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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
CHATTANOOGA

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THOMAS WILLIAM MORGAN, :  
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 :  
 Plaintiffs, :  
 :  
 :  
 vs. : NO: 1:24-CV-00303  
 :  
 :  
 MARION COUNTY GOVERNMENT, LINDA :  
 MASON, RONNIE "BO" BURNETT, and :  
 DALE WINTERS, :  
 :  
 :  
 Defendants. :  
 :  
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Chattanooga, Tennessee  
September 12, 2025

DEPOSITION OF THOMAS WILLIAM MORGAN

-----  
APPEARANCES:

FOR THE PLAINTIFF:  
  
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FOR THE DEFENDANTS:  
  
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REPORTER'S CERTIFICATE

STATE OF TENNESSEE )

COUNTY OF HAMILTON )

I, Beth Ann Pell, LCR #267 and Notary Public, do hereby certify that I reported in machine shorthand the deposition of THOMAS WILLIAM MORGAN, called as a witness in the above-styled cause; that the said witness was duly sworn by me; that the foregoing pages, numbered from 1 to 150 inclusive, were typed under my personal supervision and constitutes a true record of said deposition.

I further certify that I am not an attorney or counsel of any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the outcome of the action.

Witness my hand in the City of Chattanooga, County of Hamilton, State of Tennessee, this 10th day of October, 2025

BETH ANN PELL, LCR #267  
Court Reporter and Notary Public  
My Commission Expires: 10/12/2025

1 Q Do you remember actual words that he said?

2 A I don't.

3 Q Was this conversation or, or interaction that  
4 you had with Dale -- I don't -- I don't know if  
5 conversation is the right word or not. But was this  
6 interaction that you had with Dale, was this outside --  
7 outside of the building?

8 A It was in the front entrance of the lobby to the  
9 exterior of the building.

10 Q Do you believe that the county commission can  
11 put restrictions on what is said or presented during  
12 the public comments portion of a county commission  
13 meeting?

14 A It's got to be germane to what was on the  
15 agenda.

16 Q And are you contending that there's anything  
17 wrong with that?

18 A No.

19 Q When you say "germane to anything that's on the  
20 agenda", do you mean that what is brought up during the  
21 public comment section has to relate to an agenda  
22 matter?

23 A Yeah. It can't just -- it's got to be on the  
24 agenda. I can't just start talking about random things  
25 that do not pertain.



1 Q And you're not making a complaint about that in  
2 this lawsuit. Meaning, you're not complaining that  
3 it's an improper limitation on speech to require public  
4 comments to pertain to agenda matters.

5 A No.

6 Q Okay. And are you contending that it's --  
7 that's it an improper act by the county commission to  
8 place time limitations on presentations by the public  
9 either in the agenda portion of the -- either -- that  
10 are on the agenda, or public comments?

11 A I believe it's a limitation on free speech if  
12 you put a time limit on someone that's on the agenda.  
13 But if there's a time limit on the public comment  
14 section, it's to keep order to the meeting.

15 Q And there's no complaint about that being  
16 improper being made in this case; is that correct?

17 A Correct.

18 Q All right. Is there a procedure, based on your  
19 observations, that is followed by the county commission  
20 at meet -- county meetings? Meaning they follow the  
21 same protocol at each one?

22 A No.

23 Q So they're all different.

24 A Over the past few years, yes.

25 Q How so?

1 meeting.

2 Q Okay. And does this appear to be a, a correct  
3 copy of the agenda based on what was handed out at that  
4 meeting that you received?

5 A Yes.

6 Q All right. And these were -- these were all of  
7 the -- these -- this agenda sets forth all of the  
8 agenda matters that were to be discussed during that,  
9 during that meeting.

10 A Correct.

11 Q About how long did the meeting last?

12 A I believe it was approximately two hours total.

13 Q Okay. Number 17 has Donald Leon -- excuse me --  
14 Donald Leonard-Pulltight Road.

15 A Correct.

16 Q And that's, that's the extent of what's on  
17 there.

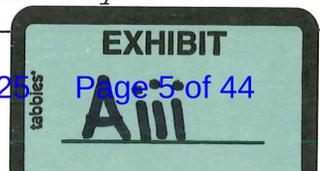
18 A Yeah.

19 Q Do, do you recall what he discussed? You  
20 mentioned earlier about shootings.

21 A Yes.

22 Q Is that -- was that what he brought up during  
23 the meeting?

24 A Public safety was definitely one of the primary  
25 concerns. It was also about the drug activity that was



1 going on at Pulltight Road and his lack of response  
2 from the sheriff's department. That is why he went to  
3 the county commission.

4 Q By the way, I think we have just been referring  
5 to the January meeting throughout this deposition as  
6 January 2024 meeting. I don't think we assigned a date  
7 to it.

8 A Yeah. I think it's just the January 2024.

9 Q Yeah. But if -- if we have in our discussions  
10 stated January 22nd, okay, you and I both agree that  
11 the minutes reflected was the 29th, and that sounds  
12 right to you.

13 A Correct.

14 Q Okay. That's not an issue, right?

15 A No.

16 Q It's not a big deal.

17 And you spoke in the public -- during the public  
18 comments --

19 A I did.

20 Q -- portion of this meeting?

21 A I did.

22 Q Okay.

23 A Or attempted to.

24 Q By the way, I have seen some -- somewhere in  
25 some information in reference to the commission meeting

1 been a typo.

2 MR. HICKEY: Okay.

3 THE WITNESS: I'm sorry.

4 MR. HICKEY: It, it happens. No big  
5 deal.

6 Mark that as the next one, please.

7 (Exhibit 6 was marked for identification.)

8 BY MR. HICKEY:

9 Q Marked as No. 6, these are the minutes that were  
10 produced from the January 29, 2024 meeting.

11 Have you reviewed these before?

12 A I have not.

13 Q Okay. You can take whatever time you, you like.  
14 What I -- what I want to ask you is if -- well, first  
15 of all, let me ask this. Do you understand what  
16 minutes from a meeting are?

17 A Yes.

18 Q That it's -- it's not a verbatim account of  
19 everything that happened, but rather a summary of  
20 substance of what took place during the meeting?

21 A Yeah.

22 Q Would you agree with that?

23 A Yes.

24 Q Okay. Then take a moment and just look through  
25 this and, and tell me if you'd agree that this is an

1 A Yes.

2 Q Okay. So did he -- did he -- is that where the  
3 railroad signs are?

4 A Pulltight Road is two-tenths of a mile long and  
5 goes -- basically consists of going over the railroad  
6 crossing.

7 Q What I'm -- what I'm just trying to figure out  
8 is if, if this is a different location or --

9 A No. It's the same location. But, I mean, it's  
10 mislabeled. It says the intersection of 299 Pulltight  
11 Road and Old Whiteside Road.

12 Q Okay. But -- but the, the statement that he  
13 spoke on his concerns of gunshots is accurate.

14 A Yes.

15 Q And it goes on to say, and he -- and expressed  
16 how much worse it's been in the past couple of days.

17 Does that sound about right?

18 A Yes.

19 Q And it says (as read) Sheriff Burnett, being  
20 present in the audience, stated he would have more  
21 patrol in that area for a while.

22 Do you recall him saying that?

23 A I do recall him saying that. But some of -- how  
24 it happened, Linda Mason was like, "Is the Sheriff  
25 here? We'll have the Sheriff solve that problem. I



1 know he can handle it", and got the Sheriff to stand up  
2 and say that.

3 Q Okay. Well, I understand that there may, may  
4 have been other things said during this presentation,  
5 but this is just a summary of, of what was discussed.  
6 And I want to make sure that the summary at least is,  
7 is accurate.

8 A I mean, it's partially accurate. He also talked  
9 about the drug problem happening over there.

10 Q So the public safety that you mentioned would be  
11 the, the gunshots. I mean, obviously it's -- gunshot's  
12 public safety, right?

13 A The gunshots, the drugs, and the dangerous  
14 railroad crossing.

15 Q Well, he didn't bring up -- Donald Leonard  
16 didn't bring up the dangerous railroad crossing, did  
17 he?

18 A He was concerned, because they were shooting at  
19 the railroad crossing sign, and it's the little bit of  
20 safety infrastructure that we have there.

21 Q Well, what I'm, what I'm saying is, the railroad  
22 crossing -- his, his presentation related to the  
23 gunshots that were being fired there.

24 A It -- it related to the drugs and the gunshots.

25 Q Okay.



1 Q Okay. So you don't think the sheriff agreeing  
2 in a county commission meeting to increase patrol is  
3 acting responsibly? Is that what I'm understanding?

4 A I believe that was lip service.

5 Q Okay. So what, what are they supposed to do?  
6 Threaten to withhold funds if the sheriff doesn't do  
7 something that Mr. Leonard wants him to do?

8 A That's one potential outcome.

9 Q Okay.

10 A We weren't asking for any recourse or  
11 retribution. We were trying to bring light to the  
12 public and get them to take action and handle the crime  
13 problem.

14 Q Get who to take action?

15 A The county commission and the sheriff. And put  
16 public responsibility on him versus the call down to  
17 the sheriff's office and them sending an agent out and  
18 nothing ever happening.

19 Q So what else was -- what else then was supposed  
20 to happen?

21 A Arrest the drug dealers. Arrest the people that  
22 are, are openly threatening people on -- or openly  
23 threatening people.

24 Q Do you know if they did anything in that respect  
25 to investigate?



1 Q And are these the issue that you attempt --  
2 issues you attempted to bring up in the January 2024  
3 meeting?

4 A In the Jan -- I was making reference to that.  
5 It was the fact that they were spending \$2 million and  
6 manipulating federal funds I was trying to address,  
7 before they interrupted and removed me.

8 Q Okay. How long are these video sessions?

9 A Typically an hour.

10 Q So did the railroad say that if the paperwork,  
11 whatever that means, were initiated to make this  
12 crossing a quiet zone, that they were okay with it, or  
13 they wouldn't blow the horn or anything of that nature?

14 A No. To start the quiet zone, paperwork has to  
15 by filled out by the county and a feasibility study's  
16 been done.

17 Q Who does that?

18 A CSX.

19 Q So they didn't comment then on what they may be  
20 willing to do or concede. It was just discussing how  
21 it would work.

22 A Yeah.

23 Q Okay. And CSX does the feasibility study.

24 A Yes.

25 Q Had you addressed the Marion County commission



1 MR. HICKEY: Thank you, Robin.

2 BY MR. HICKEY:

3 Q Did I -- if I said minutes, I meant agenda.

4 A I was speaking to the fact that they were trying  
5 to use \$2 million on --

6 Q Hold on. Hold on. Just which, which number  
7 does it correspond to on the agenda?

8 A It was -- well, Don Leonard's, number...

9 Q You see --

10 A Number 17. Sorry.

11 Q That's all right.

12 A They'd also talked about the updates for number  
13 9, where they were trying to spend \$2 million on Brow  
14 Trail Road or Big Fork Road.

15 Q And how did the comments that you were making  
16 that -- or that you did make to the agenda, relate  
17 to -- excuse me. During the public comment section  
18 relate to number 9 on the agenda?

19 A I'd introduce myself saying about Donald  
20 Leonard. I'm the owner of the campground at Pulltight  
21 Road. I was trying to make a point to the fact that  
22 they were spending \$2 million out of the general budget  
23 for a road that has no homes on it, that they do not  
24 own, but yet they could not take care of the roads that  
25 they have.

1 Q So the only -- the only thing about Brown --  
2 Brow Trail Road is the fact that money's being spent  
3 there, but not spent at Pulltight Road.

4 A They don't even own --

5 Q Hold on.

6 A -- Brow Trail Road --

7 Q Hold on.

8 A -- to spend the money on.

9 Q Well, that's -- but my question is -- I'm trying  
10 to understand your position. So as -- hold on. As it  
11 relates to Brow Trail Road, what, within the agenda  
12 topic of Brow Trail Road, were you discussing? Because  
13 it -- it sounds like you're just referencing that,  
14 going back to Pulltight Road and repairs or changes to  
15 that road.

16 A I was referencing the county budget, the use of  
17 their funding, which was the general fund of Marion  
18 County. They'd openly talked about spending close to  
19 \$2 million on Brow Trail Road while trying to reference  
20 American Rescue Plan funds and the use of that. And  
21 they're openly talking about how they would have to  
22 change the name of Big Fork Road to Brow -- or to  
23 change, change the name of Brow Trail to Big Fork Road  
24 to comply with the federal funding, and they'd have to  
25 adopt it and possibly take on eminent domain to make it

1 like a polo shirt.

2 Q Yeah. Was he dressed in -- only thing that's  
3 coming to mind is civilian clothing. I think that's --

4 A Yeah. I think he was in plain clothes at the  
5 time.

6 Q Plain clothes. Thank you.

7 Okay. Dale Winters was there as well?

8 A He was.

9 Q Was he -- was he in plain clothes?

10 A He was.

11 Q Do you know if he was on-the-job while he was at  
12 the meeting?

13 A I'm not positive. I don't believe he was,  
14 because he was in plain clothes.

15 Q Okay. Did you know him before this?

16 A No.

17 Q So when he stood up and you -- you saw him at  
18 some point I'm assuming.

19 A I only saw him after Bo grabbed my shirt and  
20 told -- everybody started telling me to come outside,  
21 and I told him I'll only leave under threat of arrest.  
22 And Bo started backing off, and Dale -- that's when  
23 Linda Mason said, "Deputy Winters", and Dale started  
24 pulling me out.

25 Q So you told Sheriff Burnett that you would only

1 Community Health.

2 MR. FLORES: Okay.

3 BY MR. HICKEY:

4 Q It's all right. We'll figure it out later.

5 Like I say, if it pops in your mind, just  
6 interrupt and just say hey, by the way, this is who  
7 this is.

8 I believe in your complaint you have alleged  
9 that Sheriff Burnett made physical contact with you.

10 A He did.

11 Q And what, what type of contact are we talking  
12 about?

13 A He grabbed me on my shirt collar trying to  
14 redirect me outside the -- to leave.

15 Q So he grabbed your shirt collar?

16 A Yeah.

17 Q Around your neck?

18 A Not around my neck, but like I guess my lapel  
19 area.

20 Q Trying to remember what -- this is the January  
21 '24 meeting, right?

22 A Yes.

23 Q No one touched you in the June 2024 meeting?

24 A No.

25 Q So the Sheriff grabbed your lapel area to

1 Community Health.

2 MR. FLORES: Okay.

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19 area.

20 Q Trying to remember what -- this is the January  
21 '24 meeting, right?

22 A Yes.

23 Q No one touched you in the June 2024 meeting?

24 A No.

25 Q So the Sheriff grabbed your lapel area to

1 redirect you?

2 A Yeah. Saying "it's time to go".

3 Q Did he cause any physical injury?

4 A No.

5 Q Was it a light touching?

6 A I mean -- yeah.

7 Q And you said that was to just redirect you to  
8 exit the room?

9 A Yes.

10 Q Were you walking a different way than towards  
11 the exit?

12 A I was standing at the podium.

13 Q So the touching would have been as you were  
14 standing at the podium before you began walking?

15 A Yeah.

16 Q How long did it last?

17 A A few seconds.

18 Q Less than five?

19 A Yes.

20 Q Is there some form of excessiveness to that  
21 complaint?

22 A He shouldn't have put his hands on me, period.

23 Q Is there some form of excessiveness though as to  
24 how he did it? Or is that even a claim that you're  
25 making.

1 MR. HICKEY: Thank you, Robin.

2 BY MR. HICKEY:

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4 A I was speaking to the fact that they were trying  
5 to use \$2 million on --

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23 for a road that has no homes on it, that they do not  
24 own, but yet they could not take care of the roads that  
25 they have.



1 Q So the only -- the only thing about Brown --  
2 Brow Trail Road is the fact that money's being spent  
3 there, but not spent at Pulltight Road.

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22 change the name of Big Fork Road to Brow -- or to  
23 change, change the name of Brow Trail to Big Fork Road  
24 to comply with the federal funding, and they'd have to  
25 adopt it and possibly take on eminent domain to make it

1 a full road all the way through, and how it was for  
2 public safety and how there was only three ways off  
3 that mountain during the entire meeting.

4 But yet when I tried to anchor to that in my  
5 speech about Donald Leonard, how we have one way off  
6 our mountain, we have a dangerous railroad crossing.  
7 You told me the county road budget's \$10,000, but yet  
8 now you're trying to spend \$2 million on this  
9 development over here where you'd have to take on the  
10 road.

11 Q So you weren't -- you were not substantively  
12 discussing Brow Trail Road. The only connection that  
13 it had to your presentation was the amount of money  
14 that had been brought up. But what your real point  
15 was, my road, Pulltight Road, is what needs addressing.

16 MR. FLORES: Object to the form.

17 MR. HICKEY: Correct?

18 MR. FLORES: Object to the form, but you  
19 can answer.

20 THE WITNESS: I was objecting it -- to  
21 it because they were being dismissive and avoidant of  
22 the crime and the legal problems that we had. They had  
23 blown it off and dismissed -- or minimized my issue  
24 prior saying we only have \$10,000, but now they have  
25 \$2 million to go spend on a public develop -- or

1 private developer.

2 BY MR. HICKEY:

3 Q Well, I understand. I got that. I guess what  
4 I'm saying is, substantively as it relates to the  
5 agenda item relating to Brow Trail Road, what is it  
6 that you were discussing in the public comment section?  
7 Excuse me. The public comment portion of the  
8 commission meeting.

9 A Is that the highest and best use of our funds  
10 seeing they can't afford to take care of the roads that  
11 they have.

12 Q Not just the roads that they have. You were  
13 directing it back to Pulltight Road because you're also  
14 referencing that you were talking in relation to agenda  
15 item 17, Don Leonard, which was Pulltight Road.

16 A Correct. So I was addressing two things that  
17 were on the agenda.

18 Q Well, actually, the agenda matter by Don Leonard  
19 related to drugs and gunshots at Pulltight Road.

20 A The agenda items that are listed on there is  
21 just Pulltight Road.

22 Q Yeah, I understand. But the minutes capture  
23 what was discussed in the meeting.

24 A Those minutes are --

25 MR. FLORES: Object to the form. Go

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21 just Pulltight Road.

22 Q Yeah, I understand. But the minutes capture  
23 what was discussed in the meeting.

24 A Those minutes are --

25 MR. FLORES: Object to the form. Go

1 the police." And I said "for what? What crime have I  
2 committed?"

3 Q Okay. And what did she say in response?

4 A She said something of -- basically I'm making --  
5 it was something to like try to put me down and that I  
6 was making an ass out of myself, and that I needed to  
7 make a point. And I said you're making my point for  
8 me.

9 Oh, no. She told me she was elected -- she's  
10 elected for her opinions. And I said, no, ma'am.  
11 You're elected to serve your constituents.

12 Q So the, the exchange during the June '24 meeting  
13 was during the public comments section of the meeting.

14 A Yes.

15 Q Okay. Anything else that took place in, in the  
16 June '24 meeting beyond what you've explained?

17 A No.

18 Q And did you, did you say what it was that you  
19 wanted to say in addressing the commission --

20 A I did.

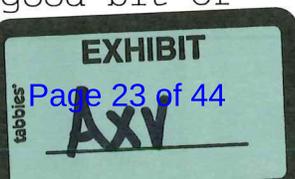
21 Q -- during the public comment section?

22 A I did.

23 Q How long do you think that exchange lasted?

24 A Five minutes, maybe.

25 Q Because you were up there a pretty good bit of



1 time then.

2 A It was three to five minutes. I forget the  
3 length of the video. But they weren't -- it was one of  
4 those times they weren't timing public comments. They  
5 were letting people do what they wanted.

6 Q Including you.

7 A Yes.

8 Q Did, did Linda Mason say why she was calling the  
9 police?

10 A No.

11 Q Do you remember anyone in attendance at that  
12 meeting -- and anyone other than -- you, you mentioned  
13 Ronnie Kennedy. And I suppose anyone other than who's  
14 identified on the agenda.

15 A I believe that John Christof was there. There's  
16 a number of citizens.

17 Q Yeah, I understand. Folks in the audience.

18 A Yeah.

19 Q I'm just, just trying to -- if you remember  
20 anybody's name, that's fine. If you --

21 A None in particular.

22 Q If you don't, that's fine as well.

23 Okay. How do you know John Christof?

24 A County meetings.

25 Q Just from county meetings?



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22 Q If you don't, that's fine as well.

23 Okay. How do you know John Christof?

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25 Q Just from county meetings?



1           So the issues that you're having, as I  
2 understand, the mental/emotional, it's based on your  
3 experience in totality in Marion County.

4           A     Yeah.

5           Q     Can you quantify in any way that's reliable how  
6 much of these -- the issues that you're having relate  
7 only to the January and June 2024 meetings that are the  
8 subject matter of this case?

9           A     I can't quantify it to just those partic --  
10 specific two meetings, because I think it's a sum total  
11 of all things --

12          Q     Okay. All right.

13          A     -- and their repeated abuses.

14          Q     That's fair.

15                And for the counseling that you receive, it  
16 looked like you see somebody different -- not every  
17 time, but you have different counselors at different  
18 times.

19          A     I had changed counselors. I wasn't happy with  
20 one of them at first, and then I know one of them I  
21 believe quit or was not with the platform anymore.

22          Q     So who is, who is the counselor that you are not  
23 happy with?

24          A     I believe it was the first one Bishar, Bearss  
25 (phonetic spelling.)



1 understanding -- you tell me if I'm wrong, please.  
2 What I'm understanding is, it doesn't seem important  
3 enough to them as compared to the person making the  
4 presentation.

5 A Correct.

6 Q And then minimizing the presentation, what do  
7 you mean by that?

8 A For example, Donald Leonard was talking about  
9 people shooting in the direction of his house across  
10 two major roads and how it broke the laws. And they  
11 were -- oh, it's not that big of a deal. We'll get --  
12 we'll have the Sheriff down there. He'll solve that  
13 problem for you. Instead of actually making a fixed  
14 plan or solution and addressing this is a criminal act  
15 and then going after the problem.

16 Q Okay. So the complaint in that respect would be  
17 that they don't -- they don't address it as much as  
18 perhaps you believe or maybe the presenter believes it  
19 should be addressed.

20 A Correct.

21 Q Okay. Anything else as it relates to the county  
22 limiting citizen's presentation at meetings or speech  
23 at meetings?

24 A That's it.

25 Q Okay. In paragraph -- excuse me. In

1 bust.

2 MR. HICKEY: Okay. Hold on. Just  
3 finish the --

4 MR. FLORES: Yeah. Just finish the --

5 MR. HICKEY: -- the agenda topic for  
6 '24. Do you remember?

7 THE WITNESS: They're -- the way they  
8 were acting, the unconstitutionality.

9 MR. HICKEY: You told me. You told me.  
10 I think you've already told me that.

11 Okay. All right. Yeah. We'll take a  
12 break. Sorry, Robin.

13 (Brief recess.)

14 BY MR. HICKEY:

15 Q Okay. Mr. Morgan, I'm going to go back on the  
16 record. And it may not feel like it, but we're --  
17 we've made quite a bit of progress, so hopefully I'll  
18 get you out of here before long, so just -- we'll just  
19 keep, keep plugging on.

20 I want to jump forward to the June '24 meeting.  
21 And tell me what, what it was during that meeting that  
22 you -- or that happened that, that you believed you  
23 were done wrong.

24 A I was addressing the county commission in a  
25 public comments section after hearing multiple citizens

1 the police." And I said "for what? What crime have I  
2 committed?"

3 Q Okay. And what did she say in response?

4 A She said something of -- basically I'm making --  
5 it was something to like try to put me down and that I  
6 was making an ass out of myself, and that I needed to  
7 make a point. And I said you're making my point for  
8 me.

9 Oh, no. She told me she was elected -- she's  
10 elected for her opinions. And I said, no, ma'am.  
11 You're elected to serve your constituents.

12 Q So the, the exchange during the June '24 meeting  
13 was during the public comments section of the meeting.

14 A Yes.

15 Q Okay. Anything else that took place in, in the  
16 June '24 meeting beyond what you've explained?

17 A No.

18 Q And did you, did you say what it was that you  
19 wanted to say in addressing the commission --

20 A I did.

21 Q -- during the public comment section?

22 A I did.

23 Q How long do you think that exchange lasted?

24 A Five minutes, maybe.

25 Q Because you were up there a pretty good bit of

1 just -- kind of the same dismissive, avoidant behavior  
2 that I experienced. I believe there was one group of  
3 five people that were trying to get a bridge at their  
4 street fixed that were denied. It was another guy,  
5 Ronnie Kennedy asking about we're getting waterlines.

6 Q Ronnie Kennedy?

7 A Yes.

8 Q Okay. Thank you.

9 A Talking about how he'd been fighting to get  
10 waterlines for 30 years. And I addressed the counsel  
11 saying I find it -- basically I find it upsetting that  
12 every time a county -- a water -- a senior citizen asks  
13 for help such as public infrastructure, waterways, it's  
14 dismissed, but yet they seem to have no problem doing  
15 whatever they want for a developer. And I was told by  
16 Linda Mason that I'm just bitching.

17 Q Is that a quote?

18 A Yeah.

19 Q "Bitching" is the word?

20 A Yes.

21 Q Okay.

22 A And then I was -- she's like I -- while I was  
23 addressing it, she was staring at her phone. I'm like  
24 "and you don't even have the decency to look at us  
25 while we're addressing you." And she said "I'm calling

1 the police." And I said "for what? What crime have I  
2 committed?"

3 Q Okay. And what did she say in response?

4 A She said something of -- basically I'm making --  
5 it was something to like try to put me down and that I  
6 was making an ass out of myself, and that I needed to  
7 make a point. And I said you're making my point for  
8 me.

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10 elected for her opinions. And I said, no, ma'am.  
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16 June '24 meeting beyond what you've explained?

17 A No.

18 Q And did you, did you say what it was that you  
19 wanted to say in addressing the commission --

20 A I did.

21 Q -- during the public comment section?

22 A I did.

23 Q How long do you think that exchange lasted?

24 A Five minutes, maybe.

25 Q Because you were up there a pretty good bit of

1           So the issues that you're having, as I  
2 understand, the mental/emotional, it's based on your  
3 experience in totality in Marion County.

4           A     Yeah.

5           Q     Can you quantify in any way that's reliable how  
6 much of these -- the issues that you're having relate  
7 only to the January and June 2024 meetings that are the  
8 subject matter of this case?

9           A     I can't quantify it to just those partic --  
10 specific two meetings, because I think it's a sum total  
11 of all things --

12          Q     Okay. All right.

13          A     -- and their repeated abuses.

14          Q     That's fair.

15                 And for the counseling that you receive, it  
16 looked like you see somebody different -- not every  
17 time, but you have different counselors at different  
18 times.

19          A     I had changed counselors. I wasn't happy with  
20 one of them at first, and then I know one of them I  
21 believe quit or was not with the platform anymore.

22          Q     So who is, who is the counselor that you are not  
23 happy with?

24          A     I believe it was the first one Bishar, Bearss  
25 (phonetic spelling.)



1 A Yeah.

2 Q Okay. As it relates to this case, is there --  
3 do you have to take any -- and the treatment that you  
4 have at BetterHelp, do you take any medications?

5 A No.

6 Q I'm sorry?

7 A No, I'm not.

8 Q Okay. Do you take any medications for anything  
9 having to do with any, any issue that occurred in  
10 January of '24 or June of '24 that are made the subject  
11 of your lawsuit?

12 A No.

13 Q Do you have any, any type of physical  
14 limitations; meaning you're not capable of doing a  
15 certain task or engage in a certain activity that you  
16 could prior to those meetings?

17 A No.

18 Q Are you -- you're able to conduct your business  
19 the way you did before? Meaning you can lease -- not  
20 lease. But sign, sign contracts or buy properties like  
21 you did before?

22 A Yes.

23 Q And you're not hindered in any way from making a  
24 living as a result of what took place at either the  
25 June or the January '24 meetings.



1 because I've got one marked up somewhere.

2 MR. FLORES: Okay.

3 BY MR. HICKEY:

4 Q So the move to become a full time resident of  
5 Marion County then was at least after the first  
6 commission meeting that's referred to in your complaint  
7 that was in January of 2024.

8 A I believe so, yes.

9 Q Is the Pulltight Road property the only property  
10 that you have owned in Marion County?

11 A I have two parcels of land in Marion County.

12 Q Where is the other?

13 A It's right next door. It doesn't have a 911  
14 address yet.

15 Q Is it on Pulltight Road?

16 A Technically it's off -- yes. Old Whiteside Road  
17 is the parcel number, but Pulltight Road is the access  
18 to it.

19 Q Okay. Did you get, get the two tracts of  
20 property at the same time?

21 A I did.

22 Q Okay. So that's on, you said, Old Whiteside  
23 Road?

24 A Uh-huh.

25 Q Yes?



1 on the record. Just a little bit more.

2 MR. FLORES: Oh, okay.

3 BY MR. HICKEY:

4 Q Mr. Morgan, I think we've touched on it, but I'm  
5 not finding -- we couldn't piece it together.

6 Am I correct that between January 2024 and  
7 June 2024 you did not request to address the commission  
8 either on an agenda matter or in public comments  
9 section?

10 A I did. I was on the agenda for February 2024.

11 Q And you presented on that date?

12 A I was limited to three minutes.

13 Q Limited to three minutes.

14 Okay. And since, since June of '24, have you  
15 presented again, either on an agenda matter or public  
16 comment?

17 A I have.

18 Q How many times?

19 A Two or three.

20 Q And were you limited during those presentations  
21 in any way?

22 A I have.

23 Q And was it a time limitation?

24 A There was a time limitation put in the February  
25 meeting where I'd been requested to be put on the

1 agenda. I was told I would have to be in the public  
2 comments, even though I'd emailed them and requested to  
3 be within the time period.

4 Q You're still talking about February '24?

5 A No. That was recently. That was -- I want to  
6 say June 2025.

7 Q Okay.

8 A Mayor Jackson tried to limit me from speaking on  
9 the drug task force vote. The...

10 Q So that's February '24. And then since June,  
11 you've spoken two to three times and with a time  
12 limitation. In June '25 and a limitation on drug task  
13 force issues?

14 A Yes.

15 Q All right. Any other limitations on your  
16 presentations besides that?

17 A Not that I'm aware of.

18 Q What were the other two to three times following  
19 June of '24?

20 A It would have just been on public safety and --  
21 or public infrastructure or the way they're spending  
22 funds, such as like Brow Trail.

23 Q And you were allowed to present during those?

24 A Yeah. I was -- and those were public comments.  
25 So, yes.

1 A Yeah.

2 Q Okay. As it relates to this case, is there --  
3 do you have to take any -- and the treatment that you  
4 have at BetterHelp, do you take any medications?

5 A No.

6 Q I'm sorry?

7 A No, I'm not.

8 Q Okay. Do you take any medications for anything  
9 having to do with any, any issue that occurred in  
10 January of '24 or June of '24 that are made the subject  
11 of your lawsuit?

12 A No.

13 Q Do you have any, any type of physical  
14 limitations; meaning you're not capable of doing a  
15 certain task or engage in a certain activity that you  
16 could prior to those meetings?

17 A No.

18 Q Are you -- you're able to conduct your business  
19 the way you did before? Meaning you can lease -- not  
20 lease. But sign, sign contracts or buy properties like  
21 you did before?

22 A Yes.

23 Q And you're not hindered in any way from making a  
24 living as a result of what took place at either the  
25 June or the January '24 meetings.



1 A No.

2 Q And are you having any type of mental or  
3 emotional issues from either of those meetings in and  
4 of themselves?

5 A I definitely fear for my life from the police in  
6 Marion County. I don't go and conduct business in  
7 Marion County, and avoid it at all costs at this point  
8 in my life.

9 Q What has happened, if anything, that causes you  
10 to fear for your life from the police in Marion County?

11 A Because I've seen how they act retaliatory and  
12 unconstitutionally.

13 Q And, and what, what do you have in mind?

14 First, let's break it down. Maybe break it down  
15 a little bit easier. What is it that you have in mind  
16 or that you've experienced or know about where the  
17 sheriff's office acted in retaliation?

18 A I've seen from my videos to other issues of  
19 other -- there's a pastor from the jail that was  
20 seeking opioid assistance money who got into a bunch of  
21 legal trouble post fact who claimed it was very  
22 retaliatory. I'm not positive on the details. But  
23 from speaking with him, I felt it was retaliatory.

24 Q Who is -- who is that?

25 A I forget his name. He was actually speaking at

1 A Yeah.

2 Q Okay. As it relates to this case, is there --  
3 do you have to take any -- and the treatment that you  
4 have at BetterHelp, do you take any medications?

5 A No.

6 Q I'm sorry?

7 A No, I'm not.

8 Q Okay. Do you take any medications for anything  
9 having to do with any, any issue that occurred in  
10 January of '24 or June of '24 that are made the subject  
11 of your lawsuit?

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14 limitations; meaning you're not capable of doing a  
15 certain task or engage in a certain activity that you  
16 could prior to those meetings?

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18 Q Are you -- you're able to conduct your business  
19 the way you did before? Meaning you can lease -- not  
20 lease. But sign, sign contracts or buy properties like  
21 you did before?

22 A Yes.

23 Q And you're not hindered in any way from making a  
24 living as a result of what took place at either the  
25 June or the January '24 meetings.

1 Q Was Linda Mason the chairperson for all, all of  
2 the meetings at which you have presented?

3 A No. She's been removed after -- I believe it  
4 was the June meeting -- June 2024 meeting.

5 Q Well, she wasn't removed, was she?

6 A Or not removed, but resigned and replaced with  
7 Morrison.

8 Removed was not a good word for that.

9 MR. HICKEY: All right. This is our  
10 next exhibit.

11 (Exhibit 7 was marked for identification.)

12 MR. HICKEY: I don't have an extra copy.

13 MR. FLORES: Yeah.

14 MR. HICKEY: I just didn't make it. I  
15 printed it.

16 MR. FLORES: Oh, that's fine.

17 We got -- have we got this?

18 MR. HICKEY: No. I just found it and  
19 printed it. I printed that off yesterday. That's  
20 his --

21 THE WITNESS: Yeah, it kind of looks  
22 like it.

23 MR. HICKEY: I think that's his.

24 THE WITNESS: Yes.

25 MR. FLORES: Whose?



1 THE WITNESS: My website.

2 MR. HICKEY: Mr. Morgan's.

3 MR. FLORES: Oh, oh.

4 Can you supplement you-all's responses  
5 or -- well, we're going to get it.

6 MR. HICKEY: I'll make you a copy.

7 MR. FLORES: Okay. All right.

8 BY MR. HICKEY:

9 Q I'm not going to go over anything in terrible  
10 detail.

11 I just wanted to ask you, the MarionCountyTN.com  
12 website --

13 A Yeah.

14 Q -- is yours.

15 A It is.

16 Q And do you maintain and keep it updated and  
17 active?

18 A I do update some.

19 Q Okay. Have you updated it since June of '24?

20 A I don't think I even purchased it until June of  
21 this year.

22 Q Okay. When you would have updated it then after  
23 June of '24.

24 A Yeah.

25 Q And I don't know. I mean, you, you do -- you

1 put on here that -- somewhere that it's a parody.

2 A Yeah. It's in the bottom of the fine print on  
3 the first page.

4 Q My question is, the, the products section, do  
5 you really have those products, or is that just --

6 A It's all printed on demand and drop shipped.

7 Q So if somebody wanted to buy the Hail King David  
8 with a picture of a donkey t-shirt, you could do that?

9 A Go ahead and order it. I have friends that have  
10 ordered it. It will be printed on demand and shipped  
11 right to your house. I have nothing to do with it at  
12 that point.

13 MR. FLORES: Sales pitch.

14 BY MR. HICKEY:

15 Q And then the next to last page of this exhibit  
16 is, "So Why Do I Call Them Out as I Do." And it  
17 references the November 2022 commission meeting.

18 Is that something that you typed up yourself?

19 A Yeah.

20 Q Who's that a picture of?

21 A That is an IA edited image of Bo Burnett.

22 Q Okay. So what we're looking at -- it's not --  
23 the pages aren't numbered. It's towards the back. But  
24 it's an elderly gentleman in a blue coat with a -- I  
25 don't know what color tie that is. Greenish color tie

1 and light blue shirt. That's intended to be Sheriff  
2 Burnett, but it's not him.

3 A It is not. It's, it's supposed to be a parody  
4 of him.

5 Q Okay. And then you have, I believe, a picture  
6 of Mayor Jackson with a face of a donkey.

7 A Yes.

8 Q Okay. But you're not referring to him as a  
9 donkey, are you?

10 A No. I refer to him as a jackass.

11 Q Okay. Do you -- do you pay to keep this  
12 website? Do you pay a one time -- I don't know how it  
13 works. You tell me.

14 A I paid \$12 for the domain, and I pay \$120 a year  
15 for hosting.

16 Q Okay. Does anybody else have any input into  
17 this parody website?

18 A Other citizens when they bring things to my  
19 attention and journalistic activities.

20 Q I'm sorry. Does anyone else edit or add to the  
21 website content besides you? Not provide information,  
22 but I mean actually type something in or add a picture.

23 A ChatGPT.

24 Q Who?

25 A ChatGPT.

1 Q Chad?

2 A ChatGPT.

3 Q ChatGPT. Who is that?

4 A Some AI.

5 Q Oh. All right. And when we've been talking  
6 about this, you, you kind of laughed and smiled a  
7 little bit.

8 A Yeah.

9 Q You think this is funny?

10 A I do think it's funny.

11 Q Okay. And this all came up you said June of --

12 A I believe --

13 Q -- this year?

14 A -- June of this year.

15 Q This year?

16 A I was paying my property taxes or looking up  
17 some agenda or something and realized the County  
18 website was "dot net", so I said hmm, who owns the "dot  
19 com"?

20 Q Okay. Did -- did you help or prepare any  
21 documents for Mr. Christof as it relates to his ongoing  
22 legal issues with the city?

23 A I sat and helped John create a timeline and  
24 clear up what he was trying to say.

25 Q Did you draft any mo -- anything styled as a