

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

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

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

Chattanooga, Tennessee
September 26, 2025

DEPOSITION OF SHERIFF RONNIE "BO" BURNETT

APPEARANCES:

FOR THE PLAINTIFF:

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

FOR THE DEFENDANT:

B. THOMAS HICKEY, JR., ESQ.
Spicer Rudstrom PLLC
537 Market St., Su 203
Chattanooga, TN 37402
(423) 756-0262
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

SHERIFF RONNIE "BO" BURNETT:
Examination by Mr. Flores 5

INDEX TO EXHIBITS

No. Description	Page
16 Defendant Ronnie "Bo" Burnett's Answers To Plaintiff's Interrogatories and Requests for Production	8

- - -

PRIOR MARKED EXHIBITS DISCUSSED

EXHIBIT 5

1 DISCLOSURE

2 STATE OF TENNESSEE

3 COUNTY OF HAMILTON

4 DEPONENT: SHERIFF RONNIE "BO" BURNETT

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 SHERIFF RONNIE "BO" BURNETT,
2 taken on the 26th of September 2025, on behalf of the
3 Plaintiff, beginning at approximately 1:26 p.m., in the
4 offices of 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 SHERIFF RONNIE "BO" BURNETT,
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 Sheriff, I say this from the start, but I'll, you
8 know, say it and then it turns out to be otherwise. I'm
9 going to try to be as brief with you as we can here --

10 A I appreciate that.

11 Q -- because we've got a lot of it on video. I just
12 want to go into some background about the sheriff's
13 department policies and so on and so forth because you're
14 the best source for that.

15 Have you ever given a deposition in the past?

16 A I have.

17 Q So you're probably familiar with -- and you've
18 seen the interaction that Thomas and I had with
19 Ms. Mason?

20 A Uh-huh.

21 Q If there are questions that I put to you, try to
22 verbalize them, yes, no, whatever. If there are -- if I
23 tend to talk over you, or vice versa, it won't pick up
24 well. And I'll do my best --

25 A I'll do my best not to talk over you, counselor.

1 Q And if there are any questions that you don't
2 understand, please let me know --

3 A I will.

4 Q -- and then I'll rephrase them.

5 So, you've given a deposition in the past. Can
6 you give us an overview of what the occasions were?

7 A On the last deposition?

8 Q Any deposition.

9 While Thomas is doing that, I failed to ask you to
10 say your full name.

11 A Ronnie Burnett.

12 Q And you go by Bo?

13 A Uh-huh.

14 Q And is that what people in Marion County know you
15 as, Bo Burnett?

16 A Given to me by my great-grandmother.

17 Q And how long have you been sheriff of Marion
18 County?

19 A Twenty-three years.

20 Q Can you describe your responsibilities as a
21 sheriff?

22 A Several responsibilities. I mean, you know, the
23 biggest thing is my budget. I have -- I'm in charge of
24 the jail; make sure civil process gets served; I'm in
25 charge of security of the courts; go to county commission

1 meetings and be available to them if they have questions.
2 Basically that's all I can think of right now. I'm sure
3 there's some more duties.

4 Q I'm going to -- before we get too much farther in,
5 I'm going to have you take a look at -- watch your
6 fingers on here, Sheriff, because looks like one of the
7 paper clip prongs are sticking out.

8 Sheriff, go ahead and take a look at that document
9 and review. And if you can, there is a page -- it's not
10 numbered but it comes after -- and I don't know why these
11 are not numbered. But after interrogatory 19 there is a
12 page that bears a signature on it. It would be the very
13 next page after that, Sheriff. There you go. Is that
14 your signature there?

15 A It is.

16 Q And that's a copy of your signature, correct?

17 A It is.

18 Q Do you have any reason to doubt that it's your
19 signature?

20 A No, I don't.

21 Q And if you could take a look at the entire
22 document. And let us know when you're ready and --

23 A I'm ready. I've already looked over it before.

24 MR. FLORES: If we could go ahead and mark
25 that as his.

1 ([Exhibit 16](#) was marked.)

2 Q Sheriff, I'm producing that to you because I'm
3 going to be referencing it back and forth.

4 A Uh-huh.

5 Q So, can you describe your responsibilities as
6 sheriff as they pertain to attending county commission
7 meetings?

8 A I don't think I'm required to attend them. I
9 attend them as a courtesy to the commission, because a
10 lot of times, you know -- and a lot times I have things
11 on the agenda that I have to address. But, you know, I
12 don't think statutorily I'm required, but I do it as a
13 courtesy. Always have.

14 Q And were you present at the Marion County
15 commission meeting on January 29, 2024?

16 Now, let me explain to you a couple things. The
17 minutes and the agendas dealing with the commission
18 meetings, particularly this one here, Exhibit 5,
19 we have -- the meeting actually occurred January 29, even
20 though the agenda says January 22nd.

21 A Okay. I was confused on the dates.

22 Q You recall being at that January meeting?

23 A I was.

24 Q And prior to going into the meat and potatoes of
25 that, because we're going to reference the video -- I'm

1 going to queue that up. Before we get into that, I
2 wanted to make sure we had that ready to go.

3 Have you specifically received any training
4 regarding the handling of public meetings and
5 interactions with citizens?

6 A No.

7 Q And I'm going to ask you some silly questions, it
8 may seem like. You're POST certified, are you not?

9 A Uh-huh.

10 Q And is that yes?

11 A Oh, I'm sorry. Yes. I forget. My apologies.
12 Yes.

13 Q And for the record for your deposition, POST
14 stands for Peace Officer Standards and Training
15 Commission?

16 A Uh-huh. It is.

17 Q And to be a law enforcement officer in the state
18 of Tennessee, you have to be POST certified?

19 A Correct.

20 Q So are you familiar with any Marion County
21 Sheriff's Office policies regarding the removal of
22 individuals from public meetings?

23 A No.

24 Q Are you aware of any department policies
25 concerning the use of force or de-escalation of --

1 de-escalation tactics? Let me back up.

2 Are there any policies or training that the
3 sheriff's office gives their deputies regarding
4 de-escalating situations involving members --

5 A That's part of inservice training now, is
6 de-escalation. You're required to have an hour, I think
7 an hour course on it.

8 Q And have you and Deputy Winters had that type
9 of -- that training?

10 A Yeah. I just took mine last week.

11 Q And can you explain what your department's use of
12 force policy requires regarding interactions with the
13 public? Just overall.

14 A Oh. Well, you know, I like for my officers to,
15 you know, use verbal de-escalation if they can. And if
16 it gets to the point they can't, they can use soft force,
17 we call soft force, putting hands on. Can use force to
18 put somebody in a position to handcuff them if they're
19 making an arrest. If that doesn't work, they can use
20 tasers. The last part of use of force is deadly force,
21 which I just...

22 Q And would you agree with me that having multiple
23 officers on a scene would be almost a deterring effect to
24 try to -- can be used to try to calm somebody down, to
25 de-escalate them?

1 A Oh, yes.

2 Q Now, let's go and focus on the January 29th
3 meeting. Can you describe the events that led up to your
4 interaction with Mr. Morgan?

5 A Well, I was in the audience. Mr. Morgan was at
6 the podium. Him and chairman Linda were -- I don't know
7 how to describe it. They were both back and forth with
8 each other, and at some point she said, "I can have you
9 removed." And she says, "Sheriff Burnett, I want him
10 removed from this meeting."

11 Q And have you seen the video of this case, of the
12 January 29th meeting?

13 A Uh-huh.

14 Q Is that yes?

15 A Oh. Yes. I'm sorry again.

16 Q I'll keep reminding you.

17 A Yeah, do that.

18 Q I don't want to seem like a smart aleck.

19 A No, I understand. I know better.

20 Q So, was it Ms. Mason that requested your
21 assistance in regard to Mr. Morgan?

22 A It was.

23 Q And, you know, the video will speak for itself,
24 but what do you -- as we sit here now, what do you
25 understand Ms. Mason's request was?

1 A To remove Mr. Morgan from the meeting.

2 Q Now, did you find -- at one point -- or at any
3 point during this meeting did you observe Mr. Morgan
4 acting in a disruptive or threatening manner?

5 A I don't really have an opinion, you know. He was
6 speak loudly, but I don't know -- I don't, I don't have
7 an opinion on it.

8 Q Well, and not to put too fine a point on it, but
9 did you observe anything from Mr. Morgan that would've
10 been disruptive or threatening? I'm asking your
11 observations.

12 A You're asking my opinion? My personal opinion or
13 my law enforcement opinion, or what?

14 Q Yes. As a law enforcement officer, yes, Sheriff.

15 A Not at that time I didn't.

16 MR. HICKEY: Object to the form.

17 Q When you approached the plaintiff, what did you
18 say to him?

19 A I told him, best of my recollection, I said, "You
20 need to leave."

21 Q And do you remember his response?

22 A "Am I under arrest?"

23 And I said, "You need to leave."

24 And he said -- best of my recollection, he said,
25 "You're violating my First Amendment rights."

1 And I said, "I'm not asking to leave," I said,
2 "the chairman is. You need to leave."

3 And he turned around and left. And that was, that
4 was the only conversation I had with him.

5 Q All right. Do you recall if you made any physical
6 contact with him?

7 A I may've put my hand on his shoulder. I can't
8 remember. I looked at the video the other day, but there
9 was something blocking it. But I don't remember making
10 any physical contact with him.

11 Q All right. If you had, would that be a soft hands
12 type tactic?

13 A Very much soft hands.

14 Q All right. Did anyone else, for example, Deputy
15 Winters, use any kind of -- make any kind of physical
16 contact with Mr. Morgan?

17 A Not that I seen.

18 MR. HICKEY: Object to the form.

19 Q At any time was Mr. Morgan, either by you or
20 Deputy Winters, placed under arrest or threatened with
21 arrest?

22 A No.

23 Q If anyone was making any threats of arrest, who
24 would you believe that would've been coming from?

25 MR. HICKEY: Object to the form.

1 A I didn't hear any threats of arrest from anybody.

2 Q And how long did the entire incident involving
3 your contact with Mr. Morgan last?

4 A Probably 15 or 20 seconds.

5 Q What authority did you act upon to remove or
6 assist in removing Mr. Morgan from the meeting?

7 A A request from the chairman.

8 Q Do you believe that -- in removing Mr. Morgan,
9 were you following orders from someone? Is that what
10 your belief is?

11 A I was following a request.

12 Q Following a request. So you don't believe that
13 Ms. Mason was ordering you to do that?

14 A No. No, I don't.

15 Q You understand the different co-equal branches of
16 government, don't you?

17 A I do.

18 Q And what are they? What are the three different
19 branches of government?

20 A Are you talking about the federal government or
21 local, state government? Which government are you
22 talking about?

23 Q All of our government, whether --

24 A Well, you have --

25 Q -- it's city or state.

1 A You have judicial, you have administrative and --
2 I'm not sure what the third one would be.

3 Q There are actually the legislative --

4 A Oh, okay. If you're talking about -- legislative,
5 you have judicial, and the administrative, I guess you
6 can call it. Governor or president, congress, and then
7 Supreme Court, or whatever, if you want to use the
8 federal system.

9 Q But you as the sheriff, you would agree with me
10 that you're in the executive branch of government,
11 correct?

12 A Yes.

13 Q Had Ms. Mason, you know, ordered you or directed
14 you -- not requested but said "I'm ordering you" or "I'm
15 telling you you need to remove Mr. Morgan," would you
16 have taken any different steps or acted differently with
17 Mr. Morgan?

18 MR. HICKEY: Object to the form.

19 A No.

20 Q Prior to removing Mr. Morgan, did you consult with
21 anyone, such as another commission member or other law
22 enforcement officers?

23 A No.

24 Q Do you believe that, from your law enforcement
25 experience, that two officers, two law enforcement

1 officers at the direction or request of a county
2 commissioner to leave is coercive in nature?

3 MR. HICKEY: Object to the form.

4 A I'm not understanding your question.

5 Q Do you understand -- and again, not to be a smart
6 aleck but just so the record is clear, do you understand
7 what the term "coercion" means?

8 A Yes.

9 Q And what does that mean to you?

10 A Intimidate.

11 Q Would you agree with me that sometimes law
12 enforcement officers can accomplish their mission by
13 simply their presence and saying, "look, you have to go,"
14 because they're clothed in authority as a police officer?

15 A Oh yes.

16 Q And so that would actually be a helpful tactic, to
17 remove somebody by using police coercion rather than
18 going straight to the baton or something --

19 A Oh, yes.

20 Q -- like that?

21 Besides, as you claim, your words, Ms. Mason
22 requested, were you instructed by the chairperson or
23 anyone else about how to handle Mr. Morgan after he had
24 left --

25 A No.

1 Q -- the building?

2 All right. When you removed Mr. Morgan, did you
3 follow any particular policy of the sheriff's office in
4 the removal?

5 A Not that I'm aware of.

6 Q Are you aware of any written rules or guidelines
7 from the commission or the county as a whole, outside of
8 your agency, about removing members of the public from
9 the county commission meetings?

10 A I'm not aware of any.

11 Q The sheriff's office policies, did you or Deputy
12 Winters deviate from the policies regarding the removal
13 or -- let me back up.

14 The sheriff's office has policies regarding the
15 use of force, does it not?

16 A It does.

17 Q If you could take a look at [Exhibit 16](#), Sheriff.
18 And we're going to a document here -- it's some documents
19 that you've added on the request for production. And I'm
20 starting at page 22, and it's on the use of --

21 A Oh, you're talking about the policy?

22 Q Yes, sir.

23 A I don't have that in this one.

24 MR. HICKEY: It's page 22 of the policies.

25 Q Of the policies. It should be attached to your --

1 A They're not here.

2 Q They're not in there?

3 A Well, maybe they are. Yeah. I'm sorry. I'm
4 sorry.

5 Q No apology necessary. See that?

6 A Yes.

7 Q All right. So, just kind of walk through for the
8 reader of this deposition. This is a policy that you
9 require your deputies to go by, correct?

10 A It is.

11 Q And then going on page 23, it goes to restrictions
12 on the force, right? Such as choke holds, impact weapons
13 and so on. And then page 24 goes further on impact
14 weapons; talks about chemical spray --

15 A Uh-huh. Yes.

16 Q -- and tasers; is that correct?

17 A Yes.

18 Q Okay. So looking at page 22 again, it comes under
19 a subheading of Authorization to Use Non-Deadly Force.
20 And those speak for itself. Looking at page 22, did you
21 or Deputy Winters deviate in any way from the policy
22 dealing with the use of non-deadly force, particularly
23 the authorization to use non-deadly force?

24 A No.

25 Q But here -- the policy speak for itself. It

1 says: "Officers are authorized to use department-approved
2 non-deadly force techniques and authorized weapons to
3 prevent the escape from custody, or effect a lawful
4 arrest, or a person whom the officer believes has
5 committed an offense."

6 A Yes.

7 Q And then it also says: "Protects or defend the
8 officer or others from what he reasonably believes to be
9 active resistance while effecting or attempting to effect
10 an arrest, or while preventing or attempting to prevent
11 an escape."

12 Looking at that policy, was the removal of
13 Mr. Morgan from the commission meeting commensurate with
14 the authorization to use non-deadly force to get him to
15 leave the meeting?

16 In other words, what specifically was he doing,
17 other than being -- that Ms. Mason wanted you and Deputy
18 Winters to remove him, what was Mr. Morgan specifically
19 doing that would've compelled you on your own to remove
20 him from the meeting? Let's just say on your own. Was
21 he doing anything that you saw that would've justified
22 you and Deputy Winters to come up and remove him from the
23 meeting?

24 A I don't see anything that would compel me to do
25 that.

1 Q You didn't see it. All right.

2 Sheriff, did you prepare any reports or written
3 documents involving your interaction with Mr. Morgan at
4 the January 22 -- or 29, 2024 meeting?

5 A No, I didn't.

6 Q Did you have any communications after the incident
7 with Ms. Mason or other deputies or any other county
8 official regarding Mr. Morgan's removal?

9 A I spoke to Deputy Winters after the meeting.
10 Because he, he did walk outside, and I just asked him
11 what was the conversation about when they went outside.
12 And he said he gave him information about how to get on
13 the agenda and come back next month to speak.

14 Q You're talking about "he" being Deputy Winters?

15 A Deputy Winters, yes.

16 Q To your knowledge, has anyone else been removed
17 from a county commission meeting by order of a commission
18 member?

19 A Not in my 23 years.

20 Q Would this be the first time?

21 A It is.

22 Q Do you find that unusual?

23 A I do.

24 Q And why do you find it unusual?

25 A I've been going to county commission since 1980

1 when my dad was on there. And I've been going to them
2 regularly since then, and I've never seen anybody removed
3 until that night. So I would consider that unusual.

4 Q And you would agree with me there were no criminal
5 charges filed against Mr. Morgan as a result of the
6 January 2024 meeting?

7 A There was not.

8 Q I think I'm just about done.

9 You weren't present at the June 2024 meeting, were
10 you, Sheriff?

11 A Evidently I wasn't. I couldn't remember, but to
12 listen evidently I wasn't.

13 Q And the same questions I put -- I don't know if
14 you were here for Ms. Mason. But your understanding as
15 sheriff, do you know how -- can you describe your
16 understanding, as the sheriff of Marion County, of how
17 the First Amendment protections, such as freedom of
18 speech and assembly, apply to people addressing county
19 commission meetings?

20 A I think they have a right to their opinion at
21 county commission meetings.

22 Q Whether the county commissioners like it or not,
23 as long as they're not -- the person addressing them is
24 not being threatening with violence or even using foul
25 language such as "f you," you believe that they can

1 address them as they deem fit, as long as they don't go
2 over those lines?

3 A I agree.

4 MR. HICKEY: Object to the form.

5 Q Do your officers receive any training on First
6 Amendment rights and how they apply to public meetings?

7 A It's in the inservice training. It's a yearly
8 thing. We have to do for 40 hours, and some of that's in
9 their training.

10 Q And can you give us an overview of what you -- of
11 some of that training that you just talked about --
12 described?

13 A Well, basically it covers First Amendment, Second
14 and the Fourth, which are, you know, three of the basics
15 we use in law enforcement, you know. And it's -- there's
16 a class on it. I just took it myself here not long ago.
17 Just explains it.

18 Q I'm going to just review a couple other things and
19 then we're going to go straight to that one video and
20 then we'll be done.

21 Sheriff, if you could go ahead and take a look at
22 [Exhibit 16](#), and start back with those policies. I want
23 to direct your attention to page 19.

24 So, I'm looking at Procedures. It's policy 4.0.
25 It's on page 19.

1 A De-escalation?

2 Q Yes, sir.

3 A Okay.

4 Q And here -- it speaks for itself, but it talks
5 about, like on de-escalation, Section A, 5, "When
6 feasible, officers should practice tactical
7 repositioning" to lessen the level of danger involved,
8 you know, moving by to another location, and so on. Also
9 talks about, when feasible, "will use disengagements,
10 area containment." And it also talks about, number 1,
11 "shall use advisements and warning persuasion" before
12 resorting to force.

13 Is that what you and Deputy Winters were doing
14 here when you approached the plaintiff, is that you were
15 trying to de-escalate him and using some kind of
16 persuasive verbal instructions?

17 A That was my intention.

18 Q And so in this particular case, do you believe
19 that by putting your hands on him, whether it's even for
20 a brief moment, was following the force continuum to try
21 to persuade Mr. Morgan to leave on his own?

22 A I do.

23 Q And was there any intent to, at that point, to
24 cause him any physical harm?

25 A No.

1 Q All right. Do you understand -- and we'll look at
2 the video, but do you understand as we sit here today
3 that Mr. Morgan believed or felt like that was harm, you
4 know, he was -- that you were inflicting some kind of
5 harm on him?

6 A Sure. I understand that.

7 Q You understand that's his position?

8 A Yes. I understand that.

9 Q All right. So, Sheriff, we're going to go now to
10 the video.

11 Sheriff, I'm going to start at 1 hour and 37
12 minutes, and then I'll ask you some questions from the
13 video here. Can you see it okay?

14 A Yes, I do.

15 (Video plays.)

16 Q And so in summary, it's Commissioner Brandt asking
17 of Mr. Gallagher a question about the chairman
18 relinquishing the gavel before they engage in any
19 conversations. Do you agree with me that's one of the
20 topics here that Mr. Brandt was talking about?

21 A It is.

22 Q And so we'll play on. It's at 1 hour 37 minutes
23 23 seconds.

24 (Video plays.)

25 Let me ask about that. Because Mr. Gallagher was

1 saying, you know, the chairman is not supposed to engage
2 in those kind of discussions and follow the rules of
3 order. And then we heard Ms. Mason say "I never follow
4 the rules. I am opinionated."

5 Did you think that that was a joke?

6 MR. HICKEY: Object to the form.

7 A Yes, I did think it was a joke.

8 Q Did you think it was an appropriate joke, given
9 that she's the chairman of the commission and this is not
10 only in front of a meeting of the citizens but was
11 live-streamed to the community?

12 A My answer would be I wish she hadn't said it.

13 Q So would you have done that as sheriff, if
14 somebody asked you about do you follow the rules, the
15 law, to say "I don't follow the law, I'm opinionated"?
16 Do you think it would've --

17 A I don't believe I would say that.

18 Q And I know you wouldn't have, Sheriff. I've just
19 got to let you say what your opinion was of Ms. Mason
20 saying this to the public.

21 So now I'd like to go into the event with
22 Mr. Morgan.

23 (Video plays.)

24 Okay. At 1 hour 50 minutes 26 seconds,
25 Ms. Mason is asking "Does anyone have any public

1 comments?"

2 (Video plays.)

3 So 1 minute and -- 1 hour and 50 minutes and
4 39 seconds, can we agree that's Mr. Morgan that's
5 addressing Ms. Mason? Do you need to hear some more?

6 A No.

7 Q Can we agree that's him?

8 (Video plays.)

9 A That's Dave Thompson there.

10 (Video plays.)

11 Q So at 1 hour 50 minutes 57 seconds, that's
12 Mr. Morgan identifying himself. Did you hear that?

13 A I did.

14 (Video plays.)

15 Q So finishing up at 1 hour 51 minutes and 30
16 seconds, we heard Mr. Morgan addressing the commission
17 and Ms. Mason saying, "Okay, buddy," pointing her finger,
18 "look, we're not going there." Was Mr. Morgan being
19 aggressive or disruptive at that point?

20 MR. HICKEY: Object to the form.

21 A No.

22 Q What was your opinion of Ms. Mason's comments and
23 conduct toward Mr. Morgan at that point?

24 MR. HICKEY: Object to the form.

25 A I really don't have an opinion. That was -- she

1 was the one that did that. So I don't really -- I really
2 don't have an opinion on it.

3 Q Do you think that was appropriate, given her
4 position as the chairman of the commission, to have made
5 those gestures and made those comments to Mr. Morgan?

6 MR. HICKEY: Object to the form.

7 A I don't have an opinion. I just, you know -- I
8 don't know.

9 Q Would you have done that as sheriff?

10 MR. HICKEY: Object to the form.

11 A I would hope I didn't, but, you know, there's
12 probably been times that I have. But I just -- I'd hope
13 I wouldn't.

14 Q But you understand that she's the chairman of the
15 commission, the governing body, legislative body of
16 Marion County, Tennessee, correct, during that time?

17 A That's correct.

18 Q And you understand that she's holding that
19 position as a representative of county government in
20 general, right?

21 A Yes.

22 Q And you don't believe that her conduct was
23 appropriate or inappropriate?

24 MR. HICKEY: Object to the form.

25 A I really just don't have an opinion. I mean,

1 that's, that's her actions. So, you know -- I know you
2 want me to voice an opinion, but I really don't have one.

3 Q All right. Let me ask you this: As a law
4 enforcement officer, by acting in this way -- or at this
5 point who do you believe escalated the situation from
6 just the dialogue as we heard from Mr. Morgan to more
7 heated exchange?

8 A Probably both parties.

9 Q Both parties you think?

10 A I think, yes.

11 Q So at this point is it fair to say that the first
12 one -- I guess the first blow struck would be Ms. Mason
13 to Mr. Morgan?

14 A I would agree with that.

15 Q Let's march on. We're going to 1 hour 51 minutes
16 30 seconds.

17 (Video plays.)

18 So, at 1 hour 52 minutes and 1 second, Mr. Morgan
19 is saying "Will you let me speak, you know, not talking
20 over me," to that effect. At that point, was Mr. Morgan
21 being disruptive?

22 A In my opinion, no.

23 MR. HICKEY: Object to the form.

24 (Video plays.)

25 Q At 1 hour 52 minutes and about 4 seconds,

1 Ms. Mason then says "I can have you removed." Did you
2 see any -- "if you like."

3 Did you see anything at that point, several
4 seconds later from my last question, anything Mr. Morgan
5 was doing that would've justified him being removed
6 involuntarily from the commission meeting?

7 A I guess --

8 MR. HICKEY: Object to the form.

9 A -- it was the opinion of the chairman that he was
10 being loud and argumentative with her.

11 Q No. I'm saying you as a law enforcement officer
12 and the chief law enforcement officer of Marion County,
13 did you see anything that would've justified removing him
14 from the commission meeting at that point?

15 MR. HICKEY: As law enforcement?

16 MR. FLORES: Yes.

17 A As law enforcement, no.

18 (Video plays.)

19 Q At 1 hour 52 minutes and 15 seconds, Ms. Mason
20 said she was not going to listen to it. As we sit here
21 today, do you know what she was talking about? Not going
22 to listen to what?

23 A I reckon the comments that he was making to her,
24 or the statements or whatever, I'm assuming.

25 Q Did the way -- from your observation, did it look

1 like Ms. Mason simply just didn't like what Mr. Morgan
2 had to say?

3 MR. HICKEY: Object to the form.

4 A I don't know. I don't know what she thought.

5 Q What was the impression upon you, though, Sheriff?

6 MR. HICKEY: Object to the form.

7 A I guess him being argumentative with her.

8 Q So you don't --

9 A It's hard for me to say what she was thinking,
10 because I really don't know. I'm assuming that he was
11 being loud and argumentative with her and she wanted him
12 removed. That was the gist of what I got.

13 Q Let me try to word this another way, Sheriff. I
14 mean, you've been a police officer and just regular Joe,
15 you know, however many years you've been alive --

16 A Forty-six.

17 Q So, have you seen situations where one person
18 doesn't like -- simply just didn't like what the other
19 person has to say and gets upset about it?

20 A I have.

21 Q Does that -- does Ms. Mason's response to
22 Mr. Morgan compare to folks that you've seen that get
23 upset because they simply don't like what they hear?

24 MR. HICKEY: Object to the form.

25 A It does.

1 (Video plays.)

2 Q So, at 1 hour 52 minutes and 24 seconds,
3 Mr. Morgan was saying what he was saying, and, you know,
4 responded to Ms. Mason. And Ms. Mason says, "Can you
5 remove him?"

6 At this point, Sheriff, did you see any reason as
7 a law enforcement officer that you would've had to've
8 arrested him or physically removed him from the meeting
9 because of any violation of state law?

10 A At that point I wouldn't have filed any charges
11 against him.

12 Q Would you -- if it was left up to you at that
13 point, Sheriff, would you have removed him at all?

14 MR. HICKEY: Object to the form.

15 Q At this point.

16 A No. No, I wouldn't.

17 Q Okay. "At this point being" 1 hour 52 minutes and
18 25 seconds.

19 (Video plays.)

20 And I know the video speaks for itself, but at one
21 point -- I don't know if we can actually get it to that
22 screen, that shot.

23 All right. At 1 hour 52 minutes 17 seconds, it
24 looks like someone's hand is up there. We can't tell
25 because the gentleman with the blue shirt is in the way.

1 But is this where you think you might've, you know --

2 A I might've touched his arm at that point.

3 Q And did you see where Mr. Winters had come up and
4 put his hand on --

5 MR. HICKEY: Object to the form.

6 Q Watch from Mr. Winters coming from the left of the
7 screen.

8 (Video plays.)

9 At 1 hour 52 minutes 34 seconds, do you see Deputy
10 Winters reach up with his right arm and place it on
11 Mr. Morgan's back?

12 MR. HICKEY: Object to the form.

13 A I see his right arm going up but I can't see for
14 that person sitting there. So, I really can't say yes or
15 no.

16 (Video plays.)

17 Q So, at 1 hour 52 minutes 46 seconds, we just heard
18 a comment from Mr. Donald Leonard. He's making a
19 comment. Ms. Mason was telling him "And you can be
20 next."

21 Did you see any behavior, at the time you were
22 there, from Mr. Leonard that would've justified removing
23 him from the commission meeting?

24 A Only he was being loud, but that's all. That's
25 all I heard, him being loud, speaking loudly to her, I

1 guess, or the commission.

2 Q And do you believe that that would've justified
3 removal from the commission meeting simply because he was
4 speaking loud?

5 MR. HICKEY: Object to the form.

6 A I really don't have an opinion, you know. I just
7 don't have an opinion.

8 Q As a law enforcement officer, do you believe that
9 you would've had justification to physically remove
10 Mr. Leonard at that point?

11 A No.

12 (Video plays.)

13 Q So at 1 hour 52 minutes and 53 seconds, Ms. Mason
14 is asking you to remove Mr. Leonard. Did you believe at
15 that point that Ms. Mason was justified in directing
16 Mr. Leonard's removal from the commission meeting?

17 MR. HICKEY: Object to the form.

18 A I believe that she thought that -- I believe that,
19 you know, she thought that he should be removed. So, she
20 asked me to do that, so I...

21 Q And you, as the sheriff of Marion County, did you
22 believe, if it was your decision, you would've had
23 justification to remove Mr. Leonard from the meeting at
24 that point?

25 MR. HICKEY: Object to the form.

1 A I probably would not have.

2 (Video plays.)

3 Q At 1 hour 53 minutes and 19 seconds, Ms. Mason
4 goes "This man..."

5 (Video plays.)

6 She's pointing her finger and saying "This man
7 right here needs to leave this building right now." That
8 was -- she was referring to Mr. Morgan, is what we've
9 established.

10 Do you believe that Ms. Mason was justified in
11 directing you, or whoever she was directing, Mr. Morgan
12 to be removed from the building?

13 MR. HICKEY: Object to the form.

14 A I think she thought she, you know, she had the
15 authority and thought he should be removed. I mean,
16 that's a decision she made.

17 Q You, as the sheriff of Marion County, do you
18 believe that -- would you have made the decision to
19 remove Mr. Morgan from the building at that point?

20 MR. HICKEY: Object to the form.

21 A Probably not. Probably not.

22 (Video plays.)

23 Q Sheriff, if you had to do it over again -- you
24 know, hindsight's 20/20 -- would you have done anything
25 different other than simply following the directions

1 from -- directions, request, or however you want to put
2 it, of Ms. Mason to remove Mr. Leonard and Mr. Morgan?

3 A No, I wouldn't do anything different.

4 MR. HICKEY: Object to the form.

5 Q Wouldn't have done anything different?

6 A No.

7 MR. FLORES: Okay. Well, Sheriff, that's all
8 I have.

9 (Signature not discussed.)

10 DEPOSITION CONCLUDED AT 2:19

11

12

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 SHERIFF RONNIE "BO" BURNETT was reported by me in machine shorthand, and that the foregoing 35 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

	Always (1) 8:13		6:23	clip (1) 7:7
#	Amendment (4) 12:25;21:17;22:6,13	B	building (4) 17:1;34:7,12,19	clothed (1) 16:14
#268 (1) 4:6	apologies (1) 9:11	back (7) 8:3;10:1;11:7; 17:13;20:13;22:22; 32:11	BURNETT (5) 4:1;5:1;6:11,15; 11:9	co-equal (1) 14:15
A	apology (1) 18:5	background (1) 5:12	C	coercion (2) 16:7,17
ability (1) 36:7	apply (2) 21:18;22:6	Basically (2) 7:2;22:13	call (2) 10:17;15:6	coercive (1) 16:2
accomplish (1) 16:12	appreciate (1) 5:10	basics (1) 22:14	called (1) 5:2	coming (2) 13:24;32:6
act (1) 14:5	approached (2) 12:17;23:14	baton (1) 16:18	calm (1) 10:24	commensurate (1) 19:13
acted (1) 15:16	appropriate (3) 25:8;27:3,23	bears (1) 7:12	can (26) 5:9;6:5,20;7:2,9; 8:5;10:11,15,16,17, 19,24;11:3,8;15:6; 16:12;21:15,25; 22:10;24:13;26:4,7; 29:1;31:4,21;32:19	comment (2) 32:18,19
acting (2) 12:4;28:4	approximately (1) 4:3	beginning (1) 4:3	case (6) 3:14,15,19;11:11; 23:18;36:9	comments (4) 26:1,22;27:5;29:23
actions (1) 28:1	area (1) 23:10	behalf (1) 4:2	cause (1) 23:24	commission (25) 6:25;8:6,9,15,17; 9:15;15:21;17:7,9; 19:13;20:17,17,25; 21:19,21;25:9;26:16; 27:4,15;29:6,14; 32:23;33:1,3,16
active (1) 19:9	argumentative (3) 29:10;30:7,11	behavior (1) 32:21	CERTIFICATE (1) 36:1	commissioner (2) 16:2;24:16
actually (4) 8:19;15:3;16:16; 31:21	arm (3) 32:2,10,13	belief (1) 14:10	certified (2) 9:8,18	commissioners (1) 21:22
added (1) 17:19	around (1) 13:3	believes (2) 19:4,8	certify (1) 36:5	committed (1) 19:5
address (2) 8:11;22:1	arrest (8) 10:19;12:22;13:20, 21,23;14:1;19:4,10	below (1) 36:11	chairman (9) 11:6;13:2;14:7; 24:17;25:1,9;27:4,14; 29:9	communications (1) 20:6
addressing (4) 21:18,23;26:5,16	arrested (1) 31:8	Besides (1) 16:21	chairperson (1) 16:22	community (1) 25:11
administrative (2) 15:1,5	assembly (1) 21:18	best (5) 5:14,24,25;12:19, 24	charge (3) 3:18;6:23,25	compare (1) 30:22
advisements (1) 23:11	assist (1) 14:6	better (1) 11:19	charges (2) 21:5;31:10	compel (1) 19:24
again (4) 11:15;16:5;18:18; 34:23	assistance (1) 11:21	biggest (1) 6:23	Chattanooga (1) 4:5	compelled (1) 19:19
against (2) 21:5;31:11	assuming (2) 29:24;30:10	blocking (1) 13:9	chemical (1) 18:14	concerning (1) 9:25
Agency (7) 3:8,9,11,13,16,18; 17:8	attached (1) 17:25	blow (1) 28:12	chief (1) 29:12	CONCLUDED (1) 35:10
agenda (3) 8:11,20;20:13	attempting (2) 19:9,10	blue (1) 31:25	choke (1) 18:12	conduct (2) 26:23;27:22
agendas (1) 8:17	attend (2) 8:8,9	BO (4) 4:1;5:1;6:12,15	citizens (2) 9:5;25:10	confused (1) 8:21
aggressive (1) 26:19	attending (1) 8:6	Board (2) 3:4;36:10	city (1) 14:25	Civil (2) 4:8;6:24
ago (1) 22:16	attention (1) 22:23	body (2) 27:15,15	claim (1) 16:21	class (1) 22:16
agree (9) 10:22;15:9;16:11; 21:4;22:3;24:19;26:4, 7;28:14	audience (1) 11:5	both (3) 11:7;28:8,9	clear (1) 16:6	containment (1) 23:10
ahead (3) 7:8,24;22:21	authority (3) 14:5;16:14;34:15	branch (1) 15:10		continuum (1) 23:20
aleck (2) 11:18;16:6	Authorization (3) 18:19,23;19:14	branches (2) 14:15,19		
alive (1) 30:15	authorized (2) 19:1,2	Brandt (2) 24:16,20		
almost (1) 10:23	available (1) 7:1	brief (2) 5:9;23:20		
	aware (4) 9:24;17:5,6,10	buddy (1) 26:17		
		budget (1)		

<p>contract (1) 3:12</p> <p>contract/agreement (1) 3:13</p> <p>contractor (1) 3:7</p> <p>conversation (2) 13:4;20:11</p> <p>conversations (1) 24:19</p> <p>copy (1) 7:16</p> <p>counsel (2) 3:15;36:8</p> <p>counselor (1) 5:25</p> <p>COUNTY (23) 3:2;6:14,18,25;8:6, 14;9:20;16:1;17:7,9; 20:7,17,25;21:16,18, 21,22;27:16,19; 29:12;33:21;34:17; 36:3</p> <p>couple (2) 8:16;22:18</p> <p>course (1) 10:7</p> <p>Court (7) 3:4,6,9;4:6;15:7; 36:4,10</p> <p>courtesy (2) 8:9,13</p> <p>courts (1) 6:25</p> <p>cover (1) 3:16</p> <p>covers (1) 22:13</p> <p>criminal (1) 21:4</p> <p>custody (1) 19:3</p> <p>customary (1) 3:19</p>	<p>decision (3) 33:22;34:16,18</p> <p>deem (1) 22:1</p> <p>de-escalate (2) 10:25;23:15</p> <p>de-escalating (1) 10:4</p> <p>de-escalation (6) 9:25;10:1,6,15; 23:1,5</p> <p>defend (1) 19:7</p> <p>department (2) 5:13;9:24</p> <p>department-approved (1) 19:1</p> <p>department's (1) 10:11</p> <p>deposition (13) 3:10,11,17;4:1,7; 5:15;6:5,7,8;9:13; 18:8;35:10;36:5</p> <p>deputies (3) 10:3;18:9;20:7</p> <p>Deputy (12) 10:8;13:14,20; 17:11;18:21;19:17, 22;20:9,14,15;23:13; 32:9</p> <p>describe (5) 6:20;8:5;11:3,7; 21:15</p> <p>described (1) 22:12</p> <p>deterring (1) 10:23</p> <p>deviate (2) 17:12;18:21</p> <p>dialogue (1) 28:6</p> <p>different (6) 14:15,18;15:16; 34:25;35:3,5</p> <p>differently (1) 15:16</p> <p>direct (1) 22:23</p> <p>directed (1) 15:13</p> <p>directing (3) 33:15;34:11,11</p> <p>direction (1) 16:1</p> <p>directions (2) 34:25;35:1</p> <p>disclosure (1) 3:5</p> <p>discount (1) 3:20</p> <p>discussed (2) 4:9;35:9</p> <p>discussions (1)</p>	<p>25:2</p> <p>disengagements (1) 23:9</p> <p>disruptive (4) 12:4,10;26:19; 28:21</p> <p>document (3) 7:8,22;17:18</p> <p>documents (2) 17:18;20:3</p> <p>Donald (1) 32:18</p> <p>done (6) 21:8;22:20;25:13; 27:9;34:24;35:5</p> <p>doubt (1) 7:18</p> <p>down (1) 10:24</p> <p>during (2) 12:3;27:16</p> <p>duties (1) 7:3</p>	<p>examined (1) 5:3</p> <p>example (1) 13:14</p> <p>exchange (1) 28:7</p> <p>executive (1) 15:10</p> <p>Exhibit (4) 8:1,18;17:17;22:22</p> <p>experience (1) 15:25</p> <p>Expiration (1) 36:20</p> <p>Expires (1) 36:21</p> <p>explain (2) 8:16;10:11</p> <p>explains (1) 22:17</p>	<p>30:22</p> <p>follow (5) 17:3;25:2,3,14,15</p> <p>following (6) 3:4;14:9,11,12; 23:20;34:25</p> <p>follows (1) 5:4</p> <p>force (16) 9:25;10:12,16,17, 17,20,20;17:15;18:12, 19,22,23;19:2,14; 23:12,20</p> <p>foregoing (1) 36:6</p> <p>forget (1) 9:11</p> <p>form (26) 12:16;13:18,25; 15:18;16:3;22:4;25:6; 26:20,24;27:6,10,24; 28:23;29:8;30:3,6,24; 31:14;32:5,12;33:5, 17,25;34:13,20;35:4</p> <p>forth (3) 5:13;8:3;11:7</p> <p>Forty-six (1) 30:16</p> <p>foul (1) 21:24</p> <p>Fourth (1) 22:14</p> <p>freedom (1) 21:17</p> <p>front (1) 25:10</p> <p>full (1) 6:10</p> <p>further (1) 18:13</p>
D		E	F	G
<p>dad (1) 21:1</p> <p>danger (1) 23:7</p> <p>date (1) 36:20</p> <p>dates (1) 8:21</p> <p>Dave (1) 26:9</p> <p>day (2) 13:8;36:12</p> <p>deadly (1) 10:20</p> <p>dealing (2) 8:17;18:22</p>	<p>direct (1) 22:23</p> <p>directed (1) 15:13</p> <p>directing (3) 33:15;34:11,11</p> <p>direction (1) 16:1</p> <p>directions (2) 34:25;35:1</p> <p>disclosure (1) 3:5</p> <p>discount (1) 3:20</p> <p>discussed (2) 4:9;35:9</p> <p>discussions (1)</p>	<p>effect (4) 10:23;19:3,9;28:20</p> <p>effecting (1) 19:9</p> <p>either (1) 13:19</p> <p>else (3) 13:14;16:23;20:16</p> <p>employee (1) 36:8</p> <p>enforcement (15) 9:17;12:13,14; 15:22,24,25;16:12; 22:15;28:4;29:11,12, 15,17;31:7;33:8</p> <p>engage (2) 24:18;25:1</p> <p>entire (2) 7:21;14:2</p> <p>escalated (1) 28:5</p> <p>escape (2) 19:3,11</p> <p>established (1) 34:9</p> <p>even (3) 8:19;21:24;23:19</p> <p>event (1) 25:21</p> <p>events (1) 11:3</p> <p>evidenced (1) 36:10</p> <p>Evidently (2) 21:11,12</p> <p>EXAMINATION (1) 5:5</p>	<p>failed (1) 6:9</p> <p>fair (1) 28:11</p> <p>familiar (2) 5:17;9:20</p> <p>farther (1) 7:4</p> <p>feasible (2) 23:6,9</p> <p>Federal (3) 4:8;14:20;15:8</p> <p>felt (1) 24:3</p> <p>filed (2) 21:5;31:10</p> <p>financial (1) 3:20</p> <p>find (3) 12:2;20:22,24</p> <p>fine (1) 12:8</p> <p>finger (2) 26:17;34:6</p> <p>fingers (1) 7:6</p> <p>finishing (1) 26:15</p> <p>first (8) 5:3;12:25;20:20; 21:17;22:5,13;28:11, 12</p> <p>fit (1) 22:1</p> <p>FLORES (4) 5:6;7:24;29:16; 35:7</p> <p>focus (1) 11:2</p> <p>folks (1)</p>	<p>Gallagher (2) 24:17,25</p> <p>gave (1) 20:12</p> <p>gavel (1) 24:18</p> <p>general (1) 27:20</p> <p>gentleman (1) 31:25</p> <p>gestures (1) 27:5</p> <p>gets (3) 6:24;10:16;30:19</p> <p>gist (1) 30:12</p> <p>given (6) 3:20;5:15;6:5,16; 25:8;27:3</p> <p>gives (1)</p>

10:3 goes (3) 18:11,13;34:4 governing (1) 27:15 government (8) 14:16,19,20,21,21, 23;15:10;27:19 Governor (1) 15:6 great-grandmother (1) 6:16 guess (5) 15:5;28:12;29:7; 30:7;33:1 guidelines (1) 17:6	holds (1) 18:12 hope (2) 27:11,12 hour (19) 10:6,7;24:11,22; 25:24;26:3,11,15; 28:15,18,25;29:19; 31:2,17,23;32:9,17; 33:13;34:3 hours (1) 22:8	J	32:18,22;33:10,14, 23;35:2 Leonard's (1) 33:16 lessen (1) 23:7 level (1) 23:7 Licensed (3) 3:6;4:5;36:4 Linda (1) 11:6 lines (1) 22:2 listen (3) 21:12;29:20,22 litigation (1) 3:21 live-streamed (1) 25:11 local (1) 14:21 location (1) 23:8 long (5) 6:17;14:2;21:23; 22:1,16 look (9) 7:5,8,21;16:13; 17:17;22:21;24:1; 26:18;29:25 looked (2) 7:23;13:8 looking (4) 18:18,20;19:12; 22:24 looks (2) 7:6;31:24 lot (3) 5:11;8:10,10 loud (5) 29:10;30:11;32:24, 25;33:4 loudly (2) 12:6;32:25	mark (1) 7:24 marked (1) 8:1 Market (1) 4:4 Mason (25) 5:19;11:20;14:13; 15:13;16:21;19:17; 20:7;21:14;25:3,19, 25;26:5,17;28:12; 29:1,19;30:1;31:4,4; 32:19;33:13,15;34:3, 10;35:2 Mason's (3) 11:25;26:22;30:21 may (1) 9:8 maybe (1) 18:3 may've (1) 13:7 mean (5) 6:22;16:9;27:25; 30:14;34:15 means (1) 16:7 meat (1) 8:24 meeting (26) 8:15,19,22;11:3,10, 12:12;1:3;14:6;19:13, 15,20,23;20:4,9,17; 21:6,9;25:10;29:6,14; 31:8;32:23;33:3,16, 23 meetings (9) 7:1;8:7,18;9:4,22; 17:9;21:19,21;22:6 member (2) 15:21;20:18 members (2) 10:4;17:8 might (1) 3:16 might've (2) 32:1,2 mine (1) 10:10 minute (1) 26:3 minutes (18) 8:17;24:12,22; 25:24;26:3,11,15; 28:15,18,25;29:19; 31:2,17,23;32:9,17; 33:13;34:3 mission (1) 16:12 moment (1) 23:20 month (1) 20:13
H	I	K	L	M
HAMILTON (2) 3:2;36:3 hand (4) 13:7;31:24;32:4; 36:12 handcuff (1) 10:18 handle (1) 16:23 handling (1) 9:4 hands (4) 10:17;13:11,13; 23:19 hard (1) 30:9 harm (3) 23:24;24:3,5 hear (4) 14:1;26:5,12;30:23 heard (5) 25:3;26:16;28:6; 32:17,25 heated (1) 28:7 helpful (1) 16:16 hereby (1) 36:5 HICKEY (28) 12:16;13:18,25; 15:18;16:3;17:24; 22:4;25:6;26:20,24; 27:6,10,24;28:23; 29:8,15;30:3,6,24; 31:14;32:5,12;33:5, 17,25;34:13,20;35:4 himself (1) 26:12 hindsight's (1) 34:24 holding (1) 27:18	identifying (1) 26:12 impact (2) 18:12,13 impression (1) 30:5 inappropriate (1) 27:23 incident (2) 14:2;20:6 independent (1) 3:7 individuals (1) 9:22 inflicting (1) 24:4 information (1) 20:12 inservice (2) 10:5;22:7 instance (1) 5:2 instructed (1) 16:22 instructions (1) 23:16 intent (1) 23:23 intention (1) 23:17 interaction (3) 5:18;11:4;20:3 interactions (2) 9:5;10:12 interrogatory (1) 7:11 Intimidate (1) 16:10 into (4) 5:12;8:24;9:1; 25:21 involuntarily (1) 29:6 involved (1) 23:7 involving (3) 10:4;14:2;20:3	keep (1) 11:16 kind (6) 13:15,15;18:7; 23:15;24:4;25:2 knowledge (2) 20:16;36:7	language (1) 21:25 last (5) 6:7;10:10,20;14:3; 29:4 later (1) 29:4 law (18) 9:17;12:13,14; 15:21,24,25;16:11; 22:15;25:15,15;28:3; 29:11,12,15,17;31:7, 9;33:8 lawful (1) 19:3 LCR#268 (1) 3:22 leave (8) 12:20,23;13:1,2; 16:2;19:15;23:21; 34:7 led (1) 11:3 left (4) 13:3;16:24;31:12; 32:6 legislative (3) 15:3,4;27:15 Leonard (6)	making (5) 10:19;13:9,23; 29:23;32:18 man (2) 34:4,6 manner (1) 12:4 many (1) 30:15 march (1) 28:15 Marion (9) 6:14,17;8:14;9:20; 21:16;27:16;29:12; 33:21;34:17

<p>more (3) 7:3;26:5;28:6</p> <p>Morgan (41) 11:4,5,21;12:1,3,9; 13:16,19;14:3,6,8; 15:15,17,20;16:23; 17:2;19:13,18;20:3; 21:5;23:21;24:3; 25:22;26:4,12,16,18, 23;27:5;28:6,13,18, 20;29:4;30:1,22;31:3; 34:8,11,19;35:2</p> <p>Morgan's (2) 20:8;32:11</p> <p>moving (1) 23:8</p> <p>much (2) 7:4;13:13</p> <p>multiple (1) 10:22</p> <p>myself (1) 22:16</p>	<p>observation (1) 29:25</p> <p>observations (1) 12:11</p> <p>observe (2) 12:3,9</p> <p>occasions (1) 6:6</p> <p>occurred (1) 8:19</p> <p>October (1) 36:12</p> <p>offense (1) 19:5</p> <p>Office (5) 9:21;10:3;17:3,11, 14</p> <p>Officer (12) 9:14,17;12:14; 16:14;19:4,8;28:4; 29:11,12;30:14;31:7; 33:8</p> <p>officers (9) 10:14,23;15:22,25; 16:1,12;19:1;22:5; 23:6</p> <p>offices (1) 4:4</p> <p>official (1) 20:8</p> <p>one (12) 7:6;8:18;12:2;15:2; 17:23;22:19;24:19; 27:1;28:2,12;30:17; 31:20</p> <p>only (3) 13:4;25:10;32:24</p> <p>opinion (17) 12:5,7,12,12,13; 21:20;25:19;26:22, 25;27:2,7,25;28:2,22; 29:9;33:6,7</p> <p>opinionated (2) 25:4,15</p> <p>order (2) 20:17;25:3</p> <p>ordered (1) 15:13</p> <p>ordering (2) 14:13;15:14</p> <p>orders (1) 14:9</p> <p>others (1) 19:8</p> <p>otherwise (1) 5:8</p> <p>out (2) 5:8;7:7</p> <p>outcome (1) 36:9</p> <p>outside (3) 17:7;20:10,11</p> <p>over (6)</p>	<p>5:23,25;7:23;22:2; 28:20;34:23</p> <p>overall (1) 10:13</p> <p>overview (2) 6:6;22:10</p> <p>own (3) 19:19,20;23:21</p>	<p>plays (18) 24:15,24;25:23; 26:2,8,10,14;28:17, 24;29:18;31:1,19; 32:8,16;33:12;34:2,5, 22</p> <p>please (1) 6:2</p> <p>PLLC (1) 4:4</p> <p>pm (1) 4:3</p> <p>podium (1) 11:6</p> <p>point (24) 10:16;11:8;12:2,3, 8;23:23;26:19,23; 28:5,11,20;29:3,14; 31:6,10,13,15,17,21; 32:2;33:10,15,24; 34:19</p> <p>pointing (2) 26:17;34:6</p> <p>police (3) 16:14,17;30:14</p> <p>policies (10) 5:13;9:21,24;10:2; 17:11,12,14,24,25; 22:22</p> <p>policy (8) 10:12;17:3,21;18:8, 21,25;19:12;22:24</p> <p>position (4) 10:18;24:7;27:4,19</p> <p>POST (3) 9:8,13,18</p> <p>potatoes (1) 8:24</p> <p>practice (1) 23:6</p> <p>prepare (1) 20:2</p> <p>presence (1) 16:13</p> <p>present (2) 8:14;21:9</p> <p>president (1) 15:6</p> <p>prevent (2) 19:3,10</p> <p>preventing (1) 19:10</p> <p>prior (2) 8:24;15:20</p> <p>probably (7) 5:17;14:4;27:12; 28:8;34:1,21,21</p> <p>Procedure (1) 4:8</p> <p>Procedures (1) 22:24</p> <p>process (1) 6:24</p>	<p>producing (1) 8:2</p> <p>production (1) 17:19</p> <p>prohibited (1) 3:12</p> <p>prongs (1) 7:7</p> <p>protections (1) 21:17</p> <p>Protects (1) 19:7</p> <p>provide (2) 3:9,14</p> <p>provisions (1) 4:8</p> <p>Public (8) 4:6;9:4,22;10:13; 17:8;22:6;25:20,25</p> <p>Pursuant (2) 3:3;4:7</p> <p>put (7) 5:21;10:18;12:8; 13:7;21:13;32:4;35:1</p> <p>putting (2) 10:17;23:19</p>
N				
<p>name (1) 6:10</p> <p>nature (1) 16:2</p> <p>necessary (1) 18:5</p> <p>need (5) 12:20,23;13:2; 15:15;26:5</p> <p>needs (1) 34:7</p> <p>next (3) 7:13;20:13;32:20</p> <p>night (1) 21:3</p> <p>Non-Deadly (5) 18:19,22,23;19:2, 14</p> <p>nor (1) 36:8</p> <p>Notary (1) 4:6</p> <p>number (1) 23:10</p> <p>numbered (2) 7:10,11</p>	<p>officers (9) 10:14,23;15:22,25; 16:1,12;19:1;22:5; 23:6</p> <p>offices (1) 4:4</p> <p>official (1) 20:8</p> <p>one (12) 7:6;8:18;12:2;15:2; 17:23;22:19;24:19; 27:1;28:2,12;30:17; 31:20</p> <p>only (3) 13:4;25:10;32:24</p> <p>opinion (17) 12:5,7,12,12,13; 21:20;25:19;26:22, 25;27:2,7,25;28:2,22; 29:9;33:6,7</p> <p>opinionated (2) 25:4,15</p> <p>order (2) 20:17;25:3</p> <p>ordered (1) 15:13</p> <p>ordering (2) 14:13;15:14</p> <p>orders (1) 14:9</p> <p>others (1) 19:8</p> <p>otherwise (1) 5:8</p> <p>out (2) 5:8;7:7</p> <p>outcome (1) 36:9</p> <p>outside (3) 17:7;20:10,11</p> <p>over (6)</p>	<p>page (11) 7:9,12,13;17:20,24; 18:11,13,18,20;22:23, 25</p> <p>pages (1) 36:6</p> <p>paper (1) 7:7</p> <p>part (2) 10:5,20</p> <p>particular (2) 17:3;23:18</p> <p>particularly (2) 8:18;18:22</p> <p>parties (4) 3:19;28:8,9;36:8</p> <p>party (2) 3:14,20</p> <p>past (2) 5:15;6:5</p> <p>Peace (1) 9:14</p> <p>people (2) 6:14;21:18</p> <p>person (5) 19:4;21:23;30:17, 19;32:14</p> <p>personal (1) 12:12</p> <p>persuade (1) 23:21</p> <p>persuasion (1) 23:11</p> <p>persuasive (1) 23:16</p> <p>pertain (1) 8:6</p> <p>physical (4) 13:5,10,15;23:24</p> <p>physically (2) 31:8;33:9</p> <p>pick (1) 5:23</p> <p>place (1) 32:10</p> <p>placed (2) 5:3;13:20</p> <p>Plaintiff (4) 4:3;5:2;12:17; 23:14</p> <p>play (1) 24:22</p>	<p>producing (1) 8:2</p> <p>production (1) 17:19</p> <p>prohibited (1) 3:12</p> <p>prongs (1) 7:7</p> <p>protections (1) 21:17</p> <p>Protects (1) 19:7</p> <p>provide (2) 3:9,14</p> <p>provisions (1) 4:8</p> <p>Public (8) 4:6;9:4,22;10:13; 17:8;22:6;25:20,25</p> <p>Pursuant (2) 3:3;4:7</p> <p>put (7) 5:21;10:18;12:8; 13:7;21:13;32:4;35:1</p> <p>putting (2) 10:17;23:19</p>	
O				
<p>oath (1) 5:3</p> <p>Object (26) 12:16;13:18,25; 15:18;16:3;22:4;25:6; 26:20,24;27:6,10,24; 28:23;29:8;30:3,6,24; 31:14;32:5,12;33:5, 17,25;34:13,20;35:4</p>	<p>officers (9) 10:14,23;15:22,25; 16:1,12;19:1;22:5; 23:6</p> <p>offices (1) 4:4</p> <p>official (1) 20:8</p> <p>one (12) 7:6;8:18;12:2;15:2; 17:23;22:19;24:19; 27:1;28:2,12;30:17; 31:20</p> <p>only (3) 13:4;25:10;32:24</p> <p>opinion (17) 12:5,7,12,12,13; 21:20;25:19;26:22, 25;27:2,7,25;28:2,22; 29:9;33:6,7</p> <p>opinionated (2) 25:4,15</p> <p>order (2) 20:17;25:3</p> <p>ordered (1) 15:13</p> <p>ordering (2) 14:13;15:14</p> <p>orders (1) 14:9</p> <p>others (1) 19:8</p> <p>otherwise (1) 5:8</p> <p>out (2) 5:8;7:7</p> <p>outcome (1) 36:9</p> <p>outside (3) 17:7;20:10,11</p> <p>over (6)</p>	<p>page (11) 7:9,12,13;17:20,24; 18:11,13,18,20;22:23, 25</p> <p>pages (1) 36:6</p> <p>paper (1) 7:7</p> <p>part (2) 10:5,20</p> <p>particular (2) 17:3;23:18</p> <p>particularly (2) 8:18;18:22</p> <p>parties (4) 3:19;28:8,9;36:8</p> <p>party (2) 3:14,20</p> <p>past (2) 5:15;6:5</p> <p>Peace (1) 9:14</p> <p>people (2) 6:14;21:18</p> <p>person (5) 19:4;21:23;30:17, 19;32:14</p> <p>personal (1) 12:12</p> <p>persuade (1) 23:21</p> <p>persuasion (1) 23:11</p> <p>persuasive (1) 23:16</p> <p>pertain (1) 8:6</p> <p>physical (4) 13:5,10,15;23:24</p> <p>physically (2) 31:8;33:9</p> <p>pick (1) 5:23</p> <p>place (1) 32:10</p> <p>placed (2) 5:3;13:20</p> <p>Plaintiff (4) 4:3;5:2;12:17; 23:14</p> <p>play (1) 24:22</p>	<p>producing (1) 8:2</p> <p>production (1) 17:19</p> <p>prohibited (1) 3:12</p> <p>prongs (1) 7:7</p> <p>protections (1) 21:17</p> <p>Protects (1) 19:7</p> <p>provide (2) 3:9,14</p> <p>provisions (1) 4:8</p> <p>Public (8) 4:6;9:4,22;10:13; 17:8;22:6;25:20,25</p> <p>Pursuant (2) 3:3;4:7</p> <p>put (7) 5:21;10:18;12:8; 13:7;21:13;32:4;35:1</p> <p>putting (2) 10:17;23:19</p>	
Q				
R				
		<p>queue (1) 9:1</p>		
		<p>rates (1) 3:19</p> <p>rather (1) 16:17</p> <p>reach (1) 32:10</p> <p>reader (1) 18:8</p> <p>ready (3) 7:22,23;9:2</p> <p>really (9) 12:5;26:25;27:1,1, 25;28:2;30:10;32:14; 33:6</p> <p>reason (2) 7:18;31:6</p> <p>reasonably (1) 19:8</p> <p>recall (2) 8:22;13:5</p> <p>receive (1) 22:5</p> <p>received (1) 9:3</p> <p>reckon (1) 29:23</p> <p>recollection (2) 12:19,24</p> <p>record (2)</p>		

<p>9:13;16:6 reference (1) 8:25 referencing (1) 8:3 referral (1) 3:16 referring (1) 34:8 regard (1) 11:21 regarding (7) 9:4,21;10:3,12; 17:12,14;20:8 regular (1) 30:14 regularly (1) 21:2 Regulations (1) 3:3 relinquishing (1) 24:18 remember (4) 12:21;13:8,9;21:11 reminding (1) 11:16 removal (7) 9:21;17:4,12;19:12; 20:8;33:3,16 remove (13) 12:1;14:5;15:15; 16:17;19:18,19,22; 31:5;33:9,14,23; 34:19;35:2 removed (13) 11:9,10;17:2;20:16; 21:2;29:1,5,30,12; 31:8,13;33:19;34:12, 15 removing (6) 14:6,8;15:20;17:8; 29:13;32:22 rephrase (1) 6:4 Reporter (4) 3:6,15;4:6;36:4 REPORTER'S (1) 36:1 Reporting (10) 3:4,7,9,10,10,13,14, 15,18;36:10 reports (1) 20:2 repositioning (1) 23:7 representative (1) 27:19 request (7) 11:25;14:7,11,12; 16:1;17:19;35:1 requested (3) 11:20;15:14;16:22 require (1)</p>	<p>18:9 required (3) 8:8,12;10:6 requires (1) 10:12 resistance (1) 19:9 resorting (1) 23:12 responded (1) 31:4 response (2) 12:21;30:21 responsibilities (3) 6:20,22;8:5 restrictions (1) 18:11 result (1) 21:5 review (2) 7:9;22:18 right (18) 7:2;13:5,11,14; 17:2;18:7,12;20:1; 21:20;24:1,9;27:20; 28:3;31:23;32:10,13; 34:7,7 rights (2) 12:25;22:6 RONNIE (3) 4:1;5:1;6:11 Rudstrom (1) 4:4 Rules (6) 3:3;4:8;17:6;25:2,4, 14</p>	<p>9:8;11:18 September (1) 4:2 served (1) 6:24 services (2) 3:10,14 Several (2) 6:22;29:3 shall (1) 23:11 Sheila (3) 3:22;4:5;36:4 SHERIFF (32) 4:1;5:1,7;6:17,21; 7:6,8,13;8:2,6;11:9; 12:14;15:9;17:17; 20:2;21:10,15,16; 22:21;24:9,11;25:13, 18;27:9;30:5,13;31:6, 13;33:21;34:17,23; 35:7 sheriff's (6) 5:12;9:21;10:3; 17:3,11,14 shirt (1) 31:25 shorthand (1) 36:6 shot (1) 31:22 shoulder (1) 13:7 Signature (6) 4:9;7:12,14,16,19; 35:9 silly (1) 9:7 simply (6) 16:13;30:1,18,23; 33:3;34:25 sit (3) 11:24;24:2;29:20 sitting (1) 32:14 situation (1) 28:5 situations (2) 10:4;30:17 skills (1) 36:7 smart (2) 11:18;16:5 soft (4) 10:16,17;13:11,13 somebody (4) 10:18,24;16:17; 25:14 someone (1) 14:9 someone's (1) 31:24 sometimes (1)</p>	<p>16:11 sorry (4) 9:11;11:15;18:3,4 source (1) 5:14 speak (6) 11:23;12:6;18:20, 25;20:13;28:19 speaking (2) 32:25;33:4 speaks (2) 23:4;31:20 specifically (3) 9:3;19:16,18 speech (1) 21:18 Spicer (1) 4:4 spoke (1) 20:9 spray (1) 18:14 St (1) 4:4 Standards (1) 9:14 stands (1) 9:14 start (3) 5:7;22:22;24:11 starting (1) 17:20 state (5) 9:17;14:21,25;31:9; 36:2 statements (1) 29:24 statutorily (1) 8:12 steps (1) 15:16 sticking (1) 7:7 straight (2) 16:18;22:19 struck (1) 28:12 Su (1) 4:4 subheading (1) 18:19 summary (1) 24:16 supposed (1) 25:1 Supreme (1) 15:7 sure (5) 6:24;7:2;9:2;15:2; 24:6 system (1) 15:8</p>	<p>T tactic (2) 13:12;16:16 tactical (1) 23:6 tactics (1) 10:1 talk (2) 5:23,25 talked (1) 22:11 talking (8) 14:20,22;15:4; 17:21;20:14;24:20; 28:19;29:21 talks (4) 18:14;23:4,9,10 tasers (2) 10:20;18:16 TCA (1) 3:12 techniques (1) 19:2 telling (2) 15:15;32:19 tend (1) 5:23 Tennessee (8) 3:3,6;4:5;9:18; 27:16;36:2,5,10 term (1) 16:7 terms (1) 4:7 testified (1) 5:4 thinking (1) 30:9 third (1) 15:2 Thomas (2) 5:18;6:9 Thompson (1) 26:9 though (2) 8:20;30:5 thought (5) 30:4;33:18,19; 34:14,15 threatened (1) 13:20 threatening (3) 12:4,10;21:24 threats (2) 13:23;14:1 three (2) 14:18;22:14 times (3) 8:10,10;27:12 today (2) 24:2;29:21</p>
	S			

told (1) 12:19 took (2) 10:10;22:16 topics (1) 24:20 touched (1) 32:2 to've (1) 31:7 toward (1) 26:23 training (9) 9:3,14;10:2,5,9; 22:5,7,9,11 try (6) 5:9,21;10:24,24; 23:20;30:13 trying (1) 23:15 turned (1) 13:3 turns (1) 5:8 Twenty-three (1) 6:19 two (2) 15:25,25 type (2) 10:8;13:12	verbalize (1) 5:22 versa (1) 5:23 vice (1) 5:23 video (28) 5:11;8:25;11:11,23; 13:8;22:19;24:2,10, 13,15,24;25:23;26:2, 8,10,14;28:17,24; 29:18;31:1,19,20; 32:8,16;33:12;34:2,5, 22 violating (1) 12:25 violation (1) 31:9 violence (1) 21:24 voice (1) 28:2		4:2
		Y	29 (3) 8:15,19;20:4 29th (2) 11:2,12 3
U	W	1	30 (2) 26:15;28:16 34 (1) 32:9 35 (1) 36:6 37 (2) 24:11,22 39 (1) 26:4
		1 (20) 23:10;24:11,22; 25:24;26:3,3,11,15; 28:15,18,18,25;29:19; 31:2,17,23;32:9,17; 33:13;34:3 1/17/2027 (1) 36:21 1:26 (1) 4:3 15 (2) 14:4;29:19 16 (3) 8:1;17:17;22:22 17 (1) 31:23 19 (4) 7:11;22:23,25;34:3 1980 (1) 20:25	4
under (5) 3:11;5:3;12:22; 13:20;18:18 unusual (3) 20:22,24;21:3 up (12) 5:23;9:1;10:1;11:3; 17:13;19:22;26:15; 31:12,24;32:3,10,13 upon (2) 14:5;30:5 upset (2) 30:19,23 use (19) 9:25;10:11,15,16, 17,19,20;13:15;15:7; 17:15,20;18:19,22,23; 19:1,14;22:15;23:9, 11 used (1) 10:24 using (3) 16:17;21:24;23:15 usual (1) 3:18	walk (2) 18:7;20:10 warning (1) 23:11 watch (2) 7:5;32:6 way (5) 18:21;28:4;29:25; 30:13;31:25 weapons (3) 18:12,14;19:2 week (1) 10:10 weren't (1) 21:9 whole (1) 17:7 Wilson (8) 3:7,9,10,13,18,22; 4:5;36:4 Winters (14) 10:8;13:15,20; 17:12;18:21;19:18, 22;20:9,14,15;23:13; 32:3,6,10 wish (1) 25:12 witness (2) 4:9;5:2 word (1) 30:13 words (2) 16:21;19:16 work (1) 10:19 written (2) 17:6;20:2	2	5
		2:19 (1) 35:10 20 (1) 14:4 20/20 (1) 34:24 2024 (4) 8:15;20:4;21:6,9 2025 (2) 4:2;36:12 203 (1) 4:4 20th (1) 36:12 22 (5) 17:20,24;18:18,20; 20:4 22nd (1) 8:20 23 (3) 18:11;20:19;24:23 24 (2) 18:13;31:2 24-9-136 (1) 3:12 25 (1) 31:18 26 (1) 25:24 26th (1)	4 (1) 28:25 4.0 (1) 22:24 40 (1) 22:8 46 (1) 32:17 5
V	W	2	5 (2) 8:18;23:5 50 (3) 25:24;26:3,11 51 (2) 26:15;28:15 52 (9) 28:18,25;29:19; 31:2,17,23;32:9,17; 33:13 53 (2) 33:13;34:3 537 (1) 4:4 57 (1) 26:11
		6	6/30/2026 (1) 36:20
verbal (2) 10:15;23:16	walk (2) 18:7;20:10 warning (1) 23:11 watch (2) 7:5;32:6 way (5) 18:21;28:4;29:25; 30:13;31:25 weapons (3) 18:12,14;19:2 week (1) 10:10 weren't (1) 21:9 whole (1) 17:7 Wilson (8) 3:7,9,10,13,18,22; 4:5;36:4 Winters (14) 10:8;13:15,20; 17:12;18:21;19:18, 22;20:9,14,15;23:13; 32:3,6,10 wish (1) 25:12 witness (2) 4:9;5:2 word (1) 30:13 words (2) 16:21;19:16 work (1) 10:19 written (2) 17:6;20:2	2	6