

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE

KATERI LYNNE DAHL,  
Plaintiff,

VS.

CHIEF KARL TURNER, in his individual  
capacity only; OFFICER JOHN DOES 1-3,  
in their individual capacities only;  
and CITY OF JOHNSON CITY,  
Defendants.

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CASE NO.  
2:22-CV-00072-KAC-CRW

DEPOSITION OF

**JOE JAYNES**

(Taken November 21, 2023)

APPEARANCES:

COUNSEL FOR THE PLAINTIFF:

ALEXIS I. TAHINCI  
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1 quote/unquote, FBI cases. There are what they call  
2 guardians, which are pre-assessments that they'll give me  
3 to look at that involve subjects in and around Johnson  
4 City.

5 Q. So it sounds to me like sometimes the FBI is giving you  
6 matters to work on, and sometimes you're taking matters  
7 from JCPD and giving them to the FBI to work on. Is that  
8 accurate?

9 A. Yes.

10 Q. Okay. And let's drill down a little bit into your period  
11 of time when you were a part-time task force officer,  
12 because obviously the events in this case we're mostly  
13 looking at are events that occurred in 2020 and 2021. So  
14 during that period of time you were a part-time task force  
15 officer, correct?

16 A. Correct.

17 Q. So you were -- in your work with JCPD during that time  
18 period, you were assigned to the criminal investigation  
19 division, correct?

20 A. Correct.

21 Q. Okay. How did you divide your time between CID work for  
22 JCPD and task force work?

23 A. CID works a four-day work week, four ten-hour shifts.

24 Q. Okay.

25 A. And I would go one day, you know, we might work one pay

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1 period it might be Monday through Thursday, and so on  
2 Friday I would go to the FBI. And then vice versa, if we  
3 were working Tuesday through Friday, then I would go on  
4 Mondays.

5 Q. Okay. So you were at the FBI one day a week and then in  
6 CID four days a week.

7 A. Yes.

8 Q. So you were essentially doing a full-time CID position,  
9 plus the FBI task force duties on top of that?

10 A. Correct.

11 Q. Okay. Who was your supervisor in 2020 and 2021?

12 A. I believe it was Matt Gryder.

13 Q. Okay. Who was your supervisor within the FBI?

14 A. It was -- at one point it was Jeff Blanton was the  
15 supervisory agent for Johnson City, and then J.D. Anderson  
16 took over. I cannot recall when Jeff retired.

17 Q. Okay.

18 A. I don't know the time frame.

19 Q. So during that period of time when you were a part-time  
20 task force officer, what -- I'm going to get very  
21 mechanical here. What were you doing in the FBI office on  
22 that one day a week?

23 A. If there was -- if there was a guardian or something, I  
24 would look into it, but a lot of the times I would use  
25 that to catch up on CID casework.

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1           about any investigations in which Sean Williams was a  
2           suspect?

3           A.   No.

4           Q.   Did you at some point learn about JCPD officers' visit to  
5           Sean Williams apartment on May 5th, 2021?

6           A.   After the fact, yes.

7           Q.   When you say after the fact, what do you mean by that?

8           A.   Really, I think the first time I talked about it was with  
9           one of the meetings with Mr. Herrin.

10          Q.   Okay.  So prior to the filing of this lawsuit, you were  
11          not aware of JCPD officers' visit to Sean Williams'  
12          apartment on May 5th, 2021.  Is that accurate?

13          A.   Correct, yes.

14          Q.   Do you know Kat Dahl?

15          A.   Yes.

16          Q.   How would you describe her?

17          A.   I mean, she was our SAUSA for a time.  She seemed nice,  
18          possibly a little overwhelmed as far as work goes.

19          Q.   Tell me about that.  What leads you to that conclusion?

20          A.   Well, like I said, the only thing I did was try to  
21          prosecute gun cases, and it was kind of hard to  
22          communicate with her.

23          Q.   Tell me about that.

24          A.   Just I would call her and not receive an answer.

25          Q.   By what means did you typically communicate with Ms. Dahl?

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1 A. Either phone call or text.  
2 Q. Did you E-mail with her as well?  
3 A. Yes.  
4 Q. Did you use both a City issued and personal cell phone to  
5 communicate with Ms. Dahl?  
6 A. The City cell phone.  
7 Q. Only your City cell phone?  
8 A. To my knowledge, yes.  
9 Q. Was Jerry Greer your case?  
10 A. Yes.  
11 Q. And did Ms. Dahl prosecute Mr. Greer federally?  
12 A. Yes.  
13 Q. Did you ever interact with Ms. Dahl about Sean Williams?  
14 A. I remember her talking about it prior to grand jury one  
15 day.  
16 Q. What do you remember about that?  
17 A. Just -- she was just saying that he was a bad person, he  
18 was a sicko.  
19 Q. Do you remember when that grand jury would have been?  
20 A. I do not, no.  
21 Q. How many times did you take cases to grand jury with Kat  
22 Dahl?  
23 A. I can't recall.  
24 Q. Do you remember, was the conversation that you just  
25 described with Kat Dahl about Sean Williams before or

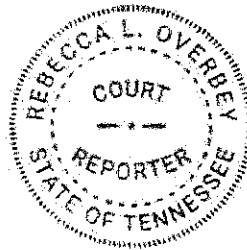
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C E R T I F I C A T E

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of JOE JAYNES was taken at the time and place and for the purpose as stated in the Caption; that the witness was duly sworn by me before deposing; that the said deposition was recorded electronically and was later transcribed to typewriting, using computer technology; and that the foregoing is a true and accurate transcript of the proceedings to the best of my knowledge, ability and understanding.

WITNESS my hand and official seal at my office in Kingsport (Sullivan County) Tennessee on this the 29th day of November, 2023.



*Rebecca Overbey*

Rebecca Overbey  
LICENSED COURT REPORTER  
State of Tennessee  
LCR #078

My License Expires:

June 30, 2024

\*\*\*CERTIFIED ONLY IF AFFIXED SEAL IS GREEN\*\*\*