

In the Matter Of:

DAN DECOMBES vs. METRO PUBLIC SAFETY GROUP, LLC, et al.

VIDEOTAPED DEPOSITION

STEVE TURNER

April 20, 2016



100 Mayfair Royal
181 Fourteenth Street
Atlanta, GA 30309
404.847.0999

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IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA

DAN DECOMBES,
Plaintiff,

CIVIL ACTION NO.

vs.

15A56502-6

METRO PUBLIC SAFETY GROUP,
LLC, and DEXTER WASHINGTON,
Defendants.

VIDEOTAPED DEPOSITION OF
STEVE TURNER
April 20, 2016
10:00 a.m.

Butler Tobin
21 Lee Street
Suite 250
Jonesboro, GA 30236

Thomas R. Carey, CCR-B-1715



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23 Also present: Videographer Reese Hamilton

24

25

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1 MR. BUTLER: This will be the deposition

2 of Mr. Steven Turner taken pursuant to Notice and

3 agreement of counsel, taken pursuant to the Georgia

4 Civil Practice Act for all purposes permitted by the

5 Act including use at trial. I marked as Exhibit A a

6 copy of the Notice of Deposition. I'm start a stack

7 there, I guess. Let's go on the video.

8 (Document marked for identification as

9 Plaintiff's Exhibit A.)

10 MR. ELLIS: Before we go on video, are we

11 going to reserve all objections except as to form

12 and responsiveness of the answer?

13 MR. BUTLER: No, let's take it pursuant to

14 the Civil Practice Act.

15 MR. ELLIS: Civil Practice Act allows you

16 to reserve objections.

17 MR. BUTLER: Well, if you think that's

18 what it says, then that's good. We'll take it

19 pursuant to the CPA.

20 MR. ELLIS: All right, cool.

21 MR. BUTLER: I don't necessarily disagree.

22 MR. ELLIS: Well, I mean, amongst Counsel

23 we can agree, I assume, Mr. Turner is going to be at

24 trial, if this thing goes to trial. So deposition's

25 first use is only for impeachment.

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1 DESCRIPTION OF EXHIBITS

2

3 PLAINTIFF'S

4 EXHIBIT IDENTIFICATION

5 A Depo Notice 4

6 6 Thumb Drive 13

7 7 Washington Certificate 9

8 8 EPSTA Screen Shot 9

9 9 Instructor Turner's Shirt 14

10 10 EPSTA Security Firearms

11 Course Document Compilation 18

12

13 DEFENDANT'S

14 EXHIBITS

15 1 Georgia Code 17-4-60 44

16

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18 INDEX TO EXAMINATION

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20 Examination By-Mr.Ellis 32

21 Further Examination By-Mr.Butler 50

22 Further Examination By-Mr.Ellis 58

23

24

25

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1 MR. BUTLER: No, this is for all purposes

2 permitted by the Civil Practice Act including use at

3 trial, so we may play it.

4 MR. ELLIS: In lieu of testimony?

5 MR. BUTLER: Yeah, we may. We may not.

6 VIDEOGRAPHER: This is the videotape

7 deposition of Steve Turner taken in the matter of

8 Dan Decombes versus Metro Public Safety Group and

9 Dexter Washington. Today's date is April 20, 2016.

10 The time is now 10:01 a.m. My name is Reese

11 Hamilton, I'm the Videographer. Tom Carey is the

12 Court Reporter. Counsel, please introduce

13 yourselves for the record and the witness will be

14 sworn.

15 MR. BUTLER: Jeb Butler on behalf of the

16 plaintiff.

17 MR. ELLIS: Willie Ellis on behalf of

18 Metro Public Safety Group, LLC and Dexter

19 Washington.

20 STEVEN TURNER

21 having been duly sworn, was examined and testified

22 as follows:

23 EXAMINATION

24 BY-MR.BUTLER:

25 Q Please state your full name for the



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1 record.
2 A Steven Turner.
3 Q Do you live in Henry County?
4 A No.
5 Q Where do you live?
6 A It's clayton County.
7 Q Did you used to live in Henry County?
8 A No. It's the, the land maps have it
9 weird, but it's always Clayton.
10 Q Okay. Do you work in Henry Country? Is
11 that where your office is?
12 A My office is in Henry County, yes.
13 Q Tell us what you do for a living, please.
14 A Currently I'm an instructor of Officers,
15 and also run a full time security agency.
16 Q All right. Is the business that you use
17 to instruct Officers called Elite Public Safety
18 Training Academy?
19 A Not any longer.
20 Q All right. Did it used to be?
21 A Yes.
22 Q Was it called Elite Public Safety Training
23 Academy when you trained Dexter Washington?
24 A Yes, sir.
25 Q What kind of things did you teach at Elite

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1 Public Safety Training Academy, or EPSTA?
2 A Everything that a Certified Officer for
3 their, everything they carry on their belt, taser,
4 batons, OC, firearms. Any tool that is on an
5 Officer's belt, I'm certified to instruct them.
6 Q Did you train people that would become
7 security guards, among others things?
8 A Yes, sir.
9 Q Now, Mr. Turner, as you know this case
10 involves a company called Metro Public Safety Group,
11 sometimes called Metro Security. Do you know that
12 company?
13 A Yes, sir.
14 Q You used to work for them, right?
15 A Yes.
16 Q How long did you work for them?
17 A Total on and off, and still do things for
18 them, it's been about 12 years.
19 Q And you trained some of their guards, I
20 think; is that right?
21 A Correct.
22 Q I mean, not just one, but you've trained a
23 few folks that went to work or already worked at
24 Metro Security; is that right?
25 A Yes.

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1 Q This case as you know involves a fellow
2 named Dexter Washington. My understanding is that
3 Metro Security hired you to train Dexter Washington;
4 is that right?
5 MR. ELLIS: Objection, form.
6 MR. BUTLER: You can go ahead and answer.
7 THE WITNESS: Yes.
8 Q (By Mr. Butler) Now, you've got
9 competitors as a trainer of security guards,
10 correct?
11 A Yes.
12 Q But Metro Security chose you to train
13 Dexter Washington?
14 MR. ELLIS: Objection. Metro Security did
15 not train, I mean, choose Mr. Turner.
16 Q (By Mr. Butler) You trained Dexter
17 Washington, right?
18 A That's correct.
19 Q Is it your understanding that Metro
20 Security chose you to do the training?
21 MR. ELLIS: Same objection.
22 THE WITNESS: Yeah, I mean, I don't know.
23 That would be me assuming.
24 Q (By Mr. Butler) Anyway, he was trained by
25 you and then went to work for Metro Security; is

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1 that right?
2 A Yes.
3 MR. BUTLER: I'm going to show you a
4 Certificate that Metro Security produced in this
5 case. I'll mark it as Plaintiff's Exhibit 7.
6 (Document marked for identification as
7 Plaintiff's Exhibit 7.)
8 Q (By Mr. Butler) Tell us what that is,
9 please.
10 A That is the firearms portion of the
11 Certificate. The firearm portion of the training
12 Certificate.
13 Q This, Plaintiff's Exhibit 7 is what shows
14 that you trained Dexter Washington, right?
15 A That's correct.
16 Q I'd like to discuss some of your
17 qualifications as an instructor at EPSTA and
18 wherever else. I'll start this by showing you a
19 page off of the website that you had when you were
20 running EPSTA. And I've marked it as Plaintiff's
21 Exhibit 8.
22 (Document marked for identification as
23 Plaintiff's Exhibit 8.)
24 Q (By Mr. Butler) Is that the page of your
25 qualifications from the EPSTA website?

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1 A Yes. That's a bio, yes.
2 Q A bio of you?
3 A Uh-huh.
4 Q I'd like to go through it with you. It
5 says here in the text portion of the page that when
6 you were a teenager you monitored the aisles of the
7 Kroger grocery store on Cascade Road which was the
8 toughest neighborhood in Atlanta at that time; is
9 that right?
10 A Yes.
11 Q It says you enjoyed the feeling of
12 apprehending shoplifters, but it wasn't enough; is
13 that right?
14 A Yes.
15 Q In the second paragraph here we learned
16 that you went to U.S. Army Infantry School and
17 graduated from it. You were an infantry foot
18 soldier specializing in long guns and small arms.
19 A Yes.
20 Q And then you went on to become a security
21 officer; is that right?
22 A Yes.
23 Q And then the last sentence of that second
24 paragraph tells us that, doing all that work and
25 some other stuff you were able to build your

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1 knowledge of Georgia law and build the experience
2 that only the hard core streets, the properties that
3 you patrolled could provide; is that right?
4 A Yes.
5 Q You went to the Police Academy and
6 graduated in 2003; is that right?
7 A Yes.
8 Q There it says you were able to show your
9 FTO. Doesn't it say that in the very end of the
10 third sentence in the third paragraph?
11 A Yes, I was able to show FTO.
12 Q What is FTO?
13 A Field Training Officer.
14 Q Okay. The next paragraph talks about
15 getting your instructional certification where you
16 performed EPSTA, and says you taught over 2,000
17 students; is that right?
18 A Yes.
19 Q And then it goes on to talk about a whole
20 bunch of accreditations and certifications that you
21 have?
22 A Correct.
23 Q The next paragraph says, among other
24 things, that you always quickly moved up to
25 supervisory positions in the ranks where you worked.

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1 And then at some point went to the Clayton County
2 Sheriff's office where you became, you worked in the
3 Aviation Unit; is that right?
4 A Yes.
5 Q The last paragraph talks about work with
6 celebrities and corporate figures; is that correct?
7 A Yes.
8 Q I wanted to ask you some questions about
9 the pictures on here. There is a picture of you in
10 front of the helicopter on the top left, do you see
11 that?
12 A Yes.
13 Q Is that when you were working with the
14 Clayton County Sheriff's office?
15 A Yes.
16 Q Under that there is a picture of you with
17 some glasses and a shotgun. Where is that taken?
18 A That is at the NRA Shotgun and Handgun
19 Instructor Course. Law Enforcement Instructor and
20 Shotgun Instructor course.
21 Q You've also got some videos for EPSTA that
22 have been on your website and are up on YouTube; is
23 that right?
24 A Yes.
25 MR. BUTLER: All right. Let's go off

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1 video while I get that set up.
2 VIDEOGRAPHER: Going off video record at
3 10:09 a.m.
4 (Off-the-record discussion)
5 VIDEOGRAPHER: Back on the video record at
6 10:11 a.m.
7 (Document marked for identification as
8 Plaintiff's Exhibit 6.)
9 Q (By Mr. Butler) Mr. Turner, I will show
10 you now a video from a thumb drive that I've marked
11 as Plaintiff's Exhibit Number 6, and I will ask you
12 whether this is the video for EPSTA that used to be
13 on the website and is up on You Tube.
14 (Playing the video.)
15 Q (By Mr. Butler) That concludes the video.
16 Was that the video for EPSTA?
17 A No, not the video, it's one of my videos
18 on You Tube, yes, sir.
19 Q One of your videos.
20 A Yes.
21 Q Early on the video there was somebody with
22 a handgun shooting into a target. Was that you?
23 A One of the people, yes.
24 Q And then at the end there was somebody
25 talking about a T-shirt, I assume that was you?



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1 A Yes.

2 Q I want to ask you some questions about
3 that T shirt. Well, first, let me ask you this.
4 That video is publicly available on the internet?

5 A It's on You Tube, yes.

6 Q I want to ask you questions about that
7 T-shirt. I've got here a screen shot --

8 A I would say as far as I know now it's
9 still on You Tube. Some of the videos have been
10 removed.

11 Q Anyway, at the time you trained Dexter
12 Washington it was publicly available?

13 A I assume that's how you got it, but I
14 can't answer that honestly.

15 (Document marked for identification as
16 Plaintiff's Exhibit 9.)

17 Q (By Mr. Butler) Okay. I'm going to show
18 you now a screen shot from that video that I marked
19 as Plaintiff's Exhibit 8.

20 A It's on the same numbers.

21 Q I'm sorry, let me remark it then. I'll
22 restart the question. Thank you for catching me.
23 I'm going to show you a screen shot from
24 the video we just watched, and it's marked
25 Plaintiff's Exhibit Number 9. This is you in a

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1 T-shirt, right?

2 A That's correct.

3 MR. ELLIS: I'm just going to object to
4 this screen shot because the lettering on the
5 T-shirt is not all visible.

6 Q (By Mr. Butler) It says, "Protect, top
7 off, scan, escape and dial 911"; is that right?

8 A Yes, from what I can see. Yes.

9 MR. ELLIS: Same objection.

10 Q (By Mr. Butler) What does protect mean in
11 this context?

12 A Protect yourself. Don't just survive.
13 Most survivors bow down, get hit, take the hits and
14 don't fight back. Protect in my objective is for
15 you to fight back.

16 Q What does "top off" mean?

17 A Top off is make sure that if you are in a
18 fight that you always stay prepared for anything
19 else that may happen. Based on my knowledge,
20 training and experience of watching multiple crimes
21 that have occurred, criminals don't travel in packs
22 of one, they travel in packs of multiple.

23 Q Does top off mean make sure you've got
24 plenty of ammunition in your firearm?

25 A Not plenty, just enough just in case you

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1 have to fire more than what you expected. Most
2 self-defense guns carry only eight rounds. From
3 statistics in shootings we know that a golden number
4 is between seven and ten bullets fired.

5 Q So it refers to keeping ammunition in your
6 gun?

7 A Keeping --

8 MR. ELLIS: Objection. Objection. He's
9 already asked and answered the question.

10 MR. BUTLER: Standing objection to you on
11 this one on the same basis.

12 Q (By Mr. Butler) It means keeping
13 ammunition in your in gun; is that right?

14 MR. ELLIS: I'm just going to have a
15 standing objection.

16 THE WITNESS: No, it means replenishing
17 your gun.

18 Q (By Mr. Butler) With ammunition?

19 A Once it has been shot.

20 Q What does "scan" mean?

21 A Scan means don't become, don't go into
22 tunnel vision. Just always focus on what is going
23 on right in front of you. The guy that's robbing
24 you could have been a decoy. So therefore he might
25 have had somebody waiting out in the car. I mean,

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1 this is geared towards the person that is living an
2 everyday life, walking into a gas station, you walk
3 in and unsuspectingly you see a robbery going down.
4 You know somebody is outside in the car waiting, or
5 possibly outside in the car waiting, or possibly
6 just outside waiting on somebody. So don't just
7 think that by fighting this guy or stopping a crime,
8 that that's it. Make sure you scan and make sure
9 nothing else is available.

10 Q Next it says, "escape." What does that
11 mean?

12 A That means that you don't know the
13 territory. Just like I said about scanning. If you
14 see something happening, or you assume something to
15 be happening, it's always good to assume that in a
16 deadly force encounter, especially a robbery or
17 something like that, that other things are going to
18 happen.

19 Most likely that person may be familiar
20 with their, the area that they are in, which is why
21 they chose to rob you in that area. And therefore
22 you never have the upper hand in that area. So you
23 need to escape and then dial 911. Don't try to stay
24 there and stay focused on what's going on or you can
25 be the person that ultimately succumbs to something



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1 that you weren't expecting.
2 Q Escape means to get away from the problem,
3 is that fair?
4 A To get away from the possibilities.
5 Q "Dial 911." I suppose that's
6 self-explanatory, but tell me why it's on the
7 T-shirt.
8 A Because that's a necessary part of any
9 self-defense situation. If you don't dial 911, you
10 can ultimately end up becoming a suspect and not
11 just a victim.
12 Q Dialing 911 brings in the police who are
13 trained to deal with stuff like that; is that right?
14 A You also could be trained. I don't
15 understand that comment.
16 Q Well, dial 911 would bring in the police
17 force?
18 A It would bring in the police, correct.
19 Q All right. I brought with me today some
20 of your training materials that were produced to me
21 by Metro Security in this case and marked them as
22 Plaintiff's Exhibit 10.
23 (Document marked for identification as
24 Plaintiff's Exhibit 10.)
25 Q (By Mr. Butler) The stuff in Plaintiff's

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1 Exhibit 10, is that the training materials that
2 EPSTA used to train folks on firearms?
3 A That's impossible to tell. I haven't
4 flipped through the whole thing, but this is my
5 cover of my Power Point on firearms training course,
6 yes.
7 Q Okay. Flip through it and see if it looks
8 right.
9 A So everything I laid eyes on appears to be
10 what I put in there, yes.
11 Q All right. Thank you. Turn with me,
12 please, to the -- well, let me ask you this first.
13 This would be, if the document is what I'm telling
14 you it is, this would be what you used to train
15 Dexter Washington, right?
16 A Firearms portion only, yes.
17 Q So he would have received this Power Point
18 or this document for the firearms portion of his
19 training?
20 A Correct, the second part of the training.
21 MR. ELLIS: Objection.
22 Q (By Mr. Butler) All right. Go to the
23 first tabbed page, please. It says there -- now,
24 this page says, on the bottom right has a stamp,
25 00141, and highlighted there it says, "Know your

Page 20

1 law. Ignorance is no excuse." Tell us what that
2 means, please.
3 A I think it's self-explanatory, but the
4 Georgia law OCGA 1-3-6 says that ignorance of the
5 law will be accepted as no excuse. Meaning that you
6 have to know the law if you're going to apply it.
7 Q When you carry gun as a security officer,
8 you're supposed to know what the law is, right?
9 A Yes.
10 Q And then under that it says, "Treat others
11 how you would want your family treated if they were
12 put in the exact same situation."
13 That's kind of like the Golden Rule, isn't
14 it?
15 A For me, for morality reasons, yes, but
16 not -- I mean, Golden Rule for who? I mean, you're
17 asking Golden Rule. Like that is a good moral thing
18 to live by, yes.
19 Q That, let's see, you said it's a morality
20 thing. Tell me what you meant by that.
21 A Which part -- are you asking me about the
22 treat others or --
23 Q Yeah, the treat others. The second --
24 A Yeah, that's a morality thing. It's a
25 model. It's a model that I teach to all my students

Page 21

1 because that's just the way I've always been in law
2 enforcement and public safety. I've had three
3 people thank me for being the one that arrested them
4 because of the way I treated them. You know.
5 Weirdest statement in the world, but they thanked me
6 that I treated them with respect. I teach this to
7 all my students.
8 Q Let's go to the next tabbed page. The
9 stamp on the bottom right of this one is 00143. And
10 the highlighted part at the bottom says,
11 "Self-defense is not a game. It is the absolute
12 last resort when all else fails and harm cannot be
13 avoided." Did I read that right?
14 A Yes.
15 Q That means that you ought not use violence
16 if there is some alternative; is that right?
17 A That's incorrect.
18 Q That's incorrect?
19 A That's incorrect.
20 Q Tell me what it means that self-defense is
21 not a game, it's the last resort.
22 A Repeat your part again so I can respond to
23 that.
24 Q Well, I don't want to put words in your
25 mouth. Just tell me what it means to you.



Page 22

1 A What this means is, you should always
2 treat self-defense as a last resort. What a last
3 resort to you is and what a last resort to me is is
4 two totally different things. I try to tell all my
5 students to avoid everything, if possible. Because
6 it leads to these things right here, depositions and
7 possible criminal proceedings. And what, we're
8 trying to avoid all that at all possible unless you
9 absolutely have to. Because if something happens
10 it's going to put you in a situation where you're
11 going to have to do these type things.

12 Q And along those lines, there in the bottom
13 I put a red box around your word, which is already
14 in red. Says, quote, If at all possible, avoid,
15 evade, escape and fight if you must. End quote. Is
16 that right?

17 A Yes.

18 Q Let's go to the next tabbed page. This
19 one is labeled, "Safety Rules"; is that right?

20 A That's correct.

21 Q And then at the bottom it says, 00150.
22 The highlighted part here that says, "Do not point
23 your muzzle at anything you do not intend to
24 destroy." Did I read that right?

25 A Yes.

Page 23

1 Q That's because guns are dangerous, right?

2 A No.

3 Q Guns are not dangerous?

4 A No.

5 Q All right. Well, tell me why you instruct
6 your students not to point the muzzle at anything
7 they do not intend to destroy?

8 A Because humans are prone to accidents.
9 And if you do not have something that is legally
10 able to be shot in front of your muzzle, you
11 shouldn't be pointing at it because the nature of
12 accident causes destruction most of the time. And
13 in this case pointing your muzzle at anything you're
14 not intending to destroy, you have a sympathetic
15 response. And if the gun goes off, and it was not
16 pointing in a legal righteous direction, you're
17 going to have some problems.

18 Q Muzzle, in the context of this sentence,
19 means the business end of a firearm, right?

20 A Yes.

21 MR. ELLIS: Objection, form.

22 Q (By Mr. Butler) Let's go to the next
23 tabbed page. This page talks about safety as well,
24 doesn't it?

25 A Yes, sir.

Page 24

1 Q And the number on the bottom, 00156, for
2 the record. The part I've highlighted at the very
3 top, says, quote, Think of this as the area beyond
4 your target. End quote.

5 Did I read that right?

6 A Yes.

7 Q A rule I learned to hunt growing up was,
8 know your target and what is beyond it. Is that a
9 similar idea to what is expressed on this page?

10 A Yes, sir.

11 Q The point is, you might miss what you're
12 shooting at and hit something behind it, right?

13 A That's not why we say it. Well, it's not
14 about might missing, it's just being aware of what
15 you are shooting at. Because there are things that
16 could be behind your target. We're definitely not
17 looking at it as I might miss. That's never a
18 thought process.

19 Q Well, you want to be safe with regard to
20 what is behind your target, right?

21 A That's correct. You want to be safe,
22 correct.

23 Q Let's go to the next tabbed page. This
24 page, which is marked 00191 in the bottom right is
25 about the ammunition that you suggest to your

Page 25

1 students, right?

2 A Yes, sir.

3 Q It looks like you recommend jacketed
4 hollow point bullets, is that true?

5 A Yes. Well, it's not -- just hollow
6 points. When I say jacketed, not all of these are
7 jacketed hollow points.

8 Q Just hollow points then?

9 A Correct.

10 Q Okay. Tell me what a hollow point bullet
11 is designed to do when it hits it's target.

12 A It's designed to stay inside the target.
13 It's designed to lose energy once inside and it made
14 impact. Therefore, it helps with over-penetration.
15 So you are basically making for a safer self-defense
16 scenario for others around you.

17 Q The hollow point bullet is designed to
18 expand when it hits it's target, right?

19 A That's correct.

20 Q And with regard to the target, a hollow
21 point bullet is usually going to do more damage than
22 a full metal jacket bullet?

23 MR. ELLIS: Objection.

24 THE WITNESS: That's not correct.

25 MR. BUTLER: That's not correct?

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1 THE WITNESS: That's not correct.
2 Q (By Mr. Butler) Well, let's go to the next
3 tabbed page. This one, which says 00193 in the
4 bottom is labeled ammunition penetration, right?
5 A Yes.
6 Q And then I see on the left side of the
7 page there is a list of various calibers and bullet
8 weights, and then they all say JHP, right?
9 A That's correct.
10 Q What is JHP?
11 A Jacketed hollow points.
12 Q Tell us what we're looking at here on the
13 right side of the page in front of the, sort of
14 yellow background?
15 A This is, the diagram just demonstrates of
16 why people make arguments over caliber and the
17 differences between caliber. This diagram shows
18 that there is no, there is not a significant
19 difference in the choice between a nine and a 45.
20 And by looking at the wound channels, the wound
21 cavity that you see, there is not enough of a naked
22 eye to say, okay, that was far more superior than
23 the other.
24 Q You mentioned the term, "wound cavity."
25 A Yes, sir.

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1 Q Tell me what that means, please.
2 A Actually, scientifically I don't know, but
3 realistic terms or real terms, wound cavity is
4 something that is created when a bullet passes
5 through any type of material, but we're talking
6 about human material. That's the cavity that it's
7 supposed to create, that it might create, or will
8 create, or just depends on each different person's
9 body makeup. Because every person is going to be
10 different, which is why the question that you asked
11 me earlier about the devastation of a hollow point,
12 that's not, that's never, that's impossible to tell.
13 They still have arguments on it a hundred years
14 later about what a bullet can do to a human because
15 every human is going to be different. So it's a
16 cavity that is created, that's supposed to leave a
17 wound channel, which creates a person, supposed to
18 create a person to stop.
19 Q Supposed to stop the person it hits?
20 A That's what it has been described as. I'm
21 not a scientist, so based on my training and
22 knowledge, that's what it has been described as.
23 Q Well, in this picture here, we're looking
24 I think at what the bullets do when they hit a
25 target, right, or that's what it's supposed to show?

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1 A This is a ballistic video, not -- every
2 ballistic gel is timed differently.
3 Q Ballistic gel is the target. That's what
4 the bullet should hit, right?
5 A Correct.
6 Q What we see here, the bullets are coming
7 from left to right on this page, right?
8 A Correct.
9 Q And what we see here is that when the
10 bullet hits the ballistic gelatin, it expands and
11 then creates this enlarged wound channel?
12 A This is --
13 MR. ELLIS: I object because I don't see
14 anything on this page that talks about expansion or
15 what is going on here.
16 THE WITNESS: That wouldn't be necessarily
17 true anyway.
18 Q (By Mr. Butler) All right. Well, tell
19 me -- now, this red in the yellow is what marks the
20 wound channel, right?
21 A That is a part of the wound channel. The
22 wound channel is the entire piece of, until the
23 bullet stops.
24 Q And we can see here that the bullets are
25 going from left to right. I think we already said

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1 that, right?
2 A That's correct.
3 Q And we can see that once the bullet
4 strikes the front of this yellow, the wound channel
5 expands, right, becomes wider?
6 MR. ELLIS: Same objection. There is no
7 orientation to the picture --
8 MR. BUTLER: I'm going to ask you to stop
9 these speaking objections.
10 MR. ELLIS: Do you want --
11 MR. BUTLER: I can reserve to form.
12 MR. ELLIS: Do you want to reserve to
13 form?
14 MR. BUTLER: I want you to state your
15 objection and --
16 MR. ELLIS: I am doing it.
17 MR. BUTLER: Well, go.
18 MR. ELLIS: I object to this particular
19 diagram and you extrapolating from it something that
20 is not here.
21 MR. BUTLER: I don't understand what that
22 objection is. I don't think I've seen that in the
23 Code. If you want to object to, Calls for
24 speculation, misstates evidence, something like
25 that, you can do it. But these speaking objections

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1 have got to stop.
2 MR. ELLIS: Did you understand that you
3 were calling for speculation, then you understood my
4 objection. Please move on.
5 MR. BUTLER: If you want to make an
6 objection to speculation, the proper way to do it
7 is, Objection, calls for speculation. You know
8 that. You've been doing this longer than I have.
9 These speaking objections got no place in this
10 deposition or anywhere else.
11 MR. ELLIS: Did you understand my
12 objection? Please --
13 MR. BUTLER: I will proceed with the
14 question --
15 MR. ELLIS: Please do no call for
16 speculation of the witness intentionally, please,
17 Jeb.
18 MR. BUTLER: I'm going to ignore that
19 comment, and I'm going to ask the question again.
20 I'm going to give you a standing objection on the
21 same basis to the question I'm about to ask. So you
22 don't have to do another speaking objection.
23 MR. ELLIS: And I've asked that we can do
24 that for all these, this entire deposition and you
25 refused.

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1 Q (By Mr. Butler) As the bullet -- Mr.
2 Turner, we can see here as the bullet enters the
3 left side of the page the wound channel expands
4 beyond just the diameter of the bullet, right?
5 MR. ELLIS: Same objection. Calls for
6 speculation.
7 THE WITNESS: Yeah, I mean, the picture
8 is, from my transparency, is definitely not a full
9 picture of the entrance of the bullet.
10 Q (By Mr. Butler) We can see the expansion
11 of the jacketed hollow point bullet, though, here,
12 right?
13 MR. ELLIS: Same objection.
14 THE WITNESS: The expansion of the bullet
15 itself is only on the right far end.
16 Q (By Mr. Butler) And on the left we can see
17 the expansion of what you called the wound channel?
18 A Of the channel only.
19 MR. ELLIS: Same objection.
20 MR. BUTLER: So that's right as to the
21 channel?
22 MR. ELLIS: No, there is no expansion.
23 THE WITNESS: No. That's -- right.
24 That's not something, right, that I would
25 scientifically be able to testify to. No, I mean, I

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1 couldn't testify to that.
2 Q (By Mr. Butler) Isn't it true that on the
3 left side of this page, what you refer to as the
4 wound channel, is larger than the diameter of the
5 bullet?
6 A That's correct.
7 Q Let's go to the last tabbed page. The
8 title of this one, which is labeled 00196 on the
9 bottom right is, "Operational Safety of Your
10 Firearm"; is that right?
11 A Yes. I lost you for a second. Yes.
12 Q And then the highlighted language here
13 says, quote, Your firearm is to always be aimed at
14 the immediate threat or in a holster. That's it.
15 It's the law. Did I read that correctly?
16 A Yes.
17 Q Is that what you teach your students?
18 A Yes.
19 MR. BUTLER: Thank you. No further
20 questions at this time.
21 EXAMINATION
22 BY-MR. ELLIS:
23 Q Mr. Turner, my name is Willie Ellis. I'm
24 an attorney here for Metro Security and Dexter
25 Washington. We've met before; is that correct?

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1 A Yes.
2 Q Okay. Have you met with Mr. Butler before
3 today?
4 A Yes.
5 Q How many times did you meet with him?
6 A Once.
7 Q How long did that meeting happen?
8 A I would say approximately 30, 45 minutes.
9 Maybe an hour.
10 Q You were at this office?
11 A No, he came and met me at the gym. At one
12 of my gyms.
13 Q Okay. Did he tell you before you met with
14 him that you were an adverse witness?
15 A Explain adverse.
16 Q Well, you look at what has been marked
17 Exhibit 8 to your deposition, Notice of Deposition.
18 MR. BUTLER: I don't believe he has a
19 copy, but I'll give him one.
20 THE WITNESS: Yeah, I don't have that one.
21 Q (By Mr. Ellis) If you read the Notice of
22 Deposition, it says, "The deposition will be taken
23 for all purposes of examination and all other
24 purposes permitted by the Georgia Civil Practice
25 Act, including use at trial, upon cross-examination

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1 because the witness is identified with the adverse
2 party."
3 Did he tell that you that he identified
4 you as being an adverse witness?
5 A No, I've never heard that term used.
6 Q Are you a witness for Metro Security?
7 A No.
8 Q Have you been hired as a witness for Metro
9 Security?
10 A No.
11 Q Did you work for Metro Security at the
12 time you trained Dexter Washington?
13 A No. Not worked for them, no.
14 Q Did you work for them at any time during
15 this incident?
16 A No. Just as the training instructor.
17 That's it.
18 Q So you were hired as, your company was
19 hired to perform training for Dexter Washington?
20 A Yes, as a third-party vendor, yes.
21 Q Did you have any understanding that Dexter
22 Washington could not go to another person for
23 training?
24 A No, I only received the call of
25 availability to do the training, and I did the

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1 training.
2 Q Is Metro Security the only company you
3 provided training for?
4 A No, sir.
5 Q Can you just, I don't know if you can, but
6 for purposes of this deposition can you just provide
7 some of the companies you provide training for?
8 A I wouldn't want that to go on the record,
9 but --
10 MR. BUTLER: Hold on a minute. This is
11 going on the record right now if you say it. I
12 don't know how important this is to you. Mr. Turner
13 said he doesn't want it put on the record, who else
14 he trains.
15 THE WITNESS: I got just the names of the
16 company.
17 MR. ELLIS: I'm talking about the names of
18 the companies, not the people.
19 THE WITNESS: I understand.
20 MR. ELLIS: You don't want the names of
21 the companies on the record?
22 THE WITNESS: I wouldn't, but it's not a
23 big deal.
24 MR. BUTLER: You might just ask how many.
25 Q (By Mr. Ellis) Well, first of all, have

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1 you trained other security officers for other
2 security companies?
3 A Yes, sir.
4 Q About how many security companies have you
5 provided training for the officers?
6 A A lot. Actually a lot. So many, exact
7 number would be unclear, but it's definitely over
8 30.
9 Q And you were shown a video during this
10 deposition. You were only shown one video; is that
11 correct?
12 A Yes.
13 Q Is that a video you show to security
14 officers for training?
15 A No.
16 Q The videos you show for security officers
17 for training, do they teach the principles inside
18 this Power Point that's been listed as an Exhibit to
19 your deposition?
20 A Say that one more time.
21 Q The videos that you show for training to
22 security officers, do they teach the principles that
23 you shown in this Power Point that has been marked
24 as Exhibit P-10 to your deposition?
25 A Yes, sir, some do and others are purposes

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1 of what not to do. Not all of them are based on
2 saying, This is the right training, thing to do. We
3 also show the bad and we explain that.
4 Q Okay. In this case the plaintiff's
5 counsel, who is sitting next to you, ever show you
6 the video of what happened on the night, I believe
7 it was May 10th, for the incident we're here about
8 with Dexter Washington?
9 A Yes.
10 Q Did he ever show you videos about that?
11 A Yes, the video was shown.
12 Q He didn't show those videos to you just
13 now when he did your deposition, did he?
14 A No.
15 Q Do you know why?
16 A No.
17 Q Okay. When you saw the video of the
18 incident, did plaintiff's counsel show you a video
19 of when his client Mr. Decombes hit Mr. Washington?
20 A I believe he did.
21 Q Okay. Based on that video, what did you
22 extrapolate from what you saw?
23 A A forcible felony had occurred.
24 Q What do you mean by that?
25 A State law, what a forcible felony is, had



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1 occurred at the time he struck, Dexter Washington
2 was struck by the vehicle.
3 MR. BUTLER: I'm going to object to the
4 extent it calls for a legal expert, or a legal
5 expert opinion.
6 MR. ELLIS: That's fine.
7 Q (By Mr. Ellis) I'm just asking what did
8 you see? So are you saying that you saw, based on
9 what you saw that you saw Mr. Decombes' vehicle come
10 in contact with Mr. Washington?
11 A What's the question?
12 Q All right. You saw a video?
13 A Yes.
14 Q Of the parking lot and the plaintiff's
15 vehicle come in contact with Mr. Washington?
16 A Yes.
17 Q Is that what you're saying?
18 A Yes.
19 Q Okay. And you're saying based on that you
20 believe that something was done wrong?
21 MR. BUTLER: Objection. Leading.
22 THE WITNESS: I asked the question the
23 first time. I believe that based on my reading of
24 the law it was a forcible felony that occurred,
25 which would be aggravated assault.

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1 Q (By Mr. Ellis) What is your understanding
2 of aggravated assault?
3 A Aggravated assault is using a weapon to
4 cause injury or harm to another.
5 MR. BUTLER: Same objection.
6 Q (By Mr. Ellis) Do you know whether injury
7 or harm is required for aggravated assault to
8 happen?
9 A No, sir.
10 MR. BUTLER: Same objection.
11 THE WITNESS: Because firing a weapon at
12 somebody could also be considered aggravated assault
13 and never hit them.
14 Q (By Mr. Ellis) And in fact, you put that
15 in your training material; is that correct?
16 A Which part?
17 Q What constitutes an aggravated assault?
18 A Forcible felony, yes, but we don't break
19 down the exact law, like aggravated assault, murder,
20 anything like that. But we definitely talk about
21 forcible felony.
22 Q Okay. Did you see the, any other videos
23 regarding this incident when plaintiff's counsel
24 showed it to you?
25 A The one from the parking lot and the one

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1 from the street.
2 Q Okay. And what did you see in the video
3 from the street?
4 A Dexter following the vehicle out to the
5 street. I believe from the left side of the
6 footage, I can't really tell where it was from. I
7 believe from the left side of the road looking down
8 kind of behind the car toward Dexter Washington and
9 the vehicle, and the vehicle passing Dexter and --
10 obviously from the video, we talked about shots
11 fired, but you can't, like from what I recall you
12 cannot see shots being fired from the vehicle. You
13 just know it because of the story.
14 Q Okay. Does a security officer in your
15 opinion have the ability to stop the ingress or
16 egress of people to a property he's hired to
17 protect?
18 MR. BUTLER: Objection, calls for
19 speculation and relevance.
20 MR. ELLIS: You can answer.
21 THE WITNESS: So I always tell my security
22 officers, especially in training, that we don't get
23 into anything. Rule is one thing, law is another.
24 So if you are there to do a job, do it to the best
25 of your ability where your policy does not overrule

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1 law. So we definitely, I definitely feel that if
2 your rules do not supersede law, then it would be
3 okay. Yes, I mean, my opinion is that stopping
4 somebody from doing something, it's a rule and it
5 does not violate the law, then it would be okay.
6 Yes.
7 Q In this case are you familiar, are you
8 aware of -- well, actually, strike that.
9 What does it appear in the video where Mr.
10 Washington was in the parking lot that he was doing?
11 A From the start, onset of the video that
12 I've seen, because obviously I don't know what
13 happened before that 30 minutes, the hour before
14 that. But from the onset of what I've seen in the
15 videos that I've watched, you see, I guess the
16 plaintiff going to his car. I guess pull out of his
17 parking space, come out and I see Dexter Washington
18 with what appears a lighted object. Maybe a cell
19 phone, I'm not sure. But it's a lighted object in
20 his hand, waving, basically waving the car. Of
21 course I can't assume that he's telling him to stop.
22 He was definitely waving like this before he was
23 struck with the vehicle.
24 MR. BUTLER: I'm going to object on the
25 grounds of the best evidence rule. And also I don't



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1 see the point of having Mr. Turner describe videos
2 from memory when the videos are themselves
3 available.
4 MR. ELLIS: Well, if he said he didn't
5 recall, I would have given him the video. But he
6 seemed to recall the videos you showed him. And so
7 I'm asking what does he recall.
8 MR. BUTLER: I'm not going to argue with
9 you.
10 MR. ELLIS: That's fine.
11 Q (By Mr. Ellis) Do you need to see the
12 video, Mr. Turner, to --
13 A It depends on the question.
14 Q Well, do you need to see the video to see
15 whether or not what you just testified to was
16 accurate?
17 A Not about that part, no.
18 Q Okay. Did it appear to you that Mr.
19 Washington was working at the time in the video?
20 A I can only say he was there.
21 Q Okay. That's fine. Could you tell in the
22 video whether or not the driver of the vehicle
23 stopped his car or tried to avoid hitting Mr.
24 Washington?
25 A From what I can remember he did not. From

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1 what I saw on the video he did not stop into the
2 roadway. It was a continuing motion.
3 Q Could you tell from the video whether
4 there was anything that was obstructing the driver's
5 view of Mr. Washington?
6 A Not -- I couldn't tell that by the video,
7 no.
8 Q Based on the video did there appear to
9 anything obstructing the view of Mr. Washington?
10 A I couldn't tell by the video.
11 MR. BUTLER: Objection. Calls for
12 speculation. Best evidence.
13 Q (By Mr. Ellis) Once of plaintiff hit Mr.
14 Washington, struck him, did he have a right to make
15 a citizen's arrest?
16 A Yes.
17 MR. BUTLER: Legal objection.
18 Q (By Mr. Ellis) What do you base that on?
19 A OCGA 17-4-60.
20 MR. BUTLER: Make that same law expert
21 objection.
22 MR. ELLIS: That's fine.
23 Q (By Mr. Ellis) What does 17-4-60 provide?
24 A It provides that if a crime is committed
25 in your presence or your immediate knowledge you may

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1 arrest the offender. If the offense is a felony and
2 the offender is escaping, or attempting to escape,
3 you may arrest him upon reasonable and probable
4 grounds of suspicion.
5 MR. BUTLER: Same objection. I'll stop
6 doing that if you give me a standing objection that
7 it calls for a legal conclusion and legal expert.
8 MR. ELLIS: I'm fine. You can continue to
9 make your objections.
10 MR. BUTLER: Okay.
11 MR. ELLIS: I think the jury should hear
12 your objections.
13 MR. BUTLER: Normally they get cut from
14 the video. I suppose we will see.
15 MR. ELLIS: We will see. And I'm going to
16 put in the record what is -- I don't have an exhibit
17 sticker. So I can just say Defendant 1. We'll put
18 the exhibit sticker on later.
19 (Document marked for identification as
20 Defendant's Exhibit 1.)
21 MR. BUTLER: Do you have an additional
22 copy of that?
23 MR. ELLIS: I do.
24 MR. BUTLER: Thank you.
25 Q (By Mr. Ellis) Mr. Turner, this is a Code

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1 section from the Georgia Code of law. What Code
2 section is that referring you to?
3 A 17-4-60.
4 Q And I believe you've already said what
5 your understanding is of a citizen's arrest. Is
6 this the law you were just referring to on camera?
7 A Yes.
8 MR. BUTLER: Same objection.
9 Q (By Mr. Ellis) Could you just read what
10 that says to the jury?
11 A It says, "A private person may arrest an
12 offender if the offense is committed in his presence
13 or within his immediate knowledge. If the offense
14 is a felony and the offender is escaping or
15 attempting to escape, a private person may arrest
16 him upon reasonable and probable grounds of
17 suspicion."
18 Q Now, Mr. Turner, you have that same
19 statute in what has been marked as Exhibit P-10 to
20 your deposition; is that correct?
21 A Which one is that?
22 Q That is your Power Point presentation.
23 A That is -- it's in my unarmed Power Point
24 presentation. I'm not sure that it's in my firearm
25 presentation.

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1 Q Okay. But that is a Statute that you
2 teach to your security officers; that's correct?
3 A Yes, sir, because they can't get the armed
4 portion without first having the unarmed. They
5 cannot get the armed portion of the training until
6 they have had the unarmed portion of the training.
7 They can't become armed without first having unarmed
8 training.
9 Q You said earlier something about forcible
10 felony, does that have to do with the use of a
11 deadly weapon or --
12 A It's considered one of the possible
13 crimes.
14 MR. BUTLER: Same objection.
15 THE WITNESS: If it involves the use of a
16 weapon.
17 Q (By Mr. Ellis) Do you think a car can be
18 used as a weapon?
19 A In my opinion, yes.
20 MR. ELLIS: Same objection.
21 Q (By Mr. Ellis) Do you think a car, if used
22 as a weapon, can be deadly?
23 A Yes, if used as a weapon.
24 Q And when -- I know this is kind of a silly
25 question. When I say if used as a weapon it can be

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1 deadly, how can a car be deadly?
2 A I don't mean to sound facetious, but I
3 guess we can ask the 20 people that just recently
4 got killed in California when they got run over by a
5 car at a wedding.
6 Q I asked you before whether or not when you
7 met with plaintiff's counsel did he ever identify
8 himself as, as you as being an adverse witness
9 before you agreed to meet with him?
10 A Not me being an adverse witness. He
11 advised who he was. I never heard that term before,
12 so I didn't --
13 Q Did he advise you that he would attempt to
14 discredit your credibility?
15 A No, sir.
16 MR. BUTLER: Objection to that. That
17 hasn't happened. In fact, I've built up this
18 witness' credibility. That misstates what's already
19 in evidence.
20 Q (By Mr. Ellis) This particular photograph
21 here that was put in evidence as Exhibit P-8 that
22 the plaintiff put in.
23 A Yes, sir.
24 Q Do you teach this sequence of events to
25 security officers?

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1 A That is going to be Exhibit 9.
2 Q I have it as P-8, is it P-9?
3 A It was changed.
4 Q Okay. Is that something you teach to
5 security officers?
6 A No, sir.
7 Q Okay. So this particular photograph is
8 completely out of context when it comes to how you
9 train a security officer; is that correct?
10 A That's correct.
11 MR. BUTLER: Objection, vague, misstates
12 evidence.
13 Q (By Mr. Ellis) Is this what you train
14 security officers to do?
15 A No, sir.
16 Q Did you train Mr. Washington to do this?
17 A No, sir.
18 Q So why is this photograph relevant to your
19 training of Mr. Washington?
20 A I don't know, sir.
21 Q It's not, is it?
22 A It's not how I train security officers.
23 Q Thank you. This exhibit that has been
24 marked here, this photo, excuse me, photo of your
25 bio, did you train Mr. Washington with shotguns?

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1 A No, sir, not that I'm aware of.
2 Q Did you train Mr. Washington on
3 helicopters?
4 A No, sir.
5 Q Okay. So any questions about what these
6 pictures depict, as far as your training Mr.
7 Washington, are they relevant to this case?
8 MR. BUTLER: Objection.
9 THE WITNESS: I don't know.
10 MR. BUTLER: That's a totally improper
11 question. That's for the Judge to decide.
12 MR. ELLIS: Well, it's actually for -- I
13 can still ask Mr. Turner whether or not he, I mean,
14 whether these pictures pertain to the training he
15 gave Mr. Washington.
16 MR. BUTLER: You can ask that. I agree.
17 THE WITNESS: No, it would not pertain to
18 it as far as -- Mr. Washington purchased a shotgun.
19 As far as I recall, he was not trained with
20 shotguns. I don't believe I ever trained any Metro
21 officer on a shotgun.
22 MR. ELLIS: Okay. I have no further
23 questions.
24 MR. BUTLER: All right. Give me a minute.
25 I'll have some follow-up. But it won't last long.

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1 VIDEOGRAPHER: Going off video record at
2 10:52 a.m.
3 (Brief recess.)
4 VIDEOGRAPHER: Back on the video record at
5 10:55 a.m.
6 FURTHER EXAMINATION
7 BY-MR. BUTLER:
8 Q Mr. Turner, you were asked a bunch of
9 questions about having met with me. Do you remember
10 those questions?
11 A Yes, sir.
12 Q Now, if I came and met with you at the gym
13 where you were working, I think; is that right?
14 A No, waiting on the kids.
15 Q Waiting on your kids. Over in McDonough?
16 A Yes, sir.
17 Q That was back in January, does that sound
18 right?
19 A I don't remember.
20 Q Okay.
21 A I don't remember dates.
22 Q Anyway, if the defense lawyer had come and
23 met with you, would you have met with him just like
24 you met with me?
25 A Yes, sir. I met with both parties.

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1 Q In fact, you did talk with the defense
2 lawyer, right?
3 A Yes, sir.
4 Q What did y'all talk about?
5 A About what happened in the case and what I
6 thought about it.
7 Q Same stuff we're here talking about today?
8 A Yes, sir.
9 Q And when I met with you I told you who I
10 represented, right?
11 A Yes, sir.
12 Q And I told you that the case was against
13 Metro Security, right?
14 A Yes, sir.
15 Q Now, you mentioned earlier that you --
16 when the defense lawyer was asking you questions, he
17 was talking about before you trained Dexter
18 Washington, you said you got the call to ask about
19 availability or something like that?
20 A Yes, sir.
21 Q Do I remember that right?
22 A Yes.
23 Q Now, who did you get the call from?
24 A Normally comes from Leslie there. I don't
25 know if she's considered -- I want to say she's a

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1 secretary. She handles all the in-house items.
2 Q For who?
3 A Metro Security as far as I know.
4 Q So you got the call from Metro Security to
5 train Dexter Washington?
6 A Correct.
7 Q And you've trained multiple people for
8 Metro Security, right?
9 A Yes, sir.
10 Q If the President of the company has said
11 that you trained, I forget his exact words, at least
12 trained a lot of people who worked for Metro
13 Security, would you have any reason to disagree with
14 that?
15 A No, sir.
16 MR. ELLIS: I'm going to just object to
17 asking him to --
18 MR. BUTLER: Asking him about another
19 witness' testimony.
20 MR. ELLIS: Exactly.
21 Q (By Mr. Butler) All right. Now, your
22 website, and the videos that were on it, those were
23 available for Metro Security to look at just like
24 anybody else in the world, right?
25 MR. ELLIS: Objection.

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1 THE WITNESS: They're available.
2 MR. ELLIS: Calls for speculation.
3 THE WITNESS: It's a website that is
4 public viewing.
5 Q (By Mr. Butler) Available for anybody?
6 A Available for anybody.
7 Q You were asked about the T-shirt that
8 said, "Call 911," do you recall those questions?
9 A Yes.
10 Q Do you teach your students not to call
11 911?
12 A Specifically that has been one of the
13 things that we teach anybody to do because that's a
14 necessary part of law. So we teach law-based. So,
15 yeah, we teach 911. 911 is the legal part of what
16 you need to do after an incident has happened.
17 Q You teach your folks to call 911?
18 A Yes, sir.
19 Q You were asked about deadly weapons. Is a
20 hand gun a deadly weapon?
21 A No, sir.
22 Q A hand gun is not a deadly weapon?
23 A Not in the context you're saying. A gun
24 by itself, no. A gun in somebody's hand, depending
25 on who it is, can be.



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1 Q If someone has a gun in their hand and
2 they are shooting it, is the gun a deadly weapon?
3 A No.
4 Q A gun -- all right. So let's say somebody
5 takes a gun and points it at me and shoots it. Is
6 that gun then a deadly weapon?
7 A That depends on the context. It could be
8 a self-defense weapon or if it's a person with
9 ill-will, it could be a deadly weapon, yes.
10 Q If you get shot, there is a good chance
11 you are going to end up dead; is that right?
12 MR. ELLIS: Objection. Calls for
13 speculation.
14 THE WITNESS: I don't know.
15 Q (By Mr. Butler) I'm going to ask you that
16 one more time. If you get shot, there is a good
17 chance you could end up dead; is that right?
18 A No, sir.
19 MR. ELLIS: Same objection.
20 Q (By Mr. Butler) There's not a chance that
21 if you get shot you could end up dead?
22 A There is a chance, yes.
23 Q And you could be dead because you got
24 shot, right?
25 A Yes, sir.

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1 Q The defense lawyer asked you about video
2 from the parking lot. Do you remember those
3 questions?
4 A Yes, sir.
5 Q I want to show you another video that I
6 believe has already been marked as Plaintiff's
7 Exhibit 2. It's very short. I think it was marked
8 in a previous deposition. Now that I run off the
9 mouth too much let me repeat the question so you're
10 sure. I'm going to show you another video, Mr.
11 Turner, that I believe has already been marked as
12 Plaintiff's Exhibit 2. Anyway, it's a video of the
13 shooting by Dexter Washington.
14 MR. ELLIS: Objection.
15 MR. BUTLER: And I will play it for you
16 now.
17 (Playing video.)
18 MR. ELLIS: I would just object to that
19 video. The video does not show the whole course of
20 the incident that led to the shooting. It was
21 selected and skipped to a select portion of the
22 video.
23 MR. BUTLER: Mr. Turner, if defense
24 counsel won't, has a longer version of it and they
25 want to play it, that will be fine. Or if they want

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1 to play it for the jury, that will be fine too.
2 MR. ELLIS: We will. But we don't have it
3 here for this deposition, and he's already seen the
4 longer version. But you can answer the question if
5 you would like to, Mr. Turner.
6 MR. BUTLER: Let me ask the question
7 again. I haven't even asked a question.
8 THE WITNESS: I was going to say, I didn't
9 hear a question.
10 Q (By Mr. Butler) All right. I will play
11 the video one more time. It's going to be the same
12 video. Then I will ask you a couple of questions
13 about it.
14 A Okay.
15 (Playing video.)
16 Q Now, I know you weren't there on the
17 scene. Is it your understanding that at the
18 beginning of that clip, Dexter Washington, who is
19 the man in the street, was firing toward the car?
20 MR. ELLIS: Objection.
21 THE WITNESS: Again, I can't -- like I
22 said before, there is no way to tell if something is
23 being fired. I do see his arms go up.
24 Q (By Mr. Butler) Well, if I were to tell
25 you that Dexter Washington at that point is firing,

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1 would you have any reason to disagree with that?
2 MR. ELLIS: Objection.
3 THE WITNESS: That would be your
4 testimony, not mine.
5 Q (By Mr. Butler) Would you have any reason
6 to disagree with what I'm saying?
7 MR. ELLIS: Assumes facts not in evidence.
8 MR. BUTLER: Is the defense's position
9 that Dexter Washington didn't shoot his pistol?
10 MR. ELLIS: I'm not -- my position is that
11 Mr. Turner doesn't know where it occurred and if it
12 occurred, and you're trying it put in.
13 MR. BUTLER: This is crazy talk. Crazy
14 talk.
15 MR. ELLIS: It is not crazy talk.
16 Q (By Mr. Butler) I will ask you this
17 question, Mr. Turner. I know that you weren't there
18 and don't know what happened other than what you've
19 seen on the video.
20 A Correct.
21 Q But would you have any reason to disagree
22 if I were to tell you that Dexter Washington was
23 shooting at the beginning of that video?
24 MR. ELLIS: He does not know.
25 THE WITNESS: Yeah, I don't know. I mean,



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1 shots were fired. I don't know how many shots were
2 fired and I don't know at what point. I mean, I
3 believe we talked about this when you met with me at
4 the gym. I don't know. You can't tell by the video
5 at which point the firearm was actually fired.

6 Q (By Mr. Butler) All right. Anyway, at any
7 rate, you understand that shots were fired; is that
8 correct?

9 A I do understand an incident occurred and
10 shots were fired.

11 Q All right. Let me ask you this. Isn't it
12 true that once the car was no longer a threat to
13 Washington the shooting should have stopped?

14 A If he -- whatever time that legally he
15 felt that -- I mean, he felt that not only -- he
16 felt legally the car was no longer a threat, yes.

17 Q When the car wasn't a threat any more, the
18 shooting should have stopped; is that right?

19 A Legally, yes.

20 MR. BUTLER: All right. No further
21 questions.

22 MR. ELLIS: I have just two additional
23 questions, I think.

24 FURTHER EXAMINATION
25 BY-MR. ELLIS:

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1 Q Do you believe that there is any
2 additional training that Metro Security should have
3 provided Mr. Washington before he was allowed to
4 work as an armed security guard after he completed
5 your program?

6 A It's my belief that ongoing training
7 should always happen. But the requirements, the
8 state only requires 40 hours of training, and then
9 eight hours every year.

10 Q Do you believe that Dexter Washington,
11 when he completed your program, was qualified to go
12 work as an armed security guard?

13 A He was certified, yes. I mean, each human
14 being as far as saying they are qualify, it's hard
15 to say after 40 hours of training in my class.

16 Q Did you believe that he was -- would you
17 have allowed him to go work as an arm secured guard
18 after he completed your program?

19 A Yes, because he was very competent and
20 intelligent.

21 Q And you believe he was competent as an
22 armed security guard and he finished your program?

23 A Yes, sir. And due to the fact that we
24 had, our class alone we would conversate more than
25 usual in class. Because me and him had basically,

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1 the armed portion was a solo between me and him, we
2 had more time to talk between me and him than my
3 usual class that involves maybe five students or ten
4 students where everybody is trying to get
5 conversation in.

6 Q So what you're saying, I guess, Mr.
7 Washington's class with you was a much smaller
8 class?

9 A Yes, sir.

10 Q It was a class with just you and him?

11 A Yes, sir.

12 Q So you had one-on-one training with him?

13 A Yes, sir.

14 MR. BUTLER: Objection. Leading.

15 MR. ELLIS: I was just trying to clarify
16 what he already said for the record.

17 Q (By Mr. Ellis) And based on your
18 one-on-one training with him, did you believe he was
19 competent to work as an armed security guard without
20 further training on being an armed security guard?

21 A Yes, I found him to be competent, and the
22 exact reason I found him to be competent is because
23 of how he spoke about other mishaps with other
24 security officers that he had been in contact with.
25 One, I can't remember where this guy

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1 worked at, but one in particular he was talking
2 about a guy that was really gung-ho and lights and
3 sirens all over the guy's car and all this other
4 stuff. And he said, "Steve, I don't want to be like
5 that. I'm trying to be, you know, trying to keep
6 out of trouble, stay out of trouble."

7 MR. BUTLER: Objection. Hearsay.

8 Q (By Mr. Ellis) Well, that's what he told
9 you?

10 A That's what Dexter told me.

11 MR. BUTLER: Same objection.

12 Q (By Mr. Ellis) And do you believe -- you
13 understand in this case that shots were fired, I
14 think that's what plaintiffs counsel was just going
15 over with you?

16 A Yes.

17 Q Are you aware of any additional training
18 that you can think of that could have prevented
19 shots being fired in this particular case based on
20 the facts you know?

21 A No, sir.

22 Q Why is that?

23 A Because based on, everything is based on
24 scenarios. We look at the one from yesterday with
25 the Officer, was not -- was convicted of his crime,

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1 but didn't get any jail time. He fired his weapon
2 through a wall. This is a Police Officer that has
3 over 600 hours of training, and he fired his weapon
4 through a wall and struck an unarmed man and killed
5 him.

6 There is no way to say that when a person
7 walks out of the classroom that they are going to be
8 placed into a situation where things may or may not
9 go right or wrong for them. But my goal as an
10 instructor has always been embed the law into them
11 and force them to stay into the law and take their
12 feelings out of it.

13 MR. ELLIS: No further questions.

14 MR. BUTLER: No questions. Thank you for
15 your time.

16 MR. ELLIS: I can let you know, you have
17 the ability to read and sign the transcript.

18 THE WITNESS: No, I just, I just finished
19 a deposition.

20 MR. ELLIS: Are you going to read and sign
21 or do you want to waive it?

22 MR. BUTLER: You can do whatever you want.
23 Most folks waive it. But you can read through it
24 all and make sure all the words are right to you if
25 you want.

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1 MR. ELLIS: Especially since it will be a
2 public record --

3 THE WITNESS: No, it's fine. I'll waive
4 it.

5 MR. ELLIS: You're going to waive it.

6 VIDEOGRAPHER: This deposition is
7 concluded at 11:07 a.m.
8 (Deposition concluded at 11:07 a.m.)
9 (Signature waived)

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1 CERTIFICATE

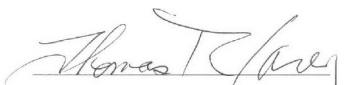
2 STATE OF GEORGIA:
3 COUNTY OF FULTON:
4

5 I hereby certify that the foregoing
6 transcript was taken down, as stated in the caption,
7 and the colloquies, questions, and answers were
8 reduced to typewriting under my direction; that the
9 transcript is a true and correct record of the
10 evidence given upon said proceeding.

11 I further certify that I am not a relative
12 or employee or attorney of any party, nor am I
13 financially interested in the outcome of this
14 action.

15 This the 28th day of April, 2016.

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THOMAS R. CAREY, RPR, CCR-B-1715

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1 DISCLOSURE

2

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