9,	card (23)	15,16;180:24;181:1,8,	247:11	challenges (1)
22;255:19;259:4,22	127:17,18,19; 134:22;135:4,11;	10;182:7,18;183:17; 184:9;189:5;192:21;	category (4) 87:10;94:7;247:12,	91:21 chambers (3)
C	134:22;135:4,11; 137:6,23;138:8,13;	184:9;189:5;192:21; 193:24;195:9,10,11,	87:10;94:7;247:12,	chambers (3) 208:24;209:2;
	145:17,18;146:3,3,5,	16,23;196:5;197:9;	Catherine (4)	212:20
Caitlin (1)	7,18;147:7;151:6;	198:18,18,19;201:1,	47:19;105:14,15,18	change (7)
48:3	195:8;211:24;212:1;	13,15,24;202:5,18;	Cathy (1)	42:20,23;57:12,13;
C-a-i-t-l-i-n (1)	254:20	203:2,6;204:20,23;	105:22	155:13;172:8;214:12
48:3	cards (8)	205:6,9;222:9;	causation (1)	changed (10)
cake-and-punch (1)	119:25;127:13,14;	223:20;225:5,7;	85:11	19:3;64:15;89:19;
175:2	145:15;147:14;	226:2,9;228:5,11,14;	cause (2)	171:4;172:5,10;
calculation (1)	150:11;245:17,22	232:17;233:11,12,24;	85:13;153:9	177:12,20,23,24

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 282 of 362
Bostock v. Video Deposition
Clayton County **Colin Slay September 10, 2021**

character (1) 221:16 character (2) 16:3;61:22 16:3;61:22 16:3;61:22 16:3;61:22 16:3;61:22 16:3;61:22 16:3;61:22 16:3;61:22 16:4;72:11;170:6;250:11 221:23;244:7;245:10;241:29;18:16:21 221:23;244:7;245:10;241:29;18:16:21 221:23;244:7;245:10;241:29;18:16:21 221:23;244:7;245:10;241:29;18:16:21 221:23;244:7;245:10;241:29;18:25:21;14:22:21:23;244:7;245:10;241:29;18:25:21;14:22:21:23;244:7;245:10;241:29;18:25:21;14:22:21:23;244:7;245:10;241:29;18:21:23:23:24:23:21;244:17:24:21:23:23:24:23:22:23:24:23:22:23:24:23:22:22:23:21:23:24:24:23:22:24:24:17:24:21:22:24:24:25:22:22:22:23:23:17 269:22:270:2; 271:2; 29:1; 29	Clayton County September 10, 2021				
18.15.268.22	changes (2)	167:10 11:172:19 20	49.6.52.14.261.7	4 5 5 6 9 18 20:240:6:	195.5
changing (2) 1793.59.180.17, 1791.91.180.14 184.8 184.					
179-19.180-14 1954-198.11-234-18, chaplain (1) 281-1284-18, chaplain (1) 281-1284-18, character (1) 241-1284-19.29-6; descriptive (2) 16-3:661-22 16-3:661-22 183-6.24-195-21; 271-13-15 261-22-24-6.19.29-1 183-6.24-195-21; 241-22-24-6.19.29-1 183-6.24-195-21; 241-22-24-25-22-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-24-25-25-24-					` /
chaplain (1)					
character (t)	chaplain (1)				
221:16 48:460:1,216:48; clarification (2) clear (25) (16:36:122) (16:36:122) (16:36:122) (16:36:122) (16:36:122) (16:36:122) (16:36:122) (16:36:142:15:10) (16:36:142:15:16:16:16:142:15:10) (16:36:142:15:16) (16:36:142:15:10) (16:36:142:15:16) (16:36:14	184:8	child (29)		264:22;267:17;	college (2)
characterize (2)	character (1)	24:11;28:4,9;29:6;	40:2	271:13,15	51:11;54:24
1663;61:22	221:16	48:4;60:1,21;64:8;	clarification (2)	clear (25)	Collier (1)
charged (1)	characterize (2)	114:18;116:19;121:9;			
262;3466,174,554; 213:1170,6220:11 243:25					
221:1370-6;250:11 242:5 charges (2) 247:16.21 246:12254-6;256:10: 247:16.21 247:16.21 247:16.21 248:17 248:17 Charles (1) 249:22270:2: 247:12.22 248:17 269:12.223-24 248:17 269:12.223-24 248:17 269:12.223-24 248:17 269:12.223-233-1 255:12 261:16:23.2517:217: 183:19:186:22.203:7 271:2.8 261:16:23.2517:217: 183:19:186:22.203:7 271:2.8 244:12.24;259:12 244:12.24;259:12 244:12.24;259:12 261:16:23.2517:217: 183:19:186:22:203:7 271:2.8 261:16:23.2517:217: 252:517:26:1.25: 247:15.20;248:8 chastised (1) 63:10 63:10 64:14:2063 64:10 63:10 64:10 63:10 64:10 63:10 64:10 63:10 64:10 63:10 64:10 64:10 65:1					
charged (1) 242:15 242:15 242:16 246:13254:6(256:10) 247:16,21 247:16,21 315:47:122:49:3; charliable (4) 35:14,21;113:3; 255:12 29:1 Charlisty (1) 138:12 Charles (1) Charles (2) 247:15.20;248:8 chastised (1) 162:1 16					
242:5 charges (2) charges (2) 247:16.21 charges (2) 31:5;47.22;49.3; 64:14;266:3 charges (1) 255:12 charity (1) Chile's (5) 252:12 (2):10:23:10:13; 225:12 charges (1) 252:12;29:19; 238:27:12; 232:22:23:12 charges (1) 252:12;29:19; 238:27:12; 232:22:23:12 charges (1) 252:22;270:2; 271:2,8 chart (4) 161:23.25;172:17; 232:23.4;16;24:15; 20, 247:15;20;248:8 chart (4) 161:23.25;172:17; 232:23.4;16;24:10; 235:11,232:3,19;34:13; 247:15;20;248:8 chock (2) 10;23:24;25:24;25:24; 255:21; 215:25;25;12:26:10; 255:21;26:10; 255:21;26:10; 255:21;26:10; 255:21;21:3 checkbook (4) 145:15;16;147:15; 150:12 checkbook (4) 145:15;16;147:15; 150:12 checked (1) 162:25;18:23;25; 215:24:25:25; 215:25;21;26:10; 215:25;21;26:10; 215:10:20; 215:25;21;26:10; 215:10:20					
charges (2)					
247:16,21 charitable (4) 35:14,21;113:3; 255:12 29:1 Charles (1) 27:14 29:1 Charles (1) 28:22:22:33:17 Charles (1) 28:22:22:33:17 Charles (1) 28:22:22:33:17 Charles (1) 28:22:22:33:17 Charles (1) 28:22:22:23:17 Charles (1) 28:22:22:23:17 Charles (1) 28:22:22:24:41:5:20, 28:11:22:12:24:41:5:20, 28:12:22:26:8.18, 16:12:32:51:17:17; 16:12:32:51:17:17; 28:62:43:28,3.62:39:34:13, 36:10 check (21) 28:4 16:10:32:31:72:12:22:26:8.18, 16:21 16:11:30:10 check (21) 28:4 16:21:30:10 16:11:30:23:31:72:12:22:26:8.18, 16:21 16:15:138:24:166:7; 170:17:17:22:42:548, 255:21:12:26:10; 258:42:25:29:1 255:21:12:26:10; 258:42:25:29:1 20:99 21:14:41:42:25:21:21 20:12:4 21:15:61:12 21:14 21:14 21:14:15:15:16:147:15; 150:12 checkbook (4) 145:15;16:147:15; 150:12 checkbook (4) 145:15;16:147:15; 150:12 checkbook (4) 161:12:25:218:2,25; 219:19 21:10:23:40:218:46 21:11:11:20:14:21; 150:12 checkhook (4) 161:12:32:31:12:13:25:11:23:23; 161:64:31:30:15; 171:12:13:13:15; 172:12:13:17:22:18:46 circulate (4) 217:12:18:10 227:14 249:23 244:24:24:46:61 223:21:19:21:19:21 23:25 23:19:20:8 23:19:20:18 23:19:20:18 249:21 249:22 244:22 241:2 249:23 249					*
charitable (4) 255:12 255:12 26harity (1) 138:12 20:21;21:2;29:19; 232:22;233:17 26hart (4) 26hilmuna (6) 16hi2s (3) 26hilmuna (6) 16hilmuna (
35:14,21:113:3; 25:12 25:18 25:18 25:12 25:11 25:18 25:12 25:11 25:18 25:12 25:11 25:18 25:12 25:11 25					
255:1/2 Chairty (1) Chilik's (5) Chilik's (5) 20:21;21:229:19; 20:21;21:229:19; 20:221;21:2,129:08, 11:22;12:44;15:20, 12:14;24;179:11; 12:14;24;179:11; 12:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:11; 13:14;24;179:12; 13:14;24;17					
Charles (1) 138:12 20:21:21:22:91:9; 20:21:21:22:91:9; 20:21:21:22:91:9; 20:21:21:22:08.18 20:22:21:17:21:21:24:41:52:0, 20:22:17:12:42:41:79:14:24:179:175; 24:12		` '			
138.12					
Charles (1) 48:17 chart (4) 269:22;270:2; 771:2,8 charts (3) 247:15.20;248:8 chastised (1) 63:10 66:10 109:20 244:41.224;25:9,12, 15:28:565:77:22;1, 116:15;138:24;166:7; 170:17;172:24;254:8; 255:21;125:10 255:21;125:10 255:21;125:10 255:21;125:10 255:21;23 checkbooks (4) 145:15,16;147:15; 150:12 checkdooks (4) 145:15,16;147:15; 150:12 checkdook (2) 255:12,13 checkbooks (4) 156:12 116:15;138:24;106:7; 170:17;172:24;254:8; 156:12 116:15;138:24;106:7; 170:17;172:24;254:8; 150:12 checkdook (2) 255:21;13 checkbooks (4) 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:12 156:13 150:12 156:14 156:14 156:15;138:24;106:7; 170:16;249:18 156:15;138:24;106:7; 170:17;172:24;254:8; 156:12					
48:17 Chilmuna (6) 12,16;21:22:26,84,8 234:9,21;244:6 comments (3) 161:23,25;172:17; 23;23;23,4,16;24:17, clerk's (4) 196:10:190:21; 268:16 comments (3) 162:1 choice (1) 31:21;32:3,19;34:13; 235:23 clicked (1) 244:12;24:25:9,12, choose (1) 38:26;437;11;51:4; 109:20 54:7,11;51:4; 109:20 54:7,11;51:4; 255:2,11:256:10; 258:4,25;259:11 258:4,25;259:12, 205:5,28;25;24:253:2 checkbook (2) cigars (1) 15:6,14;23;116:6,6, 21:14 12:14; 21:15;14;15:12; 21:17;258:5 21:19:19 21:19:22;18:2,5; 21:19:19 21:19:22;18:2,5; 21:19:19 21:19:22;218:2,6; 21:11;153:13,15; 170:16;249:18 circulated (5) 171:11;153:13,15; 170:16;249:18 circulated (2) 102:3;40:21;41:4; 56:18,25;57:2,24;25; 61:1(64:7;73:19;24; 61:16;47;73:19;24;					
chart (4) 269:22;270:2; 271:2,8 charts (3) 247:15;20;248:8 chastised (1) 63:10 63:10 64-tek (21) 199:20 244:41,2;42;5:9,12, 151;28:5;65;77:221; 116:15;138:24;166:7; 170:17;172:24;254:8; 255:24;12;56:10; 258:4,25;259:1 checkbook (2) 258:4,25;259:1 checkbook (3) 145:15,16;147:15; 150:12 checked (1) 156:12 checked (1) 156:13 charts (3) 162:1 09:20 544;15,20;643:24; 73:6,2074;4,20;75:5, 170:17;172:24;254:8; 255:2,11;256:10; 258:4,25;259:1 checkbook (2) 255:2,11;256:10; 258:4,25;259:1 checkbook (3) 145:15,16;147:15; 150:12 checked (4) 108:11;205:21; 209:9 110:18;114:4,20; 26hecked (1) 279:19 110:18;114:4,20; 271:19,21 271:19 271:	, .				
269:22;270:2; 271:2,8 charts (3) 247:15,20;248:8 charts (3) 247:15,20;248:8 charts (4) 63:10 check (21) 24:4,12,24;25:9,12, 152:85;65:77:2;21; 16:15;138:24;166:7; 170:17;172:24;254:8; 255:2,11;256:10; 258:4,252:9,11;256:10; 258:4,252:9,11;256:10; 258:4,252:9,11;256:10; 258:4,252:9,11;256:10; 258:4,252:9,11;256:10; 258:12,33 checkbook (2) 255:12,13 checkbook (3) 145:15,16;147:15; 150:12 checked (1) 216:25;218:2,25; 219:19 checkook (4) 126:15,138:12,255; 219:19 checkook (4) 126:15,138:11,221:15; 150:12 check (4) 216:25;218:2,25; 219:19 126:25;218:2,25; 219:19 126:25;218:2,25; 219:19 126:25;218:2,6; 217:10,20;218:16; 227:14 (1) 153:2,4;164:15;16; 147:15; 170:16;249:18 (1d) 153:9;174:1 (1b) 27:14; 25:18;19;175:23; 25:10;10,20; 20; 20; 20; 20; 20; 20; 20; 20; 20;					
271:2.8					` ,
charts (3) 247:15,20;248:8 chastised (1) 63:10 check (21) 109:20 54:4,12,24;259;12, 152:825;657:72:21; 116:15;138:24;1667; 170:17;172:24;254:8; 255:22,11;256:10; 255:2,11;256:10; 255:12,13 checkbook (2) 255:12,13 checkbooks (4) 145:15,16;147:15; 150:12 checkbooks (4) 145:15,16;147:15; 150:12 checkding (4) 108:11;205:21; 213:17;258:5 checks (13) 08:11;205:21; 217:10,20;218:16; 210:11;15;11;12,14 circulate (4) 217:10,20;218:16; 217:10,20;218:16; 220:12;240:25 checks (13) 08:11;205:21; 217:10,20;218:16; 220:12;240:25 checks (13) 08:11;24:20 00se (8) 0se (8) 0sig (106:22;					
check (21) 24:4,12,24;25:9,12, 152:8;65:7;72:21; 116:15;138:24;166:7; 170:17;172:24;254:8; 255:2,11;256:10, 258:4,25;259:1 checkbook (2) 255:12,13 checkbook (3) 255:12,13 checkbook (4) 145:15,16;147:15; 150:12 checked (1) 156:12 checked (1) 156:15;13;15; 150:12 checked (1) 156:15;15;15;15;15;15;15;15;15;15;15;15;15;1					
chastised (1) 63:10 63:10 63:10 check (21) 109:20 54:7,15,20,64:3,24; 15;28:5,65:7,72:21; 116:15;138:24;166:7; 170:17;172:24:254:8; 255:2,11;256:10; 258:4,25;259:1 checkbook (2) 255:12,13 checkbook (2) 255:12,13 checkbooks (4) 145:15,16;147:15; 150:12 checkbooks (4) 145:15,16;147:15; 150:12 checkdooks (4) 155:12 checkdooks (4) 150:12 checkdook (2) 252:11;255:11;20;21; 213:17:258:5 check (1) 181:190:20 181:11:11:11:11 182:12 182:11 182:12 183:11 182:12 183:11 182:12 183:12 183:12 183:12 183:13 183:12 183:12 183:13 183:					
check (21) 24:4,12,24;25:9,12, 15:28:5;65:7;72:21; 116:15;138:24;166:7; 170:17;172:24;254:8; 255:2,11;256:10; 258:4,25;259:1 checkbook (2) 255:2,11;23 checkbook (4) 145:15,16;147:15; 156:12 checkd (1) 156:12 checkd (1) 156:12 checkd (1) 108:11:205:21; 213:17:258:5 checking (4) 108:11:205:21; 213:17:258:5 check (1) 108:11:205:21; 213:17:258:5 circulate (4) 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 217:10,20;218:16; 218:17:258:5 circulating (3) 24:4;25:3,3,6,20, 21;72:2;1116:20; 117:11;153:13,15; 170:16;249:18 Chick-fil-A (1) 188:5 chief (49) 10:23;40:21;41:4; 56:18,25;57:2,24,25; 58:9,10,13,15;59:14, 16:60:13,3,6,15,21,25; 6:11;64:77:31:9,24; 85:19,22;106:25; chief (49) 10:23;40:21;41:4; 56:618,25;57:2,24,25; 58:9,10,13,15;59:14, 16:60:13,6,15,21,25; 6:11;64:77:31:9,24; 85:19,22;106:25; chief (9) 10:23;40:21;41:4; 16:60:13,6,15,21,25; 6:11;64:77:31:9,24; 85:19,22;106:25; chief (49) 10:23;40:22; 223:20;2225:7;226:1, 223:20;223:31:11,12;34:2; 223:20;223:20;225:7;226:1, 223:20;223:31:11,12;34:2; 223:11,12,234:2; 223:11,12,234:2; 223:11,12,234:2; 223:11,12,234:2; 223:13,11,12,234:2; 220:13;20:12,23; 220:12;240:25;	chastised (1)	` /		clients (1)	
24:4,12,24;25:9,12, 15;28:5;65:7,72:21; 125:4 73:6,20;74:4,20;75:5, 170:17;172:24;254:8; 255:2,11;256:10; 258:4,25;259:1 checkbook (2) 255:12,13 checkbook (3) 245:15;16;147:15; 150:12 checked (1) 156:12 checking (4) 108:11;205:21; 213:17:258:5 checking (5) 217:22;218:4.6 circulating (3) 224:4;25:3,3,6,20, 217:22;218:4.6 circulating (3) 224:4;25:3,3,6,20, 217:22;218:4.6 circulating (3) 227:12;218:4.6 circulating (3) 227:12;218:4.6 circulating (3) 227:14;218:15; 170:16;249:18 Chick-fil-A (1) 188:5 chief (49) 10:23;40:21;41:4; 56:18,25;57:224,25; 58:9,10,13,15;59:14, 16;60:1,3,6,15;21,25; 58:9,10,13,15;59:14, 16;60:1,3,6,15;21,25; 58:9,10,13,15;59:14, 16;60:1,3,6,15;21,25; 58:9,10,13,15;59:14, 16;60:1,3,6,15;21,25; 61:1;64:7;73:19,24; 85:19,22;106:25; 26:9;34:20 223:20;225:7;226:1, 85:19,22;106:25; 26:9;34:20 223:20;225:7;226:1, 123:11;23:37: 20; 203:11,12;23:12; 203:20;203:6; 203:11,12;23:42; 203:20;225:7;226:1, 128:14; 203:20; 203:20;225:7;226:1, 128:14;253:25; 203:22;04:20;23; 203:220;225:7;226:1, 128:14;23:14; 25:19:22;106:25; 223:20;225:7;226:1, 128:14;23:14; 25:19:31;15;23:15; 213:17;23:15; 213:17;23:12; 203:20;225:7;226:1, 23:17;23:23; 223:225:22; 223:223:223:223:223:223:223:223:223:223	63:10	choose (1)	38:2,6;47:7,11;51:4;	124:20	236:20
15;28:5;65:7;72:21; 16:15;138:24;166:7; Christmas (3) 31:6;252:24;253:2 90:11:92:10;96:18; 163:6;188:18;269:2 271:19,23 27	check (21)	109:20	54:7,15,20;64:3,24;	close (8)	Commissioners (2)
16:15;138:24;166:7; 170:17;172:24;254:8; 255:21;1256:10; 258:4,25;259:1 209:9 110:18;114:4,20; 125:11,23 255:12,13 212:14 216:1172;118:11, 255:12 212:14 216:1172;118:11, 255:12 212:14 216:1172;118:11, 255:12,13 216:25;218:2,25; 150:12 219:19 216:12;25;113;23:1, 219:19 216:13;25:1,133:10; 217:10;20;218:16; 218:17;258:5 210:12;240:25 149:11,14;155:20; 164:18;169:14,16; 170:16;249:18 216:12;27:14 12:10;15:11,12,14 227:15 227:14 227:15 227:14 227:15 227:14 227:14 227:15 227:14 2	24:4,12,24;25:9,12,	Chris (1)		9:13;108:22;	
170:17;172:24;254:8; 255:2,11;256:10; cigar (1) 102:9,10;106:11; 102:9,10;106:1					
255:2,11;256:10; 258:4,25;259:1 2099 20;253:11;256:10; 258:4,25;259:1 2099 20;257:2,13 21:14 21:15:6,14,23;116:6,6, 24:4;84:11;113:25; 260:8 20:10;01:15;11,12;115;113;21:15; 229:13;250:6;258:22; 260:8 260					
258:4,25;259:1 checkbook (2) cjars (1) clie (4) 212:14 clie (4) 215:12;13 checkbooks (4) 145:15,16;147:15; 150:12 checked (1) 156:12 checking (4) 108:11;205:21; 213:17;258:5 checking (3) 214:18;24:25; 213:17;258:5 check (13) 214:24;25;218:4,6 217:10;20;218:16; 217:12;218:4,6 circulating (3) 217:22;218:4,6 circumstances (4) 170:16;249:18 Chick-fil-A (1) 188:5 chief (49) 100:23;40:21;41:4; 56:18,25;57:2,24,25; 58:9,10,13,15;59:14, 16:60:1,3,6,15,21,25; 100:18:114,420; 115:6,14,23;116:6,6, 112;6,117:2;118:11, 25;119:8;121:24,25; 120:12;129:24; 120:12;129:24; 120:12;129:24; 120:12;129:24; 120:12;129:24; 120:12;129:24; 120:12;129:24; 121:12;125:11;125:12; 121:14 125;119:12;129:24; 121:13,37; 138:7,7;139:8;140:9, 188:7,7;139:8;140:9, 188:19;141:20;146:8; 170:16;249:18 Chick-fil-A (1) 188:5 chief (49) 10:23;40:21;41:4; 56:18,25;57:2,24,25; 58:9,10,13,15;59:14, 16:60:1,3,6,15,21,25; 120:12;40:22;123:42 20:12;40:22;1220:3,6; 131:12;234:2; 131:12;34:25 130:12;13,37;134:10; 130:12;133:7;134:1					
checkbook (2) cigars (1) 115:6,14,23;116:6,6, 12,16;117:2;118:11, 126:23 42:4;84:11;113:25; 126:23 260:8 commonly (1) checkbooks (4) Circuit (1) 25;119:8;121:24,25; 125:11,23;23; 150:12 70:17;91:22 commonly (1) checked (1) 216:25;218:2,25; 218:2,25; 219:19 130:12;133:7;134:10; 135:2,4,16;137:7,24; 219:19 Coalition (1) 244:22 commonplace (1) 244:22 communicate (2) 41:8;44:13 communicate (1) 244:22 communicate (2) 41:8;44:13 communication (2) 44:12 20:14:204 20:11:11:13:25 communicate (2) 41:8;44:21 20:14:204 20:14:204 44:12 20:14:204 44:12 20:14:204 44:12 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19 20:14:204:19					
255:12,13					
checkbooks (4) Circuit (1) 25;119:8;121:24,25; coaching (2) 58:21 145:15,16;147:15; 150:12 circulate (4) 122:15;125:11,23,23; 70:17;91:22 commonplace (1) checked (1) 216:25;218:2,25; 130:12;133:7;134:10; 210:24 communicate (2) checking (4) circulated (5) 138:7,7;139:8;140:9, 153:6 communicate (1) 108:11;205:21; 217:10,20;218:16; 18,19;141:20;146:8; 171:21,25 communicated (1) 213:17;258:5 220:12;240:25 149:11,14;155:20; COLIN (10) 44:12 communicate (2) 24:42:2 20mmunicate (2) 41:8;44:13 communicate (2) 41:8;44:13 communicate (2) 217:12,258:5 220:12;240:25 149:11,14;155:20; COLIN (10) 44:12 communicate (2) 24:4:25:3,3,6,20, 217:22;218:4,6 170:13,22;171:7,8,12, 166:18;169:14,16; 166:18;169:14,16; 166:22;198:7;200:18; 202:14;204:19; 202:14;204:19; 202:14;204:19; 202:14;204:19; 202:14;204:19; 216:15;229:14 collaboration (1) 57:19 company (2) 247:15,21					
145:15,16;147:15; 150:12					• ` '
150:12					
checked (1) 216:25;218:2,25; 130:12;133:7;134:10; 210:24 communicate (2) checking (4) circulated (5) 138:7,7;139:8;140:9, 153:6 communicate (1) 108:11;205:21; 217:10,20;218:16; 138:7,7;139:8;140:9, 153:6 communicate (1) 213:17;258:5 220:12;240:25 149:11,14;155:20; 171:21,25 communication (2) checks (13) 21:72:21;116:20; 217:22;218:4,6 170:13,22;171:7,8,12 COLIN (10) 44:18;250:7 217:22;218:4,6 170:13,22;171:7,8,12 16:19,11,15,16; 16:32,21,198:7;200:18; 202:14;204:19; communication (2) 217:22;116:20; 12:10;15:11,12,14 176:19,11,15,16; 16:32,21,198:7;200:18; 202:14;204:19; communication (2) Chick-fil-A (1) 227:14 182:5;185:3;189:5; 193:15,24;195:9,10, 194:9 194:9 194:9 124:20;262:10 company (2) 124:20;262:10 company (2) 124:20;262:10 247:15,21 26:11,64:7;73:19,24; 26:9;34:20 29:23:20;225:7;226:1, 30:14,16;114:22; 262:1 competed (1) 26:124 26:124 26:124 compiled					
156:12 checking (4)				, ,	· ·
checking (4) circulated (5) 138:7,7;139:8;140:9, 18,19;141:20;146:8; 213:17;258:5 153:6 communicated (1) checks (13) 24:4;25:3,3,6,20, 21;72:21;116:20; 117:1;153:13,15; 170:16;249:18 circulating (3) 164:18;169:14,16; 170:13,22;171:7,8,12, 170:16;249:18 ColLIN (10) 44:18;250:7 communication (2) 44:18;250:7 communication (3) 7:11;44:24;250:5 7:11;44:24;250:5 communication (3) 7:11;44:24;250:5 7:11;44:24;250:5 communication (2) 44:18;250:7 communication (3) 7:11;44:24;250:5 7:11;44:24;250:5 communication (3) 7:11;44:24;250:5 7:11;44:24;250:5 7:11;44:24;250:5 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; 20:14;204:19; <td>` /</td> <td></td> <td></td> <td></td> <td></td>	` /				
108:11;205:21; 217:10,20;218:16; 18,19;141:20;146:8; coffers (2) 44:12 213:17;258:5 220:12;240:25 149:11,14;155:20; 171:21,25 communication (2) 24:4;25:3,3,6,20, 217:22;218:4,6 170:13,22;171:7,8,12, 5:6;86:16;150:4; communications (3) 21;72:21;116:20; 12:10;15:11,12,14 176:1,9,11,15,16; 202:14;204:19; 202:14;204:19; communications (3) 170:16;249:18 cite (1) 177:18;179:12;180:2; 216:15;229:14 57:19 community (1) Chick-fil-A (1) 227:14 182:5;185:3;189:5; collaboration (1) 57:19 company (2) 188:5 cited (2) 193:15,24;195:9,10, 194:9 124:20;262:10 chief (49) 153:9;174:1 16,23,24;196:5;198:5, collaborations (1) company (2) 18:25,557:2,24,25; 38:6;182:20,23; 203:2;204:20,23; 203:2;204:20,23; 247:15,21 58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; compete (1) 16;60:1,3,6,15,21,25; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 262:1 61:1;64:7;73:19,24; 26:9;34:20 29;233:11,12;234:2;					
213:17;258:5 checks (13) 24:4;25:3,3,6,20, 21;72:21;116:20; 117:1;153:13,15; 170:16;249:18 Chick-fil-A (1) 188:5 chief (49) 10:23;40:21;41:4; 56:18,25;57:2,24,25; 58:9,10,13,15;59:14, 16;60:1,3,6,15,21,25; 61:1;64:7;73:19,24; 85:19,22;106:25; 220:12;240:25 circulating (3) 149:11,14;155:20; 164:18;169:14,16; 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 171:21,25 COLIN (10) 5:6;86:16;150:4; 163:22;198:7;200:18; 202:14;204:19; 202:14;204:19; 202:14;204:19; 202:14;204:19; 201:15;229:14 201:15;22					
checks (13) circulating (3) 164:18;169:14,16; COLIN (10) 44:18;250:7 24:4;25:3,3,6,20, 217:22;218:4,6 170:13,22;171:7,8,12, 5:6;86:16;150:4; communications (3) 21;72:21;116:20; 12:10;15:11,12,14 13;172:15;175:23,23; 163:22;198:7;200:18; 7:11;44:24;250:5 170:16;249:18 12:10;15:11,12,14 176:1,9,11,15,16; 202:14;204:19; community (1) Chick-fil-A (1) 227:14 182:5;185:3;189:5; collaboration (1) 57:19 188:5 10:23;40:21;41:4; 153:9;174:1 16,23,24;196:5;198:5, 19;201:1,10,24; 57:22 247:15,21 56:18,25;57:2,24,25; 38:6;182:20,23; 203:2;204:20,23; 30:14,16;114:22; 247:15,21 58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 85:19,22;106:25; city (6) 29;233:11,12;234:2; 253:25 compiled (1)					
24:4;25:3,3,6,20, 217:22;218:4,6 circumstances (4) 13:172:15;175:23,23; 163:22;198:7;200:18; 170:16;249:18 cite (1) 177:18;179:12;180:2; 188:5 cited (2) 153:9;174:1 citizen (4) 156:18,25;57:2,24,25; 58:9,10,13,15;59:14, 16;60:1,3,6,15,21,25; 61:1;64:7;73:19,24; 85:19,22;106:25; city (6) 177:18;179:12;234:2; 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;171:7,8,12, 170:13,22;198:7;200:18; 163:22;198:7;200:18; 163:22;198:7;200:18; 163:22;198:7;200:18; 170:13,15;19:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;179:12;180:2; 177:18;199:12; 177:18;179:12;180:2; 179:19;19:19;19:19;19:19;19:19;19:19;19:19;19:19;19:19:19;19:19:19;19:19:19;19:19:19:19;19:19:19:19:19:19:19:19:19:19:19:19:19:1					
21;72:21;116:20;					
117:1;153:13,15; 12:10;15:11,12,14 176:1,9,11,15,16; 202:14;204:19; community (1) 170:16;249:18 cite (1) 177:18;179:12;180:2; 216:15;229:14 57:19 Chick-fil-A (1) 227:14 182:5;185:3;189:5; collaboration (1) company (2) 188:5 153:9;174:1 16,23,24;196:5;198:5, collaborations (1) compare (2) 10:23;40:21;41:4; 238:6;182:20,23; 203:2;204:20,23; 247:15,21 56:18,25;57:2,24,25; 38:6;182:20,23; 203:2;204:20,23; collected (10) compete (1) 58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 16;60:1,3,6,15,21,25; citizens (2) 219:6,7,21;220:3,6; 117:8;118:4,25; competed (1) 61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 85:19,22;106:25; city (6) 29;233:11,12;234:2; 253:25 compiled (1)					
170:16;249:18 cite (1) 177:18;179:12;180:2; 216:15;229:14 57:19 Chick-fil-A (1) 227:14 182:5;185:3;189:5; collaboration (1) company (2) 188:5 cited (2) 193:15,24;195:9,10, 194:9 collaborations (1) compare (2) chief (49) 153:9;174:1 16,23,24;196:5;198:5, collaborations (1) compare (2) 56:18,25;57:2,24,25; 38:6;182:20,23; 203:2;204:20,23; collected (10) compete (1) 58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 16;60:1,3,6,15,21,25; citizens (2) 219:6,7,21;220:3,6; 117:8;118:4,25; competed (1) 85:19,22;106:25; city (6) 29;233:11,12;234:2; 253:25 compiled (1)					
Chick-fil-A (1) 227:14 182:5;185:3;189:5; collaboration (1) company (2) 188:5 193:15,24;195:9,10, 194:9 124:20;262:10 10:23;40:21;41:4; 195:9;174:1 16,23,24;196:5;198:5, 19:201:1,10,24;					
188:5 cited (2) 193:15,24;195:9,10, 194:9 124:20;262:10 chief (49) 153:9;174:1 16,23,24;196:5;198:5, collaborations (1) compare (2) 10:23;40:21;41:4; 38:6;182:20,23; 203:2;204:20,23; 57:22 247:15,21 56:18,25;57:2,24,25; 38:6;182:20,23; 203:2;204:20,23; collected (10) compete (1) 58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 16;60:1,3,6,15,21,25; citizens (2) 219:6,7,21;220:3,6; 117:8;118:4,25; competed (1) 61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 85:19,22;106:25; city (6) 2,9;233:11,12;234:2; 253:25 compiled (1)	Chick-fil-A (1)				
chief (49) 153:9;174:1 16,23,24;196:5;198:5, collaborations (1) compare (2) 10:23;40:21;41:4; citizen (4) 19;201:1,10,24; 57:22 247:15,21 56:18,25;57:2,24,25; 38:6;182:20,23; 203:2;204:20,23; collected (10) compete (1) 58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 16;60:1,3,6,15,21,25; citizens (2) 219:6,7,21;220:3,6; 117:8;118:4,25; competed (1) 61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 85:19,22;106:25; city (6) 2,9;233:11,12;234:2; 253:25 compiled (1)					
10:23;40:21;41:4; citizen (4) 19;201:1,10,24; 57:22 247:15,21 56:18,25;57:2,24,25; 38:6;182:20,23; 203:2;204:20,23; collected (10) compete (1) 58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 16;60:1,3,6,15,21,25; citizens (2) 219:6,7,21;220:3,6; 117:8;118:4,25; competed (1) 61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 85:19,22;106:25; city (6) 2,9;233:11,12;234:2; 253:25 compiled (1)	chief (49)				*
58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 16;60:1,3,6,15,21,25; citizens (2) 219:6,7,21;220:3,6; 117:8;118:4,25; competed (1) 61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 85:19,22;106:25; city (6) 2,9;233:11,12;234:2; 253:25 compiled (1)		citizen (4)			
58:9,10,13,15;59:14, 183:22 205:5,6;216:14; 30:14,16;114:22; 262:1 16;60:1,3,6,15,21,25; citizens (2) 219:6,7,21;220:3,6; 117:8;118:4,25; competed (1) 61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 85:19,22;106:25; city (6) 2,9;233:11,12;234:2; 253:25 compiled (1)					5
61:1;64:7;73:19,24; 26:9;34:20 223:20;225:7;226:1, 121:8;149:4;187:25; 261:24 29;233:11,12;234:2; 253:25 compiled (1)					
85:19,22;106:25; city (6) 2,9;233:11,12;234:2; 253:25 compiled (1)		citizens (2)			
		,	223:20;225:7;226:1,		261:24
107:8;143:12;151:25; 11:25;48:20,21; 236:21;238:23;239:2, collecting (1) 192:16					
	107:8;143:12;151:25;	11:25;48:20,21;	236:21;238:23;239:2,	collecting (1)	192:16

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 283 of 362
Bostock v. Video Deposition
Clayton County Colin Slay September 10, 2021

Clayton County		· · · · · · · · · · · · · · · · · · ·		September 10, 2021
complaint (7)	conference (6)	containing (1)	246:13;254:7;256:10;	16;117:2;118:11,25;
205:23;206:1,19,	21:22;174:10,12;	225:10	261:3,7,17	119:8,23;121:8,24,25;
22;207:3,12;213:19	209:21;210:24,25	contemporaneous (1)	coordinator's (2)	122:15;124:3;125:12,
complete (5)	confidential (2)	147:6	244:8;245:14	23,23;126:1;127:7,
34:1;40:24;99:2;	145:23;231:11	contemporaneously (1)	copies (5)	11;129:2,3,17,18,21,
101:3;174:23	confirmed (3)	43:8	92:13;98:11,13;	24;130:12;133:8;
completely (3)	160:13,17,22	content (1)	117:13;154:1	134:2,4,6,6,8,10;
28:16;31:15;85:3	conflating (1)	84:2	copy (3)	135:2,4,16;137:7,9,
computer (3)	239:4	context (6)	81:21;215:4;272:20	24;138:7,7;139:8,12,
104:14,15;105:7	conflict (9)	23:23,24;36:7;	copying (1)	13;140:9,14,18,19;
concern (7)	123:15,22;124:4,	117:21;187:24;248:5	194:23	141:21;146:8;149:12,
78:21;83:25;101:6;	15,17;127:11;133:9,	continued (1)	cordial (2)	14;155:20;164:18;
118:24;125:18;	11,12	153:11	111:19;112:5	165:22,24;166:2,4,6,
128:21;260:17	conformance (1)	contracts (1)	corporation (1)	7;169:14,17;170:13,
concerned (6)	92:3	204:6	176:17	23;171:8,9,12,13;
78:12;103:20;	confused (2)	contributed (1)	correction (1)	172:15;175:15,22,23;
155:20;160:24;	180:9;253:9	148:20	172:11	176:1,9,11,15,16;
184:25;239:3	Congratulations (1)	contribution (1)	corrective (1)	177:18;179:12;180:2;
concerning (17)	5:18	54:6	67:1	182:5;185:4;189:5;
7:16;8:7;9:17;	connection (1)	control (7)	correctly (7)	193:15,24;195:9,10,
18:19;41:15;42:25;	120:3	19:19,23;193:14,	25:17;73:3;96:12;	16,23,24;196:5;
119:7;124:24;128:13;	consensus (1)	20;203:2;234:10;	110:8;147:11;181:24;	198:19:199:3;201:1,
139:25;153:12;176:7;	62:3	242:12	271:11	10,24;203:2;204:20,
197:21;246:5;249:22,	consented (1)	controls (8)	cost (2)	23;205:6,6;210:9,12;
24;267:10	167:14	16:5;238:19;	54:4;270:21	211:2,14,15,23;212:3,
concerns (20)	consider (7)	241:19;242:3,13;	costs (3)	15;219:6,7,21;220:3,
34:22,25;78:6;84:6;	21:8;22:12;26:18;	259:25;260:12;	23:24;72:17;170:12	6;223:19,20;225:7;
101:22;103:5,7,8,15;	30:15;96:2;218:14;	267:10	Council (1)	226:1,2,9;233:11,12;
113:13,14;131:11,23;	257:20	conver (1)	183:3	234:2;236:21;238:23;
148:15,18;152:1;	considered (3)	63:23	Counsel (1)	239:2,4,5,6,7,9,18,20;
237:16,18,19,20	21:11;27:23;79:6	conversation (44)	64:14	240:6;242:16;245:13,
Concilia (6)	consisted (1)	8:10;14:12;15:15;	counseling (1)	19,20;249:14;251:23;
161:23,25;172:17;	26:8	36:21;62:2;63:21;	79:7	253:11,25;255:19;
183:19;186:22;	consistent (1)	82:20;83:19;84:3;	counties (1)	256:18;262:14;
189:10	59:15	108:2,3;111:9;	12:1	263:10;264:22;
C-o-n-c-i-l-i-a (1)	constitute (1)	135:19;137:22;	country (1)	267:17;271:13,15
161:25	123:21	157:11,13,14,16,17,	265:25	county-issued (1)
Concilia's (1)	constraints (1)	20;158:20;159:9;	County (270)	199:1
188:4	140:8	160:8,10,12,14,18,20,	7:4;8:7,17;10:13,	county's (1)
conclude (7)	construction (1)	22,24;184:25;185:17;	14;11:22;12:5;13:7;	210:8
101:13,14;102:7;	158:14	186:11;191:20;	15:20,20,22;17:1,2,	countywide (1)
156:21,22;160:25;	constructive (2)	208:15,16,18;222:5;	19;20:8,12,14,16;	121:5
161:19	68:3,12	228:3;232:5;233:14,	21:2,20,20,21;22:2,3,	couple (15)
concluded (7)	consult (1)	19;236:17;237:15	7,8,12,18,23;23:2,3,4,	9:24;11:12;33:20;
118:7;119:17,21;	78:24	conversations (25)	16;24:1,7,25;25:17;	56:11;72:5;93:5;
137:13;159:22;	consulted (1)	7:6,7,20,24;8:2,6;	26:1,15,21,21,23,25;	96:25,25;98:8;
259:24;272:23 concluding (1)	223:15 consume (1)	9:16;13:18,23;61:14; 78:1,3;82:17;83:16,	27:1,16,17,18;28:6; 29:4,5,8,10,19,23;	154:17;169:20;173:5; 268:20;269:12,19
267:4	232:20	24;89:14;137:17;	30:1,10,17,19,21;	course (17)
conclusion (7)	consumed (1)	139:21,25;152:13;	31:21;32:3,19;34:13;	8:21;10:20;35:15,
119:22;141:17;	124:13	162:3,7;185:16;	35:4;36:3,13;37:6,13,	19,23;50:13;61:15;
161:20;267:5,6,6,18	consuming (1)	225:23;236:10	14,15,24;38:2,6;39:9;	63:1;71:5;85:9;
concurred (3)	133:24	Coordinate (1)	40:6,25;41:9;42:1,3;	142:22;174:25;
61:21;62:3;63:1	contact (5)	64:13	43:20;45:18;47:8,12;	176:15;226:15;227:3;
concurring (1)	110:3;197:5,9;	Coordinating (1)	51:4;54:7,15,20;64:3,	228:22;260:23
63:5	202:16;204:8	64:14	24;65:9,13;69:13;	courses (1)
conduct (4)	contacted (6)	Coordinator (28)	72:4,4,10,18,24,25;	257:19
115:9;132:12;	110:6;143:10;	17:2;19:1;23:13;	73:6;74:4,20;75:5,8,	court (195)
137:9;152:25	203:8,11;268:3,4	24:8;26:2;56:2,4,14;	21;76:12,17;79:7;	5:4;6:13;11:16;
conducted (3)	contacting (2)	60:6,11,12;72:25;	92:10;96:19;97:17,	12:6;13:19;15:19;
66:17,18;238:16	109:17;267:24	74:3;172:19;182:20,	21;98:3;102:9,10;	17:3;19:4,9;24:1,11,
conducting (2)	contained (2)	24;183:23,25;195:22;	110:18;114:4,20;	20;25:11;26:1;27:22;
96:16;121:4	102:3;218:12	221:23;222:3;245:11;	115:6,14,23;116:6,12,	28:2,2,13,20,22;
		/		

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 284 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County	T		T	September 10, 2021
31:11;32:5;33:4,9,13;	198:22	225:21	94:12	deleting (1)
35:24;37:13;39:8,9;	Crawford (19)	custody (5)	dealership (8)	41:18
40:4;54:7,17,21,25;	9:3,11,17;10:3,7,	24:15;205:10;	9:13;109:6;111:10;	deletions (1)
55:7;56:21;57:1,15,	24;109:2;110:17;	222:12,16;223:3	112:2;126:12;146:1,	268:23
17;58:17,19,20;59:4,	111:20;112:11,20;	cut (6)	2;161:5	deliberating (1)
		6:11;33:22;34:3,5;		148:3
5;60:4;64:25;65:1;	126:5;145:19;151:7,		dealing (4) 7:25;10:25;66:9;	delivered (10)
72:3,18;73:1,20,24;	20;157:3,22;184:3;	40:13;214:5	97:21	
74:3;75:8;78:24;79:9,	185:17	D		25:7;116:20;144:1;
12;84:9;85:8;88:9;	Crawford's (3)	D	dealings (4)	145:16,18;146:4,5;
94:19;96:17,20;	111:9;120:14;	30.4	228:18,20;229:6;	151:7;198:22,25
106:3;114:17,20,21;	160:23	d/b/a (2)	236:5	demand (2)
115:6,9,15,16,24;	created (1)	195:10;245:20	Debbie (3)	120:14;129:11
117:10,11;127:11;	183:3	DA (11)	184:16;190:18;	demanded (3)
128:4;133:17,19;	credenza (1)	106:24;107:13,19,	191:15	145:14;147:13;
140:23;141:4,6,8,11,	153:16	19,20;151:24;152:9,	debit (17)	150:10
12,13,21;143:11,12;	credibility (1)	10;154:6,8;202:11	119:24;127:14,18,	demanding (1)
146:9;154:21;157:7;	267:16	dad (1)	19;134:22;137:6,23;	143:25
164:14,15;166:1,3;	credible (1)	50:17	138:8,13;145:15,17;	demonstrated (1)
167:10,11;170:14,22,	229:7	dad's (1)	146:7;147:14;150:11;	91:24
24;171:8,12,17,19,21;	credit (6)	48:15	195:8;245:21;254:19	Dennis (9)
172:1,6,14,14;173:14,	91:22;127:13,17;	dangers (1)	debit/credit (1)	207:21;208:3;
24;174:4,5,8;175:9,	135:4;211:24,25	53:19	245:17	213:16,20,21,25;
22,23;176:8,14,22;	credited (1)	dark (1)	Deborah (1)	214:3,4,6
177:1,3;178:3;179:4,	234:22	222:9	143:12	denominator (1)
4,5,6,7,8,12,13,15;	Crenshaw (10)	darn (2)	December (10)	83:11
180:3;181:2,4,12;	39:11;107:6,10,25;	255:17,18	198:7;204:18;	denominators (1)
182:6,9,15,21;183:3;	195:4;197:18,20;	DA's (13)	205:20,21;206:13,14;	83:11
184:19,20;193:13,15,	198:11;204:17;	39:10;107:11,12;	207:20;213:8,13,14	deny (1)
23;194:24;195:14,25;	207:21	108:11,16,18;156:10,	decide (3)	231:15
196:6;201:7;203:16;	criminal (5)	17;194:14;198:23;	35:9;212:7;263:5	Department (9)
205:10;210:4,7;	5:20;51:16;64:12;	203:20;204:3;208:13	decided (2)	10:15,22,24;65:14;
211:18;215:25;	200:5;207:5	dash (1)	36:2;143:23	96:16;105:9;194:10;
216:19,20;217:2,3,21;	criminally (1)	198:5	decision (22)	213:23;222:6
218:23,24;219:21;	207:11	date (4)	35:8,11;36:6;61:4,	departmental (1)
220:1;221:15,24;	crisis (1)	146:25;150:8;	6;62:13;91:10;	92:4
222:12,16;223:3;	97:22	158:23;189:18	108:17;113:7;137:16;	depend (1)
224:18,25;228:7,9;	critical (7)	dated (16)	148:3,5,7,13;151:2,3,	36:7
230:9;234:7,9,10,21;	19:17;77:7,9,10,12;	81:6;93:12;106:10,	17;152:8;208:13;	dependency (1)
238:15;239:19,21,24;	169:3,15	15;114:11;150:2;	216:1;217:2;237:7	12:5
240:2;241:1,6;244:7;	criticism (3)	168:15;179:25;	decisions (1)	depending (5)
246:15;253:21;255:8;	67:1;68:3,12	194:19;198:6;205:19;	63:5	46:13;67:20;
	criticisms (4)		deduction (1)	212:23;248:5;264:8
258:3;264:14;265:12, 18	67:25;69:2;70:2,11	215:18;216:15;	25:21	
_		221:22;252:23;256:9		Depends (1) 59:11
courthouse (20)	criticized (1)	dates (3)	Dee (1)	
12:12;13:10;17:3;	69:8	108:25;197:3;	203:11	deposed (1)
37:24;73:1;188:1,2;	criticizer (1)	200:10	deep (1)	232:1
209:25;220:6;230:21;	69:3	daughter (1)	76:14	deposit (4)
250:15,18,19;251:10,	Crook (1)	47:23	deeply (1)	23:20;116:25;
12,12,13,17,19;268:1	49:21	daughter's (2)	269:1	187:22;253:12
courtroom (4)	cross (1)	258:2,15	defects (3)	deposited (10)
105:18,25;106:1,2	255:16	day (11)	168:23,23;169:21	19:12;31:1;32:13,
courts (2)	crosses (1)	121:6;147:3,9;	defend (1)	22;116:16;117:9;
96:11;246:14	255:15	148:10;186:24;	207:11	118:2;189:5;247:2;
court's (5)	CROSS-EXAMINATION (1)	189:14;215:25;	defense (1)	252:24
19:13;28:25;60:11;	5:9	222:24;229:11;	157:24	deposition (18)
153:19;234:23	crossing (1)	267:24;269:17	definitively (1)	5:15,16;6:11,25;
court-sponsored (1)	257:22	days (2)	147:21	8:12,21;16:21;38:10,
222:9	current (5)	153:10;215:24	defunded (2)	15;72:6;112:12;
cousins (1)	42:10;172:20;	day-to-day (2)	82:13,22	142:23;169:9;229:9;
48:13	182:19;203:13;263:4	90:3;246:6	degree (4)	231:18,24;268:22;
cover (1)	currently (1)	DBA (1)	51:15,16,17;52:24	272:23
54:5	240:6	32:20	deleted (1)	deposits (1)
crafted (1)	cursory (1)	deadlines (1)	43:7	245:2

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 285 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County	1	I	T	September 10, 2021
Donuty (2)	183:6	director (17)	217:11	202:17;254:9;255:22;
Deputy (2)		director (17)		
195:4;198:11	dictates (1)	12:25;13:6;40:4;	discussing (1)	267:13
Derby (19)	77:19	56:20;57:1,6;58:17,	72:5	documented (2)
20:22;26:14;29:21,	differences (1)	19;59:4;85:20;	discussion (5)	193:21;260:2
22;30:20;31:25;	265:15	121:14;143:22;	71:21;114:2;152:7;	documenting (1)
34:18;153:15;158:14,	different (13)	194:23;213:22;	199:22;223:16	70:19
16;198:19;200:19,20,	34:10;55:2;57:2,4;	218:23,24;221:24	discussions (6)	documents (12)
21,25;201:18;204:23;	60:14;70:21;85:18;	directors (4)	7:15;67:25;156:20;	38:23;39:5,7;40:1,
232:12;271:23	90:12;135:18;213:4;	131:14;132:1,10;	161:17;168:2;242:15	12,16;43:1,1;104:13;
describe (2)	217:7;253:14;259:22	134:9	dishonest (2)	195:6;197:2;224:1
68:2;209:13	differently (1)	dirty (1)	78:7,13	d'oeuvres (1)
deserve (1)	67:14	95:7	dishonesty (1)	136:21
23:24	difficult (1)	disability (1)	84:8	dollars (2)
designated (4)	68:23	6:20	dislike (1)	234:12;271:3
32:13;170:24;	dig (2)	disagree (3)	103:22	donate (1)
179:13;245:2	70:1;77:4	89:7;111:21;158:6	dismiss (1)	201:21
designed (1)	digital (1)	disagreed (1)	266:12	donation (5)
29:22	154:23	89:11	display (1)	34:21;252:23;
desire (3)	diligence (1)	disagreement (1)	272:3	253:2,10;254:3
207:5,7,8	152:13	66:14	displayed (1)	donations (4)
destitute (1)	dime (1)	disagreements (2)	271:14	35:14,22;201:9;
28:24	258:7	66:16,22	dispute (6)	253:15
detail (6)	dined (1)	disappointment (2)	105:19;112:13;	done (16)
13:24;45:11;84:3;	29:20	104:2;108:6	113:16;230:4;270:25;	43:8;52:20;131:1;
101:15;103:10;	dining (2)	disbursement (4)	271:5	166:9,14;174:15;
186:13	163:4,6	19:13,15;238:20;	disrupt (1)	177:11;190:3;194:1;
detailed (1)	dinner (12)	244:18	11:6	201:22;235:1;240:13;
241:19	20:25;30:2;36:20;	disbursements (2)	disruptions (1)	246:17;252:21;
details (6)	125:5;133:22;142:6;	245:1;249:21	11:1	268:10;269:2
94:16;103:14;	209:6,8;212:7,8;	disc (1)	dissent (1)	doubt (1)
113:18;240:8;246:9;	247:14;256:12	71:8	63:12	261:10
263:6	dinners (2)	discarded (1)	distaste (1)	Douglas (1)
detain (1)	148:19;210:14	162:12	103:21	50:2
11:17	direct (11)	discerning (1)	distinct (1)	down (11)
detained (1)	61:11,18,19;86:3;	95:22	44:25	6:13;49:15;70:1;
11:10	115:25;119:24;	disciplinary (1)	distinction (1)	88:1;91:13;178:14;
detaining (1)	131:13;132:1;140:17;	137:14	148:24	183:9;207:19;215:25;
53:19	234:14;244:9	discipline (7)	distributed (1)	248:10;267:25
detention (6)	directed (7)	70:16,23,25;78:24;	170:25	downtown (2)
	` '	79:4;82:19;84:5		
11:20;53:10,14,20;	17:16;107:3;		distribution (2)	47:9;49:5
56:6;209:18	127:22;130:20;	disciplined (2)	189:21;262:10	draft (5)
determination (2)	193:11;204:5;206:23	70:12;78:18	district (2)	144:25;177:4;
152:2;266:3	directing (4)	disclosure (1)	200:3,17	195:7;240:24;241:9
determine (5)	189:20;195:17,18,	223:18	division (5)	drafted (14)
27:7;196:3,6,15,20	18	discomfort (1)	42:4;60:4,5;88:8,10	74:6;150:22;
determined (2)	direction (5)	103:12	divorce (2)	166:12,15,17;167:9,
152:18,20	33:8;139:7;146:15;	discord (1)	24:15;28:2	25;168:18,21;169:19;
determining (2)	148:2;193:22	66:14	document (41)	177:6;240:16,25;
16:8;37:9	directions (2)	discovery (4)	16:18,20;18:5,6,15;	241:20
develop (1)	140:9;220:21	104:12,18,19;162:9	27:13;62:15,16,22;	drafting (3)
57:20	directive (8)	discretion (6)	72:1,9;73:12,17;74:7;	167:23;242:1,5
developing (1)	40:1;42:25;74:10;	125:20;127:6;	86:12,21;88:6,22;	drafts (1)
209:17	179:11;188:18;194:4;	135:3,6,8,10	89:8;90:8;91:18;	144:23
development (4)	216:8;238:16	discretionary (1)	131:17;143:7;145:10;	draftsperson (2)
57:7,17;85:21;	directives (1)	245:11	153:3;159:9;167:12,	167:7;241:16
149:12	103:19	discuss (7)	24;168:14,19,21;	dramatically (1)
devices (1)	directly (17)	131:9;143:23;	169:25;179:8,16;	172:8
, ,				
42:5	26:16;35:8;37:15;	165:17;212:24;	198:4,6;216:14;	draw (2)
devil (1)	60:18;62:6;129:18;	225:25;226:8;231:10	217:21;219:24;	161:20;269:20
101:14	132:5;133:5;140:22;	discussed (5)	240:17;269:22	drawn (4)
devise (1)	173:15;176:12;177:1;	6:23;9:2;94:11;	documentation (10)	24:5;72:22;145:17;
10:25	206:2;208:12;222:10;	145:24;226:20	64:1;78:11;114:23;	170:17
DFACS (1)	229:2;267:8	discusses (1)	134:25;138:12;154:2;	drink (5)
		<u> </u>	1	1

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 286 of 362
Bostock v. Video Deposition
Clayton County Septem Colin Slay September 10, 2021

Clayton County	Т	T	Т	September 10, 2021
21:23;209:8;212:8;	156:14;193:17;	181:2;185:9;217:3;	establish (1)	35:13;36:1;74:15;
232:25;262:24	217:19;271:25	255:8;256:13	139:17	160:1;164:9;165:17;
drinking (1)	effectively (1)	employees (19)	established (2)	173:24;174:2;210:24;
233:16	88:9	21:21;26:21;66:10;	137:10;238:22	256:4
drinks (12)	effort (5)	68:23;69:23;70:6;	et (3)	exceed (1)
21:24;123:11;	76:14,15;149:5;	83:6,8;103:25;121:9;	24:8;197:8;198:19	264:21
136:21;211:14,19,21,	168:22;220:13	134:2;157:7;164:14,	ethics (1)	exceeding (1)
22,25;233:3,4,9,21	efforts (5)	15;173:14;219:6;	124:4	88:3
drive (3)	26:13;37:15;76:11;	231:10;244:25;	evaluate (1)	exceeds (1)
37:24;63:15;201:21	77:8,9	256:17	238:18	87:18
Duck (19)	eight (3)	employment (5)	evaluation (5)	except (3)
20:22;26:14;29:21,	44:1;45:11;67:20	26:15;105:1;	87:4;90:9;91:2;	94:7;125:25;205:13
22;30:20;31:25;	either (16)	152:24;205:1;217:4	94:4;101:12	exception (1)
34:18;153:15;158:14,	7:16;39:12;75:17;	encourage (1)	evaluations (2)	87:8
16;198:18;200:19,20,	81:20;92:22;98:3;	53:13	83:7;115:11	exceptions (2)
21,25;201:18;204:23;	103:4;113:16;141:12;	encouraged (1)	even (16)	65:25;266:9
232:12;271:23	165:13;174:19;	233:22	7:23;25:7;36:1;	exchanges (1)
due (7)	181:14;192:21;	end (3)	45:22;88:1;120:18;	154:18
83:1;84:16;94:10,	225:25;241:25;271:5	36:21;174:22;	166:19;192:25;	Excuse (9)
23;121:16;152:12;	elected (1)	178:19	221:21;230:1;231:12;	29:11;81:17;
225:11	98:3	ended (5)	232:1,10;242:14;	115:17;144:12;150:2;
duly (1)	element (2)	10:22;69:13,14;	262:12;264:15	164:18;191:16;213:9;
5:7	89:14;94:9	82:16;116:5	event (33)	225:3
during (21)	elevated (1)	enforced (1)	20:9,14,16,20;21:4;	Exhibit (71)
9:4,8;44:19;58:14;	45:5	249:20	29:18,21,22;30:25;	71:22,25;80:25;
72:5;85:17,22,25;	Ellis (1)	engaged (2)	36:8,11;37:1,3,10;	81:1;85:16;86:9,10,
88:10;92:6;103:24;	49:18	114:2;164:25	83:15;110:16;114:3;	12;88:18,19,22;90:8;
118:12;121:16;	else (16)	engaging (3)	136:6;137:4;153:16;	93:8,9;96:24,24;
157:25;158:17;	8:6;50:8,9;78:19;	101:16;124:11;	171:19;174:10;	106:7,8;123:20;
196:10;201:20;	98:22;119:20;131:16;	245:6	201:12;209:24;215:7,	143:5;144:11,13,15;
226:14;237:9;247:4;	133:18;146:22;	English (1)	22;232:22;233:1,7,15,	145:8;149:23,24;
262:23	150:25;157:4;162:2,	95:6	17;262:24;267:4	168:12,24;170:9,19;
duties (9)	2,19;245:9;250:12	enough (5)	events (34)	175:18,19,25,25;
14:10;18:25;19:25;	elsewhere (1)	55:20;70:1;107:22,	8:8,9;10:1;20:18;	177:4,25;178:12;
57:12,13;168:3;	76:17	23;168:2	21:17;26:21;30:12;	179:3,21,23;194:16,
244:9,14,24	email (33)	enter (1)	31:11;32:1;34:19;	18;197:25;198:1,22;
duty (1)	39:21;69:10;80:14,	193:17	36:19;44:14;74:19;	199:15,16;200:13,14;
255:9	19,24;81:3,6;84:25;	entered (2) 180:2;223:12	76:8,16,20,23;84:7; 125:11;127:13;	202:7,8;203:25; 204:1,11,14,15;
${f E}$	85:3,13,15;93:5; 95:11,13;96:9;	entertainment (5)	147:10;149:2;155:23;	204.1,11,14,13, 205:16,17;213:4,6;
E	118:23;119:17;	248:10;249:6,10,	156:1;174:18;190:15,	215:14,17;216:11,12;
earlier (11)	154:17;198:7;200:18;	11,20	19;197:13;221:5;	221:17,18;236:14;
75:11;83:8;144:23;	202:13;204:3,4,18;	entire (5)	227:3;232:12,17,21;	238:7,11;240:16;
145:16,24;151:14;	205:19,21;213:9,16;	41:3;216:19;	255:20	269:21
229:16;232:23;	214:6;215:17;216:15;	257:18;269:17;271:2	everybody (5)	exhibits (4)
239:25;240:16;	236:13;237:19	entirety (1)	50:9;133:18;	168:7;180:9;
253:19	emails (1)	217:21	216:20,23;251:14	194:14;200:13
early (3)	39:19	entities (2)	evidence (12)	exist (2)
92:16;105:4;232:6	emphasis (2)	195:12,14	96:7;102:4;107:21,	140:18;201:3
easier (1)	226:19;227:1	entity (3)	23;120:23;134:15,25;	existed (1)
138:10	employed (10)	36:12;64:11;65:8	153:11;208:10;	246:3
Ed (1)	181:4,12,19;	entity's (1)	249:15;260:6,8	expansion (1)
5:11	182:15,21;184:19;	64:15	exact (2)	57:13
editing (1)	216:21;220:1,2,5	entry (1)	158:23;217:18	expected (1)
241:1	employee (30)	133:3	exactly (12)	29:5
education (1)	26:3;66:2;69:17;	environment (1)	39:15;46:14;57:10;	expend (2)
51:11	78:18,25;79:14;	88:11	97:6;103:3;108:23;	20:3;139:14
EEOC (10)	88:12;89:15,17;90:4;	error (1)	159:7;160:8;163:13;	expended (2)
46:6,17,23;205:23,	115:14,23;118:23;	166:14	178:17;208:23;	168:3;250:1
25;206:18,22;207:2,	119:23;120:5;129:2,	especially (3)	225:16	expenditure (34)
12;213:18	16;134:7,8;137:9;	68:19;249:21;264:5	examined (1)	18:2,2,19;26:18;
effect (6)	139:12;140:14;	essentially (2)	5:7	27:7;30:7,9;34:23;
82:21;126:16;	165:22;174:11,17;	57:18;172:11	example (10)	98:17,18;99:6,15;
. ,	. , ,		• ' '	

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 287 of 362
Bostock v. Video Deposition Septem **Colin Slay September 10, 2021**

Clayton County				September 10, 2021
111:11;126:13;	face-to-face (1)	47:5	154:3,6	72:5;86:8;88:15;91:3;
134:16;139:7;156:4;	44:19	faze (1)	filed (17)	105:12;128:7,12;
165:19;172:21,25;	facilities (1)	95:14	43:16,18;46:1,4,7,	132:7;158:19;170:8,
176:7;227:16;235:13;	71:11	FCC (13)	17,18,20;177:18;	8;178:5;190:1;
247:23;248:3,4,4,13;	facility (1)	135:18;136:1;	180:2;205:23,25;	208:17;223:21;240:3,
250:6,12;254:13;	203:17	145:16,18;148:21;	206:18,22;207:2;	5,5
261:9;262:22;263:6	fact (22)	149:2;150:11;151:7;	213:18;217:3	fiscal (4)
expenditures (25)	10:22;90:2;95:23;	156:20;157:1;161:17;	filing (1)	90:16,18;93:17;
16:11;19:15;	124:12;129:4;137:10,	195:8;197:5	46:23	264:15
102:16;118:19;126:2,	11,13;138:12;139:16;	FCCC (21)	fills (1)	fist (1)
3;138:20;139:15,23,	190:20;200:12;	119:8;128:3,14,24;	172:18	111:16
24;156:25;157:23;	218:15;226:1,8,17;	131:14;132:1,10;	final (6)	fit (1)
158:2,12;234:19;	227:2,21;233:16;	139:17;145:15,19;	61:6;144:20,25;	140:5
237:17;242:18;	256:5;259:23;265:24	146:7;147:14;156:24;	145:4,7;193:9	five (1)
243:13;245:14;246:6,	facts (7)	158:11;161:2;184:4,	finalized (2)	228:17
9;247:11;249:24;	7:17;185:24;218:5,	16;191:1;197:3,3,6	144:9;241:2	fix (1)
270:14;271:4	11;219:5,5,19	February (10)	finally (1)	159:25
expense (3)	failed (1)	179:25;180:1,1,3,	254:19	fixed (1)
122:24;123:6;133:1	45:19	11;247:3;251:5,6,7,8	finance (6)	160:6
expensed (2)	failure (1)	fee (18)	65:14;193:16;	flag (3)
247:4;249:15	29:7	17:20;24:18,20;	194:10;213:23;222:5;	101:21;102:1;131:3
expenses (10)	fair (8)	28:23,24;29:7,16;	257:9	flags (5)
32:1;119:5;137:12;	15:22;18:22;63:6;	33:13;72:10,11,15;	financial (11)	121:16;122:7,22;
195:8;210:10;250:5,	68:3,4;83:15;100:16;	73:7;149:15;169:25;	65:6;92:9;97:22;	123:4;129:1
7,25;251:23;261:18	266:5	170:7;176:7;239:17,	102:4;103:6;111:5;	flat (2)
experience (1)	fairly (2)	19	195:6;196:4;222:11;	72:11;170:7
112:25	235:22;236:1	feel (5)	223:17;257:19	fleet (1)
experienced (1)	fall (3)	35:10;106:21;	find (14)	199:11
91:20	177:2;263:3,16	120:13;129:9;206:21	99:5;153:20;155:2,	flew (1)
expert (1)	fallout (1)	feeling (2)	3,5,15;162:8;189:7;	99:8
257:20	97:21	35:3;100:9	207:18;236:5;247:18,	floated (1)
expire (1)	falls (1)	fees (22)	25;251:21;267:6	123:18
97:8	176:15	16:25;17:21;19:8;	finding (2)	floor (1)
expired (2)	familiar (2)	23:22;24:6;32:5;33:7;	65:2;223:14	112:2
97:11,17	16:18;262:16	72:23;73:8,13;74:10;	findings (4)	Florida (2)
explain (2)	family (1)	133:3;135:21,22;	131:9;143:25;	50:12,22
6:8;212:10	175:3	149:16;170:21;	152:1;227:19	focus (6)
explanation (4)	far (16)	179:11;246:16;247:2;	fine (4)	37:14;58:1,12;76:3;
98:15;99:12,14;	30:2,3;33:11,18;	248:12;249:9;253:22	6:8;15:6;136:3;	86:20;239:15
157:25	46:10;70:1;103:13;	fell (1)	140:17	focused (3)
explanations (3)	142:19;155:19;	267:2	fines (1)	31:5;64:5;67:2
99:6,21;148:19	160:23;167:13,15;	fellow (2)	19:8	focusing (1)
express (7)	184:24;211:11;	95:23;125:3	fingers (1)	11:4
13:17;22:22;	264:21;269:13	fellowship (2)	214:9	folks (6)
103:21;108:6;207:8;	fashion (1)	51:21;56:12	finish (5)	49:17;97:13;
227:21;263:13	141:15	felt (6)	33:25;34:6;40:15;	185:14;192:20;
expressed (7)	faster (1)	63:8;66:5,19;70:24;	218:7,11	264:19;265:5
78:6;101:6;103:24;	214:9	85:7;95:24	finished (2)	follow (4)
104:1;125:18;128:22;	father (2)	few (18)	34:2;53:2	78:22;156:10;
260:17	48:10;157:6	10:3;12:3;38:9,11;	fire (1)	165:16;220:21
expressing (1)	father-in-law (2)	45:23;65:18;68:23;	82:23	followed (3)
83:25	48:10,19	80:8;86:5;99:19;	fired (8)	118:1;243:17,23
expressly (7)	father's (1)	112:7;167:21;184:2;	18:6;109:9;115:3;	following (11)
30:8;33:3;206:7;	49:14	194:13;200:12;209:6;	141:3;169:21;172:4;	7:23;24:2;72:19;
207:17;227:11;	faulting (2)	215:24;266:9	217:16,17	117:12;153:10;
262:21;265:10	137:6,23	fiduciary (2)	firm (4)	170:14;180:21;198:8;
extent (2)	favorable (2)	129:20,23	24:5;40:5;72:22;	204:19;247:15,20
189:9;232:5	65:20;219:6	Field (2)	170:18	follows (3)
15	favorites (1)	60:3;271:15	firms (1)	5:8;92:4;202:21
F	165:6	figure (2)	25:4	follow-up (2)
268:13,15	Fayetteville (1)	39:17;40:23,24;	47:3;58:15;59:19;	133:13;262:24
Facebook (2) 268:13,15	favoritism (2) 67:7;69:22 Fayetteville (1)	11:18;137:5 file (5) 39:17;40:23,24;	first (24) 5:7;32:14;44:11; 47:3;58:15;59:19;	10:20;154:13 food (2) 133:13;262:2

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 288 of 362
Bostock v. Video Deposition
Clayton County Colin Slay Sentember 10, 2021

95:10;103:19;127:7, 12;135:3,5,7;145:3; 189:11 (ay (18)) 75:2;111:11,17; 113:8,24;114:3; 226:3,10,11,17,18,23; 227:17,17,22;230:9, 16;232:7 (see (2)) 101:15;167:22 (seneral (17)) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25 (senerally (15))
189:11 (ay (18) 75:2;111:11,17; 113:8,24;114:3; 226:3,10,11,17,18,23; 227:17,17,22;230:9, 16;232:7 (see (2) 101:15;167:22 (seneral (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
(ay (18) 75:2;111:11,17; 113:8,24;114:3; 226:3,10,11,17,18,23; 227:17,17,22;230:9, 16;232:7 (see (2) 101:15;167:22 (seneral (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
75:2;111:11,17; 113:8,24;114:3; 226:3,10,11,17,18,23; 227:17,17,22;230:9, 16;232:7 (ee (2) 101:15;167:22 (eneral (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
75:2;111:11,17; 113:8,24;114:3; 226:3,10,11,17,18,23; 227:17,17,22;230:9, 16;232:7 (ee (2) 101:15;167:22 (eneral (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
226:3,10,11,17,18,23; 227:17,17,22;230:9, 16;232:7 gee (2) 101:15;167:22 general (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
226:3,10,11,17,18,23; 227:17,17,22;230:9, 16;232:7 ge (2) 101:15;167:22 general (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
16;232:7 gee (2) 101:15;167:22 general (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
gee (2) 101:15;167:22 general (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
101:15;167:22 general (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
general (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
general (17) 30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
30:25;31:22;32:4, 16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
16;34:10,13,24;35:2, 3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
3,13;69:21;71:6;79:7; 113:19;127:16; 244:15;253:25
113:19;127:16; 244:15;253:25
244:15;253:25
7:16;63:7;65:25;
87:6;99:5;117:25;
164:4;257:1,6,16;
258:20;262:2;266:5,
6,21
generated (3)
166:3;253:22;
270:11
generation (1)
42:11
genesis (1)
62:23
Georgia (9)
10:13;17:4;47:6;
51:14;64:19;72:3;
73:2;170:23;175:22
Gerald (119)
5:14;13:14,15,15;
14:5,9;17:1;23:12;
24:7;26:2;40:2;41:15;
58:7;60:18;61:10,17,
20;62:17;63:17;64:7;
66:4;69:9,17;70:12;
72:24;74:2;77:22,24;
78:12;82:17;85:13,
24;86:2,14;88:16;
90:9;91:6;98:10;
100:10;102:21;
103:22,25;106:20;
108:21;113:7;114:2;
116:12;119:1;120:21;
123:7,22;124:7,9,12;
125:10;130:20;135:3;
138:24;147:22;150:3;
154:9;155:11;157:20;
160:5;161:4;168:16;
169:20;172:4,18;
183:24;184:13,23;
186:24;189:10,20;
196:3;200:23:202:13:
196:3;200:23;202:13; 204:21,25,25;206:18,
204:21,25,25;206:18,
204:21,25,25;206:18, 22;207:2,6,10;217:3,
204:21,25,25;206:18, 22;207:2,6,10;217:3, 15;221:23;225:6;
204:21,25,25;206:18, 22;207:2,6,10;217:3,

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 289 of 362
Bostock v. Video Deposition Septem **Colin Slay September 10, 2021**

Clayton County				September 10, 2021
235:18,22;236:7,7,11;	Gossett (23)	guess (17)	127:10;158:23	highlighted (1)
237:7;240:16;241:25;	13:20;14:4;15:9;	29:20;30:25;75:21;	happens (3)	111:12
245:5;250:11;252:7;	114:17,24;116:4,15;	87:12;97:17;100:13;	166:8,10,11	highlighting (1)
254:11;256:16,25;	118:16;153:21;	128:22;147:20;	happy (3)	219:4
259:15,16,25;261:13;	154:17;161:21;	177:17;180:10;	95:24;165:18;	highlights (1)
263:19;267:7,19	162:13;180:23;184:1;	207:25;210:5;218:20;	266:15	113:12
Gerald's (42)	185:15;194:20;	223:19;224:25;	hard (3)	HILL (29)
12:11;15:11;44:15;	195:18,21;197:19;	255:22;256:2	39:15;106:2;135:14	15:25;17:7;23:1;
61:4;65:16;77:8;87:1;	203:6;204:6;205:5;	guidance (2)	hated (1)	27:4;28:11;32:9;
95:15;99:6;104:5,24;	223:18	19:18,20	45:14	109:22;128:9;130:15;
109:2,21;111:11;	governance (1)	guidelines (7)	Hawa (2)	132:4,6;138:14;
114:24;128:21;130:6;	123:2	123:21;169:3,15;	183:13;186:20	167:3,16;168:9,11;
148:6;151:21;158:18;	governed (1)	249:19,25;260:13;	head (3)	171:22;180:4;207:14;
159:1,2,12;160:6;	27:18	263:12	6:9;59:6;60:8	213:10;218:7;219:9;
161:9;185:24;188:4;	governing (2)	guns (1)	headed (1)	220:16;221:1;255:23;
189:2;190:11,15,15,	35:11;197:2	89:25	146:16	260:5;269:10;272:12,
19;191:14;193:5;	government (15)	guy (6)	heading (1)	18
194:20;220:7;225:25;	7:4;8:7,17;22:10,	69:7;130:6;185:9;	148:1	himself (5)
227:4;257:13;265:17;	23;27:23;64:9,11,24;	255:19;256:17;262:6	hear (3)	66:17;138:24;
267:2,24	65:8;124:20;141:15;	guys (1)	53:10;113:21;	254:7;256:11;258:6
		132:24	271:22	
get-go (1)	175:12;219:6,7	132:24		hiring (1)
253:9	grace (1)	TT	heard (4)	265:7
gets (2)	91:24	H	13:10;51:24;217:1;	historic (2)
171:4;259:9	Graduate (2)	1 1876	232:9	250:18,19
gift (1)	51:9;54:24	half (6)	hearing (3)	history (1)
31:7	graduated (1)	24:17;39:3;233:10,	46:24;183:2,7	200:5
Gigi's (1)	54:14	11,12;261:1	heart (1)	hit (2)
10:8	grand (1)	hand (5)	113:4	111:15;213:25
Ginger (3)	107:23	9:9;99:3;150:16,17;	heavily (1)	hold (6)
185:2;191:11;	Graniella (3)	179:22	191:3	8:4;55:6;56:15,19;
192:13	157:8;182:17;	handed (7)	held (19)	95:17;175:2
girls (1)	186:10	146:6;150:14,18,	22:4,6;27:24;30:22;	holder (2)
11:13	grant (11)	19;151:11,12,15	39:17;60:17;71:21;	131:14;132:2
gist (1)	57:18;64:19;65:2,	Handful (1)	85:19;96:19;97:11;	holiday (1)
119:20	11;69:12;82:16;97:2,	211:10	134:5;148:15;175:8;	201:20
giveaway (1)	2,4,10,12	handle (5)	189:16;193:13;	home (11)
31:7	grants (5)	70:21;115:9;	195:15;199:22;	10:10;11:1,2,5,6,
given (7)	60:11;64:10,23;	189:21;190:5,12	253:20;261:20	13;47:3;115:11;
27:12;57:3;74:24;	65:5;97:7	handled (8)	help (2)	158:18;159:1,2
92:23;117:23;142:19;	granular (2)	65:13;104:3;	76:7;150:24	honest (1)
269:13	45:11;84:3	116:25;152:14;	helped (2)	169:1
gives (2)	great (1)	242:18;243:3,9;259:5	10:25;31:4	honestly (7)
217:7;258:25	208:2	handling (10)	helping (1)	12:17;45:24;63:24;
giving (2)	greatly (2)	11:8;15:21;16:25;	158:13	84:2;131:3;211:9;
22:13;187:9	119:6;128:13	65:2;66:16;121:5,7;	Here's (4)	225:19
glad (1)	grew (1)	134:11;169:16;242:6	14:19;98:18,18;	honesty (1)
207:18	51:5	Haney (1)	129:19	84:1
glance (1)	group (2)	203:11	hesitance (1)	Honey (5)
225:21	10:10;216:17	hang (3)	203:17	75:3;124:6;126:13;
glass (1)	grown (1)	137:15;139:3,22	Hey (8)	136:13,18
111:25	251:16	happen (9)	9:10;34:5;36:22;	honorable (2)
goes (3)	guard (1)	25:9;34:19;57:8;	67:13;99:15;188:11;	166:24;167:1
170:21;182:19;	180:14	84:21;97:20;133:15;	190:4;235:25	hope (1)
238:24	guardian (32)	227:25;231:2;244:10	hide (2)	37:2
Good (19)	23:10,25;24:11,12;	happened (18)	129:2;187:6	hors (1)
5:11,13;63:13;66:5;	28:3;29:6,9,12;32:21,	9:5;25:13;41:25;	high (2)	136:21
68:7;92:6;94:11;95:3;	25;33:3,4;72:17;	56:23;68:9;85:4;	51:7,8	hospital (1)
105:20;112:22;113:4;	74:20;75:7,16,21;	97:19;104:7;106:5;	higher (1)	51:5
142:2;214:19;245:3;	76:1;114:19;164:21;	111:8;126:23;160:18;	88:12	Hot (1)
258:4,15;259:2;	170:12;174:6;182:11;	162:11;174:24;	highest (2)	248:19
272:9,13	195:10;239:16;	191:20;216:4;251:15;	66:1;87:9	hotel (1)
gosh (1)	245:20;246:25;264:5,	262:4	highlight (1)	210:12
161:8	7;266:4,7;267:14	happening (2)	250:3	Hotlanta (9)
		_		

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 290 of 362

Bostock v. Video Deposition

Septen Colin Slay September 10, 2021

Clayton County				September 10, 2021
197:7,15,21;	implies (1)	incurred (1)	174:15	28:4;29:1
	53:5	261:19		
248:20;249:1;261:2,			Instagram (2)	Internal (14)
6,25;270:19	important (2)	indeed (1)	268:13,15	13:7;40:1;84:20;
hour (2)	148:24;163:17	94:6	instance (10)	96:15;121:3,15;
264:20,21	imposed (1)	independent (4)	9:2;21:17,20;31:25;	122:18;127:23;131:8;
hours (7)	91:23	85:4;96:11;141:22,	34:23;130:19;180:13;	214:22;215:18,19;
39:2;72:5;151:15;	imprinted (1)	23	207:18;235:15;	238:18;241:19
264:6,7,16,17	245:18	independently (1)	257:22	interned (1)
House (6)	improper (13)	159:21	instances (1)	54:16
10:9;159:12,14,15;	21:9,12;26:20;	in-depth (2)	11:12	interpersonal (1)
160:6;209:6	30:15;65:2;114:3;	160:10;236:17	instead (2)	91:10
housed (4)	139:2,3;188:14;	indicted (1)	172:15;193:23	interrupt (1)
11:25;195:25;	249:24;253:12;255:1,	207:11	Institute (2)	29:3
203:16;250:18	10	indictment (3)	52:1,7	intervention (2)
HR (1)	improperly (1)	107:15;207:6;	instruct (1)	91:23;202:18
143:22	267:19	208:11	40:6	interview (5)
HSL (4)	impropriety (2)	Indirect (2)	instructed (5)	121:17;132:10;
248:13,18,23;270:6	117:19;255:11	234:17,18	92:12;122:14;	134:20;217:11,14
Hudson (1)	improve (1)	individual (2)	192:17;217:24;	interviewed (5)
182:19	158:18	124:8,9	219:10	121:13;192:8;
huh-uh (1)	inability (1)	individuals (6)	instructing (3)	231:5;237:9,13
6:9	29:3	67:24;73:18;76:6;	40:8,9;43:2	into (54)
human (2)	inadvertent (1)	78:4;202:16;263:24	instruction (4)	7:22;8:1;19:12;
12:24;143:21	33:23	inference (1)	92:15;114:21;	32:5;38:1;42:14;56:1;
humidor (1)	inappropriate (4)	190:11	117:23;237:5	59:22;68:18;69:24;
212:18				
	18:2;34:25;99:9;	influence (5)	instructions (3)	76:14;77:4;84:20;
hundred (3)	175:13	220:13,14,20;	70:21;114:16;147:2	85:9;116:5;119:12,
42:9;189:17;249:10	inbox (1)	221:6,10	insufficient (2)	18;120:13;121:7,21;
hypotheticals (1)	46:16	influencing (1)	152:19,20	128:2,17,23;129:10;
173:6	Inc (8)	217:23	intake (1)	131:4;171:11,21,25;
	17:1;24:7;72:24;	inform (1)	105:11	172:5;176:7;177:7;
I /3:6	17:1;24:7;72:24; 204:20,23;239:5,7;	inform (1) 207:2	105:11 intakes (1)	172:5;176:7;177:7; 182:25;188:1;196:9,
I	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19	inform (1) 207:2 informal (2)	105:11 intakes (1) 200:19	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13;
I idea (7)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2)	inform (1) 207:2 informal (2) 93:18;235:24	105:11 intakes (1) 200:19 integrity (1)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13;
I idea (7) 109:24;125:13;	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17	inform (1) 207:2 informal (2) 93:18;235:24 Information (18)	105:11 intakes (1) 200:19 integrity (1) 112:24	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20;
I idea (7) 109:24;125:13; 207:7;251:2;254:14;	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19,	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4;
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10;	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9,
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5,	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2;
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17;	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14;	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24;	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16;	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1)
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1)
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21;	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1)
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1)
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2)
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2;	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1;	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6)
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3;
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3
idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19 imagine (2) 13:15;220:11	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21 incoming (1) 225:10	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1) 248:23 initiated (1)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25 interactions (3) 68:1,13;83:6	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24 investigating (2)
idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19 imagine (2) 13:15;220:11 immediately (2)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21 incoming (1) 225:10 incompetence (2)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1) 248:23 initiated (1) 249:20	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25 interactions (3) 68:1,13;83:6 interchangeably (1)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24 investigating (2) 7:19;120:13
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19 imagine (2) 13:15;220:11 immediately (2) 18:13;258:8	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21 incoming (1) 225:10 incompetence (2) 137:8;152:25	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1) 248:23 initiated (1)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25 interactions (3) 68:1,13;83:6 interchangeably (1) 222:18	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24 investigating (2) 7:19;120:13 investigation (28)
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19 imagine (2) 13:15;220:11 immediately (2) 18:13;258:8 imminent (1)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21 incoming (1) 225:10 incompetence (2) 137:8;152:25 inconsistencies (3)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1) 248:23 initiated (1) 249:20 initiation (1) 246:8	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25 interactions (3) 68:1,13;83:6 interchangeably (1) 222:18 interest (12)	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24 investigating (2) 7:19;120:13 investigation (28) 7:22;38:24;72:13,
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19 imagine (2) 13:15;220:11 immediately (2) 18:13;258:8 imminent (1) 151:10	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21 incoming (1) 225:10 incompetence (2) 137:8;152:25 inconsistencies (3) 131:10,23;267:12	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1) 248:23 initiated (1) 249:20 initiation (1) 246:8 initiative (3)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25 interactions (3) 68:1,13;83:6 interchangeably (1) 222:18 interest (12) 14:16;28:25;63:5;	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24 investigating (2) 7:19;120:13 investigation (28) 7:22;38:24;72:13, 14;85:1;107:9,14;
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19 imagine (2) 13:15;220:11 immediately (2) 18:13;258:8 imminent (1) 151:10 impact (1)	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21 incoming (1) 225:10 incompetence (2) 137:8;152:25 inconsistencies (3) 131:10,23;267:12 inconsistent (1)	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1) 248:23 initiated (1) 249:20 initiation (1) 246:8 initiative (3) 53:9,10;56:7	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25 interactions (3) 68:1,13;83:6 interchangeably (1) 222:18 interest (12) 14:16;28:25;63:5; 123:16,22;124:4,15,	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24 investigating (2) 7:19;120:13 investigation (28) 7:22;38:24;72:13, 14;85:1;107:9,14; 108:10;117:7,12,16;
I idea (7) 109:24;125:13; 207:7;251:2;254:14; 257:5;264:11 Ideally (1) 244:24 identify (1) 71:25 II (1) 72:9 III (2) 150:3;221:24 illegal (3) 219:17,18;259:3 illegitimate (1) 156:4 image (1) 260:19 imagine (2) 13:15;220:11 immediately (2) 18:13;258:8 imminent (1) 151:10	17:1;24:7;72:24; 204:20,23;239:5,7; 245:19 incident (2) 10:2;78:17 incidents (1) 11:6 include (7) 24:2;72:19;162:17; 170:14;245:15,16; 247:13 included (3) 256:9;261:19;263:6 includes (2) 71:3;164:24 including (6) 67:17;130:2; 153:13;154:22;171:1; 241:1 income (2) 16:12;225:21 incoming (1) 225:10 incompetence (2) 137:8;152:25 inconsistencies (3) 131:10,23;267:12	inform (1) 207:2 informal (2) 93:18;235:24 Information (18) 42:3;62:7,13;63:19, 25;85:7;92:9;122:10; 154:9;180:21;197:5, 6,9,14;198:9;202:14; 204:8;208:12 informed (2) 110:5,17 informing (1) 40:9 inhouse (1) 222:7 initial (2) 118:13;241:9 initialing (1) 195:1 initials (1) 248:23 initiated (1) 249:20 initiation (1) 246:8 initiative (3)	105:11 intakes (1) 200:19 integrity (1) 112:24 intelligent (3) 130:6,13;139:13 intent (4) 147:2;152:24; 220:20,21 intention (3) 37:7;188:8,17 intentional (4) 156:23;157:21; 158:10;161:1 intentions (3) 220:23;221:2;263:4 Interact (1) 80:21 interaction (3) 67:12;229:4;230:25 interactions (3) 68:1,13;83:6 interchangeably (1) 222:18 interest (12) 14:16;28:25;63:5;	172:5;176:7;177:7; 182:25;188:1;196:9, 25;201:6;219:13; 220:25;222:13; 223:12;225:15,20; 234:10,13;235:4; 236:15;237:6;251:9, 12,13;252:24;261:2; 264:6;265:14 intro (1) 232:13 introduced (1) 232:14 introduction (1) 238:13 inventoried (2) 153:19;154:20 investigate (6) 114:16,22;116:3; 117:17;152:10;256:3 investigated (3) 95:17,18;117:24 investigating (2) 7:19;120:13 investigation (28) 7:22;38:24;72:13, 14;85:1;107:9,14;

interested (1)

59:19

interests (2)

5;180:22;184:24;

202:15;205:22;206:9,

193:11;194:15;

input (2)

177:7;237:6

in-service (1)

53:20

implemented (1)

197:2

increase (1)

267:15

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 291 of 362
Bostock v. Video Deposition Septem **Colin Slay September 10, 2021**

Clayton County			1	September 10, 2021
19.212.19.256.7	00.12.122.25.	160.10 12 17 17 10	209:20	106.4 12.205.11.
18;213:18;256:7	99:12;122:25;	160:10,12,17,17,19,		196:4,12;205:11;
Investigations (3)	123:7;131:12,24;	22;180:22;182:5;	Judicial (1)	222:8;234:20;253:21
222:13,16;223:3	155:9	185:15;186:8;194:23;	73:20	key (1)
investigative (3)	_	206:5,24;207:1;	July (4)	87:16
39:16;40:23;207:24	J	213:20,21;221:24;	90:18,19,21;204:21	kids (6)
investigator (12)		224:10,14,16,17,19;	June (24)	31:16;37:13;53:20;
39:10;106:25;	Janice (3)	226:14;227:6,10,11,	43:22;90:16,16,18,	124:21;182:25;265:3
107:3,5,9,11;151:25;	81:7,8;82:8	14,21;228:4,19;	24,25;106:10;114:11;	Kimberly (4)
195:4;197:18;198:11;	January (6)	229:15;231:23	150:2,8,9;151:11,11,	181:6;183:8;186:3,
206:22;207:2	54:16;81:7;118:22;	Johnson's (9)	15;152:19,23;153:17;	16
investigators (1)	202:12,21;252:23	58:22;81:9;82:12;	194:19;202:22;	kind (21)
202:11	JD (1)	89:1;102:18;103:15;	214:21,24;215:9;	11:13,20;21:7;31:7;
	56:3			
invite (1)		207:5;224:10;237:4	216:15;224:21	34:21;52:20;60:7;
175:3	JDAI (7)	joint (1)	jurisdictions (3)	67:14;68:21;69:24;
involuntarily (2)	53:11,22,24;56:2,	114:19	59:12;209:17;	108:11;114:7;130:3;
181:15,22	14;60:6;222:2	jointly (1)	211:12	182:2;209:10;235:25;
involved (32)	Jeff (2)	188:5	jury (1)	236:16;258:22;
11:8;28:19;31:12;	201:10;236:24	Jonesboro (6)	107:24	265:20,25;267:20
54:8;61:14;63:19,21;	Jefferson (1)	17:4;47:6,10;49:6,	justice (8)	kinds (2)
70:4;94:13;102:14;	50:6	6;73:2	51:16;53:8;60:4,5,	45:1;130:1
115:10;125:6;129:17;	jersey (1)	Journal-Constitution (2)	7;64:12;209:17;	knew (7)
130:1;133:1;134:9;	75:5	217:6;218:19	210:25	8:11;82:11;156:7;
137:17;158:13;	jerseys (1)	Judge (135)	Juvenile (78)	192:20;193:2;246:3;
164:17,20,22;165:2,	271:13	7:6,15,21;10:18,24;	17:3;39:9;40:4;	258:4
13;166:17;173:7;	job (23)	12:11;20:15;26:6;	53:8,9,14;54:7,20,25;	knowledge (28)
175:10;179:15;			55:7;56:6,20;57:1;	0 \ ′
	13:25;14:9;57:12,	29:13;44:13;60:23,		30:18,21;33:14;
188:22;191:3;241:6;	13,14;69:11,15;	25;61:1,2,3,6,9,15,19;	58:19;59:4;60:7;	34:14;62:20;111:4;
244:20;267:23	82:23;94:11;95:20,	73:19,24;74:1;	64:25;65:1;73:1,24;	113:24;125:15;
involvement (4)	23;97:1,15;98:6;	105:17,19;106:23;	74:3;94:19;96:17,20;	139:20,25;185:13;
107:4;159:22;	110:23;115:6;164:23;	108:3,4,19;109:5,10,	106:3;114:20;115:6,	191:25;192:18;193:2;
234:11,14	165:23;220:7;228:11;	19;110:15;111:10;	16,21,22,24;117:10;	202:24;203:22;
involving (3)	265:3,8;266:16	113:6;122:9;127:20,	128:4;133:17;140:23;	219:25;220:6;223:5;
68:22;202:15;217:2	jobs (5)	21;129:14;143:10,12,	146:8;153:19;154:21;	225:6,8;241:15,20;
iPhone (6)	55:2;85:18,21;	14,20,24;144:6,16,18;	167:11;170:22;171:8,	242:5,7;243:16;
42:10,22;44:5,11;	266:8,10	145:19,23;146:4;	12,17,19,21,25;172:6,	254:22;268:5
46:4;206:15	John (22)	147:20;148:4,15;	14,14;175:9,23;	knows (3)
iPhones (3)	7:21;10:18,18;	150:4;151:3,8,24;	176:14,22;179:7,7,12;	92:4;139:13;189:10
42:23;45:20,22		150:4,151:5,6,24,	181:2,4,12;182:6,15;	Kristin (1)
	58:17;60:22;63:22;			
ire (1)	81:23;82:2;89:1;	166:16,21,23,24;	183:3;193:12,15;	48:17
84:15	106:23;122:5,9,14;	167:10,11;175:8;	194:24;210:24;	τ.
issue (21)	148:16;150:3,18;	176:25;177:4,10;	211:18;216:19,20;	L
11:3;24:15;64:2;	186:25;194:23;	178:3,5,9,10,18,18,	217:2,21;218:23,24;	
104:22,23;105:17;	221:24;229:14;237:4,	21;179:3,4,5,6,7,9,19;	219:21;221:24;	labeling (1)
124:23;125:8;134:17;	16	180:17,17,22;183:2,7;	238:15;239:20;244:6	195:5
135:16;138:8;139:18;	Johnson (103)	193:11,22;202:18;	juveniles (1)	laboring (1)
141:5;173:23;182:4;	7:21;8:5,18;39:12,	207:10,17;208:14,16;	53:17	6:19
197:21;236:7;246:2;	14;40:4,22;43:9;	209:1,4,10;210:3,17,	30.11	lack (15)
252:3,9,10	44:13;58:17;59:15;	18,18;211:8;212:20,	K	19:17,19,23,25;
issued (10)	60:22;61:12,15;62:4,	25;214:23;215:19;	17	83:1;84:1;123:1;
			Vothoring (1)	
29:13;40:25;44:11;	7;63:1,22;70:3,7;	216:7;217:12,14;	Katherine (1)	140:12;157:24;169:3,
119:25;127:14;137:7,	78:21;79:13,19;	218:1;221:4;223:15;	47:20	6,15;245:7;267:11,13
24;138:13;199:4;	81:16,17,18,23;82:2,	224:8;225:24;227:7;	keep (5)	lady (1)
254:19	7,8;89:4,7,20;92:12;	229:11,14;230:6,12;	145:23;155:13;	112:16
issues (9)	93:1;98:24;99:1,16,	231:5,9,17,20;233:7,	165:18;231:11;	language (3)
10:12,14;44:18;	20;103:2,5,7,10;	10,21;237:5;238:15;	254:17	111:14;153:2;
66:9;78:2;84:10;	104:4;114:16;117:12;	240:1,2,21;241:1,10,	keeping (9)	226:12
91:25;103:25;172:24	118:23;119:11;121:6,	10	94:12;125:18;	lapse (1)
item (6)	14,20,22;122:2,21;	judges (12)	131:11,23;138:4,6,19;	225:4
87:17;155:16;	127:20,22,25;128:16,	177:12,15,19;	153:12;164:24	large (2)
234:23;235:10,12,13	22;129:9;130:19;	178:3;179:6,15;	Kenneth (1)	12:16;68:21
		183:3;216:22;222:8,	49:21	largely (1)
itemize (1)	131:7;143:9,20;			
74:13	144:1;146:24,25;	10;263:5;266:14	kept (9)	93:23
items (6)	150:3,16,23;151:2;	judge's (1)	30:18,18;35:5;	larger (2)
		1		

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 292 of 362
Bostock v. Video Deposition Colin Slay September 10, 2021

Clayton County		· · · · · · · · · · · · · · · · · · ·		September 10, 2021
262:1;265:24	12:18;147:1;	49:18	75:4;271:13,13;	19;165:2,8,9,17,22;
largest (2)	163:21;181:15,21;	line (16)	272:3,6	173:9;174:4;197:12;
265:19,20	189:25;190:4;224:23;	46:25;85:18;99:11;	long (7)	247:14
lash (1)	267:11	114:12,12;118:7;	38:25;47:14;55:6;	luncheon (5)
95:24	leaving (1)	139:18;147:11;	127:10;173:1;214:21;	31:6;142:10;
last (6)	60:8	234:23;235:10,12,13;	238:9	252:24;253:2;254:8
49:24;107:8;	led (4)	238:8;255:15,16;	longer (9)	lunches (2)
128:11;157:6;264:15;	62:8,23;157:20;	257:22	41:19;142:5;176:5,	164:5;173:24
268:20	230:6	LinkedIn (2)	6,23;184:1;220:1;	lying (1)
late (5)	ledgered (1)	268:13,15	224:17;268:11	127:2
92:18;94:10,14;	235:5	list (12)	long-held (1)	127.2
118:22;121:2	left (5)	49:15;180:19,22;	27:15	M
later (1)	11:13,15;220:8;	181:6;182:5;185:14;	long-term (1)	112
16:23	224:22;260:19	192:16,17;195:12;	11:20	maintained (3)
Lawson (4)	left-hand (1)	198:8,17;246:9	look (33)	196:3;205:14;240:8
106:25;108:4;	270:3	listed (2)	16:23;62:15;65:24;	maintenance (1)
151:25;152:1	legal (2)	185:13;243:1	72:8;83:4,11,13,14;	234:12
lawsuit (7)	22:13;35:18	listened (1)	85:8;86:5;87:6;88:18;	major (2)
43:16,18;46:18,20;	legitimate (4)	63:9	90:7;92:25;118:11,	186:13;227:1
216:16;223:24;224:3	119:13;128:18;	listing (2)	19;119:18;121:7,21;	majority (2)
lawyer (2)	165:2,19	197:4,8	122:19;128:2,23;	44:18;91:9
167:20,24	Leslie (6)	litem (23)	130:2,11;131:5,19;	major's (1)
lawyerly (1)	13:5;15:12;63:22;	23:10,25;24:11,12;	139:6;169:24;196:25;	95:7
167:23	131:8;143:22;237:11	28:3;29:6,12;32:21,	204:5;212:13;238:2,4	maker (5)
lawyers (4)	less (7)	25;33:3,4;72:17;	looked (9)	61:4,6;137:16;
6:24;7:14;8:7;	6:21;160:13;	74:21;75:22;114:19;	65:15,19;101:4;	151:3,3
38:17	177:14;223:9;271:3,	164:21;170:12;	108:15;118:3;196:9;	makes (2)
layoff (1)	6,7	182:11;195:10;	236:14;238:21,24	6:4;53:24
69:11	letter (15)	239:16;245:20;264:7;	looking (16)	making (6)
lead (3)	40:5;42:6;43:10;	267:14	57:18;81:22;85:11;	60:8;91:10;108:14;
36:12,15;37:10	46:15;147:1;150:2,5,	Litem-Bank (1)	88:5;90:10;91:17;	131:2;135:11;253:15
leader (3)	5,14,16,18,19,22;	246:25	100:4;114:6,14;	man (6)
68:5;69:3;88:8	151:11;153:3	litems (8)	119:12;124:21;	95:22;130:13;
leaders (1)	level (9)	29:9;75:8,16;76:1;	128:17;143:4,7;	166:24;167:1;260:8;
53:23	70:25;78:23;79:2,3;	174:6;264:5;266:4,7	180:4;269:25	264:6
Leadership (8)	120:17;125:19,21;	litigation (4)	looks (18)	managed (1)
51:23,24;52:7;53:6,	127:4;179:19	39:22,25;40:9;	66:20;87:7;94:1;	182:13
6,23;69:2;91:21	leveled (1)	217:5	183:10;198:10;200:1,	management (4)
leading (7)	161:3	little (19)	3;202:10;205:20;	16:7;66:9;87:16;
8:8;44:15;185:24;	liaison (1)	7:10;45:4;47:2;	207:21;214:5,7;	257:19
190:15,19;225:24;	246:13	50:25;55:19;71:9;	223:7;225:13;248:8,	manager (1)
227:3	liar (3)	77:21;80:6;90:12;	12;249:7;259:2	95:25
leads (3)	112:16;230:5;	95:24;120:6;134:15;	loss (1)	managing (3)
156:21,22;161:18	261:14	142:5;215:17;225:3;	267:15	158:1;235:18;
league (17)	liberty (1)	239:3;246:5;267:5;	lost (6)	249:21
36:8;75:13;136:8;	54:10	269:1	69:11,14;95:19,23;	many (11)
197:7,16,22;226:18, 21;230:16;248:20,20;	lies (1) 133:9	live (9) 47:7;48:6,16,18,23;	97:15,15 lot (10)	124:18;162:21;
249:1;261:2,6;262:2;	lieu (2)	49:3,10,14;50:22	39:14;76:19;100:7;	177:9;178:17;211:7; 217:1;220:2;249:12,
263:3;270:19	181:24;183:7	lived (1)	137:12;162:5;198:23;	13;264:11;272:7
leagues (1)	life (1)	47:14	219:13;261:22;264:5;	13;204:11;272:7 March (4)
263:9	69:24	lives (8)	266:16	121:3;177:17,18;
learn (2)	light (1)	48:19,25;49:5,19,	lots (2)	180:10
102:2;155:11	137:2	21,25;50:2,6	242:12;257:8	marches (1)
learned (2)	liked (1)	living (2)	loved (1)	112:8
205:25;208:13	242:21	11:5;262:13	45:15	Marietta (2)
least (14)	likelihood (2)	load (1)	Lovejoy (4)	37:17,22
20:19;21:9;58:7;	145:22;257:24	216:6	10:13,15,21,23	marked (13)
64:10;95:13;113:3;	likely (2)	locate (1)	lowered (1)	71:24;86:8;93:8;
119:16;165:13;203:1;	37:10;217:1	156:8	94:10	106:6;144:15;149:23;
212:22;222:7;223:8;	limited (2)	located (3)	lunch (18)	175:18;197:25;
235:23;263:16	118:15;244:25	10:12;155:9;249:14	124:9,10,13;142:5;	199:14;202:6;205:15;
leave (9)	110.12,477.43	10.12,100.7,477.17	121.7,10,13,172.3,	
	Linda (1)	logo (5)	162:16,18;164:6,16,	215:16;216:11

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 293 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County	Т	T	T	September 10, 2021
marketing (1)	124.17 10 25.122.15.	4,204,21,24,220,12,	63:22,25;121:14;	15;145:11;150:6;
	124:17,19,25;133:15;	4;204:21,24;229:13;		
76:11	211:13;247:16,22,25;	235:21,21;247:14	122:4,21;125:18;	169:24;180:6;185:11;
marks (2)	248:2,10;249:6,9,11,	meets (2)	131:8;237:11,12	251:5
66:1,25	19	91:15;133:18	message (1)	minutes (5)
Married (2)	mean (56)	member (16)	41:8	86:6;197:4;204:20,
47:16,17	7:2,2,5;8:10;36:25;	126:18;132:21;	messages (6)	22;205:7
material (1)	37:7,10;45:2,3;52:14;	184:4,12,17;185:5;	39:19,20;41:14,17;	misappropriated (1)
191:25	53:1;61:10;65:24,25;	191:1;192:14;228:7,	43:2,10	230:8
materials (1)	68:22;74:11;76:22;	7;234:1,3;261:5;	met (12)	misappropriation (1)
158:16	77:14;80:20;83:4,18;	262:9,10,20	12:24;38:16;131:8;	217:17
math (1)	84:19;85:6;102:24;	members (18)	143:21;145:20;148:4;	mischaracterization (1)
95:6	103:9;113:17;124:6;	134:21;156:20,24;	151:8,24;186:25;	219:22
Mathis (3)	137:5;141:8;146:19;	158:11;161:2,18;	232:13;235:22;	mischaracterizing (2)
40:7;42:7;46:15	149:10;155:22;	162:16;164:10,10,16,	265:18	260:5,7
Matt (1)	159:20,24;161:16;	17,19;165:12;197:6;	method (1)	misconduct (1)
143:10	163:1;164:10;176:12;	203:10;242:17;	259:22	101:16
matter (18)	184:25;189:16,23;	245:16;261:8	methodology (5)	miserably (1)
8:18;44:14;86:20;	190:9;192:4,7;	memo (13)	77:13,15,18,19;	45:19
108:18;109:20;119:6,	200:23;208:19;210:1;	39:9,13;42:6;69:7;	238:25	mislabel (1)
13;128:2,13,17,23;	211:11;228:22,24;	70:19;84:14;149:10;	metro (5)	191:7
129:5;130:18;140:23;	229:4;230:14;231:3;	151:19;154:11;	49:14;50:6,21;	misleading (1)
212:23;223:16;	235:23;265:5;266:11	198:22;204:17;	52:11;174:15	161:9
231:10;252:16	meaning (1)	223:17;224:15	metropolitan (5)	misled (4)
matters (2)	223:19	memoranda (1)	48:7,24;49:3,10;	156:24;157:22;
153:12;254:18	means (11)	156:14	50:14	158:11;161:1
Matthew (3)	24:3;72:20;124:13;	memorandum (26)	Michael (2)	missed (2)
73:19;178:8,9	170:15;207:25;	15:19;16:16;72:2;	38:20;39:1	94:10,15
may (57)	216:22;244:13,15;	93:11,12;106:10,21;	micromanagement (1)	missing (15)
28:8;41:21;43:3,7;	248:15;249:2;272:19	114:11;116:3;117:9;	67:8	101:1,9,15;122:24;
44:21;45:25;46:1,9,	meant (4)	122:23;127:21;128:8;	microphone (1)	152:15;153:13,18,24;
13;48:1;64:13;78:3;	169:21;207:25;	137:5;143:9;149:10;	71:13	154:21;196:14,17,21;
80:8;109:16;113:10;	214:3,4	150:9;180:19;185:9,	middle (1)	202:19,21;260:18
127:21;131:7;140:6;	measures (1)	18;193:10;194:18;	33:22	mission (9)
142:2;144:2;145:12,	95:2	199:18;200:16;	midst (1)	11:17;22:22;27:24;
13,20;147:8,13,23;	mechanism (1)	221:21;238:23	193:11	35:18;36:2;140:21,
150:10;151:8,9,17,24;	33:17	memory (3)	Midtown (1)	22;246:10;250:9
156:17;157:14;161:4;	mechanisms (2)	6:21;10:1;14:20	113:21	misspent (1)
	193:14,20	memos (1)	midyear (1)	120:10
162:8;165:18;172:11;		39:11		
186:11;190:3,4;	media (10)		93:20	mistake (1)
191:2,6,20;202:21;	109:16,21;110:3,4,	Memphis (1)	might (17)	25:10
207:24,25;230:15;	5;217:8;268:6,7,9,12	52:15	36:4,9;96:4;123:21;	mistype (1)
233:15;242:20,22;	medication (1)	mention (8)	135:18;163:3,24;	191:6
245:15;254:21;255:4,	6:20	33:20;151:19;	174:14;192:18;216:2;	misunderstanding (1)
16;257:12;269:1;	meet (7)	181:17;190:25;	219:1,2;221:9;	247:19
270:11	38:20,25;106:24;	199:25;226:7,16;	232:12;236:9;242:21;	misuse (6)
maybe (27)	207:22;209:1;212:20;	227:21	252:12	156:23;157:21;
9:23,23;10:16;	235:18	mentioned (14)	mileage (1)	158:10;161:1;162:14;
36:20,20;37:21;39:3;	meeting (44)	32:15;74:23;	174:15	249:18
65:25;82:14;83:21;	9:12,17,24;10:23;	104:11;123:3;136:4;	mind (6)	mom (1)
92:18;97:17;99:19;	12:14,17,19;13:9;	157:12;160:21;	130:18;131:3,4;	48:15
104:20;125:4;165:5;	70:4,5,5,11,20;77:23;	196:18;230:14,15;	133:12;214:10;251:6	mom's (3)
180:9;185:15;188:19;	93:22;108:10;109:1;	239:25;240:16;243:9;	minding (1)	49:11,12,18
197:13;208:20;209:8;	111:18,25;113:7,18,	263:25	69:23	money (75)
210:24;247:19,19;	20;126:11,19;133:17;	mentioning (1)	mine (1)	16:25;17:14,15,19;
268:11,19	143:19,23;145:24;	160:11	212:16	19:3,14,15;23:20;
McDonough (2)	151:20;157:25;161:4;	mentions (1)	minimum (1)	24:3;25:7;28:7,8;
17:3;73:1	187:1;189:14;205:6;	252:22	35:5	29:23;35:21;65:3;
meal (5)	208:1;229:11,17,19;	mere (1)	Minor (2)	72:20;97:25;100:11;
21:23;123:8;	230:2,7,20;231:13;	124:12	183:13;186:20	111:16;114:22;
124:10;133:13;	256:6,12	merit (1)	minted (1)	116:19,20;117:1;
211:24	meetings (14)	70:2	54:24	118:4;119:7;120:6;
meals (16)	10:19;44:19;94:10;	Merritt (13)	minute (10)	126:13;128:3,13,24;
119:5;123:11;	111:7;125:5,6;197:3,	13:4,6;15:12,18;	34:5;58:13;83:10,	131:12,24;132:14;
	1	1	1	1

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 294 of 362
Bostock v. Video Deposition Septen **Colin Slay September 10, 2021**

Clayton County		T		September 10, 2021
120 0 120 22 24	266.0	105 0 5 107 15	5 221 14 221 2 7	06 10 00 10 02 0
138:9;139:23,24;	266:9	125:2,5;127:15;	5;221:14;231:3,7	86:10;88:19;93:9;
140:5;141:4,6,7,10,	mostly (1)	136:15;157:5,6;	next (7)	106:8;144:13;149:24;
14,15;152:16;153:18;	52:13	197:8;245:14,18;	73:5;118:21;131:6;	155:13;168:12,24;
154:20;162:20;164:5;	mother (2)	262:7,16	132:13;152:17;246:7;	175:19;179:23;
168:3;170:15;186:24;	*	named (1)	248:22	180:20;183:12;
187:1,3,6,13,22,24,	motivation (2)	52:2	night (1)	194:16;198:1,17;
24;188:9,10;189:7;	84:14,20	names (4)	133:23	199:16;200:14;202:8;
190:10,22;201:7,21;	motive (1)	49:17;59:22;	nine (3)	204:1,15;205:16,17;
242:12;244:16,17,20;		195:13;198:17	45:8,11;112:19	213:6;215:14;216:12;
248:17;254:13,17;	motives (1)	narrative (1)	nobody's (2)	220:5;221:18;232:17;
255:20;260:18;	96:2	217:7	167:19,22	233:9;244:25;264:1,2
267:19	MOU (51)	nature (8)	nod (1)	numbers (4)
money's (1)	16:14,24;19:18;	101:17;102:5,16;	6:9	86:24;170:2;195:7,
118:8	21:15,19;23:11,21;	174:21;196:24;229:1;	nods (1)	8
monies (14)	30:8;39:8;77:19;	230:13;268:1	59:6	numerous (2)
17:11;25:14;72:11;	114:6;116:11,13;	nearly (2)	none (5)	131:10,22
114:17;116:4,5;	117:25;118:8;123:19,	55:20;112:19	107:13;133:22,23,	
117:7,18;118:24;	24;125:22;127:6;	necessarily (12)	25;200:8	О
141:24;153:20,21;	135:20;149:6,13;	15:10;19:20;30:6;	nonexistent (1)	Ŭ
				41 (2)
242:6,17	166:8,12,18;167:7,7;	35:10;66:14;77:9;	267:11	oath (2)
month (4)	168:2,24;169:3,4,10,	80:9;102:24;113:19;	nonprofit (13)	142:16;269:17
82:14;178:19;	19;172:3;173:18;	163:3;193:1;258:18	10:8;22:19;23:6;	Object (14)
196:4;225:11			27:2,24;64:19;96:20;	
	175:21,25;176:14,24;	necessary (1)		15:25;17:7;27:4;
monthly (5)	178:5,20;179:25;	179:14	119:10;128:14;166:5;	32:9;109:22;128:9;
98:11;196:16;	188:19,24;194:1;	necessity (1)	171:20;173:17,19	130:15;138:14;
225:9;246:8;250:5	223:12;225:21;	98:3	nonprofits (1)	167:16;171:22;
months (9)	240:15;255:17;263:7,	need (27)	265:13	207:14;219:9;220:16;
44:1;45:23;56:17;	17	6:8;28:3,5;71:11;	nor (1)	260:5
101:1,3;168:16;	Mount (1)	82:19,23;95:24;	84:3	objecting (1)
169:20;172:4;196:20	21:3	106:21;138:11;		130:25
			normal (2)	
Moore (6)	MOUs (3)	142:19,23;170:1;	35:15,23	Objection (2)
13:5;15:12,18;	167:25;176:6,6	173:9;174:17;185:13;	normally (2)	28:11;221:1
63:22;131:8;143:22	moved (6)	187:21;188:11;	27:8;212:20	objectives (3)
morale (1)	42:14;57:16;188:1;	189:12;190:4;198:3;	North (2)	171:3;238:17,18
88:12	251:9,12,13	206:21;207:24;222:6;	50:9,23	obligation (3)
morally (1)	moving (1)	245:13;246:19;	notations (2)	129:20,24;130:1
259:2	34:2	265:18;269:14	99:3;102:15	obliged (1)
more (43)	Mrs (1)	needed (9)	notch (1)	5:22
7:16;13:25;18:18,	152:1	121:15;187:17,20;	88:1	observations (2)
24;31:5;57:16;58:21;	much (12)	199:8;212:23;255:6;	note (4)	103:11;240:4
				*
66:25;67:13;68:2;	18:18;27:22;31:14;	260:2,11,12	71:7;175:24;179:2;	observe (1)
69:11;76:10;77:22;	69:2,20;104:23,23;	needs (5)	240:5	90:3
78:3;83:20,22;88:11;	116:18;142:5;172:8;	6:13;24:12;126:20;	noted (3)	observed (1)
90:3;96:25;98:8;	228:18;260:17	152:14;214:12	83:7;101:11;193:10	148:25
108:11;127:23;	multiple (6)	negative (3)	notes (1)	obtained (1)
160:10,13;161:10;	68:22;162:16;	53:20;66:25;83:5	162:6	271:22
162:4,19;164:6;	163:4,6;182:2;244:21	negligence (2)	notice (2)	obtaining (1)
167:23;174:24;	must (3)	137:9;152:25	43:20;152:24	125:10
177:14;200:12;	72:12;103:19;	negligent (1)	notified (5)	obvious (2)
211:11;212:22;	245:15	108:15	96:15;121:3,14;	103:11;146:20
228:17;229:4;235:24;		Network (4)	127:25;206:5	*
	myself (8)			obviously (7)
246:19;247:6;254:5;	28:20;33:21;129:9;	51:23;52:8,9;53:23	notwithstanding (2)	7:20;8:11;76:9;
257:12;265:6;269:19	241:3;257:20;258:1,	new (21)	29:6;43:6	101:24;146:16;
morning (3)	4,10	43:24;46:3;52:14;	November (3)	185:15;226:20
	7,10			
5:11,13;151:15		88:9;96:12;133:16;	73:18;103:13;	occasional (2)
mornings (1)	N	174:17;177:15,16;	225:12	266:11;268:19
188:5		178:2,3,20,21;188:2;	Nowhere (1)	occasionally (1)
	nomo (29)		, ,	
Most (18)	name (28)	191:13;224:25,25;	149:12	266:17
11:24;39:12;92:21;	5:11;13:3;31:20;	251:10,12,13,19	nuanced (1)	occasions (2)
101:25;126:9;192:15;	39:10;47:18;48:2,15,	Newnan (1)	27:12	209:10,20
212:11;217:8;219:19,	21;49:25;51:22;52:5;	49:22	number (40)	occupying (1)
23,25;259:23,24;	53:5;64:15;75:4;	news (8)	6:1;41:6;67:16,19;	221:25
260:3,11,16;265:12;	105:13;107:8;119:25;	109:16,20;110:3,4,	71:22;73:18;81:1;	occur (8)
	1			

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 295 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County	T			September 10, 2021
109:15;133:12;	often (8)	operating (8)	237:25	oversight (22)
138:11;217:22;218:4;	41:11;53:10;99:11;	31:22;32:4,7,16;	out (52)	35:24,25;64:8;
221:4,7,9	162:19;188:19,21,23;	34:10,14,24;35:13	7:10;10:11,15,18;	85:24;86:2;119:11;
occurred (17)	209:19	operations (8)	11:18;14:13;25:9,10;	120:7;123:1;128:16;
12:19;24:10;39:17;	old (4)	56:21;57:1;58:18,	30:11;32:2;34:24;	131:13;132:1,11;
46:11,24;101:14;	42:5,7;51:1;206:12	19;59:4;60:3;218:23,	37:2;40:22;45:8;	134:9,10,15,16,19;
104:18,21;105:2;	once (10)	25	46:10,25;52:9;60:8;	141:23;193:14;246:5,
108:3;160:14;191:21;	43:20;85:7;89:18;	opinion (9)	71:8;81:21;84:15;	16;267:13
200:11;208:23;231:1;	101:13,13;121:18;	22:14;27:14;63:9;	87:12;91:7;95:5,24;	overstepping (2)
241:4;254:25	167:25;171:11;234:9;	253:4;263:2,2,3,13;	98:3,21;99:25;	119:13;128:17
occurrence (1)	235:23	265:15	101:20,25;111:13;	overusing (1)
209:3	one (71)	opinions (1)	116:11;117:2;124:9,	53:20
occurring (4)	8:20;15:17;19:16;	13:17	20;133:22;137:5;	Owen (2)
85:1;109:13;	20:10,20,25;30:24,24;	opportunities (1)	142:2;159:12;163:8,	184:4;190:15
173:19;223:15	39:13;45:1;47:23;	57:19	10;189:22;192:7;	own (13)
o'clock (1)	49:11,12,13;55:9;	opportunity (4)	197:14;212:18;	26:22;63:8;103:11,
147:3	60:17;61:9;64:10;	90:3;121:6,19;	214:12;221:16;	18;132:15,16;134:1;
October (3)	65:25;75:22;80:24;	143:1	223:14;248:17;261:7,	138:9;141:5;218:19;
114:15;202:22; 221:22	83:20,22;86:23; 108:4;113:14;128:6;	opposed (3)	20;272:19 outgoing (1)	254:17;255:20;258:7
odd (4)	136:13;141:1;144:12;	44:5;131:4;201:18 opposite (1)	outgoing (1) 225:11	owned (1) 132:17
247:18;248:1,7;	130:13;141:1;144:12; 145:17;149:2;155:9,	247:7	outlets (1)	134.17
251:9	9;157:3,7,12;161:21;	option (2)	217:9	P
oddity (1)	166:17;171:18,18;	97:17;99:23	outlier (1)	1
265:12	173:21,22;177:16;	order (16)	266:19	P-10 (1)
off (28)	179:5;180:4,9;	23:9,24;24:3;25:7;	outlined (1)	144:13
33:22;34:3,5;40:13;	186:17;196:6;200:25;	28:4;29:13;46:3;	117:25	P-17 (1)
65:11;71:13,15,17;	202:10;206:7,8;	72:16,20;105:17;	outlook (1)	149:24
79:13;99:9;112:2;	211:24;223:18;	129:16;170:11,15;	220:14	P-19 (1)
126:3;142:7,8,9;	232:11,12;241:9;	193:17;207:11;240:1	outside (12)	81:1
179:16;187:7;200:5;	244:25;245:16,18,23;	ordered (8)	20:12,14,16;27:10,	P-20 (1)
214:14,15;242:9;	246:1,3,15;254:15;	33:13;127:24;	21;37:23,23;47:7;	106:8
243:12,15;244:18;	255:8;262:5;265:19,	141:11,13;202:18;	49:5;50:6;171:20;	P-21 (1)
269:4,5;272:15,17	24;266:11	239:18,20;246:16	249:14	194:16
offer (1)	ones (1)	ordering (1)	outstanding (2)	P-22 (1)
157:25	75:1	21:6	94:5;267:16	198:1
office (44)	one's (2)	orders (2)	over (33)	P-23 (1)
19:6,10;81:9;	50:23,23	116:20;117:1	35:11;44:10;47:24;	199:16
107:11,12;108:11,16,	one-sentence (1)	organization (7)	50:20;59:1;64:8;	P-24 (1)
18;120:14;129:10;	74:10	27:1;31:4;119:10;	81:12;85:24;86:2;	200:14 P 25 (1)
147:3;152:3;153:17; 156:11,17;184:8,10;	ongoing (4) 7:24;27:22;83:3;	124:21;128:15;185:7; 201:3	109:5;114:13;116:22; 119:18;126:3;148:20,	P-25 (1) 202:8
185:4;187:1;189:4;	98:6	organizations (2)	20;154:6;160:6;	P-26 (1)
190:21;196:5,12;	online (2)	57:20;244:21	171:13;187:3;203:20;	204:1
198:23;200:3,17;	52:18,21	organization's (1)	205:3;207:22;211:12;	P-27 (1)
202:11;203:20;204:4;	only (34)	255:12	224:8;232:17;243:14;	204:15
205:7,8,14;208:13;	8:10,15,16;13:18;	orientation (2)	245:11,15;246:15;	P-28 (1)
235:4,14;236:2;	14:9;16:24;25:3;32:4,	104:5;217:16	261:25;264:16;	205:17
244:6;250:6,7,14,15,	5;48:4,25;74:22;75:1;	oriented (1)	268:10	P-29 (1)
17,22;251:11	86:2;104:6;145:17;	53:7	overall (4)	213:6
officer (4)	157:17;191:12;	original (9)	87:24;95:1,15;	P-3 (1)
54:22,25;55:7;	220:11;224:7;228:14;	166:17;168:2,24;	265:16	71:22
114:17	243:7,24;244:4;	175:25;176:3,4;	overarching (1)	P-30 (1)
officers (1)	245:23;246:1,3;	188:19;195:6;263:17	78:2	215:14
197:6	247:8;253:21;255:10;	originally (2)	overly (1)	P-31 (1)
official (6)	260:1;270:16,20,24	51:3;92:13	238:9	216:12
94:3;134:11;	open (5)	originated (1)	oversaw (2)	P-32 (1)
141:21;224:22,22;	129:4;152:2,4;	103:2	26:9;172:16	86:10
263:10	235:14;260:19	others (1)	oversee (3)	P-33 (1)
officially (1)	operated (1)	164:7	156:25;157:23;	88:19 D 24 (1)
59:13	158:4	otherwise (1)	158:12	P-34 (1)
off-the-record (2) 71:21;199:22	operates (2)	30:20 ourselves (1)	overseeing (1)	93:9 P 35 (1)
/1.21,199.22	139:14;177:24	ourselves (1)	158:1	P-35 (1)

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 296 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County				September 10, 2021
221.19	20.22.20.16.51.21.	171.47	24.99.16.90.12.00.4	200.8
221:18	38:23;39:16;51:21;	171:4,7	24;88:16;89:12;90:4,	200:8
P-36 (1)	53:8;54:17;63:23;	paying (4)	9;91:15;93:15,15;	phone (27)
168:12	84:13;123:10,11;	133:4,6;210:9;	94:3,5,6,25;95:15;	9:23;10:20;40:25;
P-37 (1)	131:21;134:17;	265:7	101:4,12;120:21;	41:6,9,11,15,20,22;
175:19	136:12;152:14;154:3,	payment (20)	182:1;220:7	42:8,10,21;43:11;
P-38 (1)	5;159:14,19;160:4;	23:9,11,15,24;24:2,	performance-related (1)	44:16,21;46:2,3;
179:23	168:21;177:2;184:14;	3,6;72:16,20,23;	77:25	155:2,3,8,12;156:15;
package (1)	190:11;191:14;193:5;	170:12,16,18;172:5;	performed (4)	206:10;208:7;250:5,
249:16	203:18;209:12;	188:19;191:13;	168:1;266:8,9,24	24;251:22
page (19)	226:18;230:16;248:3;	222:22;240:1;250:4;	perhaps (7)	phones (8)
72:9;86:22;88:5,22;	259:23;260:14;261:6,	262:24	49:9;76:18;84:15;	42:24;45:1,19;
91:3,17;99:9;106:13;	18;266:9	payments (6)	94:18;220:14;221:20;	206:11;250:25;251:4;
128:7,12;143:6,8;	partially (1)	19:9,9;202:18;	257:14	252:15,16
169:25;199:25;	64:21	234:10;245:12;259:5	period (18)	photographs (1)
248:22;260:23;261:1;	participant (1)	Peachtree (2)	55:23;56:15;58:14;	104:15
269:21;271:8	111:6	48:20,21	65:16;86:15;87:19,	pick (2)
pages (2)	participate (4)	penalties (2)	20,25;88:10;92:7;	69:13;98:5
86:21;87:3	38:8;54:5,13;89:4	5:19,20	118:12;126:8,9;	picked (1)
paid (45)	participating (1)	penalty (1)	205:14;235:20;247:4;	233:2
	136:22	5:19	250:17;253:16	picking (1)
16:25;23:10,22;	participation (1)			97:18
24:6;30:2;32:5;33:8;		pending (5)	periodically (4)	97:18 picture (1)
53:25;72:14,23;	76:19 particular (12)	12:5;128:1;145:21; 146:22;217:5	41:18;42:2;174:18;	268:20
116:5;133:14,24;			183:1	
170:22;171:11,13;	19:22;20:20;41:20;	people (57)	periods (1)	pictures (1)
176:7;179:11;189:4;	89:14,17;97:20;	8:15,16;12:22;	86:2	156:1
193:12,23;201:6;	98:17;168:18;197:10;	13:16;21:6;25:20;	perjury (1)	pie (6)
210:15;211:2,4,13,18,	219:4;230:14;245:5	34:20;36:19,22;	5:19	247:15,20;248:7;
21,22,25;223:18,20;	particularly (1) 267:14	67:16,20;68:22;77:4;	permission (1) 255:21	269:22;270:2;271:2
225:4,6;228:9;233:4,		90:4;101:25;110:22;		piece (3)
5,21;234:12;235:4;	parties (5) 24:1;72:18;170:13;	133:22;136:22;140:3;	person (26)	70:8,9;231:3
244:6;250:8;252:11;		148:20;149:3;157:10;	14:4;52:19;70:8;	place (11)
261:20;265:11	176:6;249:21	158:15;162:17,18,21;	90:3;102:22;112:24;	16:5,9;58:22;78:23;
pandemic (3)	partner (2) 57:19;232:13	164:6;167:8,21;	113:2,4;124:7,18;	134:18;138:2,20;
174:9;212:21; 264:16	partners (1)	174:6;179:2;180:20;	125:1,1;139:13;	193:15;242:3,13,22 placed (6)
Panel (3)	57:19	185:12;192:16,17,23,	157:3;161:21;180:25; 183:12;187:9;192:7;	146:25;182:25;
182:20,23;183:22	partnerships (1)	24;197:12;201:21; 218:12,15,25;219:25;	224:7;242:11;244:16,	222:13;223:1,4;227:1
	209:18	220:2,5,12;233:9,16;	16,18;245:2;246:15	Plaintiff's (16)
papers (1) 39:14	party (7)	241:10;253:15;	personal (14)	71:25;80:25;93:8;
	24:14,17;176:1,23;		24:4;38:12;47:2;	106:7;143:5;145:8;
paperwork (1) 195:25	233:14;262:22,22	263:20;264:24;265:7; 266:16;272:5,6,7	69:24;72:21;119:5;	168:7,14,24;170:9;
				175:25;177:4;205:16;
paragraph (11)	pass (3) 92:25;100:4;103:2	people's (1)	139:20,24;140:23; 170:16;201:8;211:25;	
114:15;117:7;		233:21		213:3;215:16;216:11
118:21;128:12;131:7;	passing (1) 197:18	per (12) 7:5;14:14;22:1;	241:15;254:21 personality (1)	plan (1) 172:5
143:8;152:17;170:8, 8,11;193:10			69:3	
parameters (3)	past (5) 41:10;97:19;	43:5;96:20;103:23; 128:7;237:4,13;	personally (15)	planning (1) 146:18
17:25;35:17;263:17	130:19;197:5;268:18	239:18;259:25;	51:1;70:3;77:3;	played (3)
parent (1)	pasted (1)	264:13	80:21;122:25;131:12,	46:25;123:13;
25:7	214:5	perceived (2)	25;154:10;185:25;	132:24
parenthetical (1)	Paul (2)	168:22,23		players (1)
153:13	107:7;151:25	percent (10)	186:3,5,8,10;241:25; 245:23	75:6
parents (5)	pay (25)	42:9;189:17;	personnel (2)	please (6)
24:13;28:1,6;29:16; 33:8	21:12;24:17,20; 28:24;29:3,7,16;	248:25;249:7,8,9,10; 270:6,9,18	68:1;179:19	5:4;8:23;67:14; 142:7;225:9;269:22
parent's (1)	55:18;210:12,14;	percentages (2)	persons (1) 180:21	pleased (1)
29:2	211:14,14,18,23,24;	247:16,21	perspective (1)	87:23
Park (4)	212:2,6,6;233:9,10,	perform (1)	173:19	pm (2)
48:18;51:4,6,8	11,12,22;264:19;	127:23	pertain (1) 194:14	272:15,23
Parkway (1)	265:5	performance (31)		pockets (1)
21:3	paychecks (1) 219:7	65:16;66:21,23;	pertaining (2)	77:5
part (38) 7:7,21;27:22;29:20;		83:7,14,25;84:9,16; 86:1,14,16;87:4,18,	197:7,15 pertains (1)	point (40) 10:17;21:9;44:4;
1.1,21,21.22,29.20,	payee (2)	00.1,14,10,07.4,10,	pertams (1)	10.17,41.7,44.4,
	-	-	-	

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 297 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County				September 10, 2021
46 5 50 5 00 10 00 0	101 21 102 1	250.10		261 10 262 16 261 7
46:5;79:5;82:12;90:2;	101:21;102:1;	258:10	problems (4)	261:18;263:16;264:7;
92:9;95:14;105:17;	217:23;218:13,16;	president's (1)	53:16;77:25;182:1;	265:10,11,17,21;
119:21;120:17,25;	219:20	243:12	254:16	266:24;267:10,16;
129:5;130:17;131:2;	potentially (2)	pretty (10)	procedure (1)	271:18,19,22
133:16;146:15;	152:15;248:5	40:24;45:20;48:14;	140:4	programming (1)
			procedures (18)	65:5
147:17,19,20;159:7,	power (1)	74:10;87:23;101:5;		
21;163:19;167:2;	195:22	116:18;130:6;172:8;	88:10;92:5;117:25;	programs (7)
194:3;202:16;204:7;	practically (1)	209:3	123:1;134:18;137:11;	57:6;60:7;85:20;
206:11,16;211:9;	139:19	prevent (1)	138:2,6,19;139:9;	240:6;265:13,19,24
218:21,22;222:1;	practice (10)	249:18	169:6,9,15;238:19;	program's (1)
230:22;237:20;241:7,	12:7;27:16;41:17;	prevented (1)	240:7;242:13,21,22	265:9
		173:18		
9;251:15,16	221:15;243:17;245:4,		proceedings (1)	progressive (1)
poise (1)	6;246:14;255:3,4	previous (5)	94:19	70:23
91:24	practices (5)	12:21;42:11;46:2;	proceeds (1)	prohibited (1)
Police (4)	16:9;139:18;	173:18;175:24	201:12	30:8
10:15,22,23;11:7	153:12;244:22;257:9	previously (3)	process (16)	prohibition (1)
policies (11)	pre (1)	94:11;178:10;	19:14;104:12;	114:7
123:1;134:17;	184:7	206:23	114:23;117:11;	promote (3)
137:10;169:7,10;	premises (1)	primarily (14)	118:18;129:5;130:17;	140:21;271:18,18
197:2;240:7;242:12,	175:16	38:22;62:14,18;	152:14;164:22;179:1;	promoted (5)
20,22;255:9	pre-pandemic (1)	66:9;67:2;154:17;	225:22;235:2;237:10;	55:9,14;56:1,18;
policy (7)	174:25	157:24;162:5,19;	245:1;251:18;267:13	88:11
27:16;70:24;78:22;	preparation (3)	178:2;203:6;209:17;	processes (2)	promotion (2)
124:3;127:11,11;	16:21;38:10;215:11	237:22;239:16	138:25;207:24	56:22;58:23
243:22	prepare (1)	primary (6)	produce (2)	prompt (2)
poor (1)	38:15	75:24;76:3;115:8;	63:25;259:17	96:9,10
153:11	prepared (4)	119:2;134:17;200:25	produced (3)	prompted (1)
porch (4)	86:17;177:19;	prime (1)	70:19;138:21;	215:22
159:4,13;160:1,6	198:10;202:13	237:22	145:17	promulgate (1)
pornography (1)	prescribe (2)	principles (4)	productive (1)	221:5
104:15	259:4,22	257:1,7,16;258:21	88:11	proper (14)
		• 4 • (4)	1 (1 14 (4)	16500000
portion (1)	presence (4)	printed (1)	productivity (1)	16:5,9;27:7;30:7;
270:16	presence (4) 226:1,8,8;230:12	81:20	94:8	16:5,9;27:7;30:7; 129:15;137:12;138:2,
270:16 portrayed (2)	226:1,8,8;230:12 present (15)	81:20 prior (9)	94:8 professional (9)	129:15;137:12;138:2, 5,19;187:9;189:21;
270:16 portrayed (2) 217:8;260:19	226:1,8,8;230:12 present (15) 6:25;12:11;13:9;	81:20 prior (9) 43:9;72:12;78:25;	94:8 professional (9) 66:5,11;111:19;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18
270:16 portrayed (2) 217:8;260:19 position (33)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1,	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9;
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2)	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2)	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29)	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1)	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2,	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1)	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77)	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77)	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12;
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20;
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9,	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17;
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1)	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20,	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7,	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11,
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1)	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20,	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20;
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24;	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1)	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1 post (1)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1) 43:1	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8 probation (9)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25; 170:24;171:1;174:16;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6) 70:20;92:10,13;
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1 post (1) 268:15	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1) 43:1 preserve (5)	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8 probation (9) 54:22,25;55:7,10,	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25; 170:24;171:1;174:16; 176:10;177:24;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6) 70:20;92:10,13; 102:10,11;117:13
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1 post (1) 268:15 posted (1)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1) 43:1 preserve (5) 40:1,10,16;41:14;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8 probation (9) 54:22,25;55:7,10, 16,17,22,23;105:9	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25; 170:24;171:1;174:16; 176:10;177:24; 179:14;181:18;183:2;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6) 70:20;92:10,13; 102:10,11;117:13 punished (1)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1 post (1) 268:15 posted (1) 268:18	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1) 43:1 preserve (5) 40:1,10,16;41:14; 43:2	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8 probation (9) 54:22,25;55:7,10, 16,17,22,23;105:9 problem (7)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25; 170:24;171:1;174:16; 176:10;177:24; 179:14;181:18;183:2; 191:6,13;192:21;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6) 70:20;92:10,13; 102:10,11;117:13 punished (1) 63:10
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1 post (1) 268:15 posted (1)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1) 43:1 preserve (5) 40:1,10,16;41:14;	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8 probation (9) 54:22,25;55:7,10, 16,17,22,23;105:9	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25; 170:24;171:1;174:16; 176:10;177:24; 179:14;181:18;183:2;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6) 70:20;92:10,13; 102:10,11;117:13 punished (1)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1 post (1) 268:15 posted (1) 268:18 postgraduate (1)	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1) 43:1 preserve (5) 40:1,10,16;41:14; 43:2 preserved (1)	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8 probation (9) 54:22,25;55:7,10, 16,17,22,23;105:9 problem (7) 68:18;69:17;83:2;	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25; 170:24;171:1;174:16; 176:10;177:24; 179:14;181:18;183:2; 191:6,13;192:21; 201:21;202:5;222:9,	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6) 70:20;92:10,13; 102:10,11;117:13 punished (1) 63:10 purchase (3)
270:16 portrayed (2) 217:8;260:19 position (33) 13:20;55:7,25;56:1, 16,19,24,25;57:1,2,3; 59:2;64:7;69:12,14; 82:13,22;83:9,10; 85:19;97:11,18;98:2, 4;114:25;115:1; 189:22;218:21; 221:20,25;225:15,20; 230:4 positions (5) 59:19,24;60:14,17; 97:13 positive (2) 93:23;120:20 possible (4) 87:13;91:7;95:5; 210:23 Possibly (4) 102:20;156:24; 158:11;161:1 post (1) 268:15 posted (1) 268:18	226:1,8,8;230:12 present (15) 6:25;12:11;13:9; 55:4;70:4;107:23; 109:1;150:19;197:5; 227:5;229:17;230:21; 233:8,8,8 presented (29) 71:22;79:14;81:1; 86:10;88:19;93:9; 106:8;144:13,24; 149:24;152:6,11; 168:12;175:19; 179:23;194:16;198:1; 199:16;200:14;202:8; 204:1,15;205:17; 209:23;213:6;215:14; 216:12;219:24; 221:18 presenting (1) 78:25 presently (1) 41:11 preservation (1) 43:1 preserve (5) 40:1,10,16;41:14; 43:2	81:20 prior (9) 43:9;72:12;78:25; 79:14;103:4;160:19; 174:9;180:11;184:7 private (7) 22:18;26:8;27:1; 130:3;134:9;138:12; 141:10 privileged (1) 7:14 privy (1) 137:20 probable (1) 109:11 probably (24) 10:16;12:3;16:20; 20:10;28:25;35:5; 44:8;46:7,9;50:6; 58:20;67:19;68:2; 70:17;76:22;169:8; 209:13;215:1,11; 226:4;245:3;254:4; 264:9;266:8 probation (9) 54:22,25;55:7,10, 16,17,22,23;105:9 problem (7)	94:8 professional (9) 66:5,11;111:19; 112:5;236:6,10; 238:2;248:11;249:8 professionally (2) 66:17,18 professionals (1) 66:13 profited (1) 132:23 program (77) 11:23;17:2;19:1; 22:23,24;24:8;26:9; 27:10,17,25;29:10; 30:14,17;35:4;37:12; 38:8;51:21,22;52:11; 53:2,6,7,13,25;54:9, 18;56:12;57:16; 72:25;74:3,21;75:20, 21,23;114:19;116:7, 8;117:8;119:3; 140:19,22;141:8; 149:20;164:21,25; 170:24;171:1;174:16; 176:10;177:24; 179:14;181:18;183:2; 191:6,13;192:21;	129:15;137:12;138:2, 5,19;187:9;189:21; 193:13,14;242:18 properly (4) 29:1;118:2;166:9; 246:20 property (3) 128:3;146:8;154:22 propound (1) 143:24 prospects (1) 53:21 protocol (1) 10:25 provide (12) 29:5,9,12;30:12; 62:11;121:25;130:20; 136:20;192:17; 202:17;209:16;215:4 provided (10) 19:18;62:7;98:11, 13;117:21;122:20; 147:1;154:8,17;254:9 providing (6) 70:20;92:10,13; 102:10,11;117:13 punished (1) 63:10

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 298 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County	1			September 10, 2021
purchased (3)	103:5;118:24	9:19,20;12:14,17;	receptions (1)	263:22
154:22;158:17;	Ramos (10)	13:24;14:14,17;	135:13	recruited (5)
248:2	157:6;158:8,8,20,	19:19;26:5;41:16,19;	recess (4)	36:4;75:7;76:7;
purchases (5)	24;159:10,18;160:16,	42:25;43:1,3,14;	71:18;142:10;	149:1;263:21
74:15;132:16;	20,21	44:22;46:14,22;	214:16;269:6	recruiting (19)
134:24;135:1,11	ramp (1)	57:10;61:24;63:24;	recipient (5)	21:17;35:1;36:19;
purpose (11)	158:14	64:1;69:25;78:8,17;	17:20;73:7;149:15;	74:19;76:16,18;
33:3;75:24;119:2;	ran (2)	79:1,20,22,23;80:17,	201:9;216:17	77:11,12;114:2;
155:19;179:18;216:5;	68:18;236:15	23;82:10;84:2,21;	recitation (1)	127:13;163:2;164:17,
247:23;252:15;	Randy (1)	89:23;94:16,20;97:4;	172:6	20;173:15;174:19;
261:17;263:15;	50:5	98:14;99:16;101:9;	recite (2)	248:4;265:4,6;271:19
271:18	rarely (1)	103:3;108:23;110:8;	245:12,17	recruitment (28)
purposefully (1)	92:5	111:18,18,22;112:6,	recites (2)	17:21,25;73:8;
162:17	rated (9)	10,17;113:17;118:14;	170:6;239:16	74:12;75:24;76:4,14,
purposes (1)	87:7,9,19;88:1,2;	122:24;123:3;125:2;	reciting (1)	15,20;119:4;135:22;
172:1	91:6,14;94:7,8	126:15;148:9;158:7;	153:3	149:7,16;165:13;
purvey (1)	rather (3)	159:3;162:3;163:16;	reclassification (3)	171:1;173:1,7;
14:17	9:8;29:2;218:25	184:22;185:22;	57:8;58:5,6	240:10;246:10,21,21;
purview (1)	rating (7)	186:13;198:20,23;	reclassified (1)	247:13,24;250:9;
242:2	87:16,19;88:10;	207:9;225:16;226:19;	57:3	251:1;252:17;263:15;
pushed (3)	89:16;92:6;94:2,9	227:5,23,24;228:1;	recognition (2)	270:3
89:16,20,24	Raymond (2)	230:19;231:9;233:7;	168:1;174:20	recruits (1)
put (9)	48:22;49:2	238:12	recollection (7)	135:15
21:24;75:4;120:22;	reached (2)	recalling (1)	65:22;89:12;97:10;	red (8)
140:10;183:9;189:25;	10:15,18	112:7	112:4;113:19;189:19;	101:21;102:1;
190:3;193:15;219:13	reaction (1)	receipt (8)	230:13	121:16;122:7,22;
putting (2)	130:21	17:11,14,15;	recommend (9)	123:4;129:1;131:3
15:22;270:19	read (5)	114:17;116:3;117:18;	61:17,18,19;62:4;	refer (2)
, , , , , , , ,	73:3;229:10;	190:22;244:17	244:5;246:7;250:7;	108:18;248:23
Q	256:22;272:18,20	receipting (1)	263:8,10	reference (2)
	reading (8)	238:19	recommendation (8)	111:10;226:12
qualifiers (1)	23:21;147:11;	receipts (10)	61:8,11,12,21;	referenced (3)
37:9	169:1;183:14;219:1;	114:23;117:12;	240:12;241:18;246:8;	77:23;83:8;232:23
Quantity (1)	247:5;271:11,24	138:21;153:14,18,25;	249:17	referencing (3)
94:8	ready (2)	154:1;195:8;249:12;	recommendations (1)	136:19;160:24;
questionable (1)	269:9,10	254:9	240:4	161:16
132:16	real (1)	receive (5)	recommended (2)	referred (3)
questionnaire (3)	177:1	40:3;46:16;98:22;	227:6,11	53:11;75:11;122:22
74:24;137:2;263:20	realize (4)	116:15;209:13	record (26)	referring (16)
quick (3)	112:8;142:23;	received (38)	5:4;19:12;71:16,20;	81:3;116:5;123:8,8;
9:23;37:24;95:7	161:9;241:8	19:3,4,6,10;23:20;	100:21;125:18;	125:1;129:9;144:8;
quickly (2)	really (27)	40:5;43:9,20;56:9;	131:10,23;138:2,6,19;	150:6;158:21;165:7;
48:14;148:9	8:12;13:23;16:24;	65:7;68:11;72:12,15;	142:7,8,12,14;153:11;	193:19;222:15,18,20;
quite (6)	36:25;45:16;57:2;	81:15;85:7;92:19,20,	200:6;214:14,18;	233:17;248:19
41:10;67:16;69:18;	66:25;68:17;73:11;	21;95:11;98:22;	259:14,18,20,21;	refers (1)
131:20,21;229:17	81:11;95:14;96:5;	114:15;118:19;	269:4,8;272:16	79:7
quote (3)	100:5;102:22;111:14;	120:19;145:13;	recording (2)	refined (1)
69:1;72:19;257:21	118:15;119:18;	147:12;150:9;153:14,	117:11;139:23	265:3
n	130:10;139:19;146:8;	15;189:8;195:3;	records (30)	reflects (1)
R	163:9,16;171:4;	200:18;202:19;204:4;	100:25;118:12;	272:21
	179:15;186:12;246:2;	207:23;238:10;	122:1,1,24;130:3;	reform (1)
raise (8)	252:17	257:24,25;261:8	137:11;154:16;	53:8
9:9;29:23;30:11;	reason (12)	receives (3)	155:25;156:18;195:7,	reforms (1)
31:4;188:6;201:5,7;	6:2;42:15;45:17;	19:9;20:1;244:16	19;196:2,4,11,14,17;	209:18
261:17	141:22;177:2;181:25;	receiving (3)	197:4;202:21,23;	refusal (1)
raised (11)	197:10,14;200:8; 261:10;270:25;271:4	25:14;198:20,24	203:15,16,20;205:2, 10;207:22;235:14,16;	29:7 regard (2)
27:10,20,21;30:19;	reasonable (1)	recent (1) 159:13	244:17;260:18	67:12;124:23
32:12;113:13;118:4;	242:11	recently (1)	recovered (2)	regarding (5)
121:16;129:1;130:14;	reasons (6)	189:8	202:20,23	98:12;143:25;
1/11.7			404,40,43	70.14,143.43,
141:7				200.18.240.7.240.10
raises (2)	9:2;13:14;14:9,12;	reception (5)	recruit (8)	200:18;240:7;249:19
				200:18;240:7;249:19 regardless (5) 29:15;84:4;167:6;

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 299 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

169-12	Clayton County	T	T	T	September 10, 2021
regards (2) 139:14223:16 139:14223:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:1423:17 139:14	160.16.250.1	160.21	(1)	94.17.262.10	10.0
Topic Topi					
regular (2)					
regular (2)	139:14:223:16	8:22:14:24:20:20:	report (53)	24:17.20:29:5:84:7:	60:4.5
Trigonary (2)	*				
regularly (2)					
23518,20	*				
reimbursencos (2)		, , , , , ,			
reimbursencos (2)	235:18,20	52:17;63:23;78:18;	131:10,15,17,18,22;	requirements (1)	52:24;69:2;140:1;
212:174:14 81:21:96:12:973; 106:23:1077.8; 106:23:1077.8; 106:23:107.78; 106:23:107.78; 106:23:107.78; 106:23:107.23:13:11:123:15:125:4; 137:142-14:14:15:12:14.15; 107:14:13:15:12:14.15; 107:14:14:15:12:14.15; 107:14:14:15:12:14.15; 107:14:18:123:18:16; 249:52:56:22:260:11, 120:57:10 120:11:14.15:11.12:14.15; 107:14:18:123:18:16; 105:78:18:12; 249:52:56:22:260:11, 130:18 1		79:24.25:80:3.4.9:			263:21:267:15
reimbursed (2) 65.9:255:21 reimbursement (2) 21:20:138:10.23; 139:1:21:23:254-1; 1012.18;2564.11; 258:18 258:18 reimbursements (1) 258:12;26:118 258:18 reim (1) 174:1181:23:184-6; 175:110:22.25: 129:181;73:1.15; 120:141:17:182:23:19, 174:1181:23:184-6; 174:1181:23:184-6; 174:1181:23:184-6; 174:1181:23:184-6; 175:118-23:141-15:110:22.25: 123:24:226:111,224: 175:226:111,224: 175:226:111,224: 175:226:111,224: 175:226:111,224: 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 175:236:11,236:21-0; 177:24 177:246:110:22.25: 177:246:110:24.25: 177:246:110:24.25: 177:246:110:24.25: 177:246:110:24.25: 177:246:110:24.25: 177:246:110					
66-92-525-21 106-23;107-7.8; 169-2;183:6;106-19; 199-1;183:19; 189-2;183:6;106-19; 199-1;183:19; 189-2;183:19; 189-2;183:19; 189-2;183:19; 189-2;183:19; 189-2;183:19; 199-2;183:1					
reimbursements (2)		, , ,			
21:20;138:10,23;		106:23;107:7,8;	169:2;183:6;196:19;	research (1)	
21:20;138:10,23;	reimbursement (12)	111:14,15;112:14,15;	197:23;214:22;	53:18	resulting (1)
139:1;212:3;254:7, 137:3;144:24;145:3; 225:10,14;226:6; 235:2;236:41; 258:2;260:11; 150:21:155:8;157:10, 249:5;256:2;2;260:11, 148:61:4;191:23; 142:67:5;70:10 130:18 173:15 173:15 174:1;181:23;184:25; 196:14;205:4;206:8; 199:18;173:1,15; 202:14;17247:16; 227:13;228:1,17; 229:18;173:1,15; 202:24;17247:16; 227:13;228:1,17; 229:18;173:1,15; 222:261:1,12;16;23:210, 114:19;206:25; 129:18;173:1,15; 229:226:11,12;16;23:210, 114:19;206:25; 197:4 227:15;228:1,17; 229:18;192:01, 229:18;192:01, 229:18;192:01, 229:22:11,12;16;23:210, 114:19;206:67:3; 86:3;105:20;112:22; 229:25 reminded (2) 93:11 relationship (7) 63:13:66:66:73; 86:3;105:20;112:22; 229:25 reminded (2) 93:14 reminding (1) 77:14 remainding (1) 175:14;23:3112:11 relationship (1) 155:14 represented (2) 113:20;267:11 relation (4) 177:14 represented (2) 113:20;267:11 relation (4) 177:14 represented (2) 113:20;267:11 relation (4) 177:14 represented (2) 177:14 represented (2) 177:14 represented (3) 177:14 represented (3) 177:14 represented (2) 177:14 represented (3) 177:14 represented (2) 177:14 represented (3) 177:14 represented (3) 177:14 represented (3) 177:14 represented (4) 177:10 represented (5) 177:14 represented (6) 177:14 represented (7) 177:14 represented (8) 177:15 represented (9) 177:14 represented (9) 177:14 represented (1) 177:14 represented (1) 177:14 represented (2) 177:14 represented (3) 177:14 represented (2) 177:14 represented (3) 177:14 represented (3) 177:14 represented (3) 177:14 represented (3) 177:14	21.20.138.10.23.			residency (1)	
10.12_18;256:41; 146:19_25;148:9; 125:21:58:81;710, 259:12_260:18 17:41;181:23;182:6, 142:65-75:270:10 249:5256:22:260:11, 142:67-75:270:10 142:11:75:13:15:12 112:15:57-6.17 119:41-35:15 142:67-75:270:10 142:15:15-17-64; 135:10 142:67-75:270:10 142:67-75:270:10 142:15:15-17-64; 135:10 142:67-75:270:10 142:67-75:270:10 142:67-75:270:10 142:15:15-17-64; 135:10 142:67-75:270:10 142:67-75:270:10 142:15:15-17-64; 135:10 142:67-75:270:10 142:67-75:270:10 142:67-75:270:10 142:67-75:270:10 142:67-75:270:10 142:15:15-15:12 142:15:57-6.17 142:15:15-15-6.17 142:15:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:15-15-6.17 142:					
258:8 rein tr (2) 258:12;260:18 rein (1) 17:158:23;159:7; 236:21;238:4,9.10; 14;186:14;191:23; 1607:8,163:13; 174:1;181:23;184:6, 14;186:14;191:23; 125:165:9;151.8,2.1, 125:165:9;151					
reimbursements (2)					
258:12;260:18		150:21;155:8;157:10,	236:21;238:4,9,10;		
258:12;260:18	reimbursements (2)	17;158:23;159:7;	249:5;256:22;260:11,	resolved (1)	retaining (1)
rein (1)					
144:186:14;191:23; 26:16;591:5,18,21, 11:19 73:3974;12:76:44 10:6;51:25;85;2,2; 129:18:173:1,15; 20:24;71:24;16;22 22:226:11,12,24; 227:5;228:1,17; 223:24;226:6 13:20:22;23:23:23:23:23:23:23:23:23:23:23:23:23:2					
relation (1) 19614;205:4;206:8; 25;6014;67:23:90.4; resource (4) 12:15;57:6,17; 119:4;135:23;149:8; 122:15;47:6,17; 129:18;173:1,15; 202:14,17;247:16,2 227:5;228:1,17; 227:5;228:1,17; 229:18,19;230:1,2; 228:25;229:1,2 230:20 reporting (6) 114:19;206:25; 233:24;226:6 19;20;237:14;240:17; 129:18,19;230:1,2; 230:20 reporting (6) 19:11 relationship (7) 96,10;102:2,1 96,10;102:2,1 97:102:2,23; 230:20 reporting (6) 98:11;003:4,111:1,139.7; relationship (1) 96,10;102:2,1 98:11;103:1,1139.7; retired (6) 98:11;103:2,325:8;267:12 229:2,2 111:5;225:17;246:8, 125:11;36:11;39.7; retired (6) 98:11;103:1,1139.7; retired (6) 12:2,118:2,1136:1,139.7; retired (6) 12:2,218:2,419:11; 98:11;102:3,9,11;103:6; 257:13;272:3 retirement (1) 229:2,266:4 111:5;225:17;246:8, 111:5;225:17;223:17,17;247:14, 146:11,2247:13;25; 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;246:8, 111:5;225:17;24					
40:16;5125,882.2; 207:17;208:7,7.19.21; 202:247:18;225:19; 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 228:25;229:12 229:25;11;12;22;23:11,12,16;232:10; 229:18,19;206:25; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;232:10; 231:1,12,16;323:10; 271:24 remembered (3) 9:11 relationship (7) 9:63:13:66:66:67:3; 86:3;105:20;112:22; 229:22 reminded (2) 9:12:25; reminded (2) 9:12:25; reminded (2) 9:12:25; reminded (2) 9:12:25; reminding (1) 55:14; 28:3;112:11 relatives (1) 55:14; 28:3;112:11 responded (3) respective (6) 24:1,5;72:18,22; return (1) 224:23 return (1) 224:23 return (1) 46:10 responding (2) responding (2) responding (2) return (1) 146:10 responding (2) responding (2) responding (2) responding (2) responding (3) 5:14;28:3;112:11 responding (3) 5:25;204:4;217:3; 23:14;255:24; 39:15,16;18:29; 70:20;24;271:3 38:14;255:24; 39:15,16;18:39; 39:15,16;18:39; 39:15,16;18:39; 39:15,16;18:39; 39:15,16;18:39; 39:15,16;18:39; 39:15,16;18:39; 39:15,16;18:39; 39:15,16;18:19; 19:19; 39:15,16;18:19; 19:19; 39:15,16;18:19; 19:19; 39:15,16;18:19; 19:19; 39:15,16;18:19; 19:19; 39:15,16;18:19; 19:19; 39:15,16; 39:19; 39:15,16; 39:19; 39:19; 39:15,16; 39:19; 39:1					
129:18:173:1,15; 216:2:217:18:225:19, 228:25:29:12 reporter (4) 227:5:228:1,17; 229:18,19:230:1.2; 228:24:226:6 19:20:237:14;240:17; 229:18,19:230:1.2; 230:20 11:16:233:2,13,15,15, 10:233:24;226:6 19:20:237:14;240:17; 271:24 remembered (3) 91:11 relationship (7) 63:13:66:66:67:3; 86:3:105:20;112:22; 229:22 229:22 232:7 relationships (1) 58:14 reminding (1) 58:14 reminding (1) 75:14 relative (1) 59:11 remember (1) 229:226:64 76:20:14 relative (1) 59:11 remember (2) 11:3:20:267:11 remember (3) 99:11;15:223:17:240:11 reminding (1) 77:14 relative (1) 59:8 remember (2) 11:5:225:17;246:8, 19:20:237:143:22 respective (6) 224:15;72:18,22; 224:23 return (1) 16:12:216:8 responding (2) 16:12:216:8 responding (3) 16:14 16:14 relative (1) 77:14 relative (1) 77:14 relative (1) 79:7 relative (1) 79:7 relative (1) 79:7 relative (1) 177:14 repair (2) 18:17:186:5 required (1) 177:14 repair (2) 18:17:186:5 required (1) 15:9:2 repoir (16) 18:17:186:5 required (1) 17:24:17:17:17 repair (2) 13:15:182:1 repoir (1) 13:23 repair (1) 13:23:3 repair (1) 13:31:182:1 repeated (5) 17:163:24:173:1 responsibility (7) reviews (7) 17:165:14:171:1; responsibility (1) 22:17:18; 22:18; 22:17:18; 22:18;		196:14;205:4;206:8;	25;60:14;67:23;90:4;		
129:18:173:1,15; 216:2:217:18:225:19, 228:25:29:12 reporter (4) 227:5:228:1,17; 229:18,19:230:1.2; 229:228:1,17; 229:18,19:230:1.2; 230:20 11:6:233:2,13.15,15, 10:233:2,13:21; 246:11,22:247:3,25; 228:24:226:6 19:20:237:14;240:17; reporting (6) 26:12:58:148,86:3; 223:24:226:6 19:20:237:14;240:17; remembered (3) 99:11 remembered (3) 96:10:10:221 remembering (1) 99:10 remembering (1) 99:10 remembering (1) 99:11 remembered (2) 99:12:22; 229:22 229:22 232:7 relationships (1) 58:14 reminding (1) 99:11:20:225:11:222; 229:22 reminded (2) 99:12:29:25 reminded (2) 13:20:267:11 remembered (3) 99:11:10:239:11:10:31:20:267:11 remember (1) 29:8 remember (2) 13:20:267:11 remember (3) 99:11:10:239:11:10:11:10:23:20:239:22 229:22 11:15:223:17;246:8, 19:50:239:11:10:13:00:267:11 remember (1) 29:11:15:223:17;246:8, 19:50:239:11:10:13:00:267:11 reporter (2) 29:22:264:4 reporter (3) 11:5:223:17;246:8, 19:50:239:11:10:13:00:39:11:10:30:	40:16;51:25;85:2,2:	207:17;208:7,7,19.21:	105:21;110:22,25:	12:15;57:6,17;	119:4;135:23;149:8.
202:14,17;247:16,22 222:26:11,12,24; 197:4 229:18,19;230:1,2; 230:20 reporting (6) 114:19;206:25; 231:1,12,16;232:10, 114:19;206:25; 232:24;226:6 19:02;237:14;240:17; 271:24 remembered (3) 91:11 remembered (3) 96:10;102:21 29:22 reminded (2) 115:225:17;246:8, 19 29:22 reminded (3) 96:10;102:21 29:22 reminded (1) 98: 8 reported (1) 98: 8 reported (1) 13:20;267:11 relatives (1) 13:20;267:11 relatives (1) 13:20;267:11 relatives (1) 13:20;267:11 relatives (1) 13:20;267:11 reported (1) 18:516 renewed (1) 20:17 relatives (1) 15:17,25 25:20;20;27 reminded (2) 15:17,25 respected (3) 25:20;27 reminded (2) 20:17 relatives (1) 18:516 renewed (1) 18:516 renewed (1) 18:516 renewed (1) 18:17;186:5 reported (2) 15:17 relatives (1) 18:17;186:5 reguest (1) 15:17;18;19; 15:20:21;19;20:19;31;19;20:19;31;31;31;31;31;31;31;31;31;31;31;31;31;					
relating (1) 227:5:228:1,17; 5:4:6:13:217:15; 12:25:143:21 246:11.22:247:13.25; 230:20 12:25:20:270:4 248:3;250:10:251:1; 252:20:270:4 248:3;250:10:251:1; 252:20:270:4 229:18,19:230:12; 230:20 reporting (6) 11:6:233:21:13:6:23:21:13:6:23:21:13:6:23:21:13:6:23:21:13:6:13:6			*		
relation (4) 114:19;206:25; 223:24:226:6 114:19;206:25; 223:24:226:6 19:11 relations (1) 91:11 relationship (7) 63:13;66:66:7:3; 86:63;105:20;112:22; 229:22 reminded (2) 50:14 relatives (1) 50:14 relatives (1) 113:20;267:11 relatives (1) 118:516 relayed (1) 118:17:185:5 repairs (1) 159:12 159:13 repaired (1) 118:17:185:5 repairs (1) 124:17.25;125:5; 133:15:182:1 repaired (5) 133:15:182:1 repaired (6) 117:13:154:16; 135:10 repaired (7) repaired (6) 117:13:154:16; 135:10 repaired (7) repaired (8) 118:29:29:22 repairs (1) 135:10 repaired (1) 133:15:188:1 repeated (6) 117:13:154:16; 133:15:188:1 repeated (6) 117:13:154:16; 119:17:20:15;19; 129:12:18:13:181:1; repeated (6) 117:13:154:16; 119:12:17:23:18:18:1; reponsible (4) 21:25:24:13:181:1; responsible (4) 21:25:24:13:181:1; responsible (4) 21:25:24:13:181:1; responsible (4) 21:25:25:157:22; responsible (4) 21:25:25:157:22; responsible (4) 21:25:25:13:18:11 rewarding (1) rest (2) 16:12:216:8 responsible (4) 17:14:14 17:13:154:16; 18:17:186:5 repaired (6) 117:13:154:16; 18:17:186:5 repaired (6) 117:13:154:16; 119:12:17:22:195:4; 119:12:27:30:24:17:3 repaired (6) 117:13:154:16; 119:12:27:23:13:12:1 responsible (4) 21:25:20:21:13:181:1; responsible (4) 21:25:20:2					
relation (4)				*	
114:19:206:25; 223:24;2266 19.20;237:14;240:17; 271:24 remembered (3) 94:10,14,18,23; 98:11;100:14;101:9, 96:10;102:21 remembering (1) 95:12;266:66;67:3; 86:3;105:20;112:22; 229:22 111:5;225:17,246:8, 19 121:17,17 111:5;225:17,246:8, 19 121:17 14 146:					
223:24;226:6 19,20;237:14;240:17; 110:23;252:8;267:12 91:18,92:3;96:18; 224:20 retired (6) 91:11 relationship (7) 63:13;66:66;67:3; 86:3;105:20:112:22; 232:7 relationships (1) 58:14 relative (1) 50:14 relatively (2) 113:20;267:11 relatively (2) 113:20;267:11 relatively (1) 185:16 relatively (2) 185:16 relatively (1) 185:16 relatively (2) 185:16 relatively (2) 185:16 relatively (2) 185:16 relatively (3) 185:16 relatively (4) 197:7; repeated (1) 177:14 reparted (1) 267:17 repaired (1) 158:17,25 request (15) 158:17,25 request (15) 158:17,25 repaired (1) 159:13 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:3,4; 235:14;237:24 reviewed (2) 177:17 repeated (5) 124:17,25;125:5; 124:17,25;125:5; 124:17,20:15;19; 135:10 repeated (5) 125:20 requesting (4) 177:17 repeated (5) 133:15;10 repeated (1) 133:23 rephrase (1) 133:23 rephrase (1) 133:23 rephrase (1) 133:23 rephrase (1) 144:4 requests (2) 227:17;247:14; 187:14; 1	relation (4)	231:1,12,16;232:10,	reporting (6)	19:1;30:7;61:3,9;	252:20;270:4
223:24;226:6 19,20;237:14;240:17; 110:23;252:8;267:12 91:18:92:3;96:18; 122:185:24;191:11; 109:34;252:8;267:12 19:18:92:3;96:18; 19:52:2;232:7 111:5;225:17;246:8, 19:52:2;232:7 111:5;225:17;246:8, 19:72:24;137:17; 129:25 111:5;225:17;246:8, 19:72:24;137:17; 129:25 111:5;225:17;246:8, 19:72:24;137:17; 129:25 111:5;225:17;246:8, 19:72:24;137:17; 129:25 111:5;225:17;246:8, 19:72:24;137:17; 129:25 111:5;225:17;246:8, 19:72:24;137:17; 129:25 111:5;225:17;246:8, 19:72:24;137:17; 129:25 111:5;225:17;246:8, 19:72:256:4 19:72	114:19:206:25:	11.16:233:2.13.15.15.	26:12:58:14:86:3:	68:12:69:16:88:7:	retire (1)
relations (1) 91:11 relationship (7) 63:13;66:667:3; 86:3;105:20:112:22; 232:7 relationships (1) 58:14 reminded (2) 912:92:5 reminded (3) 99:12;92:5 reminding (1) 50:14 relative (1) 113:20;267:11 relative (1) 12:24:143:22 renewal (1) 12:24:143:22 renewal (1) 177:14 relative (1) 185:16 relaying (1) 177:14 repaire (1) 185:16 relaying (1) 241:17 relevance (1) 21:24:17 relevance (1) 159:2 repaire (1) 159:13 relevant (4) 41:19:85:6;126:8; 180:21 repaire (1) 133:23 repeated (5) 133:23;14:235:2; repaired (1) 133:23 repeated (5) 133:23;14:235:2; requested (6) 177:17 repaired (1) 133:23 repaired (1) 177:17 repaired (1) 133:23 repaired (1) 177:17 repaired (1) 133:23 repaired (5) 66:25 remedidate (2) 53:16;168:22 replaced (1) 14:4 remembering (1) 132:11;136:17;139:7, 21;22;185:22;43:11:1; respocitive (6) respective (1) responding (2) respective (6) responsibilities (4) reproved (5) responsibilities					
Pi:11					
relationship (7)					
63:13;66:6;67:3; remembering (1) 15;102:3,9,11;103:6; 257:13;272:3 respective (6) retriement (1) 29:12;92:5 reminded (2) 19 24:1,5;72:18,22; 224:23 respective (3) 170:13,17 return (1) 146:14 retaitive (1) 9:8 remeder (1) 29:2;266:4 responding (2) 146:10 retaitive (1) 13:20;267:11 Renee (2) 25:4;40:5;265:2 represents (3) 5:25;204:4;28:1;137:1 return (1) 146:14 retaitive (1) 12:24;143:22 representing (3) 25:4;40:5;265:2 responding (2) 146:10 retaitive (1) 12:24;143:22 represents (3) 5:25;204:4;217:3; 88:16;89:5;5,6,14,19; 48:6 renewal (1) 177:14 reputation (1) 270:20,24;271:3 238:14;256:24; 93:15,16,18,23;95:3, 185:16 renewed (1) 267:17 responsibilities (4) 182:20,23;183:2,5,22; 23:24 retirement (1) 12:27:18,19; 12:21:18,19; 12:21:18,19; 12:21:18,19; 12:21:18,19; 13:15;182:1 159:13 235:14;237:3,4; responsibility (1) 133:15;182:1 repeatedly (1) 133:15;182:1 repeatedly (1) 133:23 235:14;237:3,4; responsibility (3) 133:15;182:1 repeatedly (1) 133:23 215:20 responsibility (3) 16:20;21;98:8; restaurants (6) 25:15 remarks (1) 6:3 replaced (1) 12:21;24:14; 13:16 remain (1) 133:23 replaced (1) 12:21;24:14; 13:16 remain (1) 133:23 replaced (1) 10:22;198:8; restaurants (6) 25:15 remediate (2) 53:16;168:22 replaced (1) 209:14;263:11 249:13;16 Richard (3) Richard					
86:3;105:20;112:22; 229:22 reminded (2) 111:5;225:17;246:8, 19 respective (6) 24:1,5;72:18,22; retirement (1) 224:23 return (1) 224:23 return (1) 224:23 return (1) 146:14 return (1) 146:14 return (1) 224:23 return (1) 146:14 return (1) 146:10 return (1) 146:10 return (1) 146:10 return (2) 25:4;40:5;265:2 response (6) 39:7,19;86:14,16; return (2) 39:7,19;86:14,16; response (6) 39:7,19;86:14,16; return (1) 126:10 return (1) 126:10 return (1) 126:11 return (1) 126:11 return (1) 126:11 return (1) 126:11 return (1) 124:11 return (1) 124:11 return (1) 124:11 return (1) 124:11 126:12 128:11 128:12					
232:7 relationships (1) 9:12:92:5 represent (3) 5:14;28:3;112:11 responded (3) 74:24;128:1;137:1 returned (1) 146:14 relative (1) 9:8 represented (2) 29:2;266:4 responding (2) 161:2;26:8 return (1) 146:10 relatively (2) 13:20;267:11 Renee (2) 25:4;40:5;265:2 represents (3) 77:24 renewal (1) 77:14 renewed (1) 267:17 responding (2) 161:2;26:8 response (6) 39:7,19;86:14,16; responsibilities (4) 5:25;204:4;217:3; 88:16;89:5,5,6,14,19; 270:20,24;271:3 238:14;256:24; 93:15,16,18,23;95:3, 10;101:4,7;120:21; 267:17 responsibilities (4) 18:2:0,23;183:2,5,22; 23:24:17 77:24:17 repair (2) 158:17,25 request (15) repairs (1) 159:2 17:18,19; 127:2;195:4;198:16, 129:3;156:25;157:22; 16:20;38:23;39:4, 11:92:19 reviewed (5) repairs (1) 124:17,25;125:5; request (6) 21:25;24:13;181:1; 17:2:3 reviewed (2) responsible (4) 21:25;24:13;181:1; 17:2:3 reviewed (2) responsible (4) 21:25;24:13;181:1; 17:2:3 retirned (1) 17:20:11; 16:10 repairs (1) 16:12;26:8 responsibilities (4) 16:12;26:8 responsibilities (4) 18:2:0,23;183:2,5,22; 27:16;140:14; 17:27;194:21 responsibilities (4) 16:20;38:23;39:4, 17:27;194:21 responsibility (7) 26:12;85:8;115:8; 11:92:19 reviewed (5) 16:20;38:23;39:4, 17:27;195:41;18:1; 17:22:195:41;18:1; 17:22:195:41;18:1; 17:22:195:41;18:1; 17:22:3 responsible (4) 21:25;24:13;181:1; 17:22:3 responsible (4) 21:25;24:13;181:1; 17:22:3 reviewed (5) 16:20;38:23;39:4, 17:22:3	63:13;66:6;67:3;	remembering (1)	15;102:3,9,11;103:6;	257:13;272:3	224:17
232:7 relationships (1) 9:12;92:5 represent (3) 5:14;28:3;112:11 responded (3) 74:24;128:1;137:1 returned (1) 146:14 relative (1) 9:8 representing (3) 12:24;143:22 represents (3) 25:4;40:5;265:2 represents (3) 13:20;267:11 Renee (2) 25:4;40:5;265:2 represents (3) 270:20;24;271:3 238:14;256:24; 93:15,16,18,23;95:3, 12:11 responding (2) 146:10 relatives (1) 12:24;143:22 represents (3) 270:20;24;271:3 238:14;256:24; 93:15,16,18,23;95:3, 12:11 responsibilities (4) 5:25;204:4;217:3; 88:16;89:5,5,6,14,19; 267:17 responsibilities (4) 5:25;204:4;217:3; 238:14;256:24; 93:15,16,18,23;95:3, 10:101:47;120:21; responsibility (7) 26:12;85:8;115:8; 12:23;136:25;157:22; 16:20;38:23;39:4, 17:27;194:21 reviewed (5) repairs (1) 159:2 127:22;195:4;198:16, 20:24;215:18; 19:219 reviewed (5) repairs (1) 133:15;182:1 17:13;154:16; 238:14;241:12 242:1 12:23;23 return (1) 133:23 215:20 requested (6) 171:17 repaired (1) 133:23 215:20 repaired (1) 133:23 215:20 repaired (1) 133:23 return (1) remain (1) 133:23 return (1) repaired (1) repaired (1) repaired (2) responsible (4) responsible (86:3:105:20:112:22:		111:5:225:17:246:8.	respective (6)	retirement (1)
relationships (1) 9:12;92:5 represent (3) 170:13,17 return (1) 146:14 relative (1) 9:8 5:14;28:3;112:11 responded (3) 74:24;128:1;137:1 return (1) 146:14 relatively (2) 6:21 representing (3) 161:2;216:8 returned (1) 146:10 relatives (1) 12:24;143:22 representing (3) 5:52;204:4;217:3; 88:16;89:5,5,6,14,19; relatives (1) 177:14 represents (3) 5:25;204:4;217:3; 88:16;89:5,5,6,14,19; relayed (1) 177:14 reputation (1) 271:25 10;101:4,7;120:21; relaying (1) 97:7 Requeral (2) 57:16;140:14; 182:20,23;183:2,5,22; relaying (1) 97:7 Requeral (2) 57:16;140:14; 182:20,23;183:2,5,22; relevance (1) 158:17,25 request (15) 102:17,18,19; responsibilities (4) reviewed (5) relied (3) repaired (1) 127:21;195:4;198:16, 129:3;156:25;157:22; review (7) relied (3) repaced (5) 238:14;237:3,4; responsible (4) responsible (4) 18:					
58:14 relative (1) reminding (1) 5:14;28:3;112:11 represented (2) responded (3) 146:14 returned (1) 50:14 relative (1) 9:8 render (1) 29:2;266:4 representing (3) responding (2) 146:10 113:20;267:11 relatives (1) 12:24;143:22 representing (3) response (6) 39:7,19;86:14,16; response (6) 48:6 renewal (1) 12:24;143:22 represents (3) 270:20,24;271:3 238:14;256:24; 93:15,16,18,23;95:3, reputation (1) 88:16;89:5,5,6,14,19; 271:25 repossibilities (4) relaying (1) 97:7 Requeral (2) 181:17;186:5 repossibilities (4) 77:27;194:21 reviewed (5) relevance (1) 158:17,25 repaired (1) 102:17;18,19; 16;219:3;156:25;157:22; 16:24;13:18:1; 16:2;216:8 responsibility (7) 16:2;20;3;183:2,5,22; 237:24 reviewed (5) relevant (4) 159:2 repaired (1) 102:17;18,19; 129:3;156:25;157:22; 158:12 repaired (5) 126:14;237:3,4; 237:3,4; 238:14;237:3					
relative (1) 9:8 render (1) represented (2) 74:24;128:1;137:1 responding (2) returned (1) relatively (2) 6:21 representing (3) 161:2;216:8 responding (2) review (25) relatives (1) 12:24;143:22 represents (3) 25:4;40:5;265:2 response (6) 39:7,19;86:14,16; review (25) relayed (1) 177:14 reputation (1) 270:20,24;271:3 reputation (1) 238:14;256:24; p3:15,16,18,23:95:3, reputation (1) 10;101:4,7;120:21; responsibilities (4) 182:20,23;183:2,5,22; responsibilities (4) 182:20,23;183:2,5,22; request (15) 181:17;186:5 request (15) responsibilities (4) 182:20,23;183:2,5,22; request (15) 182:17;18,19; reviewed (5) reviewed (5) </td <td></td> <td></td> <td></td> <td></td> <td></td>					
50:14 relatively (2) render (1) 29:2;266:4 responding (2) 146:10 review (25) 113:20;267:11 relatives (1) Renee (2) 25:4;40:5;265:2 response (6) 39:7,19;86:14,16; review (25) 48:6 renewal (1) 270:20,24;271:3 238:14;256:24; 93:15,16,18,23;95:3, repustion (1) 88:16;89:5,5,6,14,19; 271:25 10;101:4,7;120:21; 18;16; 140:14; 172:21; 182:20; 172:7;194:21 182:20,23;183:2,5,22; 272:21; 172:7;194:21 responsibilities (4) 182:20,23;183:2,5,22; 272:21; 172:7;194:21 reviewed (5) 182:20,23;183:2,5,22; 272:21; 172:7;194:21 reviewed (5) 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 172:7;194:21 reviewed (5) 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 172:7;194:21 reviewed (5) 16:20;38:23;39:4, 11;92:19 16:20;38:23;39:4, 11;92:19 172:7;194:21 reviewed (5) 16:20;38:23;39:4, 11;92:19 172:21;95:4;198:16, 129:3;156:25;157:22; 129:19 16:20;38:23;39:4, 11;92:19 172:23 172:23 65:16;66:21,23; 129:19 158:12 158:12 172:23 172:23 172:23 172:23 172:23					
relatively (2) 6:21 representing (3) 161:2;216:8 review (25) 39:7,19:86:14,16; relatives (1) 12:24;143:22 represents (3) 25:4;40:5:265:2 response (6) 39:7,19:86:14,16; 48:6 renewal (1) 270:20,24;271:3 238:14;256:24; 93:15,16,18,23;95:3, relayed (1) 177:14 reputation (1) 271:25 10;101:4,7;120:21; 185:16 renewed (1) 267:17 responsibilities (4) 57:16;140:14; 223:7:24 relaying (1) 97:7 Requeral (2) 57:16;140:14; 182:20,23;183:2,5,22; 241:17 repair (2) 181:17;186:5 responsibilities (4) 182:20,23;183:2,5,22; 206:17 repaired (1) 102:17,18,19; 26:12,85:8;115:8; reviewed (5) relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviewed (5) 41:19;85:6;126:8; repairs (1) 235:14;237:3,4; responsible (4) 83:15;86:18,9:12; relicid (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 relying (1) 133:15;	` /				
Table Tabl	50:14	render (1)	29:2;266:4	responding (2)	146:10
Table Tabl	relatively (2)	6:21	representing (3)	161:2:216:8	review (25)
relatives (1) 12:24;143:22 represents (3) 5:25;204.4;217:3; 88:16;89:5,5,6,14,19; 48:6 renewal (1) 270:20,24;271:3 238:14;256:24; 93:15,16,18,23;95:3, relayed (1) 177:14 reputation (1) 238:14;256:24; 93:15,16,18,23;95:3, relaying (1) 97:7 Requeral (2) responsibilities (4) 182:20,23;183:2,5,22; relaying (1) 158:17,25 request (15) responsibility (7) reviewed (5) relevance (1) 158:17,25 request (15) responsibility (7) 26:12;85:8;115:8; 11;92:19 relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviewed (5) 4:1:9;85:6;126:8; 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 responsible (4) 83:15;86:1;89:12; relying (1) 133:15;182:1 17:13;154:16; responsive (1) 18:7;194:1 remain (1) 133:23 replaced (1) requesting (4) restaurants (6) rewrite (1) remediate (2) 14:4 <td></td> <td></td> <td></td> <td></td> <td></td>					
48:6 renewal (1) 270:20,24;271:3 238:14;256:24; 93:15,16,18,23;95:3, relayed (1) 177:14 reputation (1) 271:25 10;101:4,7;120:21; relaying (1) 97:7 Requeral (2) 57:16;140:14; 182:20,23;183:2,5,22; 241:17 repair (2) 158:17,25 request (15) 77:194:21 reviewed (5) relevance (1) 158:17,25 request (15) 102:17,18,19; 26:12;85:8;115:8; 11;92:19 relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviewed (5) 41:19;85:6;126:8; 159:13 235:14;237:3,4; responsibility (7) 16:20;38:23;39:4, 180:21 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 17:223 relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 remain (1) 133:23 rephrase (1) requesting (4) 6:17 rest (2) 174:20 remarks (1) 6:3 replaced (
relayed (1) 177:14 reputation (1) 271:25 10;101:4,7;120:21; relaying (1) 97:7 Requeral (2) 57:16;140:14; 237:24 relaying (1) repair (2) 181:17;186:5 responsibilities (4) 57:16;140:14; 237:24 relevance (1) 158:17,25 request (15) responsibilities (7) reviewed (5) 206:17 repaired (1) 102:17;18,19; 26:12;85:8;115:8; 16:20;38:23;39:4, relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviewed (5) 180:21 repairs (1) 20,24;215:1,8; 158:12 reviewes (7) relied (3) repeated (5) 238:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 17:223 relying (1) 133:15;182:1 17:13;154:16; responsive (1) 18:7;194:1 remain (1) 133:23 rephrase (1) requesting (4) 6:17 restaurants (6) 25:15 remediate (2) 14:4 replaced (1) 202:14;20					
185:16 renewed (1) 267:17 responsibilities (4) 182:20,23;183:2,5,22; relaying (1) 97:7 Requeral (2) 57:16;140:14; 237:24 relevance (1) 158:17,25 request (15) responsibility (7) 26:12;85:8;115:8; reviewed (5) relevant (4) 159:2 102:17,18,19; 26:12;85:8;115:8; 11;92:19 41:19;85:6;126:8; 159:2 127:22;195:4;198:16, 158:12 reviews (7) 41:19;85:6;126:8; 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 remain (1) 133:23 215:20 rest (2) 174:20 remarks (1) 6:3 replaced (1) 102:22;198:8; restaurants (6) 25:15 remediate (2) remediate (2) 14:4 requests (2) 227:17;247:14; Richard (3) 53:16;168:22 replacement (1) 209:14;263:11 249:13,16					
relaying (1) 97:7 Requeral (2) 57:16;140:14; 237:24 relevance (1) 158:17,25 request (15) responsibility (7) 16:20;38:23;39:4, 206:17 repaired (1) 102:17,18,19; 26:12;85:8;115:8; 11;92:19 relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviews (7) 41:19;85:6;126:8; 159:13 20,24;215:1,8; 158:12 65:16;66:21,23; 180:21 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 relying (1) 133:15;182:1 171:13;154:16; responsible (4) 18:7;194:1 repaired (1) 133:15;182:1 172:23;25;24:13;181:1; 172:23 relied (3) repated (5) 117:13;154:16; 18:7;194:1 relied (3) repeated (5) 133:15;182:1 172:23 relied (5) 133:15;182:1 117:13;154:16; 18:7;194:11 responsible (4) 18:7;194:21 18:7;194:21 responsible (5)					
relaying (1) 97:7 Requeral (2) 57:16;140:14; 237:24 relevance (1) 158:17,25 request (15) responsibility (7) 16:20;38:23;39:4, 206:17 repaired (1) 102:17,18,19; 26:12;85:8;115:8; 11;92:19 relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviews (7) 41:19;85:6;126:8; 159:13 20,24;215:1,8; 158:12 65:16;66:21,23; 180:21 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 relying (1) 133:15;182:1 171:13;154:16; responsible (4) 18:7;194:1 repaired (1) 133:15;182:1 172:23;25;24:13;181:1; 172:23 relied (3) repated (5) 117:13;154:16; 18:7;194:1 relied (3) repeated (5) 133:15;182:1 172:23 relied (5) 133:15;182:1 117:13;154:16; 18:7;194:11 responsible (4) 18:7;194:21 18:7;194:21 responsible (5)	185:16	renewed (1)	267:17	responsibilities (4)	182:20,23;183:2,5,22;
241:17 repair (2) 181:17;186:5 172:7;194:21 reviewed (5) relevance (1) 158:17,25 request (15) responsibility (7) 16:20;38:23;39:4, 206:17 repaired (1) 102:17,18,19; 26:12;85:8;115:8; 11;92:19 relevant (4) 159:2 127:22;195:4;198:16, 26:12;85:8;115:8; 129:3;156:25;157:22; 41:19;85:6;126:8; 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 relying (1) 133:15;182:1 117:13;154:16; 242:1 responsive (1) 18:7;194:1 remain (1) 133:23 215:20 rest (2) 174:20 remain (8) rephrase (1) requesting (4) 169:8;249:9 rewrite (1) remediate (2) 14:4 requests (2) 227:17;247:14; Richard (3) 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3) <td>relaying (1)</td> <td>97:7</td> <td>Requeral (2)</td> <td></td> <td>237:24</td>	relaying (1)	97:7	Requeral (2)		237:24
relevance (1) 206:17 repaired (1) 158:17,25 repaired (1) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; 180:21 relied (3) 62:17,19,20 relying (1) 133:15;182:1 remain (1) 133:23 remains (1) remain (1) remains (1) remarks (1) 66:25 remediate (2) 53:16;168:22 relevant (4) 159:13 request (15) 102:17,18,19; 126:12;85:8;115:8; 11;92:19 responsibility (7) 26:12;85:8;115:8; 11;92:19 reviews (7) responsible (4) 83:15;86:1;89:12; responsible (4) 83:15;86:1;89:12; responsible (4) 83:15;86:1;89:12; responsible (4) 171:17 repeatedly (1) 171:17 rephrase (1) 172:23 rephrase (1) 172:23 responsive (1) 187:194:1 responsive (1) 187:17;202:15,19; 6:17 responsive (1) 188:7;194:1 rewarding (1) 16:20;38:23;39:4, 11;92:19 reviews (7) 65:16;66:21,23; 158:12 responsible (4) 83:15;86:1;89:12; responsive (1) 18:7;194:1 rewarding (1) 16:20;38:23;39:4, 11;92:19 reviews (7) 65:16;66:21,23; 172:23 responsible (4) 172:23 revised (2) 174:20 responsive (1) 18:7;194:1 rewarding (1) 16:20;38:23;39:4, 11;92:19 reviews (7) 65:16;66:21,23; 172:23 responsible (4) 172:23 revised (2) 174:20 responsive (1) 18:7;194:1 rewarding (1) 16:20;38:23;39:4, 11;92:19 reviews (7) 65:16;66:21,23; 172:23 responsible (4) 18:7;194:1 responsive (1) 18:7;194:1 rewarding (1) 16:20;38:23;39:4, 11;92:19 reviews (7) 65:16;66:21,23; 172:23 responsible (4) 172:23 responsive (1) 18:7;194:1 responsive (1) 18:7;194:1 rewarding (1) 18:7;194:1 replaced (1) 197:17;202:15,19; 202:14;204:19 132:14;163:8; rewritten (1) 18:7 Richard (3)	• 0 . ,				
206:17 repaired (1) 102:17,18,19; 26:12;85:8;115:8; 11;92:19 relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviews (7) 41:19;85:6;126:8; repairs (1) 20,24;215:1,8; 158:12 65:16;66:21,23; 180:21 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 62:17,19,20 124:17,25;125:5; requested (6) 242:1 revised (2) relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) <td></td> <td></td> <td></td> <td></td> <td></td>					
relevant (4) 159:2 127:22;195:4;198:16, 129:3;156:25;157:22; reviews (7) 41:19;85:6;126:8; repairs (1) 20,24;215:1,8; 158:12 65:16;66:21,23; 180:21 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 62:17,19,20 124:17,25;125:5; requested (6) 242:1 revised (2) relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
41:19;85:6;126:8; repairs (1) 20,24;215:1,8; 158:12 65:16;66:21,23; 180:21 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 62:17,19,20 124:17,25;125:5; requested (6) 242:1 revised (2) relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
180:21 159:13 235:14;237:3,4; responsible (4) 83:15;86:1;89:12; relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 62:17,19,20 124:17,25;125:5; requested (6) 242:1 revised (2) relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 62:17,19,20 124:17,25;125:5; requested (6) 242:1 revised (2) relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)	41:19;85:6;126:8;	repairs (1)			65:16;66:21,23;
relied (3) repeated (5) 238:14;241:12 21:25;24:13;181:1; 172:23 62:17,19,20 124:17,25;125:5; requested (6) 242:1 revised (2) relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)	180:21	159:13	235:14;237:3,4;	responsible (4)	83:15;86:1;89:12;
62:17,19,20 124:17,25;125:5; requested (6) 242:1 revised (2) relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
relying (1) 133:15;182:1 117:13;154:16; responsive (1) 18:7;194:1 remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
135:10 repeatedly (1) 197:17;202:15,19; 6:17 rewarding (1) remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
remain (1) 133:23 215:20 rest (2) 174:20 171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
171:17 rephrase (1) requesting (4) 169:8;249:9 re-write (1) remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
remarks (1) 6:3 102:22;198:8; restaurants (6) 25:15 66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)	171:17	rephrase (1)	requesting (4)	169:8;249:9	re-write (1)
66:25 replaced (1) 202:14;204:19 132:14;163:8; rewritten (1) remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
remediate (2) 14:4 requests (2) 227:17;247:14; 18:7 53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
53:16;168:22 replacement (1) 209:14;263:11 249:13,16 Richard (3)					
remedy (1) 114:25 require (2) restitution (1) 110:11;230:20;			*		
	remedy (1)	114:25	require (2)	restitution (1)	110:11;230:20;
	L				I

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 300 of 362
Bostock v. Video Deposition Septem **Colin Slay September 10, 2021**

267:24	146:1;149:17,18,22;	163:22;167:21;205:9;	saying (39)	162:16
rid (2)	150:6;151:4,18,21,22,	210:12;211:4;267:11	23:2;27:12;61:24;	Seems (8)
45:16;83:9	23;152:11;153:3,4;	rose (1)	79:24;80:19,19;	147:9;159:3;
right (495)	154:9;155:24;156:3;	70:25	112:10;124:12;130:4;	196:13,17;222:4;
5:20;6:6,12,19;	160:2;161:12;163:17,	rotate (1)	132:17:147:12;	254:4;258:6,22
7:13;8:14,20;9:3,6,7,	23;164:2,8;165:16;	178:16	152:17,147.12,	self (1)
20,22;11:11,14;	166:10;167:6,19;	rotates (1)	152:19,134:24,	63:4
13:11;14:1,5,21;15:5,	168:4,6,10,16,24;	42:1	159:24;163:11,15;	self-evaluation (1)
8;16:20;17:5,16,17,	169:5,8,13,17,22,23;	routine (1)		
			188:11;193:21;	87:1
24;19:18;20:5,6,19,	170:4,9,19;171:5,6,9,	121:4	196:14;205:21;	sell (1)
23;22:5,11,16,25;	10;172:13;174:3;	routinely (3)	207:18;213:16;	188:5
23:14;24:22;25:16,	175:1,11,17;176:2,23;	37:13,14;221:13	227:25;229:23;	seminars (2)
24;26:9,19,23;27:2,3;	177:7,11,16;178:7,10,	rule (2)	243:19;244:24;	52:14;54:11
28:18,21;29:11,18;	11,13,20,25;180:12;	37:25;92:3	246:17,18;248:25;	send (4)
30:2;31:8,10;33:1,5,	181:11;183:14,15;	rules (3)	249:23,25;251:7;	174:11;203:24;
10;34:4,6,11;35:6,12,	187:11;188:3,20;	21:21;27:18;92:5	258:22;259:13;266:2	215:6;272:19
16,20;36:10,17,18,23,	189:1,6,9;190:5,14;	run (6)	scale (1)	sending (2)
24;37:3,25;38:7,9,14,	192:1,1,6;193:4,6,9;	11:2;20:21;49:15;	68:21	84:14;92:9
18,25;39:23;40:20;	194:13,21,24,25;	71:8;142:2;212:8	scattered (1)	senior (1)
43:17;45:12;46:8;	195:1,2,19,20;196:1;	runaway (1)	50:20	54:17
47:1,8,11,14;50:25;	197:1,24;199:14;	11:15	scheduled (3)	sense (4)
51:19;52:6;55:22,22;	200:12;201:1,22;	running (1)	96:11;232:2;235:20	6:4;53:24;258:23;
58:2,3,12;59:9,10,14,	203:2,19,25;204:6,11,	234:7	scholarship (1)	260:9
20,24;60:15;62:25;	12;208:2,3,17;210:1,		54:2	sensitive (2)
63:2,11;64:2;65:10,	6,9;211:6;212:19;	S	school (3)	264:25;265:3
17,22;66:3,7,14,18;	213:15;214:6,8,11;		51:7,8;209:17	sent (20)
67:4,9,18,25;68:7,11,	216:10,23;217:17,20;	Sabrina (15)	scope (9)	23:25;72:17;80:15;
16;71:6,14;73:9,13,	218:2,17;219:3,3;	9:3,11,17;109:1;	18:19,25;35:1,18,	118:23;170:13;198:7,
21,25;74:4,16;76:13,	220:7,19;222:10,24;	120:14;145:19;	18;36:5;114:21;	14,16;202:13;203:20;
21,25;77:2,5,6,11,21;	223:6,10,13;224:2,4,	146:12,14;151:7;	125:14;238:25	204:18;205:20;213:9,
78:2,16;79:17,24,25;	16,19;228:13;229:24;	157:3,13,22;184:3;	score (3)	16,20;214:2,6,22;
	230:19;231:5,16;	185:16,17	87:9,12;91:6	220:10;236:13
XU'3 N TU 77'XT'T7				
80:5,6,10,22;81:12,				
15,18,19,24;82:7,25;	232:6,7,18;234:7,8;	Sabrina's (1)	screened (2)	sentence (2)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21,	232:6,7,18;234:7,8; 236:4,4;239:10;	Sabrina's (1) 129:10	screened (2) 75:25;183:5	sentence (2) 73:5;132:13
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20;	Sabrina's (1) 129:10 saddened (1)	screened (2) 75:25;183:5 se (8)	sentence (2) 73:5;132:13 separate (31)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24;	Sabrina's (1) 129:10 saddened (1) 269:1	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1;	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24;
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4,	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2)	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23;	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2,
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22;
15,18,19,24,82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2)	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10;
15,18,19,24,82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23;
15,18,19,24,82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15,	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2)	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8;
15,18,19,24,82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18,	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10;
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31)	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17,
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17;	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18,	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12;	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10;	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11,	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10,	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23;
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6;	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1)	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8,	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1)	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17;
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2)	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1)	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7)	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2)	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25; 133:1,8,9,21;134:4,	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18; 182:12,14;183:23;	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21 saw (16)	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1) 102:8	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2) 159:24;163:20
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25; 133:1,8,9,21;134:4, 13,21,23;135:25;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18; 182:12,14;183:23; 184:1	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21 saw (16) 9:24;99:25;121:18;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1) 102:8 seeking (2)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2) 159:24;163:20 serve (7)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25; 133:1,8,9,21;134:4, 13,21,23;135:25; 136:3,3;137:3,19;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18; 182:12,14;183:23; 184:1 roles (3)	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21 saw (16) 9:24;99:25;121:18; 140:5;160:5;223:22,	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1) 102:8 seeking (2) 138:9;204:10	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2) 159:24;163:20 serve (7) 23:10;75:7,21,23,
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25; 133:1,8,9,21;134:4, 13,21,23;135:25; 136:3,3;137:3,19; 139:10;140:7,12;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18; 182:12,14;183:23; 184:1 roles (3) 75:20,22;172:7	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21 saw (16) 9:24;99:25;121:18; 140:5;160:5;223:22, 25;224:16;231:7,25;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1) 102:8 seeking (2) 138:9;204:10 seem (3)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2) 159:24;163:20 serve (7) 23:10;75:7,21,23, 25;149:3;182:10
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25; 133:1,8,9,21;134:4, 13,21,23;135:25; 136:3,3;137:3,19; 139:10;140:7,12; 141:9;142:1,2,14,22;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18; 182:12,14;183:23; 184:1 roles (3) 75:20,22;172:7 room (9)	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21 saw (16) 9:24;99:25;121:18; 140:5;160:5;223:22, 25;224:16;231:7,25; 242:24;243:7,25;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1) 102:8 seeking (2) 138:9;204:10 seem (3) 125:7;250:3;251:9	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2) 159:24;163:20 serve (7) 23:10;75:7,21,23, 25;149:3;182:10 served (9)
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25; 133:1,8,9,21;134:4, 13,21,23;135:25; 136:3,3;137:3,19; 139:10;140:7,12;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18; 182:12,14;183:23; 184:1 roles (3) 75:20,22;172:7	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21 saw (16) 9:24;99:25;121:18; 140:5;160:5;223:22, 25;224:16;231:7,25;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1) 102:8 seeking (2) 138:9;204:10 seem (3)	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2) 159:24;163:20 serve (7) 23:10;75:7,21,23, 25;149:3;182:10
15,18,19,24;82:7,25; 83:1,22,23;85:12,21, 22;86:7,25;87:1,2,10, 14,22,23;88:4,24; 89:2;90:7;91:1,4,7,8, 11,12,16;92:1,20; 93:7,12,13;94:2,3; 95:3,9,11,12,20,25; 96:8,9;97:2,8,11,12; 98:1,10,12,16,20; 99:4,10,24;100:15,17; 105:8;106:15,19; 109:3,6,7,9,17; 110:20,21,24;111:2,3; 112:1,3,8,18,20; 113:2,16;114:8,9,10; 115:4,15,20;116:10, 13,14,24;117:4,5,5; 119:8;120:1,16,24; 121:10;123:17;124:2, 22;125:9,16,24;126:8, 17,21,25;127:1,4,7, 12,17,19;128:2,5,8, 19,23;129:10;130:11, 14;131:6;132:18,25; 133:1,8,9,21;134:4, 13,21,23;135:25; 136:3,3;137:3,19; 139:10;140:7,12; 141:9;142:1,2,14,22;	232:6,7,18;234:7,8; 236:4,4;239:10; 240:3,4,13,14,20; 241:14,20;242:24; 243:2;244:11;246:4, 22;247:7;249:2,6; 250:1,2,20;251:3,18; 252:9,18,21;253:19; 256:2,8;257:4,13,15, 25;258:24;259:6,18, 19;260:3,4,13;262:3; 263:1,23;264:7,25; 265:8,9;266:13,19; 267:18,21;268:25; 269:12,19;270:4,11, 12,14,15;271:5,7,17; 272:9,9,13,13,22 risk (1) 267:15 Riverdale (1) 51:5 Road (2) 47:5;207:19 role (7) 59:3;149:4;172:18; 182:12,14;183:23; 184:1 roles (3) 75:20,22;172:7 room (9)	Sabrina's (1) 129:10 saddened (1) 269:1 safe (2) 153:19;154:21 sake (2) 114:1;270:23 salary (2) 64:22;223:19 same (31) 34:3,22;35:7;59:7; 94:2;97:12;124:18, 25;125:1;134:6; 141:14;147:3;148:10, 20;163:21;170:8; 172:9,12;183:10; 186:17;198:24;213:8, 13,14;214:6;218:3; 227:20;229:22; 233:17;247:4;254:8 sanctioned (1) 26:21 satisfactory (2) 99:7,21 saw (16) 9:24;99:25;121:18; 140:5;160:5;223:22, 25;224:16;231:7,25; 242:24;243:7,25;	screened (2) 75:25;183:5 se (8) 7:5;14:14;22:1; 43:5;96:20;103:23; 237:13;259:25 season (1) 201:20 Seattle (1) 52:14 second (10) 88:22;91:17; 128:11;143:8;144:12; 170:11;180:10; 199:25,25;262:5 Section (4) 72:9;169:24;240:6; 246:24 sections (1) 153:6 secured (2) 153:19;154:21 Seeing (2) 121:5;272:14 seek (1) 102:8 seeking (2) 138:9;204:10 seem (3) 125:7;250:3;251:9	sentence (2) 73:5;132:13 separate (31) 7:15;8:6;21:24; 27:1;30:11,18;31:2, 15;33:2;34:15;77:22; 96:19;110:23;119:10; 128:14;129:23; 176:17;195:13;212:8; 234:20,23;235:10; 250:14,14,15,15,17, 21,22;251:4;253:21 separated (1) 245:1 separately (5) 97:18;98:4;170:23; 179:12;235:7 separation (4) 19:25;244:9,14,24 September (5) 5:2;42:16,17; 202:22;204:24 series (1) 143:24 serious (2) 159:24;163:20 serve (7) 23:10;75:7,21,23, 25;149:3;182:10 served (9)

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 301 of 362 Bostock v. Video Deposition Septem Colin Slay September 10, 2021

share (4) 11 268:6,7,9,12 5;183:13;191:16; 191:13;197:20;199:4 151:25;168:8; signature (7) socialize (1) 210:18;213:10,14; 233:20;236:20; 217:5;221:13 73:23;88:23,24; 209:4 218:9;225:3,24; 242:17;257:15 shared (11) 89:1;91:3;106:13,15 softball (41) 243:13;251:22 specifics (6) 43:10;103:10,14; signatures (1) 36:3,8;75:3,13; sort (36) 17:25;113:18;	Clayton County September 10, 2021					
155:19182:13	26.2.75.15.152.23.	Shelley (4)	244.18	solely (1)	225.21	
212:13 Shetton (1) 130:21:139:17; solid (1) 161:220:32:61:14; 246:13 service (5) 184:8.10 272:4 53:61:74:20; 175:11.12:24:8 service (2) 184:8.10 272:4 53:62:179:11.12:24:8 service (2) 191:22:32:52:4:10; 45:20:148:11; 45:20:148:11; 26:22:108:21; 120:19:147:7.8 staff) (1) 121:91:33:20:150:21; 120:19:147:7.8 staff) (1) 26:138:170:22; 120:19:147:8 staff) (1) 26:138:170:22; 120:19:147:8 staff) (1) 148:25 staff) (1) 14						
212:13 service (1) 246:13 service (5) 133:6174:20; 1575:11,12:248:8 services (21) 1:12:223:25:24:10; 72:14;11:14:18:116:19; 20:16:225:17:26:55 service (5) 1:12:223:25:25:24:10; 21:19:133:20:16:225:17:26:55 service (21) 1:12:23:25:25:24:10; 21:19:133:20:16:225:17:26:55 service (22) 1:10:12:23:25:25:24:10; 22:16:23:25:10; 23:24:194:24; 22:12:25:245:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:10; 246:13:25:12:25:25:10; 246:25:17:25:55 sets (1) 139:99;14:10:25:15:25:15 sets (1) 131:12 21:16:248:25 showed (6) 26:22:18:25:16:248:8 shows (4) 26:22:17:28:28:16:23:26:10; 246:25:17:16:23:26:19:24:10; 25:20:25:20:12:25:20:15; 25:20:12:25:20:15; 25:20:20:20:20:20:20:20:20:20:20:20:20:20:						
246:13 service (5)						
Service (5) 134-81-10 28-98-95-158-21; 153-6174-20; 175-11,172-244-8 58-07-168-111-10; 172-123-25-23-10; 24-10-168-211-10; 172-121-121-10-1622; 16-18-187-10; 12-19-176-22; 18-32-19-14-24; 22-123-23-10; 24-12-12-12-12-12-12-19-176-22; 18-32-19-14-24; 22-12-32-24-10; 24-12-32-12-12-12-12-12-12-12-12-12-12-12-12-12		.,				
153:6,174:20; 153:2,179:18; 234:2,145:2; 272:4 250:2,175:11,122; 232:5,24:10; 72:17; 143:18; 161:19; 200:16:2,15:17; 267:5; 161:18; 170:12; 172:19:135:2,170:12; 132:2,15:10; 246:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:10; 266:1,32:54:7,25:10; 266:1,32:54:7,25:10; 266:1,32:54:10; 266:1,32:34:10; 266:1,34:11; 266:1,34:1						
272.14 services (21) 11.22.23.25.24.10 45.20.148.11; 27.217.114.18.116.19; 121.91.33.20.156.21; 15.20.12.172.19.176.22; 16.18.1170.12; 16.18.170.12; 17.219.176.22; 18.32.24.194.24; 221.25.24.25.10; 24.61.32.24.7.256.10; 26.13.23.47.256.10; 26.13.24.17.256.						
		` ,			-	
11/22/23/25/24/10/42/1 24/26/23/33/20/15/25/21 24/26/23/33/20/15/25/21 24/26/23/33/20/15/25/21 24/26/23/23/33/20/15/25/21 24/26/23/23/23/23/23/23/23/23/23/23/23/23/23/					` /	
20016215:172-67:5 141:19.20:197:17; 250:12.25:310 250:12.25:310 250:12.25:310 250:12.25:310 250:22.25:310 250:22.25:310 250:3184:11 246:13.2547.256:10; 246:13.2547.256:10; 246:13.2547.256:10; 246:13.2547.256:10; 266:22.188.21; 266:12.188.21; 266:12.188.21; 266:12.188.21; 266:12.188.21; 266:12.188.21; 266:12.188.21; 266:12.188.21; 266:12.188.21; 270:66:12.188						
1219-9132-0156-21; 106:22108-22; 106:22108-22; 106:221						
161:18:170:12; 106:22:108:21; 8ingled (2) 37:128:42:02:27:3 261:126:24:10; 221:25:245:10; 246:13:254:7;256:10, 261:3 88:16;868:93:7; 106:61:148:11; 194:13:197:24; 194:13:197:24; 194:13:197:24; 194:13:197:24; 199:14:202:60:515; 139:99,914:122; 139:99,914:122; 139:16:02:21:15; 139:09,914:122; 138:216:10:221:15 144:16.17:189:10; 148:25 8cts (1) 151:25:16248:8 8cts (2) 151:16248:8 8cts (2) 151:16248:8 8cts (2) 151:16248:8 8cts (2) 151:16248:8 8cts (2) 151:27:7 109:11:4 270:3 16:19:17 270:3 199:11:4 270:3 199:11:4 270:3 199:11:4 270:3 199:11:4 270:3 199:11:4 270:3 199:11:4 270:3 199:11:4 270:3 199:11:10:31:01:14; 199:11:12 270:3 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:14; 199:11:10:31:01:15; 260:20 200:10:21:17:58:6 220:10:29:20:10:29:20:10:29:20:10:29:20:10:29:20:10:29:20:10:10:10:11:11:19:29:13; 189:18; 202:12; 250:10:10:10:10:10:10:10:10:10:10:10:10:10						
172:19:176:22; 120:19:147:7.8 show (20) steroing (2) 221:25;245:10; 26:3184:11 194:13:197:24; 139:99:141:22; 139:99:141:22; 139:99:141:22:1; 139:10:22:137 139:99:141:22; 133:216:10:22:17 148:25 131:10:22:138:18; 131:10:22:138:18; 131:10:22:138:18; 131:10:22:138:18; 131:10:23:138:18; 144:16:17;189:10 showing (5) 191:12 steroing (1) 69:22:847;165:6; 215:16:248:8 steveral (15) 132:33:39:11:48:11; 54:1578:1:83:6.8,16, 18; 182:35; 183:23 183:23; 183:23 183:17:250:23; 131:10:22:138:18; 131:10:22:1						
183:24;194:24; 240:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;256:10; 246:13;254:7;258:9 246:13;254:7;258:12; 246:13;254:7;258:7;258:12; 246:13;254:7;258:7;258:12; 246:13;254:7;258:7;2						
246:13;2547;256:10; 26:13;84:11 serving (2) 149:13;197:24; 149:13;197:24; 1599;141:22; 166:61;1478;2190:21; 1599;141:22; 166:61;178;2190:21; 1599;149:202:62;05:15; 1399;9;141:22; 166:61;178;2190:21; 1594:62;5317;258:9 sets (1) 148:25 serving (1) 148:25 seven (1) 148:25 seven (1) 148:25 seven (1) 150:17 seven (1) 164:15;78;136:64; 159:14; 140:3;28:15;233:16 several (15) 13:23;39:11:48:11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 164:15;78;139;19;148; 11; 165:248; 149:14;149;149;149;149;149;149;149;149;149;1						
246:13:254-7;256:10; 26:13:26:13:254-7;256:10; 26:13:26:270:25 139:22;168:68:175:17; 26:3;184:11 199:143:197:24; 199:14; 2199:143:22; 199:14:22; 199:14:20:26:205:15; 2133:216:10:221:17 199:143:20:26:205:15; 2133:216:10:221:17 109:14:20:26:205:15; 2133:216:10:221:17 109:14:20:26:205:15; 2133:216:10:221:17 109:14:20:26:205:15; 2133:216:10:221:17 109:14:20:26:25:17; 258:9 131:10.22:138:18; 144:16.17; 189:10 148:25 showed (6) 69:22:84:7; 165:6; 215:16:248:8 showed (7) 69:22:84:7; 165:6; 270:6 11:8 showed (8) 11:8 showed (9) 11:8 showed (9) 11:8 showed (9) 11:8 showed (9) 11:8 showed (1) 11:8 str. (2) 104:25:17:16 str. (2) 104:21:17:18 11:25:15:16:248:8 showed (1) 49:11.12.13.14.18; exc (2) 104:52.17:16 sex (2) 104:52.17:16 sex (2) 104:52.17:16 shade (1) 243:12.15:238:12; 270:3 signators (1) 258:9 signators (1) 43:10; 103:10; 14; 199:213:11.23; 143:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:9;144:6;237:16 18:23 13:10:13:13:13:13:13:13:13:13:13:13:13:13:13:						
2613 2613 106.6.144:11.15; 112.16.270:25 28:24.78:19.131:5; 260:20 South (2) 17:37:31; 18:20:21:13 18:20:21:13 18:20:21:12 18:20:21:13 18:20:21:13 18:20:21:12 18:20:21:13 18:10:22:138:18; 144:6.17.189:10 showing (5) 13:10.22:138:18; 144:6.17.189:10 showing (5) 19:12 sowend (1) shows (4) 50:17 several (15) 13:23.39:11.48:11; 64:15.78:1,83:6.8,16; 18:20.86:21.98:14; 16:41.57.81:83:6.8,16; 18:20.86:21.98:14; 16:41.57.81:83:6.8,16; 18:20.86:21.98:14; 16:41.57.81:83:6.8,16; 18:20.86:21.98:14; 16:41.57.81:83:6.8,16; 18:20.86:21.98:14; 16:41.57.81:83:6.8,16; 18:20.86:21.98:14; 16:25.17:16; 23:22; 24:2.6.72:19.23; 17:14.21:11.18.21:77; 270:3 signatories (1) 258:9 signatories (1) 11:23:18:81.12.23 18:8.82:21:13.23:14.6:23:71.6; 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:144:6:237:16, 18:23:34:34:34:44:6:237:16, 18:23:34:34:34:44:6:237:16, 18:23:34:34:34:44:6:237:16, 18:23:34:34:34:34:44:6:237:16, 18:23:34:34:34:34:44:6:237:16, 18:23:34:34:34:34:44:6:237:16, 18:23:34:34:34:34:44:6:237:16, 18:23:34:34:34:34:46:237:16, 18:23:34:34:34:34:46:237:16, 18:23:34:34:34:34:46:237:16, 18:23:34:34:34:34:46:237:16, 18:23:34:34:34:34:34:34:34:34:34:34:34:34:34						
26.3;184:11			· · · · · · · · · · · · · · · · · · ·			
set (9)	0 , ,					
139-9-9-144-122;	*					
166:12;178:2;190:21; 131:10,22;138:18; 206:10,212:11;258:6 sometimes (15) 344:46:1,4;774.5; 118:8 15:10,122;53:12;258:19 148:16; 78:7;191:12 15:16;248:8 shows (4) 50:17 several (15) 53:19,82:1;150:8; 270:6 siblings (2) 48:23;50:18 siblings (2) 48:23;50:18 siblings (2) 48:23;50:18 siblings (2) 49:11,12,13;14,18; 57:17;171:18:217:7; 270:3 sign (8) 270:18:20:14; 16:25;17:16;23:22; 24:26;72:19;23; 16:22; 24:26;72:19;23; 170:14,21 16:25;17:16;23:22; 24:26;72:19;23; 170:14,21 16:25;17:16;23:22; 24:26;72:19;23; 170:14,21 18:30;103:10,14; 19:2;131:11,23; 133:106:13,15 signature (7) 275:38*23,24; 89:19;13;106:13,15 19:2;131:11,23; 143:0;103:10,14; 19:2;131:11,23; 143:0;103:10,14; 177:17,19;178:5,12 209:4 200:4						
148:25 148:16,17;189:10 148:25 149:16,17;189:10 148:25 191:12 215:16;248:8 18, 206:10;212:11;258:6 18; 208:22;28:17 34:469;1,477:4,5; 209:18;20:22;214:9; 236:23 236:23						
sets (1)						
148:25 setting (I) 69:22;84:7;165:6; 3ix (2) 43:25;228:17 209:18;212:22;214:9; 63:15 50:17 50:17 50:17 50:17 50:17 50:18 270:6 50:18 270:6 50:18 23:39:11;48:11; 64:15;78:1;83:68,16; 84:23;50:18 50:18 50:19;11:4 140:3;228:15;233:16 50:19;11:4 270:3 50:18 50:19;11:4 50:19;11:						
setting (1) 69:22;84:7;165:6; 215:16;248:8 seven (1) six (2) 43:25;228:17 size (1) 115:10;155:25; 209:18;212:22;14:9; 3236:23 somewhere (6) spearheading (1) seven (1) 50:17 several (15) 13:23;39:11;48:11; 64:15;78:1;83:6,8,16, 18;20;86:21;98:14; 14:03;228:15;233:16 sex (2) 10:9;11:4 side (9) 13:23;39:11;40:12;23:16 sex (2) 10:9;11:4 sex (2) 10:9;11:4 signal (2) 10:45;217:16 shake (1) 6:9 shall (9) 16:25;17:16;23:22; 27:218 share (4) 15:15;25;168:8; 217:5;22;113 share (4) 15:15;25;168:8; 217:5;22;113 share (4) 15:12;21;13;10:12; 11:12;21;11:12;3; 14:39;144:6;237:16, 18;23 sharing (1) 10:11;21;21;11:12;3; 14:39;144:6;237:16, 18;23 sharing (1) 10:12;16:3;15 signature (7) 73:23;88:23;24; share (11) 49:12;13;10:13;1						
191:12 215:16;248:8 show (4) 53:19;82:1;150:8; 270:6 skill (1) 53:19;82:1;150:8; 270:6 skill (1) 53:19;82:1;150:8; 270:6 skill (1) 53:6 21:22;55:12;57:10; 25:66:2 skill (1) 53:6 SLAY (21) 53:6 SLAY (21) 50:6(1);150:8; 25:14;232:3;272:14 specialized (2) 257:23:264:25 speci						
Several (15) 50:17 53:19;82:1;150:8; 266:2 skill (1) 23:22;55:12;57:10; 59:18;104:12;236:16 58:23;50:18 48:23;50:18 53:6 58.4X (21) 55:6,11;47:3,19; 49:11,12,13,14,18; 57:17;171:18;217:7; 270:3 57:17;171:18;217:7; 270:3 57:17;171:18;217:7; 270:3 58all (9) 16:25;17:16;23:22; 24:21;25;28:12; 27:18 58:10;103:10,14; 166:20,22;241:10, 151:25;168:8; 217:5;221:13 73:23;88:23,24; 53:17;122:13; 58arang (11) 43:10;103:10,14; 119:2;13:11,123; 48:23; 58arang (1) 73:17;18;89:9; 58arang (1) 10:12;126:3;138:24; 10:12;13;123; 10:12;13;123; 10:12;13;123; 10:12;23; 10:12;13;123; 10:12;23; 10						
50:17 5:21:15:08; 266:2 5:25:12:57:10; 5:27:23:26:42:5 5:25:23:39:11;48:11; 64:15;78:1;83:6,8,16, 18;20;86:21;98:14; 140:3;228:15;233:16 5ex (2) 104:5;217:16 79:13,19;179:8,16; 243:12,15;258:12; 272:18 signatories (1) 16:22;22;242:26,672:19,23; 17:014,21 151:25;168:8; 217:5;221:13 73:23;88:23,24; 8shared (11) 43:10:103:10,14; 119:2;131:11,23; 143:9;144:6;237:16, 18;23 143:9;144:6;237:16, 18;23 143:9;144:6;237:16, 18;23 143:9;144:6;237:16, 18;23 143:9;144:6;237:16, 18;23 153:25 Sharm (1) 49:12;22 Sharm (5) 106:21;216:3;138:24; 150:3;167:8,11,12,14; 17:71,19;178:5,12, 18:3;189:1; 150:3;167:8,11,12,14; 17:71,19;178:5,12, 18:3;180:1, 150:23;183:24; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 150:3;167:8,11,12,14; 17:71.71,19;178:5,12, 17:71.71,19;178:5,12, 17:11,10;113;16; 17:11,11;15:13; 13:11						
Several (15)						
13:23;39:11;48:11; 64:15;78:1;83:68,16, 18; 20;86:21;98:14; 140:3;228:15;233:16 sex (2)						
64:15:78:1;83:6,8,16, 18,20;86:21;98:14; side (9)						
18,20;86:21;98:14; 140;3;228:15;233:16 side (9)						
140:3;228:15;233:16						
sex (2) 57:17;171:18;217:7; 17;88:21;106:12; SOP (3) 111:13;168:2;193:2; 197:14;234:11;240:7 246:19;163:22; 241:19,19;263:10 197:14;234:11;240:7 246:19;264:1 197:14;234:11;240:7 246:19;264:1 197:14;234:11;240:7 246:19;264:1 197:14;234:11;240:7 246:19;264:1 197:14;234:11;240:7 246:19;264:1 specifically (25) 246:19;264:1 specifically (25) 148:26:13;53:7; 246:19;264:1 specifically (25) 448:26:13;53:7; 246:19;264:1 specifically (25) 448:26:13;53:7; 246:19;264:1 specifically (25) 448:26:13;53:7; 246:19;264:1 specifically (25) 448:26:13;53:7; 246:19;216:15; 242:1,6 Sorenson (1) 148:20:13;42:18; 148:26:13;53:7; 64:6;83:16;84:1; 209:14 209:29:39:39:39:39:39:39:39:39:39:39:39:39:39						
10:9;11:4 sexual (2) sign (8) 79:13,19;179:8,16; shake (1) 243:12,15;258:12; 269:12 slightly (1) 213:4 social (4) 15:25;17:16;23:22; 166:20,22;241:10, 170:14,21 166:20,22;241:10, 170:14,21 151:25;168:8; signature (7) 217:5;221:13 73:23;88:23,24; shared (11) 89:1;91:3;106:13,15 shared (11) 43:10;11,123; 13:11,123; 13:39;144:6;237:16, 18;23 73:17,18;89:9; 13:39;144:6;237:16, 63:25 166:20,22;241:10, 18;23 73:17,18;89:9; 13:30;131:11,23; 13:30;						
sexual (2) sign (8) 198.7;200:18;202:14; 204:19;216:15; SOPs (2) 246:19;264:1 specifically (25) shake (1) 79:13,19;179:8,16; 243:12,15;258:12; 269:12 269:12 Sorenson (1) 148:26:13;53:7; 64:6;816;84:1; 143:10 46:6;83:16;84:1; 16:25;17:16;23:22; 258:9 signatories (1) 213:4 sorry (20) 14:8;26:13;53:7; 64:6;83:16;84:1; 10:22;111:10;116:4; 10:22;113:10;14; 10:22;113:10;14; 10:22;113:10;14; 10:22;113:10;14; 10:22;13:10;14; 10:22;113:10;14; 10:21; 10:22;113:10;14; 10:22;113:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:22;13:10;14; 10:21; 10:10;14; 10:10						
104:5;217:16			1 1			
shake (1) 243:12,15;258:12; 272:18 269:12 slightly (1) Sorenson (1) 148:26:13;53:7; 64:6;83:16;84:1; 102:2;111:10;116:4; 102:2;117:16;23:22; 24:2,6;72:19,23; 170:14,21 143:10 148:26:13;53:7; 64:6;83:16;84:1; 102:2;111:10;116:4; 102:2;111:10;116:4; 102:2;111:10;116:4; 102:2;111:10;116:4; 103:23;88:23,24; 104:23 32:23;40:13;42:18; 102:2;110;116:4; 125:17;126:1,19; 125:17;126:1,19; 125:17;122:13;180:1, 126:13;174:1;186:23 148:26:13;53:7; 64:6;83:16;84:1; 102:2;111:10;116:4; 102:2;111:10;116:4; 103:23;101:16; 106:20,22;241:10, 115:17;122:13;180:1, 115:17;122:13;190:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:16; 110:10; 11						
6:9 shall (9) 16:25;17:16;23:22; 24:2,6;72:19,23; 170:14,21 166:20,22;241:10, 166:20,22;241:10, 151:25;168:8; 217:5;221:13 5hare (1) 213:4 5social (4) 151:25;168:8; 217:5;221:13 5hared (11) 43:10;103:10,14; 19:2;131:11,23; 143:10 5social (4) 19:13:197:20;199:4 233:20;236:20; 242:17;57:15 5signatures (1) 20:45:15 13:8;23 136:6,23:140:16,23; 136:6,23:140:16,23; 136:6,23:140:16,23; 136:6,23:140:16,23; 136:6,23:140:16,23; 136:6,23:140:16,23; 136:23; 136:6,23:140:16,23; 136:25 177:17,19;178:5,12, 20:10,11,13,15,16, 69:23;70:8,19;75:20; 5soculating (1) 136:25 177:17,19;178:5,12, 20:10,11,13,15,16, 136:12; 23:11; 136:12; 23:19; 136:6,23:140:16,23; 136:12,23:13; 136:13; 138:24; 136:6,23:140:16,23; 136:6,23:140:						
shall (9) signatories (1) 213.4 sorry (20) 102:2;111:10;116:4; 24:2,6;72:19,23; 16:20,22;241:10, 154:23 74:2;82:12;104:9; 149:19,21;161:16;4 170:14,21 166:20,22;241:10, social (4) 115:17;122:13;180:1, 162:13;174:1;186:23 185:25;168:8; signature (7) socialize (1) 5;183:13;191:16; 162:13;174:1;186:23 191:3;197:20;199:4 233:20;236:20; 242:17;257:15 191:3;197:20;199:4 43:10;103:10,14; 89:1;91:3;106:13,15 signatures (1) 36:3,8;75:3,13; 243:13;251:22 specifics (6) 18,23 143:9;144:6;237:16, signed (17) 17,25;134:1;135:13; 20:24;30:24;30:24;31:3,21; 240:9 sharing (1) 106:12;126:3;138:24; 141:5;197:7,15,21; 61:1;67:1;68:17; 84:17 63:25 150:3;167:8,11,12,14; 226:10,11,13,15,16, 69:23;70:8,19;75:20; speculate (1) 8hawn (5) 169:22;118:23; 20;180:1 20;249:1;261:2,4,66; 117:25;132:1; 136:25 Shawn (5) 169:22;118:23; 169:119;3;255:2 169:23;70:19 154:18;175:21;76:16; 1			slightly (1)			
16:25;17:16;23:22; 24:2,6;72:19,23; 170:14,21 166:20,22;241:10, 11 154:23 154:23 151:17;122:13;180:1, 162:13;174:1;186:23 151:25;168:8; 217:5;221:13 243:10;103:10,14; 119:2;131:11,23; 143:9;144:6;237:16, 18,23 143:9;144:6;237:16, 18,23 15haring (1)	shall (9)	signatories (1)				
24:2,6;72:19,23; 170:14,21			smartphone (1)			
170:14,21						
share (4) 11 268:6,7,9,12 5;183:13;191:16; 191:13;197:20;199:4 151:25;168:8; signature (7) socialize (1) 210:18;213:10,14; 233:20;236:20; 242:17;257:15 shared (11) 89:1;91:3;106:13,15 softball (41) 243:13;251:22 specifics (6) 43:10;103:10,14; signatures (1) 36:3,8;75:3,13; sort (36) 17:25;113:18; 143:9;144:6;237:16, signed (17) 17,25;134:1;135:13; 20:24;30:24;31:3,21; 240:9 sharing (1) 106:12;126:3;138:24; 141:5;197:7,15,21; 61:1;67:1;68:17; 69:23;70:8,19;75:20; speculate (1) Sharpsburg (1) 177:17,19;178:5,12, 20;180:1 20;249:1;261:2,4,6,6; 93:20;98:14;107:14; 136:25 Shawn (5) significant (1) 20;249:1;261:2,4,6,6; 17:25;123:21; 136:25 69:22;118:23; 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) 185:8;192:13;236:13 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)			social (4)		162:13;174:1;186:23;	
151:25;168:8; 217:5;221:13 73:23;88:23,24; 89:1;91:3;106:13,15 signatures (1) 243:10;103:10,14; 19:2;131:11,23; 143:9;144:6;237:16, 18,23 sharing (1) 63:25 Sharpsburg (1) 106:12;126:3;138:24; 150:3;167:8,11,12,14; 226:10,11,13,15,16, 19:22 20;180:1 Shawn (5) 69:22;118:23; 185:8;192:13;236:13 Shawn's (1) 167:9;179:3;255:2 Socialize (1) 209:4 218:9;225:3,24; 242:17;257:15 specifics (6) 17:25;113:18; 243:13;251:22 specifics (6) 17:25;113:18; 148:17;186:14;228:3 10:6,10;12:16; 20:24;30:24;31:3,21; 240:9 speculate (1) 10:12;126:3;138:24; 141:5;197:7,15,21; 69:23;70:8,19;75:20; speculating (1) 136:25 speculating (1) 136:25 speculating (3) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2) spe					191:13;197:20;199:4;	
217:5;221:13		signature (7)				
shared (11) 89:1;91:3;106:13,15 softball (41) 243:13;251:22 specifics (6) 43:10;103:10,14; signatures (1) 36:3,8;75:3,13; 10:6,10;12:16; 17:25;113:18; 119:2;131:11,23; 245:15 113:8;123:13;132:15, 10:6,10;12:16; 148:17;186:14;228:3 143:9;144:6;237:16, signed (17) 17,25;134:1;135:13; 20:24;30:24;31:3,21; 240:9 sharing (1) 106:12;126:3;138:24; 141:5;197:7,15,21; 61:1;67:1;68:17; speculate (1) Sharpsburg (1) 177:17,19;178:5,12, 226:10,11,13,15,16, 69:23;70:8,19;75:20; speculating (1) 49:22 20;180:1 20;180:1 20;249:1;261:2,4,66; 113:11;115:13; speculation (3) Shawn (5) significant (1) 20;249:1;261:2,4,66; 117:25;123:21; 28:11,16;160:4 69:22;118:23; 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) 185:8;192:13;236:13 signing (3) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)		73:23;88:23,24;				
43:10;103:10,14; signatures (1)	shared (11)	89:1;91:3;106:13,15	softball (41)	243:13;251:22		
119:2;131:11,23;				· · · · · · · · · · · · · · · · · · ·		
143:9;144:6;237:16, signed (17) 17,25;134:1;135:13; 20:24;30:24;31:3,21; 240:9 sharing (1) 106:12;126:3;138:24; 136:6,23;140:16,23; 35:2,10;53:19;54:2; speculate (1) 63:25 150:3;167:8,11,12,14; 226:10,11,13,15,16, 69:23;70:8,19;75:20; speculating (1) Sharpsburg (1) 177:17,19;178:5,12, 20;180:1 230:9,15,16;248:19, 93:20;98:14;107:14; 136:25 Shawn (5) significant (1) 20;249:1;261:2,4,6,6; 117:25;123:21; 28:11,16;160:4 69:22;118:23; 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) 185:8;192:13;236:13 signing (3) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)		. , ,			148:17;186:14;228:3;	
18,23 73:17,18;89:9; 136:6,23;140:16,23; 35:2,10;53:19;54:2; speculate (1) sharing (1) 106:12;126:3;138:24; 141:5;197:7,15,21; 61:1;67:1;68:17; 84:17 63:25 150:3;167:8,11,12,14; 226:10,11,13,15,16, 69:23;70:8,19;75:20; speculating (1) Sharpsburg (1) 177:17,19;178:5,12, 17,18,18,20;227:16; 93:20;98:14;107:14; 136:25 49:22 20;180:1 230:9,15,16;248:19, 113:11;115:13; speculation (3) Shawn (5) significant (1) 20;249:1;261:2,4,6,6; 117:25;123:21; 28:11,16;160:4 69:22;118:23; 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) 185:8;192:13;236:13 signing (3) 180:13;191:21; 161:24 Shawn's (1) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)						
sharing (1) 106:12;126:3;138:24; 141:5;197:7,15,21; 61:1;67:1;68:17; 84:17 63:25 150:3;167:8,11,12,14; 226:10,11,13,15,16, 69:23;70:8,19;75:20; speculating (1) Sharpsburg (1) 177:17,19;178:5,12, 17,18,18,20;227:16; 93:20;98:14;107:14; 136:25 49:22 20;180:1 230:9,15,16;248:19, 113:11;115:13; speculation (3) Shawn (5) significant (1) 20;249:1;261:2,4,6,6; 117:25;123:21; 28:11,16;160:4 69:22;118:23; 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) 185:8;192:13;236:13 signing (3) 180:13;191:21; 161:24 Shawn's (1) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)						
63:25 150:3;167:8,11,12,14; 226:10,11,13,15,16, 69:23;70:8,19;75:20; speculating (1) 136:25 49:22 20;180:1 230:9,15,16;248:19, 113:11;115:13; speculation (3) 5hawn (5) 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)	sharing (1)				84:17	
Sharpsburg (1) 177:17,19;178:5,12, 17,18,18,20;227:16; 93:20;98:14;107:14; 136:25 49:22 20;180:1 20;249:1;261:2,46,6; 113:11;115:13; speculation (3) Shawn (5) 91:21 20;249:1;261:2,46,6; 154:18;175:2;176:16; Spell (1) 85:8;192:13;236:13 signing (3) 180:13;191:21; 161:24 Shawn's (1) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)					speculating (1)	
49:22	Sharpsburg (1)					
Shawn (5) significant (1) 20;249:1;261:2,4,6,6; 117:25;123:21; 28:11,16;160:4 69:22;118:23; 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) 185:8;192:13;236:13 signing (3) 180:13;191:21; 161:24 Shawn's (1) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)						
69:22;118:23; 91:21 262:2;270:19 154:18;175:2;176:16; Spell (1) sole (3) 180:13;191:21; 161:24 spend (2)	Shawn (5)					
185:8;192:13;236:13 signing (3) sole (3) 180:13;191:21; 161:24 Shawn's (1) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)		. ,				
Shawn's (1) 167:9;179:3;255:2 33:17;140:21; 197:11;201:19,20; spend (2)		signing (3)				

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 302 of 362
Bostock v. Video Deposition Septem **Colin Slay September 10, 2021**

Clayton County				September 10, 2021
anandina (12)	241:1;265:7,11	258:15	89:24	12.167.10.170.14.24.
spending (12)				12;167:10;170:14,24;
35:21;111:16;	stamped (8)	stewardship (2)	stuff (14)	175:22;178:3;179:4,
119:24;120:6;131:12,	72:1;86:12,22;88:6;	265:17;267:2	52:23;67:15;104:2;	4,5,6,13,14;180:2;
24;138:9;162:20;	90:10;106:11;198:5;	still (28)	105:7;139:1;147:17;	182:8;222:12,16;
164:5;245:11;254:17;	216:14	37:1,1;41:12,13;	162:22;198:23,24;	223:3;239:18,24;
255:20	Stan (3)	42:7;44:23;46:2,7;	200:5;224:13;236:1;	240:2;265:18
spent (29)	184:4,6;190:14	58:8;88:2;97:21;	256:22;258:7	supervise (1)
20:5;21:16;28:8;	stand (3)	142:15;143:5,17;	subject (5)	228:11
119:1,4,19,19;123:3;	14:13;101:20,24	148:2;154:1;178:18;	93:14;134:12;	supervising (2)
129:12;132:14;	standard (2)	181:4,12,18;182:15,	139:6;140:8;216:16	67:17;235:17
	, ,			
136:17,20;141:14,16,	138:25;258:18	21;201:3,8;206:11;	submit (6)	supervision (1)
24;173:24;226:2,9;	standards (5)	220:2;224:11;263:22	100:18,22;111:4;	134:12
227:22;246:20;247:6,	87:18;88:3;91:15;	Stinson (4)	166:25;212:2;225:9	supervisor (23)
8;249:1;260:2,19;	134:6;239:1	184:16;190:18;	submitted (8)	13:6;55:9,14,16,17,
265:4,4,16;267:20	start (5)	191:15,18	78:12;84:9;100:14;	23,24;79:10;86:15;
split (2)	92:9,13;117:13;	Stockbridge (2)	102:3;103:6;145:12;	98:22;115:8;116:1;
188:9,11	158:16;225:14	49:25;50:3	148:6;169:20	180:24;181:9;182:7,
spoke (2)	started (10)	stole (1)	submitting (1)	18;183:17;184:9;
12:22;184:5	7:18;10:8;38:14;	267:19	93:3	216:9;220:21,24;
spoken (6)	39:25;54:25;184:11;	stood (3)	subordinates (3)	228:5,14
10:3,6;12:10,22;	214:1;224:13;225:16,	99:25;158:15;192:7	67:3;68:13,18	supervisors (3)
228:22;261:8	20	stop (3)	subsequent (5)	164:23;235:21,22
sponsor (9)	starting (2)	235:25;236:2,3	10:23;156:19;	supervisor's (1)
36:3;113:8;126:13;	56:14;225:11	storage (2)	161:15,17;177:25	88:23
132:15;135:13;141:4;	starts (2)	203:8;205:9	subsequently (3)	supervisory (1)
226:10;256:12,13	141:4;238:13	stored (1)	155:9;167:25;	81:11
sponsored (3)	State (9)	205:8	193:25	supervisory/ (1)
141:2;261:4;263:14	51:14;72:3;88:6;	stores (1)	subsidiary (1)	87:15
sponsoring (6)	126:1;143:11;175:22;	249:16	176:17	supervisory/management (6)
			substance (1)	
36:9,11,12;74:15;	265:12,20;267:17	story (1)		87:8,17;88:2,7;
133:25;230:9	stated (7)	217:7	237:14	91:13,18
sponsorship (15)	16:4;75:10;143:8;	Stoutamire (4)	substantial (1)	supplies (2)
123:13;133:4,5,6,	147:21;163:12;	181:17,18,21;186:6	177:23	158:25;160:5
25;197:7,8,15;	206:23;261:7	stray (1)	success (2)	support (11)
226:16;227:16;	statement (13)	50:14	265:17;266:3	22:22;27:24;31:4;
261:17,19;263:15;	26:17;72:19;75:9;	stream (1)	successful (2)	119:3;140:21;170:25;
270:20,22	107:3;121:10;130:20;	69:14	76:18;266:22	171:2;201:13;208:10;
sponsorships (6)	170:15;238:18,25;	Street (2)	succession (2)	254:9;261:9
248:10,13,17;	239:1;246:25;252:23;	17:3;73:1	108:22;148:11	supported (1)
263:3,11;270:6	256:9	stretch (1)	successor (1)	31:6
sports (3)	statementincluded (1)	71:11	153:22	supporter (1)
263:3,9,14	250:4	strict (3)	suddenly (2)	202:4
spouse (2)	statements (14)	249:19,25;263:12	189:2;214:23	supporting (2)
7:3;8:16	92:14;94:22;98:11,	strictly (1)	suggest (1)	33:6;35:4
Spread (1)	13;102:16;117:14;	135:18	117:18	suppose (2)
264:18	120:15;124:3;129:11;	strident (1)	suggesting (7)	126:22;220:11
Stacey (9)	130:25;195:7;202:20;	202:4	53:12;190:10,13;	supposed (13)
13:4,5;15:12;63:21,	203:1.5	strike (2)	245:4,8;247:6;254:25	32:22;78:24;117:2;
24;121:14;122:4;	,	17:14;164:18	suggestion (1)	
	states (2)			118:10;148:23;149:5;
237:11,12	238:17;255:9	strong (1)	68:14	183:1;243:3,12,15;
staff (51)	status (1)	139:4	suggestions (1)	247:24;253:21;259:5
12:12;13:10;40:21;	222:11	strongly (1)	67:1	supposition (1)
41:4;56:18,25;57:3,	step (1)	66:22	suit (3)	159:19
24,25;58:9,10,13,16;	83:10	struck (1)	46:1,4;217:2	Supreme (2)
59:14,16;60:15;	stepped (3)	241:11	sum (1)	215:25;217:1
85:20,23;91:21;	178:14;225:15,20	structure (2)	254:13	sure (63)
156:21;161:11,13,13,	steps (1)	158:14;267:11	summer (2)	6:7;12:3;15:3;
	2 , ,		59:1;105:10	
18,19;162:15;164:10,	71:6	structured (1)		20:17;21:1;29:1;30:5;
10,16,19;165:8,12;	Steve (1)	265:10	Superior (35)	31:8;37:8;42:9;44:6,
172:20,20,23;173:7,8,	238:15	struggled (3)	15:19;24:1;28:19;	7;45:1;46:24;60:8;
24;174:4,5,8;195:5;	Steven (3)	119:12;128:16;	39:8;72:3,18;73:20;	65:6;68:5,9,10,10,14;
197:9;203:6;216:22;	150:4;178:5;217:12	129:8	114:21;115:9,15,19;	71:12;75:16;76:22;
228:7;234:18;235:20;	steward (1)	stuck (1)	117:10;141:8;143:11,	77:12;83:19;99:25;
228:7;234:18;235:20;	steward (1)	stuck (1)	117:10;141:8;143:11,	77:12;83:19;99:25;

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 303 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

				September 10, 2021
100 14 105 4 100 5	76 15 77 21 70 0 10	221.0	107 00 01 100 14	117 6
108:14;125:4;130:7;	76:15;77:21;79:8,10;	231:9	127:20,21;129:14;	117:6
154:24;156:2,18;	80:12,19,20;124:4;	tells (2)	143:10,14,20,24;	thorough (1)
162:24;163:18;165:4;	134:20;157:1;161:12,	217:15;219:16	144:6,16,18;145:4,20,	127:23
168:20;169:11;	14,20;165:23;184:17,	temporary (1)	23;146:4;147:20;	though (12)
178:17;184:25;	21;185:25;186:3,5,8,	251:21	148:4,15;150:4;	41:12;55:20;63:8;
189:17,24;190:8;	10,18;190:14,18;	ten (1)	151:3,8,24;152:4,21;	88:1:95:1;100:3;
191:9,25;196:13;	192:14,15;231:17,23;	67:20	157:13;161:3;166:16,	120:18;135:20;175:7;
215:23;218:18;242:2;	247:1	tension (5)	19;176:25;177:4,10;	191:9;227:20;264:4
243:21;244:3;245:21;	talked (22)	67:5;69:18;119:23;	178:5,18;179:9;	thought (12)
248:21;249:5;255:3;	8:15,17;9:11;14:3,	120:2,12	180:22;185:15;	8:4;37:21;117:19;
256:15;262:7,18;	7;15:9,10;62:2;77:24;	term (6)	193:11;207:10,17;	192:18;218:9;219:13,
266:18,20;267:3;	84:11;112:7;127:20;	123:15;204:25;	208:14,16;209:2,5,11;	25;221:8;239:10,19,
268:24;272:20	185:12,15,18;191:12;	222:17;226:23;227:2;	210:3,18;211:8;	25;251:8
surface (1)	192:24,25;236:12;	244:13	212:20;213:1;214:23;	thousand (3)
131:1	237:11,21;255:6	terminate (7)	217:12,14;218:1,2;	271:3,6,7
surprise (1)	talking (29)	63:15;82:19;	221:4;223:15;224:8;	three (20)
189:7	12:8;23:12;28:23;	146:18;147:2,22;	225:24;226:14;227:7,	10:16,19;30:22;
surprising (3)	37:16,21;45:3;80:10,	152:24;237:7	12;229:11,14;230:6,	42:24;49:13;55:8;
130:10,13;189:3	17,25;82:4,18;84:6;	terminated (37)	12;231:5,9,17,20;	66:12;74:23;75:10;
surrender (5)	107:6;116:2;131:15,	9:14;12:13;13:14,	233:7,10,21;237:5;	85:25;168:8;179:5;
145:14;147:14,17;	16;139:11;152:15;	16,21;14:9,13;43:21;	238:15;240:1,21;	195:12;201:11;220:4,
150:11,14	160:21;184:22;	57:24;58:8;61:10,17,	241:1,10,10	8,12;248:8;263:24;
surrounding (5)	185:18,22;222:24;	20,25;62:5;69:8;	Teske's (1)	270:1
7:17;10:2;12:10;	226:15;227:15;	80:13;85:14;105:6;	193:22	throughout (1)
68:1;267:12	256:14;257:21,23;	106:18,20;108:21;	testified (7)	59:16
suspended (1)	258:19	137:8;154:9;168:16;	5:8;111:20;112:11;	throw (1)
146:21	talks (2)	184:13;189:3,12,12;	113:15;158:5;227:4;	40:22
suspension (1)	200:4;243:10	200:23;202:13;	229:10	thrown (1)
71:4	tax (2)	204:22;205:1;214:22;	testify (1)	174:19
suspicion (4)	25:21;185:4	227:6;229:12;230:8	243:22	tied (3)
103:12;118:4;	team (41)	terminating (1)	testifying (1)	127:5;140:22;222:9
131:4;163:24	36:4;75:3,6,6;	62:17	50:13	tighten (1)
sustain (1)	113:8;123:13;124:6;	termination (37)	testimony (23)	260:12
208:10	126:14;132:15,17,17,	7:23;8:9,9;9:3,18;	6:14,23;7:5,16;	tightened (1)
sustaining (1)				
	19.20.22:133:7:	12:11:13:9:15:11.13.	8:12:9:9:14:7:111:21:	260:3
	19,20,22;133:7; 136:10 14 18:140:16	12:11;13:9;15:11,13, 15:18:14:44:15:	8:12;9:9;14:7;111:21; 112:13 13 15:142:19:	260:3 timed (1)
164:20	136:10,14,18;140:16,	15;18:14;44:15;	112:13,13,15;142:19;	timed (1)
164:20 sustenance (1)	136:10,14,18;140:16, 23;141:5;197:8,16;	15;18:14;44:15; 46:10;61:4;62:8,24;	112:13,13,15;142:19; 151:4;220:15;221:6,	timed (1) 98:2
164:20 sustenance (1) 124:11	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13,	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11;	timed (1) 98:2 times (18)
164:20 sustenance (1) 124:11 swear (1)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16;	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25;	timed (1) 98:2 times (18) 10:3;18:9,17;25:8;
164:20 sustenance (1) 124:11 swear (1) 5:4	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15;	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10,	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13;	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23;	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1;	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20)	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4)
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20)	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4)
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8,	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19)
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4,
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1)	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2,	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111)	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10 table (2)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1) 21:13	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18; 9:13;10:19,24;12:11;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2) 84:1;140:12	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25 together (10)
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10 table (2) 61:22;111:16	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1) 21:13 telephone (1)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18; 9:13;10:19,24;12:11; 20:15;26:6;44:14;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2) 84:1;140:12 thief (2)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25 together (10) 66:13;132:24;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10 table (2) 61:22;111:16 take-home (1)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1) 21:13 telephone (1) 44:13	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18; 9:13;10:19,24;12:11; 20:15;26:6;44:14; 60:23,25;61:3,6,9,15,	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2) 84:1;140:12 thief (2) 163:25;164:1	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25 together (10) 66:13;132:24; 143:19;209:7,23;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10 table (2) 61:22;111:16 take-home (1) 199:5	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1) 21:13 telephone (1) 44:13 telephones (1)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18; 9:13;10:19,24;12:11; 20:15;26:6;44:14; 60:23,25;61:3,6,9,15, 19;63:1;105:17;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2) 84:1;140:12 thief (2) 163:25;164:1 thinking (1)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25 together (10) 66:13;132:24; 143:19;209:7,23; 210:1,4,19;228:24;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10 table (2) 61:22;111:16 take-home (1) 199:5 talk (35)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1) 21:13 telephone (1) 44:13 telephones (1) 206:12	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18; 9:13;10:19,24;12:11; 20:15;26:6;44:14; 60:23,25;61:3,6,9,15, 19;63:1;105:17; 106:23;108:3,4,19,20;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2) 84:1;140:12 thief (2) 163:25;164:1 thinking (1) 145:7	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25 together (10) 66:13;132:24; 143:19;209:7,23; 210:1,4,19;228:24; 264:14
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10 table (2) 61:22;111:16 take-home (1) 199:5 talk (35) 13:13,14;14:8;	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1) 21:13 telephone (1) 44:13 telephones (1) 206:12 telling (3)	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18; 9:13;10:19,24;12:11; 20:15;26:6;44:14; 60:23,25;61:3,6,9,15, 19;63:1;105:17; 106:23;108:3,4,19,20; 109:5,10,19;110:15;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2) 84:1;140:12 thief (2) 163:25;164:1 thinking (1) 145:7 third (3)	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25 together (10) 66:13;132:24; 143:19;209:7,23; 210:1,4,19;228:24;
164:20 sustenance (1) 124:11 swear (1) 5:4 swim (2) 258:2,15 switched (2) 45:19;206:11 swooning (1) 124:20 sworn (2) 5:7;175:5 system (2) 94:2;178:16 T tab (4) 21:25;212:9;233:2, 10 table (2) 61:22;111:16 take-home (1) 199:5 talk (35)	136:10,14,18;140:16, 23;141:5;197:8,16; 209:12;226:10,11,13, 15,16,17,18;227:16; 230:9,15;258:2,15; 261:4,6,25;262:23; 271:13 teams (4) 74:15;133:2;134:1; 263:14 team's (1) 258:5 technical (2) 209:12;210:21 technically (2) 11:15;51:5 techniques (1) 139:1 technology (2) 42:2,3 teetotaler (1) 21:13 telephone (1) 44:13 telephones (1) 206:12	15;18:14;44:15; 46:10;61:4;62:8,24; 71:5;84:22;106:22; 109:2,13,21;110:9; 146:16;150:5;151:10, 21;153:9;181:24; 185:25;186:25; 190:16,19;200:9; 217:4;225:25;267:25 terms (20) 15:21;17:18;19:25; 34:9;68:2;69:21; 74:11,14;76:23;77:8, 18;78:11;94:1;95:14; 114:7;124:5,5; 134:11;167:14; 173:17 terrific (1) 258:14 Teske (111) 7:6,15,21;8:5,18; 9:13;10:19,24;12:11; 20:15;26:6;44:14; 60:23,25;61:3,6,9,15, 19;63:1;105:17; 106:23;108:3,4,19,20;	112:13,13,15;142:19; 151:4;220:15;221:6, 10;229:10;230:11; 240:17;241:25; 253:19;269:13; 272:21 texts (1) 41:18 Thanks (1) 213:19 Thanksgiving (1) 201:22 theft (1) 163:19 thereafter (2) 147:7,8 therefore (2) 124:14;223:17 therein (1) 133:9 thereof (2) 84:1;140:12 thief (2) 163:25;164:1 thinking (1) 145:7	timed (1) 98:2 times (18) 10:3;18:9,17;25:8; 64:16;66:8;68:23; 92:22;93:5;99:19; 100:18;103:24; 162:16;163:4,6; 209:7;211:7;236:8 title (4) 55:15;57:4,14; 115:7 titled (1) 59:13 Today (19) 5:2,15;6:1;7:18;8:4, 12;9:25;14:20;22:14; 38:11;56:19;65:24; 231:19,24;232:23; 261:14;269:2,14; 270:25 together (10) 66:13;132:24; 143:19;209:7,23; 210:1,4,19;228:24; 264:14

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 304 of 362 Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County				September 10, 2021
told (42)	13,23;270:3	89:18;183:9;235:24	6:15	261:5
78:13,15;107:25;	transactions (2)	two (46)	unreasonable (1)	usually (2)
	138:11;247:1	6:24;8:15,16;10:19;	128:24	212:10;229:13
108:5;109:8,16; 110:13,13,15;122:4;			unrelated (1)	212.10,229.13
	transcript (2) 6:14;272:19	18:17;20:10;31:18;	85:3	\mathbf{v}
126:16,21,24,25;	transparency (1)	39:21;42:22,24;		V
143:14;146:17;151:9, 20;155:12;159:24;	14:16	44:25;49:4,13;50:22; 64:10;65:25;66:12;	unrepresented (1) 28:9	(1)
		74:23;75:10;85:16,	unusual (1)	vacation (1) 268:19
166:16;186:24;187:2,	transparent (2) 100:10,14	21;89:15;97:3;127:5;	189:3	
3,14,15,17;189:10; 192:9;197:20;217:25;	transpired (1)	147:9,10;148:25;	up (51)	vague (2) 15:21;187:21
218:2;219:17;230:7;	10:4	157:10;162:3,5;	8:8;10:22;12:8;	Van (1)
232:2;233:10;240:18,	travel (3)	168:15;172:4;179:5;	20:21;23:22;35:16;	73:24
21;241:17;263:20;	54:5;209:11,19	188:9;201:11;208:20;	37:11,16;44:15;	various (3)
270:23;271:4	traveled (4)	220:4,8,12;232:25;	47:15;51:6;52:12;	94:12;247:11,13
tolerate (1)	209:7;210:1,18,19	245:15,17,21;258:9;	53:23;55:4,17;69:13;	vast (1)
230:10	traveling (1)	261:8;268:10	70:12;78:16;79:11,	44:18
took (12)	210:7	two-year (1)	21;84:7,8;93:2,4;	vehicle (4)
59:1;124:9;139:16,	treasurer (6)	97:2	94:12;97:18;98:5;	199:2,3,5,11
20;143:4;164:6,7,16,	126:4;140:15;	type (4)	104:22;116:5;124:7;	venture (1)
19;173:23;194:12;	145:16;243:15;	93:22;175:2;	139:9,9;141:22;	114:20
234:9	244:21;258:2	230:10;263:5	156:10;160:11;	verbal (4)
top (3)	tries (1)	typically (3)	166:12;190:21;	6:7;71:3;194:4,5
216:23;219:20;	53:13	24:14;174:24;	191:12;194:3,6;	verify (2)
270:2	triggered (1)	201:22	216:6;225:24;227:3;	159:17,21
total (4)	148:13	typing (1)	233:2;253:17;258:9;	version (7)
87:12;91:6;247:1,4	trip (1)	214:1	259:14,15,16;260:3,	144:21;213:5;
touch (1)	210:10	typo (1)	12	218:4,11;219:5,19;
122:14	trips (3)	247:19	update (8)	221:5
tournament (9)	210:3;211:5,8	247.17	179:18;202:19;	versus (1)
133:3;135:14;	true (10)	U	205:22;206:8,24;	18:2
136:7,19,23;261:24;	35:12;121:10;	C	208:1,5;213:17	victim (1)
262:1,23,23	141:24,25;159:18;	ultimately (1)	updates (1)	11:17
toward (1)	167:14;210:22;	170:2	42:1	VIDEO (11)
69:23	220:15;248:4;261:11	unbecoming (2)	upgrade (1)	5:1;71:17,19;142:2,
tower (1)	truly (1)	137:9;153:1	42:23	9,11;214:15,17;269:5,
158:15	28:24	uncle (4)	upgrades (1)	7;272:17
toy (1)	trust (2)	49:12,21;50:2,5	42:2	VIDEOGRAPHER (10)
201:20	163:21;193:13	uncles (3)	upon (2)	5:2;71:8,20;142:8,
Tracy (3)	truth (1)	48:11;49:10,14	108:15;241:11	12;214:14,18;269:4,
106:24;108:4;	5:22	uncover (1)	UPS's (1)	8;272:15
151:24	truthful (1)	153:11	52:3	view (1)
trafficked (2)	15:4	under (14)	use (33)	30:6
10:10;11:5	try (6)	5:18;6:19;27:18;	11:22;12:16;17:19,	viewed (1)
train (2)	6:3;9:25;48:1;55:1;	33:8;127:15;142:15;	21;21:9,12;35:14;	175:13
174:6,7	67:14;96:1	165:24;176:14;	41:1,11;45:18;71:11;	violation (2)
trained (10)	trying (11)	234:19;240:9;242:2;	73:7,12;74:10;77:19;	244:9,24
75:25;174:17;	10:21;11:18;124:8;	265:16;267:2;269:16	114:3;121:21;125:19,	vividly (1)
183:5;257:1,3,6,16;	137:5;187:6;221:5,5,	understands (1)	21;127:13;135:3,22;	45:17
258:20;264:24;266:8	10,11;227:5;263:22	28:12	138:13;141:6;149:16;	voluntarily (3)
trainer (2)	T-shirt (1)	understood (2)	172:16;174:4,7;	181:15,16,21
181:8,9	75:5	58:21;262:4	175:13;199:4,13;	volunteer (44)
training (43)	turn (2)	uniforms (1)	234:11;248:22	17:21;20:24;23:9;
12:16;17:22;18:1;	155:12;187:3	133:2	used (21)	35:1;36:16,22;37:15;
35:1;73:8;74:12;76:4,	turned (9)	unit (12)	19:22;26:20;30:14;	73:8;74:12;75:18,22;
15;119:4;127:13;	42:3;44:9,10;45:25;	13:7;67:5;70:6;	71:1;74:11;75:4;	76:4,10,18;115:8,10;
135:22;149:7,17;	46:2;116:22;154:6;	94:13;105:11;116:19;	77:15,17;94:2;	119:3;124:8,19;
164:17,20;165:2,14,	205:2;224:8	121:9;176:20;188:4,	111:14;158:17,25;	132:23;133:20;
17;171:1;173:2,8,15;	Turner (13)	4;199:13;205:9	172:1;174:11;222:17;	135:22;149:7,16;
174:10,23,24;180:24;	122:15,19;127:22,	units (3)	226:12,23;238:22;	162:23;164:25;
181:1;240:10;246:11,	24;201:10,10,19,25;	55:10;133:19;188:9	250:25;252:10,16	170:25;171:2;174:23;
21;247:13,17,22,24;	236:22,25;237:1,6;	University (1)	using (6)	180:24;181:8;182:7,
248:1,3;250:10;	238:16	51:14	124:6;135:12;	18;183:17;184:9;
251:1;252:17;257:4,	twice (3)	unless (1)	141:4;159:25;165:23;	228:5,14;234:6;
	1	1	L	

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 305 of 362
Bostock v. Video Deposition Septem Colin Slay September 10, 2021

Clayton County				September 10, 2021
240 40 245 40 24			107.00 111.1	50 40 40 7 22
240:10;246:10,21;	weekend (1)	willingness (1)	105:20;111:1;	60:10;105:23;
250:9;264:6,13	147:10	91:24	256:16	211:16;214:25;
volunteers (55)	weekly (3)	Wilson (4)	workings (1)	215:10;234:4;238:1;
29:19,20;36:4,13,	196:16;212:22;	81:7,8,19;82:8	28:13	268:8
15;37:2,10,12;38:1;	246:6	wine (1)	workplace (1)	yesterday (3)
67:17,23;74:20,22;		21:6	199:7	38:22;39:5,6
	weeks (1)			
75:7,10,19,20,25;	201:12	wining (2)	works (1)	York (1)
76:9;77:1;111:2;	weighed (1)	163:4,6	7:3	52:14
124:21;133:18;	95:22	wish (1)	write (13)	young (8)
135:24;136:1,1,17;	Welfare (23)	45:15	24:19;25:20;28:5;	10:9,10,25;11:4,9,
148:21,21,22,24;	60:1,21;64:8;	within (14)	79:10,21;93:2,4;	17,21,24
149:1;162:21;164:21,	114:18;116:19;121:9;	35:17;36:5,13;	98:14,21;106:21;	youth (2)
24;165:8;171:2;	156:20;161:11,13,13,	45:20;67:5;88:8;	249:5;258:4;259:1	53:21;64:14
172:7;173:2,16;	18,19;172:18;176:22;	133:19;176:20;177:3;	writes (2)	_
174:19;175:5;181:1,	183:24;195:21;	228:23;234:23;263:4,	24:12;207:21	${f Z}$
10,11;182:13;183:4;	221:23;244:7;245:10;	17;265:12	write-up (1)	
198:18;228:12;	246:13;254:6;256:10;	without (7)	79:6	Zion (1)
256:17;263:16;264:4,	261:3	11:19;96:7;119:13;	writing (10)	21:3
18;265:7;266:25	weren't (14)	128:17;131:13,25;	25:21;120:22;	21.3
18,203.7,200.23				1
***	16:5,9;63:14;76:9,	246:16	242:24;243:7;244:1,	1
\mathbf{W}	23;137:11,12;140:19;	witness (10)	4;255:2,11;258:25;	
	162:5;203:22;221:20;	5:5;59:6;180:7;	259:12	1 (2)
wait (11)	239:11;242:23;	191:25;218:9;255:24;	writings (1)	90:21;127:21
23:1;34:5;91:20;	251:25	269:3;272:10,11,22	154:15	1- (1)
132:4;165:25;167:3;	whatnot (5)	witnesses (7)	written (12)	272:5
	45:7;76:8;99:5;			
180:4,6;218:7;251:5;		217:23;218:13,16;	25:6;39:9;70:12;	1,026.22 (1)
258:8	156:3;252:17	219:20,23;221:6,10	71:4;78:15;84:5;	271:10
waive (1)	what's (21)	woman (2)	144:3;166:6;240:7;	1,200 (2)
28:23	18:1;41:6;47:18;	11:17;264:6	256:10;260:12;	264:16,17
walk (6)	48:21;71:24;74:13,	women (7)	263:10	1/12/10 (2)
24:9;48:14;55:1;	14;83:13;86:8;93:7;	10:9,11;11:1,4,9,21,	wrong (7)	86:15;87:20
96:23;120:13;129:10	106:6;144:15;149:22;	25	53:19;135:10;	1/13/09 (2)
Walker (5)	175:17;197:24;	wondering (1)	163:2,3;213:25;	86:15;87:20
181:6,14;183:8;	199:14;202:6;205:15;	160:3	246:18;259:2	10 (5)
186:3,16	215:16;216:10;	word (8)	wrongdoing (10)	144:15;145:8;
wallet (1)	235:25	19:22;139:4;	102:4;190:11;	238:7,11;269:21
163:21	whatsoever (2)	146:22;163:16,16;	191:14;192:2,11;	10:07 (1)
wants (2)	172:25;203:17	166:24;177:22;	193:3;242:14;245:7;	5:3
	,	267:18		
138:10;172:21	whenever (1)		259:25;267:7	10th (1)
warning (2)	104:18	wording (2)	wrote (9)	5:2
71:4,4	whiz (2)	137:3;217:18	24:24;39:14;69:7;	11 (2)
way (46)	101:16;167:23	words (10)	82:7;114:11;120:20;	52:20;56:13
8:13;11:18;15:22;	who'd (1)	9:24;45:25;79:18;	185:9;198:9;254:7	12 (3)
16:3;44:25;54:8;61:9,	95:19	88:13;92:1;128:19,		42:16,17;114:15
22;63:10,18;66:19;	whole (8)	20;162:18;177:9;	Y	121 (2)
			1	
77:10,14;82:9;83:2,4;	67:17;76:14;88:9;	191:24	. 11 (5)	17:3;73:1
87:19;88:21;89:20;	94:11;100:7;171:19;	work (21)	y'all (5)	12th (1)
90:10;95:6;96:13;	196:2;266:21	7:22;28:10;51:20;	126:11,12;168:8;	194:19
102:6;104:2;129:6;	who's (7)	53:8,24;54:15,19,20;	197:20;210:1	13 (1)
158:3;159:10,17;	59:11;68:5,6;165:1;	88:11;91:25;94:8;	year (16)	206:15
162:20;164:3,6;	173:7;203:13;255:20	105:7,8;106:3;113:3;	51:17;54:17;90:16;	13336 (1)
166:12;167:8;170:2;	whose (2)	129:18;139:16;	91:22;93:16,17;	216:15
176:25;177:9,23;	27:24;108:17	140:24;146:23;149:1;	96:12;104:19,21,22;	14 (1)
193:22;196:6;204:12;	widely (2)	264:20	208:20;223:9;264:11,	204:24
209:13;228:18;	217:8;240:25	worked (12)	15;270:13,16	17 (4)
240:15;247:18;248:6;	wife (3)	25:25;105:11;	years (19)	47:25;48:1;86:24;
265:16	8:11;49:4;105:8	115:16;116:17;125:3;	10:16;42:24;45:8,	149:23
ways (1)	wife's (2)	154:8;185:3,6;	11;47:15;55:8;56:11;	1782 (1)
70:21	47:18;105:12	190:20;228:24;	64:18;97:3;112:19;	90:11
Wednesday (1)	William (1)	251:14;266:3	178:17;183:4;184:2;	1788 (1)
38:22	49:8	workers (1)	232:18;236:15;258:1,	90:11
week (2)	willing (1)	183:6	1;268:11,20	1790 (1)
145:17;235:24	29:16	working (3)	Yep (8)	86:13

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 306 of 362 Bostock v. Video Deposition Colin Slay September 10, 2021

Clayton County				September 10, 2021
1792 (1)	200:18,20;204:18;	215:17		
88:6	205:20;213:9,16;	30236 (3)	_	
1793 (2)	203:20;213:9,16; 217:4;248:9,12;	17:4;47:6;73:2	5	
86:22,25	249:1;251:8;252:23;	30th (2)		
1795 (2)	256:9;270:3,11	90:24,25	5 (5)	
86:13,25	2014 (1)	31 (7)	87:9;94:5,7;183:12;	
17th (2)	202:12	145:20;147:13;	269:22	
81:7;216:15	2015 (2)	150:10;151:8,9,24;	5:59 (1)	
18 (2)	57:10;85:21	216:11	272:15	
47:24;56:17	2017 (3)	312 (1)	50 (4)	
19 (3)	180:1,3,11	106:11	87:13;91:7;95:5;	
47:15;80:25;236:14	2018 (7)	314 (1)	211:12	
1998 (2)	56:23;58:2;59:1;	106:11	500 (1)	
51:18;54:15	177:17,18;224:21,21	31st (6)	124:19	
1999 (1)	2020 (4)	145:13;147:23;	501c3 (2) 25:18;253:19	
54:16	214:21,24;215:9;	151:17;157:14;161:4;		
	216:16	202:12	5K (3) 201:11,13;231:25	
2	2021 (1)	32 (3)		
_	5:3	86:9,12;88:22	5s (3) 66:1;91:9;94:2	
2 (5)	20th (2)	33 (2)	5th (2)	
72:9;143:6;169:24,	73:18;177:17	88:18;90:8	225:11,12	
25;249:8	21 (2)	34 (1)	223.11,12	
2,000 (1)	194:18;198:22	93:8	6	
272:5	21st (2)	35 (1)	U	
20 (7)	177:18;180:10	221:17	6 (5)	
96:24;106:7;143:5;	22 (1)	36 (8)	153:17;198:7;	
145:11;179:25;	197:25	168:7,14;175:25;	204:18;260:23;261:1	
204:21;213:13	22nd (1)	177:5,6,25;178:4;	6/16/2020 (1)	
2000 (2)	180:3	179:3	215:18	
206:13,13	23 (2)	37 (5)	6/30/2011 (1)	
2002 (2)	121:13;199:15	175:18;177:6,25;	90:13	
55:11,12	232 (1)	179:18;180:10	6/7/2013 (1)	
2003 (1)	72:1	38 (4)	106:15	
55:12	239 (1)	179:21,21;180:7,10	6:02 (1)	
2007 (5)	72:2	3rd (7)	272:23	
55:25;56:15;73:19;	23rd (2)	43:22;150:2,8;	678 (1)	
117:9;223:10	131:7;221:22	151:11,11,16;152:23	41:7	
2008 (4)	24 (1)	_		
97:22;221:23;	200:13	4	7	
222:2;225:12	25 (1)			
2009 (3)	202:7	4 (3)	7 (1)	
56:17;58:2;85:21	26 (2)	87:17;94:5,7	114:11	
2010 (5)	203:25;204:12	4:00 (1)	7th (2)	
52:20;56:13;90:16,	27 (2)	147:3	106:10;150:9	
23;103:13	204:11,14	40 (5)		
2011 (13)	28 (2)	91:6;248:25;270:6,	9	
90:17,20,25;92:18;	205:16;213:5	9,18		
114:15;118:13;	28th (2)	405 (1)	9 (1)	
202:21;204:21,24;	144:2;145:12	47:5	47:15	
247:3,3;248:9;249:10	29 (1)	409-9293 (1)	904 (1)	
2012 (10) 42:18;80:10;92:16;	213:4 29th (1)	41:7 45 (2)	198:5	
153:14,15;202:22,22;	93:12	45 (2) 51:2;95:5	904-905 (1)	
248:9;249:7;251:7	73.14	46 (1)	198:5	
2013 (38)	3	91:7	98 (1)	
39:18;41:19;43:22;	J	49 (1)	249:9	
80:10;81:7;93:12,16;	3 (13)	87:12	9th (1)	
106:10;114:11;	71:25;73:2;88:5;	4s (3)	168:15	
118:22;121:3,13;	91:14;94:8;123:20;	66:1;91:9;94:2		
131:7;144:2;145:20;	168:24;170:9,19;	4th (7)		
150:3,10;151:24;	175:25;178:12;	54:16;205:20,21;		
152:23;153:17;	240:16;249:7	206:14;207:20;213:9,		
168:15;194:19;198:7;	30 (1)	14		

Memorandum of Understanding



Between

Superior Court of the State of Georgia for the County of Clayton

And

Clayton County CASA

MISSION STATEMENT

The Clayton County CASA program provides advocacy and intervention to abused and neglected children in foster care and relative care custody, as well as, Guardian Ad Litem services to children involved in custody disputes through commitment to the following program values:

- Competent professional staff
- Supportive environment for recruitment, training and retention of volunteers
- Opportunities for volunteers to form caring, committed, relationships with children and their families
- Provision of concise meaningful reports containing thoughtful well-reasoned recommendations that assist the Court in meeting the needs of the child

THE GOAL OF CLAYTON COUNTY CASA

To be an effective response to a growing need for children to have a voice in deprivation and custody dispute proceedings by recruiting, training and supporting CASA volunteers who advocate for the best interest of the child.

The Clayton County CASA program is organized as a division of the Clayton County Juvenile Court and is given authority to recruit, train, support, and supervise CASA volunteers who serve as advocates for children under both a Clayton County Superior Court Order and a Clayton County Juvenile Court Order.

Achieving the goal of the CASA/Guardian Ad Litem service to children involved in custody dispute proceedings requires the development of a working relationship between the Clayton County Superior Court and the Clayton County CASA program. This Memorandum of Understanding identifies and clarifies that relationship.

Section I. Cases to be Referred to a CASA Program

Custody dispute cases under the jurisdiction of the Clayton County Superior Court where the judge requests CASA involvement are proper for referral to the Clayton County CASA program.

Section II. Administrative Fee

Clayton County CASA will charge a flat \$500 administrative fee. All monies must be received by CASA prior to commencement of investigation by CASA. If the \$500 administrative is not paid the CASA investigation will not commence until the administrative fee is received.

Order for payment of costs of Guardian Ad Litem services will be sent to the respective parties by the Clayton County Superior Court and shall include the following statement: "Cash and money order are acceptable means of payment. No personal checks will be accepted; however, a check drawn on the respective attorney's firm will be accepted for payment. All fees shall be paid to Friends of Clayton County CASA, Inc., Care of Gerald Bostock, Program Coordinator of CASA; Clayton County Juvenile Court; 121 S. McDonough St. Courthouse Annex 3; Jonesboro, GA. 30236."

The Clayton County CASA Advisory Board is the recipient of the administrative fee and will use the fees to fund volunteer recruitment, training, and retention.

Section III. Role and Responsibility of a CASA Volunteer
The roles and responsibilities of the CASA/Guardian Ad Litem (GAL) are as follows:

- A. The CASA/GAL's Role: The CASA/GAL is a volunteer of at least 21 years of age from the local community who has been screened and completed the 40 hour state-certified CASA training program, as well as, has received 8 hours of investigative training related to Superior Court custody cases. A CASA/GAL is appointed by the judge as an officer of the Court to advocate for children who are involved in custody dispute proceedings. The role of the CASA/GAL is to provide the Superior Court with independent and objective information regarding the status of children involved in custody dispute matters. Upon appointment, the CASA/GAL independently gathers and evaluates information which the judge will take into consideration in making a decision to protect the best interests of the child.
- B. The CASA/GAL responsibilities under the Court include:
 - Independently gathers pertinent information to determine what is in
 the best interest of the child/children involved in the custody dispute;
 by reviewing all relevant records and interviewing interested parties to
 ascertain the facts and circumstances as related to the present case.
 - Develops and submits written and verbal reports to the Court and to the respective attorneys for review
 - Reports to and is supervised by Clayton County CASA Special Assistant for Judicial Investigations

C. A CASA/GAL MAY NOT:

- Become inappropriately involved in a case by engaging in activities which endangers the wellbeing of the child, the integrity of the program, or the objectivity of the volunteer
- Be involved in activities that are likely to result in a conflict of interest
- Give legal advice
- · Provide therapeutic counseling
- Make placement arrangements for a child
- · Be related to any parties involved in the case

Section IV. Implementation of Volunteer Activities

- A. Appointment: Appointment of a CASA/GAL will begin with an Order of Appointment from Superior Court and will remain in effect until the CASA/GAL's service is terminated.
- B. Assignment:
 - 1. Once a determination is made that a Superior Court case requires a CASA/GAL, the following is requested:
 - a) A copy of the initiating complaint and any other pertinent information shall be forwarded to the Special Assistant in order to determine the CASA/GAL who will be assigned to the case for investigation
 - 2. The Special Assistant or his/her designee assigns an available CASA/GAL as soon as possible
 - 3. After assignment of the CASA/GAL is determined, the name will be forwarded to the Superior Court and an Order of Appointment will be processed
 - 4. After the judge signs the CASA Appointment Court Order, the Order is returned to the Special Assistant or his/her designee at Clayton County Juvenile Court (121 S. McDonough St. Courthouse Annex 3, Jonesboro, GA. 30236)
 - 5. The Special Assistant receives the Appointment Order and notifies the assigned CASA/GAL of appointment
 - 6. The CASA/GAL receives the certified copy of the Appointment Order and should be prepared to review all pertinent records and/or documents once the administrative fee has been received from each party
 - 7. The Special Assistant will forward a letter to the attorneys, of each party, requesting:
 - a) A list of witnesses that will be interviewed on their client's behalf (the list of witnesses shall be limited to ten names). This list shall include the names; addresses and telephone numbers of the witnesses
 - b) An appointment will be scheduled with the attorney and his/her client to be conducted at the Clayton County Juvenile Court and fees may be submitted for services at this time

- 8. Through the CASA/GAL Order of Appointment, The CASA/GAL becomes a party to the case
- 9. This assignment process may be revised and updated as necessary to meet the needs of the Superior Court and the Clayton County CASA program
- C. Procedure of Information Gathering: Once the CASA/GAL has been assigned, the Special Assistant will review the case file and will discuss with the CASA/GAL his/her duties in the case. The CASA/GAL shall conduct an independent and objective investigation in order to gather pertinent factual information to present to the judge to determine the best interest for the child/children. The investigation shall include interviews with and observations of the child, interviews with other individuals that may help in determining what is in the child's best interest, and a review of the relevant records and reports of the case.

The duties the CASA/GAL will perform include:
Interviews:

- 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.

<u>Verbal Reports</u>: 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/GAI has a mandatory obligation to immediately report any suspicion of child abuse or neglect to the Department of Family and Children Services.

<u>Testimony</u>: 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, ine/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
 - 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/GAI 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.

1		vun	<u>- U</u>	<i>Y</i> -	+
M	attle	Own	Sim	mhns	1

Chief Judge

Superior Court Clayton Judicial Circui

K. Van Banke Chief Judge Juvenile Court Clayton Judicial Circuit

Plante

Gerald Bostock
CASA Program Coordinator
Juvenile Court of Clayton County

Date: 11-20-07

Date: /2/17/07

Date: 12/13/07



Clayton County Internal Audit Department



Clayton County Juvenile Court CASA GAL Program Cash Controls Audit Final Report

May 2013

"promoting efficient & effective local government"

INTRODUCTION

In response to a request from Chief Juvenile Court Judge Steve Teske and a directive from Chairman Turner we have conducted an audit of the Friends of Clayton County CASA accounts. The focus of the audit was an in-depth review of the overall custodial management of the CASA Guardian Ad Litem account.

STATEMENT OF OBJECTIVES

Our objective in conducting the audit of the CASA (Court Appointed Special Advocate) program funds account was to evaluate the internal controls and procedures for receipting and disbursement. We also focused on whether or not the funds are used in accordance with the established Friends of Clayton County CASA (FCCC) By-Laws and Memorandum of Understanding between the Chief Judge of Juvenile Court and the Chief Judge of Superior Court in Clayton County.

STATEMENT OF SCOPE AND METHODOLOGY

To address the audit objectives and as part of our assessment of risk we:

- Reviewed the CASA Memorandum of Understanding (MOU) and By-Laws of Friends of Clayton County CASA, Inc. to get a clear understanding of the policies associated with the funds.
- Reviewed bank statements, receipts, and reimbursement documents related to the CASA funds.
- Interviewed management and staff including the following: Child Welfare Services Coordinator (also referred to as Staff Liaison or Program Coordinator), CASA Special Assistant for Judicial Investigations, CASA Volunteer Training Supervisor, and the Ambassadors Behind CASA (ABC) Board Chairperson.

STATEMENT OF AUDITING STANDARDS

The audit was conducted in accordance with Generally Accepted Government Auditing Standards and according to the Standards for the Professional Practice of Internal Auditing of the Institute of Internal Auditors. Those standards require that we plan and execute the audit to obtain sufficient and appropriate evidence in order to provide a reasonable basis for our findings and conclusions based on the audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

BACKGROUND

The Clayton County CASA program was designed to provide 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. The Clayton County CASA program serves as a division of the Clayton County Juvenile Court; however, the GAL program advocates for children under a court order from Superior Court.

Under Juvenile Court, this CASA GAL program is given the authority to supervise the recruitment, training, retention, and ongoing support for the CASA volunteers.

The Friends of Clayton County CASA, Inc. (FCCC) is designated by the State of Georgia as a non-profit corporation. There are three bank accounts associated with CASA: Friends of Clayton County CASA, Inc., Friends of Clayton County CASA, Inc. DBA Guardian Ad Litem, and Ambassadors Behind CASA. All three accounts are established through Heritage Bank and used for the purposes of managing donations and transactions related to CASA activities. All three accounts were reviewed; however, the focus of the audit was primarily with the Guardian Ad Litem account. This account collects administrative fees of \$500 per case, as ordered by Clayton County Superior Court. We reviewed transactions from February 2011 to April 2013.

OBSERVATIONS AND RECOMMENDATIONS

As part of this audit we conducted an overall risk assessment of how the CASA GAL funds are utilized. We assessed the current processes with internal control, accountability, oversight and risk in mind. Areas of concern and recommendations are as follows:

Clayton County CASA programs currently have no written policies and procedures regarding specific details of how the funds should be maintained. There are also no specifics on what is acceptable under the categories of volunteer recruitment, training, and retention.

We recommend implementation of a detailed SOP (Standard Operating Procedure) for internal cash controls immediately. All CASA employees should have a copy and/or have access and knowledge of all policies and procedures pertaining to these accounts. The (SOP) manual should include detailed instructions on receipting payments, deposits, cash custodians, separation of duties, disbursements/expenditures, and safeguarding of assets. The SOP should also list categorized details about what expenditures are acceptable for the program. In order to lower risk; controls must be established and strictly enforced.

The Child Welfare Services Coordinator is the primary custodian of the GAL account. The Coordinator processes payments, reimbursements, writes checks, and makes

deposits. If the Coordinator is not available to process GAL administrative fee payments, any of the nine CASA employees may process payments for the GAL account. The employees will hold the payments at their desk until they are able to give them to the Coordinator for deposit. Once the Coordinator receives payments, the funds are kept in a locked drawer inside of a locked office until deposited. There is no safe in the area.

We recommend that all GAL administrative fees be paid/received through the office of the Clerk of Juvenile Court. This will minimize the number of employees processing transactions, provide a central location for receiving payments, and minimize risk associated with cash controls.

Also, the Child Welfare Services Coordinator's activity with the funds is a direct violation of separation of duties. Ideally, there should be one or a limited number of employees who are authorized to process disbursements, separated by a person designated to make deposits.

The Child Welfare Services Coordinator has discretionary spending authority over the GAL account. All GAL administrative fee payments must be paid to Friends of Clayton County CASA, Inc. in the care of the Coordinator's name. Expenditures from the GAL account over \$500 must include two signatures which may also include one of the CASA Advisory Board members. The Coordinator also has two debit/credit cards imprinted with his name: one each for the Friends of Clayton County CASA, Inc. and Friends of Clayton County CASA DBA Guardian Ad Litem accounts.

According to the Advisory Board Chairperson, most fund expenses and anticipated expenses should be discussed at the board meetings. Our review of the GAL bank statements leads us to believe that there is very little oversight concerning the day-to-day and weekly expenditures made from the account.

We recommend the initiation of monthly reports which list the details of the expenditures and how they align with the mission of funding volunteer recruitment, training, and retention.

Although the Child Welfare Services Coordinator serves as liaison between the CASA program and the Courts, it is not best practice for one person to have the sole authority over Court ordered fees without any oversight.

Guardian Ad Litem - Bank Statement Transactions

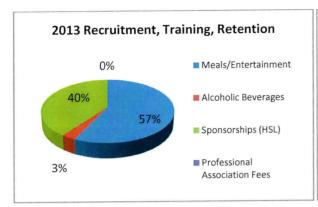
According to the bank statements available for review at the time of the audit, the total amount of administrative fees which have been deposited into the GAL account from February 2011 to April 2013 is \$14,853.28. The total amount of funds expensed during this same period was \$12,294.17. The following chart includes the type of expenses incurred:

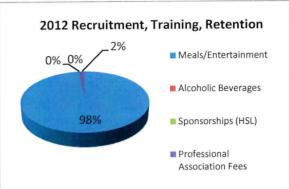
Expenses	Jan – Apr	2013	2012		2011		Totals
CASA Events	\$ 0.00	ο%	\$ 214.05	5%	\$ 739.79	14%	\$ 953.84
Staff/Volunteer Reimbursement	\$ 582.43	22%	\$ 1,412.28	33%	\$ 339.72	6%	\$ 2,334.43
Recruitment, Training, Retention	\$ 1,026.22	38%	\$ 576.16	14%	\$ 1,893.10	35%	\$ 3,495.48
Miscellaneous	\$ 1,082.74	40%	\$ 2,046.76	48%	\$2,380.92	44%	\$ 5,510.42
Total Expenses Per Year	\$ 2,691.39		\$4,249.25		\$5,353.53		\$12,294.17
Deposits	\$3,000.00		\$4,322.28	1	\$7,531.00		\$14,853.28

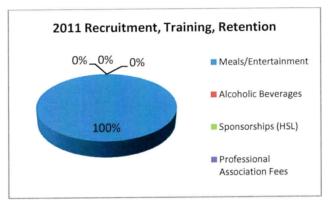
*Note: Bank Statements not available for review: Jan 2011, May-July 2012, September-October 2012

- CASA Events food and coat drives, DFCS Appreciation, caseload event, Braves tickets.
- Staff/Volunteer Reimbursement travel, sponsor meetings, notary certification.
- Recruitment, Training, Retention entertainment, meals for staff meetings and volunteers, alcohol, sponsorships, professional association fees.
- Miscellaneous retail store purchases (Ikea, Dollar General, Best Buy, Lowe's, Home Depot), gas station, car wash, Marriott Hotel charges.
- Dollar amounts from missing bank statements are excluded from the chart.
 Missing bank statements give way to for speculation of impropriety. Lack of an
 audit trail should be considered a red flag to management. If the bank
 statements become available at a later date, we will be willing to audit the
 information at management's request.

The category of Recruitment, Training, and Retention include various CASA related lunch and dinner meetings at restaurants and bars. The following pie charts compare approximate percentages of these charges as related to meals, alcohol, and training.







Many of the audited receipts were for restaurants and bars; many of which were located outside the Clayton County area. The auditors found that details of the disbursements were missing from many of the actual transactions. Also, there was evidence of GAL funds being expensed on alcoholic beverages at restaurants, bars, and package stores.

We recommend that the GAL account be reconciled on a monthly basis to ensure that adequate checks and balances are in place to prevent any misuse of funds. Strict guidelines regarding meals and entertainment should be initiated and enforced by all managing parties; especially disbursements concerning alcohol.

The GAL bank statement dated February 2012 included a payment to Birch Communications for monthly phone expenses at the CASA office. When reviewing the FCCC account, it was common to see this expenditure paid from the FCCC account.

We recommend payments for office communications expenses are not paid from the GAL account. It does not align with the mission of volunteer recruitment, training, and retention.

On the bank statement dated January 2013, a \$500 donation for an ABC Christmas Luncheon was deposited into the GAL account. On the same statement, the Child

Welfare Services Coordinator wrote himself a reimbursement check for the same luncheon for \$428.41. There was no documentation or receipts provided to support the reimbursement. It is our understanding that sponsors are secured for donations and all donations should be deposited into either the FCCC or ABC account.

The GAL bank statement dated April 2013 included another check written by the Child Welfare Services Coordinator to himself in the amount of \$82.57 for reimbursement for an AT&T sponsor dinner meeting. There was no documentation or receipts provided to support the reimbursement.

The March 2013 GAL bank statement included charges for several sponsor meetings at various restaurants. According to the Articles of Incorporation for the FCCC non-profit designation, the FCCC will increase public awareness of the program, recruit volunteers and raise funds.

All donations made to CASA must be deposited into the Friends of Clayton County CASA, Inc. account or ABC account. Court ordered administrative fees are the only funds that should deposited into the GAL account.

At no point should a cash custodian write himself/herself a reimbursement check. There should be another person authorized to approve such expenses and disburse checks as long as sufficient documentation is provided. This is another example of a violation of separation duties.

The Child Welfare Services Coordinator has sponsored an adult softball team, of which he is a member of, using funds from the CASA GAL account. The softball team is part of the Hotlanta Softball League (HSL) out of the city of Atlanta. The Coordinator stated that he had spoken to two advisory board members and received authorization and support for this expenditure. According to the Coordinator, the purpose of the sponsorship is to raise awareness to the CASA program. Part of the expenses incurred with this sponsorship included a reception held in Birmingham, Alabama, that was paid for out of the GAL funds.

It is our opinion that sports league sponsorships do not fall within the current intentions of the GAL account. However, if the Chief Judges decide this type of expenditure to be acceptable, details should be included in the MOU.

We recommend that any CASA sponsored sports leagues be based in Clayton County to increase awareness and recruit volunteers in the immediate area. We also recommend the SOP require official

written requests and authorization for all sponsorships and strict guidelines of acceptable expenditures in this area.

CONCLUSION

The accounting controls concerning the CASA program funds are relatively non-existent, lack structure, and leave room for inconsistencies surrounding the cash reporting and documentation process. Lack of oversight to these accounts, particularly the Guardian Ad Litem account, will increase risk and could result in loss of credibility to a program that has an outstanding reputation across Clayton County and the State.

Steven C. Teske Chief Judge

Deitra Burney-Butler Judge

Bobby D. Simmons
Judge



John P. Johnson, III Director of Juvenile Court Services

> A. Colin Slay Chief of Staff

Robin Austin Clerk of Court

Juvenile Court of Clayton County

June 3, 2013

Gerald L. Bostock 121 Pine Circle Jonesboro, GA 30236

Dear Mr. Bostock,



It is the intention of this administration to terminate your employment with the Clayton County Juvenile Court. Immediately after receiving this notice, you will be placed on (paid) administrative leave. You are directed to gather your personal belongings and leave the courthouse premises. You are further directed to report to my office at 4:00 p.m. today to respond to this notification. At that time, you will have the opportunity to state your case as to why your employment should not be terminated.

Based on the findings of an Internal Audit conducted in May, 2013 and by information supplied by you regarding the expenditures of the GAL Funds, it is believed that you have violated Clayton County Civil Service Rules 9.206(e)(k):

- 1. Guilty of conduct unbecoming of an employee of Clayton County.
- 2. Incompetent, negligent or inefficient performance in the duties of the position held.

The findings of the audit reveals numerous inappropriate expenditures of the GAL funds which have no direct connection to the recruiting, training and retention or supporting of CASA Volunteers. You claim that your use of these funds was for the recruitment of CASA Volunteers, the evidence is to the contrary. It is unreasonable to use the GAL Funds, designated by this Court to be used solely for the recruitment, training and retention of Clayton County Volunteers to sponsor a softball team outside of Clayton County — a team that you play on which serves as a personal benefit to you. Furthermore it is unreasonable to expend these funds for entertainment, meals, and alcoholic beverages for engagements in and around the Midtown Atlanta area (maybe others) which to include your friends.

Sincerely,

John P. Johnson, III

Director of Juvenile Court Services

cc:

Judge Steven C. Teske

Colin Slay

JPJ/jw

Clayton County Youth Development and Justice Center • 9163 Tara Boulevard • Jonesboro, Georgia 30236 Telephone: (770) 477-3270 • Intake: (770) 473-5977 • Fax: (770) 477-3255 CLAYTON_000370



Fw: court items

Janice Wilson to: John Johnson

04/23/2013 03:00 PM

Janice Wilson Juvenile Court Office Administrator 770-477-3244 770-603-4176 (fax)

---- Forwarded by Janice Wilson/Juvenile Court/Clayton on 04/23/2013 02:58 PM --

PLAINTIFF'S EXHIBIT 19

From:

John Johnson/Juvenile Court/Clayton

To:

Janice Wilson/Juvenile Court/Clayton@Clayton, Colin Slay/Juvenile Court/Clayton@Clayton

Date:

01/17/2013 01:56 PM

Subject:

Fw: court items

— Forwarded by John Johnson/Juvenile Court/Clayton on 01/17/2013 01:55 PM ——

From:

Shawn Black <shawnwblack@gmail.com>

To:

John Johnson < John.Johnson@co.clayton.ga.us>

Date:

01/17/2013 12:41 PM

Subject:

Re: court items

Hey, I just got your message, Colin's card and a certified letter from Gerald about how he had tried "numerous" times to get me.

My number has not changed since 1999, yet I have gotten no voicemails or calls from Gerald. This letter is the first I have heard from Gerald since around December 6 or 7th. I have had these items in a bag since December 31. I'm not sure if he was contacting me on the county cell which has been it off since December 31st or maybe he was emailing me on my deactivated county email.

Normally I would expect more, but I have to remember who we are talking about. I do want to say as I exit my employment that you should really look at CASA and how the fundraising money isn't actually spent on the children. I have kept quiet about a lot while working for Gerald just because I needed my job. Since I don't have that anymore, I'm going to point out a few things.

Duck Derby and GAL funds are spent to buy alcohol, lunches for staff that he chooses to hang with. I have heard how special treatment was given to certain people and I closed my ears. It is tearing your staff apart because some CASA staff gets badges (1 staff member) and also treated different as far as coming and going as she wants without any consequences. Other staff members are not allowed to even leave the building on certain days.

Nobody monitors the GAL account. Funds have been used to move Gerald's furniture during the courthouse move, paying for him to treat people to lunch, removing a boot from his car because he parked illegally, many other things that should not be included in charity money expenditures.

I wasn't going to do this because I just wanted to be rid of all of the drama that Unit brought into my life. However, I think it's time someone tells the truth about the program. Just like we supposedly have 110 or more volunteers, how is that when each of four supervisors have less than 20 volunteers each and half of them haven't been active in many months.

If one domino isn't placed right that whole unit is going to crumble and it will never be said that nobody knew.

I am not saying any of this to be mean or piss anyone off, just simply because when it does come out, the whole court is going to look bad and that court is not bad at all. Clayton County Juvenile Court is one of the best, if not, the best I have ever seen and I have been in a few of them that boast to be some of the best.

Thanks for listening and I will get in touch with whomever I need to so that you can get these items.

Thanks for calling and emailing. Always amazing how you get me and Colin gets me on first try but Gerald can't.

On Jan 17, 2013, at 9:54 AM, John Johnson < John Johnson a co.clasion.ga.us> wrote:

Shawn u have a file and ID and court phone that we need to get asap. Please call me.



MEMORANDUM

9163 Tara Boulevard - Jonesboro, Georgia 30236 - 770.473.5977



Date:

June 7, 2013

To:

Investigator Allen Crenshaw, Clayton County District Attorney's Office

CC:

Chief Judge Steven Teske, Clayton County Juvenile Court John P. Johnson III, Director of Juvenile Court Services

From:

A. Colin Slay, Chief of Staff

Subject:

Statement regarding the misuse of Guardian Ad Litem funds by Gerald Bostock

The following constitutes a chronicling of my involvement in this personnel investigation. If you have any questions, I can be reached at (770) 477-3248.

Since July 2009, I have served as the chief of staff for the Juvenile Court. I report directly to John Johnson, Director of Juvenile Court Services. Gerald Bostock, the former child welfare services coordinator, reported directly to me until termination of his employment on June 3, 2013.

On October 12, 2011, I received instructions from Mr. Johnson to investigate the receipt of monies by Carol Gossett, a court officer at the time assigned to child welfare services, in relation to the Guardian Ad Litem (GAL) program, a joint venture of the Juvenile Court and Clayton County Superior Court. The scope of my instruction was to investigate how the money was collected and the documentation process of those receipts. My investigation found that the monies associated with the program were being collected and deposited in accordance with the 2007 Memorandum of Understanding between the Juvenile Court and Superior Court and that there was a process for recording those receipts. Following the investigation, Mr. Johnson requested that Mr. Bostock start providing copies of the bank statements from the GAL account – Mr. Bostock did so, albeit on an inconsistent basis.

In late January 2013, I became aware of an email a former employee, Shawn Black, sent Mr. Johnson raising concern about how the GAL monies and other funds collected by the Friends of Clayton County CASA (FCCC) were being spent by Gerald Bostock. Specifically, Mr. Black shared that the funds, the primary purpose of which are to support the CASA program with volunteer recruitment, retention and training, were being spent on meals, alcohol and other personal expenses by Mr. Bostock. While the matter was greatly concerning, because the money in question all belongs to FCCC, a separate non-profit organization for which we have no authority or oversight, Mr. Johnson and I struggled with how to go about looking into the matter without overstepping our legitimate authority.

In late March 2013, we were notified by Internal Audit that they would soon be conducting routine audits of all cash handling, county-wide. Seeing this as an opportunity, on the day of our audit, Mr. Johnson asked the auditors to look into the handling of the GAL funds since those funds were being

MEMORANDUM PAGE 2 OF 3

collected by county employees in the child welfare services unit. The auditors interviewed Mr. Bostock, and on April 23, 2013, Mr. Johnson was notified by Stacey Merritt, director of Internal Audit, that the GAL funds needed further investigation due to red flags raised during her interview of Mr. Bostock. Specifically, Ms. Merritt expressed concern about the record keeping and Mr. Bostock's level of authority to use the funds at his discretion. Based on that and other information received from child welfare services staff in the interim, Mr. Johnson shared the concerns with Chief Juvenile Court Judge Steven Teske. On May 1, Judge Teske directed Mr. Johnson to request of Chairman Turner that Internal Audit perform a more thorough audit of the GAL funds. Chairman Turner agreed and ordered the audit. When Mr. Johnson and I notified Mr. Bostock of the pending audit, he responded by asking what right we had to look into the matter since the money belonged to FCCC and was not the property of the Juvenile Court.

On May 23, 2013, Mr. Johnson and I met with Ms. Merritt and Leslie Moore of Internal Audit to discuss their findings. The report showed numerous inconsistencies in record keeping and shared concerns that Mr. Bostock was spending money on items that personally benefited him and was doing so without any direct oversight by the FCCC board of directors, the holder of the funds. Money was spent in restaurants and bars, to sponsor Mr. Bostock's own softball team, and on other questionable purchases. It was revealed that Mr. Bostock was not only given signatory authority on FCCC's checking account, that he had also been issued a debit card in his name for the GAL funds and one for another FCCC bank account. That same afternoon, Mr. Johnson and I shared the report with Judge Teske. He contacted Matt Sorenson, Superior and State Court administrator, and asked him to advise Chief Superior Court Judge Deborah Benefield of the audit. Judge Teske, Mr. Johnson, and I then went to Human Resources and met with the auditor, Leslie Moore, and HR director Renee Bright to discuss the audit. It was decided in that meeting that Judge Teske would propound a series of questions demanding answers regarding the audit findings from Mr. Bostock. Mr. Johnson and I delivered those questions to Mr. Bostock on May 28, 2013. We received the answers on May 31, 2013. At that time, I demanded that Mr. Bostock surrender the FCCC debit cards and check books. He claimed that the check books were delivered to the FCCC treasurer earlier that week, and he only produced one debit card, drawn on the GAL account. That card was delivered to FCCC board chair, Sabrina Crawford, when Judge Teske and I met with her on May 31, 2013. She was made aware of the pending audit, investigation, and likelihood of adverse action against Mr. Bostock. Judge Teske asked her to keep it all confidential.

Also, on May 31, 2013, Judge Teske and I met with DA Tracy Lawson and chief investigator Paul Garland to share our concerns and the findings of the audit. Mrs. Lawson made the determination to open an investigation by her office.

Mr. Bostock's answers to the questions were determined to be insufficient, and on June 3, 2013, he was served with a notice of intent to terminate his employment because of negligence, incompetence, and conduct unbecoming. In the days following, we have continued to uncover evidence of poor record keeping practices and other concerning matters, including missing cash (cash, checks and receipts for GAL funds received in 2012, as well as checks and cash received for the 2012 Duck Derby fundraising event were found in the credenza in Mr. Bostock's office on June 6, 2013 – according to the receipts, \$200 cash is missing – the money was inventoried and secured in the Juvenile Court Clerk's safe) and missing property that was purchased with GAL funds, including a smart phone and digital camera. Subsequent discussions with FCCC board members and child welfare services staff also leads me to conclude that Mr. Bostock was intentional in his misuse of GAL funds, and that he possibly misled FCCC board members about their responsibility to oversee and approve expenditures.

MEMORANDUM PAGE 3 OF 3

Based on my investigation and subsequent discussions, I believe the following persons have information relevant to this investigation:

- 1. Judge Steven Teske, Chief Judge, Clayton County Juvenile Court
- 2. John Johnson, Director of Juvenile Court Services
- 3. Carol Gossett, Interim Child Welfare Coordinator (former investigator for the Superior Court GAL program), Clayton County Juvenile Court
- 4. Becky Galbreath, Clayton County Juvenile Court
- 5. Kimberly Walker, Clayton County Juvenile Court
- 6. Requeral Stoutamire (Mr. Bostock's program assistant), Clayton County Juvenile Court
- 7. Shelley Johnson, Clayton County Juvenile Court
- 8. Annell Graniella, Clayton County Juvenile Court
- 9. Kimberly Walker, Clayton County Juvenile Court
- 10. Hawa Minor, Clayton County Juvenile Court
- 11. Concilia Chilumuna, Clayton County Juvenile Court
- 12. Sabrina Crawford, FCCC board chair
- 13. Stan Owen (Clayton County Sheriff's Office), FCCC board member
- 14. Debbie Stinson, Clayton County Juvenile Court, FCCC board member
- 15. Ginger Bedell, Clayton County Tax Assessor, former FCCC board member
- 16. Shawn Black, formerly employee of Clayton County Juvenile Court

It should be noted that in the midst of the investigation, Judge Teske directed that all GAL funds be paid to the Clerk of the Juvenile Court for proper accounting and to be held in trust until proper oversight and control mechanisms could be put in place by the Juvenile Court and Clayton County Finance. The MOU governing the GAL program has also been redrafted to remove the money from the control of FCCC, making the Juvenile Court the receiver, and is currently awaiting approval by the Superior Court judges. Judge Teske has also requested a meeting with the FCCC board where he will ask for their cooperation in strengthening their oversight and governance procedures, a requirement if the Juvenile Court is going to allow FCCC's affiliation with our CASA program to continue.

A. Colin Slay Chief of Staff

Clayton County Juvenile Court

CLAYTON 000314



MEMORANDUM

9163 Tara Boulevard - Jonesboro, Georgia 30236 - 770-473-5977



Date:

June 12, 2013

To:

Carol Gosssett, Child Welfare Coordinator

CC;

John P. Johnson III, Director of Juvenile Court Services

From:

A. Colin Slay, Chief of Staff ACS

Subject:

Documents requested by the DA's Office

We have received a request from Deputy Chief Investigator Allan Crenshaw of the Clayton County District Attorney's Office in connection to the ongoing investigation regarding the use of GAL funds. Please have your staff begin collecting, labeling and boxing the following original documents (please make copies of all documents for our continued use). The documents need to be ready for delivery to Investigator Crenshaw no later than Monday, June 24, 2013. Please let me know if you have any questions. Thank you for your assistance in this matter.

- Financial records (account numbers, bank statements, draft books, receipts of expenses, debit card numbers, etc.) of all FCCC bank accounts:
 - a. Friends of Clayton County CASA
 - b. Friends of Clayton County CASA DBA Guardian Ad Litem
 - c. Ambassadors Behind CASA
- 2. Incorporation documents, by-laws, and any governing policies of FCCC
- 3. Dates of FCCC board meetings and all minutes or records related to those meetings
- 4. Listing and contact information for all past and present FCCC board members and officers
- 5. Information pertaining to the Hotlanta Softball League sponsorship (name of team, amount of sponsorship, etc.)
- 6. Listing and contact information for all CASA staff



OFFICE OF THE DISTRICT ATTORNEY CLAYTON JUDICIAL CIRCUIT

Investigative Summary

S.I. Number 13-06-008

On December 6, 2013, I sent an E-mail to COLIN SLAY requesting the following:

Complete list of names, and any and all application forms of volunteers that were involved with and served in some type of official capacity with CASA, Ambassadors Behind CASA, Duck Derby, Friends of Clayton County CASA, etc... (I have some of the names that are listed in the various Board sections of the GAL - Friends of CASA Binders.)

Heritage Bank Account for Friends of Clayton County CASA, INC., DBA Guardian Ad Litem (GAL) for year 2009, and January 1, 2010-March, 2010.

Information regarding whether Bostock was issued, or had access to a county vehicle, and if so the unit number of the vehicle?

(E-mail attached.)

ID Data:

Colin Slay
Chief of Staff
Clayton County Juvenile Court
Clayton County Youth Development & Justice Center
9163 Tara Boulevard
Jonesboro, GA 30236
770-477-3248

Prepared by: Allen L. Crenshaw Deputy Chief Investigator RE: SI 13-06-008 Page 2 of 2

Indictment Unit

Approved by: Paul Garland Chief Investigator

OFFICE OF THE DISTRICT ATTORNEY CLAYTON JUDICIAL CIRCUIT



CASE REPORT

RE: SI 13-06-008

On October 4, 2013, I spoke to Deputy Chief Investigator Allen Crenshaw regarding the investigation of Gerald Bostock, former Clayton County Juvenile Court employee who is alleged to have misappropriated funds from the Juvenile Court. Crenshaw advised he had meet with John Johnson, Director of Juvenile Court Services. Crenshaw advised he had received numerous documents and was in the process of reviewing them. I advised Deputy Chief Crenshaw that I would subpoena paycheck information from the Clayton County Finance Department to identify Bostock's bank account information. I also advised that I would have Investigator Mike Harris conduct an Accurint report on Bostock.

On October 7, 2013, I checked the Clayton County Criminal Justice Information System and found a Gerald Bostock listed. He had a date of birth of 01/13/1964 and a social security number of 254-13-7812. I printed the Incident Review screen for Bostock for this report. I also noted that Bostock had a State of Georgia Identification Number on his screen, indicative of an arrest in the State of Georgia.

On October 8, 2013, at 0913 hours, I contacted Colin Slay,

RE: SI 13-06-008 Page 2 of 3 October 8, 2013

Chief of Staff at the Clayton County Juvenile Court. I advised Mr. Slay that I was assisting in the Gerald Bostock investigation and was calling to verify Mr. Bostock's date of birth and social security number. Slay verified the date of birth of as 01/13/1964 and the social security number of 254-13-7812.

I ran a criminal history request on Bostock through the Georgia Crime Information Center, finding that it showed an open (no disposition) Driving Under the Influence arrest on 11-26-1982 by the Lanier County Sheriff's Office.

I provided a copy of Bostock's Clayton County Incident Review printout to Inv. Mike Harris, and requested an Accurint report on Bostock.

Attached:

- 1.) Clayton County Incident Review Report for Gerald Bostock, date of birth: 01/13/1964, social security number: 254-13-7812
- 2) State of Georgia Criminal History record for Gerald Bostock, Georgia State Identification Number GA00856834

I.D. Data:

Colin Slay, Chief of Staff Clayton County Juvenile Court 9163 Tara Boulevard Jonesboro, Ga. 30236 770-473-5923

10/07/13 09:35:06		OUNTY DISTRI		DAPC12A	DAS110
Name BOSTOCK GE			13 X X 1 X 1 - 1	LE#	1040029
Address 121 PINE C	IR JONESBORO G	Phone	678 873927	7 Additional	Pho NONE
DOB 01 13 1964 Sex SSN 254 - 13 - 781 CCID SI	L2 OLN/St 0532	509 Wgt 185 24183 FBI 580685AAS	GA Add	ir BRO Marks itional OLNS	NONE YES
O F F E			Cur DA		up Court
OP Date Time Co 050605 15:40 00 101304 14:50 16 011303 11:30 00	00500 WAF 50701H BUF	sc E RRANT APPL [RGLARY-RESI \ FO FOR OFFI]	VC1	Ct Inv Jg C	Clerk#

Bottom

F4=Prompt F5=Refresh Comment F9=Add Incident F19=Criminal History F20=QW F21=Print F22= IQ F23= FQ F24= KQ

SI 13-06-008 10/8/13 0913- called Colin Slay-Juneaule Court - surfeed DOB/SSN GA0310110CCAX00.CLYX-11039864 NCIC2 20131008 10:05:05 20131008 10:05:05 268244F F60

EL01268244EF602QR

GA031325A

THIS INTERSTATE IDENTIFICATION INDEX RESPONSE IS THE RESULT OF YOUR RECORD REQUEST FOR FBI/580685AA9. THE RECORD MAY BE OBTAINED FROM FILES WITHIN YOUR STATE. THE INTERSTATE IDENTIFICATION INDEX CONTAINS NO ADDITIONAL DATA.

END U*

GA0310110CCAX00.CLYX-11039863 GA-CCH 20131008 10:05:01 20131008 10:05:01 26824

Georgia Crime Information Center 3121 Panthersville Road Decatur, GA 30037 (404) 244-2639

Produced on 2013-10-08

This rap sheet was produced in response to the following request:

FBI Number 580685AA9

State Id Number GA00856834 (GA)

ARN 1040029

Purpose Code

Attention BAKER/JDB/SI 13 06 008

The information in this rap sheet is subject to the following caveats:

**THIS RESPONSE IS BEING PRODUCED FOR YOUR REQUEST SENT: 2013-10-08 (GA: 2007-08-11)

Important! Criminal history record information is obtained one of two ways: 1) by conducting an inquiry using personal identifiers such as name and date of birth (name search), or 2) by submitting fingerprint cards to the Georgia Crime Information Center (GCIC). When conducting a name search for criminal history record information, there is a possibility that the information returned belongs to a different person with the same, or similar, identifiers. In this case, a positive match of the person whose criminal history record is sought requires submission of fingerprint cards to GCIC. When conducting a fingerprint search for criminal history record information, the information returned does, in fact, belong to the individual. In this case, conducting a name search using the individual's personal identifiers would be the same information. (GA; 2007-08-11)

When the information contained in a criminal history report causes an adverse employment or licensing decision the individual, business or agency making the decision must inform the applicant of all information pertinent to the decision. The disclosure must include information that a criminal history record check was conducted, the specific contents of the record and the effect the record had upon the decision. Failure to provide all such information to the person subject to the adverse decision is a misdemeanor offense under Georgia law. Additionally, any unauthorized dissemination of this record or information herein also

violates Georgia law. The plea of nolo contendere may be considered a conviction for some purposes: however, except as otherwise provided by law, it shall not be used against the defendant in any other court as a conviction or admission of guilt or for the purpose of effecting any civil disqualification of the defendant to hold public office, to vote, to serve upon any jury, or any other civil disqualification imposed upon a person convicted of any offense under the laws of this state. (GA; 2007-08-11)

In the event that identifiers are not clearly associated to a specific cycle, the information is most likely non-fingerprint based information received from the Department of Corrections at the time of release from incarceration. (GA; 2007-08-11)

Subject Name(s)

BOSTICK, GERALD LYNN (2007-08-08) JARRY, (AKA) (2007-08-08)

Subject Description

FBI Number 580685AA9

State Id Number GA00856834

Social Security Number 259137812 (2007-08-08)

Race Sex

White (1982-11-26) Male (1982-11-26)

Height 5'10" (1982-11-26) Weight 155 (1982-11-26) Date of Birth

1964-01-13 (2007-08-08)

Hair Color

Eve Color

SSO

Brown (1982-11-26)

Hazel (1982-11-26)

Place of Birth JAPAN (1982-11-26)

III Record

99008907690 Offender Tracking Number (OTN) 1982-11-26 Earliest Event Date 1982-11-26 Offense Date 26891352

(Cycle 1) 1982-11-26 Arrest Date

Case Number

Arrest SRF

GA0860000 LANIER COUNTY SHERIFFS OFFICE BOSTICK, GERALD LYNN Arresting Agency Subject's Name

Subject's Name

Adult Arrest Type

Charge

Charge Tracking Number 99008907690-1 Charge Literal DUI - DRIVING UNDER THE INFLUENCE OF ALCOHOL

Statute 40-6-391(A)(1); GA

State Offense Code 5404

Severity Misdemeanor

Magistrate

Magistrate Agency GAGCIC000 (GEORGIA CRIME INFORMATION CENTER)
Magistrate Action TIME EXPIRED RESTRICTION

Magistrate Action TIME EXPIRED RESTRICTION

Magistrate Action Date 2013-07-01

Agency

LANIER COUNTY SHERIFFS OFFICE; GA0860000;

SHERIFF

Address

100 MAIN STREET

LAKELAND, GA 316350000

* * * END OF RECORD * * * U*



OFFICE OF THE DISTRICT ATTORNEY CLAYTON JUDICIAL CIRCUIT

Investigative Summary

S.I. Number 13-06-008

On Thursday, December 12, 2013, I received an email from Colin Slay regarding the 2013 Duck Derby Intakes binder. He advised that there was not a 2013 Duck Derby, so there is no binder.

ID Data:

A. Colin Slay

Chief of Staff

Clayton County Juvenile Court

9163 Tara Boulevard

Jonesboro, Ga. 30236

770-477-3248

colin.slay@co.clayton.ga.us

RE: SI 13-06-008

Page 2 of 2

Prepared by:

Allen L. Crenshaw

Deputy Chief Investigator

Indictment Unit

Approved by:

Paul Garland

Chief Investigator

Page 1 of 1

Re: 2013 Duck Derby Intakes Binder Colin Slay to: Allen Crenshaw 12/12/2013 01:27 PM Show Details

History: This message has been replied to.
There wasn't a Duck Derby this year -- it was canceled.

A. Colin Slay Chief of Staff Clayton County Juvenile Court

Clayton County Youth Development & Justice Center 9163 Tara Boulevard Jonesboro, GA 30236 770.477.3248 http://www.claytoncountyga.gov/courts/juyenile-court

Empowering the Community | Restoring Families

-----Allen Crenshaw/District Attorney Office/Clayton wrote: -----

To: Colin Slay/Juvenile Court/Clayton@Clayton

From: Allen Crenshaw/District Attorney Office/Clayton

Date: 12/12/2013 11:40AM

Subject: 2013 Duck Derby Intakes Binder

Colin,

I need to review the 2013 Duck Derby Intakes binder. I have the 2012 in my possession.

Thanks,

Allen L. Crenshaw
Deputy Chief Investigator
Indictment Unit
Office of the District Attorney
Clayton Judicial Circuit
Harold R. Banke Justice Center
Fourth Floor
9151 Tara Boulevard
Jonesboro, Ga. 30236
770-477-4585 (Direct)
678-898-4807 (CELL)
770-477-4577 (FAX)

ATTENTION: E-Mail Recipients!! This e-mail communication may contain or have attached confidential information, related to an individual, and intended solely for the addressee. Do not read, copy or disseminate this communication (other than to return it to the sender) unless you are the intended addressee. If you have received this message in error, please return the e-mail to the sender or call the sender, and delete the message from your e-mailbox.



OFFICE OF THE DISTRICT ATTORNEY CLAYTON JUDICIAL CIRCUIT

Investigative Summary

S.I. Number 13-06-008

On Friday, the 31st day of January, 2014, I prepared and sent an E-mail to Colin Slay requesting some information related to the investigation involving Bostock.

I requested to whom would be the point of contact for the individual(s) that could provide me documentation related to the cases that a judge ordered CASA intervention, and payments received. I also requested an update on the missing GAL bank statements, if they had been recovered. The missing records are as follows: January, 2011, May-June, 2012, and September - October, 2012.

ID Data:

A. Colin Slay

Chief of Staff

Clayton County Juvenile Court

9163 Tara Boulvard

Jonesboro, Ga. 3023770-477-3248

RE: SI 13-06-008

Page 2 of 2

Prepared by:

Allen L. Crenshaw

Deputy Chief Investigator

Indictment Unit

Approved by:

Paul Garland

Chief Investigator

OFFICE OF THE DISTRICT ATTORNEY CLAYTON JUDICIAL CIRCUIT



Investigative Summary

S.I. Number 13-06-008

On Friday, the 31st day of January, 2014, I received an E-mail response from Colin Slay, this regarding my request for the point of contact for information on the information on all CASA intervention cases, and if the missing GAL bank account statements have been located.

Mr. Slay advised that Carol Gossett is the best contact for facilitating the information on the CASA information, as well as, the bank statements. He added that he did not believe that the bank statements have been located, and added that he will forward the E-mail to Carol Gossett. (see attached E-mail)

ID Data:

A. Colin Slay

Chief of Staff

Clayton County Juvenile Court

9163 Tara Boulvard

Jonesboro, Ga. 3023770-477-3248

RE: SI 13-06-008

Page 2 of 2

Prepared by:

Allen L. Crenshaw

Deputy Chief Investigator

Indictment Unit

Approved by:

Paul Garland

Chief Investigator

OFFICE OF THE DISTRICT ATTORNEY CLAYTON JUDICIAL CIRCUIT



Investigative Summary

S.I. Number 13-06-008

On Friday, December 6, 2013, I sent an email to Colin Slay requesting the following:

- Minutes for the Friends of Clayton County CASA, Inc meetings from July 20, 2011, to such time that Gerald Bostock was terminated from his employment with Clayton County.
- Minutes for the Friends of Clayton County CASA, Inc (Duck Derby Meetings), meetings September, 14, 2011, to such time Gerald Bostock was terminated from his employment with Clayton County.

ID Data:
A. Colin Slay
Chief of Staff
Clayton County Juvenile Court
9163 Tara Boulevard
Jonesboro, Ga. 30236
770-477-3248
colin.slay@co.clayton.ga.us

Prepared by: Allen L. Crenshaw Deputy Chief Investigator Indictment Unit

Approved by: Paul Garland Chief Investigator From:

Anthony Slay </O=CLAYTONCOUNTYGA/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ANTHONY SLAY57B>

To:

Dennis Baker

Sent:

12/4/2013 10:16:34 PM

Subject:

Re: Bostock Investigation

That would be great. Thank you Dennis.

A. Colin Slay Chief of Staff Clayton County Juvenile Court

Clayton County Youth Development & Justice Center 9163 Tara Boulevard Jonesboro, GA 30236 770.477.3248

Empowering the Community | Restoring Families

On Dec 4, 2013, at 5:15 PM, "Dennis Baker" < Dennis Baker@co.clayton.ga.us > wrote:

Colin.

Allen Crenshaw and I meet on Friday to go over the bank records we have received and to see if there is any further investigative processes we need to take. May I can you after that meeting to give you a further update?

Thanks

Dennis

J. Dennis Baker Chief, Special Investigations and Services Office of the District Attorney Clayton Judicial Circuit Harold R. Banke Justice Center 9151 Tara Boulevard 4th Floor Jonesboro, Ga. 30236 770-477-3463 desk

Colin Slay---12/04/2013 05:05:11 PM---Hello Dennis, I was checking to see if there was any update on the investigation. Mr. Bostock has fi

From: Colin Slay/Juvenile Court/Clayton

To: "Dennis Baker" < Dennis.Baker@co.clayton.ga.us>

Date: 12/04/2013 05:05 PM Subject: Bostock Investigation

Hello Dennis,

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 347 of 362

I was checking to see if there was any update on the investigation. Mr. Bostock has filed an EEOC complaint.

Thanks,
A. Colin Slay
Chief of Staff
Clayton County Juvenile Court

Clayton County Youth Development & Justice Center 9163 Tara Boulevard Jonesboro, GA 30236 770.477.3248

Empowering the Community | Restoring Families

From:

Anthony Slay </O=CLAYTONCOUNTYGA/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ANTHONY SLAY57B>

To:

Dennis Johnson

Sent:

12/4/2013 10:00:57 PM

Subject:

Fwd: Bostock Investigation

Dennis, please disregard. This was meant for the DA's office. I apologize.

A. Colin Slay Chief of Staff Clayton County Juvenile Court

Clayton County Youth Development & Justice Center 9163 Tara Boulevard Jonesboro, GA 30236 770,477,3248

Empowering the Community | Restoring Families

Begin forwarded message:

From: "Colin Slay" < Colin.Slay@co.clayton.ga.us > Date: December 4, 2013 at 4:59:37 PM EST

To: "Dennis Johnson" < Dennis Johnson@co.clayton.ga.us>

Subject: Bostock Investigation

Dennis,

I was checking to see if there is any update on the investigation. Mr. Bostock has filed an EEOC complaint. Thanks.

A. Colin Slay Chief of Staff Clayton County Juvenile Court

Clayton County Youth Development & Justice Center 9163 Tara Boulevard Jonesboro, GA 30236 770.477.3248

Empowering the Community | Restoring Families



Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 349 of 362

From:

Colin Slay </O=CLAYTONCOUNTYGA/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ANTHONY SLAY57B>

To:

Steve Teske

Sent: Subject: 6/16/2020 2:31:16 PM

Attachments:

Bostock Internal Audit Report Audit Report, 2013-5.23.pdf



This email originated from inside your organization; however, email links or attachments could still be unsafe – exercise caution. If you are concerned about any email contact the IT Service Desk at x83728.

Judge, the internal audit report you requested is attached.

A. Colin Slay
Director of Juvenile Court Operations
Juvenile Court | Clayton Judicial Circuit

Case 1:16-cv-01460-ELR-WEJ Document 142-4 Filed 03/21/22 Page 350 of 362

From: Colin Slay </O=CLAYTONCOUNTYGA/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=ANTHONY SLAY57B>

To: ~Juvenile Court

Sent: 6/17/2020 7:46:39 PM

Subject: Mr. Bostock's Lawsuit

Good afternoon,

Many of you have likely heard about the US Supreme Court decision involving a suit that former Juvenile Court employee, Gerald Bostock, filed in response to his termination of employment in 2013. While I cannot comment on pending litigation, I would like to share this <u>article from the Atlanta Journal-Constitution</u>; it gives a different side of the story than the narrative that has been widely portrayed in most other media outlets.

Have a good afternoon.

A. Colin Slay
Director of Juvenile Court Operations
Juvenile Court | Clayton Judicial Circuit



CLAYTON COUNTY BOARD OF COMMISSIONERS PERFORMANCE EVALUATION PROGRAM EMPLOYEE RECORD INFORMATION



Name	L. Gerald Bostock				
Employee I.D.#	15711				
ORGN#	220 T 2210				
Department	Juvenile Court				
Job Title	Child Welfare Services Coordinator				
Supervisor	Colin Slay				
Employee Status	Appointed/Unclassified ☐ Classified ☑ Probationary ☐				
Appraisal Period	13 12 1/ y 4/09 – 1/ 1/ 5/10 Appraisal Date 1/5/10				
Appraisal Type	Probationary Annual Other				

Note: Non-exempt employees will only be evaluated on the first ten performance elements. Supervisory/exempt employees will not be evaluated on "Attendance". Attendance for exempt/supervisory employees will be evaluated

under "Rule Conformance".

PERS CR BF 1111-PEP (REV: 08/04/2009)

NR 1/13/11 **RECEIVED**

JAN 0 7 2010

PAGE 1

CLAYTON COUNTY HUMAN RESOURCES DEPARTMENT

NAME: Gerald Bostock (15711)					
PERFORMAN	CE EVALUA	ATION REI	PORT		
Record performance ratings by placing an "X" in	the correspondi	ing box below	. Place th	e numeric equ	ivalent of the
rating into the score box. Total all of the scores.		r			
APPRAISAL ELEMENT 1	2	3	4	5	SCORE
Attendance					N/A
Communication Skills (Written and Oral)				X	5
Decision Making/ Problem Solving				x	5
Interpersonal Relations				X	5
Job Skills/Knowledge				X	5
Productivity/Quantity of Work				Х	5
Public Relations				х	5
Quality of Work				X	5
Rule Conformance				x	5
Safety/Loss Control				x	5
Supervisory/Management Ability			Х		4
	Т	OTAL SCORE			49
30 – 39 Average (3) Average 40 – 49 Above Average (4) Above Average	ctory Performance – cceptable Performance Performance – Meets verage Performance ing Performance	Acceptable Stan	dards table Standa	JAN 072	
	6/30/2010 CASE APPROV F COMMISSIO		нп	CLAYTON CO MAN RESOURCES	DEPARTMENT
I do hereby certify that the "Performance Appraisal Heport"	has been completed	and formally rev	iewed. Da	in thation)
Employee Signature Supervisor Signature Cal: Strat	, , , ,		Da	11	
Department Head Signature	nsmitt		Da	15/11)
(If any signature is missing, complete the "Reason for Reject	ction Form".)			.,	
[D2 DEV: 07/74/2000)					Page 2

NAME: Gerald Bostock (15711)

EXCEPTIONAL PERFORMANCE RECORD/GOAL & OBJECTIVES

List any exceptional skills or performance that attributed to the employee's "above average" rating in the specified element.

		DATE
Attendance		
Communication Skills (Written and Oral)	Mr. Bostock communicates very effectively, both in writing and when speaking. His grant reports are always well written, and he communicates well with his staff as well as with the many outside agencies with whom he interacts.	
Decision Making/ Problem Solving	Mr. Bostock is an outstanding decision maker; he is creative in his responses to problems and handles challenges effectively.	
Interpersonal Relations	Mr. Bostock works well with many persons and units within the court. He is friendly and courteous and has always been willing to help others when needed.	
Job Skills/Knowledge	Mr. Bostock is very knowledgeable about all aspects of the Child Welfare Division and deprivation cases. He serves as a resource to CASA organizations, both at the state and national levels. Mr. Bostock actively seeks and attends training in his field.	
Productivity/ Quantity of Work	Mr. Bostock routinely submits grant and other reports in a timely manner. He is a good planner and rarely has to be reminded of deadlines or assignments. He has been successful in procuring extra resources for his division.	
Public Relations	Mr. Bostock works exceptionally hard to improve the reputation of CASA and the court in the eyes of the community. He has represented both Clayton County and Georgia well, and under his leadership, the annual Duck Derby continues to be a tremendous success.	
Quality of Work	Mr. Bostock's work is of exceptional quality. It is always neat, accurate, and thorough. It rarely contains any errors, and he is able to work largely without supervision.	
Rule Conformance	Mr. Bostock knows and follows departmental rules, procedures, and policies. He is also careful to ensure that the CASA program adheres to state and national standards.	
Safety/Loss Control	Mr. Bostock has not has any accidents or capital losses during this or any previous rating periods. He promptly reports any safety concerns.	
Supervisory/ Management Ability	Mr. Bostock acts as a leader both in his division and within the court as a whole. He has effectively implemented new procedures for his division during the rating period and has promoted a more productive work environment with higher employee morale.	

REMARKS:

Mr. Bostock continues to be an asset to the Juvenile Court and Clayton County. His hard work has made Clayton County CASA a model program. He has effectively sought grants and other resources and continues to work hard on promoting an efficient and effective division. Furthermore, under his leadership, CASA's services have expanded and the Duck Derby was success in spite of the down economy.

[P3 REV:08/04/2009] Page 3

Gerald Bostock

Self-Evaluation Attachment 01/04/10

Communication Skills-

- VOCA (Victims of Crime Act) Grant quarterly statistical reports submitted timely and accurately
- VOCA Grant quarterly expenditure reports submitted timely and accurately
- VOCA Grant semi annual and annual report submitted timely and accurately
- PSSF (Promoting Safe and Stable Families) monthly invoices submitted timely and accurately
- · GA CASA quarterly statistical reports submitted timely and accurately
- National CASA monthly invoices submitted timely and accurately
- National CASA semi-annual and annual report submitted timely and accurately
- Annual and quarterly National CASA OJJDP surveys submitted timely and accurately
- National CASA monthly expense report submitted timely and accurately
- National CASA Jewelers For CASA monthly invoices submitted timely and accurately
- National CASA Jewelers For CASA semi-annual and annual reports submitted timely and accurately
- Monthly communication with staff, advisory board, and court administration regarding CASA program activity
- Effectively communicates with court staff and social service agencies
- Represents program and the Court on the Child Fatality Review Committee, Child Abuse Protocol Committee, Clayton County Coalition Against Violence Committee, Grandparents Raising Grandchildren Initiative for Clayton County, Clayton County Deprivation Protocol Committee, Court Improvement Initiative (Model Courts Project), Metro CASA Collaborative, and County visitation project

Decision Making/Problem Solving-

- Able to work independently to manage CASA and Panel
- Thinks "outside of the box" to be creative and resourceful during difficult budget times
- Secured donated computer (from Ga CASA) due to participation in Ga CASA's COMET database overhaul
- Comfortable seeking supervisory assistance when necessary
- Addresses departmental challenges or issues when necessary

Interpersonal Relations-

- Able to effectively relate with all aspects of the Juvenile Court system as well as Superior Court and Probate Court
- Continued the expansion of GAL services to Superior Court
- Expanded CASA role as GAL in all deprivation hearings in Juvenile Court
- Worked to effectively mesh CASA program and Citizen Review Panel into Child Welfare Unit during this review period
- Friendly and courteous

- Assisted Ga CASA with program reviews and site visits during this review period
- Provided on-going support to the Metro CASA Collaborative for training, strategic plan development
- Board development assistance provided to Gwinnett CASA and Cobb County CASA during this review period
- Programmatic assistance provided to Fulton County CASA during this review period

Job Skills/Knowledge-

- Knowledgeable about child welfare issues
- Remains current on political aspects that effect the child welfare system
- Participates annually with CASA Day at the Capitol, and served on the 2009 Planning committee
- Willing to learn and take on new responsibilities (i.e. GAL expansion in Superior Court and CASA as GAL in Juvenile Court)
- Completed Management Development training through Clayton Co Personnel during this review period
- Attended National CASA Conference, GA CASA State Conference, and the Child Placement Conference (secured scholarship)
- Secured funding for staff to attend variety of trainings throughout this review period
- Attended mandatory COPs (Council of Programs meetings held by Ga CASA)

Productivity/Quantity of Work-

- · As noted under Communication Skills, submits reports timely and accurately
- Reviews caseload activity monthly
- Involved with program and caseload functions and projects

Office Depot Backpack program- secured 1000 backpacks National Volunteer Week Recognition April 19 – April 25 Duck Derby

Christmas Toy Drive: 125 children benefited

Quarterly Class Reunion functions for volunteers

Quarterly training sessions- 53 new volunteers during this review period

Ambassadors Behind CASA (ABCs)

Total # of children served: over 794 served (770 last year)

Again served more children than any other CASA program in the state Serving 91% of children in Clayton County DFCS custody compared to Cobb @ 39%, Dekalb 13%, Fulton @ 25%, and Gwinnett @ 16% Ga CASA annual Fashion Show and Luncheon Fundraiser (model)

Public Relations-

 Works diligently to promote and educate the community about the role and mission of CASA, to include speaking engagements, annual Duck Derby events, and booths at community functions: Clayton State, Soup and Quacker, Counting of the Flock, VID, and Duck-O-Ration, Chamber events

Gerali Bostock

- Effectively seeks community resources to benefit the program and the Court, and the children we serve: secured new sponsors including Hewitt and working on AMLI Residential
- Serves as the staff liaison to the Friends of Clayton County CASA Advisory Board
- Maintains the Advisory Board office (only CASA advisory board office in GA)
- Involved in Board recruitment to move the Board from 12 seats to 16
- Assists in the planning and staging of the program's annual fundraiser, which
 entails 8 months of committee and subcommittee work, and involves all facets of
 our community. Raised 45K in sponsorships, ticket sales, and prize donations.
- Has helped strengthened program relationships with social services agencies, private sector businesses, and other local CASA programs

Quality of Work-

- As noted above, submits and completes reports in a timely and accurate manner
- Completes assignments on a timely basis, and eagerly accepts new tasks and challenges
- Continued to strengthen program to serve 91% of children in foster care
- Maintained volunteer pool of 200
- Utilizes internships and externships each semester to benefit the program and the Court as well as expanding educational experiences for the students
- Completed mandatory National CASA 4 Year Review Assessment- results will be submitted to court administration

Rule Conformance-

- Follows Clayton County Employee Policy and Procedures and seeks explanation and/or clarification as necessary
- Adheres to local, state, and national program protocol

Safety/Loss Control-

- There are no incidents of accident or injury
- Promptly notifies Court Administration when there are safety concerns

Supervisory/Management Ability-

- · Strives to improve quality of services provided by the CASA program
- Sets high standards for self and staff since we advocate for child victims
- Does not ask staff to do something I'm not willing to do myself
- Continues to upgrade and support staff resources (i.e. computer equipment/training opportunities
- Child Welfare Policy and Procedure rewrite during this review period

NAME:	Gerald Bostock, Emp.#	015711						
	• • • • • • • • • • • • • • • • • • • •	RMANCE						
	ance ratings by placing a		correspond	ing box belo	ow. Place t	the numeri	c equivalent of the	
rating into the so	core box. Total all of the	scores.						
APPRAISAL ELI	EMENT	1	2	3	4	5	SCORE	
Attendance							N/A	
Communication S (Written and Oral						X	5	
Decision Making/ Problem Solving					X		4	
Interpersonal Rela	ations				X		4	
Job Skills/Knowle	edge					X	5	
Productivity/Quar	ntity of Work					X	5	
Public Relations						х	5	-
Quality of Work						X	5	
Rule Conformance	ee					X	5	
Safety/Loss Contr	rol					Х	5	
Supervisory/Man	agement Ability			X			3	
			T	OTAL SCOR	RE		46	
TOTAL SCORES 10 – 19 Unsatisf 20 – 29 Below A 30 – 39 Average 40 – 49 Above A 50 Outstand	actory (1) Average (2) (3) Average (4)	INGS Unsatisfactory P Below Acceptab Average Perform Above Average Outstanding Per	ole Performance nance – Meets Performance -	e - Needs Imp Acceptable St	rovement tandards	ards	RECEIVE JAN 07201	
	NO	FYE 06/30/2 INCREASE ARD OF CO	APPROV				CLAYIUN COU HUMAN RESOURCES DEP	NTY
Employee Signatur Supervisor Signatur Department Head S	re	Mon	NO		D:	ate ate	//////////////////////////////////////	
					ITIFF'S	cker.cc		

CLAYTON_001782

NAME: Gerald Bostock, Emp.# 015711

EXCEPTIONAL PERFORMANCE RECORD/GOAL & OBJECTIVES

List any exceptional skills or performance that attributed to the employee's "above average" rating in the specified element.

		DATE
Attendance		
Communication Skills (Written and Oral)	Mr. Bostock is a very effective communicator. He writes well and excels at communicating with staff, partnering agencies, and community volunteers.	
Decision Making/ Problem Solving	Mr. Bostock makes clear-cut decisions in a timely manner and usually foresees potential problems.	
Interpersonal Relations	Mr. Bostock is courteous with most staff and is willing to help his peers. He presents a professional image.	
Job Skills/Knowledge	Mr. Bostock is a resource person when it comes to child welfare issues. He demonstrates knowledge about all job-related topics and is quick to observe and recall details.	
Productivity/ Quantity of Work	Mr. Bostock completes assignments in advance, uses resources efficiently and shows enthusiasm about the work of the Child Welfare Division, often working on weekends and in the evenings. He is an exceptional planner.	
Public Relations	Mr. Bostock represents the Court well, often receiving compliments from our partners in the community, volunteers, and other professional organizations. This is remarkable considering that CASA is one of the most visible elements of the Court.	
Quality of Work	Mistakes in Mr. Bostock's work are rare, and he is able to work without undue oversight.	
Rule Conformance	Mr. Bostock knows and follows departmental rules and procedures, and he rarely has to be reminded of them. His attendance was good during the rating period.	
Safety/Loss Control	Mr. Bostock knows and follows all safety protocols. He is quick to report accidents and safety issues involving his staff, and he has not had any accidents during this or the previous rating period.	
Supervisory/ Management Ability		

REMARKS:

Mr. Bostock continues to be an asset to this Court, especially as it relates to his work involving the Child Welfare Division. Under his leadership, CASA has reached new performance milestones, including providing CASAs to 100% of the deprived children before the Court, a feat not matched by any other program in the state. Also, under Mr. Bostock's direction, the Annual Darlin' Duck Derby, the main fund-raiser for the CASA program, enjoyed record donations this year, despite a down economy.

[P3 REV:08/04/2009]

Page 3



HUMAN RESOURCES DEPARTMENT

NAME:	Gerald Bostock, Emp.# 015711

PERFORMANCE IMPROVEMENT GOALS & OBJECTIVES

List any goals and/or objectives that may assist the employee to improve upon specific elements and over-all performance. Following the specified period, the supervisor should review the employee's progress.

	the supervisor should review the employee's progress.	DATE
Attendance		
Communication Skills (Written and Oral)		
Decision Making/ Problem Solving		
Interpersonal Relations		
Job Skills/Knowledge		
Productivity/ Quantity of Work		
Public Relations		
Quality of Work		
Rule Conformance		
Safety/Loss Control		
Supervisory/ Management Ability	Mr. Bostock has experienced some significant leadership challenges among his staff this year, but to his credit, he has accepted the coaching and intervention imposed by the administration with poise and grace and has demonstrated a willingness to work on the issues.	

REMARKS:

Mr. Bostock should continue to work on building trust among his staff, being careful to administer fair and equal treatment of staff, and to contribute to an environment that promotes harmony, employee development, teamwork, and productivity.

[P4 REV:08/04/2009]

JAN 07 2011

CLAYTON COUNTY
HUMAN RESOURCES DEPARTMENT

	1. 700-0	R 25-12-6	
NAME:	GURAND	DOSTAL	15711
111111111111111111111111111111111111111			11/

EMPLOYEE SELF-EVALUATION

Employee should use the Performance Evento complete the following sections. It performance for the specific element the right. Total all of the scores. box and complete the information at the second section is the second section.	Place ar and wri Place	n "X" in te the the tot	the box numerica	most rep	oresenta	tive of your
APPRAISAL ELEMENT	1	2	3	4	5	SCORE
Attendance						
Communication Skills (Written & Oral)						
Decision Making/ Problem Solving						
Interpersonal Relations						
Job Skills/Knowledge						
Productivity/Quantity of Work						
Public Relations						
Quality of Work						
Rule Conformance						
Safety/Loss Control						
Supervisory/Management Ability						
		T	OTAL SCO	RE		
(1) Unsatisfactory Performance - Im (2) Below Acceptable Performance - (3) Average Performance - Meets Acc (4) Above Average Performance - Exc (5) Outstanding Performance GOALS TO IMPROVE PERFORMANCE:	Needs I eptable eeds Ac	mproveme Standan ceptable	ent rds e Standa	rds		_
- Continue monthly stated - have more thorough per	C mtq Ferma	rs nce P	will	5 W/	5-1-64	
AREAS OF EXCEPTIONAL PERFORMANCE:						
see attache	I			REC	CEIVE	D

Self-Evaluation Attachment 12/17/10

Communication Skills-

- Grant applications and reporting requirements submitted timely throughout this
 annual review period. Grants include VOCA, PSSF, ARRA, and Ga CASA.
 Also assisted with the Club of Heart and AMS Children Charities grants
 sponsored by the Friends of Clayton County CASA, Inc. advisory board.
- Monthly communication with staff, advisory board, and court administration was made regarding CASA program activity.
- I effectively communicate with court staff and social service agencies.
- During this annual review period, I represented the program and the Court on the Child Fatality Review Committee, Child Abuse Protocol Committee, Clayton County Coalition Against Violence Committee, Grandparents Raising Grandchildren Initiative for Clayton County, Clayton County Deprivation Protocol Committee, Court Improvement Initiative (Model Courts Project), Metro CASA Collaborative, and the County visitation project.
- I am comfortable with public speaking responsibilities which include meetings with our advisory board, H.U.G.S., DFCS, ABCs, GA CASA Luncheon and Fashion Show, COPS, GA CASA, Metro Collabroative, City of Morrow and Judges meetings. Additionally, communication during events throughout the review period including Swearing In ceremonies, volunteer reunions and receptions, Clayton CAN Expo, SummerFest, board retreat, Ga CASA annual Luncheon and Fashion Show, Ga CASA Tennis Tournament and Girls Night Out, CASA Day at the Capitol, Soup and Quackers, Fall Festival, Southlake Mall, VID, Counting of the Flock, annual Darlin' Duck Derby, and ABC Spaghetti Lunch and toy drive (including presentations at Hewitt & Associates and Ga Power.
- Effectively communicated with city officials in Morrow to move program's annual fundraising event to the city of Morrow (Olde Towne Morrow)

Decision Making/Problem Solving-

- I am able to work independently to manage CASA and Panel programs but feel comfortable seeking assistance from supervisor when necessary.
- I try to think "outside of the box" to be creative and resourceful during difficult budget times so that the program continues to thrive and grow.
- I secured a donated printer from Ga CASA during this review period, and negotiated a 12 month agreement through Ga & National CASA for funds to cover our conversion from COMET to ETO.

Interpersonal Relations-

- I believe I am able to effectively relate with all aspects of the Juvenile Court system as well as Superior Court and Probate Court. I also have maintained a strong relationship with our advisory board, GA CASA, the Metro Collaborative, and National CASA.
- I believe I am friendly and courteous, again as evidenced by strong interpersonal relationships.

 RECEIVED

JAN 072011 CLAYTON 001786 CLAYTON COUNTY HUMAN RESOURCES DEPARTMENT

- During this review period, I have provided on-going support to the Metro CASA Collaborative for training, strategic plan development, and event planning.
- We are respected by National CASA and Ga CASA as a leading CASA program in the state and region.
- I am respected by social service agencies and work closely with DFCS administration on an on-going basis to maintain our working relationship.
- I am respected by advisory board members and program sponsors.

Job Skills/Knowledge-

- I am knowledgeable about child welfare issues and remain current on political aspects that effect the child welfare system.
- I am willing to learn and take on new responsibilities. During this review period, I facilitated the transition of 3 Year Reviews from Intake to Child Welfare.
- I Attended conferences and trainings to further my knowledge and skill set during this review period, and have secured funding for staff to attend variety of trainings throughout this review period as well.
- I have continued to serve as a COPs (Council of Programs) representative and GA CASA board member during this review period (term will expire in Spring).

Productivity/Quantity of Work-

- As noted under Communication Skills, I have ensured that reports are submitted timely and accurately.
- I reviewed caseload activity monthly and provided accurate statistical data to staff, court administration, and advisory board on a monthly basis.
- I participated in nearly 100% of program and caseload functions and projects throughout this review period, more than any staff member, advisory board member, or volunteer.

Public Relations-

- I work diligently to promote and educate the community about the role and mission of CASA, to include speaking engagements, annual Duck Derby events, and booths at community functions.
- I effectively sought community resources to benefit the program and the Court, and the children we serve. Examples during this review period include AMLI Residential, Office Depot, Hudson Family Foundation, Hewitt and Associates, Club of Hearts/GA Power, and AMS Children Charities (these are all non duck derby related)
- I continued to maintain the advisory board office (only CASA advisory board office in GA) during this review period- at no cost to the county.
- I have been involved in Board recruitment to move the Board from 12 seats to 21
- I assisted in the planning and staging of the program's annual fundraiser, which
 entails 8 months of committee and subcommittee work, and involves all facets of
 our community—worked diligently with city officials in Morrow to move the
 event to Olde Towne Morrow. I attended all duck derby events during this
 review period.

HUMAN RESOURCES DEPARTMENT