

IN THE STATE COURT OF FULTON COUNTY  
STATE OF GEORGIA

ANTONIO PAYNE, )  
Plaintiff, )  
vs. ) CIVIL ACTION FILE  
AMA GODBY LLC, ) NO. 15EV001072  
Defendant. )

VIDEOTAPED DEPOSITION OF  
TONYA RICHARDSON  
November 4, 2015  
10:09 a.m.  
136 North Fairground Street  
Marietta, Georgia  
  
Lamarra George, CCR-2582

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APPEARANCES OF COUNSEL

1  
2 On behalf of the Plaintiff:  
3 ANTONIO PAYNE  
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13 On behalf of the Defendant:  
14 AMA GODBY LLC  
15 ERICAL MORTON, ESQ.  
16 Hicks, Casey & Morton, P.C.  
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21 Also Present:  
22 Harris Bitman, Videographer  
23  
24  
25

INDEX TO EXHIBITS

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3 A Example of a courtesy officer's 68  
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2015  
  
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original transcript.)

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1 MR. BUTLER: This will be the  
 2 deposition of Ms. Tonya Richardson, taken  
 3 pursuant to Notice in the case of Payne  
 4 against AMA Godby. It's taken pursuant to  
 5 the Civil Practice Act for all purposes  
 6 permitted by the act, including use at  
 7 trial.  
 8 We'll go on video, and then you can  
 9 swear the witness, please.  
 10 MS. MORTON: And we'll reserve  
 11 signature.  
 12 VIDEOGRAPHER: We are now on the  
 13 video record. The time is approximately  
 14 10:09 a.m. on November 4, 2015. The  
 15 witness may now be sworn.  
 16 TONYA RICHARDSON,  
 17 having been first duly sworn, was examined and  
 18 testified as follows:  
 19 MR. BUTLER: Have you ever given a  
 20 deposition before --  
 21 THE WITNESS: I have.  
 22 MR. BUTLER: -- Ms. Richardson?  
 23 Okay. How many times?  
 24 THE WITNESS: Twice.  
 25 MR. BUTLER: When were those times?

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1 THE WITNESS: One was, maybe, over  
 2 10 years ago. I was a witness in a car  
 3 accident.  
 4 MR. BUTLER: Uh-huh. And what about  
 5 the other?  
 6 THE WITNESS: The other, maybe two  
 7 years ago for a property, Vesta Gardens, in  
 8 a alleged resident injury case.  
 9 MR. BUTLER: Okay. Well, you  
 10 probably know some of how this goes then.  
 11 I'll sit here and ask questions and you'll  
 12 sit there and give answers, and eventually  
 13 we'll be finished.  
 14 THE WITNESS: Okay.  
 15 MR. BUTLER: If I ask a question  
 16 that doesn't make sense to you, please let  
 17 me know.  
 18 THE WITNESS: Okay.  
 19 MR. BUTLER: And I'll try to  
 20 rephrase it. Oftentimes, in every  
 21 deposition I've ever seen, at some point,  
 22 the lawyer asks a bad question. I'm sure  
 23 that will happen today. And at some point,  
 24 the witness says "uh-huh" or "huh-uh"  
 25 instead of "yes" or a "no." And then I or

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1 the lawyer for AMA Godby, Ms. Morton, will  
 2 remind you to do a say yes or no. And  
 3 we're not trying to be impolite, it's just  
 4 it helps with the transcript.  
 5 THE WITNESS: Okay.  
 6 EXAMINATION  
 7 BY MR BUTLER:  
 8 **Q All right. State your name for the**  
 9 **record, please.**  
 10 A Tonya Richardson.  
 11 **Q All right. If you need a break at any**  
 12 **time, let me know and we'll take one.**  
 13 **What's your title at -- at your job?**  
 14 A Senior property manager.  
 15 **Q And what properties do you manage?**  
 16 A Currently, Vesta Gardens.  
 17 **Q We're here about a shooting that occurred**  
 18 **on January 18, 2015; did you know that?**  
 19 A Yes.  
 20 **Q At that time, what properties were you**  
 21 **managing?**  
 22 A Vesta Gardens and Sierra Townhomes.  
 23 **Q All right. What -- let's talk about the**  
 24 **time of this shooting, January of 2015. What was**  
 25 **your job description at Sierra Townhomes at that**

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1 **time?**  
 2 A Property manager.  
 3 **Q And what did you do?**  
 4 A I -- I leased, I scheduled maintenance,  
 5 ordered materials for the property, oversaw, you  
 6 know, the day-to-day operations, made bank deposits,  
 7 you know, posted rent. It's almost too -- I mean,  
 8 there's numerous, numerous things that you do on a  
 9 day-to day-basis.  
 10 **Q Okay. I think you were probably**  
 11 **interacting with courtesy officers when courtesy**  
 12 **officers -- officers were at Sierra Townhomes; is**  
 13 **that right?**  
 14 A Yes.  
 15 **Q And then what about at Vesta Gardens, were**  
 16 **-- is your job description about the same?**  
 17 A The same. Yes.  
 18 **Q Okay. Meaning you do the same -- you did**  
 19 **the same things at Vesta Gardens as you were doing at**  
 20 **Sierra Townhomes, right?**  
 21 A Yes.  
 22 **Q Did your duties at both apartment**  
 23 **complexes include working with courtesy officers?**  
 24 A Yes.  
 25 **Q Was there a courtesy officer at Vesta**

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<p>1 <b>Gardens?</b></p> <p>2 A Yes.</p> <p>3 <b>Q On January 18, 2015?</b></p> <p>4 A Yes.</p> <p>5 <b>Q And you also probably had to make</b></p> <p>6 <b>decisions with regard to security at both properties;</b></p> <p>7 <b>is that right?</b></p> <p>8 A I didn't make decisions.</p> <p>9 <b>Q Okay. Were all decisions, with respect to</b></p> <p>10 <b>security, made by Arman Soltani?</b></p> <p>11 A Yes.</p> <p>12 <b>Q Okay. That's for both properties, right?</b></p> <p>13 A Yes.</p> <p>14 <b>Q How long have you worked with Arman --</b></p> <p>15 <b>Arman Soltani?</b></p> <p>16 A Off and on, since 2006.</p> <p>17 <b>Q And that'd be when he and his company, AMA</b></p> <p>18 <b>Godby, acquired Sierra Townhomes, right?</b></p> <p>19 A Yes.</p> <p>20 <b>Q Did you start working with Soltani on</b></p> <p>21 <b>Vesta Gardens as soon as he acquired that property?</b></p> <p>22 A Yes.</p> <p>23 <b>Q And when was that, approximately?</b></p> <p>24 A February 2010.</p> <p>25 <b>Q Okay. I -- we -- as you probably know, we</b></p>	<p>1 A Around April, May of 2007.</p> <p>2 <b>Q And what was the reason?</b></p> <p>3 A Because my agreement was that I was only</p> <p>4 going to stay with Arman during the first eight</p> <p>5 months of him purchasing Sierra Townhomes --</p> <p>6 <b>Q I understand.</b></p> <p>7 A -- from the previous owners. And then I</p> <p>8 went back to work with my previous owners.</p> <p>9 <b>Q I see. So eight months after Arman's</b></p> <p>10 <b>company or Soltani's company purchased Sierra</b></p> <p>11 <b>Townhomes, you went back to work for the people who</b></p> <p>12 <b>owned Sierra Townhomes before he did; is that right?</b></p> <p>13 A Correct. Correct.</p> <p>14 <b>Q And then after that, you went back to work</b></p> <p>15 <b>with Soltani?</b></p> <p>16 A Yes.</p> <p>17 <b>Q Am I saying his name right?</b></p> <p>18 A Yes.</p> <p>19 <b>Q All right. I thought it was Soltani for</b></p> <p>20 <b>the longest time, so I'm probably going to slip back</b></p> <p>21 <b>and forth.</b></p> <p>22 A Okay.</p> <p>23 <b>Q I don't mean nothing by it.</b></p> <p>24 <b>So, you worked at Sierra Townhomes before</b></p> <p>25 <b>AMA Godby even owned it?</b></p>
<p>Page 10</p> <p>1 <b>sat here with Soltani yesterday for a while, and he</b></p> <p>2 <b>answered questions like you're doing today. And I</b></p> <p>3 <b>think I heard that you left for a while and came</b></p> <p>4 <b>back.</b></p> <p>5 A Yes.</p> <p>6 <b>Q Tell me what that was about, if you will.</b></p> <p>7 A I worked for the owners that sold Arman</p> <p>8 Sierra Townhomes. And the agreement was -- is that I</p> <p>9 would stay with him for about eight months, eight to</p> <p>10 nine months, help him get acclimated, get started</p> <p>11 with Sierra Townhomes, which I did. And then I went</p> <p>12 back to work with the other ownership.</p> <p>13 <b>Q The other ownership being Arman Soltani?</b></p> <p>14 A No.</p> <p>15 <b>Q Okay.</b></p> <p>16 A No. Different family. Totally --</p> <p>17 <b>Q Different family.</b></p> <p>18 A -- different family.</p> <p>19 <b>Q I missed something then. So, let's run</b></p> <p>20 <b>this back. When -- when -- when did you leave for a</b></p> <p>21 <b>while working --</b></p> <p>22 A In September --</p> <p>23 <b>Q -- with Soltani?</b></p> <p>24 A -- two thousand -- no. It was 2007.</p> <p>25 <b>Q September 2007 --</b></p>	<p>Page 12</p> <p>1 A Yes.</p> <p>2 <b>Q You must be quite the expert on Sierra</b></p> <p>3 <b>Townhomes.</b></p> <p>4 MS. MORTON: Object to the form.</p> <p>5 You can answer.</p> <p>6 THE WITNESS: I wouldn't say an</p> <p>7 expert, but I'm very familiar.</p> <p>8 <b>Q (By Mr. Butler) Okay. How many years have</b></p> <p>9 <b>you worked in managing apartment complexes?</b></p> <p>10 A 37 years.</p> <p>11 <b>Q 37 years. All right. Where did you</b></p> <p>12 <b>start?</b></p> <p>13 A I started in Savannah, with a small</p> <p>14 private owner when I was 17-years old.</p> <p>15 <b>Q Okay. And that would have been about</b></p> <p>16 <b>1980; is that right?</b></p> <p>17 A '79.</p> <p>18 <b>Q '79. Okay. Did you start out at the</b></p> <p>19 <b>different positions and work your way up to property</b></p> <p>20 <b>manager?</b></p> <p>21 A With this particular --</p> <p>22 <b>Q Or did you start out a 17-year old</b></p> <p>23 <b>property manager?</b></p> <p>24 A No. All I did was collect rent and notify</p> <p>25 this particular owner of any maintenance issues that</p>

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1 residents would report, and he had contractors come  
 2 and do it. And I got free rent.  
 3 **Q Okay. When was the first time you served**  
 4 **as a -- approximately, you may not remember the exact**  
 5 **year, if you do, that's great, but when was the first**  
 6 **time that you worked as a property manager some**  
 7 **place?**  
 8 A 1981.  
 9 **Q Where was that?**  
 10 A In Savannah.  
 11 **Q Same place?**  
 12 A No. With a company called NCHP Property  
 13 Management.  
 14 **Q When did you move to Atlanta?**  
 15 A 1988.  
 16 **Q Have you been a property manager one place**  
 17 **or another or multiple places at the same time since**  
 18 **1981?**  
 19 A Yes.  
 20 **Q What's the largest number of properties**  
 21 **you ever managed at the same time?**  
 22 A 16.  
 23 **Q 16?**  
 24 A Uh-huh. I was regional property manager.  
 25 **Q For -- when and for whom?**

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1 A RGR Management. That was the purpose of  
 2 me moving to Atlanta in 1988.  
 3 **Q How long were you with RGR?**  
 4 A Uh-huh. Yes.  
 5 **Q How long were you with RGR?**  
 6 A 10 years.  
 7 **Q Why did you leave RGR?**  
 8 A The company dissolved. The owner retired,  
 9 he was very old. Sold off the properties and...  
 10 **Q And that would have been 1998 or so, I**  
 11 **guess?**  
 12 A Yes.  
 13 **Q All right. What did you do then?**  
 14 A I went to work form a gentleman by the  
 15 name of Dan Lott. I believe his company was named  
 16 Wire Grass Investments. He had three properties in  
 17 the metro area.  
 18 **Q How long were you and Mr. Lott working**  
 19 **together?**  
 20 A About two years.  
 21 **Q And then around 2000, you must have**  
 22 **changed again. What was next?**  
 23 A I went to work for Harmony Properties.  
 24 **Q And how many properties did Harmony**  
 25 **Properties own?**

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1 A They had about 10 or 12 at that particular  
 2 time.  
 3 **Q How many did you manage?**  
 4 A Three.  
 5 **Q How long with Harmony Properties?**  
 6 A About four or five years.  
 7 **Q So now we're up, almost, to your -- the**  
 8 **start of your time with Arman at Sierra Townhomes, I**  
 9 **think; is that right?**  
 10 A The previous owner, around 2000.  
 11 **Q Who was the previous owner?**  
 12 A Ali Katoot. AOK Properties.  
 13 **Q AOK Properties. When did you start**  
 14 **working with AOK Properties?**  
 15 A In two thou -- 2000.  
 16 **Q How many properties did you manage for**  
 17 **them?**  
 18 A They only had the one.  
 19 **Q Sierra Townhomes?**  
 20 A Uh-huh. Yes.  
 21 **Q Why did you choose to work with Arman**  
 22 **Soltani instead of continuing with AOK Properties?**  
 23 A The previous -- the previous owners, AOK  
 24 Properties, they basically buy properties, distressed  
 25 properties, renovate them, and then sell them. It's

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1 like a -- just a constant thing. It can get very  
 2 stressful. You know, you're constantly in lease-ups  
 3 and then you sell. Then you go to the next one. And  
 4 I wanted to just get on a property, sit, and enjoy  
 5 for a little while.  
 6 **Q Uh-huh.**  
 7 A So, Arman made the offer, and it just  
 8 seemed to be the right time.  
 9 **Q Okay. Do you manage any properties for**  
 10 **Arman other than -- strike that.**  
 11 **Do you manage any properties in connection**  
 12 **with Mr. Soltani, other than Sierra Townhomes or**  
 13 **Vesta Gardens?**  
 14 A I don't manage any others. I help out  
 15 whenever I'm asked.  
 16 **Q I see. When you help out whenever you're**  
 17 **asked, could that be with any property that he's**  
 18 **involved with?**  
 19 A Yes.  
 20 **Q How often does that happen where you're**  
 21 **asked to help out with another property, other than**  
 22 **Sierra Townhomes or Vesta Gardens?**  
 23 A On a weekly basis.  
 24 **Q Really?**  
 25 A Yes.

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1 **Q Multiple times a week, one time a week,**  
 2 **you think?**  
 3 A One or two times a week.  
 4 **Q What kinds of things might you do in**  
 5 **connection with other properties connected with**  
 6 **Mr. Soltani?**  
 7 A I might just have to do something as  
 8 simple as write a letter.  
 9 **Q Uh-huh.**  
 10 A I might have to, maybe, contact some of my  
 11 resources for marketing purposes, you know.  
 12 **Q Uh-huh.**  
 13 A Do fliers or look at a incorrect entry on  
 14 the computer and try to correct it.  
 15 **Q In other words, oversee the other property**  
 16 **managers when necessary?**  
 17 A If I'm asked to do so.  
 18 **Q So it sounds like your work with**  
 19 **properties connected with Soltani, other than Sierra**  
 20 **Townhomes and Vesta Gardens, includes actually**  
 21 **running the property, like the bookkeeping -- keeping**  
 22 **entries and that kind of thing, and also the**  
 23 **marketing side; is that fair?**  
 24 A When I'm asked to do so.  
 25 **Q And you're asked to do so on a weekly**

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1 **basis?**  
 2 A Yes.  
 3 **Q What are the names of other properties**  
 4 **that you've been asked to help out with over your**  
 5 **time with Mr. Soltani other than Vesta Gardens and**  
 6 **Sierra Townhomes?**  
 7 A Hidden Pines.  
 8 **Q Uh-huh.**  
 9 A Harmony Crossroads, Morrow College,  
 10 Huntington Creek, and Cedar Glenn.  
 11 **Q You rattled those off reasonably fast.**  
 12 **You'd mentioned earlier, you used a phrase**  
 13 **a couple of times that you help out on them, quote,**  
 14 **when I'm asked, end quote. Did I copy that down**  
 15 **correctly?**  
 16 A Yes.  
 17 **Q And it would be Arman Soltani who's doing**  
 18 **the asking, correct?**  
 19 A Correct.  
 20 **Q I understand. When you were working at**  
 21 **Sierra Townhomes, who all reported to you?**  
 22 A The leasing staff and maintenance staff.  
 23 **Q Okay. Would that be, basically, everyone**  
 24 **who worked on the property?**  
 25 A Yes.

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1 **Q Other than Soltani?**  
 2 A Yes.  
 3 **Q What about at Vesta Gardens, who reports**  
 4 **to you there, or is it --**  
 5 MS. MORTON: Objection. Relevance.  
 6 MR. BUTLER: -- just that answer?  
 7 MS. MORTON: You can answer.  
 8 THE WITNESS: Well, I -- that's a  
 9 one-person office. It's just myself and a  
 10 maintenance person. So, the maintenance  
 11 person.  
 12 **Q (By Mr. Butler) Okay. I understand. And**  
 13 **who do you report to?**  
 14 A I report to Arman Soltani.  
 15 **Q Anybody else?**  
 16 A No.  
 17 **Q What county do you live in?**  
 18 A Gwinnett.  
 19 **Q All right. As a property manager, is it**  
 20 **important for you and the company that you work for**  
 21 **to keep tenants and their guests safe?**  
 22 MS. MORTON: Object to the form of  
 23 the question. You can answer.  
 24 THE WITNESS: Yes.  
 25 **Q (By Mr. Butler) Is keeping tenants and**

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1 **their guests safe part of the job of the owner of the**  
 2 **property?**  
 3 A Yes.  
 4 **Q Is it Sierra -- or was it Sierra**  
 5 **Townhomes's job to provide a safe environment for the**  
 6 **tenants and their guests?**  
 7 MS. MORTON: Object to the form of  
 8 the question. Calls for a legal  
 9 conclusion. You can answer.  
 10 THE WITNESS: I'm not sure of the  
 11 legal -- you know, I'm not an attorney. I  
 12 don't -- I don't know what's --  
 13 **Q (By Mr. Butler) Sure.**  
 14 A -- legal thing, but, you know. But sure,  
 15 yes.  
 16 **Q Do you believe Antonio Payne is at fault**  
 17 **for getting shot on December 18, 2015?**  
 18 MS. MORTON: Object to the form of  
 19 the question. Calls for a legal conclusion  
 20 and calls for speculation. You can answer.  
 21 THE WITNESS: I don't think anybody  
 22 deserves to be shot.  
 23 **Q (By Mr. Butler) I'm not asking for your**  
 24 **legal opinion, but in your view, is it his fault that**  
 25 **he was shot?**

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1 MS. MORTON: Same objections. You  
 2 can answer.  
 3 THE WITNESS: Like I said, I -- I  
 4 don't think anybody deserves to be shot.  
 5 **Q (By Mr. Butler) Do you know of any reason**  
 6 **to think that it was his fault that he got shot?**  
 7 MS. MORTON: Same objections. You  
 8 can answer.  
 9 THE WITNESS: Based on information  
 10 that we were told, you know, there might  
 11 have been some activity that he was  
 12 involved in that could have contributed to  
 13 it, but I don't know. I was not there.  
 14 **Q (By Mr. Butler) Okay.**  
 15 A I wasn't there. I didn't see anything.  
 16 **Q You don't personally -- you've been told**  
 17 **some things about what I suspect you might think or**  
 18 **say later when I ask you more about it, is illegal**  
 19 **activity. Do I understand that right?**  
 20 A Yes.  
 21 **Q But in terms of your personal**  
 22 **observations, you don't know of anything to suggest**  
 23 **that Mr. Payne was at fault for getting shot?**  
 24 MS. MORTON: Same objections. You  
 25 can answer.

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1 **Q (By Mr. Butler) Is that fair?**  
 2 A That's fair.  
 3 **Q Would you agree that the safety of tenants**  
 4 **and their guests is more important than profit?**  
 5 A Yes.  
 6 **Q Did Arman Soltani or Sierra Townhomes**  
 7 **train employees about security and crime prevention?**  
 8 A I don't know if you could use the word  
 9 "train." We are taught certain procedures, you know,  
 10 that -- how to report any activ -- if there -- if you  
 11 see any suspicious activity, illegal activity, you  
 12 know, what to do. You know, and basically that --  
 13 that is it.  
 14 **Q Okay. So you said report illegal activity**  
 15 **and what to do.**  
 16 A Yes.  
 17 **Q I guess I should ask you this question**  
 18 **first: Who at Sierra Townhomes, who was working**  
 19 **there in January of 2015, was taught to report**  
 20 **illegal activity and what to do?**  
 21 A Well, all maintenance staff are told if  
 22 they see something outside to come and contact the  
 23 office.  
 24 **Q Okay.**  
 25 A To let the office know. And of course we

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1 would contact the police. Same case, if myself or  
 2 any of the office staff sees illegal activity, you  
 3 know, that's right in our face, we're going to call  
 4 the police.  
 5 **Q All right. So, is it fair to say that the**  
 6 **maintenance staff at Sierra Townhomes as well as the**  
 7 **office staff, were taught that if they saw illegal**  
 8 **activity, they should report it and call the police?**  
 9 A Yes.  
 10 **Q Let's do some names. Who was in the -- in**  
 11 **January 2015, who was among the maintenance staff?**  
 12 A David Chicas.  
 13 **Q Uh-huh.**  
 14 A And Pedro Guzman.  
 15 **Q And who was among the office staff?**  
 16 A Joy Ruffin.  
 17 **Q Who was -- you know someone named -- it**  
 18 **looks like Carissa (sic) Castillo or something?**  
 19 A She was there prior to me.  
 20 **Q I understand. Was she still working in**  
 21 **January 2015?**  
 22 A No.  
 23 **Q What specifically -- were there any other**  
 24 **specific steps that folks were trained to do if they**  
 25 **saw a crime, other than notify you and call the**

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1 **police?**  
 2 A I'm not quite understanding what you mean  
 3 by -- let me see. You're -- you're asking what we  
 4 were told to do. I mean, if we saw somebody outside  
 5 with a gun, we're not going to try to intervene.  
 6 Okay. We're -- we're going to call the police.  
 7 **Q It sounds like a wise decision.**  
 8 A If illegal activity was reported to our  
 9 office --  
 10 **Q Uh-huh.**  
 11 A -- you know, residents saying, Hey, we see  
 12 this, we see that going on or whatever, then usually,  
 13 we would -- you know, that would peak our attention  
 14 to that particular area. We have contacted the  
 15 police if someone, you know, said something was  
 16 happening at that particular time, but our courtesy  
 17 officers would be, you know, informed of that  
 18 particular complaint or information, and it would be  
 19 a unit that we would watch.  
 20 **Q All right. Under what conditions do you**  
 21 **tell people you should call the police? And what I**  
 22 **-- let me clean that question up for you a little**  
 23 **bit.**  
 24 **When you're talking to folks who work**  
 25 **under you, or when Mr. Soltani's talking to folks who**

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1 **work under you, such as the maintenance staff and the**  
 2 **office staff, what do you tell them about when it's**  
 3 **appropriate to call the police?**  
 4 MS. MORTON: Object to the extent it  
 5 calls for speculation, but you can answer.  
 6 THE WITNESS: They're told if they  
 7 see illegal activity, one, if it's causing  
 8 damage to the property, if they see  
 9 somebody, of course, trying to break in,  
 10 steal AC units, that type thing, you know,  
 11 causing damage to the property or damage to  
 12 another person or, you know, harm to  
 13 another person, to definitely call 911, you  
 14 know, contact the office.  
 15 **Q (By Mr. Butler) So if it caused property**  
 16 **damage, they are supposed to contact the office and**  
 17 **call 911?**  
 18 A Yes.  
 19 **Q And if --**  
 20 A Well we call 911. The office would call  
 21 911.  
 22 **Q I understand. 911 would be called?**  
 23 A Yes.  
 24 **Q And then if it was harming people or, I**  
 25 **guess, had the possibility of harming people, then it**

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1 **should be reported to the office, which is you, and**  
 2 **911 would be called; is that fair?**  
 3 A Yes.  
 4 **Q I had another question that I was going to**  
 5 **ask you, but I forgot.**  
 6 **Did -- was anyone -- did -- well, did you**  
 7 **or -- I'm going to get to that in a minute. That's**  
 8 **later. We pass notes back and forth a lot.**  
 9 **All right. I've got a -- what was it you**  
 10 **said a minute ago? Oh, AC units. Did y'all have**  
 11 **problems with people breaking into AC units?**  
 12 A There was a period of time it was, you  
 13 know, common in the entire area.  
 14 **Q Was it -- did that happen at Sierra**  
 15 **Townhomes, people trying to break into the AC units**  
 16 **to steal copper or whatever?**  
 17 A Yes.  
 18 **Q I wanted to ask you about some folks.**  
 19 **I've got a sheet of paper from -- that Ms. Morton**  
 20 **sent our office. I think you might have helped with**  
 21 **this. It lists who's who at Sierra Townhomes**  
 22 **basically. And I want to ask you about some of the**  
 23 **people.**  
 24 **Do you remember helping Ms. Morton do the**  
 25 **discovery process?**

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1 A Yes.  
 2 **Q That's where like you would search for**  
 3 **documents and information and put that in writing,**  
 4 **and then it gets sent to us?**  
 5 A Yes.  
 6 **Q Okay. Anyway, I wanted to ask you about**  
 7 **these folks. Cassandra Castillo you said was no**  
 8 **longer working -- did y'all overlap at all?**  
 9 A No. No.  
 10 **Q Who was Latosha Jones?**  
 11 A She was a leasing agent.  
 12 **Q Did you have any problems with her?**  
 13 A No.  
 14 **Q Good, honest working?**  
 15 A Yes.  
 16 MS. MORTON: Object to the form of  
 17 the question.  
 18 **Q (By Mr. Butler) Who is Tiffany Mallory?**  
 19 A Tiffany Mallory was a leasing agent.  
 20 **Q Have any problems with her?**  
 21 A No.  
 22 **Q Good, honest worker?**  
 23 A Yes.  
 24 MS. MORTON: Object to the form of  
 25 the question.

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1 **Q (By Mr. Butler) Angela Sheffield, who is**  
 2 **she?**  
 3 A Leasing agent.  
 4 **Q Any problems with her?**  
 5 A No.  
 6 **Q Good, honest worker.**  
 7 MS. MORTON: Object to the form of  
 8 the question. You can answer.  
 9 THE WITNESS: Yes.  
 10 **Q (By Mr. Butler) Who was Rosa Velasquez?**  
 11 A She was a leasing agent.  
 12 **Q Did you overlap with her?**  
 13 A No.  
 14 **Q Okay. Joy Ruffin, who was that?**  
 15 A Leasing agent.  
 16 **Q Good, honest worker?**  
 17 MS. MORTON: Object to the form of  
 18 the question.  
 19 THE WITNESS: I would say no.  
 20 **Q (By Mr. Butler) Okay. Tell me why you**  
 21 **would say no.**  
 22 A Towards the end of her employment right  
 23 before the sale of Sierra Townhomes, I discovered a  
 24 few discrepancies in some of the accounting that she  
 25 had posted, and, you know, where she had taken a

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1 money order from an application and applied it to  
 2 somebody's rent because she said that she had  
 3 promised them, because she had made an error when  
 4 they moved in, that the unit wasn't ready, that she  
 5 was going to pay this money and she didn't have it.  
 6 And then there was some missing application fees.  
 7 And, you know, I gathered that information and then  
 8 gave it to Mr. Soltani.  
 9 **Q Do you think Ms. Ruffin ran off with the**  
 10 **money?**  
 11 MS. MORTON: Objection. Calls for  
 12 speculation. You can answer if you know.  
 13 THE WITNESS: I -- the money order  
 14 that was posted for the -- on the rent, was  
 15 somebody's else's application fee. And we  
 16 could never find the other application  
 17 fees. And I -- I don't know. I mean, I  
 18 don't know, but you don't process an  
 19 application, pull credit on anyone, until  
 20 you post the application fees. That's  
 21 policy.  
 22 I did phone the applicant, and they  
 23 said they did pay it, but, of course, they  
 24 did not have their stubs because they said  
 25 that she completed the ap -- you know,

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1 filled out the money orders for them. So I  
 2 don't know.  
 3 **Q (By Mr. Butler) Okay.**  
 4 A I turned the information over to  
 5 Mr. Soltani.  
 6 **Q So it sounds like Ms. Ruffin did some**  
 7 **things incorrectly and not in accordance with Sierra**  
 8 **Townhomes' policy?**  
 9 A Correct.  
 10 **Q But as to whether she ran off with the**  
 11 **money yourself, you don't know one way or the other?**  
 12 A I don't know.  
 13 **Q Is that fair?**  
 14 A Yes.  
 15 **Q You said this happened -- I think I wrote**  
 16 **this down right -- toward the end of her employment?**  
 17 A Yes.  
 18 **Q That would be when? Like May 2015, or**  
 19 **April?**  
 20 A Might have been April. Yeah, April.  
 21 **Q Before April of 2015, had you had any**  
 22 **problems with Joy Ruffin?**  
 23 A No.  
 24 **Q Before then, had she been a good, honest**  
 25 **worker?**

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1 MS. MORTON: Object to the form of  
 2 the question. You can answer.  
 3 THE WITNESS: She had been a good  
 4 employee.  
 5 **Q (By Mr. Butler) Okay. Do you know Antonio**  
 6 **Payne?**  
 7 A I came into contact with him one time.  
 8 **Q All right. Tell me about that one time,**  
 9 **please.**  
 10 A It was just that I saw him outside and  
 11 that was when it was explained to me that he was not  
 12 supposed to be on the property.  
 13 **Q Okay. Who explained that to you?**  
 14 A Mr. Soltani.  
 15 **Q All right. What -- when was it that you**  
 16 **saw Mr. Payne outside?**  
 17 A I believe it might have been in December.  
 18 **Q Of 2014?**  
 19 A Yes.  
 20 **Q What exactly, to the best of your memory,**  
 21 **did Mr. Soltani say to you?**  
 22 A We had received complaints about traffic  
 23 going in and out of that particular -- the particular  
 24 apartment, Shawwnita Jeffries' apartment. And that  
 25 residents had stated that, you know -- they told us

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1 that, you know -- they told us that, you know, drugs  
 2 were being sold; that's what they told us. And  
 3 that's when Mr. Soltani explained to me that I needed  
 4 to pull the file, that Mr. Payne was not supposed to  
 5 be on the property. And he had given Ms. Jeffries an  
 6 opportunity to, you know -- before, and had talked to  
 7 her before, and to start the eviction process, which  
 8 I did.  
 9 **Q Okay.**  
 10 A For violation of the lease.  
 11 **Q All right. What residents said that**  
 12 **Mr. Payne was selling drugs?**  
 13 MS. MORTON: Object to the form.  
 14 Calls for speculation. You can answer.  
 15 **Q (By Mr. Butler) Let me ask this: Did I --**  
 16 **I tried to use the same words that you did, but I may**  
 17 **have -- what did you tell me that residents said Mr.**  
 18 **Payne was doing?**  
 19 A Selling drugs.  
 20 **Q Okay. Well I did get it right then.**  
 21 **What residents said that Mr. Payne was**  
 22 **selling drugs?**  
 23 MS. MORTON: Same objection, but you  
 24 can answer.  
 25 THE WITNESS: The resident in



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<p>1 Apartment B-1; I think her last name is Ms. 2 Weems. And I don't remember the name of 3 the other resident on the other side. And 4 then a lady by the name of Valerie Mathis, 5 she was in B-7 or B-9. 6 <b>Q (By Mr. Butler) Uh-huh. Is that it?</b> 7 A Yes. 8 <b>Q You've mentioned a resident on the other</b> 9 <b>side. I guess you meant on the other side of B-2,</b> 10 <b>which was Ms. Jeffries' apartment.</b> 11 A Yes. 12 <b>Q Using my astounding powers of deduction,</b> 13 <b>I'm going to guess that was B-3?</b> 14 A It was either B-3 or B-4. 15 <b>Q Okay. And we're talking about December</b> 16 <b>2014, when the residents were saying these things, I</b> 17 <b>infer; is that right?</b> 18 A I -- I believe it was around December. 19 Yes. 20 <b>Q Okay. Do you know someone who goes by</b> 21 <b>Two-Three?</b> 22 A No. 23 <b>Q Me neither. What was the clientele like</b> 24 <b>at Sierra Townhomes?</b> 25 MS. MORTON: Object to the form.</p>	<p>1 grades. You start with A, which is going to be -- or 2 A plus, which is new construction. An A property 3 might be maybe five years old. And it goes to the 4 age of the property. And most of the properties 5 built up and down Godby Road were built in the late 6 60s early 70s, so they're considered C Class 7 properties. 8 <b>Q Is that -- is C Class properties the</b> 9 <b>bottom of the barrel?</b> 10 A No. Oh, no. 11 <b>Q What's the bottom?</b> 12 A D. 13 <b>Q D. Okay.</b> 14 <b>Did you ever spend the night at Sierra</b> 15 <b>Townhomes?</b> 16 A Back in 2003, I did. 17 <b>Q Why?</b> 18 A Because I was in the process of moving 19 into my home, and so I spent the night in the model 20 waiting until I closed the next day so I could move 21 my things into my home. 22 <b>Q And in the model, that'd be in the</b> 23 <b>apartment that you use to show potential tenants, I</b> 24 <b>guess?</b> 25 A Yes.</p>
<p>1 Vague. You can answer. 2 THE WITNESS: You know, typically, 3 low -- low income family. You know, 4 minimum-wage earning, you know, families. 5 We did have some Section 8 residents. 6 <b>Q (By Mr. Butler) Uh-huh. You've worked at</b> 7 <b>a lot of properties over 37 years.</b> 8 A Yes. 9 <b>Q It sounds like. How, in your personal</b> 10 <b>experience, did the clientele at Sierra Townhomes</b> 11 <b>compare to the other properties you managed?</b> 12 A I had managed spectrums of properties 13 where I had celebrities as residents to, you know, 14 what Sierra Townhomes is considered, you know, C 15 Class properties. You know, I have managed them all. 16 But, you know, it's no different than the clientele 17 at Vesta Gardens, at other communities, you know, up 18 and down Godby Road. It's all the same. 19 <b>Q You said Sierra Townhomes and Vesta</b> 20 <b>Gardens both, I guess --</b> 21 A Yes. 22 <b>Q -- are C Class properties?</b> 23 A Yes. 24 <b>Q What does that mean?</b> 25 A In the real estate world, properties get</p>	<p>1 <b>Q Is that the only night you ever spent at</b> 2 <b>Sierra Townhomes?</b> 3 A Yes. 4 <b>Q What was it like at night?</b> 5 MS. MORTON: Object to the form. 6 Vague. You can answer. 7 THE WITNESS: I don't really recall, 8 but, you know, it was without incident. I 9 mean, I spent the night. 10 <b>Q (By Mr. Butler) Right.</b> 11 A I got up the next morning, closed, and 12 moved into my house. 13 <b>Q I see. What was Sierra Townhomes like at</b> 14 <b>night in January of 2015?</b> 15 A I would not know -- 16 MS. MORTON: Objection. Calls for 17 speculation. 18 <b>Q (By Mr. Butler) Okay.</b> 19 A Because I didn't stay there at night. 20 <b>Q Were there families with children staying</b> 21 <b>there at Sierra Townhomes?</b> 22 A Yes. 23 <b>Q Were there hardworking, trustworthy people</b> 24 <b>living at Sierra Townhomes?</b> 25 A Of course. Yes.</p>

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1     **Q**   And you mentioned there were some folks  
2 staying there on section -- what I call Section 8  
3 vouchers?  
4     A   Yes.  
5     **Q**   Am I using the right term?  
6     A   It's called the Housing Choice Voucher.  
7     **Q**   Housing Choice Voucher. I'll use that.  
8            Would you agree that people staying at  
9 Sierra Townhomes on Housing Choice Vouchers are  
10 deserving of being treated like anyone else?  
11     A   Yes.  
12     **Q**   Would you agree that people staying at  
13 Sierra Townhomes on Housing Choice Vouchers have the  
14 same rights as everybody else?  
15     A   Yes.  
16     **Q**   Would you agree that people staying at  
17 Sierra Townhomes on Housing Choice Vouchers are  
18 getting helped out by the government?  
19     A   Yes, they are.  
20     **Q**   I agree. Would you agree that people  
21 receiving Housing Choice Vouchers are folks who we,  
22 as a society, have decided to help so they can get  
23 back on their feet?  
24           MS. MORTON: Object to the form of  
25 the question. You can answer.

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1           THE WITNESS: That's how the program  
2 is designed.  
3     **Q**   (By Mr. Butler) So yes?  
4     A   Yes.  
5     **Q**   You mentioned a minute ago, you start --  
6 you talked about how Mr. Soltani told you in December  
7 of 2014, that Mr. Payne wasn't supposed to be on the  
8 property.  
9     A   Yes.  
10     **Q**   What's the -- what's the -- who know that?  
11 Strike my previous stuff, and we're going to start  
12 again. New paragraph.  
13           Who know that Mr. Payne wasn't supposed to  
14 be on the property.  
15           MS. MORTON: Object to the form.  
16 Calls for speculation. You can answer.  
17           THE WITNESS: The maintenance staff  
18 knew. The reason that Mr. Soltani informed  
19 me, I did not come back to Sierra Townhomes  
20 until like the third week of October of  
21 2014, to help out. So I was not aware of,  
22 you know, the conversation or had not had  
23 the opportunity to go through and, you  
24 know, in that short of period of time, to,  
25 you know, get briefed on all of that -- you

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1     know, all of that stuff where who can't be  
2 here, this -- this has been a problem or  
3 whatever. So that's why he informed me  
4 that, you know -- once I saw the gentleman,  
5 he saw the gentleman, knew that he was back  
6 on the property. And that's when he  
7 informed me, you know, I had already told  
8 her if he comes back, then she has to go.  
9 So that's when I started the eviction.  
10     **Q**   (By Mr. Butler) So the maintenance staff  
11 knew that Antonio Payne wasn't supposed to be on the  
12 property?  
13     A   Yes. But I do not know if they saw him.  
14     **Q**   Okay. And the rule was: As of December  
15 of 2014, that if Mr. Payne came back, Ms. Jeffries  
16 was going to get evicted?  
17     A   Yes.  
18     **Q**   All right. Did the office staff know that  
19 Mr. Payne wasn't allowed on the property?  
20           MS. MORTON: Objection. Calls for  
21 speculation. You can answer.  
22           THE WITNESS: I -- I don't know if  
23 anyone else knew. I worked with Joy  
24 Ruffin. She was fairly new just, you know,  
25 during -- right before I came back.

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1     **Q**   (By Mr. Butler) Uh-huh.  
2     A   And I don't know if she had been told  
3 that, but after I was told, then I let her know.  
4     **Q**   So in December of 2014, you told Joy  
5 Ruffin that Antonio Payne was not allowed on the  
6 property?  
7     A   Yes.  
8     **Q**   Who told Antonio Payne that he wasn't  
9 allowed on the property?  
10           MS. MORTON: Object to the form.  
11 Calls for speculation. You can answer.  
12           THE WITNESS: The notes in the file,  
13 and I don't recall the date, I -- I just  
14 remember there were some notes in the file  
15 where there had been complaints or where  
16 the courtesy officer, you know, previously,  
17 had seen some activity that was suspicious  
18 with Ms. Jeffries' unit. And so she was  
19 asked to come to the leasing office. Ms.  
20 Jeffries participated with the Georgia  
21 Housing Voucher Program.  
22     **Q**   (By Mr. Butler) Uh-huh.  
23     A   And with that program, each resident is  
24 assigned a case worker that helps them, because  
25 usually the people participating in that program

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1 might have either mental illness or different things  
 2 like that, so they have a case worker. The case  
 3 worker was contacted to come and meet with her and  
 4 Mr. Soltani in the office. And that's where it was  
 5 explained to her, you know, the -- the complaints,  
 6 what had been, you know, seen, and that Mr. Payne was  
 7 living there unauthorized and, you know, was told at  
 8 that particular time, according to the notes, that he  
 9 could not be there.

10 **Q Okay. There's a few things I wanted to**  
 11 **follow up on.**

12 A Okay.

13 **Q I get to wanting to write notes to myself.**

14 A Okay.

15 **Q You mentioned the notes of the courtesy**  
 16 **officer fairly early in your answer, I think.**

17 A Not the notes of the courtesy officer.

18 **Q Okay.**

19 A The notes -- there's a conver --

20 **Q Of a folder --**

21 A There's a conversation sheet in every  
 22 resident folder. And we make notes with certain  
 23 activities. You know, if we've met with somebody, if  
 24 we've told them something. And there was a note in  
 25 her folder -- and like I said, I do not recall the

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1 date --

2 **Q Uh-huh.**

3 A -- where a meeting was held with her case  
 4 worker, which is Mr. Stone, I'm very familiar with  
 5 him, where she was confronted about the -- the  
 6 complaints, what the courtesy officer had seen, and,  
 7 you know, that he could not be there.

8 **Q So it sounds like important conversations**  
 9 **with tenants are recorded in the conversation notes;**  
 10 **is that right?**

11 A Yes.

12 **Q And this conversation about Mr. Payne**  
 13 **being banned from the apartment complex would have**  
 14 **been an important conversation?**

15 A Yes.

16 **Q You mentioned, I think, that there was a**  
 17 **meeting with Shawnnita Jeffries, and Shawnnita**  
 18 **Jeffries' case worker.**

19 A Yes.

20 **Q Is that the right term? There's a meeting**  
 21 **in the offices of Sierra Townhomes with Shawnnita**  
 22 **Jeffries and her case worker and you, I suppose; is**  
 23 **that right?**

24 A No. No. I was not there during that  
 25 particular time. I just read the notes.

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1 **Q I see. Who was in the meeting from Sierra**  
 2 **Townhomes?**

3 A Arman Soltani.

4 **Q Okay. Oh, you call him Soltani too.**

5 A Sometimes. I go back and forth.

6 **Q Me too.**

7 **All right. So, to the best of your**  
 8 **knowledge, and you learned this by reviewing the**  
 9 **records of Sierra Townhomes, there was a meeting in**  
 10 **the office of Sierra Townhomes with Ms. Jeffries, Ms.**  
 11 **Jeffries' case worker, and Arman Soltani; is that**  
 12 **right?**

13 A Yes.

14 **Q And that's where it was announced that**  
 15 **Antonio Payne was not supposed to be on the property?**

16 A Yes.

17 **Q And then according to the conversation**  
 18 **notes, Antonio Payne was then told that he couldn't**  
 19 **be on the property; is that right?**

20 A That is my understanding.

21 **Q All right. Do you have a -- where is that**  
 22 **note saying that Antonio Payne was told that he**  
 23 **couldn't be on the property?**

24 A I don't know if there is a note. All I  
 25 know is Mr. Soltani stated that he gave him a verbal

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1 criminal trespass.

2 **Q I see. So Mr. Soltani himself said to**  
 3 **Antonio Payne, Antonio Payne, you ain't supposed to**  
 4 **be any anymore. Is that right?**

5 A That's what I was told.

6 **Q By Mr. Soltani?**

7 A Yes.

8 **Q Do you know of any police officer ever**  
 9 **speaking -- well, let me clar -- pardon me, here. I**  
 10 **know that you don't know of every example, every time**  
 11 **this may have ever happened in his life, but my**  
 12 **question is: new paragraph, do you personally know,**  
 13 **or have you heard about through someone who worked at**  
 14 **Sierra Townhomes of a meeting or a conversation**  
 15 **between Antonio Payne and a police officer?**

16 MS. MORTON: Object to the form.  
 17 Calls for speculation, and hearsay. You  
 18 can answer.

19 THE WITNESS: No, I don't.

20 **Q (By Mr. Butler) I wanted to ask you some**  
 21 **questions about your expertise -- I wanted to ask you**  
 22 **some questions about your expertise in property**  
 23 **management. Now, some of these questions are**  
 24 **probably going to have obvious answers because I**  
 25 **wrote them before I knew you've been doing this for**

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1 **37 years. But here you go: Are you qualified to**  
 2 **design and implement a security plan?**  
 3 A No.  
 4 **Q Do you know what a security plan is?**  
 5 A Yes, I do.  
 6 **Q Tell me what it is.**  
 7 A A security plan can entail the  
 8 implementation of just day-to-day security practices  
 9 as far as safety. It can entail what to do in case  
 10 of emergencies with hurricanes, natural disasters,  
 11 you know, that kind of thing.  
 12 **Q Sounds like basically a plan to keep**  
 13 **tenants and their guests safe; is that fair --**  
 14 MS. MORTON: Objection to form.  
 15 THE WITNESS: Yes.  
 16 **Q (By Mr. Butler) A security plan is**  
 17 **normally a written document, I think; is that right?**  
 18 A Yes.  
 19 **Q Who -- I was going to ask who trained you,**  
 20 **but it's probably a bunch of people over 37 years,**  
 21 **isn't it?**  
 22 A Yes.  
 23 **Q Have you ever -- you know the National**  
 24 **Apartment Association Certified Apartment Portfolio**  
 25 **Supervisor or a CAPS program?**

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1 A Yes.  
 2 **Q Have you done that?**  
 3 A I have not done the CAPS.  
 4 **Q Okay. Do you know anyone who has?**  
 5 A Yes.  
 6 **Q Has Mr. Soltani done that?**  
 7 A Yes.  
 8 **Q Do you agree that crime in an apartment**  
 9 **complex can be a hazard for tenants and their guests?**  
 10 MS. MORTON: Object to the form of  
 11 the question. You can answer.  
 12 THE WITNESS: Yes.  
 13 **Q (By Mr. Butler) And in fact, excessive**  
 14 **crime would tell you that the property was not safe**  
 15 **enough; is that right?**  
 16 MS. MORTON: Object to the form of  
 17 the question. You can answer.  
 18 THE WITNESS: Can you ask the  
 19 question again?  
 20 **Q (By Mr. Butler) Sure.**  
 21 **Excessive crime on an apartment complex**  
 22 **would be a warning to the apartment complex that the**  
 23 **apartment complex wasn't safe.**  
 24 MS. MORTON: Object to the --  
 25 **Q (By Mr. Butler) Is that true?**

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1 MS. MORTON: -- form of the  
 2 question. You can answer.  
 3 THE WITNESS: I guess that would be  
 4 true.  
 5 **Q (By Mr. Butler) Burglaries and break-ins**  
 6 **mean that there is dangerous activity going on in the**  
 7 **apartment complex; is that true?**  
 8 MS. MORTON: Object to the form.  
 9 You can answer.  
 10 THE WITNESS: Yes.  
 11 **Q (By Mr. Butler) Gunshots in the area would**  
 12 **certainly mean that there is dangerous activities in**  
 13 **the area of the apartment complex; --**  
 14 A Yes.  
 15 **Q -- is that true?**  
 16 A Yes.  
 17 **Q Thank you.**  
 18 **Sometimes, particularly with a smart**  
 19 **witness, you know what I'm going to say. But if you**  
 20 **will allow me to finish the question, although you**  
 21 **know what it's going to be, then that'll make the job**  
 22 **easier for our court reporter.**  
 23 **Do you know what a crime grid is?**  
 24 A Yes.  
 25 **Q Do you know how to get a crime grid?**

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1 A Yes.  
 2 **Q A security plan -- I meant to ask you**  
 3 **this: Is the term, quote, security plan, end quote,**  
 4 **a common term in the industry of managing apartments?**  
 5 A I don't know if it's common.  
 6 **Q This isn't the first time you've heard it**  
 7 **though?**  
 8 A No. No.  
 9 **Q And you said you did know how to get a**  
 10 **crime grid?**  
 11 A Yes.  
 12 **Q How do you do it?**  
 13 A You contact the local precinct in your  
 14 area.  
 15 **Q Sometimes you can use what's called an**  
 16 **Open Records Request; is that right?**  
 17 A Yes.  
 18 **Q You may have another way of doing it.**  
 19 A No. I just normally contact the precinct.  
 20 **Q I see.**  
 21 **Mr. Soltani told us yesterday that his**  
 22 **property managers often obtained crime grids for the**  
 23 **properties; is that right?**  
 24 MS. MORTON: Object to the form.  
 25 Calls for speculation. You can answer.

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1 THE WITNESS: I never -- I mean, I  
 2 have not gotten a crime grid in a number of  
 3 years. I have gotten police reports.  
 4 **Q (By Mr. Butler) What's the point of**  
 5 **getting a crime grid?**  
 6 MS. MORTON: Object to the form.  
 7 Calls for speculation. You can answer.  
 8 THE WITNESS: The information that  
 9 it shows is, you know, what's happening in  
 10 the area.  
 11 **Q (By Mr. Butler) Getting a crime grid would**  
 12 **let you know whether tenants and their guests were in**  
 13 **danger, right?**  
 14 MS. MORTON: Object to the form.  
 15 Calls for speculation --  
 16 THE WITNESS: Sure. Yeah.  
 17 MS. MORTON: -- and lacking in  
 18 foundation.  
 19 **Q (By Mr. Butler) When was the last time,**  
 20 **you or, to your knowledge, anybody else, obtained a**  
 21 **crime grid for Sierra Townhomes?**  
 22 A I really don't recall. It was prior to  
 23 Mr. Soltani owning the property.  
 24 **Q What about for Vesta Gardens, when is the**  
 25 **last time you or, to your knowledge, anyone else,**

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1 **obtained a crime grid for Vesta Gardens?**  
 2 MS. MORTON: Objection. Relevance.  
 3 You can answer.  
 4 THE WITNESS: Around 2010.  
 5 **Q (By Mr. Butler) Why did you get a crime**  
 6 **grid for Vesta Gardens -- well, why who got the crime**  
 7 **grid?**  
 8 A I did.  
 9 **Q And why did you get a crime grid for Vesta**  
 10 **Gardens in 2010?**  
 11 MS. MORTON: Objection. Relevance.  
 12 You can answer.  
 13 THE WITNESS: I was not familiar  
 14 with that particular area of town, so just  
 15 wanted to see what was going on in the  
 16 particular neighborhood to know what to  
 17 look out for.  
 18 **Q (By Mr. Butler) What did you find?**  
 19 MS. MORTON: Objection. Relevance.  
 20 You can answer.  
 21 THE WITNESS: Typical break-ins  
 22 domestic violence, prostitution, drugs.  
 23 **Q (By Mr. Butler) Was that kind of stuff**  
 24 **typical for Sierra Townhomes as well?**  
 25 MS. MORTON: Object to the form.

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1 Calls for speculation. You can answer.  
 2 THE WITNESS: I don't know -- I  
 3 mean, I don't know because I didn't see a  
 4 crime grid from there.  
 5 **Q (By Mr. Butler) All right. What did you**  
 6 **-- what did you or the management at Vesta Gardens do**  
 7 **after getting that crime grid in 2010?**  
 8 MS. MORTON: Object to the form and  
 9 relevance. But you can go ahead and  
 10 answer.  
 11 THE WITNESS: I mean, I -- I used it  
 12 just to know what to look out for, but we  
 13 just kind of cleaned out the property,  
 14 moved -- got everybody out and started all  
 15 over. And just very careful on who we  
 16 moved in.  
 17 **Q (By Mr. Butler) You used it in your**  
 18 **screening of applicants then, I guess.**  
 19 A Yes.  
 20 **Q And you probably told the other staff on**  
 21 **Vesta Gardens of what you've learned in the crime**  
 22 **grid; is that right?**  
 23 A There's no other staff at Vesta Gardens.  
 24 **Q You told me just a maintenance guy.**  
 25 A Yeah, just a maintenance guy.

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1 **Q How big is Vesta Gardens?**  
 2 A 88 units.  
 3 **Q All right. How big was Sierra Townhomes**  
 4 **in January 2015?**  
 5 A 188. No, it's one -- it's 136 or 134.  
 6 **Q 134 rings a bell now that you mention it.**  
 7 **In your capacity as a property manager for**  
 8 **properties owned or that Mr. Soltani was involved --**  
 9 **let me clean this question up.**  
 10 **In your capacity as A property manager for**  
 11 **properties with which Mr. Soltani was involved, did**  
 12 **you ever look at statistics across Metro Atlanta?**  
 13 A I don't recall so.  
 14 **Q Would it be important to understand how**  
 15 **crime in different areas of Metro Atlanta area is**  
 16 **different when you come up with your security plan**  
 17 **for a property?**  
 18 MS. MORTON: Object to the form.  
 19 Calls for speculation. Lacking in  
 20 foundation. You can answer.  
 21 THE WITNESS: I guess it would.  
 22 **Q (By Mr. Butler) You would need more**  
 23 **security in South Fulton, for instance, than you**  
 24 **would in Dunwoody probably?**  
 25 MS. MORTON: Object to the form.

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1 Lack --

2 **Q (By Mr. Butler) You think that's true?**

3 MS. MORTON: Lacking in foundation.

4 THE WITNESS: I wouldn't know, but I

5 hope.

6 **Q (By Mr. Butler) All right. What were**

7 **Mr. Soltani's instructions, insofar as you know, to**

8 **you and other people who worked for him with regard**

9 **to reporting crime?**

10 MS. MORTON: Asked and answered.

11 Objection. Asked and answered.

12 **Q (By Mr. Butler) Is this the same stuff we**

13 **talked about earlier?**

14 A Yes.

15 **Q Okay.**

16 A I mean, you know, just, you know, when you

17 see something that's not right and out of place,

18 you're to report it. You're -- you know we need to

19 know about it.

20 **Q Did you ever know Mr. Soltani to tell**

21 **anyone not to call the police?**

22 A No.

23 **Q Have you ever told anyone not to call the**

24 **police?**

25 A No.

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1 **Q What are some things that an apartment**

2 **complex can do to keep tenants and their guests safe?**

3 MS. MORTON: Object to the form.

4 Lacking in foundation. You can answer.

5 THE WITNESS: We try to inform them

6 at move-in of safety tips. You know, keep

7 your doors locked, windows locked, cars

8 locked. Don't keep items in your car

9 that's, you know, out in the open. You

10 know, if door locks and windows or not --

11 or door knobs are not working properly,

12 contact the leasing office immediately.

13 You know, be aware of your surroundings.

14 We always tell them to call 911 first, and

15 then to contact the leasing office.

16 **Q (By Mr. Butler) The leasing office serves**

17 **as sort of the center for the interaction between the**

18 **ownership of Sierra Townhomes and the tenants and**

19 **guests at Sierra Townhomes; is that fair?**

20 A Yes.

21 **Q You've mentioned contact the leasing**

22 **office if the door knobs weren't working. Did I get**

23 **that right?**

24 A Yes.

25 **Q So if there was a safety problem, tenants**

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1 **at Sierra Townhomes were supposed to contact the**

2 **leasing office to get that fixed; is that fair?**

3 A Correct.

4 **Q Do you agree that the installation of**

5 **cameras on the property can prevent crime?**

6 A Are you asking me, personally?

7 **Q Yeah. What your opinion is.**

8 A I don't think it stops crime.

9 **Q Do you think it can help to deter crime?**

10 MS. MORTON: Object to the form.

11 Lacking foundation. Dealing with a lay

12 witness, but you can answer to the extent

13 you know.

14 THE WITNESS: If you're asking me

15 personally, no.

16 **Q (By Mr. Butler) Okay. And when I say**

17 **deter crime -- all this goes in front of a jury**

18 **eventually, so we'll make sure all the words are**

19 **clear.**

20 **When I say "deter crime," I mean it would**

21 **make people think twice or hesitate before committing**

22 **a crime. Is that what you understood -- what you**

23 **understood me to mean?**

24 A Yes.

25 **Q What about having gates on the entrances.**

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1 **In your view, would that deter crime?**

2 A No.

3 MS. MORTON: Object to form. You

4 can answer.

5 **Q (By Mr. Butler) What about having security**

6 **guards as opposed to courtesy officers, would that**

7 **deter crime in your opinion?**

8 MS. MORTON: Same objection. Lay

9 witness. Lacking in foundation, but you

10 can answer.

11 THE WITNESS: I -- I don't think so.

12 **Q (By Mr. Butler) What about having more**

13 **than one courtesy officer, would that deter crime?**

14 MS. MORTON: Same objection.

15 THE WITNESS: I don't think so.

16 **Q (By Mr. Butler) What about having at least**

17 **one security officer, does that deter crime?**

18 MS. MORTON: Same objection.

19 THE WITNESS: No.

20 **Q (By Mr. Butler) What about having lights**

21 **on at night, would that deter crime?**

22 MS. MORTON: Same objection.

23 THE WITNESS: No. It's important,

24 but it doesn't deter.

25 **Q (By Mr. Butler) Why is it important?**

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1 A You want it to be well lit.  
 2 **Q Why do you want it to be well lit?**  
 3 A Just for visibility.  
 4 **Q Why is visibility important?**  
 5 A Visibility is important for persons coming  
 6 home at night.  
 7 **Q And why do people come at home at night --**  
 8 **what I think we're getting at here is that if the**  
 9 **place is well lit, there's likely to be crime there.**  
 10 **Isn't that true?**  
 11 MS. MORTON: Object to the form.  
 12 Calls for speculation. Lacking in --  
 13 THE WITNESS: I guess it can --  
 14 MS. MORTON: -- foundation. Make  
 15 sure you let me get it all out before you  
 16 go ahead, but you can go ahead.  
 17 THE WITNESS: I guess it can help.  
 18 **Q (By Mr. Butler) What about putting out**  
 19 **signs that cameras are present, can that help deter**  
 20 **crime?**  
 21 MS. MORTON: Same objection. You  
 22 can answer.  
 23 THE WITNESS: I don't think so.  
 24 **Q (By Mr. Butler) What about checking IDs of**  
 25 **people who come and go at a guard station, could that**

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1 **help defer crime?**  
 2 MS. MORTON: Same objections. You  
 3 can answer.  
 4 THE WITNESS: I don't know if it  
 5 helps.  
 6 **Q (By Mr. Butler) What about having**  
 7 **peepholes in doors, would that help tenants at least**  
 8 **avoid crime because they could see who is coming?**  
 9 MS. MORTON: Calls for speculation.  
 10 You can answer --  
 11 THE WITNESS: I don't know.  
 12 **Q (By Mr. Butler) What, in your view, can an**  
 13 **apartment complex do to deter crime?**  
 14 MS. MORTON: Same objections. You  
 15 can answer.  
 16 THE WITNESS: Just in my experience,  
 17 you do the best you can to, you know,  
 18 screen residents very well, and then when  
 19 you see things out of the ordinary or  
 20 things that, you know, don't seem right or  
 21 suspicious activity, then you watch that  
 22 particular area and you deal with, you  
 23 know, the -- the particular problems.  
 24 **Q (By Mr. Butler) So like reporting?**  
 25 A Yes.

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1 **Q So other than screening tenants or**  
 2 **reporting crimes, you don't think that there's**  
 3 **anything else an apartment can do to deter crime; is**  
 4 **that right?**  
 5 A There are other things.  
 6 **Q Like what?**  
 7 A I'm sure that having courtesy officers, it  
 8 -- it is important to have them.  
 9 **Q Because it helps --**  
 10 A But it does not deter.  
 11 **Q What does it -- what does it do?**  
 12 A It gives a presence.  
 13 **Q Uh-huh.**  
 14 A But in my experience, I've worked on  
 15 properties that have had hundreds of thousands of  
 16 dollars spent on security systems and cameras, and  
 17 unless that camera is going to have an arm that  
 18 reaches out and slaps somebody in the face or grabs  
 19 them up and says stop, it does not stop. They don't  
 20 care. They wear hoodies, they cover their face. You  
 21 can't ID -- you can't ID them.  
 22 I've watched a rape on one of our video  
 23 cameras, called the police. I could not identify the  
 24 guy, could not identify him because I couldn't -- you  
 25 know, in all honesty, because, you know, I could not

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1 really tell --  
 2 **Q Uh-huh.**  
 3 A -- the view, you know. I just couldn't  
 4 tell. So it doesn't stop. It did not stop that guy  
 5 from doing that.  
 6 **Q Where was that where the guy did that?**  
 7 A Delmar Lane, Sierra Ridge.  
 8 **Q When?**  
 9 A Been about 10 years ago, 10 or 11 years  
 10 ago.  
 11 **Q Well I'm sorry you had to watch that. I'm**  
 12 **sure that was not fun.**  
 13 A No.  
 14 **Q Now, when I talk about deterring crime, I**  
 15 **don't mean stopping it entirely. I think we both**  
 16 **understand that no government anywhere has yet come**  
 17 **up with a measure to entirely halt crime, but there**  
 18 **are some things, I think, that can slow it down.**  
 19 **What's it -- so maybe I need to ask questions, again,**  
 20 **using a different term. Do you think -- I was trying**  
 21 **to think of what will it might be.**  
 22 **Do you think having courtesy officers can**  
 23 **help to slow crime down?**  
 24 MS. MORTON: Object to form. It  
 25 calls for speculation. Lacking in

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1 foundation. You can answer.  
 2 THE WITNESS: Sure, if they catch  
 3 somebody in the act of -- of, you know,  
 4 doing something.  
 5 **Q (By Mr. Butler) Do you think that gates on**  
 6 **property can help slow crime down?**  
 7 MS. MORTON: Same objections.  
 8 THE WITNESS: In my experience, no.  
 9 **Q (By Mr. Butler) Same with cameras?**  
 10 MS. MORTON: Same objection --  
 11 THE WITNESS: In my experience, no.  
 12 **Q (By Mr. Butler) Okay. My understanding is**  
 13 **that somebody tried to break into the leasing office**  
 14 **at Sierra Townhomes around 2008 or so; is that right?**  
 15 A I don't know.  
 16 **Q Okay.**  
 17 A I don't -- I'm not aware of that.  
 18 **Q When did you come back to Sierra Townhomes**  
 19 **after -- you know, when you -- when you stopped**  
 20 **working with Arman and started again, when did you**  
 21 **start again?**  
 22 A At Sierra Townhomes?  
 23 **Q Yes.**  
 24 A 2014.  
 25 **Q Oh, all right. This would have been**

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1 **during the reign of Ms. Cassandra Castillo, I guess.**  
 2 A She had already left.  
 3 **Q Okay. The break-in, I'm talking about,**  
 4 **would have been back then.**  
 5 **On the leasing office at Sierra Townhomes,**  
 6 **were there fake dummy cameras?**  
 7 A Yes.  
 8 **Q Were there Plexiglass windows?**  
 9 A I don't know.  
 10 **Q Was there an alarm system?**  
 11 A Yes.  
 12 **Q The alarm system would call the police if**  
 13 **it was triggered, right?**  
 14 A Yes.  
 15 **Q If you were standing on one side of the**  
 16 **door in the leasing office, could you see who was on**  
 17 **the other side of the door?**  
 18 A Yes.  
 19 **Q Were there any real cameras on Sierra**  
 20 **Townhomes' property in January 2015?**  
 21 A Not to my knowledge.  
 22 **Q Were there -- you know what, I'm going to**  
 23 **ask you that a little bit later, so.**  
 24 **Was there ever a problem with sliding**  
 25 **glass doors at Sierra Townhomes, leading to**

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1 **break-ins?**  
 2 MS. MORTON: Object to the form.  
 3 Calls for speculation. You can answer if  
 4 you know.  
 5 THE WITNESS: Yes.  
 6 **Q (By Mr. Butler) Tell me about that,**  
 7 **please.**  
 8 A I don't remember the exact month. Could  
 9 have -- could have been December or January. I don't  
 10 remember the exact month. There was an incident  
 11 where a couple of the units that were facing the back  
 12 of the property, so there were no other buildings,  
 13 there were several break-ins. And they went through  
 14 the patio doors. It was a young man who lived on the  
 15 property. We knew who did it, but, you know, that  
 16 happened.  
 17 **Q Yeah. Was -- was that the one where there**  
 18 **was a -- there was a guy using his apartment to hide**  
 19 **stolen property? Does that ring a bell? Maybe -- I**  
 20 **think it might have been a vacant unit actually.**  
 21 A No, it wasn't vacant.  
 22 **Q All right. Well tell me what was going**  
 23 **on. You know better than I do.**  
 24 A There was a gentleman who had an  
 25 unauthorized person living with him. From my

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1 understanding he was in jail, the actual resident was  
 2 in jail. The people going in and out, I guess, was  
 3 -- they were associated with this young boy and some  
 4 other people. And the items that were stolen were  
 5 placed inside his apartment.  
 6 **Q Okay. So the -- so stolen items were**  
 7 **being stored in an apartment that was essentially**  
 8 **vacant because the tenant was incarcerated; is that**  
 9 **right?**  
 10 A Technically and legally, it was not  
 11 vacant.  
 12 **Q Okay. Let me redo it then.**  
 13 **So stolen property was being stored inside**  
 14 **an apartment at Sierra Townhomes by the thieves?**  
 15 A Yes.  
 16 **Q I see. That was in December of 2014 or**  
 17 **January of 2015?**  
 18 A Around there. I can't remember the exact  
 19 dates.  
 20 **Q I wanted to ask you some questions about**  
 21 **Vesta Gardens. Are there any entrances to Vesta**  
 22 **Gardens that do not have working gates?**  
 23 MS. MORTON: Objection. Relevance.  
 24 You can answer.  
 25 THE WITNESS: There -- there are no



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1 gates.

2 **Q (By Mr. Butler) Okay. Are there real**

3 **cameras at Vesta Gardens?**

4 A No.

5 MS. MORTON: Objection. Relevance.

6 **Q (By Mr. Butler) Are there any lights at**

7 **Vesta Gardens that don't work?**

8 MS. MORTON: Objection. Relevance.

9 You can answer.

10 THE WITNESS: Not to my knowledge.

11 **Q (By Mr. Butler) I forgot to ask you this**

12 **earlier: How many days a week -- in January of 2015,**

13 **you were working at Vesta Gardens and Sierra**

14 **Townhomes?**

15 A Yes.

16 **Q How were you dividing your time?**

17 A I was working three days at Sierra.

18 **Q Uh-huh.**

19 A And three days at Vesta.

20 **Q All right. So you six days a week, you**

21 **were working?**

22 A Yes.

23 **Q Do you think Sierra Townhomes could have**

24 **used a full-time property manager?**

25 A Maybe it could have, but Mr. Soltani was

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1 there when I wasn't.

2 **Q Okay. Do you think it would have been**

3 **safer to have a full-time property manager at Sierra**

4 **Townhomes?**

5 MS. MORTON: Object to the form.

6 Calls for speculation. Lacking in

7 foundation.

8 THE WITNESS: I mean, I -- I

9 wouldn't think so. I mean, to me, having

10 the owner there is pretty much the best

11 that you can do.

12 **Q (By Mr. Butler) Okay. We talked about**

13 **courtesy officers earlier. And you had, I take it, a**

14 **good bit of interaction with those folks.**

15 A Yes.

16 **Q All right. In fact, meeting with you was**

17 **a part of the job description, wasn't it?**

18 A Yes.

19 **Q It was biweekly or monthly meetings, I**

20 **think?**

21 A Yes.

22 **Q Which was it?**

23 A At Sierra Townhomes, they -- those

24 particular meetings were held with Mr. Soltani.

25 **Q Okay. So the -- the security -- excuse**

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1 **me. Strike that.**

2 **The courtesy officers at Sierra Townhomes**

3 **met directly with Mr. Soltani?**

4 A Yes. Sierra was kind of his baby, so he

5 -- he always oversaw that.

6 **Q And how -- in what ways did you interact**

7 **with the courtesy officers at Sierra Townhomes?**

8 A They would bring the -- either they would

9 drop their reports in the drop box so they could be

10 viewed, or they would physically bring them in. If

11 there were any questions I had on the report of any

12 notations they had, I would ask.

13 **Q So you -- I didn't mean to cut you off.**

14 A And then, you know, if they had written or

15 issued any citations for violations, then letters

16 were usually generated from the office and they would

17 pick them up later in the day to deliver.

18 **Q All right. You mentioned reports. Are**

19 **those also called Courtesy Officers Activity Logs?**

20 A Yes.

21 **Q All right. And you reviewed those?**

22 A Yes.

23 **Q So if something -- if there's a crime or**

24 **something in a courtesy officer's activity log, you**

25 **would know about it?**

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1 A Yes.

2 **Q I want to show you what I think is an**

3 **example of a courtesy officer's activity log. And**

4 **what I'm -- all I'm going to ask you is whether this**

5 **is an example of one. I've marked it as Plaintiff's**

6 **Exhibit A to your deposition.**

7 **(Exhibit A was marked for**

8 **identification.)**

9 **Q (By Mr. Butler) Is that an example of a**

10 **courtesy officer's activity log from Sierra**

11 **Townhomes?**

12 A Yes.

13 **Q How did you make sure, or, to your**

14 **knowledge, how did Mr. Soltani make sure that the**

15 **people working at Sierra Townhomes reported crime**

16 **when they saw it?**

17 MS. MORTON: Object to the form to

18 the extent it calls for speculation. You

19 can answer.

20 THE WITNESS: It's something you --

21 you can't guarantee. You can hope

22 somebody's going to do their job properly.

23 One of the things that he did was installed

24 -- I might be using the name incorrectly --

25 RFDI System. It's one of the systems where

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1 you have your checkpoints. He installed  
 2 one of those on the property just to make  
 3 sure, to know that the officers were  
 4 hitting all the points on the property,  
 5 making sure that patrols were being done.  
 6 And it gave them a little more  
 7 accountability.  
 8 **Q (By Mr. Butler) Uh-huh.**  
 9 A And -- because over the years, you always  
 10 hear residents state, Oh, I never see the courtesy  
 11 officer, I never see anybody. So, this was a way  
 12 that you try to do something to, you know, at least  
 13 know they're out walking and patrolling. And all you  
 14 can do is hope that they're reporting. You -- I  
 15 can't answer for people's morality.  
 16 **Q You can't answer for people's morality?**  
 17 A Yeah.  
 18 **Q You said folks would complain that they**  
 19 **never saw courtesy officers. Did I get that right?**  
 20 A No. I said that at times, people can say  
 21 that they don't see a courtesy officer.  
 22 **Q When did you hear that?**  
 23 A You hear it periodically.  
 24 **Q At all the properties you've managed?**  
 25 A Yes. All through the years.

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1 **Q Okay. Including Sierra Townhomes and AMA**  
 2 **Godby?**  
 3 A Yes. On occasion.  
 4 **Q Do you remember any specific occasions?**  
 5 A Usually just if something had happened  
 6 and, you know, if somebody was missing something or  
 7 kids were in a fight and there was no courtesy  
 8 officer, but typically our courtesy officers don't  
 9 come on 'till the afternoons, and we try to explain  
 10 that to people, that they're not there usually during  
 11 the day, you know.  
 12 **Q What --**  
 13 A Because -- because all we had was our  
 14 report. But then when the system was put in, then  
 15 you knew where everyone was with the date stamp.  
 16 **Q Tell me a little -- all right. I need to**  
 17 **follow up with a couple of things.**  
 18 **All right. What were the hours of**  
 19 **courtesy officers at Sierra Townhomes?**  
 20 A Usually from the time the office closed,  
 21 they would, you know, start around 6:00, 6:30, and  
 22 patrol periodically, you know, up until the next  
 23 morning. It would depend upon their work schedule.  
 24 Most courtesy officers, you know, don't receive pay,  
 25 they're compensated with a free apartment, and they

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1 have full-time jobs. And we would always try to find  
 2 someone who were -- was available during the evening  
 3 hours when there was no office staff at the property.  
 4 **Q So the office -- the hours of a courtesy**  
 5 **officer at Sierra Townhomes typically started around**  
 6 **five or six in the afternoon?**  
 7 A After the office closed at six.  
 8 **Q And then went until when?**  
 9 A Well, depending on their work schedule.  
 10 If they had a job that they had to go to at 7:00 the  
 11 next morning, they've got to sleep at some point. So  
 12 their last patrol might have been two or three in the  
 13 morning.  
 14 **Q I understand.**  
 15 A But then they're on considered on-call.  
 16 **Q Okay. You mentioned that the Sierra**  
 17 **Townhomes' courtesy officers were compensated by**  
 18 **having a free place to stay at Sierra Townhomes. Did**  
 19 **I get that right?**  
 20 A Yes. A two-bedroom apartment.  
 21 **Q What about at other places you've worked,**  
 22 **have there ever been courtesy officers that were paid**  
 23 **in the traditional way, with money?**  
 24 A Some. And sometimes they'll get a free  
 25 apartment plus additional pay.

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1 **Q Were there ever courtesy officers that**  
 2 **Sierra Townhomes considered who wanted to be actually**  
 3 **-- actually paid instead of just having a free place**  
 4 **to stay?**  
 5 MS. MORTON: Object to the form to  
 6 the extent it calls for speculation. If  
 7 you know, you can answer.  
 8 THE WITNESS: We -- I mean, I am  
 9 aware of at least one officer that received  
 10 additional pay and a free apartment.  
 11 **Q (By Mr. Butler) Who was that?**  
 12 A Troy Armstrong.  
 13 **Q Okay. What is -- is Armstrong -- was**  
 14 **Armstrong still there when you sold the property?**  
 15 A Yes.  
 16 **Q How was he compensated?**  
 17 A He received a --  
 18 MS. MORTON: Objection. Relevance.  
 19 You can answer.  
 20 THE WITNESS: He received a  
 21 two-bedroom apartment.  
 22 **Q (By Mr. Butler) Uh-huh.**  
 23 A And I don't know the particulars about his  
 24 monetary compensation.  
 25 **Q But he got a paycheck too?**

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<p>1 A Yes.</p> <p>2 <b>Q You mentioned earlier something about a</b></p> <p>3 <b>system and data stamps. Tell me what that's about.</b></p> <p>4 A It's -- like I said, I don't know if I'm</p> <p>5 calling the name correctly, it's RFDI System.</p> <p>6 <b>Q Uh-huh.</b></p> <p>7 A It's a handheld device that the officer</p> <p>8 has.</p> <p>9 <b>Q Uh-huh.</b></p> <p>10 A And there are checkpoints throughout the</p> <p>11 property where these sensors, I guess they're called</p> <p>12 sensors, different posts -- you find them a lot in</p> <p>13 highrises -- but you -- he has to go around and he</p> <p>14 has to hit it. And it let's him know -- when it's</p> <p>15 setup, each one of these sensors is assigned, like if</p> <p>16 you know that's behind the A Building or the</p> <p>17 mailboxes or this area or this building or wherever</p> <p>18 it is, and they have to click. Then a report is</p> <p>19 printed out the next morning, and you can look and</p> <p>20 tell the date and the time where an officer was at a</p> <p>21 particular moment.</p> <p>22 <b>Q I see. When did that system get installed</b></p> <p>23 <b>at Sierra Townhomes?</b></p> <p>24 A I don't know the exact date. I know it</p> <p>25 was there in 2014.</p>	<p>1 MR. BUTLER: Okay. I think we're</p> <p>2 about to run out of tape here. We've got</p> <p>3 about a minute and eight seconds. So why</p> <p>4 don't we take a break.</p> <p>5 THE WITNESS: Okay.</p> <p>6 MR. BUTLER: And go change tapes,</p> <p>7 and I'll go visit the men's room if it's</p> <p>8 available yet.</p> <p>9 MS. MORTON: I am told it is, in</p> <p>10 fact, available.</p> <p>11 MR. BUTLER: All right.</p> <p>12 VIDEOGRAPHER: Off the video record.</p> <p>13 The time is 11:24 a.m.</p> <p>14 (Recess was taken.)</p> <p>15 VIDEOGRAPHER: Back on the video</p> <p>16 record with Videotape No. 2. The time is</p> <p>17 11:39 a.m.</p> <p>18 <b>Q (By Mr. Butler) I forgot to ask you this,</b></p> <p>19 <b>Ms. Richardson: Before 2015 and the secure -- strike</b></p> <p>20 <b>that.</b></p> <p>21 <b>Before 2015 and the courtesy officer named</b></p> <p>22 <b>Armstrong, had Sierra Townhomes, to your knowledge,</b></p> <p>23 <b>ever offered to compensate a courtesy officer with a</b></p> <p>24 <b>paycheck in addition to or instead of a free place to</b></p> <p>25 <b>stay?</b></p>
<p>1 <b>Q Uh-huh.</b></p> <p>2 A I don't know if it was before then. You</p> <p>3 would have to ask Mr. Soltani.</p> <p>4 <b>Q Sure. It was installed -- it was</b></p> <p>5 <b>installed either during or before 2014?</b></p> <p>6 A Yes.</p> <p>7 <b>Q And the -- the printouts, it generated a</b></p> <p>8 <b>printout that told you where the officer had been the</b></p> <p>9 <b>night before?</b></p> <p>10 A Yes.</p> <p>11 <b>Q What happened to those printouts?</b></p> <p>12 A Most -- whatever I could find, before we</p> <p>13 sold the property, I gathered those up. And the rest</p> <p>14 of them would be at Sierra Townhomes.</p> <p>15 <b>Q Okay. I see. Where did you put the ones</b></p> <p>16 <b>that you gathered up?</b></p> <p>17 A They would be in a box.</p> <p>18 <b>Q Box where?</b></p> <p>19 A I would have to find out where they stored</p> <p>20 all of those things.</p> <p>21 <b>Q All right. Somewhere in the Soltani</b></p> <p>22 <b>apartment empire, I presume; is that right?</b></p> <p>23 MS. MORTON: Object to the form of</p> <p>24 the question.</p> <p>25 THE WITNESS: Yes.</p>	<p>1 A I am not aware.</p> <p>2 <b>Q You don't know of any time where that</b></p> <p>3 <b>happened?</b></p> <p>4 A I -- I'm not aware of any time. I don't</p> <p>5 know.</p> <p>6 <b>Q A courtesy officer's responsibilities, as</b></p> <p>7 <b>I understand it, go well beyond security; is that</b></p> <p>8 <b>true?</b></p> <p>9 A Somewhat.</p> <p>10 <b>Q Well, let me show you what I'll mark as</b></p> <p>11 <b>Plaintiff's Exhibit B.</b></p> <p>12 <b>(Exhibit B was marked for</b></p> <p>13 <b>identification.)</b></p> <p>14 <b>Q (By Mr. Butler) And I think you'll</b></p> <p>15 <b>recognize this as a Courtesy Officer Agreement. And</b></p> <p>16 <b>I think this is actually with Armstrong. Well it's</b></p> <p>17 <b>with someone. Is that right?</b></p> <p>18 A Yes.</p> <p>19 <b>Q This is a Sierra Townhomes document,</b></p> <p>20 <b>right?</b></p> <p>21 A Yes.</p> <p>22 <b>Q If we look on the third page, you'll see</b></p> <p>23 <b>down there at the very bottom -- we're going to work</b></p> <p>24 <b>-- start at the bottom, then work. If you look at</b></p> <p>25 <b>the very bottom of the third page, you'll see a bold,</b></p>

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1 **italicized sentence. And it says: quote, Please**  
 2 **note you are a courtesy officer, thus your role and**  
 3 **tasks goes beyond that of a security officer.**  
 4 **Did I read that right?**  
 5 A Yes.  
 6 **Q I'll ask you to highlight that, if you**  
 7 **will.**  
 8 A (Witness complies.)  
 9 **Q All right. Let's go back to the first**  
 10 **page, and we'll work through it from the top. There**  
 11 **are only a few things I'm going to ask you about it**  
 12 **here.**  
 13 **If we look at the fifth bullet point down,**  
 14 **we find that one of the responsibilities of a**  
 15 **courtesy officer at Sierra Townhomes was to**  
 16 **distribute memos and letters; is that right?**  
 17 A Yes.  
 18 **Q Please highlight that.**  
 19 A (Witness complies.)  
 20 **Q If we go to the eighth bullet down, it**  
 21 **begins with the word "watch," we see that, among**  
 22 **other things, a courtesy officer was supposed to look**  
 23 **out for leaky water pipes, there at the end of the**  
 24 **sentence. Did I read that right?**  
 25 A Yes.

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1 **Q Is that true?**  
 2 A Yes; for any hazards.  
 3 **Q Okay. Highlight that, if you will.**  
 4 A (Witness complies.)  
 5 **Q If we go down here to the 14th bullet**  
 6 **point, it begins with the word "report," we can see**  
 7 **that the courtesy officer is supposed to report**  
 8 **inoperable vehicles. Did I read that right?**  
 9 A Yes.  
 10 **Q Is that accurate?**  
 11 A Yes.  
 12 **Q Highlight it, please.**  
 13 A (Witness complies.)  
 14 **Q And you don't need to highlight these, but**  
 15 **the last two things here talks about conversations**  
 16 **with the property manager; is that right?**  
 17 A Where?  
 18 **Q The last two bullet points.**  
 19 A I didn't bring my glasses in here. Yes.  
 20 **Q Okay. You don't need to highlight it.**  
 21 **It's all right. We'll keep going.**  
 22 **And if we go again to the third page, now**  
 23 **we're on Plaintiff's Exhibit B. We see at the top,**  
 24 **the first written sentence there indicates that a**  
 25 **courtesy officer is supposed to check the mailbox**

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1 **daily for notices or memos that need to go out each**  
 2 **day or night. Did I read that correctly? It's the**  
 3 **first full sentence on the page, near the top --**  
 4 A Oh, yes.  
 5 **Q Highlight that, please.**  
 6 A (Witness complies.)  
 7 **Q If we look at the third bullet point**  
 8 **there, we see that the courtesy officer is supposed**  
 9 **to, among other things, eliminate garbage being put**  
 10 **in dumpsters. Did I read that right?**  
 11 A Yes.  
 12 THE COURT: Object to the form.  
 13 **Q (By Mr. Butler) Highlight that language,**  
 14 **if you will, please.**  
 15 A (Witness complies.)  
 16 **Q If we look at the fifth bullet point down,**  
 17 **that's the second one that begins with the word**  
 18 **"laundry," we see the courtesy officer is supposed to**  
 19 **make sure that the laundry opens on time on weekends.**  
 20 **Is that right?**  
 21 A Yes.  
 22 **Q Highlight that one, if you will.**  
 23 A (Witness complies.)  
 24 **Q And the eighth bullet point down begins**  
 25 **with the word "close." The courtesy officer is**

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1 **supposed to close cable boxes when they're open. Is**  
 2 **that right?**  
 3 A Yes.  
 4 **Q Highlight that, please.**  
 5 A (Witness complies.)  
 6 **Q And this has got your signature at the end**  
 7 **of it, right?**  
 8 A Yes.  
 9 **Q All right. Thank you for your good work**  
 10 **and hand me back my highlighter.**  
 11 **Now, a security officer's job -- a**  
 12 **security officer's job would be more focused than the**  
 13 **job of a courtesy officer, right?**  
 14 MS. MORTON: Object to the form.  
 15 Calls for speculation. Lacking in  
 16 foundation. If you know, you can answer.  
 17 THE WITNESS: I'm not sure what job  
 18 duties they would be required to do.  
 19 **Q (By Mr. Butler) Well, the name, security**  
 20 **officer, as it appears here in the document in front**  
 21 **of you, Plaintiff's Exhibit B, suggests that a**  
 22 **security officer is focused on security. Doesn't**  
 23 **that make sense?**  
 24 MS. MORTON: Object to the form of  
 25 the question. It misstates what's in the

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1 document which speaks for itself. And then  
 2 objections about foundation and... So you  
 3 can answer --  
 4 THE WITNESS: Yeah, it's -- it's  
 5 just all about words. I -- the words are  
 6 "courtesy officer." We've always been told  
 7 to use the term "courtesy officer."  
 8 **Q (By Mr. Butler) The words security officer**  
 9 **appears here too, doesn't it?**  
 10 A It does.  
 11 **Q And doesn't this tell us that the role of**  
 12 **a courtesy officer goes beyond that of a security**  
 13 **officer?**  
 14 A I understand how that's supposed to -- how  
 15 that's meant.  
 16 **Q Doesn't it say that the role of a courtesy**  
 17 **officer goes beyond that of a security officer?**  
 18 A Yes, it does.  
 19 **Q And a security officer would be worried**  
 20 **about security, right?**  
 21 MS. MORTON: Object to the form.  
 22 Calls for speculation. Lacking in  
 23 foundation. You may answer.  
 24 THE WITNESS: I guess it -- I mean,  
 25 I -- a security officer, I guess, might not

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1 have some of these other duties.  
 2 **Q (By Mr. Butler) Because a security officer**  
 3 **would be focused on security, right?**  
 4 A Yes.  
 5 MS. MORTON: Object to the form.  
 6 **Q (By Mr. Butler) I wanted to speak with you**  
 7 **about security measures at Sierra Townhomes. And**  
 8 **we're done with those exhibits.**  
 9 MR. BUTLER: Madam Court Reporter,  
 10 is there a place you want us to put them?  
 11 COURT REPORTER: Yes. Here.  
 12 **Q (By Mr. Butler) How was the security plan**  
 13 **at Sierra Townhomes?**  
 14 A I'm not aware of any written plan.  
 15 **Q To the best of your knowledge, there was**  
 16 **not a written security plan at Sierra Townhomes; is**  
 17 **that true?**  
 18 A To my knowledge, no.  
 19 **Q We're now crossing up. This happens in**  
 20 **depos sometimes. I know what you meant to say and --**  
 21 **but the way the question was phrased, was technically**  
 22 **unclear. Let me ask you this way:**  
 23 **To the best of your knowledge, was there a**  
 24 **written security plan for Sierra Townhomes?**  
 25 A No.

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1 **Q What employees or other workers at Sierra**  
 2 **Townhomes were supposed to keep Sierra Townhomes**  
 3 **safe?**  
 4 MS. MORTON: Object to the form of  
 5 the question. Calls for speculation and  
 6 vague.  
 7 THE WITNESS: I don't know what you  
 8 mean by "safe."  
 9 **Q (By Mr. Butler) Do you know what the word**  
 10 **safe means in the context of apartment complex?**  
 11 A I do know what you mean. I know what the  
 12 word "safe" means, but I don't know how you mean what  
 13 we were -- if somebody saw a big hole in the ground  
 14 --  
 15 **Q Uh-huh.**  
 16 A -- okay, of course, we're going to try to  
 17 cover that hole, find out why the hole was there and  
 18 repair it so nobody falls in the hole. You know,  
 19 it's just we were all -- we all know to look out for  
 20 any liability issues as far as anything that somebody  
 21 can get hurt on, if we saw anything.  
 22 **Q What do you mean by "liability issues"?**  
 23 A Anything, like if there was a sinkhole or  
 24 -- I mean, we never had a sinkhole there, but I'm  
 25 just using examples -- or if there were any hanging

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1 wires, if somebody ran over one of the curbs and  
 2 busted up some concrete and it was, you know, in the  
 3 driveway, we would move it out of the way so a car  
 4 wouldn't run over it.  
 5 **Q When you say "liability issues," that**  
 6 **means something that Sierra Townhomes could get sued**  
 7 **about; is that right?**  
 8 A Sure.  
 9 **Q Now, what am -- excuse me. Were there**  
 10 **anyone -- was anyone who worked at Sierra Townhomes**  
 11 **who was not an employee for Arman Soltani? Do you**  
 12 **understand what I'm trying to ask?**  
 13 A No.  
 14 MS. MORTON: Yes, let me object  
 15 because --  
 16 **Q (By Mr. Butler) When I --**  
 17 MS. MORTON: -- I think it's going  
 18 to call for a legal conclusion.  
 19 **Q (By Mr. Butler) When I ask after --**  
 20 MS. MORTON: You can rephrase.  
 21 **Q (By Mr. Butler) When I use the term peop**  
 22 **-- or employees of Sierra Townhomes, what I want to**  
 23 **mean is everyone who worked there at Sierra**  
 24 **Townhomes, but it's possible there's an independent**  
 25 **contractor out there somewhere that I don't know**

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1 about it. So I want to make sure my language catches  
 2 that person.  
 3 Best of your knowledge, is anyone who  
 4 worked at Sierra Townhomes not an employee of Sierra  
 5 Townhomes?  
 6 A There -- there were contractors, like lawn  
 7 care people.  
 8 Q Okay.  
 9 A Things like that.  
 10 Q What people at Sier -- strike that.  
 11 What people who worked at Sierra Townhomes  
 12 were supposed to keep the tenants and guests of  
 13 Sierra Townhomes safe from violent crime?  
 14 MS. MORTON: Object to the form of  
 15 the question. I think it calls for a legal  
 16 conclusion. It's lacking in foundation.  
 17 You can answer.  
 18 MR. BUTLER: That is an  
 19 extraordinarily meritless stream of  
 20 objections. This lady's been working on  
 21 property management for 37 years, been at  
 22 Sierra Townhomes for a long time. She  
 23 knows what people's jobs are because  
 24 everyone there reported to her, as you have  
 25 heard her --

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1 MS. MORTON: This --  
 2 MR. BUTLER: -- testify.  
 3 MS. MORTON: This is a legal --  
 4 MR. BUTLER: So this is what's going  
 5 to happen: You're going to stop --  
 6 MS. MORTON: -- obligation that  
 7 isn't --  
 8 MR. BUTLER: Don't interrupt me. I  
 9 haven't interrupted you yet, don't do it to  
 10 me. And don't make speaking objections.  
 11 That's totally improper and you know it.  
 12 So please, stop.  
 13 MS. MORTON: I'm not making speaking  
 14 objections. I am simply stating the basis  
 15 of my objection in as few words as  
 16 possible.  
 17 MR. BUTLER: But there wasn't a  
 18 basis for that objection. None whatsoever.  
 19 Q (By Mr. Butler) Based on your knowledge of  
 20 Sierra --  
 21 MS. MORTON: Yes, there was.  
 22 MR. BUTLER: Are you finished?  
 23 MS. MORTON: I am.  
 24 Q (By Mr. Butler) Based on your knowledge at  
 25 Sierra Townhomes, what employees or other people who

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1 worked at Sierra Townhomes were responsible for  
 2 keeping the tenants and their guests safe from  
 3 violent crimes?  
 4 MS. MORTON: Same objection. You  
 5 can answer.  
 6 THE WITNESS: I would say we all  
 7 have responsibility.  
 8 Q (By Mr. Butler) Everyone who worked there?  
 9 A Yes.  
 10 Q Now, we talked earlier about cameras at  
 11 Sierra Townhomes. Do you remember that?  
 12 A Yes.  
 13 Q We talked about fake dummy cameras.  
 14 A Yes.  
 15 Q And I think you said there were, to your  
 16 knowledge, no real working cameras at Sierra  
 17 Townhomes. Did I remember that right?  
 18 A Yes.  
 19 Q All right. Where were the fake dummy  
 20 cameras?  
 21 A I don't remember the location of all of  
 22 them.  
 23 Q Where were some of them?  
 24 A I think some were at the mailbox, at the  
 25 leasing office. I think at both -- both entrances,

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1 some pointing towards both of the entrances.  
 2 Q Uh-huh.  
 3 A And I -- I don't remember the other  
 4 locations, if there are any.  
 5 Q All right. I'm going to show now what  
 6 I'll mark as Plaintiff's Exhibit C.  
 7 (Exhibit C was marked for  
 8 identification.)  
 9 Q (By Mr. Butler) Take a look at that.  
 10 MR. BUTLER: And Ms. Morton, I will  
 11 probably use it again, so you might want to  
 12 hang onto that copy.  
 13 Q (By Mr. Butler) Plaintiff's Exhibit C is a  
 14 map of Sierra Townhomes; is that right?  
 15 A Yes.  
 16 Q All right. And on this map of Sierra  
 17 Townhomes, the leasing office is where it says  
 18 clubhouse, I think. Is that right?  
 19 A Yes.  
 20 Q All right. Put that one aside, and I'm  
 21 going to hand you another one. And this one I'm  
 22 going to mark and ask you to draw on.  
 23 (Exhibit D was marked for  
 24 identification.)  
 25 Q (By Mr. Butler) I want you to use a

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<p>1 <b>Sharpie, and this is where I'm going to ask you to</b></p> <p>2 <b>put where the cameras were, or the fake dummy</b></p> <p>3 <b>cameras. So, I'm writing "fake dummy cameras." And</b></p> <p>4 <b>put, if you would, on Plaintiff's Exhibit D, a small</b></p> <p>5 <b>circle on the places where you remember there being</b></p> <p>6 <b>fake dummy cameras, please.</b></p> <p>7 A Well, I don't recall exactly.</p> <p>8 <b>Q You mentioned the leasing office.</b></p> <p>9 A Yeah.</p> <p>10 <b>Q So put a circle there.</b></p> <p>11 A Right there.</p> <p>12 MS. MORTON: And he doesn't want you</p> <p>13 to guess.</p> <p>14 <b>Q (By Mr. Butler) That's true. If you don't</b></p> <p>15 <b>remember exactly what corner --</b></p> <p>16 A I --</p> <p>17 <b>Q -- of a --</b></p> <p>18 A I --</p> <p>19 <b>Q -- building something was on --</b></p> <p>20 A Yeah. I don't really remember what</p> <p>21 corner.</p> <p>22 <b>Q That's okay. You can do a big circle.</b></p> <p>23 A Okay.</p> <p>24 <b>Q You mentioned the -- there you go.</b></p> <p>25 A I'm just trying to think.</p>	<p>1 <b>Q Sure.</b></p> <p>2 A You know, I -- so, I don't know.</p> <p>3 <b>Q Well, do you remember where the dumpsters</b></p> <p>4 <b>were, on the property?</b></p> <p>5 A Yeah. I think I -- yeah. I remember</p> <p>6 where the dumpsters are.</p> <p>7 <b>Q All right. How about the AC?</b></p> <p>8 A There's AC units everywhere.</p> <p>9 <b>Q Where are the ones that have the fence</b></p> <p>10 <b>around them?</b></p> <p>11 A I believe behind the -- there's some</p> <p>12 behind the C, the C Building, I think, and the J</p> <p>13 Building.</p> <p>14 (Exhibit E was marked for</p> <p>15 identification.)</p> <p>16 <b>Q (By Mr. Butler) Okay. I'll hand you what</b></p> <p>17 <b>I've marked as Plaintiff's Exhibit E. It's another</b></p> <p>18 <b>copy of that map. And I'll have drawn a key for you.</b></p> <p>19 <b>I'd ask you to put a star where the dumpsters were,</b></p> <p>20 <b>and a A square where the AC units were.</b></p> <p>21 A A star where the dumpsters?</p> <p>22 <b>Q Yeah.</b></p> <p>23 A (Witness complies.)</p> <p>24 <b>Q All right. Did you do boxes for the air</b></p> <p>25 <b>conditioners?</b></p>
<p>Page 90</p> <p>1 <b>Q Take your time. Mike's already asleep.</b></p> <p>2 A Like I said, I'm not sure.</p> <p>3 <b>Q You can do your circles big if you need</b></p> <p>4 <b>to. If you know it's around the entrance, you can</b></p> <p>5 <b>circle the entrance. That will be fine --</b></p> <p>6 A Yeah, I just -- okay. Somewhere there.</p> <p>7 <b>Q Okay.</b></p> <p>8 A That's the only places that I recall.</p> <p>9 <b>Q All right.</b></p> <p>10 A Or think.</p> <p>11 <b>Q Where is the mailbox?</b></p> <p>12 A Right next to the leasing office.</p> <p>13 <b>Q Okay.</b></p> <p>14 A It's --</p> <p>15 <b>Q So you've got that done?</b></p> <p>16 A Yeah.</p> <p>17 <b>Q All right. Hand that to me. I'll put it</b></p> <p>18 <b>by the court reporter.</b></p> <p>19 <b>All right. Oh yeah, what about by the air</b></p> <p>20 <b>conditioning unit and the dumpster? We heard about</b></p> <p>21 <b>this yesterday from Mr. Soltani, is the reason I'm</b></p> <p>22 <b>asking you.</b></p> <p>23 A I don't -- I've not been where the AC</p> <p>24 units are in the while, you know, not been back</p> <p>25 there, because it's all fenced in and --</p>	<p>Page 92</p> <p>1 A Oh, sorry.</p> <p>2 <b>Q You're having a lot of work today. It's a</b></p> <p>3 <b>good thing --</b></p> <p>4 A When I do -- there's air conditioners</p> <p>5 behind every building or, you know, at every</p> <p>6 building.</p> <p>7 <b>Q The ones with the fences around them are</b></p> <p>8 <b>the ones we heard about yesterday. So that's what</b></p> <p>9 <b>I'm interested in. I believe he said they were</b></p> <p>10 <b>behind J and one other.</b></p> <p>11 A I don't -- I -- and I don't recall if they</p> <p>12 have fences. They may. I know there's an area</p> <p>13 that's, I think, right here.</p> <p>14 <b>Q Okay.</b></p> <p>15 A And then back here.</p> <p>16 <b>Q All right. Thank you very much.</b></p> <p>17 <b>Did -- in January 2015, did Sierra</b></p> <p>18 <b>Townhomes have the financial ability to install real</b></p> <p>19 <b>cameras if it had so chosen?</b></p> <p>20 A I don't know. I never got to see any</p> <p>21 financial statements. All we did on the property</p> <p>22 site was the receivables. So I -- I never saw</p> <p>23 financial statements, but I don't know if there was</p> <p>24 the financial means.</p> <p>25 <b>Q What, if anything, do you know about --</b></p>

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1 **did you keep the books for money coming in and out of**  
 2 **Sierra Townhomes?**  
 3 A Just the income.  
 4 **Q Right.**  
 5 A All property accounts for the rents  
 6 collect.  
 7 **Q What was the approximate income of Sierra**  
 8 **Townhomes in 2014?**  
 9 MS. MORTON: Objection. Relevance.  
 10 You can answer.  
 11 THE WITNESS: I don't know for 2014.  
 12 **Q (By Mr. Butler) What about -- what's the**  
 13 **period that you do know?**  
 14 A I didn't come 'till October, at the end of  
 15 October. On a monthly --  
 16 **Q Sure. That'd be good.**  
 17 A -- basis, we would collect between 93,  
 18 95,000.  
 19 **Q Okay. So on an average month, in your**  
 20 **experience at Sierra Townhomes, the incoming money**  
 21 **would be between 93 and \$95,000 --**  
 22 A During that --  
 23 **Q Did I get that right?**  
 24 A Yes. During that time.  
 25 **Q Did tenants at Sierra Townhomes ever ask**

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1 **you or, to your knowledge, Mr. Soltani about**  
 2 **installing real cameras?**  
 3 A I'm not aware -- I mean, no one ever asked  
 4 me about installing, you know, live cameras.  
 5 **Q And to your knowledge, no one ever asked**  
 6 **Arman Soltani?**  
 7 A No. I don't know.  
 8 **Q Okay. What about courtesy officers? Let**  
 9 **me redo the question. New paragraph.**  
 10 **Did Sierra Townhomes' tenants, or people**  
 11 **who worked at Sierra Townhomes, ever ask you about**  
 12 **hiring additional courtesy officers?**  
 13 A I don't recall anyone ever saying anything  
 14 about additional courtesy officers.  
 15 **Q What about courtesy officers in general?**  
 16 A We always typically had one courtesy  
 17 officer.  
 18 **Q There wasn't a courtesy officer at Sierra**  
 19 **Townhomes on January 18, 2015; is that true?**  
 20 A That is correct.  
 21 **Q What about -- well, let me strike that.**  
 22 **Did tenants or people who worked at Sierra**  
 23 **Townhomes ever ask you about hiring a security guard**  
 24 **as opposed to a courtesy officer?**  
 25 A No one ever asked me.

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1 **Q To your knowledge, did anyone ever ask**  
 2 **Mr. Soltani about that?**  
 3 A No. I don't know. Not to my knowledge.  
 4 **Q Yeah. When I say "to your knowledge," I'm**  
 5 **asking you what you know --**  
 6 A Yeah.  
 7 **Q -- because I understand, say if someone**  
 8 **asked me about Mike, did anyone ever ask him a**  
 9 **certain thing, I could say, not to my knowledge.**  
 10 **Because I've never seen anyone ask him that he's**  
 11 **never told me that. And that's what I mean with you**  
 12 **and Mr. Soltani.**  
 13 A Okay.  
 14 **Q I know you don't know what he goes through**  
 15 **when you're not around him.**  
 16 **How did Sierra Townhomes screen tenants?**  
 17 A We have a -- a company that we input the  
 18 information from the application, pulls credit and  
 19 criminal history. And we -- it would verify their  
 20 employment to make sure they were still employed.  
 21 **Q Uh-huh.**  
 22 A And any previous rental history.  
 23 **Q What kind of history would you look at?**  
 24 A I mean, we looked at all criminal history  
 25 that would, you know, show up. There were some

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1 things, if it was a DUI from so many years ago, you  
 2 know, that kind of thing, you know...  
 3 **Q Then you didn't care?**  
 4 A Yeah. No big deal.  
 5 **Q Uh-huh.**  
 6 A But we -- we -- what we focused on was  
 7 violent crimes. Threat, burglary, drugs, you know.  
 8 **Q So, if someone had violent crime on their**  
 9 **criminal history, y'all did not want them as a**  
 10 **tenant?**  
 11 A Correct.  
 12 **Q When you did that, that is when you looked**  
 13 **at the criminal history and decided whether or not to**  
 14 **accept the tenant on that basis, what did you tell**  
 15 **the tenant?**  
 16 A Well, by law, all we can do is tell them  
 17 that their application was denied. Then a letter is  
 18 sent to them giving them the information on the  
 19 agency that we used to pull their information, and  
 20 then they're -- you know, they can get a copy of  
 21 whatever we received.  
 22 **Q I see. So, did you tell them -- if you**  
 23 **denied a tenant because of their criminal history,**  
 24 **would you tell that tenant that you were denying him**  
 25 **or her based on the criminal history?**



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1 A Yes. We could -- we were allowed to say  
 2 it was either due to credit or criminal.  
 3 **Q I see. Were there any signs that you have**  
 4 **at Sierra Townhomes telling people that there were**  
 5 **cameras around and watching?**  
 6 A I don't remember if there were any up or  
 7 not.  
 8 **Q We heard yesterday from Mr. Soltani that**  
 9 **there were such signs by the air conditioning units**  
 10 **and by the dumpsters. Do you know whether that's**  
 11 **right, one way or the other?**  
 12 A I -- I don't -- I don't know. I don't  
 13 recall seeing anything.  
 14 **Q Okay. Was there ever a time where Sierra**  
 15 **Townhomes had a guard by the entrances checking the**  
 16 **IDs of people who came and went?**  
 17 A Yes. We did request or require the  
 18 courtesy officers, we would call it a gate patrol,  
 19 where they would be at the entrance and check IDs  
 20 coming in and out.  
 21 **Q So when a -- when a courtesy officer**  
 22 **checked IDs coming in and out, you called that gate**  
 23 **patrol?**  
 24 A Yes.  
 25 **Q When did Sierra Townhomes have gate**

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1 **patrol?**  
 2 A What do you mean "when"?  
 3 **Q What months and years?**  
 4 A It would be -- it was supposed to just be  
 5 random. The courtesy officers usually knew when  
 6 there was more volume, you know, people coming in and  
 7 out. And it was done on a random basis.  
 8 **Q So sometimes there was gate patrol and**  
 9 **sometimes not? And whether there would be or**  
 10 **wouldn't be, was a random thing?**  
 11 A Yes.  
 12 **Q How often, in a given month, would Sierra**  
 13 **Townhomes have gate patrol?**  
 14 A Usually, several times a week.  
 15 **Q Okay. When was the last gate patrol**  
 16 **before January 18, 2015?**  
 17 A It would have been in October of 2014.  
 18 **Q Because that's the last time there was a**  
 19 **courtesy officer?**  
 20 A Correct.  
 21 **Q And when was the first time, after January**  
 22 **18, 2015, that Sierra Townhomes had a gate patrol?**  
 23 A I believe the first part of February.  
 24 **Q Because that's when --**  
 25 A 2015.

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1 **Q Because that's when the -- when there was**  
 2 **another courtesy guard?**  
 3 A Yes.  
 4 **Q Or courtesy officer, I should say --**  
 5 MS. MORTON: Object to the form of  
 6 the question.  
 7 MR. BUTLER: Courtesy officer is  
 8 what I meant.  
 9 MS. MORTON: Okay.  
 10 **Q (By Mr. Butler) There are peepholes in**  
 11 **some of the apartment doors at Sierra Townhomes, I**  
 12 **think; is that right?**  
 13 A Yes.  
 14 **Q And not on others?**  
 15 A Yes.  
 16 **Q Sierra Townhomes, as I understand it,**  
 17 **asked tenants to install alarm systems. Do I**  
 18 **understand that correctly?**  
 19 A That we asked them to install them?  
 20 **Q Yeah. This is from -- from my memory of**  
 21 **Mr. Soltani yesterday. Is that familiar to you?**  
 22 A No. I've -- I'm not aware of us asking  
 23 any resident to install an alarm system.  
 24 **Q Did Sierra Townhomes install alarm systems**  
 25 **in any of the apartments in the complex?**

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1 A No. Not to my knowledge.  
 2 **Q Did -- have you ever seen an alarm system**  
 3 **in an apartment complex at Sierra Town -- strike**  
 4 **that.**  
 5 **Have you ever seen an alarm system in an**  
 6 **apartment --**  
 7 A Yes.  
 8 **Q -- at Sierra Townhomes?**  
 9 A Yeah.  
 10 **Q When was that?**  
 11 A I mean, residents put them in all the  
 12 time.  
 13 **Q Okay. How many of the residents have**  
 14 **them, do you think?**  
 15 MS. MORTON: Object to the extent it  
 16 calls for speculation. You can answer if  
 17 you know.  
 18 THE WITNESS: I mean, I -- I know  
 19 four or five people, you know, that have  
 20 them.  
 21 **Q (By Mr. Butler) Okay. Have you ever heard**  
 22 **of an apartment complex putting in the hardware to**  
 23 **install an alarm system in an apartment so that**  
 24 **tenants could install them more easily?**  
 25 MS. MORTON: Object to the extent it

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1 calls for hearsay. You can answer.  
 2 THE WITNESS: I'm not aware of any  
 3 doing the hardware. I am aware of some  
 4 communities that put the alarm systems in.  
 5 **Q (By Mr. Butler) Have you worked at**  
 6 **communities like that?**  
 7 A Yes.  
 8 **Q How does -- in some communities, the alarm**  
 9 **-- strike that.**  
 10 **In some communities, the apartment complex**  
 11 **would install the alarm system for the tenants?**  
 12 A Yes.  
 13 **Q What's one that was like that, in your**  
 14 **experience?**  
 15 A It was called Lantana Apartments. It's  
 16 off of Wesley Chapel.  
 17 **Q Here in Atlanta?**  
 18 A Uh-huh. Yes.  
 19 MS. MORTON: Make sure you say yes.  
 20 **Q (By Mr. Butler) Lantana Apartments.**  
 21 A I think the name has changed now.  
 22 **Q Okay. They seem to change it a lot.**  
 23 A They do.  
 24 **Q There are two entrances to Sierra**  
 25 **Townhomes, right?**

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1 A Yes.  
 2 **Q And there's only one gate at Sierra**  
 3 **Townhomes, right?**  
 4 A Yes.  
 5 **Q And that was true in January of 2015?**  
 6 A Yes.  
 7 **Q I'm going to hand you what I've marked as**  
 8 **Plaintiff's Exhibit 4. And that's another of these**  
 9 **maps that we've been looking at.**  
 10 MS. MORTON: Did you say 4?  
 11 MR. BUTLER: Thank you.  
 12 (Exhibit F was marked for  
 13 identification.)  
 14 **Q (By Mr. Butler) I'm going to show you what**  
 15 **I've marked as Plaintiff's Exhibit F, as in foxtrot.**  
 16 **And it's another of these maps that we've been**  
 17 **looking at. And I'm going to ask you to put a G --**  
 18 MS. MORTON: Sorry. I just thought  
 19 I misheard you.  
 20 **Q (By Mr. Butler) -- where there's a gate,**  
 21 **and NG where there is no gate.**  
 22 A (Witness complies.)  
 23 **Q Okay. Thank you. The gate is at the**  
 24 **entrance near the leasing office; is that right?**  
 25 A Yes.

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1 **Q Why did Sierra -- well, strike that.**  
 2 **Did employees or tenants of Sierra**  
 3 **Townhomes ever ask you about putting in a second**  
 4 **gate?**  
 5 A No one's ever asked me about putting in a  
 6 second gate.  
 7 **Q To the best of your knowledge, has anyone**  
 8 **ever asked Mr. Soltani about that?**  
 9 A I do not know.  
 10 **Q Would you agree that free access to the**  
 11 **apartment complex creates a risk for tenants and**  
 12 **their guests?**  
 13 MS. MORTON: Object to the form of  
 14 the question. Calls for speculation.  
 15 Lacks foundation. You can answer.  
 16 THE WITNESS: I don't understand --  
 17 what do you mean by "free access"?  
 18 **Q (By Mr. Butler) That's a good question.**  
 19 **That there's no gate on the second entrance, right?**  
 20 A Sure.  
 21 **Q And so that means anyone and come and go**  
 22 **through it, right?**  
 23 A Yes.  
 24 **Q That's what I mean by free access.**  
 25 A Oh.

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1 **Q Anyone able to come and go.**  
 2 **Would you agree that free access to the**  
 3 **apartment complex creates a risk for tenants and**  
 4 **their guests?**  
 5 MS. MORTON: Same objection. You  
 6 can answer.  
 7 THE WITNESS: I don't see where it's  
 8 any more risk.  
 9 **Q (By Mr. Butler) If there was not free**  
 10 **access, they might be safer, right?**  
 11 MS. MORTON: Object to the form of  
 12 the question and it calls for speculation.  
 13 You can answer.  
 14 THE WITNESS: I mean, it may or may  
 15 not. I -- I don't know.  
 16 **Q (By Mr. Butler) All right. We've already**  
 17 **mapped out the gate.**  
 18 **Did Sierra Townhomes have enough lights on**  
 19 **the property to keep the place reasonably lit at**  
 20 **night?**  
 21 A I believe so.  
 22 **Q All right. The map we've been using, the**  
 23 **clean copy of which we marked as Plaintiff's Exhibit**  
 24 **C, is actually from a lighting check, isn't it?**  
 25 A It appears so.

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1 **Q And there's -- if I look at Plaintiff's**  
 2 **Exhibit C, there's some markings on it that you and I**  
 3 **didn't create, or at least not today, that look like**  
 4 **Vs. Do you see those?**  
 5 A Yes.  
 6 **Q What are those?**  
 7 A Those are the actual, I guess, you call  
 8 them flood lights, the big -- the big lights --  
 9 **Q Uh-huh.**  
 10 A -- that are on the building, and the  
 11 location where they are on the buildings.  
 12 **Q I see. So on -- on Plaintiff's Exhibit C,**  
 13 **the things, the markings that look like Vs, are the**  
 14 **location of lights; is that right?**  
 15 A Not all lights, but the lights that are on  
 16 the buildings.  
 17 **Q What other lights are there?**  
 18 A Georgia Power poles.  
 19 **Q Are the Georgia Power poles here on the**  
 20 **side of the -- what looks like the bottom of this**  
 21 **map, that is the side of the apartment complex**  
 22 **opposite the words, "Sierra Townhomes"?**  
 23 A Well, they're all throughout the property.  
 24 **Q Okay. For clarity, later, what I'm going**  
 25 **to do is take a highlighter, and I'm going to go**

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1 **through. And because these little Vs are sometimes**  
 2 **vague, I'm going to try to highlight them all. And**  
 3 **then I'll ask you if I got them all.**  
 4 **There's some circles on this map too. Do**  
 5 **you know what those mean? There's a circle by**  
 6 **Building L, as lima, K as in kilo, and laundry.**  
 7 A I don't know.  
 8 **Q Okay.**  
 9 A What those are for.  
 10 **Q We will ignore them then.**  
 11 **I'm handing you now what I've marked as**  
 12 **Plaintiff's Exhibit G as in golf.**  
 13 **(Exhibit No. G was marked for**  
 14 **identification.)**  
 15 **Q (By Mr. Butler) Have I accurately**  
 16 **highlighted the places where there are flood lights**  
 17 **mounted on buildings?**  
 18 A Yes.  
 19 **Q Thank you. Did the lights at Sierra**  
 20 **Townhomes normally work like they should?**  
 21 A Yes.  
 22 **Q Were there periods of time where a**  
 23 **significant percentage of the lights at Sierra**  
 24 **Townhomes were not working?**  
 25 A I don't know about a significant

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1 percentage.  
 2 **Q Well, did tenants or people who worked at**  
 3 **Sierra Townhomes ever complain about the lights not**  
 4 **working?**  
 5 A If a light bulb -- if a light was out,  
 6 sometimes a resident might report it to us or a  
 7 courtesy officer would report it to us. During the  
 8 -- the fall year -- you know, times, when we would  
 9 leave the leasing office when it was already dark  
 10 outside, we would also, you know, take notice and see  
 11 if anything was out. And then we would do a work  
 12 order and we -- our maintenance staff would replace  
 13 these bulbs.  
 14 **Q Was there ever a time where a tenant or**  
 15 **someone who worked at Sierra Townhomes, complained**  
 16 **that Sierra Townhomes was too slow in fixing lights**  
 17 **that were not working?**  
 18 A I'm not aware of anyone, during my time,  
 19 complaining about taking too long for lights.  
 20 **Q Did the -- strike that.**  
 21 **Did tenants or people who worked at Sierra**  
 22 **Townhomes ever make request -- strike that again.**  
 23 **Did Sierra Townhomes ever refuse to fix**  
 24 **lights that were not working after Sierra Townhomes**  
 25 **had been asked to fix those lights?**

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1 A Not to my knowledge.  
 2 **Q Why -- when the light went out, was it**  
 3 **typically a bulb or something else?**  
 4 A Usually a bulb.  
 5 **Q Did tenants or people who worked at Sierra**  
 6 **Townhomes ever ask you or Arman Soltani to install**  
 7 **additional lights at the apartment complex?**  
 8 MS. MORTON: Object to the extent it  
 9 calls for speculation. You can answer.  
 10 THE WITNESS: No one ever asked me.  
 11 I don't know about Mr. Soltani.  
 12 **Q (By Mr. Butler) So no one ever asked you**  
 13 **about adding additional lights at Sierra Townhomes?**  
 14 A Correct.  
 15 **Q Would you -- would you agree that if**  
 16 **Georgia Power's lights are not working on Sierra**  
 17 **Townhomes, then it is the job of the ownership and**  
 18 **the management of Sierra Townhomes to tell Georgia**  
 19 **Power those lights are not working?**  
 20 A Yes.  
 21 **Q To the best of your knowledge, was cost a**  
 22 **factor in the decision by Sierra Townhomes not to**  
 23 **hire an additional courtesy officer?**  
 24 MS. MORTON: Object to the form of  
 25 the question. You can answer.

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<p>1 THE WITNESS: I -- I don't know. 2 We've always only had one. I'm not even 3 aware of a conversation about ever having a 4 second one. 5 <b>Q (By Mr. Butler) To the best of your 6 knowledge, was cost a factor in Sierra Townhomes' 7 decision not to have a second gate?</b> 8 MS. MORTON: Same objection. You 9 can answer. 10 THE WITNESS: I don't believe so. 11 <b>Q (By Mr. Butler) To the best of your 12 knowledge, was cost a factor in Sierra Townhomes' 13 decision not to install more lights?</b> 14 MS. MORTON: Same objection. You 15 can answer. 16 THE WITNESS: I don't believe so. 17 <b>Q (By Mr. Butler) To the best of your 18 knowledge, was cost a factor in Sierra Townhomes' 19 hesitancy or slowness in fixing lights that were not 20 working?</b> 21 MS. MORTON: Object to the form of 22 the question. You can answer. 23 THE WITNESS: No. 24 <b>Q (By Mr. Butler) To the best of your 25 knowledge, was cost a factor in Sierra Townhomes'</b></p>	<p>1 <b>letter explaining to him exactly why he was fired.</b> 2 A Yes. 3 <b>Q Is that right?</b> 4 A Yes. 5 <b>Q We learned yesterday this was your 6 signature on this document. I'll show you now what's 7 been marked as Plaintiff's Exhibit H as in hotel. 8 (Exhibit H was marked for 9 identification.)</b> 10 MS. MORTON: I don't think that's 11 actually what he said yesterday, but... 12 <b>Q (By Mr. Butler) Did you write this letter?</b> 13 MS. MORTON: Now that I think, it's 14 what he said yesterday. 15 THE WITNESS: Yes. 16 <b>Q (By Mr. Butler) And this explains why 17 Mr. Lassiter was fired, right?</b> 18 A It does. 19 <b>Q It says he was fired because he didn't 20 help with the paving schedule like Sierra Townhomes 21 expected him to; is that right?</b> 22 A I'm reading -- I'm having to read to 23 refresh my memory here. 24 <b>Q Sure.</b> 25 A Yes.</p>
<p>Page 110</p> <p>1 <b>decision not to hire a security guard as opposed to a 2 courtesy officer?</b> 3 MS. MORTON: Same objection. You 4 can answer. 5 THE WITNESS: I -- I don't know. 6 <b>Q (By Mr. Butler) To the best of your 7 knowledge, was cost a factor in Sierra Townhomes' 8 decision not to install real cameras that worked?</b> 9 MS. MORTON: Same objection. You 10 can answer -- 11 THE WITNESS: I don't know. 12 <b>Q (By Mr. Butler) You told me the mailboxes 13 were by the entrance?</b> 14 A The first entrance, right next to the 15 leasing office. 16 <b>Q By the gated entrance?</b> 17 A Yes. 18 <b>Q So Sierra Townhomes, at one time, had a 19 courtesy officer by the name of Lassiter, I think. 20 Is that right?</b> 21 A Yes. 22 <b>Q And Sierra Townhomes had to fire 23 Mr. Lassiter, as I understand it. Is that right?</b> 24 A Yes. 25 <b>Q And you actually wrote Mr. Lassiter a</b></p>	<p>Page 112</p> <p>1 <b>Q Whose signature is that at the bottom?</b> 2 A Mine. 3 <b>Q Okay. And now --</b> 4 MS. MORTON: I stand corrected. 5 <b>Q (By Mr. Butler) It's okay. We're done 6 with that.</b> 7 <b>I wanted to ask you a little bit about the 8 apartment in which Ms. Jeffries was shot or -- excuse 9 me, that Mr. Payne was shot. Who was the first 10 person in there after Antonio Payne was shot, to the 11 best of your knowledge?</b> 12 A I do not know, because I was not there. 13 <b>Q Well -- okay. Did it have to be cleaned 14 up?</b> 15 A No. Not to my knowledge. 16 <b>Q Was there no blood in the apartment where 17 he was shot?</b> 18 A I don't know about any apartment, because 19 I couldn't get access. 20 <b>Q Is that because the police were there?</b> 21 A No. 22 <b>Q Why couldn't you get access?</b> 23 A When I was made aware of what happened, 24 was the Monday after the incident. And when 25 residents told us, I walked over to the unit --</p>

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1     **Q**   **Uh-huh.** --

2     A    -- I expected to find, you know, maybe a

3 broken window, you know. I didn't know what -- what

4 to the expect. Went to the door, there was nothing.

5 There was no blood on the patio. There was no holes

6 in the wall, no broken windows. No nothing at that

7 particular time.

8     **Q**   **Uh-huh.**

9     A    I knocked on the door, nobody was there.

10 I -- you know, I went back a little later that day,

11 and the key that we had on -- in our file did not

12 work in the door. So I couldn't get in. And Ms.

13 Jeffries' phone was not -- you know, it was

14 disconnected.

15     **Q**   **I see. What do you know about the -- the**

16 **apartment after the shooting, the condition of the**

17 **apartment or anything like that?**

18     A    I don't know anything about it until --

19 she was under the eviction process then, and she

20 vacated. And we went in and turned the apartment

21 like a normal turn and moved somebody else in.

22     **Q**   **When is first time you or another person**

23 **who worked at Sierra Townhomes was in the apartment**

24 **after the shooting?**

25           MS. MORTON: Object to the extent it

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1     calls for speculation. You can answer.

2           THE WITNESS: I believe she -- we

3 agreed for her to vacate on January the

4 31st. Keys were turned in on the 31st, so

5 it would have been a couple of days. The

6 first week of February, before I walked it.

7     **Q**   **(By Mr. Butler) Okay. Did you see**

8 **anything unusual when you walked it in early**

9 **February?**

10     A    No. Nothing that stuck out.

11     **Q**   **All right. Let's do a little more and**

12 **then we'll have a break for lunch.**

13     A    Okay.

14     **Q**   **If there is dangerous activity going on at**

15 **an apartment complex, do you agree that tenants and**

16 **their guests have a right to know about it?**

17           MS. MORTON: Object to the form.

18           You can answer.

19           THE WITNESS: Sure.

20     **Q**   **(By Mr. Butler) When it comes to violent**

21 **crime in an apartment complex, tenants and their**

22 **guests have a right to know what the apartment**

23 **complex and management, the ownership knows, true?**

24           MS. MORTON: Same objection. You

25 can answer.

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1           THE WITNESS: To some extent.

2     **Q**   **(By Mr. Butler) To what extent is that not**

3 **true?**

4     A    Sometimes things happen that are domestic

5 violence, different things like that. It's not a

6 random act. You know, I -- I don't feel that you

7 have to disclose all that information. You know it's

8 -- it's -- you know, it's not something that would

9 affect the residents one way or the other.

10     **Q**   **So you think there are some violent crimes**

11 **that tenants and their guests did not have a right to**

12 **know about?**

13           MS. MORTON: Object to the form.

14           You can answer.

15           THE WITNESS: I guess you would say

16 yes.

17     **Q**   **(By Mr. Butler) What kinds of things, in**

18 **your view, do tenants and their guests have a right**

19 **to know about?**

20     A    They would have a right to know if there

21 were rapists in the area. If there were, you know --

22 you know, particular things that were happening

23 within the apartment community on a regular basis.

24     **Q**   **Okay. So, if there was a viol -- if**

25 **there's violence going on, on a regular basis,**

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1 **tenants and their guests would have a right to know**

2 **about that?**

3     A    Yes.

4     **Q**   **If there were gunshots being fired on a**

5 **regular basis, tenants and their guests would have a**

6 **right to know about that?**

7     A    Yes.

8     **Q**   **If there were robberies occurring -- well,**

9 **strike that.**

10           **If a robbery occurred, would tenants and**

11 **their guests have a right to know about that?**

12     A    Yes.

13     **Q**   **If a burglary occurred, would tenants and**

14 **their guests have a right to know about that?**

15     A    Yes.

16     **Q**   **If someone is killed on the apartment**

17 **complex, would tenants and their guests have a right**

18 **to know about that?**

19     A    In some cases, yes.

20     **Q**   **In what cases would they not?**

21     A    Sorry. You said killed. I mean, because

22 you do have some people that just die. Old people

23 that die.

24     **Q**   **Sure. Let me ask it again. We'll clear**

25 **-- we'll get it cleared up.**

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1 **If someone is killed, do tenants and their**  
 2 **guests have a right to know about that?**  
 3 A In some cases.  
 4 **Q All right. In what cases would they not?**  
 5 **Why don't I put other than natural causes. Does that**  
 6 **make you feel more comfortable with it?**  
 7 A Yes. It's -- It's just if it was a random  
 8 act.  
 9 **Q What's not a random act in your view?**  
 10 A When the person that is the target does  
 11 not know the person.  
 12 **Q Who determines whether a killing is a**  
 13 **random act?**  
 14 A The police.  
 15 **Q Okay. So, if -- let's put it this way:**  
 16 **If a murder occurs at the apartment complex, do**  
 17 **tenants and their guests have a right to know about**  
 18 **it?**  
 19 A Well, if the murder is not a random act.  
 20 **Q If someone kills someone else in an**  
 21 **apartment complex, and the killer does not know the**  
 22 **victim, do tenants and their guests have a right to**  
 23 **know about it?**  
 24 A Sure.  
 25 **Q If someone is killed in the apartment**

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1 **complex, and the killer does know the victim, do**  
 2 **tenants and their guests have a right to know about**  
 3 **it?**  
 4 A I would say you would have to look at it,  
 5 case-by-case basis.  
 6 **Q So you're not willing to say that a**  
 7 **killing between a killer and a victim who knew each**  
 8 **other, is something that tenants had a right to know**  
 9 **about; is that correct?**  
 10 A In my opinion, no.  
 11 **Q In other words, no, they don't always have**  
 12 **a right to know about it?**  
 13 A Correct.  
 14 **Q What kind -- let me show you an exhibit.**  
 15 **I'm going to show you, now, what I'm going to mark as**  
 16 **Plaintiff's Exhibit I as in India.**  
 17 **(Exhibit I was marked for**  
 18 **identification.)**  
 19 **Q (By Mr. Butler) Tell me what we're looking**  
 20 **at, please.**  
 21 A It is a letter or a memo letting folks  
 22 know that there had been some break-ins. This was  
 23 during the time when the gentlemen were going through  
 24 the patio.  
 25 **Q This is when there was trouble with the**

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1 **sliding glass door break-ins?**  
 2 A Uh-huh. Yes.  
 3 **Q And this was during the time that some**  
 4 **criminals was storing stolen goods in an apartment on**  
 5 **Sierra Townhomes?**  
 6 A I believe -- yeah. I believe so.  
 7 **Q All right. The purpose of the memo that's**  
 8 **marked as Plaintiff's exhibit I, is to warn tenants**  
 9 **and their guests about the crime that's occurred; is**  
 10 **that right?**  
 11 A Yes.  
 12 **Q Were there any other memos warning tenants**  
 13 **and their guests about crime issues while you were**  
 14 **the property manager of Sierra Townhomes?**  
 15 A Not -- not that I recall. There may have  
 16 been a memo. We send one out usually in the fall,  
 17 right before the holidays, and then usually in the  
 18 summer, just reminding people about the holidays,  
 19 about not keeping packages in their car and, you  
 20 know, when they put their Christmas tree up, not to  
 21 have packages in plain site. You know, things like  
 22 that. You know, we do do those.  
 23 **Q Those give general safety advice, right?**  
 24 A Yes.  
 25 **Q Is it fair to say that other than**

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1 **Plaintiff's Exhibit I, you don't recall, during your**  
 2 **times as property manager of Sierra Townhomes, there**  
 3 **being any other memos that went out warning tenants**  
 4 **or their guests about specific criminal activity?**  
 5 A No. Not from October to May.  
 6 **Q We crossed up again because my question**  
 7 **started is it fair to say. So let me repeat it. I**  
 8 **keep rolling over my darn microphone cord. And we'll**  
 9 **do it the same -- well, let's see. Let's do it this**  
 10 **way. New paragraph.**  
 11 **Other than Plaintiff's Exhibit I, do you**  
 12 **know of any memo going out to tenants or their**  
 13 **guests, during your time as the property manager of**  
 14 **Sierra Townhomes, that warned people about specific**  
 15 **violent or other crime on the premises?**  
 16 A No, I do not.  
 17 **Q How many shootings would it take before**  
 18 **Sierra Townhomes thought it was appropriate to issue**  
 19 **a warning about shootings?**  
 20 MS. MORTON: Object to the form.  
 21 Calls for speculation. You can answer if  
 22 you know.  
 23 THE WITNESS: I -- I mean, I don't  
 24 know.  
 25 **Q (By Mr. Butler) Let me ask you about you**

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1 then instead of Sierra Townhomes globally.  
 2 How many shootings would it take before  
 3 you thought that a warning was appropriate to tenants  
 4 and their guests?  
 5 A It would have to be a consistent thing,  
 6 you know. Maybe three, four times.  
 7 Q Okay. How many occasions of gunfire at  
 8 Sierra Townhomes would there have to be before you  
 9 thought that a warning was appropriate?  
 10 A Three or four times.  
 11 Q How many burglaries or break-ins would  
 12 there have to be on the premises before you thought  
 13 that a warning was appropriate?  
 14 A Maybe three or four times.  
 15 Q How many violent crimes would there have  
 16 to be on the property before you thought that a  
 17 warning was appropriate?  
 18 MS. MORTON: Object to the form.  
 19 You can answer.  
 20 THE WITNESS: If it was a random  
 21 act, maybe the second time.  
 22 Q (By Mr. Butler) And a random act to you  
 23 means the perpetrator or criminal does not know the  
 24 victim; is that right?  
 25 A Correct. Correct.

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1 Q How many robberies would it take, in your  
 2 view, before you thought a warning was appropriate?  
 3 A One or two.  
 4 Q Have you and Arman Soltani ever talked  
 5 about whether to warn tenants and their guests on the  
 6 property?  
 7 MS. MORTON: Object to the form.  
 8 Vague. You can answer.  
 9 THE WITNESS: It was discussed, but  
 10 Sierra Townhomes is the kind of property  
 11 they come and tell us. They know -- they  
 12 know more than we know, so they all know.  
 13 Q (By Mr. Butler) Okay.  
 14 A Each and every incident, they know. And  
 15 then they know more information than they -- than  
 16 they're willing to even give us.  
 17 Q Okay.  
 18 A So it's not that they did not -- we're not  
 19 aware of anything.  
 20 Q When you said it was discussed, tell me  
 21 what you mean by that.  
 22 A It was discussed, you know, do we send out  
 23 a memo.  
 24 Q When did that discussion occur?  
 25 A It would have been December or January.

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1 Q Of 2014 to 2015?  
 2 A Yes. And we sent them -- this memo, you  
 3 know, about the break-ins?  
 4 Q And you -- you're referring now to  
 5 Plaintiff's Exhibit --  
 6 A Yes.  
 7 Q -- I, correct?  
 8 Okay. Were there other times that you and  
 9 Mr. Soltani talked about whether to issue a warning?  
 10 A No.  
 11 Q Okay.  
 12 A Not to my recollection.  
 13 Q You mentioned a second ago that quote,  
 14 they, end quote, all know about a crime going on. Do  
 15 you remember saying that?  
 16 A Yes.  
 17 Q Do you -- who do you mean when you say  
 18 "they"?  
 19 A Well, I mean, the residents. There are a  
 20 group of residents who just always know everything  
 21 and go and tell everybody else. It's always been  
 22 that kind of property.  
 23 Q Did you ever interview Shawnnita Jeffries  
 24 to figure out what she knew about crime at Sierra  
 25 Townhomes?

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1 A We attempted to speak with her, but, you  
 2 know, could not reach her. And she was in the  
 3 process of moving because she was under eviction at  
 4 that time.  
 5 Q This was after the shooting of Antonio  
 6 Payne, right?  
 7 A Yes.  
 8 Q At any time before the shooting of Antonio  
 9 Payne, did you, or to the best of your knowledge,  
 10 anyone else, ever interview Shawnnita Jeffries to  
 11 figure out what she knew about violent crime on the  
 12 property?  
 13 A No.  
 14 Q Do you know, one way or another, how much  
 15 or what Shawnnita Jeffries knew about violent crime  
 16 on the property?  
 17 A I don't know.  
 18 Q To the best of your knowledge, does anyone  
 19 who works at Sierra Townhomes or works for Sierra  
 20 Townhomes, know what it was Shawnnita Jeffries knew  
 21 or did not know about violent crime on the property?  
 22 A I don't know.  
 23 Q Okay.  
 24 MR. BUTLER: Now might be a good  
 25 time to take a lunch break.

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<p>1 MS. MORTON: Okay.</p> <p>2 VIDEOGRAPHER: Off the video record.</p> <p>3 The time is 12:36 p.m.</p> <p>4 (Recess was taken.)</p> <p>5 VIDEOGRAPHER: Back on the video</p> <p>6 record with Videotape No. 3. The time is</p> <p>7 1:30 p.m.</p> <p>8 <b>Q (By Mr. Butler) Okay. Ms. Richardson, you</b></p> <p>9 <b>mentioned Lantana Apartments at one point.</b></p> <p>10 A Yes.</p> <p>11 <b>Q You used to work there at some place else</b></p> <p>12 <b>in Atlanta, I think; is that right?</b></p> <p>13 A At where?</p> <p>14 <b>Q Someplace else in Atlanta. Wesley Chapel</b></p> <p>15 <b>or something.</b></p> <p>16 A Yes, Wesley Chapel.</p> <p>17 <b>Q Wesley Chapel. All right. At -- were</b></p> <p>18 <b>there any entrances to Lantana Apartments that did</b></p> <p>19 <b>not have gates on them?</b></p> <p>20 MS. MORTON: Objection. Relevance.</p> <p>21 You can answer.</p> <p>22 THE WITNESS: I don't think we had a</p> <p>23 gate there.</p> <p>24 <b>Q (By Mr. Butler) Okay. How big was Lantana</b></p> <p>25 <b>Apartments? How many units?</b></p>	<p>1 <b>Q (By Mr. Butler) Was there a security</b></p> <p>2 <b>guard?</b></p> <p>3 MS. MORTON: Same objection. You</p> <p>4 can answer --</p> <p>5 THE WITNESS: No --</p> <p>6 <b>Q (By Mr. Butler) As distinct from a</b></p> <p>7 <b>courtesy officer --</b></p> <p>8 A Oh, no. No.</p> <p>9 <b>Q Was there someone there checking IDs of</b></p> <p>10 <b>the people that came into the apartment complex?</b></p> <p>11 MS. MORTON: Same objection. You</p> <p>12 can answer.</p> <p>13 THE WITNESS: No.</p> <p>14 <b>Q (By Mr. Butler) At any time during the</b></p> <p>15 <b>time you were working at and with Sierra Townhomes,</b></p> <p>16 <b>did you believe that additional security was</b></p> <p>17 <b>necessary?</b></p> <p>18 A No. The hours that were covered in the</p> <p>19 evening seemed to be sufficient.</p> <p>20 <b>Q At any time during your time at Sierra</b></p> <p>21 <b>Townhomes, did you ever ask for more security?</b></p> <p>22 A No.</p> <p>23 <b>Q At any time during your time at Sierra</b></p> <p>24 <b>Townhomes, were you ever afraid because of the crime</b></p> <p>25 <b>and activity on the apartment complex's premises?</b></p>
<p>1 A It was over 300.</p> <p>2 <b>Q All right. Were there working cameras at</b></p> <p>3 <b>Lantana Apartments?</b></p> <p>4 MS. MORTON: Objection. Relevance.</p> <p>5 You can answer.</p> <p>6 THE WITNESS: I don't remember if</p> <p>7 there were cameras or not.</p> <p>8 <b>Q (By Mr. Butler) Were there fake dummies</b></p> <p>9 <b>cameras?</b></p> <p>10 A I don't --</p> <p>11 MS. MORTON: Same objection. You</p> <p>12 can answer.</p> <p>13 THE WITNESS: I don't recall.</p> <p>14 <b>Q (By Mr. Butler) Was there a courtesy</b></p> <p>15 <b>officer there at all times?</b></p> <p>16 MS. MORTON: Same objection. You</p> <p>17 can answer.</p> <p>18 THE WITNESS: We had a courtesy</p> <p>19 officer. He wasn't there at all times.</p> <p>20 <b>Q (By Mr. Butler) Was there ever an extended</b></p> <p>21 <b>period of time like weeks or months where there was</b></p> <p>22 <b>no courtesy officer?</b></p> <p>23 MS. MORTON: Same objection. You</p> <p>24 can answer.</p> <p>25 THE WITNESS: Not that I recall.</p>	<p>1 A I never felt afraid.</p> <p>2 <b>Q We talked about gunfire earlier. Did you</b></p> <p>3 <b>ever find or did you ever know of shell casings found</b></p> <p>4 <b>on the property?</b></p> <p>5 A I recall a -- an incident at the I</p> <p>6 Building where there had been some casings found at</p> <p>7 one time.</p> <p>8 <b>Q When was that?</b></p> <p>9 A It would have been approximately -- I came</p> <p>10 in October -- probably in November, end of October</p> <p>11 and November.</p> <p>12 <b>Q So around October or November of 2014, you</b></p> <p>13 <b>knew of shell cases -- casings being found on the</b></p> <p>14 <b>property of Sierra Townhomes?</b></p> <p>15 A Yes.</p> <p>16 <b>Q What was that about?</b></p> <p>17 A The reports that we received was that</p> <p>18 there were some unauthorized residents at a</p> <p>19 particular apartment, and the gentleman was standing</p> <p>20 outside shooting.</p> <p>21 <b>Q How many times did he shoot?</b></p> <p>22 A I don't recall or if I was ever told the</p> <p>23 number of times or if anybody knew the number of</p> <p>24 times.</p> <p>25 <b>Q How many shell casings were there?</b></p>



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1 A I don't know.

2 **Q And when we say "shell casings," we're**

3 **talking about the little brass piece that's left**

4 **after its gun is fired, and the piece that lay on the**

5 **ground for some, right?**

6 A Yes. I understand that.

7 **Q Okay. What did Sierra Townhomes do in**

8 **response to finding the shell casings on the ground?**

9 A When we first found out about that, we

10 tried to contact the resident in that particular

11 apartment. We spoke with him. We actually started

12 eviction proceedings on him because of the

13 unauthorized persons. Then shortly after that, that

14 gentleman, he left. He just -- he went on and left,

15 but the authorized persons were still in there.

16 So we did contact Captain Cotton Tukes at

17 South Fulton precinct to see if there was anything

18 they could help us do to speed up the eviction. And

19 they actually sent -- I don't know what you call it.

20 It was some special unit they have. They came out,

21 but they were unable to go and do anything to help

22 us, legally, because the original resident had been

23 seen, you know, in the unit within a 24-hour period.

24 But then, ultimately, the eviction was

25 carried out. We boarded up the unit for a period of

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1 time just to let people know, okay, there's nobody

2 here, don't come back here to hang out. And then we

3 moved on.

4 **Q Captain who?**

5 A Cotton Tukes.

6 **Q How do you spell Tukes?**

7 A T-u-k-e-s.

8 **Q And when did you contact Captain Cotton**

9 **Tukes?**

10 A I don't remember the exact date. It would

11 have been, possibly, November.

12 **Q Okay. Somewhere around November 2014?**

13 A Yes.

14 **Q When you -- when you contacted Captain**

15 **Cotton Tukes, what did you say?**

16 A Well, Mr. Soltani had the first

17 conversation with the captain.

18 **Q Okay.**

19 A And that's when the special team was sent

20 out. And they actually came twice. They have the

21 tactical gear, real scary.

22 **Q What did Mr. Soltani communicate to**

23 **Captain Tukes?**

24 A He explained --

25 MS. MORTON: Object to the form.

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1 Calls for speculation. You can answer.

2 THE WITNESS: From my understanding,

3 what he -- you know, he contacted them

4 about the incident. Mr. Soltani asked me,

5 you know, what residents had told me, and

6 you know, we started the eviction process.

7 And unfortunately, in Fulton County, from

8 around November 15th until the first week

9 of January, they do not execute any

10 evictions, the actual setting out. They

11 just stopped. So we knew at that

12 particular time, if we could not get them

13 out, that there was a possibility that

14 these people could still sit in there until

15 January. So we were just -- you know, she

16 -- he was just calling saying, Hey, is

17 there anything you guys can do. And the

18 only way they were able to help us is if

19 the actual leaseholder had left and vacated

20 and had not come back. They were willing

21 to come in, enter the unit. And if these

22 unauthorized persons that were in there,

23 then they were willing to have them, you

24 know, removed from the property so we could

25 take possession and change locks. But

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1 because a resident stated that that

2 original resident had been seen two days

3 prior, they would not do it.

4 **Q (By Mr. Butler) They wouldn't do what?**

5 A They would not -- they would not go in.

6 We had to go through the eviction process because we

7 had already started.

8 **Q You said there was a team that came out**

9 **twice. When did the team come out?**

10 A It would have been in that November -- and

11 like I said, I don't -- I just don't really recall

12 the exact dates, but they came out on two different

13 occasions to see if they could find, you know, these

14 people and get them off the property.

15 **Q Anyway then, by December of 2014, the**

16 **police teams were not coming out anymore? That was**

17 **over by then?**

18 A Yes. And we -- we did finally get -- I

19 don't recall the exact date, but we did get

20 possession of that unit. And -- but the utilities --

21 once utilities were cut off, we could consider it

22 abandoned, according to the provisions of our lease,

23 we got possession then and boarded the unit up.

24 **Q All right. To clean it up, by the middle**

25 **of December 2014, the -- both of the teams that came**

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1 out from the police force had already come out and  
 2 they were not coming back; is that true?  
 3 A To my knowledge, yes.  
 4 Q All right. After the teams had come out  
 5 -- well, strike that.  
 6 I guess, had you communicated with -- did  
 7 -- you, at some point, talked to Captain Tukes,  
 8 right?  
 9 A Yes.  
 10 Q Was that before or after the teams came  
 11 out?  
 12 A It was after the teams came out. My  
 13 concern was that once we boarded up, you know, the  
 14 unit, that these people still may come back on the  
 15 property. And didn't know if they would be angry,  
 16 upset, you know, that type thing. So I spoke to her  
 17 about extra patrols. I did explain to her that we  
 18 were between, you know, courtesy officers, and that  
 19 it would be extremely helpful. So she then told me  
 20 that, you know, I needed to make the request in  
 21 writing, and they have, like, a website you go on  
 22 where you request for, you know, additional patrols.  
 23 Q Uh-huh.  
 24 A And I did that. And they did send some  
 25 unmarked cars several times during the day and in the

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1 evening hours.  
 2 Q When you were communicating with the  
 3 police, what did you tell them about the problem?  
 4 A I explained to them that, you know, these  
 5 persons were on the property and, you know, living in  
 6 a unit unauthorized. That the resident had left or  
 7 so-called had left, but, you know, was coming back  
 8 periodically. And that there's been, you know,  
 9 reports of gunfire, that the guy was just, you know,  
 10 going outside and shooting.  
 11 Q Uh-huh.  
 12 A And, you know, it was concerning, so we  
 13 needed some additional patrol.  
 14 Q How often was he going out and shooting?  
 15 A I can recall three different times that it  
 16 was reported to the office.  
 17 Q Do you know of any times, other than those  
 18 three times, it was reported to the office?  
 19 A Off the top of my head, I remember three,  
 20 three different occasions.  
 21 Q So is this just three times, or was it  
 22 like an every weekend kind of thing?  
 23 A It wasn't an every weekend.  
 24 Q Okay. Did -- were tenants or people who  
 25 worked at Sierra Townhomes telling you or telling

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1 anyone that they were scared?  
 2 MS. MORTON: Object to the form to  
 3 the extent it calls for speculation. You  
 4 can answer.  
 5 THE WITNESS: The family that lived  
 6 next door to this particular apartment,  
 7 they're -- they came to the leasing office.  
 8 They did say that they were frightened. We  
 9 did find out that there was some  
 10 questionable parts of their story because  
 11 her mother had been seeing the guy next  
 12 door. Anyway, some -- some type of little  
 13 lovers triangle thing, because they had  
 14 made some reports, the next door neighbor  
 15 -- and I cannot, for the life of me right  
 16 now, recall the name, made a report to the  
 17 police one night about gunfire. The police  
 18 were there, from my recollection, within a  
 19 5- to 10-minute time frame. And according  
 20 to the story they told with all this  
 21 gunfire, right in front of her door, they  
 22 found no shell casings. They found  
 23 nothing. They found nothing to  
 24 substantiate the story she had told. And  
 25 then we began to find out after that that,

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1 you know, she was basically lying on him  
 2 from that point on. Not to say that the  
 3 previous times there were some issues, but,  
 4 you know, all of the reports after that  
 5 were not validated. And no other residents  
 6 had heard anything at that particular time.  
 7 Q So you decided -- or you came to the  
 8 conclusion that much of the reports about this were  
 9 not true?  
 10 A After about the third time, yes.  
 11 Q Did you ever communicate that to the  
 12 police, that is to say -- let me strike it and do it  
 13 -- clean it up.  
 14 Did you ever tell the police that you  
 15 thought what had been going on or what had been  
 16 reported in connection with these shootings around  
 17 November 2014, was not actually correct?  
 18 A No. I never had that conversation.  
 19 Q Had you concluded that what had been going  
 20 on involved a lovers triangle?  
 21 A No. I do know that there was, in fact,  
 22 gunfire, but that some of the latter story had to do  
 23 with some personal vendetta, and about a lover's  
 24 triangle. Whatever.  
 25 Q So you don't doubt that the gunfire

<p style="text-align: right;">Page 137</p> <p>1 <b>occurred?</b></p> <p>2 A No, I don't.</p> <p>3 <b>Q What was I going to ask?</b></p> <p>4 <b>Okay. Was anybody threatened during this</b></p> <p>5 <b>process?</b></p> <p>6 A Not to my knowledge.</p> <p>7 <b>Q Did people who worked at Sierra Townhomes,</b></p> <p>8 <b>including management, which I guess would be you,</b></p> <p>9 <b>ever feel afraid during this process?</b></p> <p>10 A No -- I -- I mean, I can't speak for the</p> <p>11 others. I mean, I -- I did not feel frightened.</p> <p>12 <b>Q Okay. What about the -- when this person</b></p> <p>13 <b>is outside shooting, do you know where the bullets</b></p> <p>14 <b>went?</b></p> <p>15 A No, I don't.</p> <p>16 <b>Q Did anyone ever tell you where the bullets</b></p> <p>17 <b>went?</b></p> <p>18 A No.</p> <p>19 <b>Q Okay. You received a letter at one point</b></p> <p>20 <b>from Mike Rafi, who's sitting to my left, giving</b></p> <p>21 <b>Sierra Townhomes notice of the lawsuit we're here</b></p> <p>22 <b>about today. Do you remember that?</b></p> <p>23 A I remember receiving a letter. I don't</p> <p>24 remember the date.</p> <p>25 <b>Q It -- where it talks about preserving the</b></p>	<p style="text-align: right;">Page 139</p> <p>1 you know, 2014.</p> <p>2 <b>Q Oh, you mean the date in the letter</b></p> <p>3 <b>estimate -- as to the shooting --</b></p> <p>4 A As to the date of the incident. So --</p> <p>5 because -- because the -- the name, Antonio Payne, at</p> <p>6 that time, did not have any significance to me. And,</p> <p>7 you know, I'm looking at the date. So then when he</p> <p>8 heard the name, that's when he said they're talking</p> <p>9 about the incident that just happened. And then</p> <p>10 whoever I spoke to on the phone sent a corrected</p> <p>11 letter correcting the date.</p> <p>12 <b>Q Yeah. I think you actually spoke with</b></p> <p>13 <b>Mike Rafi --</b></p> <p>14 A Yeah.</p> <p>15 <b>Q -- of my office?</b></p> <p>16 A Yes.</p> <p>17 <b>Q Is that right?</b></p> <p>18 A Yeah. Because I -- I tried to get a</p> <p>19 police report for that time frame, nobody had</p> <p>20 anything for that time frame. I mean, I was like on</p> <p>21 a wild-goose chase for like a week and couldn't find</p> <p>22 anything for that time frame.</p> <p>23 <b>Q Uh-huh. That letter was sent February 2,</b></p> <p>24 <b>2015, and I think received by Sierra Townhomes</b></p> <p>25 <b>February 9th, 2015. Does that sound right?</b></p>
<p style="text-align: right;">Page 138</p> <p>1 <b>evidence and that kind of thing.</b></p> <p>2 A Yes.</p> <p>3 <b>Q Does that sound familiar?</b></p> <p>4 A Uh-huh.</p> <p>5 <b>Q You remember the letter?</b></p> <p>6 A Yeah.</p> <p>7 <b>Q After that, did you ever give a written or</b></p> <p>8 <b>verbal statement to an insurance company?</b></p> <p>9 A To an insurance company. I have not given</p> <p>10 a written statement. And the only person that I had</p> <p>11 talked to was Ms. Morton.</p> <p>12 <b>Q Okay. Other than Ms. Morton, or other</b></p> <p>13 <b>people who work in her office, who have you spoken</b></p> <p>14 <b>with about the legal claim that we're here about</b></p> <p>15 <b>today?</b></p> <p>16 A Mr. Soltani.</p> <p>17 <b>Q Okay. What did y'all talk about?</b></p> <p>18 A I told him we've gotten this letter</p> <p>19 because I -- the only thing that stands out about the</p> <p>20 letter, when it was first sent, the date was</p> <p>21 incorrect. And so I'm like wracking my -- you know,</p> <p>22 that's -- I picked up the phone and said, you know, I</p> <p>23 don't -- I wasn't here during that time, you know,</p> <p>24 what -- what went on. You know, do you recall this</p> <p>25 happening? And he said I don't recall anything from,</p>	<p style="text-align: right;">Page 140</p> <p>1 A It could have been.</p> <p>2 <b>Q I mean, you --</b></p> <p>3 A I mean, I -- I don't recall the exact</p> <p>4 date.</p> <p>5 <b>Q Okay. Do you recall receiving a corrected</b></p> <p>6 <b>letter with the corrected date via fax?</b></p> <p>7 A Yes.</p> <p>8 <b>Q And that -- does February 9, 2015 sound</b></p> <p>9 <b>correct for that?</b></p> <p>10 A It's around that time.</p> <p>11 <b>Q Okay. Who owns Vesta Gardens?</b></p> <p>12 A Soltani Investment Group.</p> <p>13 <b>Q Does Vesta Gardens and Soltani Insurance</b></p> <p>14 <b>Group -- or, excuse me. Do Vesta Gardens and Soltani</b></p> <p>15 <b>Investment Group have an insurance policy like AMA</b></p> <p>16 <b>Godby and Sierra Townhomes do?</b></p> <p>17 MS. MORTON: Objection. Relevance.</p> <p>18 You can answer if you know.</p> <p>19 THE WITNESS: I mean, yeah -- I</p> <p>20 mean, they've got insurance.</p> <p>21 <b>Q (By Mr. Butler) Do you know the details of</b></p> <p>22 <b>the policy?</b></p> <p>23 A No, I don't.</p> <p>24 <b>Q I'm going to show you -- well, I'll find</b></p> <p>25 <b>the actual exhibit. We have earlier discussed</b></p>

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1 **Plaintiff's Exhibit I, as in India. And I'm handing**  
 2 **you the exhibit again.**  
 3 **Who found that document? What I mean is,**  
 4 **someone had to find that document in order to send it**  
 5 **to my office. Who found it?**  
 6 A I -- there was multiple boxes after the  
 7 sale of Sierra that had, you know, information that  
 8 was needed, I guess, for this case. And it must have  
 9 been in there. I personally did not go through every  
 10 single document.  
 11 **Q Who did?**  
 12 MS. MORTON: I'm going to object to  
 13 the extent that it gets into  
 14 attorney/client. And it calls for  
 15 speculation.  
 16 THE WITNESS: I don't know. I just  
 17 turned the box over and, you know, said  
 18 here is what I have, you know, that we took  
 19 from the property. Everything else is at  
 20 Sierra Townhomes. And if you have it, I'm  
 21 assuming it was in the box.  
 22 **Q (By Mr. Butler) All right.**  
 23 A In one of the boxes.  
 24 **Q Where was the box that you turned over?**  
 25 **Where had you been keeping it?**

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1 A The third floor office is where we filed  
 2 older documents, dead files, you know, residents who  
 3 had moved out. That type thing.  
 4 **Q Okay. Third floor office is where?**  
 5 A Sierra Townhomes.  
 6 **Q So you turned over that box of documents**  
 7 **at what time? Before or after the sale of Sierra**  
 8 **Townhomes?**  
 9 A It was after the sale.  
 10 **Q Oh, okay. So where had the box been**  
 11 **between the sale and the time that you turned it**  
 12 **over?**  
 13 A I had taken it over to Sier -- to Vesta  
 14 Gardens with me.  
 15 **Q Okay. Where in Vesta Gardens did you keep**  
 16 **it?**  
 17 A In the back office there.  
 18 **Q How did you decide at the time Sierra**  
 19 **Townhomes had sold, what documents to take and what**  
 20 **documents to leave?**  
 21 A When we were notified of the lawsuit, we  
 22 just kind of assumed that any of the courtesy officer  
 23 logs may be important, any of those documents. So  
 24 all the boxes that I found that said, you know,  
 25 anything to do with the security logs, they normally

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1 would stay with the property, but I -- I took them,  
 2 so we would have them. And it was all I could find.  
 3 **Q So you looked for the security logs,**  
 4 **right?**  
 5 A Yes.  
 6 **Q And took those boxes?**  
 7 A Yes.  
 8 **Q Did you look for anything else?**  
 9 A We took the last year's payables with us.  
 10 **Q Okay. Security logs and last year's**  
 11 **payables. Anything else?**  
 12 A We took personnel files for the existing  
 13 persons, boxes of forms and documents that we use.  
 14 **Q What did you leave?**  
 15 A We left all current resident files, all  
 16 documents that were on the computer, memos, you know,  
 17 certain form letters that are used. You know, we  
 18 left a lot of the -- the dead files, as we call them.  
 19 And then they even have some of the payable files  
 20 from previous years.  
 21 **Q Did you look through the computer before**  
 22 **you sold Sierra Townhomes to see what might be worth**  
 23 **saving or what maybe Sierra Townhomes should save?**  
 24 A I didn't.  
 25 **Q To the best of your knowledge, did anyone?**

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1 A I don't know if anybody did.  
 2 **Q Do you know of anyone looking through**  
 3 **Sierra Townhomes' e-mails before the property changed**  
 4 **hands?**  
 5 A I mean, if there was an e-mail -- I mean,  
 6 I did get some e-mail addresses before we sold the  
 7 property.  
 8 **Q What e-mail addresses did you get?**  
 9 A Just some of the case workers.  
 10 **Q Okay. In terms of saving documents for**  
 11 **this case, did you, or to the best of your knowledge,**  
 12 **anyone else, go through the e-mails saved stuff?**  
 13 A Not to my knowledge.  
 14 **Q Okay. Did Sierra -- strike that.**  
 15 **Okay. When was the last time that -- did**  
 16 **Sierra Townhomes have an e-mail address -- or like an**  
 17 **e-mail that they used?**  
 18 A Yes.  
 19 **Q What was it -- what was the address?**  
 20 A Sierra.townhomes@yahoo.com.  
 21 **Q You had access to that?**  
 22 A Up until the sale.  
 23 **Q Okay. When was the last time that you got**  
 24 **into it?**  
 25 A Probably -- I don't remember the exact

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<p>1 closing date, but up until -- you know, I was sending 2 e-mails from there to the new, you know, ownership. 3 <b>Q Have you accessed it since the property</b> 4 <b>changed hands?</b> 5 A I don't recall. I think maybe the first 6 week I was phoned and asked for a document. And then 7 they were given the password. 8 <b>Q Okay. So you think you gave the password</b> 9 <b>to the new owner in the first week after the property</b> 10 <b>changed hands; is that right?</b> 11 A Yes. 12 <b>Q Okay. Let's talk about some lights. We</b> 13 <b>talked about light checks earlier, briefly, when we</b> 14 <b>were looking at that map, right?</b> 15 A Yes. 16 <b>Q Sierra Townhomes did regular lighting</b> 17 <b>checks, right?</b> 18 A Yes. 19 <b>Q And the purpose of that is to make sure</b> 20 <b>that the lights are working, correct?</b> 21 A Yes. 22 <b>Q I'm going to show you what I've marked as</b> 23 <b>Plaintiff's Exhibit J as in Juliette.</b> 24 <b>(Exhibit J was marked for</b> 25 <b>identification.)</b></p>	<p>1 particular day. 2 <b>Q Other than it being an attachment, does</b> 3 <b>this look like the way Sierra Townhomes kept them?</b> 4 A Yes. 5 <b>Q Okay. Let's look through them. We'll go</b> 6 <b>one by one. And I want to focus on Building B. Now</b> 7 <b>some of these have dates and some do not, but we'll</b> 8 <b>just go through them. The top sheet here says "key,"</b> 9 <b>right?</b> 10 A Uh-huh. 11 <b>Q And this looks --</b> 12 MS. MORTON: Make sure you say yes 13 or no. 14 <b>Q (By Mr. Butler) -- like the key that you</b> 15 <b>use for subsequent maps, right?</b> 16 A Yes. 17 <b>Q All right. Let's go to the first one.</b> 18 <b>There's no date on this one, right? Is it correct --</b> 19 A Oh, yes, there's no date. 20 <b>Q All right. Let's look at Building B.</b> 21 A Okay. 22 <b>Q And right next to Building B, it says</b> 23 <b>"check maintenance," right?</b> 24 A Yes. 25 <b>Q And then there's some scribbles over the</b></p>
<p>1 <b>Q (By Mr. Butler) And these are documents</b> 2 <b>that were produced, that is to say, evidence that was</b> 3 <b>given to my office in this lawsuit. Does that look</b> 4 <b>right to you?</b> 5 A Yes. 6 <b>Q You might have been the one who found</b> 7 <b>these. I don't know.</b> 8 A If they were in the boxes. 9 <b>Q Okay. Do you recognize this, and this</b> 10 <b>looks like the lighting check maps that Sierra</b> 11 <b>Townhomes did, right?</b> 12 A Yes. They would be attached to that 13 particular patrol log. It's hard to tell because 14 they go with the courtesy officer log for that 15 particular day. 16 <b>Q Okay. Well, I'll -- I'll tell you this is</b> 17 <b>how we received them. Other than being attached to</b> 18 <b>the courtesy log, are the documents collected in</b> 19 <b>Plaintiff's Exhibit J here, appearing the way that</b> 20 <b>Sierra Townhomes kept them in the regular course of</b> 21 <b>business?</b> 22 A Well, like I -- like I just said, they 23 normally would be attached with that particular day's 24 log sheet, because we have certain days where 25 lighting is checked and it would be attached to that</p>	<p>1 <b>marks on the side of the clubhouse next to the pool,</b> 2 <b>right?</b> 3 A Yes. 4 <b>Q Does that mean those lights are out?</b> 5 A It would appear it says "check 6 maintenance." To have maintenance check that 7 particular light. 8 <b>Q And then also the light by the laundry is</b> 9 <b>apparently out. That's what this record indicates,</b> 10 <b>correct?</b> 11 A Yes. 12 <b>Q And then on Building B, there's a light</b> 13 <b>that's been scribbled over indicating that it was</b> 14 <b>out, correct?</b> 15 A Yes. 16 <b>Q Then on Building A, there's another light</b> 17 <b>that's out, correct?</b> 18 A Yes. 19 <b>Q So on this one, on this first -- or excuse</b> 20 <b>me, second page of Plaintiff's Exhibit J, there are</b> 21 <b>lights on or near Building B that are not working,</b> 22 <b>correct?</b> 23 A Correct. 24 <b>Q Let's go to number two. Or excuse me, go</b> 25 <b>to the third page. Now, I'm going to keep a tally.</b></p>

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1 **And we'll do it on an exhibit so you can watch me.**  
 2 And I'm going to have two columns on this sheet of  
 3 paper. And one will say lights on or near Building  
 4 B, not working. And the other column will say lights  
 5 on or near Building B, are working. See what I've  
 6 done?  
 7 A Uh-huh. Yes.  
 8 **Q And now, for that first one, I'm going to**  
 9 **put a tally in this -- in the "not" column. I want**  
 10 **you to watch me as I do this because later I'm going**  
 11 **to ask you if I did it right.**  
 12 **All right. So let's go to the next page,**  
 13 **which is the third page on Plaintiff's Exhibit J. If**  
 14 **we look on Building B, the light on Building B has**  
 15 **been scribbled out, right?**  
 16 A Yes.  
 17 **Q So that goes in the "not working" column,**  
 18 **correct?**  
 19 A Yes.  
 20 **Q All right. Let's go to the next page. On**  
 21 **this one, the light on Building B has been scribbled**  
 22 **out, right?**  
 23 A Yes.  
 24 **Q So this goes in the not column, right?**  
 25 A Yes.

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1 **Q Let's go to the next page. Here, there's**  
 2 **the scribble, so this goes in the "not working"**  
 3 **column, right?**  
 4 A What page are you on?  
 5 **Q Well, they're not marked, but it's this**  
 6 **page that says at the bottom in blue, "Called 7/23/14**  
 7 **C-C, three to five business days."**  
 8 A Okay.  
 9 **Q Are we on the same page?**  
 10 A Yes.  
 11 **Q All right. On this one, the lights on**  
 12 **Building B are not working, correct?**  
 13 A Yes.  
 14 **Q And the same is actually true, the column**  
 15 **says, on or near for the building near Building B,**  
 16 **right?**  
 17 A Yes.  
 18 **Q So this goes in the "not working" column,**  
 19 **correct?**  
 20 A Yes.  
 21 **Q All right. We're at four now. Now, if we**  
 22 **come to the next page, there are, really in the**  
 23 **vicinity of Building B, most of the lights were**  
 24 **working, right?**  
 25 A Yes.

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1 **Q So there's a light out by the laundry**  
 2 **facility, right?**  
 3 A Yes.  
 4 **Q But we won't count that, so let's put this**  
 5 **in the lights on near Building B are working**  
 6 **category. Have I made that tally mark?**  
 7 A Yes.  
 8 **Q All right. Let's go to the next page.**  
 9 **And here, again, the lights around Building B appear**  
 10 **to be working; is that correct?**  
 11 A Yes.  
 12 **Q So we'll put this in the are working**  
 13 **category. Let's go to the next page. Here, again,**  
 14 **we have a -- we have a are working, correct?**  
 15 A Yes.  
 16 **Q All right. We'll put that in the are**  
 17 **working category. The next page. This is another**  
 18 **one where they are working, correct?**  
 19 A Yes.  
 20 **Q All right. Have I tallied it correctly so**  
 21 **we're now four and four?**  
 22 A Yes.  
 23 **Q Well, I have messed up in the way I wanted**  
 24 **to conduct this. The -- because I wanted to talk**  
 25 **differently about the laundry ones. Anyway, let's go**

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1 **through it and we'll talk to me. I will stop with my**  
 2 **tallies, because I have not done it the way I**  
 3 **intended to. We stopped -- show me the page we**  
 4 **stopped on.**  
 5 **All right. That says all Georgia Power**  
 6 **lights are working. All right. Let's go to the page**  
 7 **after that. And here we have a good light check,**  
 8 **right? Everything seems to be working?**  
 9 A Yes.  
 10 **Q All right. Let's go to the next page.**  
 11 **Here we have lights out on the clubhouse, two lights**  
 12 **out on the laundry, and no lights by Building M; is**  
 13 **that right?**  
 14 A Yes.  
 15 **Q And also no lights on Building J; is that**  
 16 **right?**  
 17 A Yes. These are actual building lights.  
 18 **Q Yeah.**  
 19 A Just on the buildings.  
 20 **Q Right. All right. Let's go to the next**  
 21 **page. Here we still have lights out on the leasing**  
 22 **office or clubhouse, lights out on the laundry**  
 23 **building, lights out on Building M, and lights out on**  
 24 **Building J; is that correct?**  
 25 A Yes.

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1 **Q** Next page. Here we also -- we again have  
 2 lights out on the clubhouse, lights out on the  
 3 laundry building, lights out on Building M, lights  
 4 out on Building L, and lights out on Building J. Is  
 5 that right?  
 6 A Yes.  
 7 **Q** Next page. Here we have a big area where  
 8 the lights are out on the side of the apartment  
 9 complex opposite the words Sierra Townhomes, right?  
 10 A Yes. The Georgia Power lights.  
 11 **Q** Yeah. And that whole -- that big shaded  
 12 area indicates that lights are out, correct?  
 13 A Yes.  
 14 **Q** All right. Let's go to the next page.  
 15 Here, again, we have lights out by the clubhouse, on  
 16 the laundry building, on Building M, on Building L,  
 17 and on Building J, correct?  
 18 A Yes.  
 19 **Q** Next page. Here we got lights out on the  
 20 clubhouse or leasing office, on the laundry, on  
 21 Building M, and on Building J, correct?  
 22 A Yes.  
 23 **Q** And there's actually an area that says  
 24 it's very dark in this area, sort of between Building  
 25 O and the laundry, right?

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1 A Yes.  
 2 **Q** Let's go to the next page. Here, again,  
 3 we got lights out on the clubhouse, on the laundry,  
 4 on Building M, and Building J, correct?  
 5 A Yes.  
 6 **Q** Do you know what that circle means by  
 7 Building K?  
 8 A I don't.  
 9 **Q** This would be -- there's a date on this  
 10 one that says March 25, 2015; is that right?  
 11 A Yes.  
 12 MS. MORTON: No. We're not looking  
 13 at the same page. Are you looking at a  
 14 different date?  
 15 MR. BUTLER: I think you're on a  
 16 different page. Wait.  
 17 MR. RAFI: No, other corner. Other  
 18 corner.  
 19 MR. BUTLER: Yeah, there's --  
 20 MR. RAFI: Erica, go to other  
 21 corner.  
 22 MS. MORTON: Well, what are you  
 23 asking about the date? Maybe --  
 24 MR. BUTLER: Let's just clean this  
 25 up.

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1 **Q** There's an asterisk here on the left side  
 2 of the page, correct?  
 3 A Yes.  
 4 **Q** And it says March 24, 2015 on that side of  
 5 the page, right?  
 6 A Yes.  
 7 **Q** That would be during your time at Sierra  
 8 Townhomes, right?  
 9 A Yes.  
 10 **Q** All right. Go to the next page. Here we  
 11 have lights out on the clubhouse or leasing office,  
 12 right?  
 13 A Yes.  
 14 **Q** And the laundry?  
 15 A Yes.  
 16 **Q** And Building M?  
 17 A Yes.  
 18 **Q** And Building J?  
 19 A Yes.  
 20 **Q** And the mysterious circle by Building K?  
 21 A Yes.  
 22 **Q** Next page. Lights out on the clubhouse,  
 23 laundry, Building M, Building J, and Building L,  
 24 correct?  
 25 A Yes.

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1 **Q** Next page. Lights out on the clubhouse,  
 2 laundry, Building M, Building L, and that's it,  
 3 right?  
 4 A Yes.  
 5 **Q** And there's a circle by Building K,  
 6 correct?  
 7 A Yes.  
 8 **Q** Last page. We got lights out on Building  
 9 B, by the laundry, on Building M, on Building L; is  
 10 that correct?  
 11 A Yes.  
 12 **Q** Does it appear from what we've just  
 13 reviewed that there are areas in Sierra Townhomes  
 14 where the lights were consistently not working?  
 15 MS. MORTON: Object to the form. It  
 16 calls for speculation. You can answer.  
 17 THE WITNESS: Without the dates on  
 18 each of these, I don't know how long this  
 19 spans.  
 20 **Q** (By Mr. Butler) Do you agree that it was  
 21 common for lights to not be working in at least the  
 22 following areas: Clubhouse, laundry, Building M,  
 23 Building J?  
 24 MS. MORTON: Same objection. You  
 25 can answer.

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1 THE WITNESS: Yes, according to  
 2 what's here in front of me.  
 3 **Q (By Mr. Butler) All right. Without**  
 4 **telling me what you said, when was the first time you**  
 5 **met with Ms. Morton who represents AMA Godby or**  
 6 **anyone who works with her?**  
 7 A I don't recall the exact date. It was  
 8 after we received a notification. It was turned over  
 9 to the in -- the letter was turned over to the  
 10 insurance company. And then Mr. Soltani informed me  
 11 that Ms. Morton, along with some other folks with,  
 12 you know -- some of her associates would be coming to  
 13 the leasing office, and to, you know, give them what  
 14 information we had and, you know, to cooperate.  
 15 **Q Did you --**  
 16 A And I don't remember the date.  
 17 **Q Approximately February 2015 sound about**  
 18 **right?**  
 19 A I believe it was in February.  
 20 **Q Okay. So Ms. Morton -- did Ms. Morton**  
 21 **come to Sierra Townhomes in February?**  
 22 A Yes. If that was the date that she came,  
 23 then, yes. I mean, she did come.  
 24 **Q Okay. In terms of collecting evidence**  
 25 **that was there, what did y'all collect?**

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1 A There were some resident files that we  
 2 pulled.  
 3 **Q Let me see if I can save you time. Is**  
 4 **this the same evidence we talked about earlier?**  
 5 A No.  
 6 **Q Okay. Go ahead then. Let me ask the**  
 7 **question again so we get the clean record.**  
 8 **In terms of collecting evidence, what**  
 9 **evidence did y'all collect when Ms. Morton came to**  
 10 **Sierra Townhomes around February 2015?**  
 11 A We collected -- I mean, I -- the files for  
 12 everyone that lived in the B building.  
 13 **Q Uh-huh.**  
 14 A And that's -- that's all I remember at  
 15 that particular time.  
 16 **Q Okay. How -- what other times have you**  
 17 **met with Ms. Morton or folks from her office?**  
 18 A Maybe three or four times.  
 19 **Q All right. When was the next time, to the**  
 20 **best of your recollection?**  
 21 A I recall, I think, back at Sierra. And  
 22 then we had a meeting, we had a meeting where we all  
 23 met over at Vesta Gardens.  
 24 **Q Okay. The next meeting at Sierra,**  
 25 **approximately when was that?**

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1 A I don't remember. I know it was before  
 2 May.  
 3 **Q Okay. Sometime between February of --**  
 4 **obviously it was sold then --**  
 5 A I mean, I know it was before May.  
 6 **Q All right. Sometime between February and**  
 7 **May 2015 was the next meeting between -- that**  
 8 **involved you and Ms. Morton at Sierra Townhomes?**  
 9 A Yes.  
 10 **Q And then you met at Vesta Gardens you**  
 11 **said?**  
 12 A Yes.  
 13 **Q Approximately when was that?**  
 14 A Maybe the tail end of September. It was  
 15 in -- it was in September, but I don't remember --  
 16 **Q That's 2015 obviously --**  
 17 A -- when. Yeah, 2015. Yes.  
 18 **Q Without telling me the specifics of what**  
 19 **you discussed, were you talking about this case that**  
 20 **we're here on today?**  
 21 A Yes.  
 22 **Q Were you seeking legal advice?**  
 23 A Yes.  
 24 **Q And then -- so we've got two meetings at**  
 25 **Sierra Townhomes, one at Vesta Gardens. When else**

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1 **have you met with Ms. Morton or someone else from her**  
 2 **office?**  
 3 A I think that's it. So it was only two  
 4 others. So a total of three times.  
 5 **Q Did you meet with Ms. Morton or anyone**  
 6 **from her office any time in the last seven days?**  
 7 A No.  
 8 **Q Did you meet with Ms. Morton or anyone**  
 9 **from her office today, before this deposition?**  
 10 A I got here at 9:15. I saw her.  
 11 **Q Okay. Did -- when you got here at 9:15,**  
 12 **did you discuss with her, again, without telling me**  
 13 **the specifics, this deposition?**  
 14 MS. MORTON: I'm just going to  
 15 object to the extent it will require her to  
 16 invade attorney/client if you answer that,  
 17 but if there's an answer without doing  
 18 that, please give it.  
 19 THE WITNESS: She was just telling  
 20 me that not to be nervous. Just to, you  
 21 know, answer truthfully and, you know --  
 22 **Q There's nothing wrong with that.**  
 23 A Yeah.  
 24 **Q Now there may be other things you said**  
 25 **that we're going to take issue with later, but**



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1 there's nothing wrong with her telling you about the  
 2 deposition, don't be nervous and all that kind of  
 3 stuff. So I'm not fussing when I say that to you.  
 4 But it sounds like this morning, you discussed this  
 5 deposition. Is that fair?  
 6 A Yes.  
 7 Q During breaks in this deposition, have you  
 8 and Ms. Morton discussed this deposition?  
 9 A No.  
 10 Q During lunch or any other time?  
 11 A No.  
 12 Q When you met -- have you and Ms. Morton  
 13 discussed this deposition on any occasion, other than  
 14 this morning?  
 15 A I need to go back. We did -- we did meet  
 16 -- we did meet in the last seven days. I'm sorry.  
 17 Q Okay. Tell me when it was.  
 18 A Monday.  
 19 Q And that was here at this office, right?  
 20 A Yes.  
 21 Q Where we are now, which is Ms. Morton's  
 22 office?  
 23 A Yes.  
 24 Q When you -- and did you discuss this  
 25 deposition at that time?

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1 A Yes.  
 2 Q When you discussed this deposition, did  
 3 you review any documents?  
 4 A No.  
 5 Q Did you listen to any recordings?  
 6 A Yes.  
 7 Q What recordings?  
 8 A It was a video on what to expect when  
 9 you're being deposed.  
 10 Q All right. I love to ask about that, but  
 11 that, I cannot. Did you listen to any recordings or  
 12 watch any videos related to the substance of this  
 13 case, as opposed to depositions generally?  
 14 A No.  
 15 Q All right. Let's talk about crime.  
 16 During -- let's go back to November of 2014.  
 17 Do you know of any crime or dangerous  
 18 activity going on at Sierra Townhomes during November  
 19 of 2014?  
 20 MS. MORTON: Object to the form of  
 21 the question. You can answer.  
 22 THE WITNESS: I'm not sure to the  
 23 specific dates, but there were some things  
 24 that were happening at that particular  
 25 time.

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1 Q (By Mr. Butler) What comes to mind?  
 2 A The -- you know, the reports of the  
 3 gunfire.  
 4 Q Uh-huh.  
 5 A Then, you know, after that, the -- the  
 6 break-ins from the patios. There was a gentleman in  
 7 Apartment D-1 who was killed. And we had some domest  
 8 -- and we had a domestic issue with a particular  
 9 resident and some domest -- domestic violence. And  
 10 that's all I can recall.  
 11 Q All right. I tried to make a list. I've  
 12 got four. Someone was killed in D-1, correct?  
 13 A Uh-huh.  
 14 Q There's a domestic --  
 15 A Yes.  
 16 Q -- issue? There was the stealing. And  
 17 this is where, I think, someone was keeping stolen  
 18 property in one of the apartments; is that right?  
 19 A Yes.  
 20 Q And there was the issue of the gunshots  
 21 that we've already talked about, right?  
 22 A Yes.  
 23 Q Did I miss anything in that list of four?  
 24 A No.  
 25 Q All right. What do you know about the

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1 time that someone was killed in D-1?  
 2 A This particular resident was on the  
 3 Georgia Housing Georgia Voucher Program. His -- he  
 4 had not reported to his case worker, which was odd  
 5 for him, so she phoned us and asked if, you know, we  
 6 had heard, seen from him. We had not. So she came  
 7 to the property, you know, knocked on the door,  
 8 couldn't get in. So we got our key, went in, and  
 9 that's when he was found deceased. And --  
 10 Q Who found him deceased?  
 11 A I was not on the property that particular  
 12 day. I know the case worker went, I think, along  
 13 with a member of maintenance. So I don't know who  
 14 saw him first or, you know -- or any of that.  
 15 I still don't know the method of how he  
 16 was killed. A detective came a couple of days later,  
 17 and I know after this happened, we talked to the next  
 18 door neighbor, Ms. Earline Howell. She's lived on  
 19 the property over 25 years. And she gave some  
 20 information to the police that was helpful. And then  
 21 several weeks later, the detective came back and, you  
 22 know, they were looking for his girlfriend, that she  
 23 was the suspect. And, you know, the last one seen,  
 24 and the next door neighbor saw her drive off very  
 25 quickly. And that was the last time that the next

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1 door neighbor had seen him.

2 **Q Do you know who killed the resident in**

3 **D-1?**

4 A No, I don't.

5 **Q Do you know why the resident in D-1 was**

6 **killed?**

7 A No, I don't.

8 **Q Okay. You mentioned a domestic issue.**

9 **Tell me what you know about that, please.**

10 A That was -- I forget the building. It was

11 a boyfriend and girlfriend; they got in a fight.

12 **Q Anybody hurt?**

13 A No.

14 **Q Any violence used?**

15 A Evidently, boyfriend came, found her with

16 somebody else. There was two guys fighting out in

17 the front of the lawn, and we called the police and

18 they came and got them.

19 **Q I see you waving your hand. Is that -- is**

20 **dude's fighting in the lawn an unusual thing?**

21 A Yes.

22 **Q It is?**

23 A It's very unusual.

24 **Q Okay. Let's see. We've talked some about**

25 **the stealing. Approximately how many apartments were**

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1 **broken into at Sierra Townhomes?**

2 MS. MORTON: Objection. Vague.

3 MR. BUTLER: Yeah. Let me clean it

4 up.

5 **Q (By Mr. Butler) Approximately how many**

6 **apartments were broken into in Sierra Townhomes, in**

7 **connection with the problems occurring around**

8 **November 2014, where there was stolen property being**

9 **stored in one of the apartments?**

10 MS. MORTON: Objection to the extent

11 that I think it may misstate the evidence,

12 but go ahead. You can answer.

13 THE WITNESS: I want to say four

14 units.

15 **Q (By Mr. Butler) Okay. All right. All**

16 **right. Let's go on to December 14, and I'll ask the**

17 **question. New paragraph.**

18 **What violent crime or other events, that**

19 **might have an impact on the safety of tenants or**

20 **their guests, do you know about in December of 2014?**

21 A I don't remember the date when the first,

22 you know, break-in happened with the little kids, you

23 know, going through the patio doors. I don't

24 remember. I don't know if that started in December.

25 **Q Okay. Anything else?**

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1 A The -- you know, the gunfire.

2 **Q All right. So for violent crime or other**

3 **events that might have posed a risk to tenants or**

4 **their guests in December 2014, you know of the patio**

5 **door break-ins, and some of the gunfire we discussed.**

6 **Anything else?**

7 A That's all I can think of.

8 **Q All right. Let's talk about January 2015.**

9 And I'll exclude from this discussion the shooting

10 we're here about today, because everybody knows about

11 what happened to Antonio Payne. But in January 2015,

12 before Antonio Payne was killed on January 18, 2015,

13 what violent crimes or other events that might have

14 posed a safety threat to tenants or their guests do

15 you know about?

16 MS. MORTON: Object to the form.

17 Sorry. Did you say Mr. Payne was killed in

18 2015?

19 MR. BUTLER: Excuse me. Shot. Let

20 me run it back.

21 **Q (By Mr. Butler) I want to ask you about**

22 **January 2015 and the period before January 18, 2015**

23 **when Mr. Payne was shot.**

24 **During that period of January 1 to January**

25 **18, 2015, please, tell me about any violent crimes or**

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1 **other events that might pose a safety risk to tenants**

2 **or their guests at Sierra Townhomes?**

3 MS. MORTON: Objection to the extent

4 it calls for speculation. You can answer.

5 THE WITNESS: I'm not aware of any

6 others, other than what we've already

7 discussed.

8 **Q (By Mr. Butler) What have we already**

9 **discussed that fits in that window, aside from the**

10 **shooting of Antonio Payne?**

11 A The gunfire and the break-ins.

12 **Q So there was more gunfire and additional**

13 **break-ins, correct?**

14 A It's the -- from the -- the same ones that

15 we were talking about before. It's not additional.

16 **Q Okay. Did you and Mr. Soltani discuss the**

17 **man who was killed in D-1?**

18 A We did have a discussion.

19 **Q All right. What did you say?**

20 A We just discussed -- he asked me had any

21 detectives come by, had we found out, you know, what

22 happened, exactly what happened. And I explained to

23 him I only knew, from the last time I talked to the

24 detectives, that they were looking for the girlfriend

25 and her car, and that she had left Atlanta. And

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1 basically that was it. And we just discussed that,  
 2 you know, he was a really nice guy and that we felt  
 3 really bad about it.  
 4 **Q The guy that was killed in D-1 was a**  
 5 **really nice guy?**  
 6 A He was a really nice guy.  
 7 **Q Did you or, to your knowledge, Mr. Soltani**  
 8 **consider taking any additional security measures**  
 9 **after that guy was killed and Unit D-1 in November of**  
 10 **2014?**  
 11 MS. MORTON: Objection to form.  
 12 Calls for speculation. You can answer.  
 13 THE WITNESS: No, we didn't.  
 14 **Q (By Mr. Butler) After the domestic issue**  
 15 **in November 2014 that we discussed, did you or**  
 16 **Mr. Soltani, to the best of your knowledge, consider**  
 17 **adding any additional security measures?**  
 18 A No, we didn't.  
 19 **Q After the stealing, breaking in of patio**  
 20 **doors, and storage of stolen goods in an apartment,**  
 21 **did you or, to your knowledge, Mr. Soltani consider**  
 22 **additional security measures at Sierra Townhomes?**  
 23 A After the patio break-ins, we did go and  
 24 purchase additional poles, lumber, whatever, to  
 25 secure the patios, to make sure that they could not

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1 be opened from any way, whatsoever. And we installed  
 2 those on all of the units that had the patios behind  
 3 them, you know, behind the buildings, where they were  
 4 not visible, which -- because those were the ones  
 5 that were targeted.  
 6 **Q This would be the little wooden stick that**  
 7 **fits down under the track of the sliding door, I**  
 8 **think; is that right?**  
 9 A Yes. And then there was another piece as  
 10 well. And then everyone has a Charley bar as well.  
 11 **Q All right. Other than adding those pieces**  
 12 **to the sliding doors that you've already talked**  
 13 **about, did y'all consider any other additional**  
 14 **security measures foll -- following the patio door**  
 15 **break-ins and the storage of stolen goods in an**  
 16 **apartment?**  
 17 A No. Because the person that we -- that we  
 18 found was responsible, moved. They left the  
 19 property. They were given notice of criminal  
 20 trespass. And we had the courtesy officer at the  
 21 time, and he was well aware and looking out to make  
 22 sure that the young man never came back to the  
 23 property.  
 24 **Q And we talked -- we've talked several**  
 25 **times about the gunfire that was going on in November**

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1 **2014, December 2014, and January 2015, right?**  
 2 A Yes.  
 3 MS. MORTON: Object to the form.  
 4 **Q (By Mr. Butler) In response to that**  
 5 **gunfire, did you or, to your knowledge, Mr. Soltani**  
 6 **consider any additional security measures at Sierra**  
 7 **Townhomes?**  
 8 A Well, at that particular time, we were in  
 9 the process of, you know, vetting persons for the  
 10 courtesy officer position.  
 11 **Q The courtesy officer position had been**  
 12 **vacant since October of 2014, correct?**  
 13 A Yes. And we started looking prior to  
 14 sending Mr. Lassiter his letter.  
 15 **Q Okay. When was the first time, following**  
 16 **October 2014, that you or, to your knowledge,**  
 17 **Mr. Soltani started looking for a courtesy officer?**  
 18 MS. MORTON: Object to the form.  
 19 Misstates the evidence. Go ahead.  
 20 THE WITNESS: I believe the -- it  
 21 was the last week, you know, the latter  
 22 part of October, we put an ad on Craig's  
 23 List. And we started, you know, the --  
 24 getting e -- not e-mails, well some of them  
 25 were e-mails, resumes. And we have a

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1 process that we go through. We have like a  
 2 little checklist, questions. We call  
 3 asking people their work schedule, because  
 4 if somebody's working from 11 to 7, that's  
 5 not going to work for us, you know. We go  
 6 through and then we set up interviews and  
 7 we start the process. And we had already  
 8 started that.  
 9 And we actually found a courtesy  
 10 officer who went through the orientation  
 11 period, came to the property, was shown all  
 12 the checkpoints for the RDF -- RFID system.  
 13 And I completed his lease, we got his  
 14 apartment ready for him. And then the day  
 15 he was supposed to come sign everything, he  
 16 contacted Mr. Soltani and said he had  
 17 changed his mind. So we had to go and  
 18 start all over again.  
 19 **Q (By Mr. Butler) Do you know why it was**  
 20 **that that security officer -- when was that, that the**  
 21 **security officer changed his mind, to use your words?**  
 22 A It was -- I don't recall exactly, but I --  
 23 I believe he was -- he was interviewed in December,  
 24 the first part of December. I believe it was before  
 25 the holidays. And I think he was supposed to start

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1 in January, the first part of January.  
 2 **Q For that officer -- what was that guy's**  
 3 **name?**  
 4 A I don't remember his first name. His --  
 5 **Q Was it Rocky Phillips?**  
 6 A No. No, no, no. That's -- no. I think  
 7 he -- he patrolled for like a day or two for us.  
 8 Then it just -- it didn't work out. He didn't have a  
 9 car, and, you know, couldn't get to the property in  
 10 enough time. Clayton, his last name was Clayton. I  
 11 don't remember the first name.  
 12 **Q We'll call him Mr. Clayton. Do you know**  
 13 **why Mr. Clayton didn't want to work at Sierra**  
 14 **Townhomes?**  
 15 A I do not.  
 16 **Q Do you know why Mr. Rocky Phillips didn't**  
 17 **stick around at Sierra Townhomes?**  
 18 A He didn't have a car. He didn't -- he  
 19 didn't have transportation. And one of the first  
 20 days he was supposed to come, he said I'm going to be  
 21 late, I got to find a ride, you know, got to take the  
 22 bus. And, you know, we just saw that that was going  
 23 to end up being a problem.  
 24 **Q How was Mr. Rocky Phillips supposed to be**  
 25 **compensated?**

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1 A I did not -- was not in on the  
 2 compensation part. I don't know if he was going to  
 3 be given an apartment or if he was going to be paid.  
 4 **Q Okay. Mr. Clayton was going to be given**  
 5 **an apartment, but not paid; is that correct?**  
 6 A Correct.  
 7 **Q Do you have any reason to suspect that Mr.**  
 8 **Rocky Phillips was going to be paid?**  
 9 A I --  
 10 MS. MORTON: Objection. Calls for  
 11 speculation. You can answer.  
 12 THE WITNESS: I had a feeling that  
 13 he was going to be paid, but we had some  
 14 reservations because he didn't have  
 15 transportation, but we were going to give  
 16 him an opportunity. So he was going to be  
 17 paid, and then if it worked out, then he  
 18 would have been offered the apartment.  
 19 **Q (By Mr. Butler) When was the first time**  
 20 **following October of 2014, that someone who was**  
 21 **qualified for the position, applied to be a courtesy**  
 22 **officer at Sierra Townhomes?**  
 23 MS. MORTON: Objection. Calls for  
 24 speculation. You can answer.  
 25 THE WITNESS: I don't -- I don't

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1 recall the first date. It would have been,  
 2 you know, the first part of November.  
 3 **Q (By Mr. Butler) Okay. Was hiring a**  
 4 **courtesy officer a priority for Sierra Townhomes**  
 5 **after October of 2014?**  
 6 A Yes, it is. Yes, it was.  
 7 **Q And that was because of safety concerns,**  
 8 **correct?**  
 9 MS. MORTON: Object to the form of  
 10 the question. Calls for speculation. You  
 11 can answer.  
 12 THE WITNESS: Yes. We always want  
 13 to have a courtesy officer on -- on the  
 14 property.  
 15 **Q (By Mr. Butler) The reason for that is**  
 16 **safety, right?**  
 17 A Yes.  
 18 **Q Did tenants or people who worked at Sierra**  
 19 **Townhomes ever come to you and discuss concern about**  
 20 **gunshots on the property, other than the example we**  
 21 **already discussed?**  
 22 A I believe one afternoon, one of the  
 23 maintenance guys, I believe it was Pedro Guzman, came  
 24 and said that the guys that -- you know, the  
 25 unauthorized occupants from that particular apartment

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1 were, you know, standing out in front of the  
 2 building. And at that particular time, we -- you  
 3 know, he called the office. We called 911. And --  
 4 but by the time the police got there, they were gone.  
 5 **Q So that's a separate incident than the one**  
 6 **we already talked about, right?**  
 7 A Yes. But there was no gunfire. He just  
 8 said the guys were there.  
 9 **Q Okay. When was that?**  
 10 A I -- all I can tell you, it was between  
 11 November and the end of January.  
 12 **Q Other than the patio break-ins that we've**  
 13 **already discussed, did the tenants of Sierra**  
 14 **Townhomes or the people who worked at Sierra**  
 15 **Townhomes ever express concern to you about**  
 16 **break-ins?**  
 17 A They never expressed con -- well, we were  
 18 all concerned about the break-ins, but, you know,  
 19 they discussed who they thought was responsible for  
 20 -- for doing it. One of the maintenance guys did.  
 21 **Q Which maintenance guy was that?**  
 22 A Pedro.  
 23 **Q All right. And is this the same break-ins**  
 24 **we've already talked about or a different set?**  
 25 A Same break-ins.

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1 **Q All right. How many break-ins would you**  
 2 **estimate there were at Sierra Townhomes between**  
 3 **November 1, 2014, and January 17, 2015.**  
 4 MS. MORTON: Object to the form.  
 5 Calls for speculation. If you know the  
 6 answer, you can give it.  
 7 THE WITNESS: I -- I don't know,  
 8 because I did not -- I was really not in  
 9 the loop with Sierra Townhomes until I came  
 10 the end of October 2014.  
 11 **Q (By Mr. Butler) I was asking -- maybe I**  
 12 **misspoke the dates. What I was asking is for your**  
 13 **best estimate of the number of break-ins at Sierra**  
 14 **Townhomes between November 1, 2014 and January 17,**  
 15 **2015?**  
 16 MS. MORTON: Same objection. You  
 17 can answer.  
 18 THE WITNESS: The only ones that I'm  
 19 aware of are those four.  
 20 **Q (By Mr. Butler) Okay. Did tenants of**  
 21 **Sierra Townhomes or people who worked at Sierra**  
 22 **Townhomes ever express concern or warned you about**  
 23 **robberies on the property?**  
 24 A No one ever warned me about robberies.  
 25 There was a gentleman who lived in Apartment J-1 who

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1 moved out, who said he was robbed on the property.  
 2 But, you know -- and said that it was by somebody who  
 3 lived on the property, but he would not give us any  
 4 information or cooperate with the police. So I don't  
 5 know the validity of any of it.  
 6 **Q When was that, that the tenant in J-1 said**  
 7 **he'd been robbed on the property?**  
 8 A I don't remember the exact date. It  
 9 happened before I came in October, but he had -- you  
 10 know, he just gave notice to vacate at the end of his  
 11 lease. And he moved out the end of December, and he  
 12 told me that was the reason why. And I tried to get  
 13 some information out of him when he said that it was  
 14 a resident who lived on the property, because I  
 15 didn't want somebody like that on the property, but  
 16 he wouldn't give me any information. And we did get  
 17 a copy of the police report, but he wouldn't tell the  
 18 police anything.  
 19 So I -- you know, I had nothing to go on,  
 20 and there was nothing else I could do.  
 21 **Q Do you know of any other robberies during**  
 22 **the time you were working at Sierra Townhomes?**  
 23 A I don't recall any.  
 24 **Q Did tenants of Sierra Townhomes or people**  
 25 **who worked at Sierra Townhomes ever express concern**

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1 **or warn you about prostitution going on, on the**  
 2 **property?**  
 3 A No. I never heard anything about  
 4 prostitution.  
 5 **Q All right. What about other violent**  
 6 **crimes that I haven't talked about?**  
 7 MS. MORTON: Object to the form.  
 8 Vague. You can answer.  
 9 THE WITNESS: Just the inc -- just  
 10 the information we've already talked about.  
 11 **Q (By Mr. Butler) Okay. Did you or, to the**  
 12 **best of your knowledge, anyone else who worked at**  
 13 **Sierra Townhomes ever get phone calls or receive**  
 14 **voicemails warning about dangerous activity on the**  
 15 **property?**  
 16 A The -- the resident that lived in the I  
 17 building next to the family where the gunfire was  
 18 going off, they would call the office. They left  
 19 some messages. And there might have been one or two  
 20 other messages that we received, but a lot of times,  
 21 they will call and they don't leave their name. They  
 22 just, you know -- it's a voice message we hear, and  
 23 they just want to report that they heard something,  
 24 but we didn't have any names.  
 25 **Q As a result of those voicemails, what**

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1 **additional security measures did Sierra Townhomes**  
 2 **consider?**  
 3 A Well, as I discussed before, during that  
 4 time without having the courtesy officer, we  
 5 contacted the police department while we were looking  
 6 for somebody, asking for their help to step up their  
 7 patrols. And like I said, they did send in unmarked  
 8 cars. A few residents, you know, I would check with  
 9 them, ask them had they seen anything. And some of  
 10 the residents had seen the unmarked cars, officers  
 11 sitting there. And a few time, they would make  
 12 patrols, you know, in plain clothes. You know, they  
 13 did that a few times.  
 14 **Q When the police do the patrol, that**  
 15 **doesn't cost Sierra Townhomes anything, does it?**  
 16 A No --  
 17 MS. MORTON: Objection. Relevance.  
 18 THE WITNESS: No, it doesn't.  
 19 **Q (By Mr. Butler) We talked about crime**  
 20 **grids earlier. I will show you what I'll mark as**  
 21 **Plaintiff's Exhibit K.**  
 22 **(Exhibit K was marked for**  
 23 **identification.)**  
 24 **Q (By Mr. Butler) And I'll represent to you**  
 25 **that this is a crime grid for Sierra Townhomes from**

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<p>1 the time it was bought by AMA Godby to March of 2015,</p> <p>2 which is the time of the -- that we ran that crime</p> <p>3 grid. And I'm not going to go through it line by</p> <p>4 line, but I will ask you this: Would you be</p> <p>5 surprised to learn there are over 600 crimes on that</p> <p>6 crime grid between the time that AMA Godby bought</p> <p>7 Sierra Townhomes in March of 2014?</p> <p>8 MS. MORTON: Object to the form of</p> <p>9 the question.</p> <p>10 THE WITNESS: You're asking if I</p> <p>11 would be surprised?</p> <p>12 <b>Q (By Mr. Butler) Yes.</b></p> <p>13 A No.</p> <p>14 <b>Q All right. I want to go through some</b></p> <p>15 <b>other things with you. All right. We've already</b></p> <p>16 <b>talked about camera signs, I think.</b></p> <p>17 <b>Did you ever, at any point, ask</b></p> <p>18 <b>Mr. Soltani to institute or put in place additional</b></p> <p>19 <b>safety measures or security measures at Sierra</b></p> <p>20 <b>Townhomes?</b></p> <p>21 A No.</p> <p>22 <b>Q Was there ever, to your knowledge, a time</b></p> <p>23 <b>that Mr. Soltani said that he was not going to</b></p> <p>24 <b>institute additional security measures even though</b></p> <p>25 <b>he'd been asked by someone to do so?</b></p>	<p>1 <b>Q Uh-huh.</b></p> <p>2 A And then I do receive, if I -- if I do</p> <p>3 work for any of the extra properties, I receive</p> <p>4 additional pay for that.</p> <p>5 <b>Q Okay.</b></p> <p>6 A And I have -- you know, I have, you know,</p> <p>7 days that I will work, that I won't work. And I have</p> <p>8 specifics that, you know, I won't work over a certain</p> <p>9 amount of hours and different things like that.</p> <p>10 <b>Q Uh-huh. Okay.</b></p> <p>11 A But, you know, I don't know how all the</p> <p>12 accounting works. I know I get one check, but I do,</p> <p>13 you know, multiple things.</p> <p>14 <b>Q There's a lot of that in there that I do</b></p> <p>15 <b>not have to ask you about. I do want to ask this:</b></p> <p>16 <b>Who's the check from that you get?</b></p> <p>17 MS. MORTON: Objection. Relevance.</p> <p>18 You can answer.</p> <p>19 THE WITNESS: The check that I get</p> <p>20 is, most of the time, from Soltani</p> <p>21 Investment Group.</p> <p>22 <b>Q What is -- when it's not from Soltani</b></p> <p>23 <b>Investment Group, who's it from?</b></p> <p>24 MS. MORTON: Same objection. Go</p> <p>25 ahead.</p>
<p>Page 182</p> <p>1 A No. I'm not aware of that.</p> <p>2 <b>Q Was there ever a time, to your knowledge,</b></p> <p>3 <b>that Mr. Soltani considered a security measure, but</b></p> <p>4 <b>declined to do it because it would cost too much</b></p> <p>5 <b>money?</b></p> <p>6 A No.</p> <p>7 <b>Q Who was your em -- or who is your employer</b></p> <p>8 <b>right now, as you sit here today?</b></p> <p>9 A Soltani Investment Group.</p> <p>10 <b>Q All right. And in January of 2015, who</b></p> <p>11 <b>was your employer?</b></p> <p>12 A Soltani Investment Group, I guess. I was</p> <p>13 -- but I was acting as -- two to three days a week,</p> <p>14 as property manager for Sierra Townhomes.</p> <p>15 <b>Q Which is owned by AMA Godby, technically,</b></p> <p>16 <b>right?</b></p> <p>17 A Yeah.</p> <p>18 <b>Q Great. How do you get paid?</b></p> <p>19 MS. MORTON: Objection. Relevance.</p> <p>20 You can answer.</p> <p>21 THE WITNESS: I get paid by check.</p> <p>22 <b>Q (By Mr. Butler) I should be clear.</b></p> <p>23 <b>You get a salary? Is it like an hourly</b></p> <p>24 <b>thing or what?</b></p> <p>25 A I receive what's considered a base pay.</p>	<p>Page 184</p> <p>1 THE WITNESS: It might be from --</p> <p>2 let's see who have I gotten checks from. I</p> <p>3 have gotten checks from Huntington Creek,</p> <p>4 LLC. I have received checks from RMFD</p> <p>5 Management. I have gotten checks from -- I</p> <p>6 haven't gotten one from Nava Holdings. I</p> <p>7 think that's -- I think that's it.</p> <p>8 <b>Q (By Mr. Butler) Okay. Do you receive a</b></p> <p>9 <b>bonus?</b></p> <p>10 A I do.</p> <p>11 <b>Q Okay. Who is that check from?</b></p> <p>12 A That comes from Soltani Investment Group.</p> <p>13 <b>Q All right. In January of 2015, were most</b></p> <p>14 <b>of your checks coming from Soltani Investment Group?</b></p> <p>15 MS. MORTON: Objection. Relevance</p> <p>16 --</p> <p>17 <b>Q (By Mr. Butler) Just like they are today?</b></p> <p>18 MS. MORTON: Objection. Relevance.</p> <p>19 You can answer.</p> <p>20 THE WITNESS: Yes.</p> <p>21 MR. BUTLER: All right. We're about</p> <p>22 to run out of tape, so let's take a break.</p> <p>23 VIDEOGRAPHER: Off the video record.</p> <p>24 The time is 2: 47 p.m.</p> <p>25 (Recess was taken.)</p>

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<p>1 VIDEOGRAPHER: Back on the video 2 record with Videotape No. 4. The time is 3 2:59 p.m. 4 <b>Q (By Mr. Butler) All right. Ms. 5 Richardson, do you have a work credit card?</b> 6 A No, I don't. 7 <b>Q Have you ever for -- while you were 8 working for Mr. Soltani or any of the entities of 9 which he's a member or owns?</b> 10 A No. 11 <b>Q How do you handle expenses?</b> 12 MS. MORTON: Objection. Relevance. 13 You can answer. 14 THE WITNESS: We submit all of our 15 invoices on a biweekly basis, and then 16 checks are cut. 17 <b>Q (By Mr. Butler) Okay.</b> 18 A With an accountant. 19 <b>Q So in January 2015 and today, you handle 20 expenses by submitting expense reports; is that 21 right? Or did you call it something else?</b> 22 A It's -- it's not an expense report. We 23 get invoices from our vendors for materials that we 24 purchase, that we have accounts, we receive invoices. 25 Then we submit those invoices for payment. Starting</p>	<p>1 we would drop them off with Arman or whatever 2 location the checks were going to be cut, wherever 3 the bookkeeper was coming. Or sometimes his father 4 would pick them up. 5 <b>Q How would you know where the bookkeeper 6 was coming?</b> 7 A The bookkeeper comes every two weeks, 8 right before payroll because we do two check runs a 9 month. And it's always during the payroll week. So 10 we have -- all the properties have calendars, and 11 it's got the date, you know, prepare your bills, have 12 them ready. And they're usually picked up between a 13 Wednesday and a Thursday, because checks are usually 14 cut on that Thursday, and, you know, prior to the 15 payroll. And that's when invoices are paid. 16 <b>Q Okay. So what -- whether the work was 17 done on Sierra Townhomes or on Vesta Gardens or on 18 some other apartment complex, you submitted the 19 invoices to the same person?</b> 20 A Yes. 21 <b>Q All right. Did you have a car budget?</b> 22 MS. MORTON: Objection. Relevance. 23 You can answer. 24 THE WITNESS: No. 25 <b>Q (By Mr. Butler) What about the time you</b></p>
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<p>1 October 1st, we went to a new software program where 2 we're able to enter our own invoices into the system 3 instead of submitting all the paper. And then we 4 have an accountant who then goes through, after 5 Mr. Soltani approves what invoices to pay, and checks 6 are cut. 7 <b>Q System changed in October of 2015?</b> 8 A Yes. 9 <b>Q From January 2015 to September of 2015, 10 was the system basically the same?</b> 11 MS. MORTON: Objection. Relevance. 12 You can answer. 13 THE WITNESS: No. We -- we just had 14 to submit all the paper invoices. 15 <b>Q (By Mr. Butler) I mean, the system didn't 16 change substantially during the period -- 17 A Oh. 18 Q -- of January 2015 to September 2015? 19 A Oh, no. No. 20 MS. MORTON: Same objection. 21 <b>Q (By Mr. Butler) All right. No, it did not 22 change? 23 A No, it did not change. 24 Q To whom would you submit the invoices? 25 A We would submit the invoices either to --</b></b></p>	<p>1 <b>spent driving between properties?</b> 2 A Nope. 3 <b>Q It comes out of your pocket?</b> 4 A Yes. 5 <b>Q You ever complain about that?</b> 6 A Yes. 7 <b>Q What was done?</b> 8 A Nothing as of yet. 9 <b>Q Okay. What places would you drive to in 10 your work for Mr. Soltani?</b> 11 MS. MORTON: Objection. Relevance. 12 You can answer. 13 THE WITNESS: Making bank deposits, 14 going to Magistrate Court for dispossessory 15 proceedings. Maybe making a trip to Lowes 16 or Home Depot for a part that somebody 17 needs immediately. That type thing. 18 <b>Q (By Mr. Butler) In addition to the various 19 apartment complexes, I guess? 20 A Yes. 21 Q You go -- you go into Magistrate Court 22 for -- I suppose, for Sierra Townhomes and for Vesta 23 Gardens, right? 24 A Yes. 25 <b>Q And probably for some other apartment</b></b></p>

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<p>1 <b>complexes?</b></p> <p>2 MS. MORTON: Objection. Rel --</p> <p>3 <b>Q (By Mr. Butler) The ones we talked about</b></p> <p>4 <b>earlier; is that right?</b></p> <p>5 A I've --</p> <p>6 MS. MORTON: Objection. Relevance.</p> <p>7 THE WITNESS: Yeah. I've never had</p> <p>8 to go for the others.</p> <p>9 <b>Q (By Mr. Butler) Okay.</b></p> <p>10 A Thank you, Jesus.</p> <p>11 <b>Q Would you go if asked?</b></p> <p>12 A I would.</p> <p>13 <b>Q If you're working at Sierra Townhomes and</b></p> <p>14 <b>you get a call that something needs to be done at</b></p> <p>15 <b>Vesta Gardens, would you go over there and do it?</b></p> <p>16 MS. MORTON: Objection. Relevance.</p> <p>17 You can answer.</p> <p>18 THE WITNESS: If it was something</p> <p>19 that only I could handle. But when I was</p> <p>20 at Sierra Townhomes, it was somebody else</p> <p>21 at Vesta Gardens.</p> <p>22 <b>Q (By Mr. Butler) Uh-huh. Was there ever a</b></p> <p>23 <b>time where you were at Sierra Townhomes and had to</b></p> <p>24 <b>make a trip to Vesta Gardens to handle something?</b></p> <p>25 A Maybe once or twice.</p>	<p>1 <b>Vesta Gardens in January of 2015? Was it just you</b></p> <p>2 <b>and a maintenance person when you were there?</b></p> <p>3 A In 2015.</p> <p>4 <b>Q January 2015.</b></p> <p>5 A Yes.</p> <p>6 <b>Q Who was the maintenance person at Vesta</b></p> <p>7 <b>Gardens in January 2015?</b></p> <p>8 MS. MORTON: Objection. Relevance.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: That's sad. I don't</p> <p>11 remember who was there in January.</p> <p>12 <b>Q (By Mr. Butler) You mentioned a couple of</b></p> <p>13 <b>times a fellow named Pedro. Was he over -- do you</b></p> <p>14 <b>ever see him over at Vesta Gardens?</b></p> <p>15 A He -- he did come to Vesta Gardens. I</p> <p>16 just don't remember if he was there in January.</p> <p>17 <b>Q Okay. Earlier you talked about forms that</b></p> <p>18 <b>-- that you used to do work, probably to send letters</b></p> <p>19 <b>and things like that. Do you remember that?</b></p> <p>20 A Yes.</p> <p>21 <b>Q What kind of forms were they, generally?</b></p> <p>22 A Our lease application, our -- we have ways</p> <p>23 that -- you know, forms that we report. Commissions</p> <p>24 that we report. Our time for payment. We have --</p> <p>25 <b>Q That's enough.</b></p>
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<p>1 <b>Q Okay. And same question in reverse: Was</b></p> <p>2 <b>there ever a time when you were working at Vesta</b></p> <p>3 <b>Gardens and got a call about something needing to be</b></p> <p>4 <b>done at Sierra Townhomes?</b></p> <p>5 A Yes.</p> <p>6 MS. MORTON: Objection. Relevance</p> <p>7 --</p> <p>8 <b>Q (By Mr. Butler) Would you handle it?</b></p> <p>9 A Yes.</p> <p>10 <b>Q Did you ever check the e-mail for Sierra</b></p> <p>11 <b>Townhomes from Vesta Gardens?</b></p> <p>12 A Yes.</p> <p>13 <b>Q Would you ever check the e-mail for Vesta</b></p> <p>14 <b>Gardens from Sierra Townhomes?</b></p> <p>15 A Yes.</p> <p>16 <b>Q You mentioned a maintenance guy at Vesta</b></p> <p>17 <b>Gardens. Who is that?</b></p> <p>18 A Right now, it's Edgar, and if you want me</p> <p>19 to pronounce his last name, I cannot do it. Or --</p> <p>20 Ordidi -- Ordendino or something like that.</p> <p>21 <b>Q Who was it in --</b></p> <p>22 A That was -- I know it was something,</p> <p>23 middle name. I can't pronounce it, but it's Edgar,</p> <p>24 Edgar.</p> <p>25 <b>Q All right. Who was the maintenance in --</b></p>	<p>1 <b>In terms of the forms, including those</b></p> <p>2 <b>like lease applications or time reports or</b></p> <p>3 <b>commissions reports, did you use the same ones at</b></p> <p>4 <b>Sierra Townhomes that you used at Vesta Gardens?</b></p> <p>5 A Yes.</p> <p>6 MS. MORTON: Objection. Relevance.</p> <p>7 <b>Q (By Mr. Butler) Y'all wouldn't have</b></p> <p>8 <b>reinvent the wheel for every apartment complex,</b></p> <p>9 <b>right?</b></p> <p>10 MS. MORTON: Same objection. You</p> <p>11 can answer.</p> <p>12 THE WITNESS: Sometimes forms are</p> <p>13 changed, depending on the property, if</p> <p>14 maybe there's something a little different</p> <p>15 about the property.</p> <p>16 <b>Q (By Mr. Butler) Okay. But it's the same</b></p> <p>17 <b>basic form?</b></p> <p>18 A Yes.</p> <p>19 <b>Q Do you know of anyone who worked on or</b></p> <p>20 <b>around Sep -- Sierra Townhomes, ever being told not</b></p> <p>21 <b>to call the police about crime?</b></p> <p>22 A No. I don't ever recall that.</p> <p>23 <b>Q If the police got called to Sierra</b></p> <p>24 <b>Townhomes, would you usually know about it?</b></p> <p>25 A Not always.</p>



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1 **Q What if they were called on a day that you**  
 2 **were there, would you know about it?**  
 3 A Not always.  
 4 **Q Why not?**  
 5 A If a resident called the police, the  
 6 police would go to their apartment, for whatever  
 7 reason they were calling. A lot of times, it would  
 8 be boyfriend/girlfriend disputes or things like that.  
 9 The police don't come and tell us in the leasing  
 10 office.  
 11 Now, if staff was outside and would say,  
 12 Hey, I see a police car, you know, over at such and  
 13 such apartment, we may inquire a little later, call  
 14 that person, say everything okay. And then they  
 15 would tell us what -- you know, what had transpired.  
 16 But, no, they don't always come in the office. And,  
 17 you know, you're not always outside.  
 18 **Q Isn't the entrance to Sierra Townhomes**  
 19 **right by the leasing office?**  
 20 A Yes. There are two entrances.  
 21 **Q Would the police come in either of them?**  
 22 A Yes.  
 23 **Q How often was it that, say, on a per week**  
 24 **basis, that the police were at Sierra Townhomes --**  
 25 MS. MORTON: Objection. Calls for

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1 speculation.  
 2 **Q (By Mr. Butler) -- on average from**  
 3 **November of 2014 to January 2015?**  
 4 MS. MORTON: Sorry. I thought you  
 5 were done. Now I'll object.  
 6 Calls for speculation. You can  
 7 answer.  
 8 THE WITNESS: You know, I don't  
 9 know. I -- I don't have way of guessing.  
 10 You know, I'm sure, maybe, several times a  
 11 week.  
 12 **Q (By Mr. Butler) Okay. So several times a**  
 13 **week, the police were at Sierra Townhomes?**  
 14 A Yes.  
 15 **Q Nobody who worked at Sie -- at Sierra**  
 16 **Townhomes was present at Sierra Townhomes on Sundays;**  
 17 **is that true?**  
 18 A Correct. We're closed.  
 19 **Q What does AMA Godby own now?**  
 20 A Nothing.  
 21 **Q Have you personally ever called the police**  
 22 **to Sierra Townhomes?**  
 23 A Yes.  
 24 **Q How many times do you think?**  
 25 MS. MORTON: Objection. Calls for

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1 speculation. You can answer.  
 2 THE WITNESS: Top of my head, three  
 3 times that I can remember.  
 4 **Q (By Mr. Butler) What are those three?**  
 5 A I had a resident in the leasing office  
 6 using the WiFi that would not leave so that we could  
 7 lock the office, because he needed to finish a  
 8 report. And I kept asking him to please leave so we  
 9 could go home. He got belligerent, so I called the  
 10 police to have him be removed.  
 11 **Q Okay.**  
 12 A Then I called the police when I saw a  
 13 gentleman who we had given notice of criminal  
 14 trespass to on the property. And they came and we  
 15 had to redo the criminal trespass because it was  
 16 outdated or whatever. And then I called the police  
 17 when a neighbor called about two residents fighting  
 18 and they thought that the woman was being beat up.  
 19 So I called the police to go to her apartment.  
 20 **Q So you recall calling the police to Sierra**  
 21 **Townhomes when someone was using the WiFi and**  
 22 **wouldn't leave the leasing office, when you saw**  
 23 **someone present who had been given a criminal**  
 24 **trespass notice, and when two residents were**  
 25 **fighting. Did I get that right?**

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1 A Yes.  
 2 **Q Do you remember any other times?**  
 3 A That's the only ones that I can remember.  
 4 **Q Who was the person doing the criminal**  
 5 **trespass?**  
 6 A The police officer -- when I called for  
 7 that particular criminal trespass, that particular  
 8 officer, when he came out, he said after six months,  
 9 that we have to do it again, because I had the  
 10 criminal trespass. So we gave him one of our  
 11 trespass forms. He went out and gave him another  
 12 criminal trespass for us.  
 13 **Q Who was the individual who was**  
 14 **trespassing?**  
 15 A His nickname is Al. I forget his real  
 16 name.  
 17 **Q Okay.**  
 18 A His real name is on the criminal trespass,  
 19 but I don't remember his real name.  
 20 **Q Okay. Did y'all take out a criminal**  
 21 **trespass on Antonio Payne?**  
 22 A I am not aware of a criminal trespass,  
 23 other than the verbal criminal trespass.  
 24 **Q Who gave that verbal criminal trespass?**  
 25 **What individual?**

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1 A Mr. Soltani said that he gave him the  
 2 verbal criminal trespass.  
 3 **Q Is that the only giving of a criminal**  
 4 **trespass warning to Antonio Payne that you're aware**  
 5 **of?**  
 6 A That is all I'm aware of that I could  
 7 find. I couldn't find the hard copy.  
 8 **Q All right. So the only giving of a**  
 9 **criminal trespass warning to Antonio Payne, that**  
 10 **you're aware of, is the one given by Soltani; is that**  
 11 **true?**  
 12 A Yes.  
 13 **Q All right. And we've already discussed**  
 14 **that today, I think.**  
 15 A Yes.  
 16 **Q To your knowledge, has Soltani ever called**  
 17 **the police to Sierra Townhomes?**  
 18 A Yes.  
 19 **Q How many times that you know of?**  
 20 A I have no idea how many times, but I know  
 21 he has called.  
 22 **Q Do you know any police officers by name?**  
 23 A No.  
 24 MS. MORTON: Other than the one we  
 25 talked about earlier today?

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1 MR. BUTLER: Yes. We talked about  
 2 the captain, but the record will have that.  
 3 THE WITNESS: Yeah, that's -- that's  
 4 the captain.  
 5 **Q (By Mr. Butler) What is the procedure that**  
 6 **Sierra Townhomes follows for banning someone from the**  
 7 **apartment complex?**  
 8 A In order for us to be able to enforce the  
 9 criminal trespass, we have to give them the written  
 10 notice. We try to get them to sign it. It's more  
 11 helpful if they sign it, but 95 percent of the time,  
 12 they do not cooperate and sign it. Then, once we get  
 13 that, we have to wait until they're back on the  
 14 property again. Then we have to contact Fulton  
 15 County. The response time takes so long that they  
 16 usually leave the property and we can't catch them.  
 17 And we just have to keep being diligent when we see  
 18 them in hoping that Fulton County gets there in  
 19 enough time to, you know, issue the arrest.  
 20 **Q This is a process that Sierra Townhomes**  
 21 **documents, I presume?**  
 22 A Yes.  
 23 **Q And the first step is to give a written**  
 24 **warning to the person being banned. Did I get that**  
 25 **right?**

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1 A Right. You can give a verbal, and then  
 2 you can con -- but usually the verbal needs to either  
 3 be in the presence of a police officer or some type  
 4 of law enforcement, usually, for them to arrest. If  
 5 you've given a verbal warning when they -- you know,  
 6 you can call and say, okay, we've given this person  
 7 notice of criminal trespass, but usually they're  
 8 going to come. They will escort them off the  
 9 property, they're going to arrest them, and then they  
 10 will do the written one for us.  
 11 **Q All right. You said earlier that you had**  
 12 **a property where celebrities stayed.**  
 13 A Yes.  
 14 **Q Who stayed there?**  
 15 A Elton John.  
 16 **Q What was the name of the property?**  
 17 MS. MORTON: Objection. Relevance.  
 18 You can answer.  
 19 THE WITNESS: It was the Park Lane  
 20 on Peachtree.  
 21 **Q (By Mr. Butler) All right. Is that like**  
 22 **two towers?**  
 23 A I don't know what it -- I don't go  
 24 downtown that often. I think it's changed names and  
 25 -- and I had Andrew Jones when he was a Braves

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1 player.  
 2 **Q Okay. Is there a gate at that apartment**  
 3 **complex?**  
 4 A No.  
 5 **Q Is there a security guard?**  
 6 A Well, it's a highrise, so you have to come  
 7 in through the front door, through the lobby.  
 8 **Q Okay. Are there cameras?**  
 9 MS. MORTON: Objection. Relevance.  
 10 THE WITNESS: Yes.  
 11 **Q (By Mr. Butler) Are there lights that keep**  
 12 **the place lit up at night?**  
 13 A Yes.  
 14 **Q Have you worked at many apartment**  
 15 **complexes that had those security measures during**  
 16 **your 37 years as a property manager?**  
 17 A Yes. I've had properties that have had  
 18 controlled access gates, that have had 24-hour  
 19 security. I've had every spectrum of property with  
 20 different security measures.  
 21 **Q You said 24-hour security personnel, I**  
 22 **guess, --**  
 23 A Yes.  
 24 **Q -- is what you were saying. Okay.**  
 25 **Are controlled access gates useful for**

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1 **detering crime?**  
 2 A I've not --  
 3 MS. MORTON: Objection. Lack of  
 4 foundation. Go ahead.  
 5 THE WITNESS: I've not found that it  
 6 changes -- any difference.  
 7 **Q (By Mr. Butler) Are 24-hour security**  
 8 **personnel on the complex any good for deterring**  
 9 **crime?**  
 10 MS. MORTON: Same objection. You  
 11 can answer.  
 12 THE WITNESS: I've not seen -- I  
 13 mean, the cases that I have dealt with, I  
 14 mean, the same type of incidents still  
 15 occurred, because you've got somebody  
 16 patrolling. They can be in one side of the  
 17 property and something happen in another  
 18 end, or you miss something or just human  
 19 error. But I've not seen where it's made a  
 20 huge difference.  
 21 **Q (By Mr. Butler) Does it make any**  
 22 **difference?**  
 23 MS. MORTON: Same objection. You  
 24 can answer.  
 25 THE WITNESS: It may make some

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1 difference.  
 2 **Q (By Mr. Butler) So the 24-hour security**  
 3 **personnel may make some difference with respect to**  
 4 **detering crime; is that true in your opinion?**  
 5 A Sure.  
 6 **Q Are you aware of any time where**  
 7 **Mr. Soltani did not want to pay for light bulbs to**  
 8 **fix broken lights?**  
 9 A No.  
 10 **Q From the perspective of the safety of**  
 11 **tenants and their guests, what are some of the**  
 12 **primary risks at an apartment complex like Sierra**  
 13 **Townhomes?**  
 14 MS. MORTON: Objection. Vague.  
 15 THE WITNESS: There are risks  
 16 everywhere. I don't care where you live,  
 17 there are risks. So I -- I don't really  
 18 know what you mean by what risk.  
 19 **Q (By Mr. Butler) Well crime poses a risk to**  
 20 **tenants and their guests, doesn't it?**  
 21 A Yes.  
 22 **Q And you recognize that at Sierra**  
 23 **Townhomes, right?**  
 24 A Yes.  
 25 **Q And that's something that Sierra Townhomes**

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1 **is supposed to address as the property owner, right?**  
 2 MS. MORTON: Object to the form of  
 3 the question.  
 4 THE WITNESS: Yes.  
 5 **Q (By Mr. Butler) All right. I wanted to**  
 6 **ask you a little bit about searching for a courtesy**  
 7 **officer in late 2014, going into January 2015.**  
 8 A Okay.  
 9 **Q Who put up the Craig's List ads?**  
 10 A Arman. He put these up.  
 11 **Q Did you put up any Craig's List ads?**  
 12 A I might have put one in.  
 13 **Q Who would have repaid you for the cost of**  
 14 **the Craig's List ad that you put in?**  
 15 A The company.  
 16 **Q Which company?**  
 17 A Well my checks come from Soltani  
 18 Investment Group, but --  
 19 **Q So that company, presumably?**  
 20 A Yes. But, you know, monies internally  
 21 could have been transferred to that account from the  
 22 other property. I don't know how they do all of that  
 23 stuff.  
 24 **Q Money gets transferred around and**  
 25 **sometimes it's hard to figure out exactly why; is**

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1 **that fair?**  
 2 MS. MORTON: He's not asking you to  
 3 guess.  
 4 THE WITNESS: Well, I mean, it's --  
 5 it's just common practice in this industry.  
 6 **Q (By Mr. Butler) For the money to be**  
 7 **transferred around in ways that are hard to tell or**  
 8 **predict?**  
 9 A No. For payroll expenses. If you work  
 10 for multiple properties, you will get one check from  
 11 one entity. And then the other entity reimburse the  
 12 entity that paid you the check.  
 13 **Q Okay. Is that something -- have you ever**  
 14 **worked in the accounting side of AMA Godby or Soltani**  
 15 **Investment Group?**  
 16 A I've not worked in the accounting side.  
 17 From time to time, I have helped when the bookkeeper  
 18 was, you know, on vacation.  
 19 **Q Have you ever worked with the accountant**  
 20 **in arranging the numbers, or is that something that's**  
 21 **outside of your personal knowledge --**  
 22 MS. MORTON: Object to the form.  
 23 And relevance.  
 24 THE WITNESS: I put in the account  
 25 codes to make sure that, you know, all the

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<p>1 expense codes and the income codes are 2 correct.</p> <p>3 <b>Q (By Mr. Butler) In terms of when one 4 Soltani entity, such as AMA Godby or Soltani 5 Investment Group, reimburses another, is that 6 something that you're familiar with from an 7 accounting perspective, or is that something that's 8 outside of your personal knowledge?</b></p> <p>9 A I don't -- I guess you'd say it's outside 10 of my personal knowledge. I don't know how they do 11 all of that, but any of my expenses, there are times, 12 I do spend some of my personal money for certain 13 items, if it's not at a large sum of money. And then 14 I submit the receipt.</p> <p>15 <b>Q Okay. Aside from you being repaid for 16 your personal money, are the accounting practices of 17 the various Soltani entities, insofar as they 18 reimburse each other, something that is beyond your 19 personal knowledge?</b></p> <p>20 A Yes.</p> <p>21 <b>Q How many Craig's List ads were posted from 22 October 2014 to January 2015?</b></p> <p>23 A I think, maybe, three.</p> <p>24 <b>Q Okay.</b></p> <p>25 A Maybe there were more. I don't remember.</p>	<p>1 with the phone calls. We contact everyone that we 2 received their resume. And then we kind of weed, you 3 know, weed out from there.</p> <p>4 <b>Q Have you met -- or is it -- Ani Soltani?</b></p> <p>5 A Ali.</p> <p>6 <b>Q Ali, is that Arman's father?</b></p> <p>7 A Yes.</p> <p>8 <b>Q Okay. It's Ali.</b></p> <p>9 A Ali.</p> <p>10 <b>Q Excuse me. How many times have you met 11 Ali Soltani?</b></p> <p>12 A Hundreds of times.</p> <p>13 <b>Q How often did he come to Sierra Townhomes 14 while you were working there, during the periods you 15 were working there?</b></p> <p>16 A He comes into town once a month for like a 17 week. Sometimes longer.</p> <p>18 <b>Q That's during the period of mid 2014 to 19 January 2015, once a month or so?</b></p> <p>20 A That's from the time of 2006 on. Yes.</p> <p>21 <b>Q Okay. From 2006 to today, --</b></p> <p>22 A Uh-huh.</p> <p>23 <b>Q -- he's come in town to Atlanta --</b></p> <p>24 A At least once a month.</p> <p>25 <b>Q -- at least once a month. Talking about</b></p>
<p style="text-align: right;">Page 206</p> <p>1 <b>Q Did you ever post ads at universities or 2 colleges or anything like that?</b></p> <p>3 A There was a flier that I took to -- what 4 was it? Morehouse and Spelman. I took it to their 5 little police precinct thing to see if we could, you 6 know, get a campus police officer interested.</p> <p>7 <b>Q Did you ever have an officer come to see 8 Sierra Townhomes and follow them around as he did a 9 patrol, sort of like a dry run?</b></p> <p>10 A We have -- we do -- we do an orientation. 11 And they have to come and, you know, we -- and, of 12 course, we get them acclimated to the property. And 13 then they're shown all the checkpoints for the 14 system, you know, where they -- where they have to go 15 and where their patrol markers are.</p> <p>16 <b>Q How many interviews, by phone or in 17 person, would you say that you did for a courtesy 18 officer between October of 2014 and May -- strike 19 that.</b></p> <p>20 <b>How many interviews, whether over the 21 phone or in person, would you say that you conducted 22 of potential courtesy officers between October 2014 23 and January 2015?</b></p> <p>24 A Oh, gosh. I know, probably, between 30, 25 35 phone calls, because that's how we start off, is</p>	<p style="text-align: right;">Page 208</p> <p>1 <b>Ali Soltani, right?</b></p> <p>2 A Yes.</p> <p>3 <b>Q How often would he visit Sierra Townhomes?</b></p> <p>4 A His office was upstairs on the third 5 floor.</p> <p>6 <b>Q Did he come there just about every time he 7 was in town?</b></p> <p>8 A Yes.</p> <p>9 <b>Q For multiple days per visit?</b></p> <p>10 A Yes.</p> <p>11 <b>Q What are his responsibilities with regard 12 to managing the properties owned by the Soltani 13 entities?</b></p> <p>14 MS. MORTON: Object to the form. 15 Calls for speculation. You can answer if 16 you know.</p> <p>17 THE WITNESS: To my -- I mean, he 18 never had his hands in the supervision of 19 employees. You know, usually when he would 20 come, until we obtained a bookkeeper, he 21 was the one who would, you know, cut the 22 checks. He was helpful in, you know, 23 making sure -- when he came into town, he 24 would make sure all the offices were 25 stocked with office supplies. He was the</p>

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1 one who would go and take care of all of  
 2 that. You know, check with each property,  
 3 see what we needed and, you know, made sure  
 4 that we had what he needed.  
 5 **Q (By Mr. Butler) Did Ali Soltani work on**  
 6 **properties other than Sierra Townhomes?**  
 7 MS. MORTON: Objection. Relevance.  
 8 **Q (By Mr. Butler) To the best of your**  
 9 **knowledge.**  
 10 A I don't know what you mean by "work."  
 11 Other than just checking to see that -- what, you  
 12 know, materials they need, up until the sale of the  
 13 property, his office was upstairs at Sierra; that's  
 14 where he would be at least three days out of his  
 15 visit. And, you know, he would be the one paying all  
 16 the bills for all the properties from that location.  
 17 **Q Did he keep abreast of what was going on**  
 18 **at Sierra Townhomes?**  
 19 MS. MORTON: Objection. Calls for  
 20 speculation. You can answer.  
 21 THE WITNESS: I don't know. His  
 22 English is not really good. So if there  
 23 were conversations about the business, that  
 24 would have been between he and Arman.  
 25 **Q (By Mr. Butler) Did you ever talk with Ali**

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1 **Soltani about the business?**  
 2 A No.  
 3 **Q Why did Armstrong, the courtesy officer,**  
 4 **not start until February 9 of 2015?**  
 5 A He was supposed to move in January, and I  
 6 think he -- I'm just trying to do this by memory. He  
 7 was working a -- another job at the same time, and  
 8 there was like a conflict. He wanted to give them  
 9 proper notice, so he -- and it had something to do  
 10 with him being able to move because his daughter was  
 11 in school; he didn't want to disrupt certain things.  
 12 He had to wait 'till he could get all of that  
 13 scheduled. So it got pushed back a week or two.  
 14 **Q Who pushed it back?**  
 15 A Mr. Armstrong.  
 16 MR. BUTLER: Let's take a break.  
 17 I'll have a few more after this, but it's  
 18 not going to be many.  
 19 VIDEOGRAPHER: Off the video record.  
 20 The time is 3:27 p.m.  
 21 (Recess was taken.)  
 22 VIDEOGRAPHER: Back on the video  
 23 record. The time is 3:29 p.m.  
 24 **Q (By Mr. Butler) You mentioned at the**  
 25 **outset, Ms. -- Ms. Richardson, that you've given**

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1 **deposition in a personal injury case involving Vesta**  
 2 **Gardens, I believe.**  
 3 A Yes.  
 4 **Q What was that about?**  
 5 MS. MORTON: Objection. Relevance.  
 6 You can answer.  
 7 THE WITNESS: There was a -- a small  
 8 portion of a -- a piece of drywall that  
 9 fell in a dining room. Resident said she  
 10 was injured and, you know, brought suit.  
 11 **Q (By Mr. Butler) Who was the defense lawyer**  
 12 **in that case, the lawyer representing whatever**  
 13 **Soltani company was involved; do you remember?**  
 14 A I don't remember his name.  
 15 **Q All right. Was it someone at Ms. Morton's**  
 16 **office; do you know?**  
 17 A No. No.  
 18 **Q I want to ask -- I wanted to ask you if**  
 19 **you're aware of an incident here. Are you aware of a**  
 20 **homicide that occurred on Sierra Townhomes in April**  
 21 **of 2014, involving a fellow named Malcolm Scott?**  
 22 A If that is -- well, yes, that's the --  
 23 that's that college -- that college kid. He was not  
 24 a resident of Sierra Townhomes. He was -- they were  
 25 coming back from -- what is that festival they have

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1 during the spring? They were walking down Godby  
 2 Road. The gentleman he was with, his friends that he  
 3 was with, one of them lived at Sierra Townhomes, but  
 4 they were approached while they were on Godby Road.  
 5 And, I guess, it was an attempted robbery. And then  
 6 they ran onto the property, trying to hide behind the  
 7 mailboxes to get cover. And they were shot.  
 8 **Q They were heading to Sierra Townhomes**  
 9 **where one of them lived, right?**  
 10 A Right.  
 11 **Q And Mr. Malcolm Scott was shot and killed,**  
 12 **right?**  
 13 A Yes.  
 14 MR. BUTLER: No further questions.  
 15 MS. MORTON: Then we're done.  
 16 VIDEOGRAPHER: The time is now 3:32  
 17 p.m. This concludes Videotape No. 4.  
 18 Off the record.  
 19 (Whereupon proceedings concluded at  
 20 3:32 p.m.)  
 21 (It was stipulated and agreed by and  
 22 between counsel for the respective parties  
 23 and the witness that the signature of the  
 24 witness to the deposition be reserved.)  
 25

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DISCLOSURE

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia which states: "Each court reporter shall tender a disclosure form at the time of the taking of the deposition stating the arrangements made for the reporting services of the certified court reporter, by the certified court reporter, the court reporter's employer or the referral source for the deposition, with any party to the litigation, counsel to the parties, or other entity. Such form shall be attached to the deposition transcript," I make the following disclosure:

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~~Lamarra George, CCR-2582~~  
November 4th, 2015.

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CERTIFICATE

STATE OF GEORGIA:  
COUNTY OF FULTON:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 1 through 213 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This, the 11th day of November 2015.

~~Lamarra George, CCR-2582~~  
My commission expires on the 1st of April 2016.

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DEPOSITION OF TONYA RICHARDSON/LG

I do hereby certify that I have read all questions propounded to me and all answers given by me on the 4th day of November 2015, taken before Lamarra George, and that:

1) There are no changes noted.  
2) The following changes are noted:

Pursuant to Rule 30(e) of the Federal Rules of Civil Procedure and/or the Official Code of Georgia Annotated 9-11-30(e), both of which read in part: Any changes in form or substance which you desire to make shall be entered upon the deposition...with a statement of the reasons given...for making them. Accordingly, to assist you in effecting corrections, please use the form below:

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DEPOSITION OF TONYA RICHARDSON/LG

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If supplemental or additional pages are necessary, please furnish same in typewriting annexed to this deposition.

TONYA RICHARDSON

Sworn to and subscribed before me, this the    day of    , 20    .

Notary Public  
My commission expires:

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