



Deposition of:
Michelle Wolven

November 18, 2016

In the Matter of:
Doe vs. McBrayer

Tiffany Alley, A Veritext Company

1075 Peachtree St. NE , Suite 3625

Atlanta, GA, 30309

800.808.4958 | calendar-ga@veritext.com | 770.343.9696

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 SUPERIOR COURT IN AND FOR
COBB COUNTY, GEORGIA

CIVIL ACTION NUMBER

14-1-1246-51

JANE DOE, JOAN DOE, JEAN DOE

and JILL DOE,

Plaintiff(s),

vs.

Danielle E. MCBRAYER, M.D., et al.,

Defendant(s).

VOLUME I

DEPOSITION TESTIMONY OF:

MICHELLE WOLVEN

November 18, 2016

9:15 a.m.

Law Office of Martin E. Valbuena

113 Village Walk, Suite B

Dallas, Georgia

COURT REPORTER:

David Miller, LCR, CCR, RPR, RMR

Page 2	Page 4
1 INDEX	1 APPEARANCES
2	2
3 EXAMINATION BY: PAGE NO.	3
4 Ms. Tribble 7, 131	4 FOR THE PLAINTIFF(S):
5 Mr. Nasrallah 127	5 Matthew G. Nasrallah
6 Disclosure 162	6 ROBERTSON, BODOH & NASRALLAH, LLP
7 Certificate 164	7 990 Cobb Parkway North
8	8 Suite 205-A
9 INDEX OF EXHIBITS	9 Marietta, Georgia 30062
10 EXHIBITS PAGE NO.	10
11 DEF EXHIBIT 1 Depo notice 24	11 C. Lawrence Meyer
12 DEF EXHIBIT 2 Email communication 26	12 MEYER & BARDILL, LLC
13 DEF EXHIBIT 3 Huiel email communication 27	13 1827 Powers Ferry Road
14 DEF EXHIBIT 4 Manilla folder 28	14 Suite 301, Building 6
15 DEF EXHIBIT 5 Manilla folder 28	15 Atlanta, Georgia 30339
16 DEF EXHIBIT 6 Manilla folder 29	16
17 DEF EXHIBIT 7 Manilla folder 29	17
18 DEF EXHIBIT 8 Manilla folder 29	18 FOR THE DEFENDANT(S):
19 DEF EXHIBIT 9 Manila folder 30	19 Taylor Tribble
20 DEF EXHIBIT 10 Manila folder 30	20 HUFF POWELL BAILEY
21 DEF EXHIBIT 11 Alpha documents 30	21 999 Peachtree Street, NE
22 DEF EXHIBIT 12 Meeting with Comm. Woods 31	22 Suite 950
23 DEF EXHIBIT 13 Email communication 34	23 Atlanta, Georgia 30309
24 DEF EXHIBIT 14 B&W photographs 34	24
25 DEF EXHIBIT 15 Arkansas communications 35	25
Page 3	Page 5
1 INDEX OF EXHIBITS	1 APPEARANCES
2 EXHIBIT PAGE NO.	2
3 DEF EXHIBIT 16 Phone records 35	3
4 DEF EXHIBIT 17 Photograph 40	4 FOR THE WITNESS:
5 DEF EXHIBIT 18 Photograph 40	5 Martin E. Valbuena
6 DEF EXHIBIT 19 Photograph 40	6 MARTIN ENRIQUE VALBUENA, P.C.
7 DEF EXHIBIT 20 Email communications 43	7 113 Village Walk
8 DEF EXHIBIT 21 Georgia Medical Board 43	8 Suite B
9 DEF EXHIBIT 22 Medical records 91	9 Dallas, Georgia 30132
10 DEF EXHIBIT 23 Email correspondence 99	10
11 DEF EXHIBIT 24 Handwritten notes 150	11
12	12
13	13
14	14
15	15
16	16
17	17
18	18
19	19
20	20
21	21
22	22 (Reporter disclosure made pursuant to
23	23 Article 8.b of the Rules and Regulations of the
24	24 Board of Court Reporting of the Judicial Council of
25	25 Georgia)

<p style="text-align: right;">Page 6</p> <p>1 I, David L. Miller, a Certified Court 2 Reporter, acting as Commissioner, certify that on 3 this date, pursuant to the Georgia Rules of Civil 4 Procedure, there came before me at the Law Office 5 of Martin E. Valbuena, 113 Village Walk, Suite B, 6 Dallas, Georgia, commencing at approximately 7 9:15 a.m. on November 18, 2016, MICHELLE WOLVEN, 8 witness in the above cause, for oral examination, 9 whereupon the following proceedings were had: 10 11 MS. TRIBBLE: This will be the 12 deposition of Michele Wolven taken pursuant to 13 subpoena and notice and agreement of counsel for 14 all purposes allowed under the Georgia Civil 15 Practice Act. 16 Ms. Wolven, I don't know if you have 17 spoken with your lawyer; but you are allowed, as a 18 witness, to read and sign your deposition to make 19 sure there are no grammatical errors or things like 20 that. Is that something that you would like to do? 21 THE WITNESS: Yes. 22 MR. VALBUENA: Yes. 23 MS. TRIBBLE: If you will just 24 agree, Ms. Wolven, that when you read your 25 deposition you will remain under oath like you will</p>	<p style="text-align: right;">Page 8</p> <p>1 1 type nods of the head or shakes of the head. I 2 2 will remind you if you forget, okay? 3 3 A. Yes. 4 4 Q. I'm not trying to be rude, but it 5 5 can get conversational and people forget. 6 6 We can take breaks as often as you 7 7 want or need. I don't think we are going to be 8 8 here too long, but a couple of hours. 9 9 I sort of forget how long we have 10 10 been going when I'm talking. So just remind me if 11 11 you want to get up and take a comfort break or 12 12 anything. I just ask that you respond to any 13 13 question that's on the table, okay? 14 14 A. Okay. I will probably have to use 15 15 the bathroom. 16 16 Q. Okay. Just to confirm, Ms. Wolven, 17 17 that you are not taking any medications today that 18 18 would impair your ability to be truthful and give 19 19 answers to my questions? 20 20 A. No. 21 21 Q. All right. Have you done anything 22 22 to prepare for your deposition other than gather 23 23 the materials that you have put in a stack here 24 24 today -- and meeting with your lawyer? 25 25 Have you read anything else?</p>
<p style="text-align: right;">Page 7</p> <p>1 1 be today, then you don't have to go through the 2 2 process of having it notarized. Is that agreeable? 3 3 THE WITNESS: Yes. 4 4 MS. TRIBBLE: If you will swear in 5 5 the witness, please. 6 6 7 7 MICHELLE WOLVEN, 8 8 having been first duly sworn, was examined and 9 9 testified as follows: 10 10 11 11 EXAMINATION BY MS. TRIBBLE: 12 12 Q. Ms. Wolven, have you ever given a 13 13 deposition before? 14 14 A. No. 15 15 Q. All right. I'm sure you have talked 16 16 with your lawyer about the process, but just to 17 17 give you a few directions. 18 18 If you will make sure that you wait 19 19 for me to finish my question before you answer so 20 20 David can get everything down, okay? 21 21 A. Yes. 22 22 Q. Make sure you give verbal responses 23 23 so, again, he can type everything down. He can't 24 24 25 25</p>	<p style="text-align: right;">Page 9</p> <p>1 Have you spoken to anyone else? 2 A. No. 3 Q. Have you discussed the substance of 4 your testimony in preparation for today with anyone 5 other than your attorney or your husband? 6 A. No. 7 Q. Have you spoken with Mr. Meyer or 8 Mr. Nasrallah about the substance of your 9 deposition testimony? 10 A. Possibly a year ago. I'm -- not 11 exactly what I'm going to say or be asked, but we 12 just discussed that I was going to be subpoenaed. 13 Q. Back when we originally scheduled 14 your deposition? 15 A. Yes. 16 Q. Okay. I will talk about that, but 17 anything in getting ready for your deposition 18 today. Have you spoken with anyone about the 19 substance, other than your lawyer? 20 A. No. 21 Q. Have you ever read any of the 22 filings in the case? 23 A. Yes. 24 Q. How did you gain copies of those 25 filings?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. I went online and searched the 2 Superior Court records of Cobb County, Georgia. 3 Q. And then just read them on line or 4 printed them out? 5 A. Yeah. I just read them online. 6 Q. And that's something -- did you have 7 to pay to be able to read those? 8 A. No. 9 Q. Tell me what you have looked at, if 10 you can remember. 11 A. I looked at the original filing. 12 Q. The complaint? 13 A. Yeah. The original complaint. I 14 looked at copies of motions -- like different 15 motions. I think there was a rule -- order -- some 16 orders that the judge made on documents or pages 17 about who is going to be subpoenaed, objections. I 18 pretty much read probably most of the documents 19 online. 20 Q. Have you read copies of any of the 21 other depositions that have been taken in this 22 case? 23 A. They weren't online; so, no. 24 Q. Have you been provided those by 25 anyone else?</p>	<p style="text-align: right;">Page 12</p> <p>1 me your full name, please. 2 A. Michele Marie Wolven. 3 Q. Marie? 4 A. Yes. 5 Q. That's my middle name too. 6 Have you ever been -- 7 MR. VALBUENA: That's the middle 8 name of a lot of women. 9 Q. (BY MS. TRIBBLE) Have you ever been 10 known by any other name? 11 A. My maiden name, Michelle Ballwanz. 12 Q. How do you spell that? 13 A. B-A-L-L-W-A-N-Z. 14 Q. When were you born, Ms. Wolven? 15 A. December the 2nd, 1966. 16 Q. You have a birthday coming up. 17 A. Yes. 18 Q. Where were you born? 19 A. Lansing, Michigan. 20 Q. What is your current address? 21 A. 206 Starry Night Way, three words. 22 S-T-A-R-R-Y, Night Way, Dallas, 30132. 23 Q. That's Paulding County? 24 A. Yes. 25 Q. Who do you live with at that</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Nobody gave me any of those. 2 Q. Is it fair to say that the extent of 3 the litigation documents from this case that you 4 have read have been from the Superior Court web 5 site? 6 A. Yes. 7 Q. All right. Have you kept any sort 8 of personal diary -- either in written form or 9 online form -- about your deposition or this case, 10 other than what you might have commented -- and we 11 will talk about that -- on various blogs and things 12 like that? 13 A. Yeah. I have a little notebook that 14 I just took notes on. 15 Q. You brought that with you today? 16 A. Yes. 17 Q. You made that, obviously, just on 18 your own accord, not on the advice of any lawyer? 19 A. Exactly. 20 Q. Okay. I'm going to ask you a few 21 background questions, and then we will talk about 22 what documents you have brought and then how you 23 found the trash in this case, okay? 24 A. Yeah. 25 Q. Just to give you a road map. Tell</p>	<p style="text-align: right;">Page 13</p> <p>1 address? 2 A. My husband, my father, and my -- 3 five of my children. 4 Q. And what is your husband's name? 5 A. Michael. Michael T. Wolven. 6 Q. What is your father's name? 7 A. Howard Ballwanz. B-A-L-L-W-A-N-Z. 8 Q. The five children that live with 9 you, are they all under the age of 18? 10 A. Yes. 11 Q. And then you have four other 12 children? 13 A. Yes, four other children. 14 Q. All adults? 15 A. Yes. 16 Q. Can you tell me if any of them live 17 in Cobb County. 18 A. None. 19 Q. What are the -- 20 A. Oh, yes. My son just moved out. 21 Andrew is 23. He just moved to Cobb County. 22 Q. Andrew Wolven? 23 A. Yes. 24 Q. And what are the other names of your 25 adult children?</p>

Page 14	1 A. My oldest is Timothy. 2 Q. How old is he? 3 A. He is -- he will be 27. He is 26. 4 And then there is Kaitlin, and she 5 is 24, 25. 6 Q. What is her last name? 7 A. Thomas. 8 Q. Okay. And then I told you Andrew. 9 And then Ashleigh, A-S-H-L-E-I-G-H. 10 She is in Savannah? 11 Q. Wolven? 12 A. Yes. 13 Q. How old is she? 14 A. Almost 21. Twenty. 15 Q. How old is Andrew? 16 A. Andrew is twenty -- '94. So he is 17 23. 18 Q. And Andrew lives in Cobb County? 19 A. Yes. He just moved there on 20 Tuesday. 21 Q. Is he married? 22 A. He will be married in December. 23 Q. What is his wife's name? 24 A. His fiance's name is Mary. It's 25 Mary A-N-G-E, Ange.	Page 16	1 Q. When did you move to Georgia? 2 A. In 1990. 3 Q. From where? 4 A. From New Jersey. 5 Q. Is your husband from the northeast 6 too? 7 A. Yeah -- well, yes. We both moved -- 8 we got married in New Jersey. 9 Q. Your other kids -- what schools do 10 they attend? 11 A. Okay. So Andrew is currently at 12 North Metro Tech. 13 Q. Andrew -- the older -- the 14 23-year-old? 15 A. Yes. 16 And Ashley is Armstrong University. 17 And then Micah is -- Micah and Briana are in high 18 school. They are at the North Paulding High School 19 campus. 20 Q. Okay. 21 A. Then Mary and Dominick are at 22 McClure Middle School. And Eli, the baby, is at -- 23 MR. VALBUENA: Burnt Hickory. 24 THE WITNESS: No, he is not at Burnt 25 Hickory. He used to be at Burnt Hickory. He is at
Page 15	1 Q. Okay. Do you have any other 2 relatives who live in Cobb County? 3 A. No. 4 Q. How long -- 5 A. Except for inlaws. Like my son's 6 inlaws. 7 Q. What are their last names? 8 A. Altimari. Kathy and -- what is 9 Kathy's husband's name? 10 MR. VALBUENA: Chuck. 11 A. Charles Altimari. 12 Q. How long have you and Michael and 13 your other family members lived at the Starry Night 14 Way address? 15 A. Since September of 2014. 16 Q. Where did you live before that? 17 A. 71 States Avenue, Dallas, 30132. 18 Q. How long did you live at that 19 address? 20 A. Since 1999. 21 Q. Did y'all move to Georgia in '99? 22 A. No. Prior to that we were in Cobb 23 County, and we were on Verdant Woods Court. I 24 forget the address. Verdant Woods Court, Powder 25 Springs.	Page 17	1 -- goodness. I can't even remember the name now. 2 I just passed it. 3 MR. VALBUENA: Where is it? 4 THE WITNESS: It's the school right 5 on Ivy Bullage. 6 MR. VALBUENA: P. B. Rich? 7 THE WITNESS: No. 8 MR. VALBUENA: Abney. 9 THE WITNESS: Abney. Too many 10 schools. 11 Q. (BY MS. TRIBBLE) That's a handful. 12 Where does -- so Andrew is in school 13 at North Metro Tech? 14 A. Yes. 15 Q. Does Kaitlin work? 16 A. She is a full-time mother. She has 17 got two toddlers -- babies. She sometimes watches 18 some neighbor's children. 19 Q. What is her husband's name? 20 A. David Thomas. 21 Q. Where does he work? 22 A. He works for an exterminating 23 company, and I think it's called All Pro or -- 24 Q. Allgood? 25 A. No. It's a new company. It's,

Page 18

1 actually, a company that my oldest son's friends
2 started. And so I can't remember the name of it.
3 I'm just trying to think of what the truck says.
4 Q. That's okay. If you think about it,
5 you can just let me know.
6 A. Okay.
7 Q. You said they have two young kids?
8 A. Yes.
9 Q. Then what about Timothy; is he
10 married?
11 A. Yes.
12 Q. What is his wife's name?
13 A. Katie. Katherine.
14 Q. And do they have any children?
15 A. They have two.
16 Q. So four grandkids?
17 A. Yes.
18 Q. And what does Timothy do?
19 A. Timothy is a mortgage broker. He
20 runs a mortgage office.
21 Q. Do you know what the company is
22 called?
23 A. I don't know for sure, but I think
24 it's like American Mortgage. I don't know. One of
25 those big companies, I believe.

Page 19

1 Q. Does Katie work outside the home?
2 A. No.
3 Q. What is Ashley majoring in at
4 Armstrong?
5 A. It's marine biology.
6 Q. Oh, cool.
7 Does she want to stay in Savannah?
8 A. She really likes Savannah, but she
9 misses home too.
10 Q. Then what about Andrew; does he work
11 or just go to school full-time?
12 A. Yeah. Andrew is working part-time
13 as a paramedic -- EMT paramedic.
14 Q. Do you know --
15 A. He doesn't -- he doesn't have his
16 paramedic degree yet. So he is like an advanced
17 EMT.
18 Q. Is that what he is going to school
19 for?
20 A. He is getting his paramedic license.
21 Q. Do you know what company he is
22 working for?
23 A. No.
24 Q. Is this job in Cobb?
25 A. He works out -- I think it's in

Page 20

1 Woodstock, so Cherokee County.
2 Q. Are you a member of any church or
3 civic organization in the Marietta or Georgia --
4 A. Yes.
5 Q. Tell me about them.
6 A. The church I attend is right here in
7 Dallas. It's St. Vincent De Paul Catholic Church.
8 Q. And what about any civic or
9 community organizations? We are going to talk
10 about your anti-abortion, pro-life organizations
11 later.
12 A. What do you mean?
13 Q. I mean, if you are -- I don't know
14 like Kiwanis Club or anything like that?
15 A. No.
16 Q. Any charities?
17 A. Not really. I mean --
18 Q. You are like on the board of --
19 A. No. I'm not on the board of
20 anything.
21 Q. Do you volunteer for any charity on
22 a regular basis?
23 A. No. I'm unable to.
24 Q. Tell me just about your education.
25 Where did you go to high school?

Page 21

1 A. I went -- graduated high school in
2 Lakewood, New Jersey, at Lakewood High School.
3 Q. What year?
4 A. '83 or '84.
5 Q. Okay. I know I'm throwing you off
6 with all of these detailed questions. Don't worry
7 about it.
8 And what did you do after high
9 school?
10 A. I went to Rutgers -- well, I went to
11 Ocean County College; and then I went to Rutgers
12 University in New Brunswick.
13 Q. Did you graduate from Rutgers?
14 A. No. We moved.
15 Q. Have you received an associate
16 degree or bachelor's degree?
17 A. No.
18 Q. Have you received any other formal
19 education since leaving Rutgers?
20 A. No.
21 Q. Do any of your relatives have any
22 legal training? Paralegals, attorney, work at law
23 offices?
24 A. No.
25 Q. What about any family members who

Page 22

1 have medical training besides your son who is an
2 EMT?
3 A. No.
4 Q. Are you currently employed, Ms.
5 Wolven?
6 A. No.
7 Q. Have you ever been involved in a
8 lawsuit as a plaintiff or a defendant?
9 A. Yes.
10 Q. Tell me about that.
11 A. It was when I was probably 19, I
12 think. And there was a accident at the amusement
13 park that I worked at, Six Flags New Jersey. And a
14 piece of metal went through my leg, and we sued Six
15 Flags.
16 Q. Was it settled?
17 A. Yeah. I think they paid out a claim
18 of like a thousand dollars, something like that.
19 Q. Anything else besides that?
20 Where you were actually a party to a
21 lawsuit?
22 A. No.
23 Q. Have you -- I know I'm going back.
24 I apologize. You said you are not currently
25 working.

Page 23

1 Have you worked outside the home in
2 the last 10 years?
3 A. No.
4 Q. When is the last time that you
5 worked outside the home, if ever?
6 A. Where I had an actual paid job
7 probably would have been in New Jersey.
8 Q. What were you doing there?
9 A. I did -- I did -- I worked at the
10 amusement park when I was in high school, I worked
11 at a supermarket, I worked at a pizza place, a
12 newspaper company -- that's about it.
13 Q. What does your husband do?
14 A. He is -- well, he does -- it's hard
15 for me to say because I'm not quite sure how to
16 tell you. He used to do actuarial work, but he
17 just changed his job a year ago. He does account
18 management, benefits planning -- I don't know
19 really what the title is that he does.
20 Q. What is the name of the company that
21 he works for?
22 A. It's called Aon Hewitt.
23 Q. Does he own that company?
24 A. No.
25 Q. Okay. You passed the background.

Page 24

1 A. Okay.
2 Q. Don't worry. I have people
3 sometimes who I ask them when they got married and
4 their spouse is also sitting in the room and their
5 face goes blank and -- so.
6 I'm going to mark as Defendant's
7 Exhibit 1 this -- this is the amended notice --
8 amended subpoena and notice to take your
9 deposition.
10 (WHEREUPON, a document was marked as
11 Defendant's Exhibit 1 and is attached to the
12 original transcript.)
13 Q. This just has a copy of the --
14 MS. TRIBBLE: Do you want a copy of
15 this?
16 MR. NASRALLAH: A depo copy? No.
17 Q. (BY MR. TRIBBLE) I know you have
18 seen that subpoena. Is that true?
19 A. Yes.
20 Q. We talked before your deposition
21 that you have brought quite a lot of information in
22 response, and I appreciate that.
23 So I kind of want to go through this
24 exhibit and find out what you have brought in
25 response to my different questions, all right?

Page 25

1 A. Okay.
2 Q. The first one is any and all
3 correspondence between you and Mr. Nasrallah or any
4 person from his law firm. Do you have anything in
5 response to that that you have brought?
6 A. Yes. It's an email stack.
7 Q. Where is the email? I haven't
8 changed the order of anything that you have
9 brought.
10 A. It's not in any particular order.
11 Q. Okay.
12 A. It's all sort of random.
13 Q. I kind of want to mark these and
14 name what they are, so -- sorry.
15 A. Okay.
16 MR. VALBUENA: Do you want her to
17 hand them to you and tell you which -- which
18 category they would go through while we go through
19 them?
20 MS. TRIBBLE: Let's go off the
21 record and do that.
22
23 (Off-the-record discussion)
24
25 Q. (BY MS. TRIBBLE) Go back on the

<p style="text-align: right;">Page 26</p> <p>1 record. 2 So I'm going to mark that, and I 3 will give it back to you. 4 I'm going to mark a -- we went off 5 the record and Ms. Wolven went through the 6 documents she brought me and organized them. 7 In response to number one, any and 8 all correspondence between Ms. Wolven and Mr. 9 Nasrallah, Ms. Wolven has provided a stack of email 10 correspondence that I'm going to mark jointly as 11 Defendant's Exhibit Number 2. 12 (WHEREUPON, a document was marked as 13 Defendant's Exhibit 2 and is attached to the 14 original transcript.) 15 Q. I don't know if it's in any sort of 16 chronological order. 17 A. No. 18 Q. My second question was any and all 19 correspondence -- in Exhibit A of Defendant's 20 Exhibit 1 any and all correspondence between you 21 and Mr. Meyer. 22 Do you have any correspondence 23 between you and Mr. Meyer, who is sitting at the 24 end of the table? 25 A. No.</p>	<p style="text-align: right;">Page 28</p> <p>1 copies of whatever you want out of there. She 2 wants to keep those copies. 3 MS. TRIBBLE: That's fine. We will 4 figure that out. I am going to mark the totality 5 of it, and we will make a copy of the first page 6 and then everything that is inside. 7 MR. VALBUENA: Make a copy of the 8 front of the folder, you mean? 9 MS. TRIBBLE: Yeah. 10 Q. (BY MS. TRIBBLE) So I'm going to 11 mark the documents from "McBrayer's dumpster July, 12 2012. Not given to FBI, not ripped. No patient 13 info. Some crinkled into a ball." 14 That's just your handwriting on the 15 top? 16 MR. NASRALLAH: A great identifier. 17 (WHEREUPON, a document was marked as 18 Defendant's Exhibit 4 and a copy is attached to the 19 original transcript.) 20 Q. As Defendant's Exhibit 5 I'm going 21 to mark the folder that says, "McBrayer's 22 documents, cash total receipts July of 2012." 23 (WHEREUPON, a document was marked as 24 Defendant's Exhibit 5 and a copy is attached to the 25 original transcript.)</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. All right. Number three, any and 2 all correspondence between you and any of the four 3 plaintiffs or any person acting or -- conducting to 4 be acting on behalf of the plaintiff. 5 You have brought with you today 6 emails between you and -- we will make sure this is 7 right sided in a second -- between you and the 8 plaintiffs in this case. I will mark that stack as 9 Defendant's Exhibit 3. 10 (WHEREUPON, a document was marked as 11 Defendant's Exhibit 3 and is attached to the 12 original transcript.) 13 Q. Number four, any and all 14 documentation, including, but not limited to, 15 patient records, billing records, employee records, 16 employee contact information that you have in your 17 possession from Alpha OB/GYN Group. 18 So what you have brought with you 19 that would be responsive to that -- I guess I will 20 call these manilla folders with documents that you 21 found in the trash at his office? 22 A. Yes. 23 Q. Okay. I'm just going to mark the 24 outside of the folder. 25 MR. VALBUENA: We are going to make</p>	<p style="text-align: right;">Page 29</p> <p>1 1 Q. Six is the folder that says on the 2 2 front, "More documents obtained from five bags of 3 3 trash Governor's Ridge, July 2012." 4 4 (WHEREUPON, a document was marked as 5 5 Defendant's Exhibit 6 and a copy is attached to the 6 6 original transcript.) 7 7 Q. Seven is a folder "McBrayer employee 8 8 contact info." That's from the trash as well? 9 9 A. Yes. 10 10 (WHEREUPON, a document was marked as 11 11 Defendant's Exhibit 7 and a copy is attached to the 12 12 original transcript.) 13 13 Q. That's from 2012, you think? 14 14 A. Yes. 15 15 Q. All right. 16 16 (WHEREUPON, a document was marked as 17 17 Defendant's Exhibit 8 and a copy is attached to the 18 18 original transcript.) 19 19 Q. Eight is, "Patient's records found 20 20 July, 2012, not given to FBI." That's another 21 21 folder. 22 22 (WHEREUPON, a document was marked as 23 23 Defendant's Exhibit 9 and a copy is attached to the 24 24 25 25</p>

<p style="text-align: right;">Page 30</p> <p>1 1 original transcript.) 2 2 Q. Number 9 is a folder, "Documents 3 3 found at McBrayer's dumpster, 2012, ripped up, not 4 4 given to FBI." 5 5 And 10, "patient intake forms 2010, 6 6 McBrayer's community dumpster, made complaint to 7 7 Medical Board." 8 8 (WHEREUPON, a document was marked as 9 9 Defendant's Exhibit 10 and a copy is attached to 10 10 the original transcript.) 11 11 Q. Did I read all of that right? 12 12 A. Yes. And then there was that packet 13 13 -- that patient packet. 14 14 Q. I'm going to mark as Defendant's 15 15 Exhibit 11 -- 16 16 (WHEREUPON, a document was marked as 17 17 Defendant's Exhibit 11 and a copy is attached to 18 18 the original transcript.) 19 19 Q. -- a packet that you have identified 20 20 with information given to the Cobb County Police 21 21 Department in 1999. 22 22 It includes information about what 23 23 you have said is a late term abortion, directions 24 24 regarding that from Dr. McBrayer's office. A flier 25 25 that you provided to patients outside of Governor's</p>	<p style="text-align: right;">Page 32</p> <p>1 when -- 2 A. Yeah. 3 Q. -- the time frame of this? 4 A. The pictures were -- that trash that 5 is in that packet was found in February, I believe. 6 Q. Of 2012? 7 A. Maybe January of 2012. I think 8 mostly February of 2012. 9 Q. And then it looks like you have on 10 here, "Meeting with Commissioner Woods, March the 11 13th, 2012?" 12 A. It's Commissioner Cook. And a 13 friend of mine made a mistake when she was helping 14 me do the presentation and called him Commissioner 15 Wood. 16 Q. Regardless, this packet was 17 something that you provided to the Department of 18 Community Health when you made a complaint about 19 Dr. McBrayer's office? 20 A. Yes. 21 Q. Okay. 22 A. Well, can I back that up? 23 Q. Sure. 24 A. It wasn't a complaint. I was having 25 a meeting with him on the advice of Attorney</p>
<p style="text-align: right;">Page 31</p> <p>1 Ridge regarding abortion. 2 A. Yes. 3 Q. And then blank patient registration 4 forms from Dr. McBrayer's office? 5 A. Yes. 6 Q. What about the first two pages? 7 This is handwriting from someone at 8 Dr. McBrayer's office? 9 A. Yeah. Those are handwritten notes 10 that were given to the person who gave that to me. 11 The cost, I believe, of how much the abortion was. 12 Q. As Defendant's Exhibit 12 I'm going 13 to mark a packet of documents that you have 14 identified when we were on a break of information 15 that you gave to the Department of Community 16 Health. 17 (WHEREUPON, a document was marked as 18 Defendant's Exhibit 12 and a copy is attached to 19 the original transcript.) 20 A. Yes. 21 Q. It includes pictures that you took 22 of items that you found in trash bags outside of 23 Governor's Ridge? 24 A. Yes. 25 Q. All right. When was -- do you know</p>	<p style="text-align: right;">Page 33</p> <p>1 General Sam Olens to meet with the Commissioner to 2 discuss the possibility of him writing a position 3 statement to Attorney General Sam Olens so that 4 they could make a motion on laws in Georgia that 5 pertained to abortions and abortion facilities and 6 surgery centers. 7 Q. Do you know if that ever happened? 8 A. No, it did not. 9 Q. Do you know why? 10 A. Commissioner Cook decided that he 11 didn't want anything to do with it. That's all I 12 know. He just didn't do anything. 13 Q. All right. So going back to Exhibit 14 A from Defendant's Exhibit Number 1. 15 Number five, Ms. Wolven, any and all 16 documentation related to any patient from Alpha 17 OB/GYN Group that you have in your possession. And 18 you have provided me what we have already marked as 19 some patient information from the trash. You have 20 provided me with email correspondence between you 21 and the plaintiffs in this case. 22 And then I'm going to mark as 23 Defendant's Exhibit Number 13 two pages of emails 24 between you and other patients from Dr. McBrayer's 25 practice who aren't patients in this case.</p>

<p style="text-align: right;">Page 34</p> <p>1 (WHEREUPON, a document was marked as 2 Defendant's Exhibit 13 and is attached to the 3 original transcript.) 4 A. Okay. 5 Q. I'm going to mark as Defendant's 6 Exhibit Number 14 other photographs -- black and 7 white photographs that you have taken from items 8 found in Dr. McBrayer's trash outside Governor's 9 Ridge? 10 A. Yes. 11 (WHEREUPON, a document was marked as 12 Defendant's Exhibit 14 and is attached to the 13 original transcript.) 14 Q. Number six from Exhibit A of 15 Defendant's Exhibit 1 is any and all documentation 16 related to any patient that you have in your 17 possession from other medical practice or 18 healthcare institutions. 19 And you brought with you some 20 information from other patients from another 21 practice in Arkansas? 22 A. Yes. 23 Q. And what practice is that? 24 Do you know what the name of the 25 group is?</p>	<p style="text-align: right;">Page 36</p> <p>1 I can actually give you. They are in an email 2 format which I sent a copy of to my lawyer. 3 Q. Okay. So you have maintained -- you 4 have recorded phone calls from these four women? 5 A. No. I have a recorded phone call -- 6 wait. Who is this from? 7 MR. VALBUENA: Number eight. 8 A. Okay. So one of them is a recorded 9 phone call that one of the plaintiffs made to the 10 office of Dr. McBrayer, and she spoke to Angela 11 Buckner. And it's a record phone call between 12 Angela Buckner and the patient, Rachell Graham. 13 Q. Okay. And then Ms. Graham emailed 14 that to you? 15 A. I was on the phone with her. It was 16 a conference call. 17 Q. And so what you are saying is Ms. 18 Graham recorded a call where you were on a 19 conference with Ms. Graham and Angela Buckner? 20 A. I recorded it. 21 Q. Okay. And you have a copy of that 22 in an email format? 23 A. Yeah. Well, it's -- it's -- the 24 audio file is in an email. 25 Q. I'm pretty sure we can probably save</p>
<p style="text-align: right;">Page 35</p> <p>1 A. Little Rock Family Planning. 2 Q. Okay. I'm going to mark that. 3 (WHEREUPON, a document was marked as 4 Defendant's Exhibit 15 and is attached to the 5 original transcript.) 6 Q. It's a set of emails. 7 A. Yeah. It was to the healthcare 8 director in charge of licensing of abortion 9 facilities or surgery centers in the state of 10 Arkansas. 11 Q. I have marked that -- 12 A. And it concerned a specific patient 13 who was injured that. 14 Q. I have to marked that as Defendant's 15 Exhibit 15. 16 A copy of cell phone records from 17 January 2012 to the present. You have brought 18 that. I will mark that as Defendant's Exhibit 16. 19 (WHEREUPON, a document was marked as 20 Defendant's Exhibit 16 and is attached to the 21 original transcript.) 22 Q. Number eight, any recordings of 23 conversations between you and any of the four 24 plaintiffs in this case. 25 A. The recordings aren't something that</p>	<p style="text-align: right;">Page 37</p> <p>1 that to a CD. 2 A. Okay. 3 Q. We will talk about that. But I 4 would like to get a copy of that. 5 A. Okay. 6 Q. Do you have any other recordings of 7 phone calls or conversations between you and any of 8 the four plaintiffs? I can list their names. 9 A. No, I don't. 10 Q. All right. What about recordings 11 between -- either phone or personal -- in person 12 conversations between you and any employee or prior 13 employee? 14 A. Yes. Angela Buckner. 15 Q. Is that the same one that we just 16 talked about? 17 A. That's a separate one. That was her 18 calling me and threatening me. She actually texted 19 me, and I called her back on the phone number that 20 she texted me on. 21 Q. And you have that recording that you 22 sent via email to your attorney? 23 A. Yeah. It likes an hour or two. 24 Q. Any other recorded phone calls 25 between you and any employee or prior employee of</p>

<p style="text-align: right;">Page 38</p> <p>1 Dr. McBrayer's office? 2 A. No. 3 Q. Number 10 is copies of all signs or 4 pamphlets that you have generated as part of your 5 protest of and/or in opposition to Dr. McBrayer, 6 Alpha OB/GYN. 7 We have already marked as part of 8 the Cobb County PD correspondence a pamphlet from 9 the '90s. Do you have copies of any other 10 pamphlets that you have passed out since then? 11 A. No, because I didn't go there after 12 1999. 13 Q. Didn't go -- 14 A. The police told me not to go there. 15 Q. You didn't go to Alpha OB/GYN since 16 1999? 17 A. Not to protest or talk to any 18 patients. 19 Q. What about any billboards? 20 I think I have on your Facebook page 21 you have had billboards before. 22 A. Those weren't mine. Those were 23 billboards that people that I know were doing. 24 They were doing prayer vigils and counseling -- 25 sidewalk counseling at the facility.</p>	<p style="text-align: right;">Page 40</p> <p>1 MS. TRIBBLE: I will do it 2 separately, since I put on it the back. 3 Q. (BY MS. TRIBBLE) So 17, 18, and 19 4 are, I think, pictures of the outside of the 5 building? 6 A. Yes. 7 (WHEREUPON, documents were marked as 8 Defendant's Exhibits 17, 18 and 19 and are attached 9 to the original transcript.) 10 Q. You did not take these? 11 A. I did not take them. 12 Q. Do you know when these were taken? 13 A. It was probably '98 or '99. 14 Q. Who provided you these photographs? 15 A. Ms. Underwood from the Cobb County 16 Crisis Pregnancy Center across the street from 17 Governor's Ridge. 18 Q. Number 12 is any and all photographs 19 you possess of any employee or prior employee of 20 Alpha OB/GYN Group, PC, including Dr. McBrayer. 21 Have you brought everything that 22 might be -- 23 A. I don't have -- I don't possess 24 them. There are pictures of Dr. McBrayer that I 25 guess were put on the web site, the blog.</p>
<p style="text-align: right;">Page 39</p> <p>1 So I had posted those, but I don't 2 have those. They would have been on the Internet. 3 Q. You said you posted those on one of 4 your Facebook pages? 5 A. Yes. 6 Q. They are not yours? 7 A. Probably on a blog. I haven't been 8 on that blog in a long time, so I haven't really 9 checked it. I think there are pictures on there 10 that they were given to me from other people. And 11 I just uploaded them through email. 12 Q. The only flier that you have that 13 you have made was from the '90s that we have marked 14 as part of the Cobb County PD records? 15 A. Right. Correct. 16 Q. Number 11 is any and all photographs 17 that you possess of Alpha OB/GYN Group PC, 18 including the outside, inside of the office, or any 19 area surrounding the office. 20 We have marked already as part of 21 other exhibits copies of the trash that you found. 22 I'm going to mark as Exhibit 17 -- 23 MR. NASRALLAH: And 18 and 19, all 24 three. Are you going to try to composite? That 25 would be hard to do.</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. And the Facebook page? 2 A. Yes. 3 Q. Were those put on by you taken by 4 someone else? 5 A. They were taken by other people. I 6 would have to look at it. 7 Q. The photographs taken by other 8 people that are a part of the Facebook page that 9 you are the administrator of -- you would have 10 posted those pictures? 11 A. Yes. 12 Q. But you don't actually have copies 13 of the pictures? 14 A. I don't have copies of them because 15 they were on my cell phone. There may be some on 16 my current cell phone from 2014 when he was at 17 another facility. 18 Q. The Alpha Gynecology and Consulting? 19 A. No. It was -- yeah. Ms. Sheila 20 Bynum's clinic. 21 Q. Those pictures that you might have 22 on your cell phone might depict Sheila Bynum, Dr. 23 McBrayer -- from that clinic? 24 A. From that clinic. Not at his other 25 facility.</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. All right. What about any -- number 2 13, any and all videos that you have of Alpha 3 OB/GYN Group? 4 A. I had a video of the dumpster area 5 and the employees throwing the trash away from 6 February of 2012. But it was from a cell phone 7 that I had, you know, four years ago. And if I 8 have it, it would be on a memory card; and I 9 couldn't find it. 10 Q. Okay. If you do find that, if you 11 will just let your attorney know so he can tell 12 Mr. Nasrallah and me. 13 A. Okay. 14 Q. The same on number 14, videos that 15 you would have of employees or prior employees of 16 Alpha OB/GYN. That would be that same video you 17 just mentioned? 18 A. Yes. 19 Q. All right. So I -- let me finish 20 marking this stuff. 21 You had a set of email 22 correspondence that you have had over the years 23 with employee or prior employees of Dr. McBrayer. 24 I'm going to mark that as Exhibit 20. 25 (WHEREUPON, a document was marked as</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. (BY MS. TRIBBLE) Go back on the 2 record. 3 So what I have done is just printed 4 this calendar from 2012 to help us -- I'm going to 5 start asking you about when you found the trash at 6 issue in this case. That might help you orient 7 yourself to the timing of when things happened. 8 A. Okay. Thank you. 9 Q. So according to the complaint that 10 was filed on behalf of the four plaintiffs by the 11 two attorneys in this room, you found the trash on 12 August the 18th, 2012. And I want to know what you 13 remember; but, first, is that accurate? 14 A. It's around that time frame. But 15 when I looked at my records, it looks like it was 16 more towards the very end of July. Probably the 17 last Saturday in July, which would have been July 18 31st. 19 Q. And tell me what you found in your 20 records that made you think it was July 31st, or 21 around that time. 22 A. I might have to look at my notes. 23 Q. The note -- 24 A. I don't know if it was because there 25 was an internal memo in there in -- an office</p>
<p style="text-align: right;">Page 43</p> <p>1 Defendant's Exhibit 20 and is attached to the 2 original transcript.) 3 Q. And then you brought, I think, at 4 the request of -- you told me Mr. Nasrallah -- 5 information from the -- that you received from the 6 Georgia Composite Medical Board about a complaint 7 that you made regarding Dr. McBrayer back in 2010? 8 A. Yes. 9 Q. And the correspondence is from 10 January of 2011? 11 A. Yes. 12 Q. I will mark that as Defendant's 13 Exhibit 21. 14 (WHEREUPON, a document was marked as 15 Defendant's Exhibit 21 and is attached to the 16 original transcript.) 17 THE WITNESS: Can I run to the 18 lady's room? 19 MS. TRIBBLE: We can take a break. 20 Yeah. 21 22 10:01 AM 23 (Short recess) 24 10:05 AM 25</p>	<p style="text-align: right;">Page 45</p> <p>1 memo -- I'm really confused, because I think there 2 was an office memo from August something. 3 So I don't know why I said July 4 31st. But something when I was reviewing some 5 emails or maybe looking at some of the trash -- 6 something made me say it was the last Saturday in 7 July. 8 Q. And the notes that you have that you 9 said -- like personal handwritten notes -- would 10 that help refresh your memory about when things 11 happened? 12 A. Yeah, it's possible. 13 Q. Do you want to look at those? 14 A. Yeah. 15 Q. I will probably want to get a copy 16 of those too. 17 A. Okay. It is just total chicken 18 scratch -- scribble. 19 Q. That's okay. 20 A. It's in one of my son's notebooks. 21 It's just what I could find to take 22 notes on when he was thumbing through emails. 23 Q. So you are saying you took those 24 notes recently? 25 A. Yes.</p>

<p style="text-align: right;">Page 46</p> <p>1 Q. Okay.</p> <p>2 A. Okay. I think it would be more like</p> <p>3 the middle of August because of an email that I</p> <p>4 found I sent information to Rodney Sanders of the</p> <p>5 Cobb County Fire Department. He is with the arson</p> <p>6 unit.</p> <p>7 And he told me on August the 12th,</p> <p>8 2012, that he was giving all of the information</p> <p>9 that I was giving him to the FBI.</p> <p>10 Q. Why were you emailing Mr. Sanders?</p> <p>11 A. Mr. Sanders was the fire</p> <p>12 investigator for Cobb County. And he was the</p> <p>13 original -- I suppose he was the original fire</p> <p>14 investigator. And then FBI came in and, I guess,</p> <p>15 pretty much took the case from him.</p> <p>16 Q. You are talking about when the fire</p> <p>17 broke out in Dr. McBrayer's office?</p> <p>18 A. Yes.</p> <p>19 Q. Why would you have emailed him on</p> <p>20 August the 12th about records that you found in the</p> <p>21 trash?</p> <p>22 A. This may be a long answer. But the</p> <p>23 reason why I met with Commissioner Cook was to</p> <p>24 discuss things that we found in Dr. McBrayer's</p> <p>25 dumpster including Medicaid fraud, throwing away</p>	<p style="text-align: right;">Page 48</p> <p>1 good chance that he was still throwing away records</p> <p>2 that might indicate he was still doing illegal</p> <p>3 second trimester abortions -- which are a felony in</p> <p>4 our state to do them in an unlicensed facility. So</p> <p>5 we decided to go to the trash.</p> <p>6 After that meeting I received a</p> <p>7 letter in the mail from his office -- Commissioner</p> <p>8 Cook's office saying they weren't going to do</p> <p>9 anything, but they would take all of the evidence</p> <p>10 that I had given them in the presentation and all</p> <p>11 of the supplemental pictures -- they would give</p> <p>12 that to the Georgia Medical Board.</p> <p>13 Several weeks later the fire broke</p> <p>14 out. The evidence that we had was criminal, and he</p> <p>15 could have gone to jail and should have gone to</p> <p>16 jail.</p> <p>17 So when the fire broke out, and I</p> <p>18 still hadn't gotten even a call from the Medical</p> <p>19 Board, I thought right away that since it started</p> <p>20 where the records were that he obviously had set</p> <p>21 the fire.</p> <p>22 So the FBI put out a tip line. And</p> <p>23 I called them. And it was weeks and weeks and</p> <p>24 weeks -- probably three weeks before they called me</p> <p>25 back and even had anything -- any sort of care to</p>
<p style="text-align: right;">Page 47</p> <p>1 drugs -- full vials of drugs, throwing away</p> <p>2 biohazardous waste, throwing away patient records.</p> <p>3 And there was one other topic. There was one other</p> <p>4 thing.</p> <p>5 MR. VALBUENA: Employee information.</p> <p>6 A. The employee information.</p> <p>7 And so I had a meeting with</p> <p>8 Commissioner Cook. I gave him a packet of</p> <p>9 information, which you have, along with</p> <p>10 supplemental pictures of patient records which I do</p> <p>11 not have with me because they were in possession of</p> <p>12 another person who went to the dumpster with me.</p> <p>13 And she had all of the drug vials and everything.</p> <p>14 I didn't want those in my house.</p> <p>15 But that -- there was a supplement</p> <p>16 packet that was given to Commissioner Cook. And</p> <p>17 that was in the middle of March of 2012.</p> <p>18 And so the whole reason why we went</p> <p>19 to the dumpster the first time was because we were</p> <p>20 having this meeting with Commissioner Cook. And we</p> <p>21 knew in the past that Dr. McBrayer had thrown</p> <p>22 records away over since -- starting, that we knew</p> <p>23 of, since 2007.</p> <p>24 And so we decided that since we were</p> <p>25 preparing for this presentation that there was a</p>	<p style="text-align: right;">Page 49</p> <p>1 even talk to me.</p> <p>2 And it started to become obvious</p> <p>3 that they didn't care about the facts. And I was</p> <p>4 getting more information that Dr. McBrayer was</p> <p>5 still throwing documents away, not shredding</p> <p>6 patient information.</p> <p>7 And so I called -- I called and left</p> <p>8 messages for the Fire Chief, the guy who was</p> <p>9 investigating it along with the FBI. And I wanted</p> <p>10 to let him know that he may not be getting all of</p> <p>11 the information from the FBI. And that I believed</p> <p>12 that it was Dr. McBrayer that set the fire because</p> <p>13 of the criminal allegations. And he was being</p> <p>14 investigated now at that point -- by July he was</p> <p>15 actually finally being investigated by the Medical</p> <p>16 Board.</p> <p>17 So I was trying to make sure that</p> <p>18 the information was getting to the proper person,</p> <p>19 because it turned out that Agent Andy Von Epps, who</p> <p>20 was taking my information, was actually giving that</p> <p>21 information to Dr. McBrayer's staff.</p> <p>22 Q. How do you know that?</p> <p>23 A. Because of correspondence that I had</p> <p>24 with employees who told me.</p> <p>25 Q. Is that something that you brought</p>

Page 50

1 with you today?
2 A. No. I -- those were telephone
3 calls. They -- I don't know if it is in the email.
4 I don't think I have an email about it.
5 But what happened was -- probably in
6 November of 2012, after the Medical Board had
7 already had the case open for six months, I got a
8 phone call from Mr. Bill Haggerty who was on the
9 sidewalk in front of Governor's Ridge saying,
10 "Michele, I just got -- I just had a very odd
11 meeting with an employee at Dr. McBrayer's office,
12 and I really need you to call her. She is scared."
13 Q. Bill Haggerty; is that what you
14 said?
15 A. Yes.
16 Q. Who is that?
17 A. He is a member of St. Catherine's
18 Catholic Church. I think he is the head Knight of
19 Columbus there.
20 Q. Is that someone who is a pro-life
21 activist?
22 A. Yes. He was on the sidewalk
23 praying. He called me saying, "You need to talk to
24 this woman, her name is Brittney. She is scared.
25 She's got four children. And she has to work there

Page 51

1 because she is trying to get her med tech license
2 and they made her work there for free. And this is
3 where they are getting all of their employees. So
4 can you call her."
5 So she called me. I think I called
6 her and then she called me back. Ten o'clock on a
7 Friday night she wanted me to meet her at a Burger
8 King telling me that she didn't want to talk to me
9 on the phone.
10 And I told my husband what was going
11 on. And he already knew a lot of the stuff that
12 was going on with the FBI. The FBI had already
13 taken my records illegally and didn't give me any
14 documentation of any of the patient records that
15 they took.
16 And my husband said, "No, it's not a
17 good idea for you to go and meet somebody who you
18 don't know who it is. You could be being set up."
19 So I tried to keep her on the phone
20 as long as I could to find out information that she
21 wanted to give me. And she said that she had four
22 small children, she was a single mother. Her name
23 was Brittney Joiner.
24 And I believe she said that Dr.
25 McBrayer had just issued her a full-time job with

Page 52

1 him at \$10 an hour. But I'm not sure if she was
2 being paid by him at the time because she was doing
3 an internship.
4 Brittney said that she heard Angela
5 Buckner on the phone telling patients that I broke
6 into their office and stole medical records from
7 them.
8 And so over the course of -- I don't
9 know if it was several days or a week -- Brittney
10 ended up calling Agent Andy Von Epps of the FBI to
11 tell him some of the information. I may have told
12 him, too; but somehow Angela Buckner found out
13 because she called -- Brittney had quit somehow in
14 that time period. And --
15 Q. Talking about November of 2012?
16 A. Yes. And Brittney called me and she
17 said she wanted to go back to work for him. That
18 they had called and offered to hire her back at ten
19 or eleven dollars an hour, and she could start
20 Monday morning at six AM, but she needed to be
21 there early to sign a piece of paper.
22 I said, "Brittney, you can't do
23 that. This is dangerous." I believe -- I already
24 had been threatened by Angela Buckner on the phone.
25 and she told me she knew where all of my children

Page 53

1 went to school and their names and I had better
2 watch out. And that her and Dr. McBrayer had
3 friends in very high places, and I would regret it
4 if I didn't stop. So I told Brittney that this was
5 not something that she wanted to be involved with
6 and not to do it.
7 I assumed that I had convinced her
8 not to do it, but she thought she was going to go
9 inside and take pictures of some of Dr. McBrayer's
10 medical equipment which had stains of blood, the
11 beds were taped together with duct tape, and there
12 was blood in there. And she thought she would take
13 some of those photographs.
14 Q. For you?
15 A. For the Medical Board, because she
16 knew the Medical Board was investigating him.
17 What happened was she was asked to
18 leave the facility when she was working the day
19 that Bill Haggerty met her because she -- the
20 clinic -- somehow Dr. McBrayer's office found out
21 that the Medical Board was coming -- which -- what
22 I understand is not -- that is not normal.
23 Q. Are you saying coming to his office?
24 A. To investigate him that morning.
25 Q. Okay.

Page 54

1 A. And so they told everybody in the
2 office -- which was probably most of the
3 employees -- that they had to leave because they
4 didn't have any sort of licenses. No degrees, no
5 certificates, and so -- that he needed everybody
6 gone.
7 So with every -- she had been
8 starting to work there right after the fire. She
9 didn't work there during the fire, but she knew of
10 the fire.
11 Everything she was hearing in the
12 office and she -- and being told she needed to
13 leave, there was a Medical Board investigation, she
14 got very nervous. And that's why she went to
15 Mr. Haggerty on the sidewalk because of all of the
16 stuff she was hearing.
17 Okay. So fast forward. It turned
18 out that Brittney decides she is going to go back
19 to work for Dr. McBrayer and shows up at his office
20 sometime around 5:30 AM. It's still dark out,
21 obviously. It was in, I believe, mid-November on a
22 Monday. Maybe it might have been November the
23 15th -- it might have been the 8th.
24 And Angela greeted her and gave her
25 a piece of paper and said, "Brittney, you have to

Page 55

1 sign this piece of paper if you want to come back
2 to work." And she said, "Well, I can't even read
3 it. What is it?" She said, "Don't worry about it,
4 just sign it and you can come back to work."
5 Brittney said, "I'm not going to
6 sign anything until I read it." So I guess they
7 stepped into the office. She read it.
8 And it was a statement that they had
9 typed up saying that Brittney had recanted her
10 statement to the FBI -- that she had lied to the
11 FBI. And she wouldn't sign it, so Angela told her
12 to leave.
13 And at that point she started
14 calling me on the phone extremely disturbed because
15 now she knew that the FBI had given Ms. Buckner and
16 Dr. McBrayer information about an investigation
17 that was currently open and is still open till this
18 day.
19 And so she got scared. And I didn't
20 answer my -- somehow -- I don't know if my phone
21 was lost, but she was calling me. And I got the
22 message that she also had called Agent Andy Von
23 Epps to ask him what was going on; how did they
24 have this information that she had told him. I
25 believe she actually had a meeting with Agent Andy

Page 56

1 Von Epps in person prior to this day.
2 Q. Talking Angela?
3 A. Brittney. I believe Brittney had
4 actually met Agent Andy Von Epps in person at a
5 McDonald's on 92 to explain to him all of the
6 things that she had seen in the clinic and heard,
7 which also led her to believe that he set the fire.
8 Q. Led Brittney to believe that Dr.
9 McBrayer set the fire before she started working
10 there?
11 A. Yes.
12 Q. Okay.
13 A. So when I finally called her back --
14 which was probably 11:30 or 12:00 that morning --
15 she told me that she had been trying to get in
16 touch with me and Agent Andy Von Epps.
17 When I heard what happened, I was
18 extremely angry. And so I called him. I said,
19 "This is ridiculous, I'm going to call him right
20 now." And I hung up with her and called him.
21 I either left him a message or
22 actually talked to him in person or he called me
23 back within five or 10 minutes, I'm not sure.
24 But I talked to him and I told him
25 what had happened with Brittney. And I asked him

Page 57

1 how it was possible that Ms. Buckner could have
2 information that he had been given during an open
3 FBI investigation.
4 And he got very defensive and
5 started accusing me of calling different people,
6 that I was -- I was interfering with his arson
7 investigation. And all I cared about was patient
8 records and I needed, basically, to keep my mouth
9 shut.
10 And so then I ended up calling his
11 superior and told his -- the superior what was
12 going on. And he called me back again and yelled
13 at me on the phone.
14 Q. Do you remember the name of that
15 superior?
16 A. No, I don't.
17 Q. You are saying he -- Agent Von Epps
18 called you back again and then yelled at you?
19 A. Correct. Yes.
20 Q. All right. I think you got off on
21 sort of a tangent, which is -- that's fine. That's
22 good information for me that I might have asked you
23 anyway.
24 What I'm trying to do is -- from
25 your notes you looked at to determine when you went

Page 58

1 to the dumpster on this date.
2 A. Right. So it was -- yeah. It was
3 probably more like August 14th.
4 Q. Okay. I think the point of your
5 story was that you were calling around that time
6 the Fire Chief from Cobb County because you found
7 records that you thought would help the fire
8 investigation?
9 A. I -- I had information that I didn't
10 think was being shared with him by the FBI pointing
11 in the direction that it was Dr. Danielle McBrayer
12 that set his own facility on fire.
13 Q. And that's information that you
14 found in the trash or just like information that
15 you got from other employees and things like that?
16 A. What happened was -- and this is
17 another tangent, but it is definitely part of the
18 story -- several weeks after the FBI confiscated my
19 records --
20 Q. Which was when?
21 A. I think it was the very end of
22 October or the beginning of November. And it was
23 on a Friday at 3:30 in the afternoon they called me
24 and they said they needed to get my records from
25 Dr. McBrayer's office. That they were in charge of

Page 59

1 investigating all HIPAA violations; and, therefore,
2 they needed to have those records and they were not
3 allowed to be in my possession.
4 He said he needed to pick them up
5 within an hour. I believe that was maybe November
6 the 5th -- Friday, November the 5th.
7 Q. Okay.
8 A. It could have been -- it could have
9 been October the 29th.
10 I did not get a receipt of any of
11 the documents that Agent Andy Von Epps got, so I
12 can't tell you the exact date. I don't have notes
13 of that that I could find.
14 But what happened was right after he
15 got those records from me that week -- either that
16 week of the records -- no. It was the week before
17 -- it was probably the day before -- I got a phone
18 call from one of Dr. McBrayer's patients. And I
19 can't remember her name. It may have been Amanda
20 or Heleen -- I can't remember her name, but there
21 is a police report about it which was made.
22 Q. From Cobb County?
23 A. Yeah. Cobb County Police Department
24 took a police report of some of the incidents. I
25 don't have a copy of it. They wouldn't give me it.

Page 60

1 She called me in tears. And I had
2 been calling patients all day long, and I had a
3 whole stack of employee records that I had found in
4 Dr. McBrayer's dumpster.
5 And she was in tears. And the call
6 came into my house. My children were home, so I
7 was trying not to be on the phone. They had just
8 come home from school.
9 She kept asking me, "Is this Michele
10 Wolven?" And I said, "Yes." And she said, "It
11 doesn't sound like you." And -- but she was
12 crying. I said, "What is your name again," and she
13 told me her name. And I said -- I wrote -- I
14 remember I wrote it down on a piece of paper.
15 And she says, "Well, somebody that
16 used your name left me a voicemail and they gave me
17 your name and your phone number." And I said,
18 "Okay."
19 And I'm going through all of the
20 paperwork that I had just called all of these other
21 patients. And I'm saying, "I don't recognize your
22 name. I don't know who you are." But in the back
23 of my mind I had seen her name before.
24 And I said, "What is going on?" She
25 said, "Well, somebody called my office where I

Page 61

1 worked today and told everybody where I worked that
2 I had an abortion. And they said that -- they said
3 that their name was Michele Wolven."
4 And I said, "I'm sorry, I didn't do
5 that. That wasn't me." She said, "Well, the
6 person identifying themselves as Michelle Wolven
7 with your phone number that I just called you on
8 left me a voicemail, and I know that's not your
9 voice."
10 And I said, "I know. I didn't call
11 you. I don't have your patient records here." And
12 I said, "What did they say?" She was in tears, and
13 she said they said that they knew where -- where I
14 worked, they knew my address, and they -- Michele
15 Wolven gave the address that I lived at. They gave
16 my phone number.
17 And they said, "You had an abortion
18 at Dr. McBrayer's office, and, therefore, I'm going
19 to come to your house and kill you." I said -- and
20 I was, basically, crying on the phone with her. I
21 said, "Oh my goodness. I can't believe this. That
22 wasn't me." She said, "I know. It wasn't your
23 voice."
24 And I said, "Okay. You have to
25 report this to the police. It's a terroristic

Page 62

1 threat, you have to report it." She said, "Well,
2 I'm on my way right now. My friend is driving me."
3 She called her from her friend's cell phone.
4 She said, "I'm on my way right now
5 to Dr. McBrayer's office to find out who the hell
6 threw away my patient's records and why I got this
7 phone call." I said, "Well, I will tell you what
8 is going on. Dr. McBrayer is under investigation
9 from the Medical Board, and he could be put in
10 jail. And there was also an arson at his office
11 that I believe he set, and he could go to jail."
12 And I said, "They are setting me
13 up." And she said, "Well, that doesn't make sense
14 because this person was obviously anti-abortion,
15 and it doesn't make sense." I said, "I know it
16 doesn't make sense, but that's what is going on.
17 Would you please call me when you leave there so
18 that I know that you resolved this." She said,
19 "Yes, I will call you as soon as I leave."
20 Well, about two hours passed and she
21 hadn't called me back; so I called the phone number
22 she called me on. And her friend answered the
23 phone. And I asked for her, and she said, "She is
24 not done yet." I identified myself. I said, "I'm
25 Michelle Wolven. I spoke to your friend. She said

Page 63

1 that you were driving her to the facility. Can I
2 talk to her."
3 She said, "No. She is still in the
4 parking lot with the police." I said, "Okay. Can
5 you have her call me as soon as she is done." She
6 said, "Yes. She should be done soon."
7 Probably another hour went by and
8 she never called me back. So I called the Cobb
9 County Police Department and because I knew the
10 police had been there. I said, "Here is what
11 happened. I got a call from a young lady, she had
12 a terroristic threat made against her. I need to
13 make sure that my information is added to this
14 police report because she said to me at least three
15 times that my voice was not the voice on the
16 message that threatened her life."
17 So they checked the police
18 records -- the calls. And they said the only call
19 that came in was from that address at Powers Ferry
20 Road, that there was a problem with protesters on
21 the sidewalk.
22 I said, "Well, there is no
23 protesters on the sidewalk because it is -- it was
24 four or five o'clock in the afternoon and I knew
25 from the schedule that there was never anybody out

Page 64

1 there after three. So my guess was that Angela
2 Buckner had made the phone call and told the police
3 that there was a problem with protesters.
4 Q. Just based on your intuition?
5 A. Just based on the fact that the call
6 came in from the facility saying that there was a
7 problem with protesters. My assumption was that
8 the patient did not make that phone call, but it
9 was made by Angela Buckner.
10 So I said, "Can you please have the
11 officer who took the report call me back. It is
12 very important that my information is in the
13 report." She said, "Sure."
14 He called me back within five or 10
15 minutes. I can't remember his name. I did make a
16 request for the police report about a week later.
17 He made sure all of my information was in the
18 police report. He never was able to give me a copy
19 of the police report, and he said that the FBI took
20 the whole case over.
21 Q. Have you ever requested the police
22 report in an open records request to see what it
23 says?
24 A. Well, I did, but he said that it was
25 classified personal information. And then I said,

Page 65

1 "Well, listen, I need to make sure this is being
2 taken seriously. You know, after this was done I
3 was threatened by Ms. Buckner, an employee; and,
4 you know, this has escalated. I really need to
5 make sure that this is being taken care of."
6 And then about a week later he told
7 me the FBI was handling it, which certainly didn't
8 make me feel any better.
9 Q. Do you know any other information
10 about that incident or that threat that was made to
11 the patient whose name you can't remember today?
12 A. No. But a couple of months down the
13 road I was cleaning my bedroom and I found the
14 packet of information that we gave to Commissioner
15 Cook. And in it there was a supplemental picture
16 packet. And it's not that, it was additional --
17 Q. It's not in Exhibit 12?
18 A. It's not in there. It was -- there
19 was a prescription with her name on it, and that's
20 all that it was. It was like a handwritten -- and
21 I wish I could find it. It's in my house
22 somewhere. I have a file in my house somewhere.
23 But we moved, and I just can't find it. I don't
24 know if it got thrown away.
25 I asked my friend, Lauren, for it.

<p style="text-align: right;">Page 66</p> <p>1 There is a possibility that she may have sent it to 2 you this morning (Indicating). My friend, Lauren 3 Whitaker. It was a handwritten prescription that 4 had her name on it. And it just had, I believe, 5 her name on it, maybe her birthday, and the 6 pharmacy that Dr. McBrayer's office was calling in 7 a prescription. 8 And so when I found that three or 9 four months after this happened, I said that is the 10 smoking gun that proves that somebody in 11 Commissioner Cook's office gave our document to 12 Dr. McBrayer. 13 Q. Gave the packet you are talking 14 about, Exhibit 12? 15 A. Yes, with the information of 16 documents that we found in his dumpster. 17 Q. Explain to me why you said that was 18 the smoking gun. 19 A. The fact that somebody at Dr. 20 McBrayer's office called her saying that I was 21 going to come and kill her. My assumption was that 22 Angela Buckner was getting -- I know that Angela 23 Buckner was getting phone calls from patients that 24 I had called over a course of two or three days. 25 Q. Called -- patients you called about</p>	<p style="text-align: right;">Page 68</p> <p>1 THE WITNESS: To the Fire Chief. 2 MR. VALBUENA: The fire person. 3 Then we got off on why were you giving the fire 4 person stuff. And then we got off on how did you 5 know that -- why did think that Dr. McBrayer 6 committed the fire, and now we have gone somewhere 7 else. 8 MS. TRIBBLE: All right. 9 THE WITNESS: And why did I meet 10 with Commissioner Cook. 11 Q. (BY MS. TRIBBLE) So why did you go 12 to his office on August the 18th to look in the 13 trash? 14 A. That was just a whim. I was coming 15 back from a facility in Buckhead -- another 16 facility that I was doing sidewalk counseling at. 17 And it was 10:30 in the morning and I was driving 18 by the facility. 19 And I had heard from the Fire Chief 20 that they were giving information to the FBI. I 21 just didn't have any confidence at all in them or 22 the Medical Board, because the Medical Board had 23 closed out at least four or five complaints -- 24 investigations that I gave them and took no action 25 against Dr. McBrayer.</p>
<p style="text-align: right;">Page 67</p> <p>1 the records that you found? 2 A. About the records being thrown in 3 the dumpster. 4 Q. Okay. 5 A. And -- 6 Q. How do you know that? 7 A. Based on the one taped conversation 8 that I have with Ms. Buckner and Rachell Graham. 9 Angela Buckner says that, you know, I had been 10 calling a lot of the patients. And that I had 11 broken into their office and stole their records. 12 And -- I'm not even sure where I was going with 13 this. I'm sorry. 14 Q. Again, I'm just trying to figure out 15 how you determined that it was August 18th that you 16 came to the office and found the records in the 17 trash. 18 MR. NASRALLAH: I think she was 19 saying, "No, I think it's more like in July." 20 MS. TRIBBLE: No. She changed her 21 mind. 22 MR. NASRALLAH: I'm sorry. 23 THE WITNESS: I did change my mind. 24 MR. VALBUENA: She said it was based 25 on the email to the --</p>	<p style="text-align: right;">Page 69</p> <p>1 The only action that they ever took 2 against him was for doing criminal abortions, 3 which, of course, he wasn't even sentenced for any 4 jail time -- which he should have gone to jail for 5 10 years for each count that he did. 6 It was on a whim. And I said, "I'm 7 driving by, maybe he is still throwing records 8 away." And when I drove through the parking lot, 9 the -- it was a Saturday morning and it was empty. 10 I thought, "that's weird." There are usually -- 11 from what I understand, there is usually people 12 there until twelve or one o'clock in the afternoon. 13 And so I drove to the dumpster. And 14 I believe I saw employees actually coming out of 15 the gate. And I thought, "Okay. This is the Holy 16 Spirit. They just threw the trash away, it's going 17 to be right there, and it should be very easy to 18 find," because the last trash that would have been 19 in there would have been theirs. 20 So they left -- 21 Q. You saw employees coming out of what 22 gate? 23 A. Out of the gate from where the 24 dumpster was -- the community dumpster. Which 25 there is two wooden doors and they were coming out</p>

Page 70

1 of it. And I -- the gates were open.
2 So when they left I backed my car up
3 in a spot close to the dumpster. I went around the
4 back of the dumpster -- because there is an
5 entrance from the back.
6 And I was able to discern that there
7 was at least five bags of garbage that belonged to
8 Dr. McBrayer because you could see in the --
9 through the white bag the pink slips. And I think
10 there are some of those in the documents that I
11 gave you. I think there are some of the pink
12 slips.
13 Q. You could see the color pink?
14 A. Yeah. It was like a receipt. So I
15 could tell that those were probably from his trash.
16 I may have taken trash that wasn't from him as
17 well, but I believe I had five bags of trash.
18 So I went back there just to see if
19 he was still throwing away patient records.
20 Q. Okay. So August the 18th -- just so
21 you know we can look at that calendar that I
22 have -- it was on a Wednesday.
23 A. I'm sorry. It was the 14th. It
24 would have been the 14th.
25 Q. All right. You mentioned that you

Page 71

1 thought maybe he's still throwing records away.
2 That is based on what information that you had
3 about him doing that in the past?
4 A. The fact that he always did it.
5 Q. How did you know that?
6 A. I had -- every time I ever went to
7 the dumpster I found records of his. There is an
8 email in there between me and one of his employees
9 that took place after the Medical Board
10 investigation from 2010 was closed out. Leslie
11 said that she was mad because nothing was done and
12 he was back to throwing records away again.
13 Q. How many times have you been to the
14 dumpster at Governor's Ridge?
15 A. So -- me personally. I have been
16 there in August of 2012. And then I was there once
17 in the winter. I believe it was in February one
18 time.
19 Q. Of what year?
20 A. Of 2012. And then I was there in
21 2010. I believe that was in the summer of 2010.
22 And I was --
23 Q. Just one time?
24 A. Yes.
25 Q. Okay.

Page 72

1 A. I can't remember if I actually was
2 -- if I actually got documents from the dumpster
3 prior to 2010. I know people that I was working
4 with did.
5 I was present when we went -- we
6 didn't go to the dumpster, but we went to the
7 biohazardous waste bin which was kept on the front
8 porch. And we had been given information that
9 there were fetal remains of second trimester babies
10 in the bin. That was on the front porch.
11 It was a big Rubbermaid container,
12 and -- I was actually pregnant at the time, so I
13 really wasn't going near it. But someone else that
14 I was with went into the bin and she got fetal
15 remains that were hardened bones out of it.
16 And we tried to bring it to the Cobb
17 County District Attorney because it was evidence of
18 second trimester abortions because the only remains
19 that would be hard were the bones, because during a
20 second trimester abortion -- well, during a first
21 trimester abortion everything is soft.
22 So the person who got the remains
23 had to actually go through it with gloves, and she
24 had to pick out arms and limbs that were hard. And
25 she put it in formaldehyde. And we had lawyers,

Page 73

1 and they tried to give the evidence to the District
2 Attorney Pat Head. He said that if we dared to
3 walk into his office that we would be arrested for
4 criminal trespass.
5 Q. Who was the person who got the
6 biohazard material --
7 A. Margarita Shanecky. I can tell you
8 how to spell her name.
9 Q. You can -- David will probably ask
10 you in a little bit.
11 A. Okay.
12 Q. When was that -- the biohazardous
13 incident?
14 A. That was 2007 or 2008.
15 Q. So did you ever go through the
16 biohazard trash after that or before that incident?
17 A. I didn't -- I mean, we did it in --
18 like on the lawn in front of his office.
19 MR. VALBUENA: I think she means any
20 other times.
21 Q. Yeah.
22 A. I don't think so. I believe I did
23 see documents from a time that she went -- that
24 Margarita Shanecky went with Jennifer Hodges and
25 they got records. Then I actually was able to help

Page 74

1 them tape them back together. But I was not at the
2 dumpster. I did not obtain those records.
3 Q. Okay. So you have been yourself,
4 personally, to the Governor's Ridge dumpster on
5 three occasions; once in August of 2012, once in
6 February of 2012, and once in 2010?
7 A. Yes.
8 Q. Okay. And then it sounds like you
9 have also received information from other pro-life
10 activists who you work with who have been to the
11 dumpster themselves?
12 A. Yes.
13 Q. You have also been present when a
14 group of individuals went through the biohazard
15 material outside of Dr. McBrayer's office in 2007
16 or 2008?
17 A. Yes.
18 Q. Any other time when you personally
19 were involved in going through any sort of trash
20 outside of Dr. McBrayer's office?
21 A. No.
22 Q. Have you ever been personally --
23 have you personally ever been inside of Dr.
24 McBrayer's office?
25 A. No.

Page 75

1 Q. Have you ever tried to go inside Dr.
2 McBrayer's office?
3 A. No. I was invited inside by Angela
4 McBrayer; but I did not, no.
5 Q. Have any of your children ever gone
6 inside Dr. McBrayer's office?
7 A. No.
8 Q. So what you are telling me is on a
9 Saturday you had been at another abortion clinic --
10 A. Yes.
11 Q. -- protesting or counseling people
12 on the sidewalk, and then you were driving home
13 around 10:30 AM?
14 A. Yes.
15 Q. And you drove -- I mean, is like
16 Governor's Ridge on your way home or you just drive
17 by?
18 A. Yes. I have to pass right by the
19 exit on my way home. And it is like two minutes
20 off the interstate. And so I had been praying, and
21 something just told me to go; and I went.
22 Q. Because in February of 2012, when
23 you went to the dumpster -- not in August, in
24 February -- did you find patient records then?
25 A. Yes.

Page 76

1 Q. Where are those?
2 A. Those are mostly all in the custody
3 of FBI, and there is maybe a few that have are in
4 the packets that you marked as exhibits.
5 Q. Okay. I think all of the packets
6 that we have marked talk about patient records from
7 July of 2012. Do you know if you have any of the
8 February 2012 trash at home?
9 A. No. Those were all handed over to
10 the Georgia Medical Board.
11 Q. So at home, on your person, in your
12 care, in your office, you don't have any of the
13 2012 February records that you recovered from the
14 trash?
15 A. The only thing that I have is what
16 -- would have been like in that supplemental, which
17 I don't think that packet that we gave to the
18 Commission was in there -- the photos of the actual
19 patient records.
20 There might be an email from Lauren
21 Whitaker who went to Commissioner Cook's meeting
22 with me. She is a person who had custody of all of
23 the records from February.
24 Q. What is her name?
25 A. Lauren Whitaker.

Page 77

1 Q. Currently, you don't possess any of
2 the records -- patient records that you found in
3 the trash in February of 2012?
4 A. Correct.
5 Q. Other than what might be included in
6 what we have marked?
7 A. Correct.
8 Q. You would be there -- either Lauren
9 Whitaker has it, the Department of Community Health
10 has it, or the Medical Board has it or the FBI?
11 A. Yes.
12 Q. All right. Did you call any of
13 those patients whose records you found in February
14 of 2012?
15 A. We did not.
16 Q. Okay. Why is that?
17 A. I didn't have them. I didn't have
18 those records.
19 Q. Do you know if Ms. Whitaker called
20 any of the patients?
21 A. I do not think she did.
22 Q. Do you know why she didn't?
23 A. We were under the assumption that
24 the Medical Board was taking care of it.
25 Q. Because you had given them the

<p style="text-align: right;">Page 78</p> <p>1 information? 2 A. Yes. 3 Q. All right. What made you go to the 4 dumpster in February of 2012? 5 A. Okay. I've already explained some 6 of this, but we were preparing for a meeting with 7 Commissioner David Cook. I had already had a 8 meeting with Governor Deal's staff which was set up 9 for me by the Attorney General, Sam Olens. 10 That meeting resulted in them saying 11 that they were too busy to do anything for the 12 opinion statement and to please meet with 13 Commissioner Cook. 14 So our whole meeting that we were 15 preparing for was to explain to Commissioner David 16 Cook -- who was in charge of licensing all 17 healthcare facilities. He was basically over the 18 Medical Board -- was the extreme need for doctors 19 who were, basically, using their private offices as 20 ambulatory surgical centers to be licensed for the 21 safety of their patients. 22 What we had found was that over the 23 years more and more of the licensed ambulatory 24 surgical centers that did abortions were closing 25 down either by the State or because the doctors had</p>	<p style="text-align: right;">Page 80</p> <p>1 to see if he was throwing away patient information; 2 it was to see if he was throwing away information 3 that would help the meeting with the Commissioner 4 regarding unlicensed ambulatory surgery centers. 5 A. Yes. 6 Q. Then you -- in part of that trash 7 what you remember finding is some patient 8 information? 9 A. Correct. 10 Q. So going back to the August 14th, 11 2012, visit to the dumpster. 12 A. Okay. 13 Q. When you drove in were you with 14 anyone? 15 A. No. 16 Q. And you saw -- you told me you saw 17 some employees coming out of the wooden gate that 18 enclosed the dumpster. 19 A. Yes. 20 Q. Employees that you knew worked for 21 Dr. McBrayer's office? 22 A. Well, I assumed they did because 23 they were wearing scrubs. And on a Saturday there 24 was like no other offices that I knew of that were 25 open, and -- certainly not medical offices. So I</p>
<p style="text-align: right;">Page 79</p> <p>1 retired. 2 And so now there was about ten 3 different facilities at the time that we had the 4 meeting with David Cook that were operating under 5 the law as ambulatory surgical centers -- meaning 6 that their primary business was surgery, but they 7 weren't licensed by the state. So there was 8 actually no oversight. 9 There was no inspections; there was 10 nothing that could be done. The only complaint 11 that a person could make would be to the Medical 12 Board. And we had already known that the Medical 13 Board didn't do anything. 14 In fact, when they found out that 15 Dr. McBrayer did illegal felony abortions, they 16 slapped him on the wrist and they gave him a fine 17 and gave him like 40 hours of continuing education 18 service. 19 So we were trying to explain to him 20 why it was so important. We decided that it was a 21 very good possibility that Dr. McBrayer could still 22 be throwing documents away since he had in the 23 past. And we decided to go to the dumpster in 24 February to see if that was the case. 25 Q. So you weren't going to the dumpster</p>	<p style="text-align: right;">Page 81</p> <p>1 assumed that they were employees for Dr. McBrayer. 2 I may have recognized them, I may have not. I just 3 saw that they were in scrubs. 4 Q. So you thought that's probably -- 5 that could be Dr. McBrayer's employees and maybe 6 they had just thrown away some trash? 7 A. Exactly. 8 Q. And what was your point -- what you 9 were trying to see was thrown out on that visit; 10 more information that could help the Department of 11 Community Health? 12 A. Yes. At that point the Medical 13 Board was investigating him for various things. I 14 thought -- I was sort of thinking that if they were 15 throwing records away, that maybe they weren't 16 aware that they were being investigated maybe. I 17 just decided that I just needed to go just to find 18 out what was going on for myself. 19 Q. And so did anyone from Dr. 20 McBrayer's office give you the heads up that they 21 were putting anything in the trash that day? 22 A. No. 23 Q. Had anyone in Dr. McBrayer's office 24 ever told you that they were going to be throwing 25 away patient records and you should come by and --</p>

<p style="text-align: right;">Page 82</p> <p>1 A. Yes. 2 Q. Who was that? 3 A. Leslie Barrett Summerone. 4 Q. Summerour? 5 A. Yes. 6 Q. S-U-M-M-E-R-O-U-R? 7 A. Yes. 8 Q. I'm looking at an email from her. 9 Did she give you a specific date, 10 "They are throwing out records today, come get the 11 trash?" 12 A. I believe so. I don't know if -- if 13 it is in there. It should be in there. But there 14 was a time that she, I believe -- it would have 15 been a text message probably. So, actually, the 16 email wouldn't be from her, but it would have been 17 from me asking people who were on the sidewalk if 18 they were going to be there that day. Because 19 Leslie sent me a text -- I believe it was sometime 20 in 2011 after the Medical Board closed out the 2010 21 investigation. And she sent me a text saying that 22 he had done a second trimester abortion and that 23 she knew that there was an ultrasound of that baby 24 that she had just aborted in the trash. 25 Q. Was that something that she put in</p>	<p style="text-align: right;">Page 84</p> <p>1 investigations that were going on against Dr. 2 McBrayer? 3 A. Absolutely not. 4 Q. What about from Chris Diniz? 5 A. Who? 6 Q. Chris Diniz. 7 A. No. I never spoke directly to 8 Chris. A friend of mine, Sharita, would -- she is 9 -- she is not Hispanic. Her name is Sarah Butler. 10 But her parents were Spanish missionaries, so she 11 knew Spanish. They all called her Sharita, because 12 that was the Spanish name. 13 She would have phone call 14 conversations with Chris, and she helped me to 15 correspond with Chris through email. But I never 16 spoke to Chris personally on the phone or anything. 17 Q. And what about any of the other 18 anti-abortion activists who you were working with; 19 did anyone get any information from an employee at 20 Dr. McBrayer's office they were going to be 21 throwing away patient records or any sort of 22 records that might be helpful for an investigation 23 against him -- 24 A. No. 25 Q. -- the week before you went there on</p>
<p style="text-align: right;">Page 83</p> <p>1 the trash for you to find? 2 A. She didn't say. She just said that 3 she knew it was in the trash, and if you wanted to, 4 to go to the dumpster and get it. 5 Q. Do you know if any of the other 6 activists that day went to the dumpster and got the 7 information? 8 A. Nobody got it because at that point 9 we could not trust Leslie. She had told us many 10 times she planned to quit and wanted to -- she 11 wanted counseling to get over the trauma that she 12 had been through from working there. And at that 13 point I felt like she might have been setting us 14 up. 15 MR. NASRALLAH: Sorry to interrupt. 16 Can you try to put this to a time and date. 17 MS. TRIBBLE: She said it was 2011. 18 MR. NASRALLAH: For the 19 communications with Leslie about this. Okay. 20 Thank you. 21 Q. (BY MS. TRIBBLE) Is that true? 22 A. I believe so. 23 Q. Had anyone communicated with you in 24 August of 2012 that there would be any sort of 25 records for you to find that could help any of the</p>	<p style="text-align: right;">Page 85</p> <p>1 Saturday? 2 A. No. 3 Q. So when you got there you were by 4 yourself -- 5 A. Yes. 6 Q. -- in your car? 7 What kind of car did you drive at 8 the time? 9 A. It was probably a 2000 Infiniti. 10 Q. SUV? 11 A. I-30 Infiniti, I believe. 12 Q. Is that an SUV or sedan? 13 A. A sedan. 14 Q. Do you have material in your car 15 like gloves and blankets that you could protect the 16 car and yourself if you found trash? 17 A. Yes. Because I had previously 18 gotten stuff and I kept it in the trunk, yes. 19 Q. From what office? 20 A. From Piedmont Road, Dr. Tyrone 21 Malloy's facility, and several other doctors at 22 that same facility. 23 Q. What other clinics that performed 24 abortions have you gone through the trash? 25 A. Just me personally?</p>

<p style="text-align: right;">Page 86</p> <p>1 Q. Yes.</p> <p>2 A. Just Dr. McBrayer's. And personally</p> <p>3 I went through trash at Summit and Atlanta Womens</p> <p>4 Choice, which is -- it used to be Atlanta Surgery</p> <p>5 Center. And Dr. Malloy worked at both clinics.</p> <p>6 They are on top of each other.</p> <p>7 Q. Since August of 2012 have you been</p> <p>8 through the trash at any other clinic that performs</p> <p>9 abortions in the Marietta/Atlanta area?</p> <p>10 A. No.</p> <p>11 Q. What about anywhere else?</p> <p>12 A. No.</p> <p>13 Q. Have you sent anyone on behalf of</p> <p>14 your mission -- pro-life missions to go through</p> <p>15 trash at any other clinic in the Atlanta or Georgia</p> <p>16 area?</p> <p>17 A. Yeah. And I don't know when the</p> <p>18 date is. I don't know if it was prior to 2012. It</p> <p>19 was probably right after. There were pro-life</p> <p>20 activists friends of mine who obtained trash from a</p> <p>21 facility in Columbus, Georgia.</p> <p>22 Q. Okay. Based on your recommendation?</p> <p>23 A. Yes. They had heard that -- what we</p> <p>24 had found.</p> <p>25 Q. You are talking about patient</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Okay. So you mentioned -- you made</p> <p>2 a comment earlier that you hadn't personally been</p> <p>3 to protests at Dr. McBrayer's office since the</p> <p>4 '90s?</p> <p>5 A. I believe the last time I actually</p> <p>6 stood out -- well, okay. Before -- I went to a</p> <p>7 prayer vigil probably in 2013. It was a day that</p> <p>8 there was a police permit and I actually did go</p> <p>9 down there that day.</p> <p>10 But prior to that -- that was me</p> <p>11 being part of a big prayer vigil. Prior to that --</p> <p>12 and I only went that day because it was supposed to</p> <p>13 be -- the Holy Eucharist was supposed to be exposed</p> <p>14 and it was supposed to be a very sacred thing.</p> <p>15 Q. On the sidewalk?</p> <p>16 A. In the street. Because there was</p> <p>17 thousands of people there that day. So I was going</p> <p>18 as a Catholic to be there with my fellow Catholics.</p> <p>19 So prior to that that I actually</p> <p>20 protested in front of his facility -- it's very</p> <p>21 possible that after the Cobb County Police</p> <p>22 Department closed out the investigation that I did</p> <p>23 go there because -- you know, that's -- we are</p> <p>24 going back a long time.</p> <p>25 There was a period of time that we</p>
<p style="text-align: right;">Page 87</p> <p>1 information?</p> <p>2 A. They knew -- yeah. They were aware</p> <p>3 that we had found patient records in</p> <p>4 Dr. McBrayer's.</p> <p>5 Q. Did you send them down there to see</p> <p>6 if they could find the same information from</p> <p>7 another doctor's office?</p> <p>8 A. Yeah. I suggested that -- since I</p> <p>9 knew that they threw patient records away at</p> <p>10 Summit, at Dr. Malloy's office, and also at</p> <p>11 Dr. Williams' office in College Park -- which I had</p> <p>12 not obtained. That was sent to me from a person in</p> <p>13 Tennessee, I believe, or Alabama -- that it was a</p> <p>14 practice that doctors did this.</p> <p>15 Q. So is -- I'm going to talk about</p> <p>16 this in a little bit more detail later. But the</p> <p>17 going through -- finding trash and going through</p> <p>18 the trash, is that sort of a known method of</p> <p>19 investigating abortion clinics?</p> <p>20 A. Yes. I had known that in the</p> <p>21 past -- going back in the '80s and '90s it was very</p> <p>22 routine that doctors would just throw away fetal</p> <p>23 remains and other sorts of patient documents. I</p> <p>24 knew that from -- I believe there was even</p> <p>25 television reports and newspaper clippings.</p>	<p style="text-align: right;">Page 89</p> <p>1 used to go out there during our lunch hour -- I</p> <p>2 just don't know if it was -- if it was prior to the</p> <p>3 police investigation or after it. But we did used</p> <p>4 to go out there and stand on the sidewalk with</p> <p>5 signs for a period of maybe six months.</p> <p>6 I just don't know when that was. I</p> <p>7 can't remember if it was after the Cobb County</p> <p>8 Police Department had the investigation closed out</p> <p>9 by Pat Head or --</p> <p>10 Q. Regarding second trimester</p> <p>11 abortions?</p> <p>12 A. Yes. I don't know what the time</p> <p>13 period was.</p> <p>14 Q. How many times have you personally</p> <p>15 protested or attended prayer vigils or anything in</p> <p>16 protest of abortions outside of Dr. McBrayer's</p> <p>17 office on Governor's Ridge?</p> <p>18 A. At other facilities?</p> <p>19 Q. Just outside of Dr. McBrayer's</p> <p>20 office at Governor's Ridge. How many times have</p> <p>21 you been there in person to do any sort of protest</p> <p>22 or religious ceremony?</p> <p>23 A. Probably 30.</p> <p>24 Q. And you think the last time might</p> <p>25 have been the prayer vigil in 2013?</p>

Page 90

1 A. I think it was 2013.
2 Q. Okay. Why were you told back in the
3 '90s by cops not to go to Dr. McBrayer's office to
4 protest?
5 A. The police officer that was in
6 charge of crimes against persons -- that was in
7 charge of the investigation, who took all of my
8 information, said that he had looked my name up in
9 their data bank and he had seen that Dr. McBrayer's
10 office had called the police on me.
11 And he said that in order for them
12 to do their investigation and to catch him, that I
13 needed to just not go there anymore and to not tell
14 anybody what was going on with the investigation.
15 And that hopefully very soon I would turn on the TV
16 and I would see him being arrested.
17 So I was told not to go there
18 because they just wanted to let him do his thing so
19 they could catch him. And somehow they felt that,
20 I guess, that I might interfere. I don't know.
21 Q. So it wasn't because you had been
22 arrested or anything like that?
23 A. No.
24 Q. Okay. I'm going to mark this as
25 Defendant's Exhibit 22.

Page 91

1 (WHEREUPON, a document was marked as
2 Defendant's Exhibit 22 and is attached to the
3 original transcript.)
4 Q. These are the records that I have
5 been provided by Mr. Nasrallah as the
6 representative of what you found in the trash for
7 the four plaintiffs in this case.
8 A. Okay.
9 Q. I will show you a copy of that.
10 A. All right.
11 Q. Here is a little paper clip when you
12 are done.
13 A. Okay.
14 Q. If you will just go through those.
15 (Pause)
16 A. I don't recognize the name.
17 (Pause)
18 Q. You can keep them. I am going to
19 ask you some questions about them.
20 A. Okay.
21 Q. There is a couple of handwritten --
22 I think three pages of handwritten notes behind
23 several of the patient records.
24 Are those your handwritten notes?
25 A. Yes, I believe so.

Page 92

1 Q. Apart from the pages of handwritten
2 notes that are in that Exhibit 22, are those all of
3 the records from these four women who you -- that
4 you found in the trash on August the 14th, 2012?
5 A. I believe so.
6 Q. Okay. No one from Dr. McBrayer's
7 office actually handed you or provided you those
8 records; is that true?
9 A. Absolutely not. Nobody handed me
10 these records.
11 Q. Let me ask it again.
12 A. I found it in the trash.
13 Q. No one from Dr. McBrayer's office
14 personally handed you these records?
15 A. Correct.
16 Q. No one from Dr. McBrayer's office
17 has ever personally disclosed patient information
18 to you?
19 A. No. Correct.
20 Q. All right. So when you found -- I'm
21 going to ask you some questions about those
22 records.
23 When you found the five trash bags
24 on August the 14th, 2012, did you just take the
25 bags and then go home?

Page 93

1 A. Yes. I put them in my trunk and was
2 out of the parking lot within two or three minutes.
3 Q. Did you take any photographs?
4 A. No -- yeah -- no. I was actually
5 stunned about what was in them.
6 Q. Did you go through the bags when you
7 -- at the dumpster area or when you got home?
8 A. When I got home.
9 Q. All right. Were the bags sealed?
10 A. They were tied. They were knotted.
11 Q. And were the bags sort of like the
12 white trash bags or the black trash bags or a mix?
13 A. Yeah. They were all white, I
14 believe, with red ties.
15 Q. So sort of like the opaque white
16 kitchen trash bags?
17 A. Yes.
18 Q. With red ties, you said?
19 A. Yes.
20 Q. All right. So you took those -- the
21 sealed trash bags -- five of them -- put them in
22 your trunk; yes?
23 A. Correct.
24 Q. Drove home?
25 A. Yes.

<p style="text-align: right;">Page 94</p> <p>1 Q. Took them out of your trunk? 2 A. Yes. 3 Q. And opened them? 4 A. Yes. 5 Q. You actually unsealed the trash bags 6 at your house? 7 A. Yes. 8 Q. And I think you told me earlier, Ms. 9 Wolven, that when you got to the dumpster area you 10 saw five trash bags that you thought might have 11 been Dr. McBrayer's because you saw some pink 12 colored paper in them? 13 A. Correct. 14 Q. Okay. Were you able to visualize 15 anything else in the trash bag before you opened 16 it? 17 A. No. 18 Q. Okay. 19 A. Maybe some garbage, like food. And 20 I knew they threw food away with papers, so -- 21 Q. So you weren't able to visualize any 22 of the patient records that you later found after 23 you opened the trash bags before you opened them, 24 true? 25 A. I believe you are correct.</p>	<p style="text-align: right;">Page 96</p> <p>1 dumpster? 2 MR. NASRALLAH: Object to the form. 3 A. Yes. There may have been one on the 4 ground. I know there was garbage on the ground, 5 but I don't know that the garbage that was on the 6 ground was Dr. McBrayer's. I don't know if I took 7 it or not. 8 Q. Okay. So what you are telling me is 9 you know that you took some bags that were inside 10 of the dumpster but at the top of the dumpster? 11 A. Correct. 12 Q. Okay. There were some bags outside 13 on the ground of the dumpster; but sitting here 14 today, you don't know if those bags were ones that 15 you took? 16 A. Correct. Because it seemed like -- 17 since the dumpster was so overfilled that there was 18 just garbage everywhere on the outside of the 19 dumpster, even behind it. 20 Q. All right. So then tell me what 21 happened when you got home with the trash. 22 A. Okay. So I probably waited, you 23 know, a couple of hours because it had been hours 24 since I had eaten. 25 I probably opened up the trash</p>
<p style="text-align: right;">Page 95</p> <p>1 Q. How long were you actually at the 2 Governor's Ridge trash dump area? 3 A. Maybe two or three minutes. 4 Q. Were the trash bags in the dumpster? 5 A. They were on the top. These 6 particular ones, I believe, were actually on the 7 very top. The dumpster was overflowing with 8 garbage that day. 9 And there is a possibility that one 10 or two of them might have been on the ground, but I 11 believe they were all overflowing on the top of the 12 dumpster. 13 Q. Like inside the dumpster on the top 14 of the dumpster? 15 A. Yeah. The dumpster is one of those 16 big haul-off things with a big lid on it. The lid 17 was open and it was all filled. And these -- most 18 of the bags, I believe, were on the very top and 19 like -- but on sides, because it was so filled that 20 they were like almost hanging over the sides. 21 MR. VALBUENA: But the lid was open 22 or shut? 23 A. The lid was open. The gates was 24 open and the lid was open. 25 Q. But the bags were inside the</p>	<p style="text-align: right;">Page 97</p> <p>1 sometime in the afternoon. And I started sorting 2 through it and throwing away the disgusting food 3 mess that was intermingled with all of the 4 different records that were taped up. 5 I attempted to try and figure out 6 what trash might be pertinent so that I could sort 7 through and get rid of most of it; because most of 8 it was food and paper, that sort of thing. 9 Q. Were any of the records that are 10 included in Exhibit 22 records that you had to tape 11 together? 12 A. Yes. 13 Q. Okay. 14 A. I believe they were all taped 15 together. 16 Q. So what you are saying is some of 17 the records were torn -- all of those records -- 18 were they thrown up? 19 A. I believe everything was torn up 20 that is in this packet right here. Maybe the 21 Georgia license one might not have been. I think I 22 even had to tape that up. 23 Q. Just to confirm, Ms. Wolven. You 24 don't possess the original version of the records 25 that are included in Exhibit 22?</p>

Page 98

1 A. Correct.
2 Q. You gave those to the FBI?
3 A. Correct.
4 Q. Okay. I want to talk to you about
5 -- I'm going to kind of go in order of these
6 records.
7 The first one I believe is Christy
8 Huiel.
9 A. Okay.
10 Q. Did you contact her on the
11 telephone?
12 A. Yes.
13 Q. When?
14 A. So -- it must have been probably the
15 end of October, maybe the very beginning -- maybe
16 the very beginning of November. I'm not exactly
17 sure of the time. I might have some notes on here.
18 Q. I will give you Exhibit 15.
19 A. Okay.
20 Q. I don't know if these are in order.
21 A. Okay. Right.
22 Q. But there are some emails from --
23 between you and Ms. Huiel. I believe that started
24 October the 11th.
25 And I'm going to mark as Exhibit 23

Page 99

1 emails that Ms. -- that Matt Nasrallah provided me
2 from Ms. Huiel.
3 (WHEREUPON, a document was marked as
4 Defendant's Exhibit 23 and is attached to the
5 original transcript.)
6 Q. Between she and you two.
7 A. Okay.
8 Q. I think the first email, Ms. Wolven,
9 between you and Ms. Huiel was October the 11th. If
10 that's true, does that refresh your memory of when
11 you all --
12 A. That would make sense. The timing
13 would -- if that's what the email says, that would
14 make sense for the time frame.
15 Q. Okay. So why did you wait over a
16 month to call Ms. Huiel after you found these
17 records?
18 A. Yeah. It was months. It was, what,
19 three months.
20 Q. Yes. I'm sorry.
21 A. And the reason why was because we
22 were in touch constantly with Agent Emily Kirkland,
23 who was the head of investigations for the Medical
24 Board. She was the person investigating
25 Dr. McBrayer at the time.

Page 100

1 And we were constantly in touch with
2 her because we were sending employees that had quit
3 after Chris was fired to testify to her of all of
4 the illegal activity that was going on in the
5 clinic. And so we were constantly trying to figure
6 out when there was going to be action taken against
7 Dr. McBrayer.
8 And as the five or six months was
9 approaching I started to lose all faith in the
10 Medical Board. And I said -- since Commissioner
11 Cook's office said that I was supposed to contact
12 the US Civil Rights office to report the HIPAA
13 violations -- and I couldn't do that on my own;
14 only a patient can do that -- that I needed to go
15 ahead and let these patients know that Dr. McBrayer
16 had broken their trust and the HIPAA law, and that
17 the Medical Board had been aware of this for many
18 years and did nothing about it.
19 And, therefore, that they should
20 contact the Medical Board and let them know that
21 they were very upset, that they were aware their
22 files were thrown away, and to also make a HIPAA
23 violation complaint to the US Civil Rights office.
24 Q. So you didn't -- let me see if I can
25 summarize this and you tell me if it's true.

Page 101

1 You didn't initially call any of
2 these four women whose records you found on August
3 the 14th, 2012, because you were hoping that the
4 Medical Board would complete its investigation and
5 issue some sort of punishment of Dr. McBrayer?
6 A. Correct.
7 Q. But when you realized that wasn't
8 going to happen, you took it upon yourself to
9 contact these women and let them know that they
10 could complain to the Medical Board and/or you said
11 the US Civil Rights Division regarding a HIPAA
12 violation?
13 A. Yes.
14 Q. Okay. I'm sorry to back up here.
15 What else did you find in the five
16 trash bags other than these four women's patient
17 records?
18 A. A lot of other patient records,
19 receipt tallies of cash that they took in for the
20 day. I believe there was landlord notices from
21 tenants of Dr. McBrayer complaining about the
22 condition of their houses.
23 Faxes sent maybe to the National
24 Abortion Federation. I believe there was
25 information in there that the National Abortion

<p style="text-align: right;">Page 102</p> <p>1 Federation was paying checks to Dr. McBrayer's 2 office to pay for large parts of the abortions. 3 There may be Medicaid faxes that I 4 saw. There might be some invoices in there from 5 ordering medical supplies. 6 Q. You said earlier food as well? 7 A. There was food, yeah. There was, I 8 think, time sheets of staff saying that they needed 9 to take a personal day, that sort of thing. The 10 employee log, which had -- I guess it was a contact 11 sheet with every employee's name and their phone 12 number and I think maybe what their position was 13 there. 14 Q. That was in the trash too? 15 A. Yes. And there was also internal 16 office memos that were written. It looked like 17 there were supposed to be disciplinary actions that 18 they were maybe going to take against an employee. 19 Q. Do you remember him? 20 A. Cries Diniz. 21 Q. Diniz. However you pronounce his 22 name. 23 A. Yes. 24 Q. And out of the five trash bags do 25 you remember if those all came from Dr. McBrayer's</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. But you had only been there -- 2 A. The three times. 3 Q. Two other times before this? 4 A. Right. 5 Q. So the statement that he constantly 6 did that -- that's not personal information that 7 you have? 8 A. No. I only had been told that from 9 at least one or two employees who said that that 10 was common practice. And I also learned through a 11 deposition from another case that Sheila Bynum -- 12 who was hired as the office manager after 13 Dr. McBrayer, I guess, fired his niece -- that 14 Sheila Bynum said that they didn't even own a 15 shredder until she came and took over. 16 Q. That's a deposition from this case 17 that you have read? 18 A. No. It was a statement, I believe, 19 that was given during a deposition during another 20 case. 21 Q. Who told you that? 22 A. Dee Dee Farmer. 23 Q. Who is that? 24 A. She is the office manager for Cobb 25 Pediatrics.</p>
<p style="text-align: right;">Page 103</p> <p>1 office? 2 A. I believe it turned -- I believe it 3 turned out that all of that trash was, indeed, his 4 trash. 5 Q. Okay. Anything else that you 6 remember, sitting here today, of information that 7 you found in the trash, other than what you have 8 told me? 9 A. Not that I took. I mean -- I think 10 I might have seen -- when I was taking the trash I 11 think there was a bank -- a mortgage company had 12 thrown away a whole bunch of information on 13 personal identifiable information from people who 14 had applied for loans, but I don't think I took 15 that trash. 16 Q. How did you know that that trash was 17 thrown out? 18 A. Actually, it was just like papers. 19 It was -- from what I recall, I believe it was just 20 stacked up in a stack. It wasn't shredded. 21 And that was one of my concerns was 22 that there was constantly trash all around the bin, 23 and this was something that Dr. McBrayer did 24 constantly. And so anybody could get their 25 information.</p>	<p style="text-align: right;">Page 105</p> <p>1 Q. How did she know that information? 2 A. She was in -- I believe she was 3 present during the deposition. 4 Q. What case was that; do you know? 5 A. It was the case that Cobb Pediatrics 6 had against Sheila Bynum. 7 Q. So you have never read a deposition 8 of Ms. Bynum? 9 A. No. She told me that they were 10 aware that Sheila Bynum was breaking all kind of 11 laws, and she admitted that Dr. McBrayer had never 12 even owned a shredder. 13 Q. Okay. So how many times had you -- 14 going back to Ms. Huiel -- did you call Ms. Huiel? 15 A. I think I only probably -- probably 16 only the one time that I actually spoke to her on 17 the phone, and then any other correspondence would 18 have been through email. 19 Q. All right. So based on my 20 recollection when I took Ms. Huiel's deposition, 21 she believes that you actually called her on 22 October the 11th, and then she sent you an email 23 asking for you to send her records to you? 24 A. Right. 25 Q. Which you did?</p>

<p style="text-align: right;">Page 106</p> <p>1 A. Yes. 2 Q. You sent her a copy of the records 3 that you had? 4 A. Correct. 5 Q. And then you have a note -- if you 6 will flip to that Exhibit 22, the records -- 7 A. Okay. 8 Q. It's the fourth page. 9 A. Yes. 10 Q. Is this your handwriting on page 11 four of Exhibit 22? 12 A. Yes. 13 Q. What does it say? 14 A. "Send her records via email 10/11. 15 Checkmark." 16 Q. Okay. Tell me with regard to Ms. 17 Huiel, if you have an independent memory, what you 18 told her on the telephone. 19 A. Okay. I believe I started the 20 conversation the same as I did with all of the 21 patients who I contact. That would have been 22 asking for the person who I was calling. So, 23 "Hello, is Christy Huiel there." And I then, "Yes, 24 this is Christy." 25 "My name is Michelle Wolven. I</p>	<p style="text-align: right;">Page 108</p> <p>1 more that was your general spiel? 2 A. Yes. 3 Q. Okay. 4 MR. NASRALLAH: How do you spell 5 that. 6 MS. TRIBBLE: S-P-I-E-L. 7 MR. NASRALLAH: I'm sorry. I was 8 just curious. 9 Q. (BY MS. TRIBBLE) So would you ever 10 tell any of the patients who you called that, "I 11 know you had an abortion;" or was it, "I know you 12 have been to Dr. McBrayer's office on this date?" 13 A. Yeah. Most of the time I told them 14 I did not know what their procedure was. I don't 15 know if I said -- if I told Christy -- I don't even 16 know if she did have an abortion. I guess she did. 17 Based on this, she probably did have an abortion. 18 I tried to be very careful about 19 that topic because it is very personal. And so I 20 generally just wanted to let them know that their 21 records -- their personal identifiable information 22 had been compromised. That he had done it in the 23 past; and, therefore, they needed to be aware of 24 it. 25 Q. You can look through the records if</p>
<p style="text-align: right;">Page 107</p> <p>1 wanted to let you know that your medical records 2 were thrown in the trash, and I have copies of them 3 from when you were at a visit to Dr. Daniel 4 McBrayer's office in Cobb County," on such-and-such 5 date. 6 And, "I do not work for Dr. 7 McBrayer, I work -- I'm an independent 8 investigator. I do abortion background research. 9 I have an organization called Eagle Watch. And I 10 wanted to let you know that Dr. McBrayer is 11 currently under investigation for -- by the Medical 12 Board for various things, including throwing away 13 patient records." 14 "And the Medical Board has known 15 about this for years and they have never taken 16 action against him. And you also have a right to 17 contact the US Civil Rights Department to make your 18 own HIPAA violation complaint because this is an 19 obvious HIPAA violation." 20 And I may have given them 21 information to call the FBI -- I don't know if I 22 did or not, but I may have. 23 Q. So it sounds like you don't have an 24 independent memory of your specific conversations 25 with Ms. Huiel or any of these four women; it's</p>	<p style="text-align: right;">Page 109</p> <p>1 you want any detail to respond to this question. 2 But it's true that based on the 3 records that are included in Exhibit 22 -- that 4 none of those records indicate that the patients 5 actually had an abortion? Any of those four women. 6 MR. NASRALLAH: Object to the form. 7 You can answer. 8 A. Based on these records, I would say 9 these were the intake records from the abortion 10 facility in the basement, that they were 11 registering when they come in to say that -- and, 12 in fact, I know this VIP second day handwriting, I 13 believe, is Leslie's handwriting. I think it might 14 even be in the email exchange, I think. 15 She may have said something about 16 some of the different people that took these, 17 because in 2014 or 2015 -- when we were working to 18 try and close down the West Cobb facility -- this 19 whole topic came up. 20 And it's my understanding that all 21 of this -- at least the patient registration forms 22 and anything about a first day is definitely 23 related to an abortion, because they would come 24 in -- a first day visit was usually a Medicaid 25 patient. They would come in and Dr. McBrayer would</p>

<p style="text-align: right;">Page 110</p> <p>1 get their Medicaid form, their ID. He would give 2 them a \$50 discount, and then he would bill 3 Medicaid, which is highly illegal. 4 Q. That's information that you gained 5 in 2014 or 2015? 6 A. About the Medicaid fraud? 7 Q. No. About the -- any of this 8 information being related to a pre-abortion -- 9 A. I have seen these before when we -- 10 when I got them -- similar documents like this from 11 the dumpster in 2010. And from looking at these, 12 knowing that when a patient comes in they have to 13 put down a contact person that will be waiting in 14 the parking lot. 15 And so like from this one here you 16 can see it says -- the person's friend is Thomas 17 Florence, and a phone number. That is the driver. 18 Q. How do you know that just based on 19 that form? 20 A. Just based on the form because -- 21 Q. How do you know that based on that 22 form, is what I want to know. 23 A. From being at abortion facilities 24 thousands and thousands of times I know what the 25 procedure is. And when you -- when you have</p>	<p style="text-align: right;">Page 112</p> <p>1 Exhibit 22 -- does it say anywhere that that 2 individual -- the emergency contact is the 3 individual who is going to pick up the patient 4 after the abortion? 5 A. No. 6 Q. All right. So then the next page 7 you are flipping to, page three of Ms. Huiel's 8 records. 9 A. Yes. 10 MR. NASRALLAH: What is the question 11 that is pending? 12 MS. TRIBBLE: She -- 13 MR. VALBUENA: There isn't one yet. 14 MS. TRIBBLE: I was interrupting 15 her, and she was going to say based on -- 16 Q. (BY MS. TRIBBLE) Is there anything 17 based on page three that says Ms. Huiel had an 18 abortion -- 19 A. Yeah. 20 Q. -- on this day? 21 A. So let's see if the dates are the 22 same. I can't quite make out -- it looks like the 23 date on the receipt is from maybe July the 9th. 24 Q. On the first page it says July 9, 25 2012?</p>
<p style="text-align: right;">Page 111</p> <p>1 anesthesia the patients aren't able to walk. And 2 at Dr. McBrayer's office sometimes they had to be 3 carried out. So it was a requirement that they had 4 to have a driver there waiting the entire time. 5 And from another lawsuit it's my 6 understanding that that was one of the reasons why 7 Governor's Ridge was suing Dr. McBrayer was because 8 they constantly had people hanging out in the 9 parking lot waiting. So it's my impression that 10 the emergency contact is their driver. 11 Q. But does it say that on the form? 12 A. It says their emergency contact. It 13 has a phone number, and I know that they would -- 14 well, after talking to some of the employees who 15 quit they said that what they would do is they 16 would call the number that was on the form and they 17 would let them know that they could come and -- to 18 the door to pick them up. They would then move 19 their cars. It -- during the week there was no 20 parking. 21 This here -- 22 Q. Let me just -- before you flip, 23 sorry. 24 A. Okay. 25 Q. The form that you are on page two of</p>	<p style="text-align: right;">Page 113</p> <p>1 A. And then on the AB Patient Call 2 Sheet -- this here was probably filled out -- I 3 don't know if Christy filled it out. I have seen 4 these before. 5 And the patients put down how many 6 weeks pregnant they are. She is six weeks. You 7 are also suppose to put down whether you are -- if 8 you are Rh negative, because if you are they have 9 to give you a shot after the abortion. 10 So looking at this sheet -- it also 11 says on here prices. Eight to eleven weeks, an 12 English patient pays \$450. I know those are 13 abortion prices. 14 I know this first day and the second 15 day -- the \$35 -- maybe she had a medical abortion 16 and so she came in two separate times to get the 17 meds. Based on this -- looking at it closely, I 18 would have to say she had an abortion. 19 Q. Does anything on this page -- just 20 on the face of it -- say that she had an abortion 21 on any specific day at Dr. McBrayer's office? 22 MR. VALBUENA: You mean does it 23 state the specific word "abortion?" 24 Q. Does it say that Ms. Huiel had an 25 abortion on any day at Dr. McBrayer's office?</p>

<p style="text-align: right;">Page 114</p> <p>1 MR. NASRALLAH: Object to the form. 2 The form speaks for itself. 3 MR. VALBUENA: I think she just 4 answered that she believes -- 5 MS. TRIBBLE: I'm sorry. You can 6 object to the form, but I don't want you to 7 instruct her answer. I would appreciate that, 8 please, Mr. Valbuena. 9 MR. VALBUENA: I object to the form, 10 I guess. Asked and answered. 11 Q. (BY MS. TRIBBLE) Does this sheet, 12 again, Ms. Wolven, say Ms. Christy Huiel -- whether 13 she did or not have an abortion on a specific date? 14 If it does, just point me there. 15 MR. NASRALLAH: Object to the form. 16 It speaks for itself. 17 MR. VALBUENA: Same objection. 18 A. I would have to say yes. 19 Q. Tell me what it says. 20 A. Well, on the first page it says -- 21 and I know this from past experience in calling 22 different abortion facilities that they always ask 23 you before your abortion how many children you 24 have. They have down living one, number -- and 25 always ask you how many pregnancies you have had,</p>	<p style="text-align: right;">Page 116</p> <p>1 and then you can explain. 2 A. I can't say for sure, but the 3 procedure codes -- which are circled for an 4 ultrasound, and for the procedure codes 59841 -- I 5 believe that's for a surgical abortion. 6 Q. How do you know that? 7 A. A friend of mine does medical 8 billing -- 9 Q. All right. 10 A. -- for insurance companies. 11 Q. Have you told me any -- everything 12 that you remember, generally, about the 13 conversation that you would have had with Ms. Huiel 14 on October the 11th? 15 A. It's very possible -- because I know 16 I ended up speaking to a lot of patients and I 17 don't know the order of the patients that I 18 called -- but it is very possible that if she was 19 on the second or the third day of my phone calls 20 that I may have asked her if she had any 21 complications from being at Dr. McBrayer's office. 22 Because after calling, I don't know, 23 20 or 30 patients it became very evident that the 24 patients that told me they had surgery at his 25 office -- the majority of them had said they had</p>
<p style="text-align: right;">Page 115</p> <p>1 including abortions. And she has down pregnancies, 2 two. 3 And then there is another spot here 4 where it says nine weeks one day. So I don't know 5 if this was from a different visit that she had 6 gone to because this visit -- this here says six 7 weeks. 8 Q. Can we tell for sure if she had an 9 abortion based on these forms? 10 A. I would say yes. She gave her 11 patient contact information -- it's my 12 understanding that that was her driver, based on 13 information that I know takes place at facilities. 14 Q. When did she have the abortion, 15 based on these documents? 16 A. It looks like -- maybe what happened 17 was maybe she had a medical abortion in June, and 18 then she came back in July for a surgical abortion 19 because it is very common that the medical abortion 20 doesn't work. 21 Q. But you can't say for sure that that 22 is the sequence of events based on the three 23 documents that we have here for Ms. Huiel? 24 A. Well, it's possible -- 25 Q. If you will just answer yes or no,</p>	<p style="text-align: right;">Page 117</p> <p>1 infections that they had to go back to be treated 2 for at his office. 3 So it is very possible that I asked 4 her if she had suffered any sort of damages; and, 5 if she did, she needed to make sure that she let 6 Agent Kirkland know because they were currently 7 investigating unsterile -- the unsterile 8 environment that we became aware of through the 9 employees. 10 Q. That's the Composite State Board 11 investigator? 12 A. Yes. 13 Q. Anything else that you either 14 remember telling her or remember telling generally 15 patients who you called regarding this issue? 16 A. I may have told her that she was, 17 you know, one of many patients that I had already 18 called. And that if she asked me about action that 19 could be taken besides, you know, calling the 20 Medical Board or filing a HIPAA violation -- she 21 may have actually asked me about a lawsuit against 22 him. 23 Q. And what would you have told her? 24 A. I would have told her that it was my 25 opinion, after speaking to many patients, that my</p>

<p style="text-align: right;">Page 118</p> <p>1 belief is that, indeed, that there were many 2 patients that would probably be interested in a 3 lawsuit; that they could go in together to sue 4 Dr. McBrayer. 5 Q. And would you have given her any 6 other information about that? 7 A. No. I didn't know any attorney that 8 would take that case or anything like that. 9 Q. Okay. I don't believe it was 10 Ms. Huiel but I believe Ms. Salaam -- who's going 11 to be the third woman that we talk about in the 12 packet -- testified that you told her that you had 13 found a lawyer who she could call about a possible 14 violation, and provided her with Mr. Nasrallah's 15 telephone number. 16 A. Well, if I told her that, it was 17 that another patient had found that. And I believe 18 there is an email in there that says -- I believe 19 it was Christy -- that says she found Matt. And so 20 I would have probably given -- what was the 21 patient's name. 22 Q. Danielle Salaam. 23 A. Yeah. I probably would have given 24 her that information to contact Matt. And I -- the 25 reason why I wouldn't have that email is because my</p>	<p style="text-align: right;">Page 120</p> <p>1 records to. 2 Q. Sent records to who, Mr. Nasrallah? 3 A. To the patients, because they called 4 me and they asked if they could see what I had. 5 Q. Okay. So I want you to look at the 6 emails between you and Ms. Huiel in October of 2012 7 marked as Exhibit 23. 8 A. Okay. 9 Q. So it looks like -- if you look on 10 page two at the bottom Ms. Huiel emailed you and 11 said, "Hi, Michele. If possible, could you send me 12 a picture of my file from Dr. McBrayer's office. 13 Thanks." 14 A. Okay. 15 Q. So I assume then you must have given 16 her your email address. 17 A. Uh-huh (Nodding head). Probably. 18 Well, I guess -- yeah, I guess she probably -- we 19 may have had two or three conversations, I don't 20 know. But I guess at one point she must have 21 called me from my email address so that she could 22 email me. 23 Q. And then you responded to her -- her 24 email was from around ten AM. You responded to her 25 around eleven AM on page one attaching the four</p>
<p style="text-align: right;">Page 119</p> <p>1 email doesn't save emails I sent. The only emails 2 that -- that I actually get a copy of are ones that 3 I actually copied myself on. 4 Q. From the -- 5 A. That's why I don't recognize her 6 name because -- for some reason, the way my email 7 is set up, it doesn't save sent copies of emails. 8 Q. Your Wolven5855 at Comcast.net? 9 A. Right. 10 Q. So if you referred any of the women 11 whose records you found in the trash on August the 12 14th, 2012, to Mr. Nasrallah, it would have been 13 based on one of the other women saying that, "I 14 have a lawyer, this is his name?" 15 A. Yes. 16 Q. Okay. How many people do you think 17 that you referred to Mr. Nasrallah? 18 A. It was probably just these four, 19 because they would have been the ones that 20 expressed interest and actually -- either called me 21 back -- I think they probably called me back and 22 they said that they wanted copies of their 23 records -- could I email them copies of the 24 records. And I did that. And I believe these four 25 patients must be the only ones that I sent their</p>	<p style="text-align: right;">Page 121</p> <p>1 documents -- four pages of documents? 2 A. Right. 3 Q. And then you have a long email kind 4 of about what had been going on. 5 A. Right. 6 Q. In that first paragraph there when 7 you talk about your -- how you found her documents 8 on a Saturday afternoon in August in the 9 dumpster -- a couple of sentences in you say, "I 10 had been tipped off previously that some evidence 11 is being disposed of in the complex's dumpster." 12 A. Uh-huh (Nodding head). 13 Q. What does that refer to? 14 A. The specific about Leslie saying 15 that there was the ultrasound. 16 Q. Back in 2011? 17 A. It would have been probably -- yeah, 18 2010, 2011. Probably the beginning of 2011. 19 Q. Had anyone else from Dr. McBrayer's 20 office ever tipped you off that some evidence was 21 being disposed of in the complex's dumpster? 22 A. Not me personally. But the reason 23 why we ended up finding the fetal remains is 24 because one of the employees -- I believe it was 25 Chris -- may have motioned to somebody on the</p>

Page 122

1 sidewalk that he was wanting to talk to them or
2 something. I don't really know how it came about.
3 But we got the information from
4 Chris that there were -- it wasn't me personally;
5 it was Margarita -- got the information from Chris
6 that Dr. McBrayer was still doing second trimester
7 abortions and that those fetal remains were in the
8 medical disposal box.
9 Q. That was back in 2007, 2008?
10 A. Yes.
11 Q. Okay. You sort of in this email lay
12 out the timeline of all of the investigations and
13 everything that you have already told me today,
14 basically, about your meetings with the Department
15 of Community Health and the investigation regarding
16 it being an ambulatory surgery center and second
17 trimester abortion.
18 And then at the last paragraph on
19 page two you talk about the Board -- I assume you
20 are talking about the Medical Board -- had gotten
21 back to you on June the 13th.
22 A. Okay.
23 Q. You showed them some evidence,
24 things were dragging -- I'm just paraphrasing. Is
25 that true?

Page 123

1 A. Yeah.
2 Q. And then you spoke with two
3 employees who had recently quit working at the
4 office and decided to go back in August to see if
5 Ms. -- Dr. McBrayer was still dumping records --
6 this would indicate to you whether or not he knew
7 he might be under investigation.
8 A. Okay.
9 Q. Who were the employees?
10 A. I would have to say Rakel maybe. I
11 can't remember all of the employees that quit, but
12 I believe maybe Rakel Roman.
13 Q. Do you know what she did there?
14 A. She was a med tech. I believe that
15 Dr. McBrayer had her doing ultrasounds. She had no
16 licensing at all, which is illegal. Nobody in the
17 State of Georgia is allowed to do ultrasound unless
18 you have a license.
19 He put her, I believe, in charge of
20 doing those ultrasounds. And I believe she also at
21 one point was in charge of cleaning the autoclave
22 machine and told me that she had no training on how
23 to do that.
24 And that Dr. McBrayer was reusing
25 patient equipment that was supposed to be disposed

Page 124

1 after one patient up to a hundred times. And,
2 therefore, not one day went by that they didn't see
3 a patient return that had an infection.
4 Q. Who was the other employee?
5 A. It may have been Alberta. If I --
6 if I look at my notebook I might -- I don't know.
7 I might have some names of employees. I -- there
8 was quite a few employees who came forward, and I
9 wasn't the direct contact with those employees.
10 Q. Was it Lauren Whitaker?
11 A. No. It was another sidewalk
12 counselor who was there outside the clinic every
13 Saturday. So the employees got to know who she
14 was. Her name is Melissa Edwards.
15 So Melissa Edwards and I were
16 working together to try and find them other jobs,
17 because most of them had no experience. And they
18 didn't -- they quit and they had no money coming
19 in. And so we were also trying to get them help --
20 financial help through Ivy Johnson's organization.
21 MR. VALBUENA: Is this an okay place
22 to take a break?
23 MS. TRIBBLE: Let me just follow up
24 on that, but we can take a break. I just don't
25 want to forget --

Page 125

1 MR. VALBUENA: Do that.
2 MS. TRIBBLE: Let me do that so I
3 don't forget.
4 THE WITNESS: Okay.
5 Q. (BY MS. TRIBBLE) When you say that
6 you were speaking with two employees who recently
7 quit and decided to go back to see if he was still
8 dumping records, did you get any information from
9 Alberta or Rakel, or whoever you spoke with, about
10 him dumping records?
11 A. They told me that that was just a
12 standard practice. That we were told to just rip
13 the documents in half, maybe three times, and then
14 throw them away.
15 Q. Now, how would him dumping records
16 to you indicate whether he might know he was under
17 investigation? I just don't understand what that
18 means.
19 A. I figured that certainly if he knew
20 that he was under investigation he wouldn't still
21 be -- they wouldn't still be throwing the documents
22 away; they would have been shredding them.
23 Q. This is my last question, and we
24 will take a break.
25 It sounds like this email was sent

Page 126

1 to someone else and then you just copied it to
2 Ms. Huiel?
3 A. Myself? Where?
4 Q. Because, see, when you start it on
5 page one you tell her you are attaching the
6 documents, and then you say, "Christy Huiel's
7 documents." It sounds like you are talking to
8 someone else -- does that make sense -- instead of
9 saying, "Christy, your documents."
10 A. Yeah. I don't know. Maybe --
11 Q. If you don't know, you can tell me
12 you don't know.
13 A. I don't know.
14 MS. TRIBBLE: We can take a break.
15
16 11:46 AM
17 (Short recess)
18 11:55 AM
19
20 MS. TRIBBLE: We are going back on
21 the record.
22 Mr. Valbuena has to leave at 12:30,
23 so we are going to go until 12:30 and we won't be
24 finished with the deposition; so we are going to
25 reconvene, hopefully, in the next couple of weeks.

Page 127

1 But because we have a motion due
2 with the court, I believe, the second week in
3 December -- we are trying to get it done before
4 then. If that's not possible, what we have all
5 parties have agreed to is that Mr. Court Reporter,
6 David Miller's, office will provide Ms. Wolven with
7 the part of the deposition that we are completed to
8 date to review and sign.
9 Is that agreeable to everyone?
10 MR. NASRALLAH: It is.
11 MS. TRIBBLE: Do you want to go
12 ahead and follow up now on an issue?
13 MR. NASRALLAH: Two questions.
14 MS. TRIBBLE: Okay.
15
16 EXAMINATION BY MR. NASRALLAH:
17 Q. Earlier you had said that the
18 documents that you retrieved from the dumpster that
19 concerned my clients -- the four women that we have
20 been reviewing on Exhibit --
21 A. Twenty-two.
22 Q. -- 22 were torn. And when you say
23 they were torn, can you tell us -- were they torn
24 in half, or were they torn more than in half?
25 A. They were torn at least once, maybe

Page 128

1 -- some of them may have been torn three times.
2 They were not always together. So I
3 had to piece these all back together like a puzzle.
4 It took hours and hours to put all of these
5 documents back together.
6 Q. In any case, were they shredded?
7 A. Absolutely not.
8 Q. And so your memory is they were torn
9 in half or maybe as much as in three places per
10 document?
11 A. Correct.
12 Q. And no more than that?
13 A. I don't think so.
14 Q. And then with regard to --
15 A. Not these.
16 Q. Not those.
17 The Exhibit 23?
18 A. Right.
19 Q. Exhibit 22?
20 A. Right.
21 Q. Finally, with regard to where you
22 found them -- defense counsel had used the word in
23 the dumpster. I want to be just more clear about
24 that.
25 A. Okay.

Page 129

1 Q. When you found the bags at the top,
2 as you described it, were they within the confines
3 of the four metal walls such that you could not see
4 them and had to crawl inside the dumpster and pull
5 it out of those metal walls, or were they visible
6 above the metal walls of the dumpster?
7 A. Yeah. They were visible because the
8 entire dumpster was filled. So they were at the
9 very top of all of the trash that was probably
10 there for maybe a week. And it was overflowing so
11 I could see them. I could see the white -- the red
12 ties.
13 Q. Could you reach them from the
14 ground?
15 A. I believe so. I didn't even have to
16 get in it.
17 Q. Okay.
18 MR. NASRALLAH: I don't have
19 anything else. Did you have anything, Larry?
20 (Pause)
21 Q. (BY MR. NASRALLAH) So when you
22 mentioned that the bags were tied -- I think is
23 your word -- counsel had used the word sealed.
24 When you said they were tied, you said they were
25 tied with a red tie?

Page 130

1 A. Correct.
2 Q. And so -- I buy the bags with the
3 strings that are attached inside the white plastic
4 bags and they pull out and they are red and then
5 you tie that red piece. Is that what you are
6 talking about, or is it a separate twist tie?
7 A. They looked like the exact same bags
8 I buy at Costco with the -- just the kitchen bags
9 that you just tie it up.
10 Q. Has the red pull tie?
11 A. Yes.
12 Q. And that red pull tie is made of
13 plastic, the same kind of material that the bag is
14 made of?
15 A. Yes.
16 Q. When you took the time to look
17 inside the bags, did you untie the red tie?
18 A. Yes. I mean, I just ripped it open.
19 Q. You think you just ripped it open?
20 A. I probably just ripped the tie open
21 because it was tied maybe two times. Is was easier
22 to just rip it.
23 Q. Then, finally, would you describe
24 the bag as an opaque white?
25 A. Yeah. You could see through it.

Page 131

1 Q. It was meaningful to you when you
2 saw pink. Why?
3 What did that mean to you when you
4 saw pink through the bag?
5 A. Because there -- in the past there
6 were pink -- I believe pink and blue forms of a
7 receipt of the patient being there at a visit.
8 Q. Did it mean to you when you saw pink
9 "Oh, there must be patient documents inside this
10 bag?"
11 A. Yeah.
12 MR. NASRALLAH: I don't have
13 anything else. Thank you.
14
15 EXAMINATION BY MS. TRIBBLE (Continued):
16 Q. Why is that?
17 A. Because I believe there may even be
18 some in the 2010 that are pink -- the pink and the
19 yellow and maybe the blue.
20 Q. Were any of the documents in the
21 Exhibit 22 pink?
22 A. I believe so, yeah. I believe these
23 (indicating) receipts -- I think they were pink.
24 Q. There is no way to know that sitting
25 here today?

Page 132

1 A. Yeah, since I don't have the hard
2 copy. There may be some of them -- but I think I
3 gave them all to the FBI, I think.
4 Q. I was going to ask you about the
5 packets that we have marked. They say from July of
6 2012. Who went to the dumpster then?
7 A. That's when I thought that I went.
8 I actually wrote those and cataloged those this
9 week --
10 Q. So --
11 A. -- and put them in the envelope.
12 Q. It should say August of 2012?
13 A. Yes. I believe when I put those
14 together in the envelope to try and make it more
15 organized that it was the last Saturday in July.
16 Q. So everything that says July, 2012,
17 is from the August, 2012, time that you went to the
18 dumpster?
19 A. Correct.
20 Q. Okay. When you told Mr. Nasrallah
21 that you had to rip open the bag, did you actually
22 rip through the plastic part of the bag to open the
23 bag?
24 A. Probably both.
25 Q. Okay. Either ripped the plastic or

Page 133

1 ripped through the tie?
2 A. Yes.
3 Q. Okay. We were talking about Ms.
4 Huiel. Have we gone through all of your
5 communications either by telephone or email, as far
6 as you can recall, with Ms. Huiel?
7 A. I believe so.
8 Q. Okay.
9 A. I don't think I had any contact with
10 her after she said that Matt was looking for an
11 employee that maybe -- there might be an email
12 about her saying that he needed employees that knew
13 about the practice of disposing of the records.
14 Q. You say -- when you say Matt, you
15 are calling Mr. Nasrallah --
16 A. Mr. Nasrallah, yes. I think she
17 sent an email saying that he was looking for an
18 employee.
19 Q. Okay. So that would be in your
20 emails that we have attached as patient emails
21 previously?
22 A. Yeah. So there is an email right
23 here --
24 Q. Exhibit -- what is that?
25 A. Number 3.

Page 134

1 Q. Okay.
2 A. From May 23, 2013. And she says,
3 "Thank you. If you get any leads, please pass them
4 to attorney Matthew N. Thanks."
5 Q. So she was asking you for contact
6 information of employees for her attorney?
7 A. Yes.
8 Q. Back in 2013?
9 A. Yes.
10 Q. Do you think there is any
11 communication beyond that with Ms. Huiel?
12 A. I believe that was probably the last
13 email correspondence that I had with her.
14 Q. If there are any email
15 correspondence, it would be included in Exhibit 3
16 with Ms. Huiel?
17 A. Yeah.
18 Q. On Exhibit 23, Ms. Wolven, there is
19 some emails going back and forth between the 11th
20 of October, 2012, until, I think, the 15th. They
21 are sort of out of order on this printout.
22 But you mention a couple of times,
23 "Things took a twisted turn. Things took a rather
24 dangerous and bazaar turn." Are you talking about
25 the incident where the patient said you had called

Page 135

1 and threatened her?
2 A. Yes.
3 Q. You have already told me about that?
4 A. Yes.
5 Q. Okay. Moving on to the next patient
6 in 22, Coretta Gaither. So her records start on
7 page five, I believe.
8 A. Yes.
9 Q. Are you there?
10 A. Yes.
11 Q. Did you -- do you have an
12 independent memory of calling --
13 MR. VALBUENA: I think you must be
14 missing a page; because when you said that the
15 handwritten page was page four, it's page five.
16 Her page is page six.
17 MS. TRIBBLE: Yes. No, I'm not
18 missing a page. I think they were stuck together.
19 MR. VALBUENA: Okay.
20 Q. (BY MS. TRIBBLE) Page six of Exhibit
21 22 is when we have -- six and seven and eight are
22 from Ms. Gaither.
23 There is no handwritten -- at least
24 as far as I was given the order, there was no
25 handwritten note behind her records.

Page 136

1 A. Right.
2 Q. Do you have an independent memory of
3 when you called her?
4 A. No, except that it had to be in --
5 on the same day, either -- by one or two days that
6 I spoke to Ms. Christy Huiel.
7 Q. All of the calls that you have made
8 to the patients whose records you found on August
9 the 14th, 2012 -- were those around August the 11th
10 -- October the 11th, 2012?
11 A. All the phone calls I made to the
12 patients?
13 Q. Yes.
14 A. Yes. I believe they were all made
15 in the same week. So it looks like the 11th was a
16 Monday. So I think I was calling patients during
17 the week of October the 10th, starting like on
18 Monday.
19 Q. How many patients total did you
20 call? You can approximate if you don't remember
21 specifically.
22 A. Probably 40 to 50.
23 Q. And those records would all be
24 included in the packets that we have marked here?
25 A. No, because I don't have the -- I

Page 137

1 don't have records of -- I didn't keep records of
2 patients that didn't ask me to send them by email.
3 They were confiscated by the FBI.
4 Q. The records of the other patients
5 are in the possession of FBI?
6 A. Right. I don't know what their
7 names were. It's possible that there is a document
8 in one of those -- that I could have called, but I
9 don't know.
10 Q. In the packets?
11 A. Yes.
12 Q. Okay. So is it fair that you don't
13 have an independent memory of your specific
14 conversation with Ms. Gaither? Coretta Gaither.
15 A. No. Her name doesn't even --
16 Q. The answer to my question would be
17 yes; that's fair?
18 A. I don't remember speaking to her.
19 Q. Do you remember if you ever emailed
20 Ms. Gaither? You can look in that exhibit.
21 A. I'm assuming I did, because she has
22 these. So I assume that I did, but I don't have a
23 copy of that email.
24 Q. So what you are saying is the only
25 reason we have copies of these four women's records

<p style="text-align: right;">Page 138</p> <p>1 is because you emailed them to those four women? 2 A. Correct. 3 Q. So you don't think you have a copy 4 of that email to Ms. Gaither? 5 A. I can't get it off my computer. 6 MR. NASRALLAH: I'm sorry. I got my 7 copies from the FBI. So I don't know about that, 8 but I'm just saying there are other reasons we have 9 copies. 10 THE WITNESS: You got my emails from 11 the FBI? 12 MR. NASRALLAH: My copies come from 13 the FBI. 14 MR. MEYER: Of the patient records? 15 MR. NASRALLAH: That's correct. 16 MS. TRIBBLE: I didn't get anything 17 from the FBI. 18 MR. NASRALLAH: I did. 19 MR. MEYER: They are that way. 20 MR. NASRALLAH: I have got a trial 21 showing it. That's where I got my records. 22 Q. (BY MS. TRIBBLE) Let's move -- let 23 me ask you about Ms. Gaither's records. 24 Is there anything on these records 25 that states she had an abortion at Dr. McBrayer's</p>	<p style="text-align: right;">Page 140</p> <p>1 Q. And you are talking about the super 2 bill, this top page, page six of Exhibit 22? 3 A. Mainly the patient registration 4 form, but both of them together. And then this 5 page here -- 6 Q. Show me. 7 A. Page eight. 8 Q. Okay. The insurance page? 9 A. Yes. The insurance -- Medicaid 10 page. I guess this doesn't really give information 11 about what she had done. 12 Q. On page eight? 13 A. Right. 14 Q. The only thing that talks about what 15 she had done is at page six; is that true? 16 A. It looks like this is a billing page 17 receipt. 18 Q. Where it talks about she had a 19 pregnancy test, pap smear, ultrasound, and 20 urinalysis? 21 A. Right. 22 Q. Page seven, the patient 23 registration, it says -- sort of that -- looks like 24 the black magic marker? 25 A. Yes.</p>
<p style="text-align: right;">Page 139</p> <p>1 office? 2 We are talking about pages six, 3 seven, and eight of this Exhibit 22. 4 A. These look like the same papers that 5 Ms. Huiel has, so I would say yes. 6 Q. Based on what information in her 7 records? 8 A. The same thing. It says they did a 9 pregnancy test, a pap smear, an ultrasound. 10 Q. And a urinalysis, I think? 11 A. Yes. Although on here it says she 12 -- it looks like she only paid \$3 cash. So these 13 -- this may actually be a follow-up visit from -- 14 Q. A GYN follow-up visit? 15 A. It looks like there is documents 16 from her being there on August the 6th and July -- 17 maybe July the 6th. 18 Q. No. That's -- I think you are 19 looking at her birthday. 20 A. I am. 21 Q. It says today's date on page six. 22 A. She was there on the 6th. I can 23 only say that this just looks like the same 24 paperwork that they used from what I have seen for 25 when patients comes in to have an abortion.</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. "8/6 GYN \$3 cash co-pay?" 2 A. Yeah. I believe that's because she 3 maybe was a Medicaid patient so she only paid \$3. 4 I don't know. 5 But the -- the emergency contact 6 information, I believe, is driver information from 7 when you have an abortion you have to have somebody 8 waiting that they can call. 9 Q. Have you ever -- when you have gone 10 to the doctor have you ever filled out emergency 11 contact information -- 12 A. Yes. 13 Q. -- like for your primary care? 14 A. Yes. On a separate page usually. 15 Q. Okay. So have we talked about all 16 of the information that you have about -- that you 17 can remember regarding your communications with Ms. 18 Gaither, sitting here today? 19 A. Yeah. I don't -- I don't remember 20 the actual phone call or communication with her. 21 Q. Okay. So moving on to the third 22 patient, which are pages nine, 10, 11, and 12 of 23 the packet. It's Ms. Danielle Salaam. Are you 24 there? 25 A. Yeah.</p>

<p style="text-align: right;">Page 142</p> <p>1 Q. Okay. Again, do you have a specific 2 recollection of your communication -- telephone 3 calls or any sort of communication with Ms. Salaam? 4 A. No. 5 Q. Okay. On page 13 of Exhibit 22 6 there is handwritten records. Keep going. 7 A. Okay. 8 Q. I'm going to number those pages 9 since we have been talking about it that way. 10 Is this your handwriting? 11 A. Yes. 12 Q. What does it say? 13 A. "Spoke to her. Thankful. And she 14 said God bless you." 15 Q. Okay. Does that refresh your memory 16 of your conversation with her? 17 A. Somewhat. But, you know, I spoke to 18 so many patients and so many of them were thankful 19 that it doesn't make me know that that was her that 20 I spoke to. 21 Q. Okay. Do you have a specific memory 22 of when you talked to Ms. Salaam other than it 23 being the week of October the 10th? 24 A. No. 25 Q. Do you know how many times you spoke</p>	<p style="text-align: right;">Page 144</p> <p>1 with Ms. Salaam? 2 A. No. I -- I don't have any records 3 of having email correspondence with her. 4 Q. Okay. And then my same question 5 that I asked you about the other records. Is there 6 anything in the records that indicate Ms. Salaam 7 had the abortion on the date of the records, which 8 is August the 7th, 2012, or any other prior time? 9 A. They are the same patient intake 10 forms that would lead me to believe that this is 11 what she gave them the day she had the abortion. 12 Q. You think she had the abortion on 13 August the 7th, 2012? 14 A. Yeah. 15 Q. According to the front -- the page 16 nine? 17 A. Yeah. The receipt. 18 Q. The super bill. 19 She had the Depo-Provera 20 contraceptive, pregnancy test, pap smear, and 21 urinalysis? 22 A. Right. I see that. 23 Q. Okay. 24 A. I can't read this -- the handwriting 25 and the diagnosis.</p>
<p style="text-align: right;">Page 143</p> <p>1 with her? 2 A. I -- I assume it was once or twice. 3 Q. Okay. Ms. Salaam testified when I 4 talked to her -- like I'm talking to you -- that 5 when she asked you why you were calling you said 6 that you wanted to take Dr. McBrayer down and had 7 been trying to do so for a long time. 8 A. Uh-huh (Nodding head). 9 Q. Would that have been something that 10 you would have said? 11 A. Uh-huh (Nodding head). 12 Q. Is that yes? 13 A. Yes. 14 Q. Okay. Thank you. 15 And that she was the woman who told 16 me -- one of plaintiffs -- that you had found a 17 lawyer who she could call about a possible lawsuit. 18 And gave -- you gave her Mr. Nasrallah's telephone 19 number. Do you remember that? 20 A. I probably did. But I didn't find 21 Mr. Nasrallah. I believe Ms. Huiel did. 22 Q. Okay. And do you know if you -- 23 other than assuming that you emailed her a copy of 24 the records -- because we have them here today -- 25 do you know if you had any email correspondence</p>	<p style="text-align: right;">Page 145</p> <p>1 Q. All right. Moving on to the last 2 patient, which is Rachell Graham. That's on pages 3 14, 15, 16, and 17 of Exhibit 22. 4 A. Okay. 5 Q. The last page of the exhibit is 6 another handwritten page. Is that your 7 handwriting? 8 A. Yeah. 9 Q. What does it say on this page? 10 A. It looks like it says, "Left message 11 10/11. One Rachell Graham at Gmail something dot 12 com. Lawsuit, 800." I don't know what Boykin -- 13 it looks like it says Boykin. 14 Q. Does that mean anything to you? 15 A. No. 16 Q. Okay. So according to this sheet, 17 does this mean that you would have left her a 18 message on October the 11th? 19 A. I assume so. 20 Q. I assume then to know what her email 21 address is you would have spoken to her? 22 A. Yes. 23 Q. And then based on the fact that we 24 have a copy of her records, you assume that you 25 emailed her a copy of these records?</p>

Page 146

1 A. Yes.
2 Q. In the email that you sent to these
3 four women would you have included handwritten
4 notes too?
5 A. I don't know.
6 Q. Okay.
7 A. I -- if it was scanned -- because
8 that's what I would have done, I would have scanned
9 it. I don't know.
10 Q. Okay. Do you have an independent
11 memory of your conversation with Ms. Graham?
12 A. Her -- the initial conversation, not
13 really. Actually, I sort of recall that she wasn't
14 even maybe there for an abortion. Maybe I learned
15 that down the road. I don't know.
16 Q. From who?
17 A. I think she told me. But maybe --
18 maybe she did. The last time I talked to Rachell
19 was probably in 2013. So I can't remember.
20 I think she did have an abortion,
21 because I think I remember trying to get her some
22 counseling help to get over it. I don't know if it
23 was this visit.
24 Q. The visit on pages 14 through 16?
25 A. Correct.

Page 147

1 Q. According to that first page, she
2 had the Depo-Provera shot, pregnancy test, and
3 urinalysis?
4 A. Uh-huh (Nodding head).
5 Q. Is that true?
6 A. Yeah.
7 Q. Okay. Why were you talking to her
8 in 2013?
9 A. She had -- she had spoken to a
10 friend of mine named Katherine Davis about her
11 abortion, I believe -- because she had had an
12 abortion and Katherine Davis also had an abortion.
13 And she and her -- I put them together.
14 And it was Katherine's idea to
15 invite her to an event that we had at the capitol
16 called Women Taking Back Life. And so we invited
17 her to that. And it was -- we were supposed to
18 have a -- walking visits with Governor Deal.
19 And there was about 200 or 300 women
20 of all different races that showed up. Governor
21 Deal wouldn't even come into the office to speak to
22 anybody. Rachell was there.
23 Q. How did Rachell get in contact with
24 your friend, Katherine?
25 A. I think I did a conference call with

Page 148

1 her.
2 Q. How did that happen?
3 A. I just mentioned to Katherine that
4 Rachell was one of the people that was, you know,
5 suing Dr. McBrayer. And she has been very
6 thankful, and she was actually the person who had
7 me tape record the phone call of Angela Buckner
8 telling her that I broke into the office and stole
9 the records.
10 Q. So how many times do you think that
11 you have talked to Rachell Graham?
12 A. On the phone, maybe -- maybe five
13 times on the phone.
14 Q. Why was she someone who you
15 continued communicating with?
16 A. You know what, I don't -- she just
17 -- she was a single mom, and she just sort of
18 reached out to me. She emailed me just wishing me
19 Happy -- a Merry Christmas, Happy New Year sort of
20 thing back and forth. You know, do you know
21 anything what is going on with the case. And I
22 don't think I have had communication with her in
23 maybe two or three years.
24 Q. Okay. Did you know that she was in
25 jail?

Page 149

1 A. No, not until today.
2 Q. All right. Do you know why she is
3 in jail?
4 A. No.
5 Q. Who told you she was in jail; Mr.
6 Nasrallah?
7 A. I just heard it from you two.
8 Q. Okay. The notes that you have that
9 you have made -- can we get a copy of those today?
10 A. Oh, my hand --
11 Q. Yeah.
12 A. My notebook?
13 Q. Yeah. If you can tear them out and
14 we can get them back to you.
15 A. I can.
16 MR. VALBUENA: That's an interesting
17 mix of what is in there.
18 MS. TRIBBLE: We won't mark the
19 whole notebook.
20 Q. (BY MS. TRIBBLE) Did you make any
21 notes on the computer?
22 A. No. These were notes that I took
23 from going over -- oh, here. There is one more.
24 Q. Going over what you brought me
25 today?

<p style="text-align: right;">Page 150</p> <p>1 A. Going over what I -- and also after 2 speaking to Margarita on the phone. 3 Q. Okay. About your deposition? 4 A. About -- really, when we first 5 met -- because I couldn't find any emails on my 6 computer that went further than 2009 or 2010. 7 (WHEREUPON, a document was marked as 8 Defendant's Exhibit 24 and is attached to the 9 original transcript.) 10 A. I was pretty sure I knew her before 11 then. I wanted to clarify when we first met. 12 Q. Okay. I want to confirm that you 13 did not ever publish these records in Exhibit 22 on 14 the Internet or in a newspaper or anything like 15 that? 16 A. Correct. 17 Q. You never sent these records to the 18 general public in any way? 19 A. Correct. 20 Q. Okay. And it sounds like you 21 communicated about these records to the patients 22 themselves, and then you gave them to investigative 23 officers in the FBI? 24 A. Yes. 25 Q. Okay. You have never on any of your</p>	<p style="text-align: right;">Page 152</p> <p>1 that you have had? 2 A. Not that I have. That the organizer 3 who -- so whoever was in charge of registering the 4 site with the National 40 Days For Life campaign -- 5 they had like a working schedule. And people could 6 actually go on line and they could sign up for a 7 block of time. 8 Q. Okay. 9 A. I don't have access to that. 10 Q. I'm just going to run through a 11 couple of things and then -- I'm sorry -- we will 12 have to come back. 13 A. Okay. 14 Q. Would you agree, Ms. Wolven, that 15 since you have learned about Alpha OB/GYN -- the 16 Governor's Ridge practice -- that it has been your 17 mission to close the doors of that practice? 18 A. Ever since I found out in 1998 that 19 he was illegally doing second trimester felony 20 abortions and should have been in jail, yes. 21 Q. And then the same goes with the 22 Alpha Gynecology and Consulting that is owned by -- 23 was owned by Sheila Bynum and Dr. McBrayer worked 24 there. It was also your mission to shut that 25 practice down?</p>
<p style="text-align: right;">Page 151</p> <p>1 Facebook pages or blogs ever mentioned these people 2 by name? 3 A. No. 4 Q. Okay. And these people, I mean the 5 four plaintiffs in this case; is that true? 6 A. That's true. 7 Q. Okay. You have never posted copies 8 of the records that you have taped together that we 9 have marked as Exhibit 22 on any of your Facebook 10 pages or your blog? 11 A. No. 12 Q. Okay. You have never talked to the 13 media about these patient's records? 14 A. No. 15 Q. Okay. You mentioned there was a 16 protesting schedule for Dr. McBrayer's office. 17 A. Yeah. They had -- there has been 18 many, many different 40 Days For Life campaigns 19 where they have 40 days straight of prayer and 20 presence. And they try to schedule them usually 21 the hours that he would have been working, so 22 probably between six AM and three PM. 23 Q. For 40 days straight? 24 A. Yes. 25 Q. So is that like a written schedule</p>	<p style="text-align: right;">Page 153</p> <p>1 A. To shut it down, absolutely. 2 Q. Would you agree that it's been your 3 mission to stop Dr. McBrayer from performing 4 abortions in Cobb County? 5 A. Yes. 6 Q. And then I think that the Alpha 7 Gynecology and Consulting -- Ms. Bynum's 8 practice -- you held a cleansing ceremony there 9 after it closed? 10 A. Yes. 11 Q. Was that something that you helped 12 organize? 13 A. Yeah. 14 Q. And did you do the same when Dr. 15 McBrayer's Alpha OB/GYN closed? 16 A. No. 17 Q. Is there a reason why? 18 A. I didn't find out about it -- the 19 way it was evolving -- it didn't really seem like 20 it was necessarily a victory because we heard 21 information that he was moonlighting at Summit late 22 term abortion facility on Piedmont Road. 23 Q. So even though the physical Alpha 24 OB/GYN office had closed, he was still performing 25 abortions?</p>

Page 154

1 A. Correct.
2 Q. The web site that you have
3 maintained to protest abortions includes your
4 personal Facebook page, just Michele Wolven, yes?
5 A. Yes.
6 Q. And then I think it's called -- you
7 tell me. I didn't write it down -- the Cobb
8 County --
9 A. Oh.
10 Q. I may have it here. I have it
11 because I printed it out. Keep West Cobb Abortion
12 Free?
13 A. Yes.
14 Q. Do you have any other Facebook pages
15 where you discuss your pro-life opinions?
16 A. Yeah. I believe it's a Facebook
17 McBrayer Blogger Facebook page.
18 Q. McBrayer Blogger?
19 A. I believe so. It has links to the
20 blog.
21 Q. To McBrayer Blog Watch?
22 A. Yes.
23 Q. Any other Facebook pages?
24 A. No, I don't think so.
25 Q. What about other social media like

Page 155

1 Instagram?
2 A. No, I don't go on those.
3 Q. So Facebook is your only social
4 media where you talk about pro-life --
5 A. Yes.
6 Q. -- topics?
7 On your web site -- or your blog is
8 Dr. Daniel McBrayer Watch Blog?
9 A. Yes.
10 Q. That's a Word Press Blog?
11 A. Yes.
12 Q. It looks like you haven't posted on
13 there in awhile.
14 A. Yes.
15 Q. You started that in -- when you
16 found out Dr. McBrayer was doing late term
17 abortions?
18 A. I believe so.
19 Q. Okay. Do you have any other web
20 sites or blogs where you discuss pro-life opinions
21 or anti-abortion opinions or any doctors who
22 perform abortions in the Metro Atlanta area?
23 A. I don't think so.
24 Q. I found another blog -- web site, it
25 was WomenTakingBackChoice.com?

Page 156

1 A. Oh, yeah.
2 Q. Is that your web site too?
3 A. Katherine Davis had a web developer
4 do it. I worked on that project with her. That's
5 the -- that was the Georgia Capitol event that I
6 mentioned.
7 Q. When was that event, in 2013?
8 A. I think so. It might have been
9 2014. I think it was 2013.
10 Q. Okay. Any other web sites?
11 A. There was a Facebook page, I believe
12 -- I'm not sure what the name of it is, but it is
13 in -- an Arkansas -- it's Little Rock Family
14 Planning.
15 Q. Why are you involved in the Arkansas
16 abortion clinic?
17 A. I have been involved in a lot of
18 different states helping shut down clinics in
19 Illinois -- quite a few in Illinois and North
20 Carolina.
21 There is only one abortion clinic in
22 the whole state of Arkansas. So this particular
23 person and I got together and we -- I helped her.
24 She is at the clinic all the time there, and I have
25 helped her with postings on that Facebook page.

Page 157

1 Q. Okay. Eagle Watch -- what is that?
2 A. That is my organization that I
3 obtain open records through. And that is the --
4 that's, basically, you know, what I do all of my
5 research for is to uncover any sort of dangerous
6 situations at abortion clinics.
7 Q. Is that an LLC or a nonprofit?
8 A. It's not even registered, I don't
9 think.
10 Q. Do you have a web site?
11 A. No.
12 Q. Are you the only person who is
13 involved in Eagle Watch?
14 A. Other people have helped me get open
15 records like -- because in other states only the
16 people that live in those states are allowed to get
17 them like in Arkansas.
18 I have helped -- I will write the
19 open record request, and then they will submit it.
20 Or I will write a complaint based on the patient,
21 and then I can submit a complaint; but I can't get
22 records in some states.
23 Q. So you are saying when you ask for
24 records you use Eagle Watch as the name instead of
25 your own?

Page 158	Page 160
<p>1 A. I use both. 2 Q. Okay. 3 MS. TRIBBLE: I probably have 4 another like hour and a half of questions. So we 5 will just have to reconvene. I apologize. 6 MR. NASRALLAH: The documents. 7 MS. TRIBBLE: We have marked all of 8 these documents. 9 MR. NASRALLAH: Are we still on the 10 record? 11 MS. TRIBBLE: Yes. I know you want 12 these. 13 THE WITNESS: Yeah. 14 MR. VALBUENA: I can have my -- 15 THE WITNESS: Do you want me to just 16 leave them here? 17 MR. VALBUENA: I will have my 18 paralegal make copies of these with the copy of the 19 outside of the envelope and email all of that 20 Monday or Tuesday. 21 MS. TRIBBLE: You can email it to 22 David, the court reporter. 23 MR. VALBUENA: You want these back? 24 THE WITNESS: Yeah. 25 MR. NASRALLAH: We will let David be</p>	<p>1 just some -- I mean, I don't -- there is stuff in 2 there you don't need. 3 MS. TRIBBLE: That's okay. They 4 will make copies of whatever they can. 5 MR. NASRALLAH: It's your decision. 6 MR. VALBUENA: I just didn't want 7 them -- if you are more comfortable with documents 8 staying here, Jennifer making the copies, then 9 that's what we will do. If you would rather -- if 10 you are okay with the court reporter -- 11 THE WITNESS: Actually, I'm okay 12 with the court reporter taking this stuff 13 (Indicating). It was the other stuff that -- 14 MS. TRIBBLE: Which we don't need. 15 MR. VALBUENA: Okay. 16 MS. TRIBBLE: So we have changed our 17 mind. Everything is going with the court reporter. 18 David will get your information and he will -- he 19 will send it back to your lawyer -- the originals. 20 And then we will pick a date when we are off the 21 record, if we can. If not, we will arrange a date 22 with your lawyer in the next couple of weeks to 23 finish up. 24 THE WITNESS: Okay. 25 MR. NASRALLAH: By agreement the</p>
Page 159	Page 161
<p>1 the hub. 2 What about this thick phone record? 3 That's a heck of a pile. 4 MS. TRIBBLE: It's okay. I gave it 5 to him. 6 What is not going with the court 7 reporter is Exhibit 24, Exhibit 5, 6, 7, 8, 9, 4, 8 and 10. 9 MR. NASRALLAH: Everything else is 10 going with the court reporter today? 11 MS. TRIBBLE: Yes. 12 MR. NASRALLAH: Okay. 13 MS. TRIBBLE: The other option is 14 that the court reporter can do it and then send you 15 back the originals, if you would rather your office 16 not do it. If you want it to stay with his office, 17 it's just up to you. 18 MR. VALBUENA: That's up to you, 19 Michelle. I thought you didn't want them going 20 going. 21 MS. TRIBBLE: Whatever is fine with 22 me. 23 MR. VALBUENA: It's all paper, isn't 24 it. 25 THE WITNESS: It's all paper; it's</p>	<p>1 deposition is adjourned and remaining open; 2 however, a transcript will be provided from this 3 first part to the witness giving her an opportunity 4 to fill out a jurat and make changes as necessary. 5 Thank you. 6 MS. TRIBBLE: Okay. 7 8 9 10 (Deposition adjourned at 12:34 PM) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>


Page 162

1 REPORTER DISCLOSURES
2 The following representations and
3 disclosures are made in compliance with Georgia
4 Law, more specifically:
5 Article 10(B) of the Rules and
6 Regulations of the Board of Court Reporting
7 (disclosure forms)
8 OCGA section 9-11-28(c) (disqualification
9 of reporter for financial interest)
10 OCGA sections 15-14-37 (a) and (b)
11 (prohibitions against contracts except on case-by-
12 case basis)
13 I am a certified court reporter in the
14 State of Georgia.
15 I am a subcontractor for Tiffany Alley
16 Veritext
17 I have been assigned to make a complete
18 and accurate record of these proceedings.
19 I have no relationship of interest in the
20 matter on which I am about to report which would
21 disqualify me from making a verbatim record or
22 maintaining my obligation of impartiality in
23 compliance with the Code of Professional Ethics.
24 I have no direct contract with any party
25 in this action and my compensation is determined

Page 163

1 solely by the terms of my subcontract agreement.
2 FIRM DISCLOSURES
3 Tiffany Alley veritext was
4 contacted to provide reporting services by the
5 noticing or taking attorney in this matter.
6 There is no agreement in place that is
7 prohibited by OCGA 15-14-37 (a) and (b). Any case-
8 specific discounts are automatically applied to all
9 parties, at such time as any party receives a
10 discount.
11 Transcripts: The transcript of this
12 proceeding as produced will be a true, correct, and
13 complete record of the colloquies, questions and
14 answers as submitted by the certified court
15 reporter.
16 Exhibits: No changes will be made to the
17 exhibits as submitted by the reporter, attorneys or
18 witnesses.
19 Password-Protected Access: Transcripts
20 and exhibits relating to this proceeding will be
21 uploaded to a password-protected repository, to
22 which all ordering parties will have access.
23
24
25

Page 164

1 C E R T I F I C A T E
2 I hereby certify that the above and
3 foregoing deposition was taken down, as stated in
4 the caption, and the colloquies, the questions and
5 answers thereto were transcribed by means of
6 computer-aided transcription, that the transcript
7 is a true and correct record of the evidence given
8 upon said proceeding me.
9 I have no relationship of interest in
10 this matter which would disqualify me from
11 maintaining my obligation of impartiality in
12 compliance with the Code of Professional Ethics.
13 I have no direct contract with any party
14 in this action and my compensation is based solely
15 on the terms of my subcontractor agreement.
16 Nothing in the arrangements made for this
17 proceeding impacts my absolute commitment to serve
18 all parties as an impartial officer of the court.
19
20
21 
22 DAVID L. MILLER, LCR, CCR, RPR, RMR
23 Alabama License #347
24 Georgia License #6322-0018-0740-9152
25 Tennessee License #683

Page 165

1 TIFFANY ALLEY, A VERITEXT COMPANY
2 FIRM CERTIFICATE AND DISCLOSURE
3
4 Tiffany Alley Veritext represents that the
5 foregoing transcript as produced by our Production
6 Coordinators, Georgia Certified Notaries, is a true,
7 correct and complete transcript of the colloquies,
8 questions and answers as submitted by the certified
9 court reporter in this case. Tiffany Alley Veritext
10 further represents that the attached exhibits, if any,
11 are a true, correct and complete copy as submitted by
12 the certified reporter, attorneys or witness in this case;
13 and that the exhibits were handled and produced exclusively
14 through our Production Coordinators, Georgia Certified
15 Notaries. Copies of notarized production certificates
16 related to this proceeding are available upon request to
17 litsup-ga@veritext.com.
18
19 Tiffany Alley Veritext is not taking this deposition
20 under any relationship that is prohibited by
21 OCGA 15-14-37(a)and(b). Case-specific discounts are
22 automatically applied to all parties, at such time as any
23 party receives a discount. Ancillary services such as
24 calendar and financial reports are available to all
25 parties upon request.

Page 166

1 TO: Martin Valbuena
 2 Re: Signature of Deponent Michelle Wolven
 3 Date Errata due back at our offices: 12/29/2016
 4
 5 Greetings:
 6 The deposition of the listed deponent has been transcribed
 and is ready for reading and signing.
 7
 8 As Georgia law provides thirty days for this process to be
 completed, please have the deponent contact our office to
 9 make arrangements. Please reply to this email or use the
 contact information below.
 10
 11 If we have not heard from the deponent within this period,
 the deposition may be filed with the court without
 12 signature.
 13
 14
 15
 16 Please send completed Errata to:
 17 Tiffany Alley Veritext
 18 1075 Peachtree Street NE, #3625
 19 Atlanta, GA 30309
 20 (770) 343-9696
 21
 22
 23
 24
 25

Page 168

1 Page ____ Line ____ Change _____
 2 _____
 3 Reason for change _____
 4 Page ____ Line ____ Change _____
 5 _____
 6 Reason for change _____
 7 Page ____ Line ____ Change _____
 8 _____
 9 Reason for change _____
 10 Page ____ Line ____ Change _____
 11 _____
 12 Reason for change _____
 13 Page ____ Line ____ Change _____
 14 _____
 15 Reason for change _____
 16 Page ____ Line ____ Change _____
 17 _____
 18 Reason for change _____
 19 _____
 20 _____
 DEPONENT'S SIGNATURE
 21
 Sworn to and subscribed before me this ____ day of
 22 _____, _____.
 23 _____
 24 NOTARY PUBLIC
 25 My Commission Expires: _____

Page 167

1 ERRATA
 2 I, the undersigned, do hereby certify that I have read the
 transcript of my testimony, and that
 3
 4 ___ There are no changes noted.
 5 ___ The following changes are noted:
 6
 Pursuant to Rule 30(7)(e) of the Federal Rules of Civil
 7 Procedure and/or OCGA 9-11-30(e), any changes in form or
 substance which you desire to make to your testimony shall
 8 be entered upon the deposition with a statement of the
 reasons given for making them. To assist you in making any
 9 such corrections, please use the form below. If additional
 pages are necessary, please furnish same and attach.
 10
 11 Page ____ Line ____ Change _____
 12 _____
 13 Reason for change _____
 14 Page ____ Line ____ Change _____
 15 _____
 16 Reason for change _____
 17 Page ____ Line ____ Change _____
 18 _____
 19 Reason for change _____
 20 Page ____ Line ____ Change _____
 21 _____
 22 Reason for change _____
 23 Page ____ Line ____ Change _____
 24 _____
 25 Reason for change _____

&	12:34 161:10	39:23 40:3,8	134:20 136:9,10
& 4:6,12	12th 46:7,20	1966 12:15	144:8,13
1	13 2:23 7:13 8:13	1990 16:2	2013 88:7 89:25
1 2:11 7:1 8:1 24:7	29:13 30:13 33:23	1998 152:18	90:1 134:2,8
24:11 26:20 29:1	34:2 42:2 142:5	1999 15:20 30:21	146:19 147:8
30:1 33:14 34:15	131 2:4	38:12,16	156:7,9
10 2:20 7:10 8:10	13th 32:11 122:21	2	2014 15:15 41:16
23:2 29:10 30:5,9	14 2:24 7:14 8:14	2 2:12 7:2 8:2	109:17 110:5
30:10 38:3 52:1	29:14 30:14 34:6	26:11,13 29:2	156:9
56:23 64:14 69:5	34:12 42:14 145:3	30:2	2015 109:17 110:5
141:22 159:8	146:24	20 3:7 7:20 8:20	2016 1:18 6:7
162:5	14-1-1246-51 1:6	29:20 30:20 42:24	205 4:8
10/11 106:14	14th 58:3 70:23,24	43:1 116:23	206 12:21
145:11	80:10 92:4,24	200 147:19	21 3:8 7:21 8:21
1075 166:18	101:3 119:12	2000 85:9	14:14 29:21 30:21
10:01 43:22	136:9	2007 47:23 73:14	43:13,15
10:05 43:24	15 2:25 7:15 8:15	74:15 122:9	22 3:9 7:22 8:22
10:30 68:17 75:13	29:15 30:15 35:4	2008 73:14 74:16	29:22 30:22 90:25
10th 136:17	35:15 98:18 145:3	122:9	91:2 92:2 97:10
142:23	15-14-37 162:10	2009 150:6	97:25 106:6,11
11 2:21 7:11 8:11	163:7 165:12	2010 30:5 43:7	109:3 112:1
29:11 30:11,15,17	150 3:11	71:10,21,21 72:3	127:22 128:19
39:16 141:22	15th 54:23 134:20	74:6 82:20 110:11	131:21 135:6,21
113 1:21 5:7 6:5	16 3:3 7:16 8:16	121:18 131:18	139:3 140:2 142:5
11:30 56:14	29:16 30:16 35:18	150:6	145:3 150:13
11:46 126:16	35:20 145:3	2011 43:10 82:20	151:9
11:55 126:18	146:24	83:17 121:16,18	23 3:10 7:23 8:23
11th 98:24 99:9	162 2:6	121:18	13:21 14:17 16:14
105:22 116:14	164 2:7	2012 28:12,22 29:3	29:23 30:23 98:25
134:19 136:9,10	17 3:4 7:17 8:17	29:13,20 30:3	99:4 120:7 128:17
136:15 145:18	29:17 30:17 39:22	32:6,7,8,11 35:17	134:2,18
12 2:22 7:12 8:12	40:3,8 145:3	42:6 44:4,12 46:8	24 2:11 3:11 7:24
29:12 30:12 31:12	18 1:18 3:5 6:7	47:17 50:6 52:15	8:24 14:5 29:24
31:18 40:18 65:17	7:18 8:18 13:9	71:16,20 74:5,6	30:24 150:8 159:7
66:14 141:22	29:18 30:18 39:23	75:22 76:7,8,13	25 7:25 8:25 14:5
12/29/2016 166:3	40:3,8	77:3,14 78:4	29:25 30:25
127 2:5	1827 4:13	80:11 83:24 86:7	26 2:12 14:3
12:00 56:14	18th 44:12 67:15	86:18 92:4,24	27 2:13 14:3
12:30 126:22,23	68:12 70:20	101:3 112:25	28 2:14,15
	19 3:6 7:19 8:19	119:12 120:6	29 2:16,17,18
	22:11 29:19 30:19	132:6,12,16,17	

29th 59:9 2nd 12:15	59841 116:4 5:30 54:20 5th 59:6,6	950 4:22 98 40:13 99 3:10 15:21 40:13	102:2 115:1 122:7 152:20 153:4,25 154:3 155:17,22
3	6	990 4:7 999 4:21 9:15 1:19 6:7 9th 112:23	absolute 164:17 absolutely 84:3 92:9 128:7 153:1 access 152:9 163:19,22
3 2:13 7:3 8:3 27:9 27:11 29:3 30:3 133:25 134:15 139:12 141:1,3 30 2:19,20,21 85:11 89:23 116:23 167:6 300 147:19 30062 4:9 301 4:14 30132 5:9 12:22 15:17 30309 4:23 166:19 30339 4:15 31 2:22 31st 44:18,20 45:4 34 2:23,24 343-9696 166:20 347 164:23 35 2:25 3:3 113:15 3625 166:18 3:30 58:23	6 2:16 4:14 7:6 8:6 29:5,6 30:6 159:7 6322-0018-0740... 164:24 683 164:25 6th 139:16,17,22	a	accident 22:12 accord 11:18 account 23:17 accurate 44:13 162:18 accusing 57:5 act 6:15 acting 6:2 27:3,4 action 1:5 68:24 69:1 100:6 107:16 117:18 162:25 164:14 actions 102:17 activist 50:21 activists 74:10 83:6 84:18 86:20 activity 100:4 actual 23:6 76:18 141:20 actuarial 23:16 added 63:13 additional 65:16 167:9 address 12:20 13:1 15:14,19,24 61:14,15 63:19 120:16,21 145:21 adjourned 161:1 161:10 administrator 41:9 admitted 105:11
4	7	a.m. 1:19 6:7 ab 113:1 ability 8:18 able 10:7 64:18 70:6 73:25 94:14 94:21 111:1 abney 17:8,9 aborted 82:24 abortion 20:10 30:23 31:1,11 33:5 35:8 61:2,17 62:14 72:20,21 75:9 82:22 84:18 87:19 101:24,25 107:8 108:11,16 108:17 109:5,9,23 110:8,23 112:4,18 113:9,13,15,18,20 113:23,25 114:13 114:22,23 115:9 115:14,17,18,19 116:5 122:17 138:25 139:25 141:7 144:7,11,12 146:14,20 147:11 147:12,12 153:22 154:11 155:21 156:16,21 157:6 abortions 33:5 48:3 69:2 72:18 78:24 79:15 85:24 86:9 89:11,16	
4 2:14 7:4 8:4 28:18 29:4 30:4 159:7 40 3:4,5,6 79:17 136:22 151:18,19 151:23 152:4 43 3:7,8 450 113:12	7 2:4,17 7:7 8:7 29:7,11 30:7 159:7 167:6 71 15:17 770 166:20 7th 144:8,13		
4	8		
4 2:14 7:4 8:4 28:18 29:4 30:4 159:7 40 3:4,5,6 79:17 136:22 151:18,19 151:23 152:4 43 3:7,8 450 113:12	8 2:18 7:8 8:8 29:8 29:17 30:8 159:7 8.b 5:23 8/6 141:1 800 145:12 80s 87:21 83 21:4 84 21:4 8th 54:23		
5	9		
5 2:15 7:5 8:5 28:20,24 29:5 30:5 159:7 50 110:2 136:22	9 2:19 7:9 8:9 29:9 29:23 30:2,9 112:24 159:7 9-11-28 162:8 9-11-30 167:7 90s 38:9 39:13 87:21 88:4 90:3 91 3:9 92 56:5 94 14:16		

adult 13:25 adults 13:14 advanced 19:16 advice 11:18 32:25 afternoon 58:23 63:24 69:12 97:1 121:8 age 13:9 agent 49:19 52:10 55:22,25 56:4,16 57:17 59:11 99:22 117:6 ago 9:10 23:17 42:7 agree 6:24 152:14 153:2 agreeable 7:2 127:9 agreed 127:5 agreement 6:13 160:25 163:1,6 164:15 ahead 100:15 127:12 aided 164:6 al 1:12 alabama 87:13 164:23 alberta 124:5 125:9 allegations 49:13 alley 162:15 163:3 165:1,4,6,11 166:17 allgood 17:24 allowed 6:14,17 59:3 123:17 157:16 alpha 2:21 27:17 33:16 38:6,15 39:17 40:20 41:18	42:2,16 152:15,22 153:6,15,23 altimari 15:8,11 amanda 59:19 ambulatory 78:20 78:23 79:5 80:4 122:16 amended 24:7,8 american 18:24 amusement 22:12 23:10 ancillary 165:13 andrew 13:21,22 14:8,15,16,18 16:11,13 17:12 19:10,12 andy 49:19 52:10 55:22,25 56:4,16 59:11 anesthesia 111:1 ange 14:25 angela 36:10,12,19 37:14 52:4,12,24 54:24 55:11 56:2 64:1,9 66:22,22 67:9 75:3 148:7 angry 56:18 answer 7:19 46:22 55:20 109:7 114:7 115:25 137:16 answered 62:22 114:4,10 answers 8:19 163:14 164:5 165:6 anti 20:10 62:14 84:18 155:21 anybody 63:25 90:14 103:24 147:22	anymore 90:13 anyway 57:23 aon 23:22 apart 92:1 apologize 22:24 158:5 applied 103:14 163:8 165:13 appreciate 24:22 114:7 approaching 100:9 approximate 136:20 approximately 6:6 area 39:19 42:4 86:9,16 93:7 94:9 95:2 155:22 arkansas 2:25 34:21 35:10 156:13,15,22 157:17 arms 72:24 armstrong 16:16 19:4 arrange 160:21 arrangements 164:16 166:9 arrested 73:3 90:16,22 arson 46:5 57:6 62:10 article 5:23 162:5 ashleigh 14:9 ashley 16:16 19:3 asked 9:11 53:17 56:25 57:22 62:23 65:25 114:10 116:20 117:3,18 117:21 120:4 143:5 144:5	asking 44:5 60:9 82:17 105:23 106:22 134:5 assigned 162:17 assist 167:8 associate 21:15 assume 120:15 122:19 137:22 143:2 145:19,20 145:24 assumed 53:7 80:22 81:1 assuming 137:21 143:23 assumption 64:7 66:21 77:23 atlanta 4:15,23 86:3,4,9,15 155:22 166:19 attach 167:9 attached 24:11 26:13 27:11 28:18 28:24 29:5,11,17 29:23 30:9,17 31:18 34:2,12 35:4,20 40:8 43:1 43:15 91:2 99:4 130:3 133:20 150:8 165:7 attaching 120:25 126:5 attempted 97:5 attend 16:10 20:6 attended 89:15 attorney 9:5 21:22 32:25 33:3 37:22 42:11 72:17 73:2 78:9 118:7 134:4 134:6 163:5 attorneys 44:11 163:17 165:8
---	--	---	--

<p>audio 36:24 august 44:12 45:2 46:3,7,20 58:3 67:15 68:12 70:20 71:16 74:5 75:23 80:10 83:24 86:7 92:4,24 101:2 119:11 121:8 123:4 132:12,17 136:8,9 139:16 144:8,13 autoclave 123:21 automatically 163:8 165:13 available 165:10 165:14 avenue 15:17 aware 81:16 87:2 100:17,21 105:10 108:23 117:8 awhile 155:13</p>	<p>88:24 90:2 101:14 105:14 115:18 117:1 119:21,21 121:16 122:9,21 123:4 125:7 126:20 128:3,5 134:8,19 147:16 148:20 149:14 152:12 158:23 159:15 160:19 166:3 backed 70:2 background 11:21 23:25 107:8 bag 70:9 94:15 130:13,24 131:4 131:10 132:21,22 132:23 bags 29:2 31:22 70:7,17 92:23,25 93:6,9,11,12,12,16 93:21 94:5,10,23 95:4,18,25 96:9,12 96:14 101:16 102:24 129:1,22 130:2,4,7,8,17 bailey 4:20 ball 28:13 ballwanz 12:11 13:7 bank 90:9 103:11 bardill 4:12 barrett 82:3 based 64:4,5 67:7 67:24 71:2 86:22 105:19 108:17 109:2,8 110:18,20 110:21 112:15,17 113:17 115:9,12 115:15,22 119:13 139:6 145:23</p>	<p>157:20 164:14 basement 109:10 basically 57:8 61:20 78:17,19 122:14 157:4 basis 20:22 162:12 bathroom 8:15 bazaar 134:24 bedroom 65:13 beds 53:11 beginning 58:22 98:15,16 121:18 behalf 27:4 44:10 86:13 belief 118:1 believe 18:25 31:11 32:5 51:24 52:23 54:21 55:25 56:3,7,8 59:5 61:21 62:11 66:4 69:14 70:17 71:17 71:21 73:22 82:12 82:14,19 83:22 85:11 87:13,24 88:5 91:25 92:5 93:14 94:25 95:6 95:11,18 97:14,19 98:7,23 101:20,24 103:2,2,19 104:18 105:2 106:19 109:13 116:5 118:9,10,17,18 119:24 121:24 123:12,14,19,20 127:2 129:15 131:6,17,22,22 132:13 133:7 134:12 135:7 136:14 141:2,6 143:21 144:10 147:11 154:16,19</p>	<p>155:18 156:11 believed 49:11 believes 105:21 114:4 belonged 70:7 benefits 23:18 better 53:1 65:8 beyond 134:11 big 18:25 72:11 88:11 95:16,16 bill 50:8,13 53:19 110:2 140:2 144:18 billboards 38:19 38:21,23 billing 27:15 116:8 140:16 bin 72:7,10,14 103:22 biohazard 73:6,16 74:14 biohazardous 47:2 72:7 73:12 biology 19:5 birthday 12:16 66:5 139:19 bit 73:10 87:16 black 34:6 93:12 140:24 blank 24:5 31:3 blankets 85:15 bless 142:14 block 152:7 blog 39:7,8 40:25 151:10 154:20,21 155:7,8,10,24 blogger 154:17,18 blogs 11:11 151:1 155:20 blood 53:10,12</p>
b			
<p>b 1:21 5:8 6:5 12:13 13:7 17:6 162:5,10 163:7 165:12 b&w 2:24 babies 17:17 72:9 baby 16:22 82:23 bachelor's 21:16 back 9:13 22:23 25:25 26:3 32:22 33:13 37:19 40:2 43:7 44:1 48:25 51:6 52:17,18 54:18 55:1,4 56:13,23 57:12,18 60:22 62:21 63:8 64:11,14 68:15 70:4,5,18 71:12 74:1 80:10 87:21</p>			

<p>blue 131:6,19 board 3:8 5:24 20:18,19 30:7 43:6 48:12,19 49:16 50:6 53:15 53:16,21 54:13 62:9 68:22,22 71:9 76:10 77:10 77:24 78:18 79:12 79:13 81:13 82:20 99:24 100:10,17 100:20 101:4,10 107:12,14 117:10 117:20 122:19,20 162:6 bodoh 4:6 bones 72:15,19 born 12:14,18 bottom 120:10 box 122:8 boykin 145:12,13 break 8:11 31:14 43:19 124:22,24 125:24 126:14 breaking 105:10 breaks 8:6 briana 16:17 bring 72:16 brittney 50:24 51:23 52:4,9,13,16 52:22 53:4 54:18 54:25 55:5,9 56:3 56:3,8,25 broke 46:17 48:13 48:17 52:5 148:8 broken 67:11 100:16 broker 18:19 brought 11:15,22 24:21,24 25:5,9 26:6 27:5,18</p>	<p>34:19 35:17 40:21 43:3 49:25 149:24 brunswick 21:12 buckhead 68:15 buckner 36:11,12 36:19 37:14 52:5 52:12,24 55:15 57:1 64:2,9 65:3 66:22,23 67:8,9 148:7 building 4:14 40:5 bullage 17:5 bunch 103:12 burger 51:7 burnt 16:23,24,25 business 79:6 busy 78:11 butler 84:9 buy 130:2,8 bynum 41:22 104:11,14 105:6,8 105:10 152:23 bynum's 41:20 153:7</p>	<p>147:25 148:7 called 17:23 18:22 23:22 32:14 37:19 48:23,24 49:7,7 50:23 51:5,5,6 52:13,16,18 55:22 56:13,18,20,22 57:12,18 58:23 60:1,20,25 61:7 62:3,21,21,22 63:8 63:8 64:14 66:20 66:24,25,25 77:19 84:11 90:10 105:21 107:9 108:10 116:18 117:15,18 119:20 119:21 120:3,21 134:25 136:3 137:8 147:16 154:6 calling 37:18 52:10 55:14,21 57:5,10 58:5 60:2 66:6 67:10 106:22 114:21 116:22 117:19 133:15 135:12 136:16 143:5 calls 36:4 37:7,24 50:3 63:18 66:23 116:19 136:7,11 142:3 campaign 152:4 campaigns 151:18 campus 16:19 capitol 147:15 156:5 caption 164:4 car 70:2 85:6,7,14 85:16</p>	<p>card 42:8 care 48:25 49:3 65:5 76:12 77:24 141:13 cared 57:7 careful 108:18 carolina 156:20 carried 111:3 cars 111:19 case 9:22 10:22 11:3,9,23 27:8 33:21,25 35:24 44:6 46:15 50:7 64:20 79:24 91:7 104:11,16,20 105:4,5 118:8 128:6 148:21 151:5 162:11,12 163:7 165:6,8,12 cash 28:22 101:19 139:12 141:1 cataloged 132:8 catch 90:12,19 category 25:18 catherine's 50:17 catholic 20:7 50:18 88:18 catholics 88:18 cause 6:8 ccr 1:25 164:22 cd 37:1 cell 35:16 41:15,16 41:22 42:6 62:3 center 40:16 86:5 122:16 centers 33:6 35:9 78:20,24 79:5 80:4 ceremony 89:22 153:8</p>
	<p>c</p>		
	<p>c 4:1,11 5:1 162:8 164:1,1 calendar 44:4 70:21 165:14 call 27:20 36:5,9 36:11,16,18 48:18 50:8,12 51:4 56:19 59:18 60:5 61:10 62:7,17,19 63:5,11,18 64:2,5 64:8,11 77:12 84:13 99:16 101:1 105:14 107:21 111:16 113:1 118:13 136:20 141:8,20 143:17</p>		

certainly 65:7 80:25 125:19 certificate 2:7 165:2 certificates 54:5 165:9 certified 6:1 162:13 163:14 165:5,6,8,9 certify 6:2 164:2 167:2 chance 48:1 change 67:23 167:11,13,14,16 167:17,19,20,22 167:23,25 168:1,3 168:4,6,7,9,10,12 168:13,15,16,18 changed 23:17 25:8 67:20 160:16 changes 161:4 163:16 167:4,5,7 charge 35:8 58:25 78:16 90:6,7 123:19,21 152:3 charities 20:16 charity 20:21 charles 15:11 checked 39:9 63:17 checkmark 106:15 checks 102:1 cherokee 20:1 chicken 45:17 chief 49:8 58:6 68:1,19 children 13:3,8,12 13:13,25 17:18 18:14 50:25 51:22 52:25 60:6 75:5 114:23	choice 86:4 chris 84:4,6,8,14 84:15,16 100:3 121:25 122:4,5 christmas 148:19 christy 98:7 106:23,24 108:15 113:3 114:12 118:19 126:6,9 136:6 chronological 26:16 chuck 15:10 church 20:2,6,7 50:18 circled 116:3 civic 20:3,8 civil 1:5 6:3,14 100:12,23 101:11 107:17 167:6 claim 22:17 clarify 150:11 classified 64:25 cleaning 65:13 123:21 cleansing 153:8 clear 128:23 clients 127:19 clinic 41:20,23,24 53:20 56:6 75:9 86:8,15 100:5 124:12 156:16,21 156:24 clinics 85:23 86:5 87:19 156:18 157:6 clip 91:11 clippings 87:25 close 70:3 109:18 152:17	closed 68:23 71:10 82:20 88:22 89:8 153:9,15,24 closely 113:17 closing 78:24 club 20:14 cobb 1:2 4:7 10:2 13:17,21 14:18 15:2,22 19:24 30:20 38:8 39:14 40:15 46:5,12 58:6 59:22,23 63:8 72:16 88:21 89:7 104:24 105:5 107:4 109:18 153:4 154:7,11 code 162:23 164:12 codes 116:3,4 college 21:11 87:11 colloquies 163:13 164:4 165:5 color 70:13 colored 94:12 columbus 50:19 86:21 com 145:12 comcast.net 119:8 come 55:1,4 60:8 61:19 66:21 81:25 82:10 109:11,23 109:25 111:17 138:12 147:21 152:12 comes 110:12 139:25 comfort 8:11 comfortable 160:7 coming 12:16 53:21,23 68:14	69:14,21,25 80:17 124:18 comm 2:22 commencing 6:6 comment 88:2 commented 11:10 commission 76:18 168:25 commissioner 6:2 32:10,12,14 33:1 33:10 46:23 47:8 47:16,20 48:7 65:14 66:11 68:10 76:21 78:7,13,15 80:3 100:10 commitment 164:17 committed 68:6 common 104:10 115:19 communicated 83:23 150:21 communicating 148:15 communication 2:12,13,23 134:11 141:20 142:2,3 148:22 communications 2:25 3:7 83:19 133:5 141:17 community 20:9 30:6 31:15 32:18 69:24 77:9 81:11 122:15 companies 18:25 116:10 company 17:23,25 18:1,21 19:21 23:12,20,23 103:11 165:1
--	--	---	---

compensation 162:25 164:14 complain 101:10 complaining 101:21 complaint 10:12 10:13 30:6 32:18 32:24 43:6 44:9 79:10 100:23 107:18 157:20,21 complaints 68:23 complete 101:4 162:17 163:13 165:5,7 completed 127:7 166:8,16 complex's 121:11 121:21 compliance 162:3 162:23 164:12 complications 116:21 composite 39:24 43:6 117:10 compromised 108:22 computer 138:5 149:21 150:6 164:6 concerned 35:12 127:19 concerns 103:21 condition 101:22 conducting 27:3 conference 36:16 36:19 147:25 confidence 68:21 confines 129:2 confirm 8:16 97:23 150:12	confiscated 58:18 137:3 confused 45:1 constantly 99:22 100:1,5 103:22,24 104:5 111:8 consulting 41:18 152:22 153:7 contact 27:16 29:8 98:10 100:11,20 101:9 102:10 106:21 107:17 110:13 111:10,12 112:2 115:11 118:24 124:9 133:9 134:5 141:5 141:11 147:23 166:8,9 contacted 163:4 container 72:11 continued 131:15 148:15 continuing 79:17 contraceptive 144:20 contract 162:24 164:13 contracts 162:11 conversation 67:7 106:20 116:13 137:14 142:16 146:11,12 conversational 8:5 conversations 35:23 37:7,12 84:14 107:24 120:19 convinced 53:7 cook 32:12 33:10 46:23 47:8,16,20 65:15 68:10 78:7	78:13,16 79:4 cook's 48:8 66:11 76:21 100:11 cool 19:6 coordinators 165:5,9 copied 119:3 126:1 copies 9:24 10:14 10:20 28:1,2 38:3 38:9 39:21 41:12 41:14 107:2 119:7 119:22,23 137:25 138:7,9,12 151:7 158:18 160:4,8 165:9 cops 90:3 copy 24:13,14,16 28:5,7,18,24 29:5 29:11,17,23 30:9 30:17 31:18 35:16 36:2,21 37:4 45:15 59:25 64:18 91:9 106:2 119:2 132:2 137:23 138:3 143:23 145:24,25 149:9 158:18 165:7 coretta 135:6 137:14 correct 39:15 57:19 77:4,7 80:9 92:15,19 93:23 94:13,25 96:11,16 98:1,3 101:6 106:4 128:11 130:1 132:19 138:2,15 146:25 150:16,19 154:1 163:12 164:7 165:5,7	corrections 167:9 correspond 84:15 correspondence 3:10 25:3 26:8,10 26:19,20,22 27:2 33:20 38:8 42:22 43:9 49:23 105:17 134:13,15 143:25 144:3 cost 31:11 costco 130:8 council 5:24 counsel 6:13 128:22 129:23 counseling 38:24 38:25 68:16 75:11 83:11 146:22 counselor 124:12 count 69:5 county 1:2 10:2 12:23 13:17,21 14:18 15:2,23 20:1 21:11 30:20 38:8 39:14 40:15 46:5,12 58:6 59:22,23 63:9 72:17 88:21 89:7 107:4 153:4 154:8 couple 8:8 65:12 91:21 96:23 121:9 126:25 134:22 152:11 160:22 course 52:8 66:24 69:3 court 1:1,24 5:24 6:1 10:2 11:4 15:23,24 127:2,5 158:22 159:6,10 159:14 160:10,12 160:17 162:6,13 163:14 164:18
--	---	--	---

<p>165:6 166:11 crawl 129:4 cries 102:20 crimes 90:6 criminal 48:14 49:13 69:2 73:4 crinkled 28:13 crisis 40:16 crying 60:12 61:20 curious 108:8 current 12:20 41:16 currently 16:11 22:4,24 55:17 77:1 107:11 117:6 custody 76:2,22</p>	<p>127:6 158:22,25 160:18 164:22 davis 147:10,12 156:3 day 53:18 55:18 56:1 59:17 60:2 81:21 82:18 83:6 88:7,9,12,17 95:8 101:20 102:9 109:12,22,24 112:20 113:14,15 113:21,25 115:4 116:19 124:2 136:5 144:11 168:21 days 52:9 66:24 136:5 151:18,19 151:23 152:4 166:8 de 20:7 deal 147:18,21 deal's 78:8 december 12:15 14:22 127:3 decided 33:10 47:24 48:5 79:20 79:23 81:17 123:4 125:7 decides 54:18 decision 160:5 dee 104:22,22 def 2:11,12,13,14 2:15,16,17,18,19 2:20,21,22,23,24 2:25 3:3,4,5,6,7,8 3:9,10,11 defendant 1:13 4:18 22:8 defendant's 24:6 24:11 26:11,13,19 27:9,11 28:18,20</p>	<p>28:24 29:5,11,17 29:23 30:9,14,17 31:12,18 33:14,23 34:2,5,12,15 35:4 35:14,18,20 40:8 43:1,12,15 90:25 91:2 99:4 150:8 defense 128:22 defensive 57:4 definitely 58:17 109:22 degree 19:16 21:16,16 degrees 54:4 department 30:21 31:15 32:17 46:5 59:23 63:9 77:9 81:10 88:22 89:8 107:17 122:14 depict 41:22 depo 2:11 24:16 144:19 147:2 deponent 166:2,6 166:8,11 deponent's 168:20 deposition 1:16 6:12,18,25 7:13 8:22 9:9,14,17 11:9 24:9,20 104:11,16,19 105:3,7,20 126:24 127:7 150:3 161:1 161:10 164:3 165:11 166:6,11 167:8 depositions 10:21 describe 130:23 described 129:2 desire 167:7 detail 87:16 109:1</p>	<p>detailed 21:6 determine 57:25 determined 67:15 162:25 developer 156:3 diagnosis 144:25 diary 11:8 different 10:14 24:25 57:5 79:3 97:4 109:16 114:22 115:5 147:20 151:18 156:18 diniz 84:4,6 102:20,21 direct 124:9 162:24 164:13 direction 58:11 directions 7:17 30:23 directly 84:7 director 35:8 discern 70:6 disciplinary 102:17 disclosed 92:17 disclosure 2:6 5:22 162:7 165:2 disclosures 162:1 162:3 163:2 discount 110:2 163:10 165:13 discounts 163:8 165:12 discuss 33:2 46:24 154:15 155:20 discussed 9:3,12 discussion 25:23 disgusting 97:2 disposal 122:8</p>
<p>d</p>			
<p>d 2:1 dallas 1:22 5:9 6:6 12:22 15:17 20:7 damages 117:4 dangerous 52:23 134:24 157:5 daniel 107:3 155:8 danielle 1:12 58:11 118:22 141:23 dared 73:2 dark 54:20 data 90:9 date 6:3 58:1 59:12 82:9 83:16 86:18 107:5 108:12 112:23 114:13 127:8 139:21 144:7 160:20,21 166:3 dates 112:21 david 1:25 6:1 7:20 17:20 73:9 78:7,15 79:4</p>			

<p>disposed 121:11 121:21 123:25 disposing 133:13 disqualification 162:8 disqualify 162:21 164:10 district 72:17 73:1 disturbed 55:14 division 101:11 doctor 141:10 doctor's 87:7 doctors 78:18,25 85:21 87:14,22 155:21 document 24:10 26:12 27:10 28:17 28:23 29:4,10,16 29:22 30:8,16 31:17 34:1,11 35:3,19 42:25 43:14 66:11 91:1 99:3 128:10 137:7 150:7 documentation 27:14 33:16 34:15 51:14 documents 2:21 10:16,18 11:3,22 26:6 27:20 28:11 28:22 29:2 30:2 31:13 40:7 49:5 59:11 66:16 70:10 72:2 73:23 79:22 87:23 110:10 115:15,23 121:1,1 121:7 125:13,21 126:6,7,9 127:18 128:5 131:9,20 139:15 158:6,8 160:7</p>	<p>doe 1:8,8,8,9 doing 23:8 38:23 38:24 48:2 52:2 68:16 69:2 71:3 122:6 123:15,20 152:19 155:16 dollars 22:18 52:19 dominick 16:21 door 111:18 doors 69:25 152:17 dot 145:11 dr 30:24 31:4,8 32:19 33:24 34:8 36:10 38:1,5 40:20,24 41:22 42:23 43:7 46:17 46:24 47:21 49:4 49:12,21 50:11 51:24 53:2,9,20 54:19 55:16 56:8 58:11,25 59:18 60:4 61:18 62:5,8 66:6,12,19 68:5,25 70:8 74:15,20,23 75:1,6 79:15,21 80:21 81:1,5,19,23 84:1,20 85:20 86:2,5 87:4,10,11 88:3 89:16,19 90:3,9 92:6,13,16 94:11 96:6 99:25 100:7,15 101:5,21 102:1,25 103:23 104:13 105:11 107:3,6,10 108:12 109:25 111:2,7 113:21,25 116:21 118:4 120:12 121:19 122:6</p>	<p>123:5,15,24 138:25 143:6 148:5 151:16 152:23 153:3,14 155:8,16 dragging 122:24 drive 75:16 85:7 driver 110:17 111:4,10 115:12 141:6 driving 62:2 63:1 68:17 69:7 75:12 drove 69:8,13 75:15 80:13 93:24 drug 47:13 drugs 47:1,1 duct 53:11 due 127:1 166:3 duly 7:8 dump 95:2 dumping 123:5 125:8,10,15 dumpster 28:11 30:3,6 42:4 46:25 47:12,19 58:1 60:4 66:16 67:3 69:13,24,24 70:3,4 71:7,14 72:2,6 74:2,4,11 75:23 78:4 79:23,25 80:11,18 83:4,6 93:7 94:9 95:4,7 95:12,13,14,15 96:1,10,10,13,17 96:19 110:11 121:9,11,21 127:18 128:23 129:4,6,8 132:6,18</p>	<p>e e 1:12,20 2:1 4:1,1 5:1,1,5 6:5 14:9 14:25 82:6 108:6 164:1,1 167:6,7 eagle 107:9 157:1 157:13,24 earlier 88:2 94:8 102:6 127:17 early 52:21 easier 130:21 easy 69:17 eaten 96:24 education 20:24 21:19 79:17 edwards 124:14 124:15 eight 29:19 35:22 36:7 113:11 135:21 139:3 140:7,12 either 11:8 37:11 56:21 59:15 77:8 78:25 117:13 119:20 132:25 133:5 136:5 eleven 52:19 113:11 120:25 eli 16:22 email 2:12,13,23 3:7,10 25:6,7 26:9 33:20 36:1,22,24 37:22 39:11 42:21 46:3 50:3,4 67:25 71:8 76:20 82:8 82:16 84:15 99:8 99:13 105:18,22 106:14 109:14 118:18,25 119:1,6 119:23 120:16,21 120:22,24 121:3</p>
--	--	--	---

<p>122:11 125:25 133:5,11,17,22 134:13,14 137:2 137:23 138:4 143:25 144:3 145:20 146:2 158:19,21 166:9 emailed 36:13 46:19 120:10 137:19 138:1 143:23 145:25 148:18 emailing 46:10 emails 27:6 33:23 35:6 45:5,22 98:22 99:1 119:1 119:1,7 120:6 133:20,20 134:19 138:10 150:5 emergency 111:10 111:12 112:2 141:5,10 emily 99:22 employed 22:4 employee 27:15,16 29:7 37:12,13,25 37:25 40:19,19 42:23 47:5,6 50:11 60:3 65:3 84:19 102:10,18 124:4 133:11,18 employee's 102:11 employees 42:5,15 42:15,23 49:24 51:3 54:3 58:15 69:14,21 71:8 80:17,20 81:1,5 100:2 104:9 111:14 117:9 121:24 123:3,9,11 124:7,8,9,13 125:6</p>	<p>133:12 134:6 empty 69:9 emt 19:13,17 22:2 enclosed 80:18 ended 52:10 57:10 116:16 121:23 english 113:12 enrique 5:6 entered 167:8 entire 111:4 129:8 entrance 70:5 envelope 132:11 132:14 158:19 environment 117:8 epps 49:19 52:10 55:23 56:1,4,16 57:17 59:11 equipment 53:10 123:25 errata 166:3,16 167:1 errors 6:19 escalated 65:4 et 1:12 ethics 162:23 164:12 eucharist 88:13 event 147:15 156:5,7 events 115:22 everybody 54:1,5 61:1 evidence 48:9,14 72:17 73:1 121:10 121:20 122:23 164:7 evident 116:23 evolving 153:19 exact 59:12 130:7</p>	<p>exactly 9:11 11:19 81:7 98:16 examination 2:3 6:8 7:11 127:16 131:15 examined 7:8 exchange 109:14 exclusively 165:8 exhibit 2:11,12,13 2:14,15,16,17,18 2:19,20,21,22,23 2:24,25 3:2,3,4,5,6 3:7,8,9,10,11 24:7 24:11,24 26:11,13 26:19,20 27:9,11 28:18,20,24 29:5 29:11,17,23 30:9 30:15,17 31:12,18 33:13,14,23 34:2,6 34:12,14,15 35:4 35:15,18,20 39:22 42:24 43:1,13,15 65:17 66:14 90:25 91:2 92:2 97:10 97:25 98:18,25 99:4 106:6,11 109:3 112:1 120:7 127:20 128:17,19 131:21 133:24 134:15,18 135:20 137:20 139:3 140:2 142:5 145:3 145:5 150:8,13 151:9 159:7,7 exhibits 2:9,10 3:1 39:21 40:8 76:4 163:16,17,20 165:7,8 exit 75:19 experience 114:21 124:17</p>	<p>expires 168:25 explain 56:5 66:17 78:15 79:19 116:1 explained 78:5 exposed 88:13 expressed 119:20 extent 11:2 exterminating 17:22 extreme 78:18 extremely 55:14 56:18</p>
f			
<p>f 164:1 face 24:5 113:20 facebook 38:20 39:4 41:1,8 151:1 151:9 154:4,14,16 154:17,23 155:3 156:11,25 facilities 33:5 35:9 78:17 79:3 89:18 110:23 114:22 115:13 facility 38:25 41:17,25 48:4 53:18 58:12 63:1 64:6 68:15,16,18 85:21,22 86:21 88:20 109:10,18 153:22 fact 64:5 66:19 71:4 79:14 109:12 145:23 facts 49:3 fair 11:2 137:12 137:17 faith 100:9 family 15:13 21:25 35:1 156:13</p>			

far 133:5 135:24 farner 104:22 fast 54:17 father 13:2 father's 13:6 faxes 101:23 102:3 fbi 28:12 29:20 30:4 46:9,14 48:22 49:9,11 51:12,12 52:10 55:10,11,15 57:3 58:10,18 64:19 65:7 68:20 76:3 77:10 98:2 107:21 132:3 137:3,5 138:7,11,13,17 150:23 february 32:5,8 42:6 71:17 74:6 75:22,24 76:8,13 76:23 77:3,13 78:4 79:24 federal 167:6 federation 101:24 102:1 feel 65:8 fellow 88:18 felony 48:3 79:15 152:19 felt 83:13 90:19 ferry 4:13 63:19 fetal 72:9,14 87:22 121:23 122:7 fiance's 14:24 figure 28:4 67:14 97:5 100:5 figured 125:19 file 36:24 65:22 120:12 filed 44:10 166:11	files 100:22 filing 10:11 117:20 filings 9:22,25 fill 161:4 filled 95:17,19 113:2,3 129:8 141:10 finally 49:15 56:13 128:21 130:23 financial 124:20 162:9 165:14 find 24:24 42:9,10 45:21 51:20 59:13 62:5 65:21,23 69:18 75:24 81:17 83:1,25 87:6 101:15 124:16 143:20 150:5 153:18 finding 80:7 87:17 121:23 fine 28:3 57:21 79:16 159:21 finish 7:19 42:19 160:23 finished 126:24 fire 46:5,11,13,16 48:13,17,21 49:8 49:12 54:8,9,10 56:7,9 58:6,7,12 68:1,2,3,6,19 fired 100:3 104:13 firm 25:4 163:2 165:2 first 7:8 25:2 28:5 31:6 44:13 47:19 72:20 98:7 99:8 109:22,24 112:24 113:14 114:20 121:6 147:1 150:4 150:11 161:3	five 13:3,8 29:2 33:15 56:23 63:24 64:14 68:23 70:7 70:17 92:23 93:21 94:10 100:8 101:15 102:24 135:7,15 148:12 flags 22:13,15 flier 30:24 39:12 flip 106:6 111:22 flipping 112:7 florence 110:17 folder 2:14,15,16 2:17,18,19,20 27:24 28:8,21 29:1,7,21 30:2 folders 27:20 follow 124:23 127:12 139:13,14 following 6:9 162:2 167:5 follows 7:9 food 94:19,20 97:2 97:8 102:6,7 foregoing 164:3 165:4 forget 8:2,5,9 15:24 124:25 125:3 form 11:8,9 96:2 109:6 110:1,19,20 110:22 111:11,16 111:25 114:1,2,6,9 114:15 140:4 167:7,9 formal 21:18 formaldehyde 72:25 format 36:2,22 forms 30:5 31:4 109:21 115:9	131:6 144:10 162:7 forth 134:19 148:20 forward 54:17 124:8 found 11:23 27:21 29:19 30:3 31:22 32:5 34:8 39:21 44:5,11,19 46:4,20 46:24 52:12 53:20 58:6,14 60:3 65:13 66:8,16 67:1,16 71:7 77:2 77:13 78:22 79:14 85:16 86:24 87:3 91:6 92:4,12,20,23 94:22 99:16 101:2 103:7 118:13,17 118:19 119:11 121:7 128:22 129:1 136:8 143:16 152:18 155:16,24 four 13:11,13 18:16 27:2,13 35:23 36:4 37:8 42:7 44:10 50:25 51:21 63:24 66:9 68:23 91:7 92:3 101:2,16 106:11 107:25 109:5 119:18,24 120:25 121:1 127:19 129:3 135:15 137:25 138:1 146:3 151:5 fourth 106:8 frame 32:3 44:14 99:14
---	---	--	--

<p>fraud 46:25 110:6 free 51:2 154:12 friday 51:7 58:23 59:6 friend 32:13 62:2 62:22,25 65:25 66:2 84:8 110:16 116:7 147:10,24 friend's 62:3 friends 18:1 53:3 86:20 front 28:8 29:2 50:9 72:7,10 73:18 88:20 144:15 full 12:1 17:16 19:11 47:1 51:25 furnish 167:9 further 150:6 165:7</p>	<p>generated 38:4 georgia 1:2,22 3:8 4:9,15,23 5:9,25 6:3,6,14 10:2 15:21 16:1 20:3 33:4 43:6 48:12 76:10 86:15,21 97:21 123:17 156:5 162:3,14 164:24 165:5,9 166:8 getting 9:17 19:20 49:4,10,18 51:3 66:22,23 give 7:17,22 8:18 11:25 26:3 36:1 48:11 51:13,21 59:25 64:18 73:1 81:20 82:9 98:18 110:1 113:9 140:10 given 7:12 28:12 29:20 30:4,20 31:10 39:10 47:16 48:10 55:15 57:2 72:8 77:25 104:19 107:20 118:5,20 118:23 120:15 135:24 164:7 167:8 giving 46:8,9 49:20 68:3,20 161:3 gloves 72:23 85:15 gmail 145:11 go 7:1 19:11 20:25 24:23 25:18,18,20 25:25 38:11,13,14 38:15 44:1 48:5 51:17 52:17 53:8 54:18 62:11 68:11</p>	<p>72:6,23 73:15 75:1,21 78:3 79:23 81:17 83:4 86:14 88:8,23 89:1,4 90:3,13,17 91:14 92:25 93:6 98:5 100:14 117:1 118:3 123:4 125:7 126:23 127:11 152:6 155:2 god 142:14 goes 24:5 152:21 going 8:7,10 9:11 9:12 10:17 11:20 19:18 20:9 22:23 24:6 26:2,4,10 27:23,25 28:4,10 28:20 30:14 31:12 33:13,22 34:5 35:2 39:22,24 42:24 44:4 48:8 51:10,12 53:8 54:18 55:5,23 56:19 57:12 60:19 60:24 61:18 62:8 62:16 66:21 67:12 69:16 72:13 74:19 79:25 80:10 81:18 81:24 82:18 84:1 84:20 87:15,17,17 87:21 88:17,24 90:14,24 91:18 92:21 98:5,25 100:4,6 101:8 102:18 105:14 112:3,15 118:10 121:4 126:20,23 126:24 132:4 134:19 142:6,8 148:21 149:23,24 150:1 152:10</p>	<p>159:6,10,19,20 160:17 good 48:1 51:17 57:22 79:21 goodness 17:1 61:21 gotten 48:18 85:18 122:20 governor 78:8 147:18,20 governor's 29:3 30:25 31:23 34:8 40:17 50:9 71:14 74:4 75:16 89:17 89:20 95:2 111:7 152:16 graduate 21:13 graduated 21:1 graham 36:12,13 36:18,19 67:8 145:2,11 146:11 148:11 grammatical 6:19 grandkids 18:16 great 28:16 greeted 54:24 greetings 166:5 ground 95:10 96:4 96:4,6,13 129:14 group 27:17 33:17 34:25 39:17 40:20 42:3 74:14 guess 27:19 40:25 46:14 55:6 64:1 90:20 102:10 104:13 108:16 114:10 120:18,18 120:20 140:10 gun 66:10,18 guy 49:8</p>
g			
<p>g 4:5 14:9,25 ga 165:10 166:19 gain 9:24 gained 110:4 gaither 135:6,22 137:14,14,20 138:4 141:18 gaither's 138:23 garbage 70:7 94:19 95:8 96:4,5 96:18 gate 69:15,22,23 80:17 gates 70:1 95:23 gather 8:22 general 33:1,3 78:9 108:1 150:18 generally 108:20 116:12 117:14</p>			

<p>gyn 27:17 33:17 38:6,15 39:17 40:20 42:3,16 139:14 141:1 152:15 153:15,24 gynecology 41:18 152:22 153:7</p>	<p>hardened 72:15 haul 95:16 head 8:1,1 50:18 73:2 89:9 99:23 120:17 121:12 143:8,11 147:4 heads 81:20</p>	<p>hire 52:18 hired 104:12 hispanic 84:9 hodge 73:24 holy 69:15 88:13 home 19:1,9 23:1 23:5 60:6,8 75:12</p>	<p>hundred 124:1 hung 56:20 husband 9:5 13:2 16:5 23:13 51:10 51:16 husband's 13:4 15:9 17:19</p>
<p>h</p>	<p>health 31:16 32:18</p>	<p>75:16,19 76:8,11</p>	<p>i</p>
<p>h 14:9,9 haggerty 50:8,13 53:19 54:15 half 125:13 127:24 127:24 128:9 158:4 hand 25:17 149:10 handed 76:9 92:7 92:9,14 handful 17:11 handled 165:8 handling 65:7 handwriting 28:14 31:7 106:10 109:12,13 142:10 144:24 145:7 handwritten 3:11 31:9 45:9 65:20 66:3 91:21,22,24 92:1 135:15,23,25 142:6 145:6 146:3 hanging 95:20 111:8 happen 101:8 148:2 happened 33:7 44:7 45:11 50:5 53:17 56:17,25 58:16 59:14 63:11 66:9 96:21 115:16 happy 148:19,19 hard 23:14 39:25 72:19,24 132:1</p>	<p>77:9 81:11 122:15 healthcare 34:18 35:7 78:17 heard 52:4 56:6,17 68:19 86:23 149:7 153:20 166:11 hearing 54:11,16 heck 159:3 held 153:8 heleen 59:20 hell 62:5 hello 106:23 help 44:4,6 45:10 58:7 73:25 80:3 81:10 83:25 124:19,20 146:22 helped 84:14 153:11 156:23,25 157:14,18 helpful 84:22 helping 32:13 156:18 hewitt 23:22 hi 120:11 hickory 16:23,25 16:25 high 16:17,18 20:25 21:1,2,8 23:10 53:3 highly 110:3 hipaa 59:1 100:12 100:16,22 101:11 107:18,19 117:20</p>	<p>92:25 93:7,8,24 96:21 hopefully 90:15 126:25 hoping 101:3 hour 37:23 52:1 52:19 59:5 63:7 89:1 158:4 hours 8:8 62:20 79:17 96:23,23 128:4,4 151:21 house 47:14 60:6 61:19 65:21,22 94:6 houses 101:22 howard 13:7 hub 159:1 huff 4:20 huh 120:17 121:12 143:8,11 147:4 huiel 2:13 98:8,23 99:2,9,16 105:14 105:14 106:17,23 107:25 112:17 113:24 114:12 115:23 116:13 118:10 120:6,10 126:2 133:4,6 134:11,16 136:6 139:5 143:21 huiel's 105:20 112:7 126:6</p>	<p>idea 51:17 147:14 identifiable 103:13 108:21 identified 30:19 31:14 62:24 identifier 28:16 identifying 61:6 illegal 48:2 79:15 100:4 110:3 123:16 illegally 51:13 152:19 illinois 156:19,19 impacts 164:17 impair 8:18 impartial 164:18 impartiality 162:22 164:11 important 64:12 79:20 impression 111:9 incident 65:10 73:13,16 134:25 incidents 59:24 included 77:5 97:10,25 109:3 134:15 136:24 146:3 includes 30:22 31:21 154:3 including 27:14 39:18 40:20 46:25 107:12 115:1</p>

<p>independent 106:17 107:7,24 135:12 136:2 137:13 146:10 index 2:9 3:1 indicate 48:2 109:4 123:6 125:16 144:6 indicating 66:2 131:23 160:13 individual 112:2,3 individuals 74:14 infection 124:3 infections 117:1 infiniti 85:9,11 info 28:13 29:8 information 24:21 27:16 30:20,22 31:14 33:19 34:20 43:5 46:4,8 47:5,6 47:9 49:4,6,11,18 49:20,21 51:20 52:11 55:16,24 57:2,22 58:9,13,14 63:13 64:12,17,25 65:9,14 66:15 68:20 71:2 72:8 74:9 78:1 80:1,2,8 81:10 83:7 84:19 87:1,6 90:8 92:17 101:25 103:6,12 103:13,25 104:6 105:1 107:21 108:21 110:4,8 115:11,13 118:6 118:24 122:3,5 125:8 134:6 139:6 140:10 141:6,6,11 141:16 153:21 160:18 166:9</p>	<p>initial 146:12 initially 101:1 injured 35:13 inlaws 15:5,6 inside 28:6 39:18 53:9 74:23 75:1,3 75:6 95:13,25 96:9 129:4 130:3 130:17 131:9 inspections 79:9 instagram 155:1 institutions 34:18 instruct 114:7 insurance 116:10 140:8,9 intake 30:5 109:9 144:9 interest 119:20 162:9,19 164:9 interested 118:2 interesting 149:16 interfere 90:20 interfering 57:6 intermingled 97:3 internal 44:25 102:15 internet 39:2 150:14 internship 52:3 interrupt 83:15 interrupting 112:14 interstate 75:20 intuition 64:4 investigate 53:24 investigated 49:14 49:15 81:16 investigating 49:9 53:16 59:1 81:13 87:19 99:24 117:7</p>	<p>investigation 54:13 55:16 57:3 57:7 58:8 62:8 71:10 82:21 84:22 88:22 89:3,8 90:7 90:12,14 101:4 107:11 122:15 123:7 125:17,20 investigations 68:24 84:1 99:23 122:12 investigative 150:22 investigator 46:12 46:14 107:8 117:11 invite 147:15 invited 75:3 147:16 invoices 102:4 involved 22:7 53:5 74:19 156:15,17 157:13 issue 44:6 101:5 117:15 127:12 issued 51:25 items 31:22 34:7 ivy 17:5 124:20</p>	<p>jill 1:9 joan 1:8 job 19:24 23:6,17 51:25 jobs 124:16 johnson's 124:20 joiner 51:23 jointly 26:10 judge 10:16 judicial 5:24 july 28:11,22 29:3 29:20 44:16,17,17 44:20 45:3,7 49:14 67:19 76:7 112:23,24 115:18 132:5,15,16 139:16,17 june 115:17 122:21 jurat 161:4</p>
			k
			<p>kaitlin 14:4 17:15 katherine 18:13 147:10,12,24 148:3 156:3 katherine's 147:14 kathy 15:8 kathy's 15:9 katie 18:13 19:1 keep 28:2 51:19 57:8 91:18 137:1 142:6 154:11 kept 11:7 60:9 72:7 85:18 kids 16:9 18:7 kill 61:19 66:21 kind 24:23 25:13 85:7 98:5 105:10 121:3 130:13 king 51:8</p>

<p>kirkland 99:22 117:6 kitchen 93:16 130:8 kiwanis 20:14 knew 47:21,22 51:11 52:25 53:16 54:9 55:15 61:13 61:14 63:9,24 80:20,24 82:23 83:3 84:11 87:2,9 87:24 94:20 123:6 125:19 133:12 150:10 knight 50:18 knotted 93:10 know 6:16 18:5,21 18:23,24 19:14,21 20:13 21:5 22:23 23:18 24:17 26:15 31:25 33:7,9,12 34:24 38:23 40:12 42:7,11 44:12,24 45:3 49:10,22 50:3 51:18 52:9 55:20 60:22 61:8 61:10,22 62:15,18 65:2,4,9,24 66:22 67:6,9 68:5 70:21 71:5 72:3 76:7 77:19,22 82:12 83:5 86:17,18 88:23 89:2,6,12 90:20 96:4,5,6,9 96:14,23 98:20 100:15,20 101:9 103:16 105:1,4 107:1,10,21 108:11,11,14,15 108:16,20 109:12 110:18,21,22,24</p>	<p>111:13,17 113:3 113:12,14 114:21 115:4,13 116:6,15 116:17,22 117:6 117:17,19 118:7 120:20 122:2 123:13 124:6,13 125:16 126:10,11 126:12,13 131:24 137:6,9 138:7 141:4 142:17,19 142:25 143:22,25 145:12,20 146:5,9 146:15,22 148:4 148:16,20,20,24 149:2 157:4 158:11 knowing 110:12 known 12:10 79:12 87:18,20 107:14</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>I 6:1 12:13,13 13:7 13:7 14:9 108:6 164:22 lady 63:11 lady's 43:18 lakewood 21:2,2 landlord 101:20 lansing 12:19 large 102:2 larry 129:19 late 30:23 153:21 155:16 lauren 65:25 66:2 76:20,25 77:8 124:10 law 1:20 6:4 21:22 25:4 79:5 100:16 162:4 166:8</p>	<p>lawn 73:18 lawrence 4:11 laws 33:4 105:11 lawsuit 22:8,21 111:5 117:21 118:3 143:17 145:12 lawyer 6:17 7:16 8:24 9:19 11:18 36:2 118:13 119:14 143:17 160:19,22 lawyers 72:25 lay 122:11 lcr 1:25 164:22 lead 144:10 leads 134:3 learned 104:10 146:14 152:15 leave 53:18 54:3 54:13 55:12 62:17 62:19 126:22 158:16 leaving 21:19 led 56:7,8 left 49:7 56:21 60:16 61:8 69:20 70:2 145:10,17 leg 22:14 legal 21:22 leslie 71:10 82:3 82:19 83:9,19 121:14 leslie's 109:13 letter 48:7 license 19:20 51:1 97:21 123:18 164:23,24,25 licensed 78:20,23 79:7</p>	<p>licenses 54:4 licensing 35:8 78:16 123:16 lid 95:16,16,21,23 95:24 lied 55:10 life 20:10 50:20 63:16 74:9 86:14 86:19 147:16 151:18 152:4 154:15 155:4,20 likes 19:8 37:23 limbs 72:24 limited 27:14 line 10:3 48:22 152:6 167:11,14 167:17,20,23 168:1,4,7,10,13,16 links 154:19 list 37:8 listed 166:6 listen 65:1 litigation 11:3 litsup 165:10 little 11:13 35:1 73:10 87:16 91:11 156:13 live 12:25 13:8,16 15:2,16,18 157:16 lived 15:13 61:15 lives 14:18 living 114:24 llc 4:12 157:7 llp 4:6 loans 103:14 log 102:10 long 8:8,9 15:4,12 15:18 39:8 46:22 51:20 60:2 88:24 95:1 121:3 143:7</p>
---	---	---	---

<p>look 41:6 44:22 45:13 68:12 70:21 108:25 120:5,9 124:6 130:16 137:20 139:4 looked 10:9,11,14 44:15 57:25 90:8 102:16 130:7 looking 45:5 82:8 110:11 113:10,17 133:10,17 139:19 looks 32:9 44:15 112:22 115:16 120:9 136:15 139:12,15,23 140:16,23 145:10 145:13 155:12 lose 100:9 lost 55:21 lot 12:8 24:21 51:11 63:4 67:10 69:8 93:2 101:18 110:14 111:9 116:16 156:17 lunch 89:1</p>	<p>malloy 86:5 malloy's 85:21 87:10 management 23:18 manager 104:12 104:24 manila 2:19,20 manilla 2:14,15,16 2:17,18 27:20 map 11:25 march 32:10 47:17 margarita 73:7,24 122:5 150:2 marie 12:2,3 marietta 4:9 20:3 86:9 marine 19:5 mark 24:6 25:13 26:2,4,10 27:8,23 28:4,11,21 30:14 31:13 33:22 34:5 35:2,18 39:22 42:24 43:12 90:24 98:25 149:18 marked 24:10 26:12 27:10 28:17 28:23 29:4,10,16 29:22 30:8,16 31:17 33:18 34:1 34:11 35:3,11,14 35:19 38:7 39:13 39:20 40:7 42:25 43:14 76:4,6 77:6 91:1 99:3 120:7 132:5 136:24 150:7 151:9 158:7 marker 140:24 marking 42:20</p>	<p>married 14:21,22 16:8 18:10 24:3 martin 1:20 5:5,6 6:5 166:1 mary 14:24,25 16:21 material 73:6 74:15 85:14 130:13 materials 8:23 matt 99:1 118:19 118:24 133:10,14 matter 162:20 163:5 164:10 matthew 4:5 134:4 mcbrayer 1:12 29:7 36:10 38:5 40:20,24 41:23 42:23 43:7 47:21 49:4,12 51:25 53:2 54:19 55:16 56:9 58:11 62:8 66:12 68:5,25 70:8 75:4 79:15 79:21 81:1 84:2 99:25 100:7,15 101:5,21 103:23 104:13 105:11 107:7,10 109:25 111:7 118:4 122:6 123:5,15,24 143:6 148:5 152:23 153:3 154:17,18 154:21 155:8,16 mcbrayer's 28:11 28:21 30:3,6,24 31:4,8 32:19 33:24 34:8 38:1 46:17,24 49:21 50:11 53:9,20 58:25 59:18 60:4</p>	<p>61:18 62:5 66:6 66:20 74:15,20,24 75:2,6 80:21 81:5 81:20,23 84:20 86:2 87:4 88:3 89:16,19 90:3,9 92:6,13,16 94:11 96:6 102:1,25 107:4 108:12 111:2 113:21,25 116:21 120:12 121:19 138:25 151:16 153:15 mcclure 16:22 mcdonald's 56:5 mean 20:12,13,17 28:8 73:17 75:15 103:9 113:22 130:18 131:3,8 145:14,17 151:4 160:1 meaning 79:5 meaningful 131:1 means 73:19 125:18 164:5 med 51:1 123:14 media 151:13 154:25 155:4 medicaid 46:25 102:3 109:24 110:1,3,6 140:9 141:3 medical 3:8,9 22:1 30:7 34:17 43:6 48:12,18 49:15 50:6 52:6 53:10 53:15,16,21 54:13 62:9 68:22,22 71:9 76:10 77:10 77:24 78:18 79:11 79:12 80:25 81:12</p>
<p>m</p>			
<p>m 82:6,6 m.d. 1:12 machine 123:22 mad 71:11 magic 140:24 maiden 12:11 mail 48:7 maintained 36:3 154:3 maintaining 162:22 164:11 majoring 19:3 majority 116:25 making 160:8 162:21 167:8,8</p>			

<p>82:20 99:23 100:10,17,20 101:4,10 102:5 107:1,11,14 113:15 115:17,19 116:7 117:20 122:8,20 medications 8:17 meds 113:17 meet 33:1 51:7,17 68:9 78:12 meeting 2:22 8:24 32:10,25 47:7,20 48:6 50:11 55:25 76:21 78:6,8,10,14 79:4 80:3 meetings 122:14 melissa 124:14,15 member 20:2 50:17 members 15:13 21:25 memo 44:25 45:1 45:2 memory 42:8 45:10 99:10 106:17 107:24 128:8 135:12 136:2 137:13 142:15,21 146:11 memos 102:16 mention 134:22 mentioned 42:17 70:25 88:1 129:22 148:3 151:1,15 156:6 merry 148:19 mess 97:3 message 55:22 56:21 63:16 82:15 145:10,18</p>	<p>messages 49:8 met 46:23 53:19 56:4 150:5,11 metal 22:14 129:3 129:5,6 method 87:18 metro 16:12 17:13 155:22 meyer 4:11,12 9:7 26:21,23 138:14 138:19 micah 16:17,17 michael 13:5,5 15:12 michele 6:12 12:2 50:10 60:9 61:3 61:14 120:11 154:4 michelle 1:17 6:7 7:7 12:11 61:6 62:25 106:25 159:19 166:2 michigan 12:19 mid 54:21 middle 12:5,7 16:22 46:3 47:17 miller 1:25 6:1 164:22 miller's 127:6 mind 60:23 67:21 67:23 160:17 mine 32:13 38:22 84:8 86:20 116:7 147:10 minutes 56:23 64:15 75:19 93:2 95:3 misses 19:9 missing 135:14,18 mission 86:14 152:17,24 153:3</p>	<p>missionaries 84:10 missions 86:14 mistake 32:13 mix 93:12 149:17 mom 148:17 monday 52:20 54:22 136:16,18 158:20 money 124:18 month 99:16 months 50:7 65:12 66:9 89:5 99:18 99:19 100:8 moonlighting 153:21 morning 52:20 53:24 56:14 66:2 68:17 69:9 mortgage 18:19 18:20,24 103:11 mother 17:16 51:22 motion 33:4 127:1 motioned 121:25 motions 10:14,15 mouth 57:8 move 15:21 16:1 111:18 138:22 moved 13:20,21 14:19 16:7 21:14 65:23 moving 135:5 141:21 145:1</p>	<p>50:24 51:22 57:14 59:19,20 60:12,13 60:16,17,22,23 61:3 64:15 65:11 65:19 66:4,5 73:8 76:24 84:9,12 90:8 91:16 102:11 102:22 106:25 118:21 119:6,14 124:14 137:15 151:2 156:12 157:24 named 147:10 names 13:24 15:7 37:8 53:1 124:7 137:7 nasrallah 2:5 4:5,6 9:8 24:16 25:3 26:9 28:16 39:23 42:12 43:4 67:18 67:22 83:15,18 91:5 96:2 99:1 108:4,7 109:6 112:10 114:1,15 119:12,17 120:2 127:10,13,16 129:18,21 131:12 132:20 133:15,16 138:6,12,15,18,20 143:21 149:6 158:6,9,25 159:9 159:12 160:5,25 nasrallah's 118:14 143:18 national 101:23,25 152:4 ne 4:21 166:18 near 72:13 necessarily 153:20 necessary 161:4 167:9</p>
		n	
		<p>n 2:1 4:1 5:1 12:13 13:7 14:25 134:4 name 12:1,5,8,10 12:11 13:4,6 14:6 14:23,24 15:9 17:1,19 18:2,12 23:20 25:14 34:24</p>	

<p>need 8:7 50:12,23 63:12 65:1,4 78:18 160:2,14 needed 52:20 54:5 54:12 57:8 58:24 59:2,4 81:17 90:13 100:14 102:8 108:23 117:5 133:12 negative 113:8 neighbor's 17:18 nervous 54:14 never 63:8,25 64:18 84:7,15 105:7,11 107:15 150:17,25 151:7 151:12 new 16:4,8 17:25 21:2,12 22:13 23:7 148:19 newspaper 23:12 87:25 150:14 niece 104:13 night 12:21,22 15:13 51:7 nine 115:4 141:22 144:16 nodding 120:17 121:12 143:8,11 147:4 nods 8:1 nonprofit 157:7 normal 53:22 north 4:7 16:12,18 17:13 156:19 northeast 16:5 notaries 165:5,9 notarized 7:2 165:9 notary 168:24</p>	<p>note 44:23 106:5 135:25 notebook 11:13 124:6 149:12,19 notebooks 45:20 noted 167:4,5 notes 3:11 11:14 31:9 44:22 45:8,9 45:22,24 57:25 59:12 91:22,24 92:2 98:17 146:4 149:8,21,22 notice 2:11 6:13 24:7,8 notices 101:20 noticing 163:5 november 1:18 6:7 50:6 52:15 54:21,22 58:22 59:5,6 98:16 number 1:5 26:7 26:11 27:1,13 30:2 33:14,15,23 34:6,14 35:22 36:7 37:19 38:3 39:16 40:18 42:1 42:14 60:17 61:7 61:16 62:21 102:12 110:17 111:13,16 114:24 118:15 133:25 142:8 143:19</p> <hr/> <p style="text-align: center;">o</p> <hr/> <p>o 82:6 o'clock 51:6 63:24 69:12 oath 6:25 ob 27:17 33:17 38:6,15 39:17 40:20 42:3,16 152:15 153:15,24</p>	<p>object 96:2 109:6 114:1,6,9,15 objection 114:17 objections 10:17 obligation 162:22 164:11 obtain 74:2 157:3 obtained 29:2 86:20 87:12 obvious 49:2 107:19 obviously 11:17 48:20 54:21 62:14 occasions 74:5 ocean 21:11 ocga 162:8,10 163:7 165:12 167:7 october 58:22 59:9 98:15,24 99:9 105:22 116:14 120:6 134:20 136:10,17 142:23 145:18 odd 50:10 offered 52:18 office 1:20 6:4 18:20 27:21 30:24 31:4,8 32:19 36:10 38:1 39:18 39:19 44:25 45:2 46:17 48:7,8 50:11 52:6 53:20 53:23 54:2,12,19 55:7 58:25 60:25 61:18 62:5,10 66:6,11,20 67:11 67:16 68:12 73:3 73:18 74:15,20,24 75:2,6 76:12 80:21 81:20,23</p>	<p>84:20 85:19 87:7 87:10,11 88:3 89:17,20 90:3,10 92:7,13,16 100:11 100:12,23 102:2 102:16 103:1 104:12,24 107:4 108:12 111:2 113:21,25 116:21 116:25 117:2 120:12 121:20 123:4 127:6 139:1 147:21 148:8 151:16 153:24 159:15,16 166:8 officer 64:11 90:5 164:18 officers 150:23 offices 21:23 78:19 80:24,25 166:3 oh 13:20 19:6 61:21 131:9 149:10,23 154:9 156:1 okay 7:20 8:2,13 8:14,16 9:16 11:20,23 14:8 15:1 16:11,20 18:4,6 21:5 23:25 24:1 25:1,11,15 27:23 32:21 34:4 35:2 36:3,8,13,21 37:2,5 42:10,13 44:8 45:17,19 46:1,2 53:25 54:17 56:12 58:4 59:7 60:18 61:24 63:4 67:4 69:15 70:20 71:25 73:11 74:3,8 76:5 77:16 78:5 80:12 83:19</p>
---	--	--	--

86:22 88:1,6 90:2 90:24 91:8,13,20 92:6 94:14,18 96:8,12,22 97:13 98:4,9,19,21 99:7 99:15 101:14 103:5 105:13 106:7,16,19 108:3 111:24 118:9 119:16 120:5,8,14 122:11,22 123:8 124:21 125:4 127:14 128:25 129:17 132:20,25 133:3,8,19 134:1 135:5,19 137:12 140:8 141:15,21 142:1,5,7,15,21 143:3,14,22 144:4 144:23 145:4,16 146:6,10 147:7 148:24 149:8 150:3,12,20,25 151:4,7,12,15 152:8,13 155:19 156:10 157:1 158:2 159:4,12 160:3,10,11,15,24 161:6 old 14:2,13,15 16:14 older 16:13 oldest 14:1 18:1 olens 33:1,3 78:9 once 71:16 74:5,5 74:6 127:25 143:2 ones 95:6 96:14 119:2,19,25 online 10:1,5,19 10:23 11:9	opaque 93:15 130:24 open 50:7 55:17 55:17 57:2 64:22 70:1 80:25 95:17 95:21,23,24,24 130:18,19,20 132:21,22 157:3 157:14,19 161:1 opened 94:3,15,23 94:23 96:25 operating 79:4 opinion 78:12 117:25 opinions 154:15 155:20,21 opportunity 161:3 opposition 38:5 option 159:13 oral 6:8 order 10:15 25:8 25:10 26:16 90:11 98:5,20 116:17 134:21 135:24 ordering 102:5 163:22 orders 10:16 organization 20:3 107:9 124:20 157:2 organizations 20:9 20:10 organize 153:12 organized 26:6 132:15 organizer 152:2 orient 44:6 original 10:11,13 24:12 26:14 27:12 28:19,25 29:6,12 29:18 30:1,10,18	31:19 34:3,13 35:5,21 40:9 43:2 43:16 46:13,13 91:3 97:24 99:5 150:9 originally 9:13 originals 159:15 160:19 outside 19:1 23:1 23:5 27:24 30:25 31:22 34:8 39:18 40:4 74:15,20 89:16,19 96:12,18 124:12 158:19 overfilled 96:17 overflowing 95:7 95:11 129:10 oversight 79:8 owned 105:12 152:22,23	135:18,20 139:21 140:2,2,5,7,8,10 140:12,15,16,22 141:14 142:5 144:15 145:5,6,9 147:1 154:4,17 156:11,25 167:11 167:14,17,20,23 168:1,4,7,10,13,16 pages 10:16 31:6 33:23 39:4 91:22 92:1 121:1 139:2 141:22 142:8 145:2 146:24 151:1,10 154:14 154:23 167:9 paid 22:17 23:6 52:2 139:12 141:3 pamphlet 38:8 pamphlets 38:4,10 pap 139:9 140:19 144:20 paper 52:21 54:25 55:1 60:14 91:11 94:12 97:8 159:23 159:25 papers 94:20 103:18 139:4 paperwork 60:20 139:24 paragraph 121:6 122:18 paralegal 158:18 paralegals 21:22 paramedic 19:13 19:13,16,20 paraphrasing 122:24 parents 84:10 park 22:13 23:10 87:11
		p	
		p 4:1,1 5:1,1 17:6 108:6 p.c. 5:6 packet 30:12,13 30:19 31:13 32:5 32:16 47:8,16 65:14,16 66:13 76:17 97:20 118:12 141:23 packets 76:4,5 132:5 136:24 137:10 page 2:3,10 3:2 28:5 38:20 41:1,8 106:8,10 111:25 112:6,7,17,24 113:19 114:20 120:10,25 122:19 126:5 135:7,14,15 135:15,15,16,16	

<p>parking 63:4 69:8 93:2 110:14 111:9 111:20 parkway 4:7 part 19:12 38:4,7 39:14,20 41:8 58:17 80:6 88:11 127:7 132:22 161:3 particular 25:10 95:6 156:22 parties 127:5 163:9,22 164:18 165:13,14 parts 102:2 party 22:20 162:24 163:9 164:13 165:13 pass 75:18 134:3 passed 17:2 23:25 38:10 62:20 password 163:19 163:21 pat 73:2 89:9 patient 27:15 28:12 30:5,13 31:3 33:16,19 34:16 35:12 36:12 47:2,10 49:6 51:14 57:7 61:11 64:8 65:11 70:19 75:24 76:6,19 77:2 80:1,7 81:25 84:21 86:25 87:3 87:9,23 91:23 92:17 94:22 100:14 101:16,18 107:13 109:21,25 110:12 112:3 113:1,12 115:11 118:17 123:25</p>	<p>124:1,3 131:7,9 133:20 134:25 135:5 138:14 140:3,22 141:3,22 144:9 145:2 157:20 patient's 29:19 62:6 118:21 151:13 patients 30:25 33:24,25 34:20 38:18 52:5 59:18 60:2,21 66:23,25 67:10 77:13,20 78:21 100:15 106:21 108:10 109:4 111:1 113:5 116:16,17,23,24 117:15,17,25 118:2 119:25 120:3 136:8,12,16 136:19 137:2,4 139:25 142:18 150:21 paul 20:7 paulding 12:23 16:18 pause 91:15,17 129:20 pay 10:7 102:2 141:1 paying 102:1 pays 113:12 pc 39:17 40:20 pd 38:8 39:14 peachtree 4:21 166:18 pediatrics 104:25 105:5 pending 112:11</p>	<p>people 8:5 24:2 38:23 39:10 41:5 41:8 57:5 69:11 72:3 75:11 82:17 88:17 103:13 109:16 111:8 119:16 148:4 151:1,4 152:5 157:14,16 perform 155:22 performed 85:23 performing 153:3 153:24 performs 86:8 period 52:14 88:25 89:5,13 166:11 permit 88:8 person 25:4 27:3 31:10 37:11 47:12 49:18 56:1,4,22 61:6 62:14 68:2,4 72:22 73:5 76:11 76:22 79:11 87:12 89:21 99:24 106:22 110:13 148:6 156:23 157:12 person's 110:16 personal 11:8 37:11 45:9 64:25 102:9 103:13 104:6 108:19,21 154:4 personally 71:15 74:4,18,22,23 84:16 85:25 86:2 88:2 89:14 92:14 92:17 121:22 122:4</p>	<p>persons 90:6 pertained 33:5 pertinent 97:6 pharmacy 66:6 phone 3:3 35:16 36:4,5,9,11,15 37:7,11,19,24 41:15,16,22 42:6 50:8 51:9,19 52:5 52:24 55:14,20 57:13 59:17 60:7 60:17 61:7,16,20 62:3,7,21,23 64:2 64:8 66:23 84:13 84:16 102:11 105:17 110:17 111:13 116:19 136:11 141:20 148:7,12,13 150:2 159:2 photograph 3:4,5 3:6 photographs 2:24 34:6,7 39:16 40:14,18 41:7 53:13 93:3 photos 76:18 physical 153:23 pick 59:4 72:24 111:18 112:3 160:20 picture 65:15 120:12 pictures 31:21 32:4 39:9 40:4,24 41:10,13,21 47:10 48:11 53:9 piece 22:14 52:21 54:25 55:1 60:14 128:3 130:5</p>
--	---	---	--

<p>piedmont 85:20 153:22</p> <p>pile 159:3</p> <p>pink 70:9,11,13 94:11 131:2,4,6,6 131:8,18,18,21,23</p> <p>pizza 23:11</p> <p>place 23:11 71:9 115:13 124:21 163:6</p> <p>places 53:3 128:9</p> <p>plaintiff 1:10 4:4 22:8 27:4</p> <p>plaintiffs 27:3,8 33:21 35:24 36:9 37:8 44:10 91:7 143:16 151:5</p> <p>planned 83:10</p> <p>planning 23:18 35:1 156:14</p> <p>plastic 130:3,13 132:22,25</p> <p>please 7:5 12:1 62:17 64:10 78:12 114:8 134:3 166:8 166:9,16 167:9,9</p> <p>pm 151:22 161:10</p> <p>point 49:14 55:13 58:4 81:8,12 83:8 83:13 114:14 120:20 123:21</p> <p>pointing 58:10</p> <p>police 30:20 38:14 59:21,23,24 61:25 63:4,9,10,14,17 64:2,16,18,19,21 88:8,21 89:3,8 90:5,10</p> <p>porch 72:8,10</p> <p>position 33:2 102:12</p>	<p>possess 39:17 40:19,23 77:1 97:24</p> <p>possession 27:17 33:17 34:17 47:11 59:3 137:5</p> <p>possibility 33:2 66:1 79:21 95:9</p> <p>possible 45:12 57:1 88:21 115:24 116:15,18 117:3 118:13 120:11 127:4 137:7 143:17</p> <p>possibly 9:10</p> <p>posted 39:1,3 41:10 151:7 155:12</p> <p>postings 156:25</p> <p>powder 15:24</p> <p>powell 4:20</p> <p>powers 4:13 63:19</p> <p>practice 6:15 33:25 34:17,21,23 87:14 104:10 125:12 133:13 152:16,17,25 153:8</p> <p>prayer 38:24 88:7 88:11 89:15,25 151:19</p> <p>praying 50:23 75:20</p> <p>pre 110:8</p> <p>pregnancies 114:25 115:1</p> <p>pregnancy 40:16 139:9 140:19 144:20 147:2</p> <p>pregnant 72:12 113:6</p>	<p>preparation 9:4</p> <p>prepare 8:22</p> <p>preparing 47:25 78:6,15</p> <p>prescription 65:19 66:3,7</p> <p>presence 151:20</p> <p>present 35:17 72:5 74:13 105:3</p> <p>presentation 32:14 47:25 48:10</p> <p>press 155:10</p> <p>pretty 10:18 36:25 46:15 150:10</p> <p>previously 85:17 121:10 133:21</p> <p>prices 113:11,13</p> <p>primary 79:6 141:13</p> <p>printed 10:4 44:3 154:11</p> <p>printout 134:21</p> <p>prior 15:22 37:12 37:25 40:19 42:15 42:23 56:1 72:3 86:18 88:10,11,19 89:2 144:8</p> <p>private 78:19</p> <p>pro 17:23 20:10 50:20 74:9 86:14 86:19 154:15 155:4,20</p> <p>probably 8:14 10:18 22:11 23:7 36:25 39:7 40:13 44:16 45:15 48:24 50:5 54:2 56:14 58:3 59:17 63:7 70:15 73:9 81:4 82:15 85:9 86:19 88:7 89:23 96:22</p>	<p>96:25 98:14 105:15,15 108:17 113:2 118:2,20,23 119:18,21 120:17 120:18 121:17,18 129:9 130:20 132:24 134:12 136:22 143:20 146:19 151:22 158:3</p> <p>problem 63:20 64:3,7</p> <p>procedure 6:4 108:14 110:25 116:3,4 167:7</p> <p>proceeding 163:12 163:20 164:8,17 165:10</p> <p>proceedings 6:9 162:18</p> <p>process 7:2,16 166:8</p> <p>produced 163:12 165:4,8</p> <p>production 165:4 165:9,9</p> <p>professional 162:23 164:12</p> <p>prohibited 163:7 165:12</p> <p>prohibitions 162:11</p> <p>project 156:4</p> <p>pronounce 102:21</p> <p>proper 49:18</p> <p>protect 85:15</p> <p>protected 163:19 163:21</p> <p>protest 38:5,17 89:16,21 90:4 154:3</p>
--	--	--	--

<p>protested 88:20 89:15</p> <p>protesters 63:20 63:23 64:3,7</p> <p>protesting 75:11 151:16</p> <p>protests 88:3</p> <p>provera 144:19 147:2</p> <p>proves 66:10</p> <p>provide 127:6 163:4</p> <p>provided 10:24 26:9 30:25 32:17 33:18,20 40:14 91:5 92:7 99:1 118:14 161:2</p> <p>provides 166:8</p> <p>public 150:18 168:24</p> <p>publish 150:13</p> <p>pull 129:4 130:4 130:10,12</p> <p>punishment 101:5</p> <p>purposes 6:14</p> <p>pursuant 5:22 6:3 6:12 167:6</p> <p>put 8:23 40:2,25 41:3 48:22 62:9 72:25 82:25 83:16 93:1,21 110:13 113:5,7 123:19 128:4 132:11,13 147:13</p> <p>putting 81:21</p> <p>puzzle 128:3</p>	<p>questions 8:19 11:21 21:6 24:25 91:19 92:21 127:13 158:4 163:13 164:4 165:6</p> <p>quit 52:13 83:10 100:2 111:15 123:3,11 124:18 125:7</p> <p>quite 23:15 24:21 112:22 124:8 156:19</p>	<p>reason 46:23 47:18 99:21 118:25 119:6 121:22 137:25 153:17 167:13,16 167:19,22,25 168:3,6,9,12,15,18</p> <p>reasons 111:6 138:8 167:8</p> <p>recall 103:19 133:6 146:13</p> <p>recanted 55:9</p> <p>receipt 59:10 70:14 101:19 112:23 131:7 140:17 144:17</p> <p>receipts 28:22 131:23</p> <p>received 21:15,18 43:5 48:6 74:9</p> <p>receives 163:9 165:13</p> <p>recess 43:23 126:17</p> <p>recognize 60:21 91:16 119:5</p> <p>recognized 81:2</p> <p>recollection 105:20 142:2</p> <p>recommendation 86:22</p> <p>reconvene 126:25 158:5</p> <p>record 25:21,23 26:1,5 36:11 44:2 126:21 148:7 157:19 158:10 159:2 160:21 162:18,21 163:13 164:7</p>	<p>recorded 36:4,5,8 36:18,20 37:24</p> <p>recording 37:21</p> <p>recordings 35:22 35:25 37:6,10</p> <p>records 3:3,9 10:2 27:15,15,15 29:19 35:16 39:14 44:15 44:20 46:20 47:2 47:10,22 48:1,20 51:13,14 52:6 57:8 58:7,19,24 59:2,15,16 60:3 61:11 62:6 63:18 64:22 67:1,2,11,16 69:7 70:19 71:1,7 71:12 73:25 74:2 75:24 76:6,13,19 76:23 77:2,2,13,18 81:15,25 82:10 83:25 84:21,22 87:3,9 91:4,23 92:3,8,10,14,22 94:22 97:4,9,10,17 97:17,24 98:6 99:17 101:2,17,18 105:23 106:2,6,14 107:1,13 108:21 108:25 109:3,4,8,9 112:8 119:11,23 119:24 120:1,2 123:5 125:8,10,15 133:13 135:6,25 136:8,23 137:1,1,4 137:25 138:14,21 138:23,24 139:7 142:6 143:24 144:2,5,6,7 145:24 145:25 148:9 150:13,17,21 151:8,13 157:3,15</p>
<p>q</p>	<p>r</p>		
<p>question 7:19 8:13 26:18 109:1 112:10 125:23 137:16 144:4</p>	<p>r 4:1 5:1 12:22,22 82:6,6 164:1</p> <p>races 147:20</p> <p>rachell 36:12 67:8 145:2,11 146:18 147:22,23 148:4 148:11</p> <p>rakel 123:10,12 125:9</p> <p>random 25:12</p> <p>reach 129:13</p> <p>reached 148:18</p> <p>read 6:18,24 8:25 9:21 10:3,5,7,18 10:20 11:4 30:11 55:2,6,7 104:17 105:7 144:24 167:2</p> <p>reading 166:6</p> <p>ready 9:17 166:6</p> <p>realized 101:7</p> <p>really 19:8 20:17 23:19 39:8 45:1 50:12 65:4 72:13 122:2 140:10 146:13 150:4 153:19</p>		

<p>157:22,24 recovered 76:13 red 93:14,18 129:11,25 130:4,5 130:10,12,17 refer 121:13 referred 119:10 119:17 refresh 45:10 99:10 142:15 regard 106:16 128:14,21 regarding 30:24 31:1 43:7 80:4 89:10 101:11 117:15 122:15 141:17 regardless 32:16 registered 157:8 registering 109:11 152:3 registration 31:3 109:21 140:3,23 regret 53:3 regular 20:22 regulations 5:23 162:6 related 33:16 34:16 109:23 110:8 165:10 relating 163:20 relationship 162:19 164:9 165:12 relatives 15:2 21:21 religious 89:22 remain 6:25 remaining 161:1 remains 72:9,15 72:18,22 87:23</p>	<p>121:23 122:7 remember 10:10 17:1 18:2 44:13 57:14 59:19,20 60:14 64:15 65:11 72:1 80:7 89:7 102:19,25 103:6 116:12 117:14,14 123:11 136:20 137:18,19 141:17 141:19 143:19 146:19,21 remind 8:2,10 reply 166:9 report 59:21,24 61:25 62:1 63:14 64:11,13,16,18,19 64:22 100:12 162:20 reporter 1:24 5:22 6:2 127:5 158:22 159:7,10,14 160:10,12,17 162:1,9,13 163:15 163:17 165:6,8 reporting 5:24 162:6 163:4 reports 87:25 165:14 repository 163:21 representations 162:2 representative 91:6 represents 165:4,7 request 43:4 64:16 64:22 157:19 165:10,14 requested 64:21 requirement 111:3</p>	<p>research 107:8 157:5 resolved 62:18 respond 8:12 109:1 responded 120:23 120:24 response 24:22,25 25:5 26:7 responses 7:22 responsive 27:19 resulted 78:10 retired 79:1 retrieved 127:18 return 124:3 reusing 123:24 review 127:8 reviewing 45:4 127:20 rh 113:8 rich 17:6 rid 97:7 ridge 29:3 31:1,23 34:9 40:17 50:9 71:14 74:4 75:16 89:17,20 95:2 111:7 152:16 ridiculous 56:19 right 7:15 8:21 11:7 17:4 20:6 24:25 27:1,7 29:15 30:11 31:25 33:13 37:10 39:15 42:1,19 48:19 54:8 56:19 57:20 58:2 59:14 62:2,4 68:8 69:17 70:25 75:18 77:12 78:3 86:19 91:10 92:20 93:9,20 96:20 97:20 98:21 104:4</p>	<p>105:19,24 107:16 112:6 116:9 119:9 121:2,5 128:18,20 133:22 136:1 137:6 140:13,21 144:22 145:1 149:2 rights 100:12,23 101:11 107:17 rip 125:12 130:22 132:21,22 ripped 28:12 30:3 130:18,19,20 132:25 133:1 rmr 1:25 164:22 road 4:13 11:25 63:20 65:13 85:20 146:15 153:22 robertson 4:6 rock 35:1 156:13 rodney 46:4 roman 123:12 room 24:4 43:18 44:11 routine 87:22 rpr 1:25 164:22 rubbermaid 72:11 rude 8:4 rule 10:15 167:6 rules 5:23 6:3 162:5 167:6 run 43:17 152:10 runs 18:20 rutgers 21:10,11 21:13,19</p>
s			
<p>s 1:10,13 4:1,4,18 5:1 12:22 14:9 82:6 108:6 sacrad 88:14</p>			

safety 78:21 salaam 118:10,22 141:23 142:3,22 143:3 144:1,6 sam 33:1,3 78:9 sanders 46:4,10,11 sarah 84:9 saturday 44:17 45:6 69:9 75:9 80:23 85:1 121:8 124:13 132:15 savannah 14:10 19:7,8 save 36:25 119:1,7 saw 69:14,21 80:16,16 81:3 94:10,11 102:4 131:2,4,8 saying 36:17 45:23 48:8 50:9,23 53:23 55:9 57:17 60:21 64:6 66:20 67:19 78:10 82:21 97:16 102:8 119:13 121:14 126:9 133:12,17 137:24 138:8 157:23 says 18:3 28:21 29:1 60:15 64:23 67:9 99:13 110:16 111:12 112:17,24 113:11 114:19,20 115:4,6 118:18,19 132:16 134:2 139:8,11,21 140:23 145:10,13 scanned 146:7,8 scared 50:12,24 55:19	schedule 63:25 151:16,20,25 152:5 scheduled 9:13 school 16:18,18,22 17:4,12 19:11,18 20:25 21:1,2,9 23:10 53:1 60:8 schools 16:9 17:10 scratch 45:18 scribble 45:18 scrubs 80:23 81:3 sealed 93:9,21 129:23 searched 10:1 second 26:18 27:7 48:3 72:9,18,20 82:22 89:10 109:12 113:14 116:19 122:6,16 127:2 152:19 section 162:8 sections 162:10 sedan 85:12,13 see 64:22 70:8,13 70:18 73:23 79:24 80:1,2 81:9 87:5 90:16 100:24 110:16 112:21 120:4 123:4 124:2 125:7 126:4 129:3 129:11,11 130:25 144:22 seen 24:18 56:6 60:23 90:9 103:10 110:9 113:3 139:24 send 87:5 105:23 106:14 120:11 137:2 159:14 160:19 166:16	sending 100:2 sense 62:13,15,16 99:12,14 126:8 sent 36:2 37:22 46:4 66:1 82:19 82:21 86:13 87:12 101:23 105:22 106:2 119:1,7,25 120:2 125:25 133:17 146:2 150:17 sentenced 69:3 sentences 121:9 separate 37:17 113:16 130:6 141:14 separately 40:2 september 15:15 sequence 115:22 seriously 65:2 serve 164:17 service 79:18 services 163:4 165:13 set 35:6 42:21 48:20 49:12 51:18 56:7,9 58:12 62:11 78:8 119:7 setting 62:12 83:13 settled 22:16 seven 29:7 135:21 139:3 140:22 shakes 8:1 shanecky 73:7,24 shared 58:10 sharita 84:8,11 sheet 102:11 113:2 113:10 114:11 145:16	sheets 102:8 sheila 41:19,22 104:11,14 105:6 105:10 152:23 short 43:23 126:17 shot 113:9 147:2 show 91:9 140:6 showed 122:23 147:20 showing 138:21 shows 54:19 shredded 103:20 128:6 shredder 104:15 105:12 shredding 49:5 125:22 shut 57:9 95:22 152:24 153:1 156:18 sided 27:7 sides 95:19,20 sidewalk 38:25 50:9,22 54:15 63:21,23 68:16 75:12 82:17 88:15 89:4 122:1 124:11 sign 6:18 52:21 55:1,4,6,11 127:8 152:6 signature 164:21 166:2,12 168:20 signing 166:6 signs 38:3 89:5 similar 110:10 single 51:22 148:17 site 11:5 40:25 152:4 154:2 155:7 155:24 156:2 157:10
--	--	--	---

sites 155:20 156:10 sitting 24:4 26:23 96:13 103:6 131:24 141:18 situations 157:6 six 22:13,14 29:1 34:14 50:7 52:20 89:5 100:8 113:6 115:6 135:16,20 135:21 139:2,21 140:2,15 151:22 slapped 79:16 slips 70:9,12 small 51:22 smear 139:9 140:19 144:20 smoking 66:10,18 social 154:25 155:3 soft 72:21 solely 163:1 164:14 somebody 51:17 60:15,25 66:10,19 121:25 141:7 somewhat 142:17 son 13:20 22:1 son's 15:5 18:1 45:20 soon 62:19 63:5,6 90:15 sorry 25:14 61:4 67:13,22 70:23 83:15 99:20 101:14 108:7 111:23 114:5 138:6 152:11 sort 8:9 11:7 25:12 26:15 48:25 54:4 57:21 74:19 81:14	83:24 84:21 87:18 89:21 93:11,15 97:6,8 101:5 102:9 117:4 122:11 134:21 140:23 142:3 146:13 148:17,19 157:5 sorting 97:1 sorts 87:23 sound 60:11 sounds 74:8 107:23 125:25 126:7 150:20 spanish 84:10,11 84:12 speak 147:21 speaking 116:16 117:25 125:6 137:18 150:2 speaks 114:2,16 specific 35:12 82:9 107:24 113:21,23 114:13 121:14 137:13 142:1,21 163:8 165:12 specifically 136:21 162:4 spell 12:12 73:8 108:4 spiel 108:1 spirit 69:16 spoke 36:10 62:25 84:7,16 105:16 123:2 125:9 136:6 142:13,17,20,25 spoken 6:17 9:1,7 9:18 145:21 147:9 spot 70:3 115:3 spouse 24:4	springs 15:25 st 20:7 50:17 stack 8:23 25:6 26:9 27:8 60:3 103:20 stacked 103:20 staff 49:21 78:8 102:8 stains 53:10 stand 89:4 standard 125:12 starry 12:21 15:13 start 44:5 52:19 126:4 135:6 started 18:2 48:19 49:2 55:13 56:9 57:5 97:1 98:23 100:9 106:19 155:15 starting 47:22 54:8 136:17 state 35:9 48:4 78:25 79:7 113:23 117:10 123:17 156:22 162:14 stated 164:3 statement 33:3 55:8,10 78:12 104:5,18 167:8 states 15:17 138:25 156:18 157:15,16,22 stay 19:7 159:16 staying 160:8 stepped 55:7 stole 52:6 67:11 148:8 stood 88:6 stop 53:4 153:3 story 58:5,18	straight 151:19,23 street 4:21 40:16 88:16 166:18 strings 130:3 stuck 135:18 stuff 42:20 51:11 54:16 68:4 85:18 160:1,12,13 stunned 93:5 subcontract 163:1 subcontractor 162:15 164:15 submit 157:19,21 submitted 163:14 163:17 165:6,7 subpoena 6:13 24:8,18 subpoenaed 9:12 10:17 subscribed 168:21 substance 9:3,8,19 167:7 sue 118:3 sued 22:14 suffered 117:4 suggested 87:8 suing 111:7 148:5 suite 1:21 4:8,14 4:22 5:8 6:5 summarize 100:25 summer 71:21 summerone 82:3 summerour 82:4 summit 86:3 87:10 153:21 super 140:1 144:18 superior 1:1 10:2 11:4 57:11,11,15 supermarket 23:11
---	--	--	---

<p>supplement 47:15 supplemental 47:10 48:11 65:15 76:16 supplies 102:5 suppose 46:13 113:7 supposed 88:12,13 88:14 100:11 102:17 123:25 147:17 sure 6:19 7:15,18 7:22 18:23 23:15 27:6 32:23 36:25 49:17 52:1 56:23 63:13 64:13,17 65:1,5 67:12 98:17 115:8,21 116:2 117:5 150:10 156:12 surgery 33:6 35:9 79:6 80:4 86:4 116:24 122:16 surgical 78:20,24 79:5 115:18 116:5 surrounding 39:19 suv 85:10,12 swear 7:4 sworn 7:8 168:21</p>	<p>taken 6:12 10:21 34:7 40:12 41:3,5 41:7 51:13 65:2,5 70:16 100:6 107:15 117:19 164:3 takes 115:13 talk 9:16 11:11,21 20:9 37:3 38:17 49:1 50:23 51:8 63:2 76:6 87:15 98:4 118:11 121:7 122:1,19 155:4 talked 7:15 24:20 37:16 56:22,24 141:15 142:22 143:4 146:18 148:11 151:12 talking 8:10 46:16 52:15 56:2 66:13 86:25 111:14 122:20 126:7 130:6 133:3 134:24 139:2 140:1 142:9 143:4 147:7 talks 140:14,18 tallies 101:19 tangent 57:21 58:17 tape 53:11 74:1 97:10,22 148:7 taped 53:11 67:7 97:4,14 151:8 taylor 4:19 tear 149:13 tears 60:1,5 61:12 tech 16:12 17:13 51:1 123:14 telephone 50:2 98:11 106:18</p>	<p>118:15 133:5 142:2 143:18 television 87:25 tell 10:9 11:25 13:16 20:5,24 22:10 23:16 25:17 42:11 44:19 52:11 59:12 62:7 70:15 73:7 90:13 96:20 100:25 106:16 108:10 114:19 115:8 126:5,11 127:23 154:7 telling 51:8 52:5 75:8 96:8 117:14 117:14 148:8 ten 51:6 52:18 79:2 120:24 tenants 101:21 tennessee 87:13 164:25 term 30:23 153:22 155:16 terms 163:1 164:15 terroristic 61:25 63:12 test 139:9 140:19 144:20 147:2 testified 7:9 118:12 143:3 testify 100:3 testimony 1:16 9:4 9:9 167:2,7 text 82:15,19,21 texted 37:18,20 thank 44:8 83:20 131:13 134:3 143:14 161:5 thankful 142:13 142:18 148:6</p>	<p>thanks 120:13 134:4 theirs 69:19 themselves 61:6 thereto 164:5 thick 159:2 thing 47:4 76:15 88:14 90:18 97:8 102:9 139:8 140:14 148:20 things 6:19 11:11 44:7 45:10 46:24 56:6 58:15 81:13 95:16 107:12 122:24 134:23,23 152:11 think 8:7 10:15 17:23 18:3,4,23 19:25 22:12,17 29:13 32:7 38:20 39:9 40:4 43:3 44:20 45:1 46:2 50:4,18 51:5 57:20 58:4,10,21 67:18,19 68:5 70:9,11 73:19,22 76:5,17 77:21 89:24 90:1 91:22 94:8 97:21 99:8 102:8,12 103:9,11 103:14 105:15 109:13,14 114:3 119:16,21 128:13 129:22 130:19 131:23 132:2,3 133:9,16 134:10 134:20 135:13,18 136:16 138:3 139:10,18 144:12 146:17,20,21 147:25 148:10,22</p>
<p>t 12:22 13:5 164:1 164:1 table 8:13 26:24 take 8:6,11 24:8 40:10,11 43:19 45:21 48:9 53:9 53:12 92:24 93:3 102:9,18 118:8 124:22,24 125:24 126:14 143:6</p>	<p>tape 53:11 74:1 97:10,22 148:7 taped 53:11 67:7 97:4,14 151:8 taylor 4:19 tear 149:13 tears 60:1,5 61:12 tech 16:12 17:13 51:1 123:14 telephone 50:2 98:11 106:18</p>	<p>118:12 143:3 testify 100:3 testimony 1:16 9:4 9:9 167:2,7 text 82:15,19,21 texted 37:18,20 thank 44:8 83:20 131:13 134:3 143:14 161:5 thankful 142:13 142:18 148:6</p>	<p>thanks 120:13 134:4 theirs 69:19 themselves 61:6 thereto 164:5 thick 159:2 thing 47:4 76:15 88:14 90:18 97:8 102:9 139:8 140:14 148:20 things 6:19 11:11 44:7 45:10 46:24 56:6 58:15 81:13 95:16 107:12 122:24 134:23,23 152:11 think 8:7 10:15 17:23 18:3,4,23 19:25 22:12,17 29:13 32:7 38:20 39:9 40:4 43:3 44:20 45:1 46:2 50:4,18 51:5 57:20 58:4,10,21 67:18,19 68:5 70:9,11 73:19,22 76:5,17 77:21 89:24 90:1 91:22 94:8 97:21 99:8 102:8,12 103:9,11 103:14 105:15 109:13,14 114:3 119:16,21 128:13 129:22 130:19 131:23 132:2,3 133:9,16 134:10 134:20 135:13,18 136:16 138:3 139:10,18 144:12 146:17,20,21 147:25 148:10,22</p>

<p>153:6 154:6,24 155:23 156:8,9 157:9 thinking 81:14 third 116:19 118:11 141:21 thirty 166:8 thomas 14:7 17:20 110:16 thought 48:19 53:8,12 58:7 69:10,15 71:1 81:4,14 94:10 132:7 159:19 thousand 22:18 thousands 88:17 110:24,24 threat 62:1 63:12 65:10 threatened 52:24 63:16 65:3 135:1 threatening 37:18 three 12:21 27:1 39:24 48:24 63:14 64:1 66:8,24 74:5 91:22 93:2 95:3 99:19 104:2 112:7 112:17 115:22 120:19 125:13 128:1,9 148:23 151:22 threw 62:6 69:16 87:9 94:20 throw 87:22 125:14 throwing 21:5 42:5 46:25 47:1,2 48:1 49:5 69:7 70:19 71:1,12 79:22 80:1,2 81:15,24 82:10</p>	<p>84:21 97:2 107:12 125:21 thrown 47:21 65:24 67:2 81:6,9 97:18 100:22 103:12,17 107:2 thumbing 45:22 tie 129:25 130:5,6 130:9,10,12,17,20 133:1 tied 93:10 129:22 129:24,25 130:21 ties 93:14,18 129:12 tiffany 162:15 163:3 165:1,4,6,11 166:17 till 55:17 time 17:16 19:11 19:12 23:4 32:3 39:8 44:14,21 47:19 51:25 52:2 52:14 58:5 69:4 71:6,18,23 72:12 73:23 74:18 79:3 82:14 83:16 85:8 88:5,24,25 89:12 89:24 98:17 99:14 99:25 102:8 105:16 108:13 111:4 130:16 132:17 143:7 144:8 146:18 152:7 156:24 163:9 165:13 timeline 122:12 times 63:15 71:13 73:20 83:10 89:14 89:20 104:2,3 105:13 110:24 113:16 124:1</p>	<p>125:13 128:1 130:21 134:22 142:25 148:10,13 timing 44:7 99:12 timothy 14:1 18:9 18:18,19 tip 48:22 tipped 121:10,20 title 23:19 today 7:1 8:17,24 9:4,18 11:15 27:5 50:1 61:1 65:11 82:10 96:14 103:6 122:13 131:25 141:18 143:24 149:1,9,25 159:10 today's 139:21 toddlers 17:17 told 14:8 38:14 43:4 46:7 49:24 51:10 52:11,25 53:4 54:1,12 55:11,24 56:15,24 57:11 60:13 61:1 64:2 65:6 75:21 80:16 81:24 83:9 90:2,17 94:8 103:8 104:8,21 105:9 106:18 108:13,15 116:11 116:24 117:16,23 117:24 118:12,16 122:13 123:22 125:11,12 132:20 135:3 143:15 146:17 149:5 top 28:15 86:6 95:5,7,11,13,18 96:10 129:1,9 140:2</p>	<p>topic 47:3 108:19 109:19 topics 155:6 torn 97:17,19 127:22,23,23,24 127:25 128:1,8 total 28:22 45:17 136:19 totality 28:4 touch 56:16 99:22 100:1 training 21:22 22:1 123:22 transcribed 164:5 166:6 transcript 24:12 26:14 27:12 28:19 28:25 29:6,12,18 30:1,10,18 31:19 34:3,13 35:5,21 40:9 43:2,16 91:3 99:5 150:9 161:2 163:11 164:6 165:4,5 167:2 transcription 164:6 transcripts 163:11 163:19 trash 11:23 27:21 29:3,8 31:22 32:4 33:19 34:8 39:21 42:5 44:5,11 45:5 46:21 48:5 58:14 67:17 68:13 69:16 69:18 70:15,16,17 73:16 74:19 76:8 76:14 77:3 80:6 81:6,21 82:11,24 83:1,3 85:16,24 86:3,8,15,20 87:17 87:18 91:6 92:4</p>
--	---	--	---

<p>92:12,23 93:12,12 93:16,21 94:5,10 94:15,23 95:2,4 96:21,25 97:6 101:16 102:14,24 103:3,4,7,10,15,16 103:22 107:2 119:11 129:9 trauma 83:11 treated 117:1 trespass 73:4 trial 138:20 tribble 2:4 4:19 6:11,23 7:4,11 12:9 17:11 24:14 24:17 25:20,25 28:3,9,10 40:1,3 43:19 44:1 67:20 68:8,11 83:17,21 108:6,9 112:12,14 112:16 114:5,11 124:23 125:2,5 126:14,20 127:11 127:14 131:15 135:17,20 138:16 138:22 149:18,20 158:3,7,11,21 159:4,11,13,21 160:3,14,16 161:6 tried 51:19 72:16 73:1 75:1 108:18 trimester 48:3 72:9,18,20,21 82:22 89:10 122:6 122:17 152:19 truck 18:3 true 24:18 83:21 92:8 94:24 99:10 100:25 109:2 122:25 140:15 147:5 151:5,6</p>	<p>163:12 164:7 165:5,7 trunk 85:18 93:1 93:22 94:1 trust 83:9 100:16 truthful 8:18 try 39:24 83:16 97:5 109:18 124:16 132:14 151:20 trying 8:4 18:3 49:17 51:1 56:15 57:24 60:7 67:14 79:19 81:9 100:5 124:19 127:3 143:7 146:21 tuesday 14:20 158:20 turn 90:15 134:23 134:24 turned 49:19 54:17 103:2,3 tv 90:15 twelve 69:12 twenty 14:14,16 127:21 twice 143:2 twist 130:6 twisted 134:23 two 17:17 18:7,15 31:6 33:23 37:23 44:11 62:20 66:24 69:25 75:19 93:2 95:3,10 99:6 104:3,9 111:25 113:16 115:2 120:10,19 122:19 123:2 125:6 127:13,21 130:21 136:5 148:23 149:7</p>	<p>type 7:23 8:1 typed 55:9 tyrone 85:20 u u 82:6,6 uh 120:17 121:12 143:8,11 147:4 ultrasound 82:23 116:4 121:15 123:17 139:9 140:19 ultrasounds 123:15,20 unable 20:23 uncover 157:5 undersigned 167:2 understand 53:22 69:11 125:17 understanding 109:20 111:6 115:12 underwood 40:15 unit 46:6 university 16:16 21:12 unlicensed 48:4 80:4 unsealed 94:5 unsterile 117:7,7 untie 130:17 uploaded 39:11 163:21 upset 100:21 urinalysis 139:10 140:20 144:21 147:3 use 8:14 157:24 158:1 166:9 167:9 usually 69:10,11 109:24 141:14 151:20</p>	<p>v valbuena 1:20 5:5 5:6 6:5,22 12:7 15:10 16:23 17:3 17:6,8 25:16 27:25 28:7 36:7 47:5 67:24 68:2 73:19 95:21 112:13 113:22 114:3,8,9,17 124:21 125:1 126:22 135:13,19 149:16 158:14,17 158:23 159:18,23 160:6,15 166:1 various 11:11 81:13 107:12 verbal 7:22 verbatim 162:21 verdant 15:23,24 veritext 162:16 165:1,4,6,11 166:17 veritext.com. 165:10 version 97:24 vertitext 163:3 vials 47:1,13 victory 153:20 video 42:4,16 videos 42:2,14 vigil 88:7,11 89:25 vigils 38:24 89:15 village 1:21 5:7 6:5 vincent 20:7 violation 100:23 101:12 107:18,19 117:20 118:14 violations 59:1 100:13</p>
--	---	---	---

<p>vip 109:12 visible 129:5,7 visit 80:11 81:9 107:3 109:24 115:5,6 131:7 139:13,14 146:23 146:24 visits 147:18 visualize 94:14,21 voice 61:9,23 63:15,15 voicemail 60:16 61:8 volume 1:15 volunteer 20:21 von 49:19 52:10 55:22 56:1,4,16 57:17 59:11 vs 1:11</p>	<p>wanted 49:9 51:7 51:21 52:17 53:5 83:3,10,11 90:18 107:1,10 108:20 119:22 143:6 150:11 wanting 122:1 wants 28:2 waste 47:2 72:7 watch 53:2 107:9 154:21 155:8 157:1,13,24 watches 17:17 way 12:21,22 15:14 62:2,4 75:16,19 119:6 131:24 138:19 142:9 150:18 153:19 wearing 80:23 web 11:4 40:25 154:2 155:7,19,24 156:2,3,10 157:10 wednesday 70:22 week 52:9 59:15 59:16,16 64:16 65:6 84:25 111:19 127:2 129:10 132:9 136:15,17 142:23 weeks 48:13,23,23 48:24,24 58:18 113:6,6,11 115:4,7 126:25 160:22 weird 69:10 went 10:1 21:1,10 21:10,11 22:14 26:4,5 47:12,18 53:1 54:14 57:25 63:7 70:3,18 71:6 72:5,6,14 73:23,24</p>	<p>74:14 75:21,23 76:21 83:6 84:25 86:3 88:6,12 124:2 132:6,7,17 150:6 west 109:18 154:11 whim 68:14 69:6 whitaker 66:3 76:21,25 77:9,19 124:10 white 34:7 70:9 93:12,13,15 129:11 130:3,24 wife's 14:23 18:12 williams 87:11 winter 71:17 wish 65:21 wishing 148:18 witness 5:4 6:8,18 6:21 7:3,5 16:24 17:4,7,9 43:17 67:23 68:1,9 125:4 138:10 158:13,15,24 159:25 160:11,24 161:3 165:8 witnesses 163:18 wolven 1:17 6:7 6:12,16,24 7:7,12 8:16 12:2,14 13:5 13:22 14:11 22:5 26:5,8,9 33:15 60:10 61:3,6,15 62:25 94:9 97:23 99:8 106:25 114:12 127:6 134:18 152:14 154:4 166:2 wolven5855 119:8</p>	<p>woman 50:24 118:11 143:15 women 12:8 36:4 92:3 101:2,9 107:25 109:5 119:10,13 127:19 138:1 146:3 147:16,19 women's 101:16 137:25 womens 86:3 womentakingba... 155:25 wood 32:15 wooden 69:25 80:17 woods 2:22 15:23 15:24 32:10 woodstock 20:1 word 113:23 128:22 129:23,23 155:10 words 12:21 work 17:15,21 19:1,10 21:22 23:16 50:25 51:2 52:17 54:8,9,19 55:2,4 74:10 107:6,7 115:20 worked 22:13 23:1 23:5,9,10,11 61:1 61:1,14 80:20 86:5 152:23 156:4 working 19:12,22 22:25 53:18 56:9 72:3 83:12 84:18 109:17 123:3 124:16 151:21 152:5 works 17:22 19:25 23:21</p>
w			
<p>w 12:13 13:7 wait 7:18 36:6 99:15 waited 96:22 waiting 110:13 111:4,9 141:8 walk 1:21 5:7 6:5 73:3 111:1 walking 147:18 walls 129:3,5,6 want 8:7,11 19:7 24:14,23 25:13,16 28:1 33:11 44:12 45:13,15 47:14 51:8 55:1 98:4 109:1 110:22 114:6 120:5 124:25 127:11 128:23 150:12 158:11,15,23 159:16,19 160:6</p>			

worry 21:6 24:2 55:3 wrist 79:16 write 154:7 157:18 157:20 writing 33:2 written 11:8 102:16 151:25 wrote 60:13,14 132:8	years 23:2 42:7,22 69:5 78:23 100:18 107:15 148:23 yelled 57:12,18 yellow 131:19 young 18:7 63:11
x	z
x 2:1	z 12:13 13:7
y	
y 12:22 y'all 15:21 yeah 10:5,13 11:13,24 16:7 19:12 22:17 28:9 31:9 32:2 35:7 36:23 37:23 41:19 43:20 45:12,14 58:2 59:23 70:14 73:21 86:17 87:2 87:8 93:4,13 95:15 99:18 102:7 108:13 112:19 118:23 120:18 121:17 123:1 126:10 129:7 130:25 131:11,22 132:1 133:22 134:17 141:2,19 141:25 144:14,17 145:8 147:6 149:11,13 151:17 153:13 154:16 156:1 158:13,24 year 9:10 16:14 21:3 23:17 71:19 148:19	

Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2014. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.