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1 IN THE UNITED STATES DISTRICT COURT  
 2 NORTHERN DISTRICT OF ALABAMA  
 3 SOUTHERN DIVISION  
 4  
 5 DANA ANDERSON; BELINDA BEVERLY;  
 6 KATHY LACKEY; and KARI WALKER,  
 7 Plaintiffs,  
 8 vs.  
 9 SURGERY CENTER OF CULLMAN, INC.;  
 10 SURGERY CENTER OF CULLMAN, LLC;  
 11 SURGICAL CARE AFFILIATES, LLC; and  
 12 KEVIN JOHNSON, M.D., individually,  
 13 Defendants.  
 14  
 15 CIVIL ACTION NUMBER: CV-12-RRA-0598-S  
 16  
 17 DEPOSITION: DR. KEVIN JOHNSON  
 18 VOLUME 1 - APRIL 26, 2013  
 19  
 20 STIPULATIONS  
 21 IT IS STIPULATED AND AGREED by  
 22 and between the parties through their  
 23 respective counsel that the deposition

1 APPEARANCES  
 2 Appearing for the Plaintiffs:  
 3 HAYNES & HAYNES, P.C.  
 4 By: Alicia K. Haynes, P.C.  
 5 By: Gina E. Pearson, Esq.  
 6 1600 Woodmere Drive  
 7 Birmingham, Alabama 35226  
 8 Appearing for the Defendants Surgery  
 9 Center of Cullman, Inc.; Surgery Center  
 10 of Cullman, LLC; and Surgical Care  
 11 Affiliates, LLC:  
 12 LITTLER MENDELSON, P.C.  
 13 By: Aimee P. Keane, Esq.  
 14 420 20th Street, North  
 15 2300 Wells Fargo Tower  
 16 Birmingham, Alabama 35203  
 17 Appearing for the Defendant Dr. Kevin  
 18 Johnson, M.D.:  
 19 JOHNSTON BARTON PROCTOR & ROSE  
 20 By: Mac B. Greaves, Esq.  
 21 By: Justin Barkley, Esq.  
 22 Colonial Brookwood Center  
 23 Suite 901

1 of DR. KEVIN JOHNSON may be taken on  
 2 April 26, 2013, before Sallie NeSmith  
 3 Gunter, Certified Court Reporter of the  
 4 State of Alabama, ACCR License Number  
 5 37, Commissioner and Notary Public, at  
 6 the law offices of Haynes & Haynes,  
 7 P.C., 1600 Woodmere Drive, Birmingham,  
 8 Alabama.  
 9 IT IS FURTHER STIPULATED AND  
 10 AGREED that it shall not be necessary  
 11 for any objections to be made by  
 12 counsel to any questions except as to  
 13 form or leading questions, and that  
 14 counsel for the parties may make  
 15 objections and assign grounds at the  
 16 time of trial or at the time said  
 17 deposition is offered in evidence or  
 18 prior thereto.  
 19  
 20  
 21  
 22  
 23

1 569 Brookwood Village  
 2 Birmingham, Alabama 35203  
 3 Also Present:  
 4 Belinda Beverly  
 5 Kathy Lackey  
 6 Kari Walker  
 7 Dana Anderson  
 8 Lori Bates  
 9 Certified Court Reporter:  
 10 Sallie NeSmith Gunter, CCR, CSR  
 11 ACCR License Number 37  
 12 Videographer:  
 13 Susan Jackson Pope, CLVS  
 14 Video Visions  
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 23

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23

1 I, Sallie NeSmith Gunter, a  
2 Certified Court Reporter of the State  
3 of Alabama, ACCR License Number 37,  
4 acting as Commissioner, certify that on  
5 this date there came before me at the  
6 law offices of Haynes & Haynes, P.C.,  
7 1600 Woodmere Drive, Birmingham,  
8 Alabama, on April 26, 2013, beginning  
9 at or about 9:15 A.M., DR. KEVIN  
10 JOHNSON, witness in the above cause,  
11 for oral examination, whereupon, the  
12 following proceedings were had:  
13

14 THE VIDEOGRAPHER: This begins  
15 videotape number one in the deposition  
16 of Kevin Johnson, M.D., in the matter  
17 of Dana Anderson, Belinda Beverly,  
18 Kathy Lackey, and Kari Walker versus  
19 the Surgery Center of Cullman,  
20 Incorporated; Surgery Center of  
21 Cullman, LLC; Surgical Care Affiliates,  
22 LLC; and Kevin Johnson M.D.,  
23 individually, Civil Action Number

1 CV-12-RRA-0598-S. We are on the record  
2 at 9:15 A.M. Today is Friday, April  
3 the 26th, 2013. The deposition is  
4 taking place at the offices of Haynes &  
5 Haynes, 1600 Woodmere Drive,  
6 Birmingham, Alabama. My name is Susan  
7 Pope.

8 Would counsel identify  
9 yourself and state whom you represent,  
10 and then, Madam Court Reporter, please  
11 swear in the witness.

12 MS. HAYNES: Alicia Haynes and  
13 Gina Pearson for the plaintiffs.

14 MR. GREAVES: Mac Greaves,  
15 Justin Barkley for Dr. Johnson.

16 MS. KEENE: Amy Keane for the  
17 Surgery Center of Cullman, both  
18 entities, and Surgical Care Affiliates.

19 THE COURT REPORTER: All  
20 right. Would y'all like the usual  
21 stipulations?

22 MR. GREAVES: Yes.

23 MS. HAYNES: That's fine.

1 MR. GREAVES: And Dr. Johnson  
2 would like to read and sign his  
3 deposition.

4 THE COURT REPORTER: All  
5 right. Would you raise your right  
6 hand, please, sir, to be sworn?  
7

8 DR. KEVIN JOHNSON,  
9 being first duly sworn, was examined  
10 and testified as follows:

11 EXAMINATION BY MS. HAYNES:

12 Q. Will you state your full name  
13 for the record, please.

14 A. Kevin Gerald Johnson.

15 Q. Is that Gerald with a J or G?

16 A. G.

17 Q. And your address, please?

18 A.  
19 Cullman, Alabama

20 Q. And your date of birth?

21 A.

22 Q. And Social Security number,  
23 please, sir?

1 given a deposition before?

2 A. No, I haven't.

3 Q. Do you understand the oath  
4 that you've taken?

5 A. I do.

6 Q. Okay. Does that mean  
7 something to you?

8 A. It's an oath to God, as far as  
9 I'm concerned --

10 Q. Okay.

11 A. -- to tell the truth.

12 Q. All right. I've seen notes or  
13 references that you have referred in  
14 the past to yourself as the  
15 anti-Christ. Is that correct?

16 A. That is not correct.

17 Q. Okay. So the oath that you've  
18 taken today does mean something?

19 A. It does.

20 Q. Okay. And you deny ever  
21 making the comment that you were the  
22 anti-Christ?

23 A. I deny that comment.

1 A.

2 Q. And driver's license number?

3 A. It's an Alabama license  
4

5 Q. Any restrictions on that  
6 license?

7 A. None.

8 Q. Has it ever been revoked,  
9 suspended?

10 A. Never.

11 MR. GREAVES: I assume we have  
12 the same under-seal protection for  
13 Dr. Johnson's private information as  
14 the other?

15 MS. HAYNES: Absolutely.

16 MR. GREAVES: Thank you.

17 Q. (BY MS. HAYNES) You understand  
18 you're under oath today?

19 A. Yes, I do.

20 Q. Have you ever been under oath  
21 before?

22 A. No, I haven't.

23 Q. Ever testified in court or

1 Q. Okay. You have sat through I  
2 guess about five days of depositions,  
3 four days of which were my clients; is  
4 that correct?

5 A. Yes.

6 Q. Okay. And you understand the  
7 allegations that they have brought  
8 about you?

9 A. Yes.

10 Q. Okay. Have you ever been  
11 accused of sexual harassment in the  
12 past?

13 A. No.

14 Q. Ever been investigated for  
15 sexual harassment?

16 A. Yes.

17 Q. How many times?

18 A. Once.

19 Q. When was that?

20 A. That was Woodland Medical  
21 Center. I think the year may have been  
22 1999 or 2000.

23 Q. Who investigated you?

1 A. No.  
 2 Q. Okay. Did you ever ask her  
 3 the question who owns her?  
 4 A. No.  
 5 Q. Did you pay for a tattoo for  
 6 Ms. Potter?  
 7 A. No.  
 8 Q. Does she -- what's her tattoo  
 9 that she has?  
 10 A. She has multiple tattoos.  
 11 Q. What tattoo did she receive  
 12 while your relationship was going on?  
 13 A. It was either a tattoo of her  
 14 grandmother, something to do with her  
 15 grandmother, or I think she got a  
 16 tattoo, a black star on I think it was  
 17 her right ear that was similar to a  
 18 rock star, Bjork, or someone that she  
 19 enjoyed.  
 20 Q. Okay. Any Chinese characters?  
 21 A. No.  
 22 Q. Does she have a tattoo that  
 23 says "eternal slave"?

1 A. No.  
 2 Q. And you did not pay for that  
 3 tattoo?  
 4 A. No.  
 5 Q. Okay. When's the last time  
 6 you talked to Ms. Potter?  
 7 A. I talked to Ms. Potter this  
 8 week.  
 9 Q. Okay. What day?  
 10 A. She's called me a couple of  
 11 times. She was -- felt like she was  
 12 being harassed by Kari.  
 13 Q. Okay. Did she tell you she  
 14 had a conversation with me?  
 15 A. No.  
 16 Q. If she told you -- me -- well,  
 17 let me ask you this. Strike that. Any  
 18 reason she would not be truthful about  
 19 you?  
 20 A. I can't think of any.  
 21 Q. Okay. Do you know of any  
 22 reason she would tell me that you paid  
 23 for a tattoo that says "eternal slave"?

1 A. No.  
 2 Q. And you deny that that --  
 3 A. Yes.  
 4 Q. That you did that?  
 5 A. Yes.  
 6 Q. And you deny that you  
 7 requested her to have a tattoo that  
 8 says "eternal slave"?  
 9 A. I do.  
 10 Q. Okay. Tell me about the  
 11 tattoo that -- well, you said Ms.  
 12 Hunter had tattoos before --  
 13 A. She.  
 14 Q. -- your relationship?  
 15 A. She had a single tattoo.  
 16 Q. What was the single tattoo,  
 17 what was the depiction?  
 18 A. It was a Sanskrit tattoo  
 19 across her low back.  
 20 Q. Similar to Kari's?  
 21 A. I guess it would be the same  
 22 region, yes.  
 23 Q. Describe it, please.

1 A. Sanskrit letters, black  
 2 letters across her low back.  
 3 Q. What did the letters mean?  
 4 A. She said that they meant  
 5 "awakened."  
 6 Q. Did you look it up?  
 7 A. No.  
 8 Q. Did you pick out what tattoo  
 9 she would have?  
 10 A. No.  
 11 Q. Did she get another tattoo?  
 12 A. No.  
 13 Q. That was the only tattoo she  
 14 had during the entire relationship with  
 15 you?  
 16 A. Yes.  
 17 Q. Did you pick out the tattoo  
 18 that Kari Walker had done to her lower  
 19 back?  
 20 A. No.  
 21 Q. The two of you did not discuss  
 22 that?  
 23 A. She discussed it with everyone

1 Q. You'll have to come back with  
2 that one. Gräfe --  
3 A. -- Z-Z-P-A-Z-Z-E-R.  
4 Q. What does that mean?  
5 A. GazzPazzer, it's a -- a long  
6 way of saying "gas passer," which is a  
7 derogatory term most medical  
8 specialties call anesthesiologists.  
9 Q. Okay.  
10 A. We're just known as gas  
11 passers.  
12 Q. And --  
13 A. I know, it's Out of Gas is the  
14 name of -- Out of Gazz, G-A-Z-Z, is the  
15 name of it.  
16 Q. Of your blog?  
17 A. Yes.  
18 Q. Out of Gas?  
19 A. Out of G-A-Z-Z, Out of Gazz.  
20 Q. But you've never posted  
21 anything or blogged?  
22 A. Never blogged a single thing  
23 on it.

1 Q. Reblogged anything?  
2 A. Never reblogged anything.  
3 Q. Had any followers?  
4 A. No.  
5 Q. Followed anyone?  
6 A. No.  
7 Q. Any other social media?  
8 A. No.  
9 Q. Do you know what the Cullman  
10 Underground is?  
11 A. Yes.  
12 Q. What is it?  
13 A. It's a -- anonymous posting  
14 board for Cullman, Alabama.  
15 Q. Have you ever posted on that?  
16 A. I have in the past, yes.  
17 Q. How many times?  
18 A. Maybe a half a dozen.  
19 Q. Do you have those postings?  
20 A. No.  
21 Q. Did you post as Juan Kryptic  
22 Juan?  
23 A. No. You post anonymously on

1 it.  
2 Q. Okay. What did you post  
3 about?  
4 A. The last thing I remember  
5 posting about was during the CON  
6 hearings we had in -- back in maybe  
7 about '99, 2000.  
8 Q. That's the thing you remember?  
9 A. Yes. It was only when we were  
10 in a big lawsuit with the Cullman  
11 Regional Medical Center was anything  
12 posted on it by me.  
13 Q. Did you post about the Cullman  
14 Regional Medical Center?  
15 A. No, I posted about the Surgery  
16 Center of Cullman.  
17 Q. Did you post like you were a  
18 patient?  
19 A. No. I posted about the  
20 advantages of an ambulatory surgery  
21 center.  
22 Q. Anything else you've posted on  
23 Cullman Underground?

1 A. No.  
2 Q. Have you posted about any  
3 person on Cullman Underground?  
4 A. No.  
5 Q. Any other blogging or postings  
6 you've done in the last ten years?  
7 A. I posted on an AR-15 site, I  
8 think, some questions about ammunition,  
9 but that's -- I think that's it.  
10 Q. What did you post?  
11 A. Some questions about some  
12 ammunition, federal as compared to UMS.  
13 Q. What's AR-15?  
14 A. It's a rifle.  
15 Q. What's the site that you  
16 posted?  
17 A. AR-15, I think it was  
18 AR15.com.  
19 Q. And how did you post,  
20 anonymous?  
21 A. I don't remember on that.  
22 That's been quite a few years ago too.  
23 Q. Do you have an AR-15?

1 A. Yes.  
 2 Q. Is that a semi-automatic?  
 3 A. Yes.  
 4 Q. Is it considered an assault  
 5 weapon?  
 6 A. Define an assault weapon.  
 7 Q. Under the terms that we refer  
 8 to assault weapons in today's society.  
 9 A. Assault weapon is a fully  
 10 automatic weapon.  
 11 Q. What does the A stand for in  
 12 the AR?  
 13 A. It's not for assault.  
 14 Q. Does it mean automatic rifle?  
 15 A. I don't know what it means. I  
 16 know it's not an assault.  
 17 Q. Okay.  
 18 A. I think it was just the first  
 19 in the series.  
 20 Q. How many postings did you make  
 21 on AR15?  
 22 A. One or two.  
 23 Q. When?

1 A. That is it.  
 2 Q. Under assault weapons, as you  
 3 would define those?  
 4 MR. GREAVES: Object to the  
 5 form.  
 6 A. Three AR-15s.  
 7 Q. Okay. What other weapons do  
 8 you have?  
 9 A. I have multiple shotguns.  
 10 Q. What does "multiple" mean,  
 11 over ten, less than ten?  
 12 A. Less than ten.  
 13 Q. Over five?  
 14 A. Yes, probably five to six.  
 15 Q. Okay. What else?  
 16 A. Probably about six or eight  
 17 pistols.  
 18 Q. What else?  
 19 A. That is all.  
 20 Q. Any knives?  
 21 A. No.  
 22 Q. Do you collect any other  
 23 weapons?

1 A. Probably in -- I think it was  
 2 actually before I went to SCA.  
 3 Q. Probably before or do you know  
 4 for sure?  
 5 A. I think it was around that  
 6 time.  
 7 Q. Okay. How many other assault  
 8 weapons do you have?  
 9 MR. GREAVES: Object to the  
 10 form.  
 11 A. I have --  
 12 MS. HAYNES: What is wrong  
 13 with the question?  
 14 MR. GREAVES: I don't think  
 15 we've got a definition of assault  
 16 rifle.  
 17 MS. HAYNES: He's answering,  
 18 so evidently he does.  
 19 MR. GREAVES: Well, if he can.  
 20 I mean, I'm just objecting to form.  
 21 MS. HAYNES: Okay.  
 22 A. I have three AR-15s.  
 23 Q. What else?

1 A. No.  
 2 Q. Just as a collector?  
 3 A. No.  
 4 Q. Where have you bought your  
 5 weapons, the shotguns, pistols, and the  
 6 three AR-15s?  
 7 A. Multiple places.  
 8 Q. Where?  
 9 A. Gander Mountain.  
 10 Q. Okay. Is that like a sporting  
 11 goods place or from an individual?  
 12 A. It's a sporting goods place.  
 13 Q. Called Gander Mountain?  
 14 A. Gander Mountain.  
 15 Q. Is that online?  
 16 A. No.  
 17 Q. Okay. Where is it?  
 18 A. It's in Huntsville.  
 19 Q. Okay. Not familiar with that.  
 20 Where else?  
 21 A. Cullman Pawn, Cullman Gun and  
 22 Pawn or something like that.  
 23 Q. Where else?

1 A. Van Sporting Goods.  
 2 Q. V-A-N-N?  
 3 A. I think it's just one N.  
 4 Q. V-A-N. Where is it?  
 5 A. It's in Cullman.  
 6 Q. And is it a sporting goods or  
 7 a gun shop?  
 8 A. It's a sporting goods.  
 9 Q. Okay. Any other places you've  
 10 bought weapons?  
 11 A. I bought some at gun shows.  
 12 Q. What gun shows?  
 13 A. Birmingham.  
 14 Q. How many gun shows have you  
 15 bought weapons?  
 16 A. I think two.  
 17 Q. Which gun shows, do you  
 18 recall?  
 19 A. BJCC.  
 20 Q. I understand that, but what  
 21 year?  
 22 A. No.  
 23 Q. You don't remember?

1 A. No.  
 2 Q. In the last five years?  
 3 A. Yes.  
 4 Q. Any place else you've bought  
 5 weapons?  
 6 A. There's another shop in  
 7 Huntsville, but I can't remember the  
 8 name of it.  
 9 Q. Sporting goods or a gun shop?  
 10 A. Gun shop.  
 11 Q. But in Huntsville?  
 12 A. In Huntsville.  
 13 Q. You can't remember the name?  
 14 A. No.  
 15 Q. Do you still have the bill of  
 16 sale?  
 17 A. Unlikely.  
 18 Q. Did you register any of those  
 19 guns?  
 20 A. No.  
 21 Q. Do you have a gun permit for  
 22 any?  
 23 A. Yes.

1 Q. Which ones?  
 2 A. I have a gun permit to carry a  
 3 concealed weapon.  
 4 Q. When did you get that?  
 5 A. Probably less than ten years  
 6 ago.  
 7 Q. And what was the reason?  
 8 A. Because I was always working  
 9 late in an area that had a lot of  
 10 narcotics.  
 11 Q. What area was -- were you  
 12 working that had a lot of narcotics?  
 13 A. The hospital.  
 14 Q. What is a Win Q3269?  
 15 A. I've never heard of that  
 16 before.  
 17 Q. What would be an M855?  
 18 A. I've never heard of that  
 19 before.  
 20 Q. On the website you gave us, we  
 21 just looked that up, and under that  
 22 name that you gave, it was an entry  
 23 that you wanted to buy in bulk Win

1 Q3269 and M855.  
 2 A. I'm sorry, I don't know what  
 3 you're talking about.  
 4 Q. Okay. Do you have a weapon on  
 5 you today?  
 6 A. No.  
 7 Q. Do you have one in your car?  
 8 A. Yes.  
 9 Q. And why are -- why do you have  
 10 one in your car today?  
 11 A. I always carry one when I  
 12 travel.  
 13 Q. What do you have in your car?  
 14 A. A Glock.  
 15 Q. Is that one of the pistols?  
 16 A. Yes.  
 17 Q. Can you tell me what type  
 18 pistols you have other than the Glock?  
 19 A. I have two or three Glocks, my  
 20 wife has one Glock, I have a Kel-Tec  
 21 P3AT.  
 22 Q. Say that again.  
 23 A. K-E-L dash T-E-C P3AT.



1 Q. What is that?  
 2 A. It's a pistol.  
 3 Q. What type of pistol?  
 4 A. Semi-automatic.  
 5 Q. When did you buy that?  
 6 A. Probably about three or four  
 7 years ago.  
 8 Q. Why?  
 9 A. Because I wanted it.  
 10 Q. Okay. Anything else?  
 11 A. Huh?  
 12 Q. Any other pistols?  
 13 A. Yes.  
 14 Q. What?  
 15 A. I have three .22 target  
 16 pistols.  
 17 Q. Three separate?  
 18 A. Three separate pistols.  
 19 Q. .22s?  
 20 A. Uh-huh.  
 21 Q. Okay. What else?  
 22 A. I have a Taurus 380.  
 23 Q. What is that?

1 A. B-E-N-E-L-L-I .  
 2 Q. Okay.  
 3 A. Cordova, C-O-R-D-O-V-A. I  
 4 have a Benelli Montelfro --  
 5 Montefeltro.  
 6 Q. Can you spell that?  
 7 A. Not really, something like  
 8 that.  
 9 Q. M-O-N-T-E-L?  
 10 A. Yes.  
 11 Q. Okay.  
 12 A. And I have a 16-gauge single  
 13 shot, a Remington 1187, and I think  
 14 that's all.  
 15 Q. That was five that I count.  
 16 A. Okay.  
 17 Q. Five shotguns?  
 18 A. That's all I can think of.  
 19 Q. And did you tell me three  
 20 Glocks?  
 21 A. Three Glocks.  
 22 Q. That's a G with Glock, isn't  
 23 it?

1 A. It's just a small pocket  
 2 pistol.  
 3 Q. Okay. What else?  
 4 A. I think that's all. No, I  
 5 have a Steyr, S-T-E-Y-R.  
 6 Q. And what is it?  
 7 A. It's a pistol.  
 8 Q. Automatic, semi-automatic?  
 9 A. Semi-automatic.  
 10 Q. Okay. Any other pistols?  
 11 A. None that I can think of at  
 12 this point.  
 13 Q. Okay. And you said multiple  
 14 shotguns. What type shotguns do you  
 15 have?  
 16 A. I have a Beretta over and  
 17 under.  
 18 Q. Okay.  
 19 A. Then I have another Beretta  
 20 over and under that's a Silver Pigeon.  
 21 Q. Okay.  
 22 A. I have a Benelli Cordova.  
 23 Q. That's a B, correct, Benelli?

1 A. G-L-O-C-K.  
 2 Q. Okay. Any other weapons as  
 3 you sit here and having recalled those?  
 4 A. Mossberg shotgun 590 or 500,  
 5 one or the other.  
 6 Q. Are you a member of a hunting  
 7 club?  
 8 A. Yes.  
 9 Q. Which one?  
 10 A. Maple Ridge.  
 11 Q. Where is that?  
 12 A. It's in Cullman, County Road  
 13 420.  
 14 Q. Is that -- it's Maple Ridge  
 15 Hunting Club or Shooting Club?  
 16 A. Shooting, I think.  
 17 Q. How many members?  
 18 A. Don't know.  
 19 Q. How often do you shoot?  
 20 A. I haven't shot in two years.  
 21 Q. Do you hunt?  
 22 A. I hunt birds maybe once every  
 23 couple of years.

1 Q. Anything else?  
 2 A. No.  
 3 Q. Did you bring your guns into  
 4 the workplace at Surgical Care?  
 5 A. They were in my car.  
 6 Q. Did you bring them in? is my  
 7 question.  
 8 A. I brought some gifts in, yes,  
 9 not my guns.  
 10 Q. The gifts you brought in, were  
 11 they guns?  
 12 A. Yes.  
 13 Q. Okay. And did you show those  
 14 around?  
 15 A. No.  
 16 Q. Who did you give the gifts to?  
 17 A. I have brought guns into the  
 18 workplace on three different occasions.  
 19 I brought them to my CRNAs at Woodland  
 20 Hospital, they got shotguns, Beretta  
 21 Silver Pigeons; I brought Kel-Tec  
 22 P3ATs, pistols, to my CRNAs in the box,  
 23 unloaded, no ammunition about three

1 Q. Okay. Why did you bring those  
 2 into the workplace?  
 3 A. To give to my CRNAs.  
 4 Q. Okay. Where would you  
 5 purchase the collapsible -- how did you  
 6 say it again, Justin?  
 7 MR. BARKLEY: You can --  
 8 MS. HAYNES: Carbines?  
 9 MR. BARKLEY: Most people say  
 10 it carbine.  
 11 A. Carbine, carbine.  
 12 MR. BARKLEY: It's spelled  
 13 C-A-R-B-I-N-E. It's a kind of rifle,  
 14 carbine rifle.  
 15 MS. HAYNES: Okay.  
 16 A. I don't remember where I got  
 17 those.  
 18 Q. (BY MS. HAYNES) Any other  
 19 times you've bought weapons into the  
 20 workplace?  
 21 A. No.  
 22 Q. Did that violate the -- any  
 23 workplace policy?

1 years ago; and Woody Locke, when he  
 2 retired, he got a commemorative rifle.  
 3 Q. What type?  
 4 A. A Uberti Henry rifle. That  
 5 was something that all the people gave  
 6 money for him.  
 7 Q. You said three different  
 8 occasions you brought weapons into the  
 9 workplace?  
 10 A. And some collapsible carbines.  
 11 Q. What are collapsible carbines.  
 12 A. Carbines, they fold up.  
 13 They're for like taking on hunting -- I  
 14 mean, like backpacking. They fold up,  
 15 throw it in your backpack.  
 16 Q. Shotgun?  
 17 A. Pistol-caliber rifle.  
 18 Q. And why did you bring the  
 19 collapsible --  
 20 MR. BARKLEY: C-A-R-B-I-N-E.  
 21 Q. -- carbines?  
 22 MR. BARKLEY: I say carbine,  
 23 but yeah, same thing.

1 A. Yes.  
 2 Q. So why did you do it?  
 3 A. I wasn't aware there was a  
 4 workplace policy at that point for  
 5 that. I had discussed it with the  
 6 safety officer. The safety officer  
 7 didn't have a problem with it.  
 8 Q. Who was safety officer?  
 9 A. Kari Walker.  
 10 Q. You told Ms. Walker you were  
 11 bringing weapons in?  
 12 A. Absolutely.  
 13 Q. And she said, "I have no  
 14 problem with it"?  
 15 A. She knew about it, didn't have  
 16 a problem with it.  
 17 Q. That's not my question. My  
 18 question was: And she told you she did  
 19 not have a problem?  
 20 A. She said she wanted to be  
 21 there when they were given.  
 22 Q. Were they wrapped or  
 23 unwrapped?