

1 IN THE UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF TENNESSEE
3 AT CHATTANOOGA

4 -----
4 THOMAS WILLIAM MORGAN,)
)
5 Plaintiff,)
) 1:24-cv-00303
6 vs.)
)
7 MARION COUNTY GOVERNMENT,)
)
8 LINDA MASON, RONNIE "BO")
)
8 BURNETT, and DALE WINTERS,)
)
9 Defendants.)
9 -----

10 Chattanooga, Tennessee
11 September 15, 2025

12 DEPOSITION OF DEPUTY DALE WINTERS

13 -----
13 APPEARANCES:

14 FOR THE PLAINTIFF:

15 ROBIN R. FLORES, ESQ.
16 Attorney at Law
16 4110-A Brainerd Rd
17 Chattanooga, TN 37411
17 (423) 267-1575
18 robin@robinfloreslaw.com

19 FOR THE DEFENDANT:

20 B. THOMAS HICKEY, JR., ESQ.
21 Spicer Rudstrom PLLC
21 537 Market St., Su 203
22 Chattanooga, TN 37402
22 (423) 756-0262
23 thickey@spicerfirm.com

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

DEPUTY DALE WINTERS:
Examination by Mr. Flores 5

INDEX TO EXHIBITS

No.	Description	Page
9	Defendant Dale Winters' Answers to Plaintiff's Interrogatories and Requests for Production	3
10	January 29, 2024 county commission meeting minutes	34
11	January 22, 2024 county commission meeting agenda	35
12	Videotape	44
13	Defendant's Rule 26(A)(1) Initial Disclosures	75

- - -

1 D I S C L O S U R E
2 STATE OF TENNESSEE
3 COUNTY OF HAMILTON
4 DEPONENT: DEPUTY DALE WINTERS

5 Pursuant to the Rules and Regulations of the Tennessee
6 Board of Court Reporting, I make the following
7 disclosure:

8 I am a Tennessee Licensed Court Reporter. I am here
9 as an independent contractor for Wilson Reporting
10 Agency.

11 Wilson Reporting Agency was contacted to provide court
12 reporting services for this deposition. Wilson Reporting
13 Agency will not be taking this deposition under any
14 contract that is prohibited by TCA 24-9-136.

15 Wilson Reporting Agency has no contract/agreement to
16 provide reporting services with any party to the case,
17 any counsel in the case, or any reporter or reporting
18 agency from whom a referral might have been made to cover
19 this deposition.

20 Wilson Reporting Agency will charge its usual and
21 customary rates to all parties in the case, and a
22 financial discount will not be given to any party to this
23 litigation.

24 Sheila D. Wilson, LCR#268
25 Expiration date: June 30, 2026

1 The deposition of DEPUTY DALE WINTERS, taken on
2 the 15th of September 2025, on behalf of the Plaintiff,
3 beginning at approximately 9:04 a.m., in the offices of
4 Spicer Rudstrom PLLC, 537 Market St., Su 203,
5 Chattanooga, Tennessee, before Sheila D. Wilson, Licensed
6 Court Reporter #268, and Notary Public.

7 This deposition is taken pursuant to the terms and
8 provisions of the Federal Rules of Civil Procedure.

9 Signature of the witness not discussed.

10 / / /

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 DEPUTY DALE WINTERS,
2 called as a witness at the instance of the Plaintiff,
3 having been first placed under oath, was examined and
4 testified as follows:

5 EXAMINATION

6 BY MR. FLORES:

7 Q Good morning, Deputy. Sorry I was late. Normally
8 I'd get here a few minutes early and set it up. So, if
9 you would just bear with me just one more minute I'll try
10 and get you back to work.

11 Let me start off first with just some general
12 questions. Have you given a deposition in the past?

13 A No.

14 Q Before we get into the more formal questions
15 today, today is just a -- I'm Robin Flores. I represent
16 the plaintiff. You and I have never met, have we?

17 A No.

18 Q You said something about National Guard. You
19 served with the 1st, 181st?

20 A I've served in 181st, B Battery.

21 Q When?

22 A I got out in 2000.

23 Q So you and I served there at the same time.

24 A That's what I was thinking. That's what I was
25 thinking. I went -- I was in A Battery, 1st, 115th.

1 Q Yeah. Over in --

2 A In South Pittsburg.

3 Q Oh, South Pittsburg?

4 A They delinquished [sic] that and we got the choice
5 to go to Winchester or come to Chattanooga, and I came to
6 Chattanooga. Closer to flagpole. You know how that
7 goes.

8 Q I was a BCs driver for B Battery, headquarters for
9 brigade, and then armory for most of the time. So I
10 thought -- you looked familiar once I saw you.

11 Okay. Let's do all the formal stuff. Go ahead
12 and state your full name, if you would, please.

13 A Christopher Dale Winters.

14 Q And your current position?

15 A I am employed by the Marion County Sheriff's
16 Department, being an SRO, school resource officer at
17 Marion County High School, class deputy.

18 Q Have you ever given a deposition in the past?

19 A No.

20 Q So, today, even though it may -- you know, it's
21 pretty -- fairly informal. We don't have a judge to
22 listen to objections. Those will be ruled upon -- if
23 there are objections from Mr. Hickey, those will be ruled
24 upon at a later time. So if he does object to something
25 I ask of you, he'll go ahead and state his objection on

1 the record, and then you go ahead and continue to answer
2 the question as posed.

3 A Yes.

4 Q You can't stop and say, hey, look, I want to
5 consult with my attorney prior to answering a question.
6 If Mr. Hickey thinks I'm asking something improper, that
7 is privileged or whatever, he'll take whatever steps are
8 necessary to do what he needs to do.

9 It's not a marathon session that we're going to be
10 at today. I don't anticipate being here, you know, more
11 than two or three hours at most. But if you need to take
12 a break, please, by all means, no matter how many times,
13 go ahead and stop me, because I'll do the same thing.

14 The court reporter takes down the written word --
15 I mean takes down spoken word and puts it down in
16 writing. So, verbal, you know, in regular discourse --

17 A I gotcha. Yes, sir.

18 Q Try to verbalize if, you know, if it's yes or
19 no --

20 A Gotcha.

21 Q -- all the way.

22 I'll have some documents to show you. You don't
23 have to answer -- look at them real quick and then try to
24 answer. Take as much time as you need to look at
25 whatever documents I have. I've only got two sets to

1 show you today.

2 A Yes, sir.

3 Q Most of what I'm going to show you is on video. I
4 think that about covers it.

5 THE REPORTER: Don't talk over each other.

6 Q Yeah. I knew there was something else.

7 And also on discourse, you know, regular
8 conversation between folks, we sometimes want to answer
9 each other's questions. We think the answer is done.
10 Let me finish up before you answer. And you take as long
11 as you need to answer the question.

12 A Yes, sir.

13 Q And I'm going to turn this phone off.

14 And do you feel comfortable today? Are you sick
15 or anything, anything that would prevent you from
16 responding?

17 A I feel good.

18 Q All right. You've told me your full name and
19 current position with the Marion County Sheriff's Office.
20 How long have you worked there?

21 A At Marion County? I've been there 11 years.

22 Q And prior to that how long have you been there?

23 A Prior to that?

24 Q I mean been in law enforcement.

25 A I've been in law enforcement 33 years.

1 Q Oh, really?

2 MR. FLORES: I want to go ahead and premark
3 what's titled Defendant Dale Winters' Answers to
4 Plaintiff's Interrogatories and Request for Production as
5 your exhibit to your testimony today.

6 ([Exhibit 9](#) was marked.)

7 Q And that's for you to look at.

8 A Thank you.

9 Q And looking at [Exhibit 9](#), if you could take a look
10 at the -- it's going to be -- well, it's not numbered,
11 but before you get to those last -- to this part that
12 says request for production. Those are the last three
13 pages. So it would be the fourth to the last.

14 If you could just eyeball that. And then, you
15 know, look at the whole document, but does this page on
16 [Exhibit 9](#) that looks like -- it bears a signature and a
17 seal of a notary public, is that your signature or at
18 least a correct copy of it?

19 A That's my signature.

20 Q Okay. And if you could take a look at the whole
21 document. When you're done looking at it, I was going to
22 ask you if you recognize the document --

23 A Yes, sir.

24 Q -- and you have no doubt that this is your
25 response to the discovery we sent out.

1 A Yes, sir. (Reviewing document.)

2 Q I'm going to be referring to interrogatory number
3 3. It's going to be on the second page. I think you're
4 looking at it. And I have noted that there was an
5 objection, but without waiving the objection you're
6 answering the particular question I'm going to ask you
7 now.

8 On January 22, 2024, what role were you serving at
9 the commission meeting?

10 A I was a citizen.

11 Q So are you telling me that you were a citizen but
12 you were still holding the office of deputy sheriff at
13 the same time, correct?

14 A Correct.

15 MR. HICKEY: Object to form.

16 Q And while you were there as a citizen, if there
17 was a criminal act or somebody, like Linda Mason did --
18 and we'll get to more of that in a minute -- asked you to
19 enforce the law, or you saw a crime being committed, you
20 would've had some type of duty to intervene or act as a
21 deputy sheriff, wouldn't you?

22 MR. HICKEY: Object to the form.

23 Q And you can go ahead and answer.

24 A Correct.

25 Q So that's yes?

1 A Yes.

2 Q And if you can, can you describe your role and
3 responsibilities as a deputy sheriff of Marion County at
4 the time of January 22, 2024?

5 A In the capacity of being at that meeting, I was a
6 citizen at the time.

7 MR. HICKEY: I don't think he's talking about
8 the meeting. I think he's asking your duties on January
9 22, 2024, what you do as a sheriff's deputy.

10 MR. FLORES: Yes.

11 MR. HICKEY: It wasn't limited to the
12 meeting.

13 MR. FLORES: Yeah.

14 A Okay. My role was a school resource
15 officer/deputy. When school's not in session, of course,
16 I hit the road and serve papers and all stuff like that.

17 Q Okay. And you're POST certified, obviously.

18 A Yes.

19 Q And when you were -- when did you get POST
20 certified?

21 A Alabama, I was POST certified in '94. And then I
22 came to Tennessee and they submitted all my records to
23 POST in Nashville, and I challenged the test at that time
24 and become POST certified in Tennessee around 2001, 2002.

25 Q And for the reader of this deposition, can you

1 tell us -- I mean, POST is an acronym, is it not?

2 A Uh-huh. Yes, sir.

3 Q And that means Police Officer Standards and
4 Training?

5 A Commission.

6 Q Okay. And that's similar in Alabama, that same
7 term is similar in Alabama?

8 A Yes.

9 Q And when you were in Alabama, what police agencies
10 did you work for?

11 A I worked for Stevenson, Alabama, Police
12 Department, the city.

13 Q And what were your periods of employment there?

14 A Pardon?

15 Q What were your periods of employment at Stevenson?

16 A I started out in '92 as a dispatcher there in
17 Stevenson, and then I moved up to patrol.

18 Q And what year did you go to patrol?

19 A '95.

20 Q Okay. You were POST certified -- maybe I
21 misunderstood you. You were POST certified in 1994?

22 A '94. Yes, '94.

23 Q But you didn't get a badge and gun and have --

24 A Once I got out of -- well, I got a badge and gun
25 prior to going to the academy. And then POST

1 certification was in '94, yes, sir. I'm sorry.

2 Q And does Alabama have a central academy or is
3 it -- are there academies operated by separate police
4 departments that you attended?

5 A I went to Montgomery. Montgomery, Alabama.

6 Q Is that the central?

7 A There's several down there. You've got, you
8 know -- but that's where I went.

9 Q And just so I have a better grasp of this, and I
10 go back to my police career. Back in the '80s South
11 Carolina, I think it's still that way today, had one
12 central academy everybody had to go, whether it was
13 highway patrol or a little two many police department.
14 Was Alabama that way?

15 A I have no idea.

16 Q Okay. And you said you challenged the POST
17 certification in Tennessee?

18 A Yes.

19 Q When you say "challenged," for the reader of the
20 deposition what does that mean?

21 A Once the paperwork is submitted -- because I left
22 Alabama and come to South Pittsburg, Tennessee. And
23 being noncertified in Tennessee, they sent all my stuff
24 in from Alabama to the POST in Nashville, at TLETA,
25 Tennessee Law Enforcement Training Academy. And they

1 reviewed it, and with all my schooling that I had in
2 Alabama they said, you're eligible to take the challenge
3 test in lieu of going through the academy.

4 Q And so you took the test?

5 A Yes.

6 Q Okay. And that was -- what agency did you hire in
7 with in 2002 to get --

8 A City of South Pittsburg.

9 Q So, bouncing back to Stevenson, Alabama, is it
10 fair to say you were patrol officer from 1995 to 2002?

11 A Yes.

12 Q All right. When you went through the academy in
13 Stevenson, Alabama, did you receive any training specific
14 to constitutional rights of citizens -- or people in the
15 United States?

16 A Yes, I did.

17 Q And did you receive any training regarding the
18 rights of people to free speech, just in general free
19 speech under the First Amendment?

20 A Yes.

21 Q What is your understanding of free speech as it
22 applies to the First Amendment to the United States
23 Constitution?

24 A The First Amendment to the Constitution of the
25 United States, basically sums up that you've got the

1 right to speak openly pertaining -- as long as it don't
2 get out of hand. You've got the right to speak. You've
3 got the right to assemble, as long as it don't get out of
4 hand.

5 Q Because that would be my next question, about
6 assembly. What is your understanding of the right of
7 freedom of assembly under the First Amendment to the
8 United States Constitution?

9 A Yes.

10 Q What is your understanding of that?

11 A You've got the right to assemble in a group, if
12 you're the spokesperson -- to get your message out,
13 what's happening, what's going on, without any derogatory
14 statements or outburst.

15 Q Okay. Do you understand -- did you receive any
16 training at the academy in Alabama, about prior
17 restraints on speech and freedom of assembly?

18 A Could you repeat that?

19 Q There's a concept known as prior restraint. And
20 that applies to government putting restrictions on
21 freedom of speech and freedom of right of assembly. Did
22 you receive any training at the academy in Stevenson --
23 in Alabama regarding prior restraints on freedom of
24 speech and freedom of right to assemble?

25 A So you're talking -- I'm sure they touched on it,

1 but that's been a long time.

2 Q Long time ago?

3 A Yes.

4 Q Okay. When you were in Alabama, working at
5 Stevenson, I'm going to assume -- because you didn't
6 mention any other agency, Stevenson, Alabama was the only
7 agency you worked for in that state?

8 A In Alabama, yes.

9 Q When you were in Stevenson did you go through any
10 kind of continuing training updates on a yearly basis?

11 A Continued education?

12 Q Yes.

13 A Yes.

14 Q Okay. And during your continuing education in
15 Alabama, with Stevenson, Alabama PD, did you receive
16 training on the rights of citizens, or people in the US,
17 for the freedom of speech and the freedom of assembly?

18 A I'm sure we did, but I couldn't recall. But we
19 done a lot of training throughout the county of Jackson.

20 Q Okay. Stevenson, Alabama is in Jackson County?

21 A Yes, sir.

22 Q Did not know that.

23 When you were working in Stevenson, Alabama, did
24 you ever attend city or county commission meetings?

25 A No, sir.

1 Q When you came to -- when you took your test to get
2 POST certified in Tennessee in 2002, were there any
3 questions on the test that you took that addressed
4 freedom of speech and freedom of right of assembly?

5 A I can't recall.

6 Q So when you say you can't recall, is it possible
7 you might have, there might've been some kind of
8 questions?

9 A It could've been.

10 Q Okay. But you just don't recall now?

11 A I just can't recall.

12 Q And how long were you in South Pittsburg,
13 Tennessee?

14 A I was there approximately -- maybe four years.

15 Q So that would've been from ninety -- from what
16 year to what year?

17 A I really couldn't tell you.

18 Q Would it be fair to say that you started in 2002?

19 A Close to it, yes.

20 Q Was there a period of unemployment between
21 Stevenson, Alabama and South Pittsburg, Tennessee?

22 A There wasn't -- no, because I left Stevenson,
23 Alabama and come straight to South Pittsburg.

24 Q What was the reason that you left Stevenson,
25 Alabama?

1 A I was living in Tennessee and I wanted to come
2 back home.

3 Q How were you able to -- were you living in
4 Tennessee when you were working in Stevenson?

5 A Yes.

6 Q Curiosity more than anything else, how were you
7 able to do that if you weren't a resident of the state of
8 Alabama?

9 A At that time I just -- they accepted it.

10 Q Okay. So you gave Alabama -- when you applied to
11 Stevenson, Alabama, you were living in Tennessee?

12 A Yes.

13 Q And you put in your application to Alabama that
14 your residence was in Tennessee?

15 A Yes.

16 Q Okay. And were you living in South Pittsburg at
17 the time?

18 A I was.

19 Q And do you -- I don't need to know the street
20 address, but do you reside in South Pittsburg to this
21 day?

22 A Then?

23 Q To this day.

24 A No.

25 Q Do you live in the city?

1 A I live in Kimball.

2 Q Kimball. All right. So, when you came to South
3 Pittsburg, took the exam, while -- when did you go to
4 your present -- I'm asking the wrong question.

5 How many police agencies have you been employed by
6 while you were working in -- living in Tennessee?

7 A South Pittsburg --

8 Q Or working in Tennessee. I'm sorry.

9 A I left Stevenson, Alabama, come to South
10 Pittsburg, Tennessee.

11 Q All right.

12 A Went to work at South Pittsburg Police Department
13 as patrolman.

14 Q Okay.

15 A Left South Pittsburg as a patrolman and went to
16 Kimball, Tennessee, and worked there for a while, three,
17 four years maybe, and then they come to me and wanted me
18 to take the job at South Pittsburg as chief of police.

19 Q Okay. So you went back --

20 A I went back to South Pittsburg as chief of police
21 and was there for seven years, I believe, six or seven
22 years as chief of police of that town.

23 Q So if we could work on a timeline, if you don't
24 mind. South Pittsburg, you started in '02 and you went
25 to Kimball. What was the year that you left South

1 Pittsburg and went to Kimball?

2 A I didn't lose no -- I didn't have a break.

3 Q Okay. So when did you leave South Pittsburg to go
4 to Kimball?

5 A I can't recall. It's been a while.

6 Q You would've had to change or notify the POST
7 commission each time you moved, correct?

8 A I wouldn't.

9 Q The agency would?

10 A The agency would've.

11 Q Okay. And you said you were at Kimball for how
12 many years again?

13 A Maybe four or five years, something like that.
14 And then went back to South Pittsburg as chief.

15 Q And what were the time frames, if you can recall,
16 that you were chief at South Pittsburg PD?

17 A I was there for seven years.

18 Q So what year to what year, approximately?

19 A Well, I've been at Marion County Sheriff's
20 Department 11. So, I left there and come straight to
21 Marion County Sheriff's Department.

22 Q So 11 years, we're going back, what, 2014,
23 approximately?

24 A Right in there.

25 Q And why did you leave Kimball PD? To take the job

1 as chief?

2 A Yes, sir.

3 Q And South Pittsburg, why did you leave the chief's
4 position to be a deputy at Marion County?

5 A At that time at South Pittsburg there was a lot of
6 politics going on, and it was -- at that time it was
7 better for me to leave and move on, and I did.

8 Q I've had some litigation with South Pittsburg
9 during those years, and there was some turmoil within the
10 department. Were you ever disciplined by your superiors
11 while you were chief at South Pittsburg PD?

12 A No. No, sir.

13 Q Were you asked to resign?

14 A No, sir.

15 Q So it was a voluntarily quit --

16 A Yes.

17 Q -- to take another job?

18 A Yes.

19 Q And during your time to the present day, while in
20 Tennessee on your continuing legal education, have you
21 received training or refreshers on First Amendment rights
22 of persons in the U.S. and Fourth Amendment rights of
23 persons?

24 A I have.

25 Q From your training and the refresher courses, did

1 you have updates as to -- let me back up.

2 Did you have any training -- excuse me. Did you
3 have any training on -- or updates on prior restraints on
4 speech and freedom of assembly?

5 A We had it covered in our inservice, yes.

6 Q And that's for each agency, South Pittsburg,
7 Kimball, and Marion County --

8 A Yes.

9 Q -- at the sheriff's office?

10 A Yes.

11 Q Now, you were trained in the academy in Alabama on
12 Fourth Amendment issues, Fourth Amendment to the
13 Constitution of the United States?

14 A Yes.

15 Q What is your understanding of what the Fourth
16 Amendment stands for or what protections does it give?

17 A The Fourth Amendment is search and seizure.
18 You've got to see a crime committed or -- and then you've
19 got the right to protect those others if there's a crime
20 committed and you've got to do what you've got to do.

21 Q Did you receive training on the Fourth Amendment
22 on the clauses dealing with unreasonable searches and
23 seizures?

24 A We did.

25 Q And what does that mean to you as we sit here

1 today? What is unreasonable search and seizure?

2 A Unreasonable -- I just can't go up and take
3 physical control of someone. I cannot go up and -- I've
4 got to have reasonable suspicion to act, if I believe
5 that he's in commit of a crime, to pat, to search, to
6 detain.

7 Q Okay. And reasonable suspicion, what does that
8 term mean to you?

9 A Reason to believe. I've got to believe that
10 there's something there before I can approach.

11 Q In your training, whether it was Alabama,
12 Stevenson, you know, the academy in Alabama, Stevenson,
13 Alabama, your test that you took for Tennessee, and your
14 training at South Pittsburg, Kimball, and Marion County
15 Sheriff's Office, did you ever have any training about
16 U.S. Supreme Court decisions that would guide your
17 performance of your duties?

18 A Now, say that again.

19 Q When you were having your training about search
20 and seizure, First Amendment, did you also have any
21 training on Supreme Court decisions that would guide your
22 role?

23 A We did have court cases that they brought up; the
24 right -- what to and what to not do, yes.

25 Q When it comes to Fourth Amendment, did you have

1 any training on the Supreme Court decision from 1969,
2 Mapp v. Ohio?

3 A Who?

4 Q Mapp versus Ohio?

5 A We didn't, no.

6 Q What about Terry versus Ohio? Sometimes it's
7 referred to as Terry stops.

8 A Yes. Yes.

9 Q What do you remember about that?

10 A You're talking about Terry frisks?

11 Q Yes.

12 A Yes. I got you.

13 Q What does that -- from your training, what do you
14 recall your training told you about that Supreme Court
15 decision?

16 A If I'm talking to you and I've got no suspicion
17 that you've done anything, why should I -- if you take
18 off running, why should I go after you? There's nothing
19 there has been committed for me to stop you. Let you go.
20 There's nothing that I've seen that has give me the
21 opportunity to go further in the investigation.

22 Q Okay. Do you realize there's been subsequent
23 Supreme Court decisions that says a police officer can
24 chase and detain someone that runs off?

25 MR. HICKEY: Object to the form.

1 A Repeat that now.

2 Q Are you aware that there's been a subsequent -- a
3 Supreme Court decision subsequent to Terry v. Ohio that
4 allows police officers to detain someone if they see them
5 run off upon police officer's approach?

6 And he had an objection.

7 MR. HICKEY: Yeah. Object to form.

8 A I'm sure they can.

9 Q In your training about Terry stops and frisks and
10 so on, and detaining people, were you trained about the
11 concept of reasonable articulable suspicion?

12 A Yes.

13 Q And what does that mean to you as we sit here?

14 A I've got a good reason or suspicion that he is
15 involved in something that he shouldn't be in. It
16 depends on the circumstances you look at. Because
17 there's several ways, several things could happen leading
18 up to it: A warrant, okay, signed by judge, and we come
19 to you and knock on your door and pick you up, I can pat
20 you down for safety reasons, put you in cuffs. Okay?

21 Q When it comes to seizing somebody -- we're not --
22 this is not a search case. But when it comes to seizing
23 somebody under the Fourth Amendment, what is your
24 understanding of what a seizure -- what would constitute
25 a seizure?

1 A Detain.

2 Q Okay. And tell me about that. What is -- you
3 know, give me examples. What does that mean to you?

4 A Stop his movement, detain him.

5 Q Okay.

6 A For safety, for his safety, for the safety of
7 others. Simple as that.

8 Q Would detaining someone also include removing
9 somebody from the location where they are at the time you
10 encounter them?

11 A It could, pertaining to what's went on.

12 Q Okay. Why would it not be a seizure, if you're
13 doing that as a law enforcement officer?

14 A So you're saying --

15 Q Let me ask you this because -- I'll get to the
16 meat of the coconut. I've got a video that shows you
17 taking Mr. Morgan, you're putting your hand on him. And,
18 you know, we're going to look at the video in a few
19 minutes -- where you're taking Mr. Morgan out of the
20 commission meeting.

21 A I did not take him out of the commission meeting.
22 He walked his own self out of the commission meeting.

23 Q I mean, that -- reasonable minds could, you know,
24 have a dispute over it. But --

25 MR. HICKEY: Object to the form.

1 Q When you and the sheriff ordered or -- well, we
2 probably just need to go to the video. We'll go to that
3 more in a minute.

4 We go back to your understanding of a seizure is
5 when it comes to removing somebody from where they are to
6 another place. Would you not agree with me that taking
7 someone -- let's say I'm here in this chair and you tell
8 me, either verbally or physically and verbally, you know,
9 take me out of this room, would that not be a seizure?

10 MR. HICKEY: Object to the form.

11 A No, because I didn't lay hands on you to take you
12 out. I said, like I say, let's go out and talk.

13 Q Are you familiar with levels of force that has to
14 be used --

15 A Only use the force that's necessary.

16 Q Are you -- do you understand that there's a
17 continuum of force when you're taking someone into
18 custody --

19 A Yes.

20 Q -- from your training?

21 All right. And that force could also, you know,
22 start with verbal commands, right?

23 A Yes.

24 Q It can go to soft-hand techniques, where you're
25 just grabbing someone or touching someone and trying to

1 take them from point A to point B; would you agree with
2 me?

3 A Yes.

4 Q And then it could go to hard hands, where you're
5 having to inflict blows, correct?

6 A Physical, yes.

7 Q Yes. And then you move to your second level,
8 impact weapons, which are -- well, slap jacks are not
9 nowadays, they were in my day.

10 A I remember that.

11 Q But batons and pepper spray and tasers, correct?

12 A Correct.

13 Q And then up to lethal force, use of a firearm,
14 correct?

15 A Yes.

16 Q Okay. So, you agree with me, though, that also
17 when you're seeking compliance with someone by giving
18 them verbal commands, that the more officers that are
19 around an individual would increase that coercive effect
20 on an individual, would it not?

21 MR. HICKEY: Object to the form.

22 A It might intimidate. It depends on the individual
23 himself and it depends on the circumstances that led up
24 to that.

25 Q But for regular Joe Blow citizen, if there's more

1 than one officer -- let's say there's you and the sheriff
2 of the county that's ordering someone to leave from where
3 they are to go somewhere else, you would agree with me
4 that would add a level of coercive effect to accomplish
5 the mission? The mission, i.e., being to get them out of
6 the room.

7 MR. HICKEY: Object to the form.

8 A I am -- I'm going to answer your question but I'm
9 going to explain first.

10 Q Yes, sir.

11 A I am -- I've been doing it for years. If I see
12 someone -- you, for instance, somebody's coming up,
13 trying to touch or trying to get loud, I'm going to do
14 what I can do to protect you and him.

15 So now back to your question. The sheriff did get
16 up. He had had surgery on his foot.

17 Q The sheriff did?

18 A Yes. And I knew that. And me being a citizen at
19 that point in time is when I thought it was going to get
20 out of hand. That's the reason I rose.

21 Q You know we have video of this that we're going to
22 go over.

23 A True.

24 Q So I'm going -- I think we've touched on what I
25 wanted to touch on on your training. Oh, also, did you

1 have training, whether it was in Alabama, or Tennessee,
2 at the agencies you worked for, on the concept of 14th
3 Amendment due process clause?

4 A We did.

5 Q And what does that mean to you?

6 A The quicker the better, due process. Have a
7 hearing.

8 Q What else does it mean to you? What does that
9 concept of due process under the 14th Amendment mean to
10 you, from your training?

11 A I'd have to review that. I mean, you know...

12 Q So you don't recall?

13 A I don't recall.

14 Q In your role as chief of police in Kimball,
15 Tennessee, did you ever have the unfortunate opportunity
16 to discipline officers?

17 A First of all, I never was chief of police in
18 Kimball.

19 Q I'm sorry. Thanks for correcting me. South
20 Pittsburg.

21 A Yes, sir, I was chief of police there.

22 Q And did you ever have the opportunity to
23 discipline officers while you were there?

24 A I did.

25 Q And without naming the individuals, can you give

1 me examples of the infractions that you had to discipline
2 officers for?

3 A Yes. Job performance.

4 Q What do you mean by that?

5 A When you're on patrol, the wheels are made to
6 turn.

7 THE REPORTER: I'm sorry, what?

8 A When you're on patrol, the wheels on cars are made
9 to roll.

10 Q Okay.

11 A Okay? And if you're not -- if that vehicle sits
12 still you're not doing your job.

13 Q For example, the officers would have to -- when
14 they're starting on a shift, they'd have to do the
15 starting mileage on the odometer --

16 A Yes.

17 Q -- and at the end of the shift?

18 A Yes. With that being said, understanding, too, it
19 depends on what goes on during that shift. Because
20 sometimes you may not even get a call and sometimes you
21 may get several calls, so the mileage is going to -- you
22 just have to look at stuff like that.

23 Q Did you ever have to discipline officers for
24 unlawful arrests or unreasonable seizures?

25 A No, sir.

1 Q Did you ever have to discipline officers for
2 violating the First Amendment rights of individuals
3 within the jurisdiction of South Pittsburg?

4 A No, sir.

5 Q Was there ever an opportunity where you had
6 complaints about excessive force or violation of First
7 Amendment rights that you had to investigate?

8 A No, sir.

9 Q Never --

10 A Never.

11 Q -- in seven years?

12 A No.

13 Q Okay. While you were chief of police at South
14 Pittsburg PD, did you ever have an officer by the name of
15 Rodney Patton that worked there, used to be a deputy at
16 Hamilton County Sheriff's Office?

17 A I wasn't chief at that time.

18 Q Were you a patrolman there?

19 A I was a patrolman.

20 Q And do you recall why he was terminated from that
21 job at South Pittsburg?

22 A That's above my pay scale. I have no idea.

23 Q Now we're going to focus more on the meeting of
24 January 22, 2024.

25 A Yes, sir.

1 Q Or at least that's what we had on our complaint.

2 MR. FLORES: Tom, wasn't there an issue that
3 was the actual date on that?

4 MR. HICKEY: Yeah. I think the minutes say
5 that due to weather it was -- it was scheduled for the
6 22nd but it was completed on the 29th.

7 MR. FLORES: 29th.

8 MR. HICKEY: But I think if -- you can refer
9 to it as either date is fine. I think it was originally
10 scheduled for the 22nd. Those dates are what they are.

11 MR. FLORES: Yeah, because I don't have a
12 date time stamp on these videos.

13 MR. HICKEY: And that's just on the minutes.
14 I obviously wasn't there. But that's my understanding.

15 BY MR. FLORES:

16 Q So, Deputy, while you were there at the commission
17 meeting on January -- for your understanding of
18 commission meetings, are they held once a month?

19 A Yes, sir.

20 Q All right. And how often do you -- or even to the
21 present day, do you attend those meetings?

22 A Sometimes I do. It depends on what I have going
23 on.

24 Q And on -- we'll just, just for -- because, you
25 know, we've stipulated -- or recognized on the record

1 that there may be some issue with the exact data based
2 upon the agenda.

3 Have you looked at the agenda or have you reviewed
4 the agenda for --

5 A No, sir, I haven't.

6 MR. FLORES: So, Tom, just for this record,
7 I've got the agenda minutes I'd like to give you.

8 And we can mark this as his next exhibit,
9 please.

10 MR. HICKEY: These are an exhibit to...

11 MR. FLORES: Mr. Morgan.

12 MR. HICKEY: You can re-mark them if you want
13 to.

14 MR. FLORES: Go ahead and mark that, please.

15 ([Exhibit 10](#) was marked.)

16 BY MR. FLORES:

17 Q And, Deputy, this is just more to, you know,
18 tighten up the record, is that -- we've probably got it.

19 You weren't present for the June council meeting,
20 2024?

21 A Do what now?

22 Q Were you present for the June 2024 council
23 meeting?

24 A I don't know if I was or not.

25 Q I don't think you were, so we're not going to

1 touch that.

2 MR. FLORES: Again, just for the record, Tom.

3 ([Exhibit 11](#) was marked.)

4 Q And, Deputy, I'm showing you Exhibit -- it's 11
5 and 10. There was -- the agenda for the commission
6 meeting, which is [Exhibit 11](#), has January 22 and then on
7 [Exhibit 10](#), the minutes show January 29, 2024.

8 A Yes, sir.

9 Q So for our purposes today, I'm going to refer to
10 the January 29, 2024 meeting, just so there's no
11 confusion. Okay?

12 A Okay.

13 Q That's just for the record, for things that
14 lawyers do. So you can set that aside if you want to.

15 So on the January 29 meeting, you said you were
16 there as a private citizen. Do I understand that
17 correctly?

18 A Yes, sir.

19 Q And so did you have any duties assigned to you,
20 such as maintaining order or security?

21 A Not that night.

22 Q Not that night. All right. Have you in the past,
23 prior to the June 29 meeting?

24 A I've never been assigned to a duty at a county
25 commission meeting.

1 Q All right. Now, on the January 29th meeting were
2 you in uniform or otherwise identifiable as a law
3 enforcement officer?

4 A I wasn't.

5 Q What were you wearing -- we've got the video, but
6 what do you recall that you were wearing that day?

7 A I wasn't wearing no uniform. I couldn't recall
8 what I was wearing, to be honest with you.

9 Q So can you describe, step by step, what you
10 observed during the public comment portion involving
11 Mr. Morgan at the January 29 commission meeting?

12 A Yes. I was sitting in the -- sort of the middle
13 section, middleways back.

14 I've never laid eyes on Mr. Morgan before. Okay?

15 And then they went under public comments. So,
16 Ms. Mason called his name out. And I remember looking
17 back -- hearing a voice to my right, back, and I had to
18 turn around and look. And there was a gentleman standing
19 up there, and he was talking.

20 Q Okay.

21 A She -- and something happened before that. A
22 gentleman got up, talking about Pull Tight Road.

23 Q Would that be someone other than the plaintiff,
24 Mr. Morgan?

25 A I didn't know at that time, but yes.

1 Q Would it be -- as we sit here now, do you
2 understand it was a fellow by the name of Donald Leonard?

3 A Is that who they call Red Beard?

4 Q That's -- yes, that's what I understand.

5 A Okay. He was at that meeting.

6 Q Okay. So was it this guy that was addressing
7 Ms. Mason -- or the commission?

8 A Red Beard was addressing Ms. Mason about an
9 incident.

10 Q On Pull Tight Road?

11 A On Pull Tight Road.

12 Q And what do you recall of that?

13 A As far as I can recall, it was gunshots; the road
14 needs fixed, repaired; the train, too loud, because
15 there's a crossing there. Issues like that. And he did
16 address the commission. And they addressed something --
17 they answered him.

18 Q Who is "they"?

19 A "They." The commission started asking questions.
20 Linda Mason was the chairperson at that time. And she
21 spoke to him. I don't recall what she said to him
22 exactly. And then it went to discussion or something,
23 and then next thing I know she was calling Mr. Morgan
24 out. He was next on the agenda, I guess. I don't know.
25 I ain't even looked at the agenda.

1 Q That's [Exhibit 11](#).

2 A Mr. Morgan stood up, started talking. He was
3 loud.

4 Q Let me stop you here. Was he at a microphone when
5 he was talking loud?

6 A Not at first.

7 Q Would you agree with me that if you're -- I mean,
8 how many feet was he away from the commissioners when he
9 was addressing them?

10 A Probably about 15 yards.

11 Q All right. Continue, please.

12 A He stood up in the back and he started talking
13 about Pull Tight Road.

14 Q Let me stop you there. When you said "stood up in
15 the back," was he all the way to the back of the room?

16 A He was behind me.

17 Q Behind you. Okay. How many feet behind you?

18 A He was behind me. And I heard the voice --

19 Q I'm sorry. How many feet behind you was he --
20 from you was he, if you recall?

21 A Twelve foot.

22 Q Twelve feet. Okay. Continue, please.

23 A And he stood up, was addressing the commissioners.

24 And Ms. Mason would've been the chairperson. He was --

25 in regards to another incident about Brown -- another

1 road that the county was going to do some work on.

2 Q Okay.

3 A And something about the residents in that road,
4 they was going to spend a lot of money, why can't they do
5 something with him, on Pull Tight Road. And Ms. Mason
6 told him he needed to go to the mic so everybody could
7 hear him.

8 Q Let me stop you here.

9 A Okay.

10 Q If he was talking loudly when he was behind you
11 and to the right about 12 feet, why would he have to go
12 to the mic for everybody to hear him?

13 MR. HICKEY: Object to the form.

14 A I can't recall that. I don't know.

15 MR. HICKEY: Object to the form.

16 Q All right. Continue, please.

17 A Because everybody else had went to the mic. I
18 know that.

19 Q Including Red Beard, Mr. Leonard?

20 A Red Beard, yes. I think Red Beard went. Because
21 everybody usually goes to the mic to talk, to speak, to
22 conduct business with the commission.

23 Q Okay.

24 A Okay. Once Mr. Morgan got up, he must've said
25 something that he wasn't supposed to say. I don't know.

1 And she confronted him, Ms. Mason did, and said, "If
2 you're going to talk you need to go to the mic."

3 He come forward, and he said, "I'm pretty loud.
4 Why should I have to go to the mic? They can all hear
5 me. I'll speak up."

6 And she said, "If you're going to do business in
7 the area, go to the mic so everybody can hear you."

8 I don't know. I don't know. But anyway, he did
9 go to the mic, the podium, and he continued to talk at
10 the podium to Ms. Mason, to the commission.

11 Q Okay.

12 A And...

13 Q I am paying attention to you. I'm just getting
14 this synched up.

15 A Okay.

16 Q Continue, please.

17 A And I don't know what went on. Because I had a
18 gentleman beside me was talking. I don't remember who he
19 was. But anyway, next thing I hear is Morgan
20 addresses Mason about she needs to do something more
21 respectfully to him, stuff in that nature. I can't
22 recall word to word what it was.

23 Q Yes, sir.

24 A Then he had a comment and spouted off, and it was
25 just, like, one on one, them two.

1 Q Let me stop you here. When you say "spouted off,"
2 what do you mean by that?

3 A Outburst.

4 Q What you do mean by outburst?

5 A Trying to get -- talk over her. Get louder, talk
6 over her. And she got louder.

7 Q Okay. Let me ask you, would you agree with me
8 that video and audio of the actual incident would
9 probably be better evidence of what went on than what you
10 or I would say?

11 A It might refresh my memory.

12 Q But I'm just asking you from your memory at this
13 point. We'll go over the video in a minute.

14 Okay. So he spouted off. They were going -- did
15 you say they were going back and forth with each other?

16 A They was.

17 Q Now, you -- what was your understanding of Linda
18 Mason's role that evening on the county commission?

19 A She is the chairperson. She conducts -- she holds
20 the meeting. She is the spokesperson for the
21 commissioners, unless it's in a discussion, and then they
22 all discuss.

23 Q Okay.

24 A She goes off an agenda and she controls the
25 meeting. Any outburst, she's got the right to safeguard

1 other people.

2 Q All right. In your -- all right. In your
3 training as a law enforcement officer, you understand --
4 do you understand that -- or did your training tell you
5 that simply because a citizen says something to you that
6 you may not like isn't grounds to seize the person?

7 A I have -- no. Because I have people say stuff
8 about me all the time, and I just ignore it.

9 Q And do you understand the Supreme Court years ago
10 said that police -- this is just police -- police are to
11 be made of a higher metal, and so fighting words by
12 itself isn't a basis to make an arrest?

13 A Right.

14 Q Is that your understanding?

15 A Yes.

16 Q Now, do you also understand -- at the time that
17 Linda Mason was doing what she was doing, you know, with
18 Mr. Morgan, from your understanding was she operating as
19 the head of the Marion County commission?

20 A Yes.

21 Q Okay. And would it be fair to say that Ms. Mason
22 simply didn't like what she was hearing from Mr. Morgan,
23 that it was irritating her?

24 MR. HICKEY: Object to the form.

25 A It seemed like it was. But I don't know what

1 prior they had going on. Because that's -- I didn't
2 attend the meetings before, and I attended that one and I
3 didn't attend none afterward. So I don't know what went
4 on to bring all this up.

5 Q Understand. So the answer is yes, it appeared
6 that she was getting agitated with him?

7 A Both of them was.

8 Q Okay. With each other, right?

9 A Do what?

10 Q They were getting agitated with each other?

11 A Each other.

12 Q She was arguing him and he was arguing back?

13 A They was arguing, yeah. It was like one on one.

14 Q And he was responding to her, was he not?

15 A He was.

16 Q Have you ever been at a commission meeting when a
17 county commissioner ever said when it came -- well,
18 there's a blurb in here, and I'll get to that.

19 Were you present when -- you were present from the
20 start to finish of the county commission meeting, weren't
21 you, on January 29th, 2024?

22 A Until I walked with Mr. Morgan outside.

23 Q Gotcha. But the answer -- until that event with
24 you taking Mr. Morgan -- or going with Mr. Morgan out, or
25 however we're going to characterize it, you were present

1 from the start to that point, right?

2 A Once I got -- yes. I come back in the meeting,
3 yes.

4 MR. FLORES: What I'd like to do now -- I've
5 got the entire commission meeting from start to finish on
6 a flash drive. I'd like to mark it as our next exhibit.

7 (Exhibit 12 was marked.)

8 MR. HICKEY: Are you about to play it?

9 MR. FLORES: Yes.

10 MR. HICKEY: Can we --

11 MR. FLORES: Yeah. Let's take a break.

12 (Recess from 10:01 to 10:09.)

13 MR. FLORES: Deputy, I'm going to refer you
14 to an incident here that we have in our complaint. I
15 don't know if you can hear this.

16 (Video plays.)

17 THE WITNESS: Is this leading up to the
18 incident?

19 MR. FLORES: I'll have to get over there.

20 MR. HICKEY: It's leading up to a certain
21 thing.

22 THE WITNESS: Okay.

23 (Video plays.)

24 BY MR. FLORES:

25 Q Deputy, at time stamp 1 hour 35 minutes .01

1 seconds, who is this person that's addressing Linda
2 Mason?

3 A This one (indicating)?

4 Q Yes.

5 A That is Ruric Brandt, is what it says.

6 Q So you don't know him personally?

7 A I don't. I just know him through the commission.

8 (Video plays.)

9 Q And the person that's -- oh, talking about the
10 volume?

11 A Yeah. Open that up, right there, to where it'll
12 be more. You're at 95 percent. Maybe that'll help.

13 Q Who is this speaking?

14 A This here?

15 Q At 1 hour 35 minutes 47 seconds.

16 A That is the county attorney.

17 Q And his name? I know, but for the record.

18 A Billy Gallagher.

19 (Video plays.)

20 Q And again, that's Mr. Brandt?

21 A Brandt.

22 Q Brandt, asking the question about the chairman of
23 the commission meeting being a part of it.

24 (Video plays.)

25 So in response to Mr. Brandt's question about the

1 chairman, Ms. Mason, participating in a discussion about
2 relinquishing the gavel, you heard her say "I never
3 follow the rules. I am opinionated." That's what the
4 video shows us, right?

5 A I did hear her say she don't follow the rules,
6 yes.

7 Q Now, there's a lot of laughter there, but would
8 you agree with me, for the citizens that were there
9 watching this, that could be taken as something not
10 funny, not a joke?

11 MR. HICKEY: Object to the form.

12 A They did laugh.

13 Q Well --

14 A But I don't know...

15 Q Did you laugh?

16 A No, I didn't.

17 Q Would you agree with me that a person, a citizen
18 that's just there watching this, you know, watching a
19 commissioner of the county commission making a joke about
20 not following the rules and being opinionated, that a
21 reasonable person could take that the wrong way, that
22 doesn't want to follow rules and does what she wants?

23 MR. HICKEY: Object --

24 A I can't answer for nobody else. I can just answer
25 for myself.

1 Q Okay.

2 A She did say that. And once it comes past your
3 lips you can't take it back.

4 Q Was it -- do you believe it was appropriate for
5 her to say that?

6 MR. HICKEY: Object to the form.

7 A Well, she did. I can't -- I don't know.
8 Appropriate? She could've went about it another way.

9 Q Fair enough. Do you know why she's no longer the
10 commissioner -- the chairperson of the commission?

11 A She is a commissioner, but I don't know why she's
12 not the chairperson. I don't know.

13 Q And I'm just assuming, because, you know, the
14 population of Marion County is not that large, you would
15 probably know this. She also works for the City of
16 Jasper, correct?

17 A From my understanding, yes.

18 Q Were you ever made aware that the City of Jasper
19 was under an audit at some time by the Tennessee
20 comptroller for issues involving pay to employees, in
21 particular her husband, Billy Mason?

22 A No, I'm not.

23 Q Billy Mason is the chief of police of the Jasper
24 PD, police department, correct?

25 A He is.

1 Q So, focusing on this particular meeting, we just
2 saw a snippet of Ms. Mason saying "I never follow the
3 rules. I am opinionated."

4 I want to go back to what you were describing
5 about the events that led up to Mr. Morgan's -- you know,
6 prior to his removal.

7 So he goes over to the mic, if I understand that
8 correctly. He goes over to the mic, and he goes to the
9 mic and begins to discuss -- have this back and forth
10 with Ms. Mason. And I think it seemed from your
11 perspective they were arguing with each other?

12 A They're going one on one with each other, yes.

13 Q And when we say "one on one," help me understand
14 what you mean by that.

15 A Morgan was talking, Mr. Morgan was talking, Linda
16 Mason was talking. Morgan got louder. She was trying to
17 quieten him down and he kept getting louder. That
18 nature.

19 Q Okay. Do you recall -- before we look at the
20 video, do you recall if Mr. Morgan ever expressed
21 displeasure with Linda Mason talking over him?

22 A Now, say again.

23 Q Do you recall if Mr. Morgan was expressing
24 displeasure with Linda Mason cutting him off,
25 interrupting him, talking over him?

1 A They did interrupt each other, yes.

2 Q All right. But you don't remember him expressing
3 that displeasure?

4 A I don't.

5 Q All right. Now, did you hear any -- were you
6 still seated -- let me go to that. I'm just going to
7 show you -- on Exhibit 12, I'm just going to show this to
8 you. At time stamp 2 hours and 30 seconds, there's some
9 dude at the podium. The field of view or the position
10 here looks like to the left of the person who recorded
11 this. Was that your view or close to your view of the
12 podium as well?

13 A That's the front row. I'm saying that was the
14 front row.

15 Q And you're in the back?

16 A I was in the middleways, yes.

17 Q Oh, middleways.

18 A I'm behind them.

19 Q All right. But is it generally correct that the
20 podium was to your left as you --

21 A Yes.

22 Q -- were seated?

23 A Yes.

24 Q Did you hear any instructions or requests given to
25 the plaintiff by Ms. Mason before any removal was sought.

1 A I don't recall at that time.

2 Q All right. And what prompted your involvement in
3 the exchange between Mr. Morgan and Ms. Mason?

4 A What? Say that again.

5 Q What prompted your involvement?

6 A Well, you could hear the tension between the two.
7 They got everybody's attention.

8 Q Okay. And what do you mean by "everybody's
9 attention"?

10 A Everybody's attention there in that county
11 commission meeting.

12 Q All right.

13 A They got everybody's attention just to focus on
14 them two.

15 Q All right. So that's what prompted you to
16 initially get involved?

17 A What prompted me to get involved is whenever
18 Ms. Mason called on me to remove him. That's what got me
19 involved. I don't know what...

20 Q Okay. But wasn't the sheriff already over there?

21 A The sheriff had got -- she called on the sheriff
22 first.

23 Q Okay. And what do you recall as we sit here now
24 that prompted the sheriff to go over there, to where
25 Mr. Morgan was at the podium?

1 A What prompted him? I couldn't tell you what
2 prompted him.

3 Q Now, who first requested, signaled or instructed
4 that the plaintiff, Mr. Morgan, should be removed from
5 the meeting?

6 A Ms. Mason.

7 Q All right. And can you explain that?

8 A She -- something was exchanged in words, and she
9 just said, "Sheriff, would you please escort him out of
10 the meeting?" Something to that nature. I don't
11 remember exact words. Then the sheriff got up.

12 Q Do you remember at any point prior to Mr. Morgan
13 going from his position where he -- in the crowd, or I
14 call it the gallery, where people are sitting to your
15 right, do you remember Ms. Mason interrupting Mr. Morgan
16 and saying, "Listen, buddy, we're not going to go there,"
17 or words to that effect?

18 A I did.

19 Q What did you -- what impression did that leave you
20 with, the way she addressed him?

21 A I don't know what he was saying but he was -- she
22 wanted to -- power.

23 Q Power?

24 A Power.

25 Q What do you mean by that?

1 A Control.

2 Q She wanted to control what he was saying? Is that
3 yes?

4 A She was just wanting to get him to go to the
5 podium, and she just told him -- and point her ink pen or
6 finger or something at him and said, "We're not going
7 there, buddy." It's on video.

8 Q I know, but what's the impression it left with you
9 is what I'm asking?

10 A It wasn't what I thought would -- it wasn't what I
11 thought, but...

12 Q What did you mean by that?

13 A It's could've been addressed differently.

14 Q By Ms. Mason?

15 A Yes.

16 Q When you say "power," did the impression it leave
17 on you that she was trying to wield her power in a way to
18 intimidate Mr. Morgan?

19 A You've got to remember, Ms. Mason is a former law
20 enforcement officer. Okay?

21 Q Okay.

22 A And we're taught, law enforcement, to deescalate
23 somebody you've got to go above them to bring them down.
24 You know what I'm saying?

25 As far as individually, if he's talking to a limit

1 here, you've got to go above him to bring him down.

2 Q But she's not a law enforcement officer.

3 A No, she's not. She's got that mentality. You've
4 been there, you know. It's something you never forget.

5 Q Yeah. But, you know, she's not wielding police
6 authority, she's actually wielding, you know -- the
7 position as the ultimate person in charge of Marion
8 County is the chairperson, right?

9 A True. Yes.

10 MR. HICKEY: Object to the form. That's not
11 true.

12 MR. FLORES: Well, I'm just asking him what
13 he -- his understanding.

14 Q So your understanding is, as the chairperson of
15 the Marion County commission she's the head honcho of
16 Marion County?

17 MR. HICKEY: Object to the form.

18 A I don't know how that works. I don't know how --
19 she was that night, yes.

20 Q But she was -- you're familiar with the concept of
21 three separate branches of government, right?

22 A As far as?

23 Q Of any government. Do you know what the three
24 branches, separate branches of government are?

25 A City, county, and state. Yes.

1 Q Judicial branch, legislative branch, executive
2 branch.

3 A Uh-huh. Yes.

4 Q The county commission, you agree with me, is the
5 legislative branch of the government for Marion County,
6 right?

7 A Yes.

8 Q And Linda Mason as chairperson at the time of this
9 event, she was the head person in charge of the
10 legislative branch of Marion County, correct?

11 MR. HICKEY: Object to the form.

12 A She was the chairperson.

13 Q The head person of the executive branch of Marion
14 County government is the county mayor, correct?

15 A Yes.

16 Q And is there a judicial officer in Marion County,
17 as a sessions court judge?

18 A Yes.

19 Q And that's Mark Raines, right?

20 A Yes.

21 Q And the sheriff, to your understanding, he's the
22 constitutional officer over the sheriff's office in
23 Marion County, right?

24 A Yes.

25 Q And what I mean by constitutional officer, by

1 Tennessee state constitution he has -- and state statute
2 he is the man in charge of the sheriff's office, right?

3 A Yes.

4 Q And so if I understand you correctly, you believe
5 that Ms. Mason reverted back to her police officer time
6 in trying to control something that she didn't like with
7 Mr. Morgan?

8 A That's my opinion, yes.

9 Q And where was she a police officer?

10 A Whatever she was, she was a police officer at
11 Jasper city.

12 Q And how long was she there?

13 A I have no idea.

14 Q And do you know why she left law enforcement?

15 A I don't.

16 Q Do you know the time frames --

17 A I don't.

18 Q -- when she was employed there?

19 A I don't.

20 Q If you could take a look at [Exhibit 9](#),
21 interrogatory number 5, if you would, please.

22 A Yes, sir.

23 Q And your answer -- I'd asked you to explain the
24 authority under which you acted to remove the plaintiff
25 from the commission meeting and any instructions you

1 received from Linda Mason or anyone else regarding the
2 removal. You said you did not remove him and you weren't
3 acting under any particular authority.

4 So, are you telling me that Mr. Morgan could've
5 just said no, I'm not leaving, and you weren't -- he
6 could've stayed?

7 A He could've.

8 Q And you didn't escort him to the door?

9 A He walked on his own freewill.

10 Q But you were with him, weren't you?

11 A I was with him.

12 Q And weren't you also there when Ms. Mason asked
13 you to make sure he -- you know, take him out of the
14 building?

15 A I don't know exact words she had, but yes, I was
16 there.

17 Q So you were with him the whole time when he was at
18 the door of the commission meeting room, right?

19 A At the door?

20 Q Well, you took him out of the commission meeting
21 room, correct?

22 MR. HICKEY: Object to the form.

23 A He walked on his own out of the commission room.

24 Q But you were with him?

25 A I was with him.

1 Q Okay. And he goes out the door?

2 A Yes.

3 Q And he turns around and -- he turns around, and
4 Ms. Mason tells you he needs to leave the building. Do
5 you remember that?

6 A I don't recall that.

7 Q So did you receive any verbal or nonverbal
8 direction from Ms. Mason or anyone else to take action
9 against Mr. Morgan? Or Donald Leonard would be the
10 anyone else.

11 A No.

12 Q She didn't instruct you to do anything?

13 A Mason did.

14 Q Mason did.

15 A Yes.

16 Q What did she instruct you to do?

17 A That he needs to leave the building.

18 Q And that was Mr. Leonard or Mr. Morgan?

19 A Morgan.

20 Q Morgan. Okay.

21 A I didn't have no dealings with Leonard.

22 Q You had none with him at all?

23 A No.

24 Q And so from -- there's one point that she wanted
25 him out of the commission meeting room, right?

1 A Yes.

2 Q And then there was another point where she wanted
3 him out of the building, correct?

4 A I don't recall, but...

5 Q Well, is that yes, no, or you don't recall?

6 A I don't recall that. I mean, it could be, but I
7 don't know.

8 Q Did you walk with Mr. Morgan as he went outside
9 the building?

10 A I did.

11 Q And was the sheriff with you?

12 A No, sir.

13 Q Was there a Jasper police officer or anybody else
14 there?

15 A I don't recall no one being there with me.

16 Q Since the January and June instances, of 2024,
17 have there been police officers from the city of Jasper
18 that have been stationed there, present for these
19 meetings?

20 A I've been to one meeting since and there was
21 officers there.

22 Q And what month and year was that meeting?

23 A It was 2025.

24 Q 2025. And as we sit here today, you understand
25 that Linda Mason is married to Billy Mason who was the

1 chief of police at Jasper PD, correct?

2 A Correct.

3 Q And from what I understand from you, from the time
4 that you're not certain of but it was after at least June
5 2024, you attended one meeting where Jasper city police
6 were stationed?

7 A No.

8 Q No? Okay.

9 A Jasper city -- no, it was the county.

10 Q County officers, deputies.

11 A Yes.

12 Q Not Jasper city officers?

13 A No.

14 Q All right. I know you're saying -- and what we do
15 as lawyers, you know, words matter, you know, and how
16 things are expressed or said or written. I know you said
17 that you did not remove him. But what authority do you
18 believe you had to have taken the actions that you did
19 that day, on January 29, 2024?

20 A My concern at that point in time was the safety of
21 the people in the commission meeting, along with
22 Mr. Morgan himself.

23 Q What did Mr. Morgan do that made you think that he
24 was a threat to the safety of anyone in the commission
25 meeting?

1 A The way that he was talking, the loudness of his
2 voice -- he may have a voice that carries, I don't know,
3 but I felt like that it was fixing to get out of hand.
4 And with the sheriff just having surgery on his foot, I
5 knew, you know, I wasn't going to...

6 Q Why didn't you tell -- I'm sorry. Were you
7 finished? I don't think you were finished. I'm sorry.

8 MR. HICKEY: You said with the sheriff having
9 surgery on his foot you knew, and then you kind of
10 tapered off a little bit. I don't know if you were
11 finished.

12 A I knew the sheriff had surgery on his foot. I
13 don't know what he had. Something with his toe or
14 something, I don't know. And I knew he wasn't in -- if
15 something went bad, he couldn't handle him hisself.

16 Q Help me understand. So you took -- it was your
17 own initiative to get involved with Mr. Morgan?

18 A No. It was Linda's idea. She's the one that
19 called on me.

20 Q All right. Thank you for clarity.

21 Now -- and we're going to look at the video for
22 the entire encounter. We're going to go through when
23 Mr. Morgan starts to address them until the end.

24 At any point prior to your engagement with
25 Mr. Morgan, did you consult with other law enforcement

1 officers, commissioners, or county officials about
2 removing Mr. Morgan at all?

3 A No, sir.

4 Q You had no consultation with anyone?

5 A No.

6 Q All right. Now, just in general, what authority
7 did you believe you had, in January of 2024 to the
8 present day, to remove somebody from a public commission
9 meeting? What authority did you believe you hold to do
10 that?

11 A Linda Mason was the chairperson of the county
12 commission meeting that was being conducted that night.
13 It was getting loud and it could've went sour quick. And
14 I don't know if she was -- I don't know how she was
15 seeing things, if she was protecting, I don't know, but
16 she wanted him removed.

17 Q You thought she was trying to protect people?

18 A I'd say. That's my opinion.

19 Q And so it didn't appear to you that she was just
20 getting personally angry?

21 A They had -- they was going at it one on one.

22 Q Did it appear to you she was getting personally
23 angry with Mr. Morgan because she just didn't like what
24 he had to say?

25 A She could have, yeah.

1 Q But it didn't appear that way to you?

2 A On both parties, yes, it was.

3 Q What action did you take to deescalate Ms. Mason?

4 A I didn't deescalate Ms. Mason.

5 Q Why didn't you advise her that, hey, look, you
6 need to calm down yourself, or words to that effect?

7 A I didn't.

8 Q But wouldn't you? Why not?

9 A I can't answer that.

10 Q Were you concerned that it might've affected your
11 job if you had taken --

12 A No.

13 Q -- action like that?

14 A No.

15 Q Have you ever in law enforcement had a situation
16 to where you either conducted a traffic stop on an
17 elected official and they, because of their position,
18 made you feel -- intimidated is not the right word, but
19 give you pause to do what you were going to do, such as
20 write a ticket to them or anything along those lines?

21 A I can refer to that real well.

22 Q Okay. How --

23 A If you want me to elaborate on it.

24 Q Sure. Please. From South Pittsburg, I'm
25 assuming?

1 A Oh yes. The city administrator, Sammy
2 Burrows -- I was chief of police at that time. One of my
3 officers stopped him for speeding, and he engaged his
4 lights to get him to stop, on a traffic stop. He refused
5 to stop. So he went about three more blocks, turned up
6 on 12th Street, turned right off 12th on Holly, stopped
7 in front of the old hospital. Ben Canales was the
8 officer at that time. He walked up to the black Tahoe,
9 or whatever he was driving, and it was the city
10 administrator. About that time, the sergeant pulls up,
11 of the shift. Just them two working. Paul West.

12 And I get a phone call. I was at home in the bed,
13 about 1:00 in the morning. I get a phone call, they need
14 me down where this traffic stop was at. So I get up and
15 I go. I pull up on the scene. I seen Ben Canales there.
16 Paul West was already gone. He'd made an arrest. Took
17 him to jail.

18 Q Took the commissioner to jail -- or the
19 administrator?

20 A Took the city administrator to jail, Sammy
21 Burrows. And, yeah, there was some heated exchanges
22 afterwards. But I tell them to do their job. Nobody is
23 above the law. I get my pants on one leg at a time just
24 like everybody else does. Do your job. No matter who it
25 is, do your job.

1 Q So that's an example of how -- doesn't matter if
2 they've got a public office or not.

3 A True.

4 Q And a question about -- you know, I asked you
5 about did you discuss anything with anyone else prior to
6 your involvement with Mr. Morgan. Did you reference any
7 sheriff's office policies or training, you know, some of
8 your training, you know, consider your training and the
9 policies of the sheriff's office prior to acting at
10 Ms. Mason's request?

11 A Why would I?

12 Q Well, why wouldn't you?

13 MR. HICKEY: Just answer his question. If
14 you did, you did; if you didn't, you didn't.

15 A I didn't. I mean, I didn't.

16 Q Okay. Now, can you describe exactly the actions
17 you took with your interaction with Mr. Morgan, from
18 start to finish?

19 A When I got addressed to approach --

20 Q By Ms. Mason?

21 A By Ms. Mason.

22 Q Okay.

23 A I went to Mr. Morgan. I got about three foot from
24 him, two foot from him, and all of a sudden he said,
25 "Don't touch me." I thought somebody was behind me he

1 was talking to, but he was talking to me, apparently. I
2 never laid hands on Mr. Morgan. I said, "let's go
3 outside. Let's just go outside and talk."

4 Q Let me stop you here. You said you never laid
5 hands on Mr. Morgan?

6 A Not at that time.

7 Q Okay. Was there anytime that you put your hands
8 on him?

9 A I did. I shook his hand out in the parking lot.

10 Q Shook his hand out in the parking lot?

11 A And told him what to do for the -- to get back on
12 the next meeting.

13 Q All right. Continue, please.

14 A And he asked me who I was, and I told him. And
15 he -- we went walking out the commission room forum. And
16 we had to go out another door to go outside. So once we
17 got outside in the parking lot, he said, "You've violated
18 my First Amendment rights," talking to me. I said, "I
19 didn't -- I wasn't the one that wanted you removed. I
20 didn't violate your First Amendment rights." I said,
21 "Here's what I would do." And I told him who I was. And
22 I took his hand and I said, "If I was you, I'd contact
23 the mayor's office tomorrow morning." It was in the
24 first of the week. I don't remember -- "and get put back
25 on the agenda, and that way you can speak again."

1 Q Okay.

2 A And I just directed -- I guided him to what to do
3 to get back on the agenda, who to call. And that was it.

4 Q All right.

5 A And he may've left. I don't know. But I turned
6 around and went back in the commission meeting.

7 Q When you went back into the commission meeting,
8 did you have any conversations with Linda Mason?

9 A No, I didn't. She was addressing something else
10 at that time. No, I didn't.

11 Q After this event, did you have any conversations
12 with Linda Mason about what occurred?

13 A No.

14 Q After this event, did you have any conversations
15 with Billy Gallagher about what occurred?

16 A No, sir.

17 Q After this event with the plaintiff, did you have
18 any discussions with the sheriff about what occurred?

19 A I might've had, but I can't recall. Because we
20 talk periodically, because I'm in there all the time, in
21 and out. It may've been in passing. I don't, I don't
22 recall.

23 Q All right. You already answered this. You said
24 you had no physical contact, other than a handshake --

25 A Outside, yes.

1 Q -- with Mr. Morgan. What about the sheriff? Did
2 he have any physical contact with the plaintiff,
3 Mr. Morgan?

4 A I didn't see him.

5 Q You didn't?

6 A I didn't see it.

7 Q Could it have occurred and you just didn't see it
8 happen?

9 A I didn't see it.

10 Q Okay. Was there any point that the plaintiff,
11 Mr. Morgan, told you not to touch him?

12 A Yes. When I first walked up to him.

13 Q Okay. How did you respond? Do you remember?

14 A How did I respond?

15 Q Yes.

16 A I turned around and looked behind me, thought
17 somebody else was behind me. I didn't know he was
18 talking to me, you know. And he said, "Don't touch me."
19 And I thought, well, there's somebody back here going to
20 grab him. I didn't know.

21 Q You may have already touched on this, but I've got
22 very specific questions here.

23 Was Mr. Morgan escorted out or did he leave on his
24 own without escort?

25 A He left on his own freewill.

1 Q But you were with him all the way out into the
2 parking lot?

3 A I walked with him.

4 Q And this was after Linda Mason had got you
5 involved to take him out of the commission meeting,
6 right?

7 A Yes.

8 Q And you don't recall the plaintiff ever telling
9 you not to touch him?

10 MR. HICKEY: Object to the form. I think he
11 answered that one, a couple times.

12 Q Did the plaintiff tell -- I'll just make it clear.
13 Because you had said on your interrogatories, on Exhibit
14 9, interrogatory...

15 MR. HICKEY: I don't think these pages are
16 numbered.

17 MR. FLORES: No, they're not. So let's go to
18 the fourth page. Well, I'll just ask the question,
19 because I don't want to waste your time trying to narrow
20 it down.

21 BY MR. FLORES:

22 Q Just so I'm clear and it's clear on the record,
23 did Mr. Morgan tell you, when you first approached him,
24 tell you not to touch him?

25 A He did say that.

1 Q All right. And it was only you and Sheriff
2 Burnett that assisted -- or that had interaction with
3 Mr. Morgan at the commission meeting?

4 A Besides Ms. Mason, yes.

5 Q And no other law enforcement officers.

6 A No, sir.

7 Q And none outside, out in the parking lot?

8 A No, sir.

9 Q You might've already said this, but did you
10 communicate directly with Mr. Morgan as he was leaving
11 the building, or was it outside of the building? I think
12 you already told me that you said for him to call the
13 county mayor's office and get on the agenda?

14 A I told him that outside the building, yes.

15 Q All right. And prior to your testimony today.
16 What documents did you review in preparing for your
17 deposition?

18 A What documents?

19 Q Yes.

20 A I reviewed all the case file that was provided. I
21 even pulled it up on the Internet, you know, and looked
22 at it.

23 Q What do you mean, case file? What do you mean by
24 that?

25 A Just what I've got in front of me. Just stuff

1 that I've received.

2 Q The interrogatories and --

3 A Yes.

4 Q -- request for production?

5 A Stuff like that, yeah. The questions, yes.

6 MR. HICKEY: It came from me.

7 Q Anything else? Did you review anything else?

8 A The video.

9 Q Okay.

10 A It's public record.

11 Q And you reviewed the video?

12 A I did.

13 Q And that's Exhibit 12, what we're looking at?

14 A Yes.

15 MR. HICKEY: It's what he's been showing you
16 on the laptop.

17 THE WITNESS: Yeah, the laptop.

18 MR. HICKEY: That's Exhibit 12.

19 THE WITNESS: Okay. Yes.

20 MR. HICKEY: That's what he's talking about.

21 THE WITNESS: Exhibit 12.

22 BY MR. FLORES:

23 Q I'm using those terms so it's clear on the record.

24 A Yes.

25 Q And when I'm answering his summary judgment

1 motion, I can refer to that.

2 A Yes.

3 Q Okay. And you may've answered this. After the
4 incident, did you have conversations with Linda Mason
5 about what occurred?

6 A No.

7 Q Other than Sheriff Burnett, you had no other
8 conversations?

9 A No.

10 Q Did you document this incident in any reports,
11 logs or anything?

12 A I didn't. No, sir.

13 Q Other than Mr. Hickey or any attorney from his
14 office, did you have any communications with the county
15 attorney in preparation for your testimony today?

16 A No, sir.

17 Q So as we're here today, are you aware of any
18 county commission, sheriff's office policies regarding or
19 governing public comments or the removal of attendees
20 from meetings?

21 A I'm not aware. I can't recall any. I don't know.

22 Q And I may've asked you this earlier, but I want to
23 be more specific, ask a more specific question.

24 From all your training as a law enforcement
25 officer, whether it's your base training at the academy,

1 your updates, review of department policies, meaning
2 sheriff's office policies, what training have you had on
3 handling disruptions, maintaining order and removing
4 individuals from public government meetings?

5 A I've never had to do that.

6 Q Ever?

7 A Ever.

8 Q What training have you had, though?

9 A To de-escalate the situation. I've been to
10 de-escalation, how to de-escalate the situation. And
11 that's what I was doing that time, getting him out of the
12 situation.

13 Q But you would agree with me that both parties are
14 arguing?

15 A They was.

16 Q You could've asked Ms. Mason to de-escalate and
17 calm down just as well as Mr. Morgan, right?

18 A My point then was to get Mr. Morgan away from her.
19 She still had the meeting to continue with. So if I got
20 him away from the scene, she would calm down.

21 Q Why not just tell Ms. Mason, "Hey, he's going to
22 calm down," or why not talk to him and allow him to
23 come -- you know, take a seat and remain?

24 A I didn't.

25 Q But why not?

1 A I can't answer that.

2 Q I know you said this was your first time, but have
3 you or anyone else from the sheriff's office previously
4 removed people from county commission meetings?

5 A I can't answer that. I don't know.

6 Q But you haven't, right?

7 A No.

8 Q What have you heard about any other persons being
9 removed or kicked out of commission meetings by Linda
10 Mason?

11 A I haven't.

12 Q Nothing? No scuttlebutt?

13 A I haven't heard anything.

14 Q We've gone over your understanding of freedom of
15 speech and assembly.

16 At that point did you believe that Mr. Mason was
17 violating the law or policy that would justify him being
18 removed?

19 MR. HICKEY: Mr. Morgan, not Mr. Mason.

20 Q Mr. Morgan. Excuse me.

21 A Now, say that again.

22 Q At any point did you believe during this encounter
23 that Mr. Morgan was violating any law or policies of
24 Marion County that would justify his removal?

25 MR. HICKEY: Object to the form.

1 A I don't know what policy pertaining to.

2 Q Okay. I'm just asking you your knowledge of any
3 policy, if you have any such knowledge.

4 A I didn't want it to go south. Okay? That's the
5 reason I acted. I did not want it to go south, to a
6 point where it got physical.

7 Q Okay. Did you inform Mr. Morgan why he was being
8 told to leave?

9 A I didn't. I told him outside that -- once I got
10 outside I said, "I didn't violate your First Amendment
11 rights, but Ms. Mason wanted you to leave." And that's
12 the reason I proceeded to tell him how to get back on the
13 agenda to speak at the next county commission meeting,
14 and he said he would.

15 Q And you weren't present at the June 24, 2024
16 meeting?

17 A No, sir, I wasn't.

18 Q Are you aware of any policies or procedures that
19 were updated or discussed following the January incident?

20 A I'm not aware.

21 Q Subsequent to the January incident, did you have
22 any involvement in discussions or decisions about
23 Mr. Morgan being added to or removed from the agenda --

24 A I didn't.

25 Q -- from future meetings?

1 A That's the first time I even laid eyes on
2 Mr. Morgan.

3 Q You've already answered a lot of my questions on
4 your interrogatories, so I'm not going to belabor that.

5 On your interrogatories, though, is there anything
6 that needs to be updated on them, such as persons that
7 were present during this incident with Mr. Morgan?

8 A Not that I'm aware of. It was inside the
9 commission meeting.

10 Q Just for the record, I'm going to show you what's
11 known as -- I'm going to show you a document that's
12 titled Defendant's Rule 26(A)(1) Initial Disclosures.

13 MR. FLORES: And it's got Defendant in the
14 singular possessive. So I'm assuming, Tom, this was for
15 all the defendants?

16 MR. HICKEY: It was.

17 MR. FLORES: Okay. If we could mark that as
18 [Exhibit 13](#), please.

19 ([Exhibit 13](#) was marked.)

20 BY MR. FLORES:

21 Q And this is, for the record -- because I do have a
22 couple more questions that arise from that.

23 So, taking a look at [Exhibit 13](#), this is what we
24 call initial disclosures. And it's your and the
25 defendants' initial disclosures. You've listed all the

1 witnesses that you believe were present that could
2 testify, in those initial disclosures. Is there anyone
3 else that needs to be added, once you've looked at that?

4 A Let me look at it. (Reviewing document.)

5 MR. HICKEY: Just for the record, this was --
6 I prepared this document. This was not something that
7 Mr. Winters prepared.

8 MR. FLORES: But it's a true --

9 MR. HICKEY: But if he has knowledge of other
10 folks, he can certainly tell you. That's fine.

11 BY MR. FLORES:

12 Q Okay. That's all I'm asking, deputy, is whether
13 or not anyone else needs to be added there.

14 A I wouldn't think so.

15 Q And, of course, I'm not going to ask you to
16 identify each and every person in the gallery. We're not
17 going to go there.

18 Other than the videos that I've showed you so far
19 as Exhibit 12, is there any other video or audio evidence
20 that you reviewed prior to today?

21 A No.

22 Q Okay.

23 A That's the only one I've seen.

24 Q Do you believe that your actions or the actions of
25 Linda Mason or the sheriff caused Mr. Morgan any harm at

1 all?

2 A Pardon?

3 Q Do you believe that either your actions, the
4 sheriff's actions, or Linda Mason's actions, or anyone
5 else, anyone else's actions against Mr. Morgan caused him
6 any harm or damages?

7 A Caused him any harm?

8 Q Yes, sir.

9 MR. HICKEY: Object to the form. Go ahead.

10 A No, sir, I don't.

11 Q You understand the concept of constitutional
12 injury?

13 A Uh-huh.

14 Q You do?

15 A Explain it. I mean, I know...

16 Q I'm just asking your understanding --

17 A No.

18 Q -- of constitutional injury. You don't
19 understand?

20 A No.

21 Q Are you making any claims or attributions that
22 someone other than you, the sheriff, Linda Mason, or the
23 county contributed to or caused any damages to the
24 plaintiff?

25 A No.

1 MR. HICKEY: Object to form.

2 MR. FLORES: Those are all my prepared
3 questions. I'm going to turn this back over to --

4 THE WITNESS: Can I use the bathroom?

5 MR. FLORES: Oh, yeah. Absolutely, sir.
6 That'll give me time to -- take your time.

7 (Recess from 11:01 to 11:05.)

8 BY MR. FLORES:

9 Q Deputy, we're going to start with Exhibit 12. And
10 I'm just going to walk you through these events. I'm
11 probably going to be behind you. I hate doing that. I
12 wish I had a remote volume.

13 A You're fine.

14 Q But we'll have to stop it at some point.

15 So, I'll get you right here. And we're going to
16 start at what I've marked as time-stamped 1 hour 50
17 minutes and 34 seconds. And this is the start of
18 plaintiff's interaction and address to the county
19 commission and his conversations with Linda Mason.

20 (Video plays.)

21 That's where, at approximately 1 hour 51 minutes
22 31 seconds, when Mr. Morgan -- it spoke for itself, but
23 when Mr. Morgan was asking about expenditure of funds on
24 the roads. This is where Ms. Mason says, "Look, buddy,
25 we're not going to go there."

1 At that point was Mr. Morgan being threatening,
2 raising his voice, acting in any kind of way to warrant
3 that kind of response from Ms. Mason, in your opinion?

4 MR. HICKEY: Object to the form.

5 A If you -- if I recall correctly, she'll say --

6 MR. HICKEY: Just go with that question, and
7 then --

8 A Okay. What was it again?

9 MR. HICKEY: -- he'll get to something later
10 on.

11 MR. FLORES: Could you read back my question,
12 please?

13 (Record read.)

14 MR. HICKEY: Object to the form.

15 A At that point in time, no.

16 (Video plays.)

17 Q At 1 hour 51 minutes and 39 seconds, you agree
18 with me that's where Mr. Morgan and Ms. Mason were having
19 a conversation about him having to go to the microphone,
20 correct?

21 A Yes.

22 Q And Mr. Morgan, as we heard, said "I can speak
23 loudly from here"?

24 A Yes.

25 Q Did it seem to you that he was being disorderly or

1 threatening at that point?

2 A He did not want to go to the mic.

3 Q Okay. But was he in any way at that point -- you
4 agree with me that he said, "Okay, I'll go to the mic,"
5 right?

6 A Yes.

7 Q But up until -- at any time during this brief
8 interchange that we're focusing on, was he acting
9 threatening, intimidating, acting as if he was going to
10 get out of hand and cause physical harm to anybody?

11 A That's when it started getting heated, yes.

12 Q You believe --

13 A That's when it started, the conversation between
14 the two started.

15 Q Okay. And you agree with me that Ms. Mason was
16 being just as heated as Mr. Morgan, wouldn't you?

17 A Both of them was, yes.

18 (Video plays.)

19 Q At 1 hour 52 minutes and 2 seconds, this is where,
20 would you agree with me, that Ms. Mason had interrupted
21 Mr. Morgan?

22 A Yes.

23 Q And Mr. Morgan was asking him, "Will you let me
24 speak?" -- or asking her?

25 A Yes.

1 (Video plays.)

2 Q Okay. From that point, the last time stamp we
3 had, up until 1 hour 52 minutes and 20 seconds, you agree
4 with me there was an incredibly -- there was a very brief
5 interaction between Mr. Morgan and Ms. Mason before she
6 said, you know -- sent the sheriff over there to get him
7 out of the commission meeting?

8 A There was interaction, yes.

9 Q Okay. And at this point what was Mr. Morgan doing
10 that would be threatening, you know, showing -- or
11 presenting himself as a threat to the safety of anyone in
12 this commission meeting?

13 A Mr. Morgan didn't want to be talked upon.

14 Q Okay. Fine.

15 A Ms. Mason didn't want to be talked upon.

16 Q Okay.

17 A So both of them was going at it, trying to outdo
18 the other.

19 Q Now, at the same time stamp that I just last
20 announced, looking at the people, these individuals that
21 are in the screenshot, does anyone appear to be concerned
22 or looked worried about their safety or that Mr. Morgan
23 would cause them harm?

24 MR. HICKEY: Object to the form.

25 A I can't say that they appeared to be harmed. I

1 can't say they couldn't be harmed. I don't, I don't
2 know.

3 Q I hear you. But you agree with me that just from
4 this still shot -- and we'll go through it further, no
5 one's, you know -- these other individuals, commissioner
6 looking -- one commissioner leaning back, looking to his
7 left, looking over, looks like, toward Mason; this fellow
8 on, looks like, a walker or whatever, in the blue shirt
9 is looking straight ahead at Ms. Mason, you would agree
10 with me that other than the dude in the orange hat, no
11 one's paying any attention to him, from this screenshot,
12 right?

13 MR. HICKEY: Object to form.

14 A From the screenshot.

15 Q Okay. And we're going to continue to play it and
16 see if anyone else focuses their attention on Mr. Morgan.
17 Starting back at 1 hour 52 minutes 20 seconds.

18 (Video plays.)

19 Okay. At 1 hour 52 minutes and 33 seconds, it was
20 only at this point when Mason directed the sheriff and
21 then asked you to come in and remove the plaintiff that
22 the man in the blue shirt looked over to see what was
23 going on, but everyone else -- the other individuals
24 hadn't really changed their position, right?

25 A You're correct.

1 Q And it was at this point when Mason told you to go
2 remove him, that's when you got involved, right?

3 A Yes.

4 Q Okay. Starting back at that same time stamp.

5 (Video plays.)

6 And that was Donald Leonard addressing the
7 commission, at 1 hour 52 minutes and 47 seconds,
8 expressing displeasure about people being removed about
9 questions to the commission, right, in general?

10 A I don't know who was speaking, but yes.

11 Q Okay. Well, it turned out to be Donald Leonard.

12 A Okay. Okay.

13 Q When Ms. Mason said, "You could be next," what was
14 the individual who was making those comments doing that
15 would present themselves as a threat?

16 A I don't recall what he was doing exactly.

17 Q All right. Because you were already going over
18 towards the door with the plaintiff, right?

19 A Yes.

20 (Video plays.)

21 Q Okay. So at approximately -- from the last time
22 stamp to 1 hour 52 minutes 59 seconds, Mason then, with
23 just a brief interaction with the speaker, as we
24 identified as Mr. Leonard, had him removed by the
25 sheriff?

1 A I wasn't in there at that time. I was outside.

2 Q All right. So the video is the best evidence of
3 this?

4 A Right.

5 Q And that Mr. Leonard, as we heard, said, "I don't
6 have to be removed, I'll walk out on my own"?

7 A Okay.

8 Q You agree with that --

9 A I do.

10 Q -- that's where that's said?

11 Starting back at the same time stamp.

12 (Video plays.)

13 At 1 hour 53 minutes and 23 seconds, do you agree
14 with me, between the last time stamp and this one now,
15 that Mr. Morgan was again addressing Linda Mason? If
16 we've got to go back to it, we can. Did you hear those
17 comments?

18 A Back it up a little.

19 Q I'm going to start at 1 hour 51 minutes and 42
20 seconds.

21 (Video plays.)

22 Let me stop you here, Deputy. The video
23 indicated, at the time stamp just -- it's at 1 hour 52
24 minutes and 35 seconds, you'd actually put your hand on
25 his back. Do I need to play that back for you?

1 A Yeah. Please, do.

2 MR. HICKEY: Object to form.

3 Q And the sheriff actually put his hand on him. So
4 let's go back to that.

5 MR. HICKEY: Object to the form.

6 (Video plays.)

7 Q Right here. Did you not see you put your right
8 hand onto Mr. Morgan?

9 A My right went up when he turned, yes.

10 Q Okay. That's at 1 hour 52 minutes and 34 seconds.

11 (Video plays.)

12 So that was at 1 hour 52 minutes 56 seconds.

13 Ms. Mason was directing the sheriff to remove who we've
14 identified as Mr. Leonard. Were you present for that?

15 A I may've been in there but I don't recall.

16 Q You don't recall? Okay.

17 (Video plays.)

18 Q Okay. At 1 hour 53 minutes and 11 seconds,
19 Mr. Morgan is speaking. That was Mr. Morgan. That was
20 his voice.

21 (Video plays.)

22 Okay. At 1 hour 53 minutes and 22 seconds,
23 Ms. Mason is directing "This man needs to leave right
24 now." That was the plaintiff, wasn't it, Mr. Morgan?

25 A That's what it sounded like.

1 Q And was that directed toward you, because you were
2 up there with Mr. Morgan?

3 A I was with him.

4 Q And did you take it that that was a command from
5 Ms. Mason to remove the plaintiff from the building?

6 A She said, "He needs to be removed."

7 Q Okay. And you took him out of the building,
8 didn't you?

9 A I walked with him, yes.

10 Q But he didn't have any choice but to leave at this
11 point, right?

12 A True.

13 (Video plays.)

14 Q From the last time stamp until 1 hour 54 minutes
15 and 3 seconds, Mason was reading from the agenda, which
16 is [Exhibit 11](#), as we understand it. And if you look at
17 [Exhibit 11](#), which is in front of you, sir, item number 17
18 was Donald Leonard, correct?

19 A Correct.

20 Q And yet Ms. Mason ordered that Mr. Leonard would
21 leave -- had to leave the meeting, correct? We heard
22 that on the --

23 A Yes.

24 Q -- video.

25 A Yes.

1 Q And he elected to leave himself rather than to
2 face -- or to be removed in the manner that Mr. Morgan
3 was removed. Would you agree with me?

4 A Yes.

5 Q So, at this point, what was Mr. -- when
6 Mr. Mason -- Mr. Morgan was up there with you, at the
7 door to the commission meeting room, what crimes had
8 Mr. Morgan committed?

9 A What crime?

10 Q Yeah. What crimes?

11 A The only thing I could see that he'd committed at
12 that point in time was disorderly.

13 Q But you would agree with me that both he and
14 Ms. Mason were equally arguing with one another?

15 A They was. Yes, they was.

16 Q So Ms. Mason was also -- did you believe that you
17 would've had enough probable cause to charge her with
18 disorderly conduct as well?

19 A I didn't charge neither one of them.

20 Q But was there probable cause there for you to make
21 such an arrest on both of them?

22 A Could be, yes.

23 Q "Could be" is not a yes or no, sir.

24 A I said could be, yes.

25 Q All right. Do you believe, as you sit here today

1 as a regular citizen, that Ms. Mason's conduct as a
2 commission meeting member -- the chairman of the
3 commission was appropriate under these circumstances?

4 A Yes.

5 MR. HICKEY: Object to form.

6 Q You believe she was acting appropriately?

7 A Yes.

8 Q You realize that she gave -- that the interaction
9 with Mr. Morgan was just a matter of seconds before she
10 made the decision to have him removed, right?

11 A True, yes.

12 Q Why not just, you know, have him -- why not just,
13 you and the sheriff, or just you, tell him, "Hey, dude,
14 calm down. Just have a seat and we'll deal with this
15 later"? Why didn't you do that?

16 MR. HICKEY: Object to the form.

17 A I don't know.

18 MR. FLORES: I think I'm about done. Let met
19 just look at a few things here.

20 MR. HICKEY: You need a minute, or are we
21 okay just to sit?

22 MR. FLORES: No, we're good.

23 BY MR. FLORES:

24 Q On your interrogatories -- take a look at them
25 again. I think I've already asked you this. Take a look

1 at them. And I'm not too worried about your request for
2 production. You said you didn't have a lot of this
3 stuff. But on the interrogatories, take a look at them
4 and tell me if there's anything that you need to be --
5 that needs to be updated or anything that you want to
6 change, that we need to change or update or modify. And
7 again, please take your time.

8 A (Reviewing document.) No.

9 MR. FLORES: Very good. Well, Deputy, thank
10 you for your patience and your time. That's all I have.

11 (Signature not discussed.)

12 DEPOSITION CONCLUDED AT 11:28

13

14

15

16

17

18

19

20

21

22

23

24

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

REPORTER'S CERTIFICATE

STATE OF TENNESSEE:

COUNTY OF HAMILTON:

I, Sheila D. Wilson, Licensed Court Reporter #268 and Notary Public, in and for the State of Tennessee, do hereby certify that the deposition of DEPUTY DALE WINTERS was reported by me in machine shorthand, and that the foregoing 89 pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting, as evidenced by the LCR number and expiration date following my name below.

In witness whereof, I have hereunto set my hand this 20th day of October 2025.



Sheila D. Wilson, LCR #268
Expiration date: 6/30/2026.
Notary Public Commission
Expires: 1/17/2027.

	40:20	14:19,22,24;15:7;	assigned (2)	28:11
#	addressing (8)	21:21,22;22:12,12,16,	35:19,24	Battery (3)
#268 (1)	37:6,8;38:9,23;	17,21;23:20,25;	assisted (1)	5:20,25;6:8
4:6	45:1;66:9;83:6;84:15	25:23;30:3,9;32:2,7;	69:2	BCs (1)
[administrator (4)	65:18,20;74:10	assume (1)	6:8
	63:1,10,19,20	angry (2)	16:5	bear (1)
	advise (1)	61:20,23	assuming (3)	5:9
[sic] (1)	62:5	announced (1)	47:13;62:25;75:14	Beard (5)
6:4	affected (1)	81:20	attend (4)	37:3,8;39:19,20,20
A	62:10	answered (5)	16:24;33:21;43:2,3	bears (1)
	afterward (1)	37:17;66:23;68:11;	attended (3)	9:16
	43:3	71:3;75:3	13:4;43:2;59:5	become (1)
	afterwards (1)	anticipate (1)	attendees (1)	11:24
Abd (1)	63:22	7:10	71:19	bed (1)
18:16	again (12)	apparently (1)	attention (7)	63:12
ability (1)	20:12;23:18;35:2;	65:1	40:13;50:7,9,10,13;	beginning (1)
90:7	45:20;48:22;50:4;	appear (4)	82:11,16	4:3
able (2)	65:25;73:21;79:8;	61:19,22;62:1;	attorney (4)	begins (1)
18:3,7	84:15;88:25;89:7	81:21	7:5;45:16;71:13,15	48:9
above (4)	against (2)	appeared (2)	attributions (1)	behalf (1)
32:22;52:23;53:1;	57:9;77:5	43:5;81:25	77:21	4:2
63:23	agencies (3)	application (1)	audio (2)	behind (11)
Absolutely (1)	12:9;19:5;30:2	18:13	41:8;76:19	38:16,17,17,18,19;
78:5	Agency (12)	applied (1)	audit (1)	39:10;49:18;64:25;
academies (1)	3:8,9,11,13,16,18;	18:10	47:19	67:16,17;78:11
13:3	14:6;16:6,7;20:9,10;	applies (2)	authority (6)	belabor (1)
academy (11)	22:6	14:22;15:20	53:6;55:24;56:3;	75:4
12:25;13:2,12,25;	agenda (14)	approach (3)	59:17;61:6,9	below (1)
14:3,12;15:16,22;	34:2,3,4,7;35:5;	23:10;25:5;64:19	aware (7)	90:11
22:11;23:12;71:25	37:24,25;41:24;	approached (1)	25:2;47:18;71:17,	Ben (2)
accepted (1)	65:25;66:3;69:13;	68:23	21;74:18,20;75:8	63:7,15
18:9	74:13,23;86:15	appropriate (3)	away (3)	beside (1)
accomplish (1)	agitated (2)	47:4,8;88:3	38:8;72:18,20	40:18
29:4	43:6,10	appropriately (1)		Besides (1)
acronym (1)	ago (2)	88:6	B	69:4
12:1	16:2;42:9	approximately (6)		best (1)
act (3)	agree (21)	4:3;17:14;20:18,23;	back (44)	84:2
10:17,20;23:4	27:6;28:1,16;29:3;	78:21;83:21	5:10;13:10,10;14:9;	better (4)
acted (2)	38:7;41:7;46:8,17;	area (1)	18:2;19:19,20;20:14,	13:9;21:7;30:6;
55:24;74:5	54:4;72:13;79:17;	40:7	22;22:1;27:4;29:15;	41:9
acting (6)	80:4,15,20;81:3;82:3,	arguing (6)	36:13,17,17;38:12,15,	Billy (5)
56:3;64:9;79:2;	9;84:8,13;87:3,13	43:12,12,13;48:11;	15:41;15:43;12:44;2;	45:18;47:21,23;
80:8,9;88:6	ahead (9)	72:14;87:14	47:3;48:4,9;49:15;	58:25;66:15
action (3)	6:11,25;7:1,13;9:2;	arise (1)	55:5;65:11,24;66:3,6,	bit (1)
57:8;62:3,13	10:23;34:14;77:9;	75:22	7:67:19;74:12;78:3;	60:10
actions (8)	82:9	armory (1)	79:11;82:6,17;83:4;	black (1)
59:18;64:16;76:24,	ain't (1)	6:9	84:11,16,18,25,25;	63:8
24;77:3,4,4,5	37:25	around (7)	85:4	blocks (1)
actual (2)	Alabama (35)	11:24;28:19;36:18;	bad (1)	63:5
33:3;41:8	11:21;12:6,7,9,11;	57:3,3;66:6;67:16	60:15	Blow (1)
actually (3)	13:2,5,14,22,24;14:2,	arrest (3)	badge (2)	28:25
53:6;84:24;85:3	9,13;15:16,23;16:4,6,	42:12;63:16;87:21	12:23,24	blows (1)
add (1)	8,15,15,20,23;17:21,	arrests (1)	base (1)	28:5
29:4	23,25;18:8,10,11,13;	31:24	71:25	blue (2)
added (3)	19:9;22:11;23:11,12,	articulable (1)	based (1)	82:8,22
74:23;76:3,13	13;30:1	25:11	34:1	blurb (1)
address (4)	allow (1)	aside (1)	basically (1)	43:18
18:20;37:16;60:23;	72:22	35:14	14:25	Board (2)
78:18	allows (1)	assemble (3)	basis (2)	3:4;90:10
addressed (5)	25:4	15:3,11,24	16:10;42:12	Both (7)
17:3;37:16;51:20;	along (2)	assembly (8)	bathroom (1)	43:7;62:2;72:13;
52:13;64:19	59:21;62:20	15:6,7,17,21;16:17;	78:4	80:17;81:17;87:13,21
addresses (1)	Amendment (21)	17:4;22:4;73:15	batons (1)	bouncing (1)

<p>14:9 branch (6) 54:1,1,2,5,10,13 branches (3) 53:21,24,24 Brandt (4) 45:5,20,21,22 Brandt's (1) 45:25 break (3) 7:12;20:2;44:11 brief (3) 80:7;81:4;83:23 brigade (1) 6:9 bring (3) 43:4;52:23;53:1 brought (1) 23:23 Brown (1) 38:25 buddy (3) 51:16;52:7;78:24 building (10) 56:14;57:4,17;58:3, 9;69:11,11,14;86:5,7 Burnett (2) 69:2;71:7 Burrows (2) 63:2,21 business (2) 39:22;40:6</p>	<p>Canales (2) 63:7,15 capacity (1) 11:5 career (1) 13:10 Carolina (1) 13:11 carries (1) 60:2 cars (1) 31:8 case (7) 3:14,15,19;25:22; 69:20,23;90:9 cases (1) 23:23 cause (4) 80:10;81:23;87:17, 20 caused (4) 76:25;77:5,7,23 central (3) 13:2,6,12 certain (2) 44:20;59:4 certainly (1) 76:10 CERTIFICATE (1) 90:1 certification (2) 13:1,17 certified (7) 11:17,20,21,24; 12:20,21;17:2 certify (1) 90:5 chair (1) 27:7 chairman (3) 45:22;46:1;88:2 chairperson (10) 37:20;38:24;41:19; 47:10,12;53:8,14; 54:8,12;61:11 challenge (1) 14:2 challenged (3) 11:23;13:16,19 change (3) 20:6;89:6,6 changed (1) 82:24 characterize (1) 43:25 charge (6) 3:18;53:7;54:9; 55:2;87:17,19 chase (1) 24:24 Chattanooga (3) 4:5;6:5,6 chief (15)</p>	<p>19:18,20,22;20:14, 16;21:1,11;30:14,17, 21;32:13,17;47:23; 59:1;63:2 chief's (1) 21:3 choice (2) 6:4;86:10 Christopher (1) 6:13 circumstances (3) 25:16;28:23;88:3 citizen (10) 10:10,11,16;11:6; 28:25;29:18;35:16; 42:5;46:17;88:1 citizens (3) 14:14;16:16;46:8 city (15) 12:12;14:8;16:24; 18:25;47:15,18; 53:25;55:11;58:17; 59:5,9,12;63:1,9,20 Civil (1) 4:8 claims (1) 77:21 clarity (1) 60:20 class (1) 6:17 clause (1) 30:3 clauses (1) 22:22 clear (4) 68:12,22,22;70:23 Close (2) 17:19;49:11 Closer (1) 6:6 coconut (1) 26:16 coercive (2) 28:19;29:4 comfortable (1) 8:14 coming (1) 29:12 command (1) 86:4 commands (2) 27:22;28:18 comment (2) 36:10;40:24 comments (4) 36:15;71:19;83:14; 84:17 commission (56) 10:9;12:5;16:24; 20:7;26:20,21,22; 33:16,18;35:5,25; 36:11;37:7,16,19;</p>	<p>39:22;40:10;41:18; 42:19;43:16,20;44:5; 45:7,23;46:19;47:10; 50:11;53:15;54:4; 55:25;56:18,20,23; 57:25;59:21,24;61:8, 12;65:15;66:6,7;68:5; 69:3;71:18;73:4,9; 74:13;75:9;78:19; 81:7,12;83:7,9;87:7; 88:2,3 commissioner (7) 43:17;46:19;47:10, 11;63:18;82:5,6 commissioners (4) 38:8,23;41:21;61:1 commit (1) 23:5 committed (6) 10:19;22:18,20; 24:19;87:8,11 communicate (1) 69:10 communications (1) 71:14 complaint (2) 33:1;44:14 complaints (1) 32:6 completed (1) 33:6 compliance (1) 28:17 comptroller (1) 47:20 concept (6) 15:19;25:11;30:2,9; 53:20;77:11 concern (1) 59:20 concerned (2) 62:10;81:21 CONCLUDED (1) 89:12 conduct (3) 39:22;87:18;88:1 conducted (2) 61:12;62:16 conducts (1) 41:19 confronted (1) 40:1 confusion (1) 35:11 consider (1) 64:8 constitute (1) 25:24 Constitution (5) 14:23,24;15:8; 22:13;55:1 constitutional (5) 14:14;54:22,25;</p>	<p>77:11,18 consult (2) 7:5;60:25 consultation (1) 61:4 contact (3) 65:22;66:24;67:2 contacted (1) 3:9 continue (8) 7:1;38:11,22;39:16; 40:16;65:13;72:19; 82:15 Continued (2) 16:11;40:9 continuing (3) 16:10,14;21:20 continuum (1) 27:17 contract (1) 3:12 contract/agreement (1) 3:13 contractor (1) 3:7 contributed (1) 77:23 control (4) 23:3;52:1,2;55:6 controls (1) 41:24 conversation (3) 8:8;79:19;80:13 conversations (6) 66:8,11,14;71:4,8; 78:19 copy (1) 9:18 correcting (1) 30:19 correctly (4) 35:17;48:8;55:4; 79:5 council (2) 34:19,22 counsel (2) 3:15;90:8 COUNTY (50) 3:2;6:15,17;8:19, 21;11:3;16:19,20,24; 20:19,21;21:4;22:7; 23:14;29:2;32:16; 35:24;39:1;41:18; 42:19;43:17,20; 45:16;46:19;47:14; 50:10;53:8,15,16,25; 54:4,5,10,14,14,16, 23;59:9,10;61:1,11; 69:13;71:14,18;73:4, 24;74:13;77:23; 78:18;90:3 couple (2) 68:11;75:22</p>
C				
<p>call (8) 31:20;37:3;51:14; 63:12,13;66:3;69:12; 75:24 called (5) 5:2;36:16;50:18,21; 60:19 calling (1) 37:23 calls (1) 31:21 calm (5) 62:6;72:17,20,22; 88:14 came (6) 6:5;11:22;17:1; 19:2;43:17;70:6 can (32) 10:23;11:2,2,25; 20:15;23:10;24:23; 25:8,19;27:24;29:14; 30:25;33:8;34:8,12; 35:14;36:9;37:13; 40:4,7;44:10,15; 46:24;51:7;62:21; 64:16;65:25;71:1; 76:10;78:4;79:22; 84:16</p>	<p>certified (7) 11:17,20,21,24; 12:20,21;17:2 certify (1) 90:5 chair (1) 27:7 chairman (3) 45:22;46:1;88:2 chairperson (10) 37:20;38:24;41:19; 47:10,12;53:8,14; 54:8,12;61:11 challenge (1) 14:2 challenged (3) 11:23;13:16,19 change (3) 20:6;89:6,6 changed (1) 82:24 characterize (1) 43:25 charge (6) 3:18;53:7;54:9; 55:2;87:17,19 chase (1) 24:24 Chattanooga (3) 4:5;6:5,6 chief (15)</p>	<p>19:18,20,22;20:14, 16;21:1,11;30:14,17, 21;32:13,17;47:23; 59:1;63:2 chief's (1) 21:3 choice (2) 6:4;86:10 Christopher (1) 6:13 circumstances (3) 25:16;28:23;88:3 citizen (10) 10:10,11,16;11:6; 28:25;29:18;35:16; 42:5;46:17;88:1 citizens (3) 14:14;16:16;46:8 city (15) 12:12;14:8;16:24; 18:25;47:15,18; 53:25;55:11;58:17; 59:5,9,12;63:1,9,20 Civil (1) 4:8 claims (1) 77:21 clarity (1) 60:20 class (1) 6:17 clause (1) 30:3 clauses (1) 22:22 clear (4) 68:12,22,22;70:23 Close (2) 17:19;49:11 Closer (1) 6:6 coconut (1) 26:16 coercive (2) 28:19;29:4 comfortable (1) 8:14 coming (1) 29:12 command (1) 86:4 commands (2) 27:22;28:18 comment (2) 36:10;40:24 comments (4) 36:15;71:19;83:14; 84:17 commission (56) 10:9;12:5;16:24; 20:7;26:20,21,22; 33:16,18;35:5,25; 36:11;37:7,16,19;</p>	<p>39:22;40:10;41:18; 42:19;43:16,20;44:5; 45:7,23;46:19;47:10; 50:11;53:15;54:4; 55:25;56:18,20,23; 57:25;59:21,24;61:8, 12;65:15;66:6,7;68:5; 69:3;71:18;73:4,9; 74:13;75:9;78:19; 81:7,12;83:7,9;87:7; 88:2,3 commissioner (7) 43:17;46:19;47:10, 11;63:18;82:5,6 commissioners (4) 38:8,23;41:21;61:1 commit (1) 23:5 committed (6) 10:19;22:18,20; 24:19;87:8,11 communicate (1) 69:10 communications (1) 71:14 complaint (2) 33:1;44:14 complaints (1) 32:6 completed (1) 33:6 compliance (1) 28:17 comptroller (1) 47:20 concept (6) 15:19;25:11;30:2,9; 53:20;77:11 concern (1) 59:20 concerned (2) 62:10;81:21 CONCLUDED (1) 89:12 conduct (3) 39:22;87:18;88:1 conducted (2) 61:12;62:16 conducts (1) 41:19 confronted (1) 40:1 confusion (1) 35:11 consider (1) 64:8 constitute (1) 25:24 Constitution (5) 14:23,24;15:8; 22:13;55:1 constitutional (5) 14:14;54:22,25;</p>	<p>77:11,18 consult (2) 7:5;60:25 consultation (1) 61:4 contact (3) 65:22;66:24;67:2 contacted (1) 3:9 continue (8) 7:1;38:11,22;39:16; 40:16;65:13;72:19; 82:15 Continued (2) 16:11;40:9 continuing (3) 16:10,14;21:20 continuum (1) 27:17 contract (1) 3:12 contract/agreement (1) 3:13 contractor (1) 3:7 contributed (1) 77:23 control (4) 23:3;52:1,2;55:6 controls (1) 41:24 conversation (3) 8:8;79:19;80:13 conversations (6) 66:8,11,14;71:4,8; 78:19 copy (1) 9:18 correcting (1) 30:19 correctly (4) 35:17;48:8;55:4; 79:5 council (2) 34:19,22 counsel (2) 3:15;90:8 COUNTY (50) 3:2;6:15,17;8:19, 21;11:3;16:19,20,24; 20:19,21;21:4;22:7; 23:14;29:2;32:16; 35:24;39:1;41:18; 42:19;43:17,20; 45:16;46:19;47:14; 50:10;53:8,15,16,25; 54:4,5,10,14,14,16, 23;59:9,10;61:1,11; 69:13;71:14,18;73:4, 24;74:13;77:23; 78:18;90:3 couple (2) 68:11;75:22</p>

<p>course (2) 11:15;76:15</p> <p>courses (1) 21:25</p> <p>Court (16) 3:4,6,9;4:6;7:14; 23:16,21,23;24:1,14, 23;25:3;42:9;54:17; 90:4,10</p> <p>cover (1) 3:16</p> <p>covered (1) 22:5</p> <p>covers (1) 8:4</p> <p>crime (5) 10:19;22:18,19; 23:5;87:9</p> <p>crimes (2) 87:7,10</p> <p>criminal (1) 10:17</p> <p>crossing (1) 37:15</p> <p>crowd (1) 51:13</p> <p>cuffs (1) 25:20</p> <p>Curiosity (1) 18:6</p> <p>current (2) 6:14;8:19</p> <p>custody (1) 27:18</p> <p>customary (1) 3:19</p> <p>cutting (1) 48:24</p>	<p>decisions (4) 23:16,21;24:23; 74:22</p> <p>deescalate (3) 52:22;62:3,4</p> <p>de-escalate (3) 72:9,10,16</p> <p>de-escalation (1) 72:10</p> <p>Defendant (2) 9:3;75:13</p> <p>defendants (1) 75:15</p> <p>defendants' (1) 75:25</p> <p>Defendant's (1) 75:12</p> <p>delinquished (1) 6:4</p> <p>Department (9) 6:16;12:12;13:13; 19:12;20:20,21; 21:10;47:24;72:1</p> <p>departments (1) 13:4</p> <p>depends (5) 25:16;28:22,23; 31:19;33:22</p> <p>deposition (12) 3:10,11,17;4:1,7; 5:12;6:18;11:25; 13:20;69:17;89:12; 90:5</p> <p>deputies (1) 59:10</p> <p>DEPUTY (19) 4:1;5:1,7;6:17; 10:12,21;11:3,9;21:4; 32:15;33:16;34:17; 35:4;44:13,25;76:12; 78:9;84:22;89:9</p> <p>derogatory (1) 15:13</p> <p>describe (3) 11:2;36:9;64:16</p> <p>describing (1) 48:4</p> <p>detain (5) 23:6;24:24;25:4; 26:1,4</p> <p>detaining (2) 25:10;26:8</p> <p>differently (1) 52:13</p> <p>directed (3) 66:2;82:20;86:1</p> <p>directing (2) 85:13,23</p> <p>direction (1) 57:8</p> <p>directly (1) 69:10</p> <p>discipline (5)</p>	<p>30:16,23;31:1,23; 32:1</p> <p>disciplined (1) 21:10</p> <p>disclosure (1) 3:5</p> <p>Disclosures (4) 75:12,24,25;76:2</p> <p>discount (1) 3:20</p> <p>discourse (2) 7:16;8:7</p> <p>discovery (1) 9:25</p> <p>discuss (3) 41:22;48:9;64:5</p> <p>discussed (3) 4:9;74:19;89:11</p> <p>discussion (3) 37:22;41:21;46:1</p> <p>discussions (2) 66:18;74:22</p> <p>disorderly (3) 79:25;87:12,18</p> <p>dispatcher (1) 12:16</p> <p>displeasure (4) 48:21,24;49:3;83:8</p> <p>dispute (1) 26:24</p> <p>disruptions (1) 72:3</p> <p>document (9) 9:15,21,22;10:1; 71:10;75:11;76:4,6; 89:8</p> <p>documents (4) 7:22,25;69:16,18</p> <p>Donald (5) 37:2;57:9;83:6,11; 86:18</p> <p>done (5) 8:9;9:21;16:19; 24:17;88:18</p> <p>door (8) 25:19;56:8,18,19; 57:1;65:16;83:18; 87:7</p> <p>doubt (1) 9:24</p> <p>down (15) 7:14,15,15;13:7; 25:20;48:17;52:23; 53:1;62:6;63:14; 68:20;72:17,20,22; 88:14</p> <p>drive (1) 44:6</p> <p>driver (1) 6:8</p> <p>driving (1) 63:9</p> <p>dude (3)</p>	<p>49:9;82:10;88:13</p> <p>due (4) 30:3,6,9;33:5</p> <p>during (8) 16:14;21:9,19; 31:19;36:10;73:22; 75:7;80:7</p> <p>duties (3) 11:8;23:17;35:19</p> <p>duty (2) 10:20;35:24</p>	<p>engagement (1) 60:24</p> <p>enough (2) 47:9;87:17</p> <p>entire (2) 44:5;60:22</p> <p>equally (1) 87:14</p> <p>escort (3) 51:9;56:8;67:24</p> <p>escorted (1) 67:23</p> <p>even (6) 6:20;31:20;33:20; 37:25;69:21;75:1</p> <p>evening (1) 41:18</p> <p>event (5) 43:23;54:9;66:11, 14,17</p> <p>events (2) 48:5;78:10</p> <p>everybody (7) 13:12;39:6,12,17, 21;40:7;63:24</p> <p>everybody's (4) 50:7,8,10,13</p> <p>everyone (1) 82:23</p> <p>evidence (3) 41:9;76:19;84:2</p> <p>evidenced (1) 90:10</p> <p>exact (3) 34:1;51:11;56:15</p> <p>exactly (3) 37:22;64:16;83:16</p> <p>exam (1) 19:3</p> <p>EXAMINATION (1) 5:5</p> <p>examined (1) 5:3</p> <p>example (2) 31:13;64:1</p> <p>examples (2) 26:3;31:1</p> <p>excessive (1) 32:6</p> <p>exchange (1) 50:3</p> <p>exchanged (1) 51:8</p> <p>exchanges (1) 63:21</p> <p>excuse (2) 22:2;73:20</p> <p>executive (2) 54:1,13</p> <p>exhibit (27) 9:5,6,9,16;34:8,10, 15;35:3,4,6,7;38:1; 44:6,7;49:7;55:20;</p>
D			E	
<p>DALE (4) 4:1;5:1,6;13;9:3</p> <p>damages (2) 77:6,23</p> <p>data (1) 34:1</p> <p>date (4) 33:3,9,12;90:20</p> <p>dates (1) 33:10</p> <p>day (9) 18:21,23;21:19; 28:9;33:21;36:6; 59:19;61:8;90:12</p> <p>deal (1) 88:14</p> <p>dealing (1) 22:22</p> <p>dealings (1) 57:21</p> <p>decision (4) 24:1,15;25:3;88:10</p>			<p>earlier (1) 71:22</p> <p>early (1) 5:8</p> <p>education (3) 16:11,14;21:20</p> <p>effect (4) 28:19;29:4;51:17; 62:6</p> <p>either (4) 27:8;33:9;62:16; 77:3</p> <p>elaborate (1) 62:23</p> <p>elected (2) 62:17;87:1</p> <p>eligible (1) 14:2</p> <p>else (22) 8:6;18:6;29:3;30:8; 39:17;46:24;56:1; 57:8,10;58:13;63:24; 64:5;66:9;67:17;70:7, 7;73:3;76:3,13;77:5; 82:16,23</p> <p>else's (1) 77:5</p> <p>employed (3) 6:15;19:5;55:18</p> <p>employee (1) 90:8</p> <p>employees (1) 47:20</p> <p>employment (2) 12:13,15</p> <p>encounter (3) 26:10;60:22;73:22</p> <p>end (2) 31:17;60:23</p> <p>enforce (1) 10:19</p> <p>enforcement (14) 8:24,25;13:25; 26:13;36:3;42:3; 52:20,22;53:2;55:14; 60:25;62:15;69:5; 71:24</p> <p>engaged (1) 63:3</p>	

68:13;70:13,18,21; 75:18,19,23;76:19; 78:9;86:16,17 expenditure (1) 78:23 Expiration (1) 90:20 Expires (1) 90:21 explain (4) 29:9;51:7;55:23; 77:15 expressed (2) 48:20;59:16 expressing (3) 48:23;49:2;83:8 eyeball (1) 9:14 eyes (2) 36:14;75:1	64:18 finished (3) 60:7,7,11 firearm (1) 28:13 first (23) 5:3,11;14:19,22,24; 15:7;21:21;23:20; 29:9;30:17;32:2,6; 38:6;50:22;51:3; 65:18,20,24;67:12; 68:23;73:2;74:10; 75:1 five (1) 20:13 fixed (1) 37:14 fixing (1) 60:3 flagpole (1) 6:6 flash (1) 44:6 FLORES (37) 5:6,15;9:2;11:10, 13;33;2,7,11,15;34:6, 11,14,16;35:2;44:4,9, 11,13,19,24;53:12; 68:17,21;70:22; 75:13,17,20;76:8,11; 78:2,5,8;79:11;88:18, 22,23;89:9 focus (2) 32:23;50:13 focuses (1) 82:16 focusing (2) 48:1;80:8 folks (2) 8:8;76:10 follow (4) 46:3,5,22;48:2 following (3) 3:4;46:20;74:19 follows (1) 5:4 foot (7) 29:16;38:21;60:4,9, 12;64:23,24 force (6) 27:13,15,17,21; 28:13;32:6 foregoing (1) 90:6 forget (1) 53:4 form (29) 10:15,22;24:25; 25:7;26:25;27:10; 28:21;29:7;39:13,15; 42:24;46:11;47:6; 53:10,17;54:11; 56:22;68:10;73:25;	77:9;78:1;79:4,14; 81:24;82:13;85:2,5; 88:5,16 formal (2) 5:14;6:11 former (1) 52:19 forth (2) 41:15;48:9 forum (1) 65:15 forward (1) 40:3 four (3) 17:14;19:17;20:13 fourth (10) 9:13;21:22;22:12, 12,15,17,21;23:25; 25:23;68:18 frames (2) 20:15;55:16 free (3) 14:18,18,21 freedom (12) 15:7,17,21,21,23, 24;16:17,17;17:4,4; 22:4;73:14 freewill (2) 56:9;67:25 frisks (2) 24:10;25:9 front (5) 49:13,14;63:7; 69:25;86:17 full (2) 6:12;8:18 funds (1) 78:23 funny (1) 46:10 further (2) 24:21;82:4 future (1) 74:25	3:20;5:12;6:18; 49:24 giving (1) 28:17 goes (8) 6:7;31:19;39:21; 41:24;48:7,8,8;57:1 Good (5) 5:7;8:17;25:14; 88:22;89:9 gotcha (3) 7:17,20;43:23 governing (1) 71:19 government (7) 15:20;53:21,23,24; 54:5,14;72:4 grab (1) 67:20 grabbing (1) 27:25 grasp (1) 13:9 grounds (1) 42:6 group (1) 15:11 Guard (1) 5:18 guess (1) 37:24 guide (2) 23:16,21 guided (1) 66:2 gun (2) 12:23,24 gunshots (1) 37:13 guy (1) 37:6	happening (1) 15:13 hard (1) 28:4 harm (5) 76:25;77:6,7;80:10; 81:23 harmed (2) 81:25;82:1 hat (1) 82:10 hate (1) 78:11 head (4) 42:19;53:15;54:9, 13 headquarters (1) 6:8 hear (12) 39:7,12;40:4,7,19; 44:15;46:5;49:5,24; 50:6;82:3;84:16 heard (7) 38:18;46:2;73:8,13; 79:22;84:5;86:21 hearing (3) 30:7;36:17;42:22 heated (3) 63:21;80:11,16 held (1) 33:18 help (3) 45:12;48:13;60:16 hereby (1) 90:5 Here's (1) 65:21 hey (4) 7:4;62:5;72:21; 88:13 Hickey (57) 6:23;7:6;10:15,22; 11:7,11;24:25;25:7; 26:25;27:10;28:21; 29:7;33:4,8,13;34:10, 12;39:13,15;42:24; 44:8,10,20;46:11,23; 47:6;53:10,17;54:11; 56:22;60:8;64:13; 68:10,15;70:6,15,18, 20;71:13;73:19,25; 75:16;76:5,9;77:9; 78:1;79:4,6,9,14; 81:24;82:13;85:2,5; 88:5,16,20 High (1) 6:17 higher (1) 42:11 highway (1) 13:13 himself (2) 81:11;87:1	
F					
face (1) 87:2 fair (4) 14:10;17:18;42:21; 47:9 fairly (1) 6:21 familiar (3) 6:10;27:13;53:20 far (4) 37:13;52:25;53:22; 76:18 Federal (1) 4:8 feel (3) 8:14,17;62:18 feet (5) 38:8,17,19,22; 39:11 fellow (2) 37:2;82:7 felt (1) 60:3 few (3) 5:8;26:18;88:19 field (1) 49:9 fighting (1) 42:11 file (2) 69:20,23 financial (1) 3:20 fine (4) 33:9;76:10;78:13; 81:14 finger (1) 52:6 finish (4) 8:10;43:20;44:5;					
		G			
		Gallagher (2) 45:18;66:15 gallery (2) 51:14;76:16 gave (2) 18:10;88:8 gavel (1) 46:2 general (4) 5:11;14:18;61:6; 83:9 generally (1) 49:19 gentleman (3) 36:18,22;40:18 given (4)			
			H		
			HAMILTON (3) 3:2;32:16;90:3 hand (13) 15:2,4;26:17;29:20; 60:3;65:9,10,22; 80:10;84:24;85:3,8; 90:12 handle (1) 60:15 handling (1) 72:3 hands (5) 27:11;28:4;65:2,5,7 handshake (1) 66:24 happen (2) 25:17;67:8 happened (1) 36:21		

<p>hire (1) 14:6</p> <p>hissself (3) 28:23;59:22;60:15</p> <p>hit (1) 11:16</p> <p>hold (1) 61:9</p> <p>holding (1) 10:12</p> <p>holds (1) 41:19</p> <p>Holly (1) 63:6</p> <p>home (2) 18:2;63:12</p> <p>honcho (1) 53:15</p> <p>honest (1) 36:8</p> <p>hospital (1) 63:7</p> <p>hour (19) 44:25;45:15;78:16, 21;79:17;80:19;81:3; 82:17,19;83:7,22; 84:13,19,23;85:10,12, 18,22;86:14</p> <p>hours (2) 7:11;49:8</p> <p>husband (1) 47:21</p>	<p>28:19</p> <p>incredibly (1) 81:4</p> <p>independent (1) 3:7</p> <p>indicated (1) 84:23</p> <p>indicating (1) 45:3</p> <p>individual (4) 28:19,20,22;83:14</p> <p>individually (1) 52:25</p> <p>individuals (6) 30:25;32:2;72:4; 81:20;82:5,23</p> <p>inflict (1) 28:5</p> <p>inform (1) 74:7</p> <p>informal (1) 6:21</p> <p>infractions (1) 31:1</p> <p>Initial (4) 75:12,24,25;76:2</p> <p>initially (1) 50:16</p> <p>initiative (1) 60:17</p> <p>injury (2) 77:12,18</p> <p>ink (1) 52:5</p> <p>inservice (1) 22:5</p> <p>inside (1) 75:8</p> <p>instance (2) 5:2;29:12</p> <p>instances (1) 58:16</p> <p>instruct (2) 57:12,16</p> <p>instructed (1) 51:3</p> <p>instructions (2) 49:24;55:25</p> <p>interaction (7) 64:17;69:2;78:18; 81:5,8;83:23;88:8</p> <p>interchange (1) 80:8</p> <p>Internet (1) 69:21</p> <p>Interrogatories (7) 9:4;68:13;70:2; 75:4,5;88:24;89:3</p> <p>interrogatory (3) 10:2;55:21;68:14</p> <p>interrupt (1) 49:1</p> <p>interrupted (1)</p>	<p>80:20</p> <p>interrupting (2) 48:25;51:15</p> <p>intervene (1) 10:20</p> <p>intimidate (2) 28:22;52:18</p> <p>intimidated (1) 62:18</p> <p>intimidating (1) 80:9</p> <p>into (4) 5:14;27:17;66:7; 68:1</p> <p>investigate (1) 32:7</p> <p>investigation (1) 24:21</p> <p>involved (7) 25:15;50:16,17,19; 60:17;68:5;83:2</p> <p>involvement (4) 50:2,5;64:6;74:22</p> <p>involving (2) 36:10;47:20</p> <p>irritating (1) 42:23</p> <p>issue (2) 33:2;34:1</p> <p>issues (3) 22:12;37:15;47:20</p> <p>item (1) 86:17</p>	<p>54:1,16</p> <p>June (6) 34:19,22;35:23; 58:16;59:4;74:15</p> <p>jurisdiction (1) 32:3</p> <p>justify (2) 73:17,24</p> <p style="text-align: center;">K</p> <p>kept (1) 48:17</p> <p>kicked (1) 73:9</p> <p>Kimball (12) 19:1,2,16,25;20:1,4, 11,25;22:7;23:14; 30:14,18</p> <p>kind (5) 16:10;17:7;60:9; 79:2,3</p> <p>knew (6) 8:6;29:18;60:5,9, 12,14</p> <p>knock (1) 25:19</p> <p>knowledge (4) 74:2,3;76:9;90:7</p> <p>known (2) 15:19;75:11</p> <p style="text-align: center;">L</p> <p>laid (4) 36:14;65:2,4;75:1</p> <p>laptop (2) 70:16,17</p> <p>large (1) 47:14</p> <p>last (8) 9:11,12,13;81:2,19; 83:21;84:14;86:14</p> <p>late (1) 5:7</p> <p>later (3) 6:24;79:9;88:15</p> <p>laugh (2) 46:12,15</p> <p>laughter (1) 46:7</p> <p>law (18) 8:24,25;10:19; 13:25;26:13;36:2; 42:3;52:19,22;53:2; 55:14;60:25;62:15; 63:23;69:5;71:24; 73:17,23</p> <p>lawyers (2) 35:14;59:15</p> <p>lay (1) 27:11</p> <p>LCR#268 (1)</p>	<p>3:22</p> <p>leading (3) 25:17;44:17,20</p> <p>leaning (1) 82:6</p> <p>least (3) 9:18;33:1;59:4</p> <p>leave (17) 20:3,25;21:3,7; 29:2;51:19;52:16; 57:4,17;67:23;74:8, 11;85:23;86:10,21, 21;87:1</p> <p>leaving (2) 56:5;69:10</p> <p>led (2) 28:23;48:5</p> <p>left (14) 13:21;17:22,24; 19:9,15,25;20:20; 49:10,20;52:8;55:14; 66:5;67:25;82:7</p> <p>leg (1) 63:23</p> <p>legal (1) 21:20</p> <p>legislative (3) 54:1,5,10</p> <p>Leonard (12) 37:2;39:19;57:9,18, 21;83:6,11,24;84:5; 85:14;86:18,20</p> <p>lethal (1) 28:13</p> <p>level (2) 28:7;29:4</p> <p>levels (1) 27:13</p> <p>Licensed (3) 3:6;4:5;90:4</p> <p>lieu (1) 14:3</p> <p>lights (1) 63:4</p> <p>limit (1) 52:25</p> <p>limited (1) 11:11</p> <p>Linda (22) 10:17;37:20;41:17; 42:17;45:1;48:15,21, 24;54:8;56:1;58:25; 61:11;66:8,12;68:4; 71:4;73:9;76:25;77:4, 22;78:19;84:15</p> <p>Linda's (1) 60:18</p> <p>lines (1) 62:20</p> <p>lips (1) 47:3</p> <p>listed (1) 75:25</p>
I		J		
<p>idea (4) 13:15;32:22;55:13; 60:18</p> <p>identifiable (1) 36:2</p> <p>identified (2) 83:24;85:14</p> <p>identify (1) 76:16</p> <p>ie (1) 29:5</p> <p>ignore (1) 42:8</p> <p>impact (1) 28:8</p> <p>impression (3) 51:19;52:8,16</p> <p>improper (1) 7:6</p> <p>incident (10) 37:9;38:25;41:8; 44:14,18;71:4,10; 74:19,21;75:7</p> <p>include (1) 26:8</p> <p>Including (1) 39:19</p> <p>increase (1)</p>	<p>ink (1) 52:5</p> <p>inservice (1) 22:5</p> <p>inside (1) 75:8</p> <p>instance (2) 5:2;29:12</p> <p>instances (1) 58:16</p> <p>instruct (2) 57:12,16</p> <p>instructed (1) 51:3</p> <p>instructions (2) 49:24;55:25</p> <p>interaction (7) 64:17;69:2;78:18; 81:5,8;83:23;88:8</p> <p>interchange (1) 80:8</p> <p>Internet (1) 69:21</p> <p>Interrogatories (7) 9:4;68:13;70:2; 75:4,5;88:24;89:3</p> <p>interrogatory (3) 10:2;55:21;68:14</p> <p>interrupt (1) 49:1</p> <p>interrupted (1)</p>	<p>jacks (1) 28:8</p> <p>Jackson (2) 16:19,20</p> <p>jail (3) 63:17,18,20</p> <p>January (17) 10:8;11:4,8;32:24; 33:17;35:6,7,10,15; 36:1,11;43:21;58:16; 59:19;61:7;74:19,21</p> <p>Jasper (10) 47:16,18,23;55:11; 58:13,17;59:1,5,9,12</p> <p>job (10) 19:18;20:25;21:17; 31:3,12;32:21;62:11; 63:22,24,25</p> <p>Joe (1) 28:25</p> <p>joke (2) 46:10,19</p> <p>judge (3) 6:21;25:18;54:17</p> <p>judgment (1) 70:25</p> <p>Judicial (2)</p>		

listen (2) 6:22;51:16	many (7) 7:12;13:13;19:5; 20:12;38:8,17,19	7:15;8:24;12:1; 13:20;22:25;23:8; 25:13;26:3,23;30:5,8, 9,11;31:4;38:7;41:2, 4;48:14;50:8;51:25; 52:12;54:25;58:6; 64:15;69:23,23;77:15	19:24	12:17;20:7
litigation (2) 3:21;21:8	Mapp (2) 24:2,4	marathon (1) 7:9	minds (1) 26:23	movement (1) 26:4
little (3) 13:13;60:10;84:18	Marion (21) 6:15,17;8:19,21; 11:3;20:19,21;21:4; 22:7;23:14;42:19; 47:14;53:7,15,16; 54:5,10,13,16,23; 73:24	meaning (1) 72:1	minute (5) 5:9;10:18;27:3; 41:13;88:20	much (1) 7:24
live (2) 18:25;19:1	mark (5) 34:8,14;44:6;54:19; 75:17	means (2) 7:12;12:3	minutes (25) 5:8;26:19;33:4,13; 34:7;35:7;44:25; 45:15;78:17,21; 79:17;80:19;81:3; 82:17,19;83:7,22; 84:13,19,24;85:10,12, 18,22;86:14	must've (1) 39:24
living (5) 18:1,3,11,16;19:6	marked (6) 9:6;34:15;35:3; 44:7;75:19;78:16	meat (1) 26:16	mission (2) 29:5,5	myself (1) 46:25
location (1) 26:9	Market (1) 4:4	meeting (55) 10:9;11:5,8,12; 26:20,21,22;32:23; 33:17;34:19,23;35:6, 10,15,23,25;36:1,11; 37:5;41:20,25;43:16, 20;44:2,5;45:23;48:1; 50:11;51:5,10;55:25; 56:18,20;57:25; 58:20,22;59:5,21,25; 61:9,12;65:12;66:6,7; 68:5;69:3;72:19; 74:13,16;75:9;81:7, 12;86:21;87:7;88:2	misunderstood (1) 12:21	N
logs (1) 71:11	married (1) 58:25	meetings (10) 16:24;33:18,21; 43:2;58:19;71:20; 72:4;73:4,9;74:25	modify (1) 89:6	name (6) 6:12;8:18;32:14; 36:16;37:2;45:17
long (9) 8:10,20,22;15:1,3; 16:1,2;17:12;55:12	Mason (79) 10:17;36:16;37:7,8, 20;38:24;39:5;40:1, 10,20;42:17,21;45:2; 46:1;47:21,23;48:2, 10,16,21,24;49:25; 50:3,18;51:6,15; 52:14,19;54:8;55:5; 56:1,12;57:4,8,13,14; 58:25,25;61:11;62:3, 4;64:20,21;66:8,12; 68:4;69:4;71:4;72:16, 21;73:10,16,19; 74:11;76:25;77:22; 78:19,24;79:3,18; 80:15,20;81:5,15; 82:7,9,20;83:1,13,22; 84:15;85:13,23;86:5, 15,20;87:6,14,16	member (1) 88:2	money (1) 39:4	naming (1) 30:25
longer (1) 47:9	Mason's (4) 41:18;64:10;77:4; 88:1	memory (2) 41:11,12	Montgomery (2) 13:5,5	narrow (1) 68:19
look (23) 7:4,23,24;9:7,9,15, 20;25:16;26:18; 31:22;36:18;48:19; 55:20;60:21;62:5; 75:23;76:4;78:24; 86:16;88:19,24,25; 89:3	matter (5) 7:12;59:15;63:24; 64:1;88:9	mentality (1) 53:3	month (2) 33:18;58:22	Nashville (2) 11:23;13:24
looked (8) 6:10;34:3;37:25; 67:16;69:21;76:3; 81:22;82:22	may (7) 6:20;31:20,21;34:1; 42:6;60:2;67:21	mention (1) 16:6	more (16) 5:9,14;7:10;10:18; 18:6;27:3;28:18,25; 32:23;34:17;40:20; 45:12;63:5;71:23,23; 75:22	National (1) 5:18
looking (10) 9:9,21;10:4;36:16; 70:13;81:20;82:6,6,7, 9	maybe (5) 12:20;17:14;19:17; 20:13;45:12	message (1) 15:12	Morgan (86) 26:17,19;34:11; 36:11,14,24;37:23; 38:2;39:24;40:19; 42:18,22;43:22,24,24; 48:15,15,16,20,23; 50:3,25;51:4,12,15; 52:18;55:7;56:4;57:9, 18,19,20;58:8;59:22, 23;60:17,23,25;61:2, 23;64:6,17,23;65:2,5; 67:1,3,11,23;68:23; 69:3,10;72:17,18; 73:19,20,23;74:7,23; 75:2,7;76:25;77:5; 78:22,23;79:1,18,22; 80:16,21,23;81:5,9, 13,22;82:16;84:15; 85:8,19,19,24;86:2; 87:2,6,8;88:9	nature (3) 40:21;48:18;51:10
looks (4) 9:16;49:10;82:7,8	mayor (1) 54:14	met (2) 5:16;88:18	morning (3) 5:7;63:13;65:23	necessary (2) 7:8;27:15
lose (1) 20:2	mayor's (2) 65:23;69:13	metal (1) 42:11	motion (1) 71:1	need (12) 7:11,24;8:11;18:19; 27:2;40:2;62:6;63:13; 84:25;88:20;89:4,6
lot (11) 16:19;21:5;39:4; 46:7;65:9,10,17;68:2; 69:7;75:3;89:2	may've (5) 66:5,21;71:3,22; 85:15	mic (13) 39:6,12,17,21;40:2, 4,7,9;48:7,8,9;80:2,4	move (2) 21:7;28:7	needed (1) 39:6
loud (6) 29:13;37:14;38:3,5; 40:3;61:13	mean (27)	microphone (2) 38:4;79:19	moved (2)	needs (11) 7:8;37:14;40:20; 57:4,17;75:6;76:3,13; 85:23;86:6;89:5
louder (4) 41:5,6;48:16,17		middleways (3) 36:13;49:16,17		neither (1) 87:19
loudly (2) 39:10;79:23		might (4) 3:16;17:7;28:22; 41:11		next (9) 15:5;34:8;37:23,24; 40:19;44:6;65:12; 74:13;83:13
loudness (1) 60:1		might've (4) 17:7;62:10;66:19; 69:9		night (4) 35:21,22;53:19; 61:12
M		mileage (2) 31:15,21		ninety (1) 17:15
maintaining (2) 35:20;72:3		mind (1)		nobody (2) 46:24;63:22
making (3) 46:19;77:21;83:14				noncertified (1) 13:23
man (3) 55:2;82:22;85:23				none (3) 43:3;57:22;69:7
manner (1) 87:2				nonverbal (1) 57:7
				nor (1) 90:8
				Normally (1) 5:7
				Notary (2) 4:6;9:17
				noted (1)

<p>10:4 notify (1) 20:6 nowadays (1) 28:9 number (3) 10:2;55:21;86:17 numbered (2) 9:10;68:16</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>oath (1) 5:3 object (31) 6:24;10:15,22; 24:25;25:7;26:25; 27:10;28:21;29:7; 39:13,15;42:24; 46:11,23;47:6;53:10, 17;54:11;56:22; 68:10;73:25;77:9; 78:1;79:4,14;81:24; 82:13;85:2,5;88:5,16 objection (4) 6:25;10:5,5;25:6 objections (2) 6:22,23 observed (1) 36:10 obviously (2) 11:17;33:14 occurred (5) 66:12,15,18;67:7; 71:5 October (1) 90:12 odometer (1) 31:15 off (12) 5:11;8:13;24:18,24; 25:5;40:24;41:1,14, 24;48:24;60:10;63:6 Office (16) 8:19;10:12;22:9; 23:15;32:16;54:22; 55:2;64:2,7,9;65:23; 69:13;71:14,18;72:2; 73:3 officer (20) 6:16;12:3;14:10; 24:23;26:13;29:1; 32:14;36:3;42:3; 52:20;53:2;54:16,22, 25;55:5,9,10;58:13; 63:8;71:25 officer/deputy (1) 11:15 officers (15) 25:4;28:18;30:16, 23;31:2,13,23;32:1; 58:17,21;59:10,12; 61:1;63:3;69:5</p>	<p>officer's (1) 25:5 offices (1) 4:3 official (1) 62:17 officials (1) 61:1 often (1) 33:20 Ohio (4) 24:2,4,6;25:3 old (1) 63:7 once (10) 6:10;12:24;13:21; 33:18;39:24;44:2; 47:2;65:16;74:9;76:3 one (29) 5:9;13:11;29:1; 40:25,25;43:2,13,13; 45:3;48:12,12,13,13; 57:24;58:15,20;59:5; 60:18;61:21,21;63:2, 23;65:19;68:11; 76:23;82:6;84:14; 87:14,19 one's (2) 82:5,11 only (7) 7:25;16:6;27:15; 69:1;76:23;82:20; 87:11 onto (1) 85:8 Open (1) 45:11 openly (1) 15:1 operated (1) 13:3 operating (1) 42:18 opinion (3) 55:8;61:18;79:3 opinionated (3) 46:3,20;48:3 opportunity (4) 24:21;30:15,22; 32:5 orange (1) 82:10 order (2) 35:20;72:3 ordered (2) 27:1;86:20 ordering (1) 29:2 originally (1) 33:9 others (2) 22:19;26:7 other's (1)</p>	<p>8:9 otherwise (1) 36:2 out (42) 5:22;9:25;12:16,24; 15:2,3,12;26:19,21, 22;27:9,12,12;29:5, 20;36:16;37:24; 43:24;51:9;56:13,20, 23;57:1,25;58:3;60:3; 65:9,10,15,16;66:21; 67:23;68:1,5;69:7; 72:11;73:9;80:10; 81:7;83:11;84:6;86:7 outburst (4) 15:14;41:3,4,25 outcome (1) 90:9 outdo (1) 81:17 outside (13) 43:22;58:8;65:3,3, 16,17;66:25;69:7,11, 14;74:9,10;84:1 Over (21) 6:1;8:5;26:24; 29:22;41:5,6,13; 44:19;48:7,8,21,25; 50:20,24;54:22; 73:14;78:3;81:6;82:7, 22;83:17 own (7) 26:22;56:9,23; 60:17;67:24,25;84:6</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>page (3) 9:15;10:3;68:18 pages (3) 9:13;68:15;90:6 pants (1) 63:23 papers (1) 11:16 paperwork (1) 13:21 Pardon (2) 12:14;77:2 parking (5) 65:9,10,17;68:2; 69:7 part (2) 9:11;45:23 participating (1) 46:1 particular (4) 10:6;47:21;48:1; 56:3 parties (4) 3:19;62:2;72:13; 90:8 party (2)</p>	<p>3:14,20 passing (1) 66:21 past (4) 5:12;6:18;35:22; 47:2 pat (2) 23:5;25:19 patience (1) 89:10 patrol (6) 12:17,18;13:13; 14:10;31:5,8 patrolman (4) 19:13,15;32:18,19 Patton (1) 32:15 Paul (2) 63:11,16 pause (1) 62:19 pay (2) 32:22;47:20 paying (2) 40:13;82:11 PD (7) 16:15;20:16,25; 21:11;32:14;47:24; 59:1 pen (1) 52:5 people (12) 14:14,18;16:16; 25:10;42:1,7;51:14; 59:21;61:17;73:4; 81:20;83:8 pepper (1) 28:11 percent (1) 45:12 performance (2) 23:17;31:3 period (1) 17:20 periodically (1) 66:20 periods (2) 12:13,15 person (10) 42:6;45:1,9;46:17, 21;49:10;53:7;54:9, 13;76:16 personally (3) 45:6;61:20,22 persons (4) 21:22,23;73:8;75:6 perspective (1) 48:11 pertaining (3) 15:1;26:11;74:1 phone (3) 8:13;63:12,13 physical (6)</p>	<p>23:3;28:6;66:24; 67:2;74:6;80:10 physically (1) 27:8 pick (1) 25:19 Pittsburg (32) 6:2,3;13:22;14:8; 17:12,21,23;18:16,20; 19:3,7,10,12,15,18,20, 24;20:1,3,14,16;21:3, 5,8,11;22:6;23:14; 30:20;32:3,14,21; 62:24 place (1) 27:6 placed (1) 5:3 Plaintiff (17) 4:2;5:2,16;36:23; 49:25;51:4;55:24; 66:17;67:2,10;68:8, 12;77:24;82:21; 83:18;85:24;86:5 Plaintiff's (2) 9:4;78:18 play (3) 44:8;82:15;84:25 plays (19) 44:16,23;45:8,19, 24;78:20;79:16; 80:18;81:1;82:18; 83:5,20;84:12,21; 85:6,11,17,21;86:13 please (16) 6:12;7:12;34:9,14; 38:11,22;39:16; 40:16;51:9;55:21; 62:24;65:13;75:18; 79:12;85:1;89:7 PLLC (1) 4:4 podium (7) 40:9,10;49:9,12,20; 50:25;52:5 point (28) 28:1,1;29:19;41:13; 44:1;51:12;52:5; 57:24;58:2;59:20; 60:24;67:10;72:18; 73:16,22;74:6;78:14; 79:1,15;80:1,3;81:2, 9;82:20;83:1;86:11; 87:5,12 Police (32) 12:3,9,11;13:3,10, 13;19:5,12,18,20,22; 24:23;25:4,5;30:14, 17,21;32:13;42:10,10, 10;47:23,24;53:5; 55:5,9,10;58:13,17; 59:1,5;63:2 policies (7)</p>
--	--	--	--	--

<p>64:7,9;71:18;72:1, 2;73:23;74:18 policy (3) 73:17;74:1,3 politics (1) 21:6 population (1) 47:14 portion (1) 36:10 posed (1) 7:2 position (8) 6:14;8:19;21:4; 49:9;51:13;53:7; 62:17;82:24 possessive (1) 75:14 possible (1) 17:6 POST (13) 11:17,19,21,23,24; 12:1,20,21,25;13:16, 24;17:2;20:6 power (5) 51:22,23,24;52:16, 17 premark (1) 9:2 preparation (1) 71:15 prepared (3) 76:6,7;78:2 preparing (1) 69:16 present (15) 19:4;21:19;33:21; 34:19,22;43:19,19,25; 58:18;61:8;74:15; 75:7;76:1;83:15; 85:14 presenting (1) 81:11 pretty (2) 6:21;40:3 prevent (1) 8:15 previously (1) 73:3 prior (17) 7:5;8:22,23;12:25; 15:16,19,23;22:3; 35:23;43:1;48:6; 51:12;60:24;64:5,9; 69:15;76:20 private (1) 35:16 privileged (1) 7:7 probable (2) 87:17,20 probably (6) 27:2;34:18;38:10;</p>	<p>41:9;47:15;78:11 Procedure (1) 4:8 procedures (1) 74:18 proceeded (1) 74:12 process (3) 30:3,6,9 Production (4) 9:4,12;70:4;89:2 prohibited (1) 3:12 prompted (7) 50:2,5,15,17,24; 51:1,2 protect (3) 22:19;29:14;61:17 protecting (1) 61:15 protections (1) 22:16 provide (2) 3:9,14 provided (1) 69:20 provisions (1) 4:8 Public (9) 4:6;9:17;36:10,15; 61:8;64:2;70:10; 71:19;72:4 Pull (6) 36:22;37:10,11; 38:13;39:5;63:15 pulled (1) 69:21 pulls (1) 63:10 purposes (1) 35:9 Pursuant (2) 3:3;4:7 put (7) 18:13;25:20;65:7, 24;84:24;85:3,7 puts (1) 7:15 putting (2) 15:20;26:17</p>	<p style="text-align: center;">R</p> <p>Raines (1) 54:19 raising (1) 79:2 rates (1) 3:19 rather (1) 87:1 read (2) 79:11,13 reader (2) 11:25;13:19 reading (1) 86:15 real (2) 7:23;62:21 realize (2) 24:22;88:8 really (3) 9:1;17:17;82:24 reason (6) 17:24;23:9;25:14; 29:20;74:5,12 reasonable (5) 23:4,7;25:11;26:23; 46:21 reasons (1) 25:20 recall (37) 16:18;17:5,6,10,11; 20:5,15;24:14;30:12, 13;32:20;36:6,7; 37:12,13,21;38:20; 39:14;40:22;48:19, 20,23;50:1,23;57:6; 58:4,5,6,15;66:19,22; 68:8;71:21;79:5; 83:16;85:15,16 receive (7) 14:13,17;15:15,22; 16:15;22:21;57:7 received (3) 21:21;56:1;70:1 Recess (2) 44:12;78:7 recognize (1) 9:22 recognized (1) 33:25 record (14) 7:1;33:25;34:6,18; 35:2,13;45:17;68:22; 70:10,23;75:10,21; 76:5;79:13 recorded (1) 49:10 records (1) 11:22 Red (5) 37:3,8;39:19,20,20</p>	<p>refer (5) 33:8;35:9;44:13; 62:21;71:1 reference (1) 64:6 referral (1) 3:16 referred (1) 24:7 referring (1) 10:2 refresh (1) 41:11 refresher (1) 21:25 refreshers (1) 21:21 refused (1) 63:4 regarding (4) 14:17;15:23;56:1; 71:18 regards (1) 38:25 regular (4) 7:16;8:7;28:25; 88:1 Regulations (1) 3:3 relinquishing (1) 46:2 remain (1) 72:23 re-mark (1) 34:12 remember (12) 24:9;28:10;36:16; 40:18;49:2;51:11,12, 15;52:19;57:5;65:24; 67:13 remote (1) 78:12 removal (5) 48:6;49:25;56:2; 71:19;73:24 remove (9) 50:18;55:24;56:2; 59:17;61:8;82:21; 83:2;85:13;86:5 removed (14) 51:4;61:16;65:19; 73:4,9,18;74:23;83:8, 24;84:6;86:6;87:2,3; 88:10 removing (4) 26:8;27:5;61:2; 72:3 repaired (1) 37:14 repeat (2) 15:18;25:1 Reporter (7) 3:6,15;4:6;7:14;</p>	<p>8:5;31:7;90:4 REPORTER'S (1) 90:1 Reporting (10) 3:4,7,9,10,10,13,14, 15,18;90:10 reports (1) 71:10 represent (1) 5:15 Request (5) 9:4,12;64:10;70:4; 89:1 requested (1) 51:3 requests (1) 49:24 reside (1) 18:20 residence (1) 18:14 resident (1) 18:7 residents (1) 39:3 resign (1) 21:13 resource (2) 6:16;11:14 respectfully (1) 40:21 respond (2) 67:13,14 responding (2) 8:16;43:14 response (3) 9:25;45:25;79:3 responsibilities (1) 11:3 restraint (1) 15:19 restraints (3) 15:17,23;22:3 restrictions (1) 15:20 reverted (1) 55:5 review (4) 30:11;69:16;70:7; 72:1 reviewed (5) 14:1;34:3;69:20; 70:11;76:20 Reviewing (3) 10:1;76:4;89:8 right (78) 8:18;14:12;15:1,2, 3,6,11,21,24;17:4; 19:2,11;20:24;22:19; 23:24;27:21,22; 33:20;35:22;36:1,17; 38:11;39:11,16; 41:25;42:2,2,13;43:8;</p>
<p>Q</p> <p>quick (2) 7:23;61:13 quicker (1) 30:6 quieten (1) 48:17 quit (1) 21:15</p>	<p style="text-align: center;">Q</p>	<p>recognized (1) 33:25 record (14) 7:1;33:25;34:6,18; 35:2,13;45:17;68:22; 70:10,23;75:10,21; 76:5;79:13 recorded (1) 49:10 records (1) 11:22 Red (5) 37:3,8;39:19,20,20</p>	<p>refer (5) 33:8;35:9;44:13; 62:21;71:1 reference (1) 64:6 referral (1) 3:16 referred (1) 24:7 referring (1) 10:2 refresh (1) 41:11 refresher (1) 21:25 refreshers (1) 21:21 refused (1) 63:4 regarding (4) 14:17;15:23;56:1; 71:18 regards (1) 38:25 regular (4) 7:16;8:7;28:25; 88:1 Regulations (1) 3:3 relinquishing (1) 46:2 remain (1) 72:23 re-mark (1) 34:12 remember (12) 24:9;28:10;36:16; 40:18;49:2;51:11,12, 15;52:19;57:5;65:24; 67:13 remote (1) 78:12 removal (5) 48:6;49:25;56:2; 71:19;73:24 remove (9) 50:18;55:24;56:2; 59:17;61:8;82:21; 83:2;85:13;86:5 removed (14) 51:4;61:16;65:19; 73:4,9,18;74:23;83:8, 24;84:6;86:6;87:2,3; 88:10 removing (4) 26:8;27:5;61:2; 72:3 repaired (1) 37:14 repeat (2) 15:18;25:1 Reporter (7) 3:6,15;4:6;7:14;</p>	<p>8:5;31:7;90:4 REPORTER'S (1) 90:1 Reporting (10) 3:4,7,9,10,10,13,14, 15,18;90:10 reports (1) 71:10 represent (1) 5:15 Request (5) 9:4,12;64:10;70:4; 89:1 requested (1) 51:3 requests (1) 49:24 reside (1) 18:20 residence (1) 18:14 resident (1) 18:7 residents (1) 39:3 resign (1) 21:13 resource (2) 6:16;11:14 respectfully (1) 40:21 respond (2) 67:13,14 responding (2) 8:16;43:14 response (3) 9:25;45:25;79:3 responsibilities (1) 11:3 restraint (1) 15:19 restraints (3) 15:17,23;22:3 restrictions (1) 15:20 reverted (1) 55:5 review (4) 30:11;69:16;70:7; 72:1 reviewed (5) 14:1;34:3;69:20; 70:11;76:20 Reviewing (3) 10:1;76:4;89:8 right (78) 8:18;14:12;15:1,2, 3,6,11,21,24;17:4; 19:2,11;20:24;22:19; 23:24;27:21,22; 33:20;35:22;36:1,17; 38:11;39:11,16; 41:25;42:2,2,13;43:8;</p>

44:1;45:11;46:4;49:2, 5,19;50:2,12,15;51:7, 15;53:8,21;54:6,19, 23;55:2;56:18;57:25; 59:14;60:20;61:6; 62:18;63:6;65:13; 66:4,23;68:6;69:1,15; 72:17;73:6;78:15; 80:5;82:12,24;83:2,9, 17,18;84:2,4;85:7,7,9, 23;86:11;87:25;88:10	5:23;7:13;10:13; 12:6;81:19;83:4; 84:11 Sammy (2) 63:1,20 saw (3) 6:10;10:19;48:2 saying (8) 26:14;48:2;49:13; 51:16,21;52:2,24; 59:14 scale (1) 32:22 scene (2) 63:15;72:20 scheduled (2) 33:5,10 school (3) 6:16,17;11:14 schooling (1) 14:1 school's (1) 11:15 screenshot (3) 81:21;82:11,14 scuttlebutt (1) 73:12 seal (1) 9:17 search (5) 22:17;23:1,5,19; 25:22 searches (1) 22:22 seat (2) 72:23;88:14 seated (2) 49:6,22 second (2) 10:3;28:7 seconds (21) 45:1,15;49:8;78:17, 22;79:17;80:19;81:3; 82:17,19;83:7,22; 84:13,20,24;85:10,12, 18,22;86:15;88:9 section (1) 36:13 security (1) 35:20 seeing (1) 61:15 seeking (1) 28:17 seem (1) 79:25 seemed (2) 42:25;48:10 seize (1) 42:6 seizing (2) 25:21,22 seizure (8)	22:17;23:1,20; 25:24,25;26:12;27:4, 9 seizures (2) 22:23;31:24 self (1) 26:22 sent (3) 9:25;13:23;81:6 separate (3) 13:3;53:21,24 September (1) 4:2 sergeant (1) 63:10 serve (1) 11:16 served (3) 5:19,20,23 services (2) 3:10,14 servicing (1) 10:8 session (2) 7:9;11:15 sessions (1) 54:17 set (2) 5:8;35:14 sets (1) 7:25 seven (4) 19:21,21;20:17; 32:11 several (4) 13:7;25:17,17; 31:21 Sheila (3) 3:22;4:5;90:4 sheriff (30) 10:12,21;11:3;27:1; 29:1,15,17;50:20,21, 21,24;51:9,11;54:21; 58:11;60:4,8,12; 66:18;67:1;69:1;71:7; 76:25;77:22;81:6; 82:20;83:25;85:3,13; 88:13 Sheriff's (16) 6:15;8:19;11:9; 20:19,21;22:9;23:15; 32:16;54:22;55:2; 64:7,9;71:18;72:2; 73:3;77:4 shift (4) 31:14,17,19;63:11 shirt (2) 82:8,22 shook (2) 65:9,10 shorthand (1) 90:6 shot (1)	82:4 show (8) 7:22;8:1,3;35:7; 49:7,7;75:10,11 showed (1) 76:18 showing (3) 35:4;70:15;81:10 shows (2) 26:16;46:4 sick (1) 8:14 signaled (1) 51:3 Signature (5) 4:9;9:16,17,19; 89:11 signed (1) 25:18 similar (2) 12:6,7 Simple (1) 26:7 simply (2) 42:5,22 singular (1) 75:14 sit (7) 22:25;25:13;37:1; 50:23;58:24;87:25; 88:21 sits (1) 31:11 sitting (2) 36:12;51:14 situation (4) 62:15;72:9,10,12 six (1) 19:21 skills (1) 90:7 slap (1) 28:8 snippet (1) 48:2 soft-hand (1) 27:24 somebody (10) 10:17;25:21,23; 26:9;27:5;52:23;61:8; 64:25;67:17,19 somebody's (1) 29:12 someone (13) 23:3;24:24;25:4; 26:8;27:7,17,25,25; 28:17;29:2,12;36:23; 77:22 sometimes (5) 8:8;24:6;31:20,20; 33:22 somewhere (1) 29:3	Sorry (8) 5:7;13:1;19:8; 30:19;31:7;38:19; 60:6,7 sort (1) 36:12 sought (1) 49:25 sounded (1) 85:25 sour (1) 61:13 South (35) 6:2,3;13:10,22; 14:8;17:12,21,23; 18:16,20;19:2,7,9,12, 15,18,20,24,25;20:3, 14,16;21:3,5,8,11; 22:6;23:14;30:19; 32:3,13,21;62:24; 74:4,5 speak (8) 15:1,2;39:21;40:5; 65:25;74:13;79:22; 80:24 speaker (1) 83:23 speaking (3) 45:13;83:10;85:19 specific (4) 14:13;67:22;71:23, 23 speech (10) 14:18,19,21;15:17, 21,24;16:17;17:4; 22:4;73:15 speeding (1) 63:3 spend (1) 39:4 Spicer (1) 4:4 spoke (2) 37:21;78:22 spoken (1) 7:15 spokesperson (2) 15:12;41:20 spouted (3) 40:24;41:1,14 spray (1) 28:11 SRO (1) 6:16 St (1) 4:4 stamp (11) 33:12;44:25;49:8; 81:2,19;83:4,22; 84:11,14,23;86:14 Standards (1) 12:3 standing (1)
S				
safeguard (1) 41:25 safety (8) 25:20;26:6,6,6; 59:20,24;81:11,22 same (7)				

36:18 stands (1) 22:16 start (10) 5:11;27:22;43:20; 44:1,5;64:18;78:9,16, 17;84:19 started (9) 12:16;17:18;19:24; 37:19;38:2,12;80:11, 13,14 starting (5) 31:14,15;82:17; 83:4;84:11 starts (1) 60:23 state (8) 6:12,25;16:7;18:7; 53:25;55:1,1;90:2 statements (1) 15:14 States (5) 14:15,22,25;15:8; 22:13 stationed (2) 58:18;59:6 statute (1) 55:1 stayed (1) 56:6 step (2) 36:9,9 steps (1) 7:7 Stevenson (20) 12:11,15,17;14:9, 13;15:22;16:5,6,9,15, 20,23;17:21,22,24; 18:4,11;19:9;23:12, 12 still (6) 10:12;13:11;31:12; 49:6;72:19;82:4 stipulated (1) 33:25 stood (4) 38:2,12,14,23 stop (16) 7:4,13;24:19;26:4; 38:4,14;39:8;41:1; 62:16;63:4,4,5,14; 65:4;78:14;84:22 stopped (2) 63:3,6 stops (2) 24:7;25:9 straight (3) 17:23;20:20;82:9 street (2) 18:19;63:6 stuff (9) 6:11;11:16;13:23; 31:22;40:21;42:7;	69:25;70:5;89:3 Su (1) 4:4 submitted (2) 11:22;13:21 subsequent (4) 24:22;25:2,3;74:21 sudden (1) 64:24 summary (1) 70:25 sums (1) 14:25 superiors (1) 21:10 supposed (1) 39:25 Supreme (7) 23:16,21;24:1,14, 23;25:3;42:9 sure (5) 15:25;16:18;25:8; 56:13;62:24 surgery (4) 29:16;60:4,9,12 suspicion (5) 23:4,7;24:16;25:11, 14 synched (1) 40:14	3:3,6;4:5;11:22,24; 13:17,22,23,25;17:2, 13,21;18:1,4,11,14; 19:6,8,10,16;21:20; 23:13;30:1,15;47:19; 55:1;90:2,5,10 tension (1) 50:6 term (2) 12:7;23:8 terminated (1) 32:20 terms (2) 4:7;70:23 Terry (5) 24:6,7,10;25:3,9 test (6) 11:23;14:3,4;17:1, 3;23:13 testified (1) 5:4 testify (1) 76:2 testimony (3) 9:5;69:15;71:15 Thanks (1) 30:19 that'll (2) 45:12;78:6 thinking (2) 5:24,25 though (4) 6:20;28:16;72:8; 75:5 thought (8) 6:10;29:19;52:10, 11;61:17;64:25; 67:16,19 threat (3) 59:24;81:11;83:15 threatening (4) 79:1;80:1,9;81:10 three (7) 7:11;9:12;19:16; 53:21,23;63:5;64:23 throughout (1) 16:19 ticket (1) 62:20 Tight (5) 36:22;37:10,11; 38:13;39:5 tighten (1) 34:18 timeline (1) 19:23 times (2) 7:12;68:11 time-stamped (1) 78:16 titled (2) 9:3;75:12 TLETA (1)	13:24 today (16) 5:15,15;6:20;7:10; 8:1,14;9:5;13:11; 23:1;35:9;58:24; 69:15;71:15,17; 76:20;87:25 toe (1) 60:13 told (13) 8:18;24:14;39:6; 52:5;65:11,14,21; 67:11;69:12,14;74:8, 9;83:1 Tom (4) 33:2;34:6;35:2; 75:14 tomorrow (1) 65:23 took (13) 14:4;17:1,3;19:3; 23:13;56:20;60:16; 63:16,18,20;64:17; 65:22;86:7 touch (8) 29:13,25;35:1; 64:25;67:11,18;68:9, 24 touched (3) 15:25;29:24;67:21 touching (1) 27:25 toward (2) 82:7;86:1 towards (1) 83:18 town (1) 19:22 traffic (3) 62:16;63:4,14 train (1) 37:14 trained (2) 22:11;25:10 Training (36) 12:4;13:25;14:13, 17;15:16,22;16:10,16, 19;21:21,25;22:2,3, 21;23:11,14,15,19,21; 24:1,13,14;25:9; 27:20;29:25;30:1,10; 42:3,4;64:7,8,8;71:24, 25;72:2,8 True (7) 29:23;53:9,11;64:3; 76:8;86:12;88:11 try (3) 5:9;7:18,23 trying (10) 27:25;29:13,13; 41:5;48:16;52:17; 55:6;61:17;68:19; 81:17	turmoil (1) 21:9 turn (4) 8:13;31:6;36:18; 78:3 turned (6) 63:5,6;66:5;67:16; 83:11;85:9 turns (2) 57:3,3 Twelve (2) 38:21,22 two (9) 7:11,25;13:13; 40:25;50:6,14;63:11; 64:24;80:14 type (1) 10:20
U				
			ultimate (1) 53:7 under (11) 3:11;5:3;14:19; 15:7;25:23;30:9; 36:15;47:19;55:24; 56:3;88:3 unemployment (1) 17:20 unfortunate (1) 30:15 uniform (2) 36:2,7 United (5) 14:15,22,25;15:8; 22:13 unlawful (1) 31:24 unless (1) 41:21 unreasonable (4) 22:22;23:1,2;31:24 up (43) 5:8;8:10;12:17; 14:25;22:1;23:2,3,23; 25:18,19;28:13,23; 29:12,16;34:18; 36:19,22;38:2,12,14, 23;39:24;40:5,14; 43:4;44:17,20;45:11; 48:5;51:11;63:5,8,10, 14,15;67:12;69:21; 80:7;81:3;84:18;85:9; 86:2;87:6 update (1) 89:6 updated (3) 74:19;75:6;89:5 updates (4) 16:10;22:1,3;72:1 upon (6) 6:22,24;25:5;34:2;	

81:13,15 use (3) 27:15;28:13;78:4 used (2) 27:14;32:15 using (1) 70:23 usual (1) 3:18 usually (1) 39:21	23;63:8;67:12;68:3; 86:9 walker (1) 82:8 walking (1) 65:15 wants (1) 46:22 warrant (2) 25:18;79:2 waste (1) 68:19 watching (3) 46:9,18,18 way (14) 7:21;13:11,14; 38:15;46:21;47:8; 51:20;52:17;60:1; 62:1;65:25;68:1;79:2; 80:3 ways (1) 25:17 weapons (1) 28:8 wearing (4) 36:5,6,7,8 weather (1) 33:5 week (1) 65:24 weren't (8) 18:7;34:19;43:20; 56:2,5,10,12;74:15 West (2) 63:11,16 what's (6) 9:3;15:13,13;26:11; 52:8;75:10 wheels (2) 31:5,8 whenever (1) 50:17 whole (3) 9:15,20;56:17 wield (1) 52:17 wielding (2) 53:5,6 Wilson (8) 3:7,9,10,13,18,22; 4:5;90:4 Winchester (1) 6:5 WINTERS (4) 4:1;5:1;6:13;76:7 Winters' (1) 9:3 wish (1) 78:12 within (2) 21:9;32:3 without (4) 10:5;15:13;30:25;	67:24 witness (8) 4:9;5:2;44:17,22; 70:17,19,21;78:4 witnesses (1) 76:1 word (5) 7:14,15;40:22,22; 62:18 words (7) 42:11;51:8,11,17; 56:15;59:15;62:6 work (5) 5:10;12:10;19:12, 23;39:1 worked (6) 8:20;12:11;16:7; 19:16;30:2;32:15 working (6) 16:4,23;18:4;19:6, 8;63:11 works (2) 47:15;53:18 worried (2) 81:22;89:1 write (1) 62:20 writing (1) 7:16 written (2) 7:14;59:16 wrong (2) 19:4;46:21	18,22;86:14 1/17/2027 (1) 90:21 1:00 (1) 63:13 10 (3) 34:15;35:5,7 10:01 (1) 44:12 10:09 (1) 44:12 11 (10) 8:21;20:20,22;35:3, 4,6;38:1;85:18;86:16, 17 11:01 (1) 78:7 11:05 (1) 78:7 11:28 (1) 89:12 115th (1) 5:25 12 (8) 39:11;44:7;49:7; 70:13,18,21;76:19; 78:9 12th (2) 63:6,6 13 (3) 75:18,19,23 14th (2) 30:2,9 15 (1) 38:10 15th (1) 4:2 17 (1) 86:17 181st (2) 5:19,20 1969 (1) 24:1 1994 (1) 12:21 1995 (1) 14:10 1st (2) 5:19,25	2014 (1) 20:22 2024 (14) 10:8;11:4,9;32:24; 34:20,22;35:7,10; 43:21;58:16;59:5,19; 61:7;74:15 2025 (4) 4:2;58:23,24;90:12 203 (1) 4:4 20th (1) 90:12 22 (6) 10:8;11:4,9;32:24; 35:6;85:22 22nd (2) 33:6,10 23 (1) 84:13 24 (1) 74:15 24-9-136 (1) 3:12 26A1 (1) 75:12 29 (6) 35:7,10,15,23; 36:11;59:19 29th (4) 33:6,7;36:1;43:21	
V				3	
vehicle (1) 31:11 verbal (4) 7:16;27:22;28:18; 57:7 verbalize (1) 7:18 verbally (2) 27:8,8 versus (2) 24:4,6 video (37) 8:3;26:16,18;27:2; 29:21;36:5;41:8,13; 44:16,23;45:8,19,24; 46:4;48:20;52:7; 60:21;70:8,11;76:19; 78:20;79:16;80:18; 81:1;82:18;83:5,20; 84:2,12,21,22;85:6, 11,17,21;86:13,24 videos (2) 33:12;76:18 view (3) 49:9,11,11 violate (2) 65:20;74:10 violated (1) 65:17 violating (3) 32:2;73:17,23 violation (1) 32:6 voice (6) 36:17;38:18;60:2,2; 79:2;85:20 volume (2) 45:10;78:12 voluntarily (1) 21:15				3 (2) 10:3;86:15 30 (1) 49:8 31 (1) 78:22 33 (2) 8:25;82:19 34 (2) 78:17;85:10 35 (3) 44:25;45:15;84:24 39 (1) 79:17	
W				4	
waiving (1) 10:5 walk (3) 58:8;78:10;84:6 walked (8) 26:22;43:22;56:9,				5	
		Y			
		yards (1) 38:10 year (7) 12:18;17:16,16; 19:25;20:18,18;58:22 yearly (1) 16:10 years (14) 8:21,25;17:14; 19:17,21,22;20:12,13, 17,22;21:9;29:11; 32:11;42:9		5 (1) 38:10 15th (1) 4:2 17 (1) 86:17 181st (2) 5:19,20 1969 (1) 24:1 1994 (1) 12:21 1995 (1) 14:10 1st (2) 5:19,25	
		0		2	
		01 (1) 44:25 02 (1) 19:24		2 (2) 49:8;80:19 20 (2) 81:3;82:17 2000 (1) 5:22 2001 (1) 11:24 2002 (5) 11:24;14:7,10;17:2, 18	42 (1) 84:19 47 (2) 45:15;83:7
		1		5	
		1 (19) 44:25;45:15;78:16, 21;79:17;80:19;81:3; 82:17,19;83:7,22; 84:13,19,23;85:10,12,		5 (1) 55:21 50 (1) 78:16 51 (3)	

78:21;79:17;84:19 52 (9) 80:19;81:3;82:17, 19;83:7,22;84:23; 85:10,12 53 (3) 84:13;85:18,22 537 (1) 4:4 54 (1) 86:14 56 (1) 85:12 59 (1) 83:22				
6				
6/30/2026 (1) 90:20				
8				
80s (1) 13:10 89 (1) 90:6				
9				
9 (5) 9:6,9,16;55:20; 68:14 9:04 (1) 4:3 92 (1) 12:16 94 (4) 11:21;12:22,22; 13:1 95 (2) 12:19;45:12				