

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

**WAYNE TAYLOR**

(Taken October 18, 2023)

APPEARANCES:

COUNSEL FOR THE PLAINTIFF:

HUGH A. EASTWOOD  
Attorney at Law  
7911 Forsyth Blvd., Ste. 300  
St. Louis, MO 63105-3825

ALEXIS I. TAHINCI  
TAHINCI LAW FIRM  
105 Ford Avenue, Ste. 3  
Kingsport, TN 37663

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1 office obtains an indictment, do they send that  
2 information without request to probation or do they wait  
3 to get a request from probation?

4 A. No, there is no wait for request from probation. Someone  
5 from our office will send the identifiers to probation so  
6 they have that and they can do their work-up on that  
7 particular defendant ahead of time and be prepared for  
8 them to hit the building. We don't wait on a request.  
9 That's something pro forma that usually a support person,  
10 but however it's worked out, a support person or the  
11 attorney will send to probation.

12 Q. Do you know any reason that Ms. Dahl repeatedly would not  
13 have -- would have had communication problems with  
14 probation?

15 MR. EASTWOOD: Objection.

16 Q. Or not responding to requests from probation?

17 A. No, I think that's part of this E-mail here. And I don't  
18 think what I'm talking about here is identifiers. That  
19 may have played some smaller role in it, but the main  
20 complaint that I would get from probation would just be an  
21 overall lack of responsiveness that they would reach out  
22 to try to talk to Kat about a given case. And the thing I  
23 would normally recall is that they would reach out, you  
24 know, after a defendant is convicted, but prior to that  
25 defendant being sentenced there may be certain

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1           enhancements that might apply for that particular  
2           sentence, and our probation office will sometimes reach  
3           out, what is United States' position on this, you know,  
4           does United States support that enhancement, do they not  
5           support that enhancement. Oftentimes they will ask -- you  
6           know, for every plea agreement or conviction there will be  
7           a specific factual basis that's included that basically  
8           says what that one person did, you know, to justify the  
9           charges, but that doesn't mean that's all the evidence in  
10          the case. So routinely, basically in every case almost,  
11          probation will reach out and ask is there anything else,  
12          is there anything else that you have as discovery or you  
13          want to provide for sentencing or that you feel is  
14          relevant. I think it's those types of things that I heard  
15          from probation more often, that they would reach out to  
16          Kat and they were not getting a response. So that is this  
17          E-mail, I remember, because you can probably tell the tone  
18          was a little bit different, and especially coming off the  
19          February 16th E-mail about the one case and the last  
20          minute nature of it. But by this point, I had been talked  
21          to by the supervisor at the probation office a number of  
22          times about the lack of responsiveness from Kat. And  
23          that's where I felt -- and although I had talked to her  
24          before, it took another notch up because the reputation of  
25          our office is paramount. And if nothing else, that's

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1 something I feel incredibly strong about is  
2 unresponsiveness. We all have smart phones. We're  
3 available all the time. And if we're not responding to  
4 probation, probation is also an arm of the court, and that  
5 just affects our overall credibility as an office. It  
6 hurts our reputation, and that's not something that I'm  
7 going to allow to continue to happen. So that's kind of  
8 the nature of what is going on here is to address this and  
9 make sure this stops and that the communication and  
10 responsiveness improves at that point.

11 Q. And in that second sentence of the second paragraph, I  
12 want your -- and this is kind of going over what you just  
13 said basically. I want your reputation and the reputation  
14 of this office to remain very high, correct?

15 A. It is. And that's a good point, I'm obviously concerned  
16 about Kat's own reputation at that point, so absolutely,  
17 yes.

18 Q. And you are putting this sentence in the E-mail trying to  
19 get her attention, yes?

20 A. That's fair.

21 Q. Okay. You've talked to her and it hadn't seemed to fix,  
22 so now you're putting something in writing, as you said a  
23 minute ago, kind of taking it up a notch.

24 A. Yes.

25 Q. Is that fair?

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1 A. Yes.

2 Q. Okay. And then you say, I know there is a continued  
3 learning curve and there is a lot to learn, but if there  
4 is anything you would like to discuss with me, please feel  
5 free. As for now, if you've not -- if you -- if not done  
6 already, please make sure you rectify the issues on the  
7 complaint and superseding indictment, thanks. She had  
8 been -- she began as a SAUSA, I think, in September of  
9 2019, okay? We're now to February of 2021. I kind of  
10 interpret the learning curve as trying to soften the blow  
11 of what you had just said. There is no learning curve for  
12 responding if an arm of the court, the probation office,  
13 reaches out to you and needs information. There is no  
14 learning curve for that, is there?

15 MR. EASTWOOD: Object to form.

16 A. No, a learning -- and that's probably accurate. A  
17 learning curve is more on how to practice in federal  
18 court, procedures, substantive law, things such as  
19 responding to probation, responding to the court,  
20 responding to defense attorneys. Those are complete  
21 fundamental things that I would expect everyone in our  
22 office to do. You don't need to learn that.

23 Q. She -- let me show you this. So let's make 1188 the next  
24 exhibit.

25 COURT REPORTER: 111.

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1 willingness to help with the case. I'm sure we would have  
2 had discussion that -- between myself and Kat about what  
3 federal charges were possible here, but at that point  
4 still being unknown if there could have been any. I have  
5 a very close working relationship with TBI, in particular  
6 with our supervisor, and thought it might be a good idea  
7 to bring TBI on potentially just to help Johnson City PD  
8 in any way they could, work it jointly, perhaps. So I  
9 reached out to talk with the supervisor at TBI, who is  
10 Chuck Kimbrell, to see if they would be interested or  
11 available to assist Johnson City PD.

12 Q. Did you discuss that with Chief Turner when you reached  
13 out to TBI?

14 A. I did not.

15 Q. Any reason not to?

16 A. No, none at all. I frankly just didn't think to do that  
17 at the time and probably should have, but no, I just  
18 reached out to TBI. And then as I understand it, they  
19 then reached out to the Johnson City Police Department to  
20 coordinate or talk about getting together and having a  
21 meeting.

22 Q. Did you have any further involvement with the TBI as it  
23 relates to Sean Williams?

24 A. I did not. I referred them on to the Johnson City Police  
25 Department and had no further involvement with TBI.

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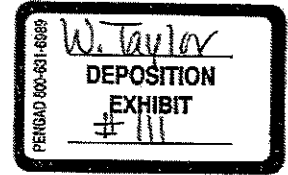
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1 Q. Okay. And as far as reaching out, you reaching out to  
2 TBI, again, you don't know where this is going to lead.  
3 It could lead to federal charges, and so in your view,  
4 you're acting within the scope of your duties reaching out  
5 to TBI. You're making an official contact with TBI.  
6 A. That's correct.  
7 Q. Okay. And if Kat Dahl was going to meet with TBI, then  
8 that would be within the scope of her duties, that would  
9 be your position as her supervisor at that period -- at  
10 that point in time.  
11 A. Yes.  
12 Q. Okay. And I believe I'm correct on this, I think at some  
13 point Tom McCauley came out to the Johnson City Police  
14 Department with Kat Dahl and interviewed one of the Jane  
15 Does, and that would also be fine with you as far as  
16 within the scope of their employment to do this early on?  
17 A. I don't recall if I was aware that Tom did that. I may  
18 have been. I don't know if Kat told me that or not. But  
19 again, at that early point, sure.  
20 Q. Did you have any discussion later with Chief Turner about  
21 the TBI?  
22 A. The discussion as I remember it was Chief Turner had  
23 called me one afternoon and he was with a couple of other  
24 people with the department. I can't recall anybody else  
25 that was on the line at the time, but he wanted to know

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To: Dahl, Kat (USATNE)[KDahl@usa.doj.gov]  
From: Taylor, Wayne (USATNE)  
Sent: Thur 2/18/2021 9:13:29 PM  
Subject: Your complaint and your Superseding Indictment



Kat,

I understand from the Clerks' Office that your complaint from yesterday did not have a cover sheet and did not have an arrest warrant. Then, on your superseding indictment, it did not get entered because it was to be sealed, and there was no motion or order to seal provided. I know you have been busy this week with teaching and getting these two things ready, but please make sure that you have everything in your packets to go to the clerks office or to the grand jury. And that you have allocated a sufficient amount of time to make sure you get everything done that you need to. If you are not sure, please ask me or anyone else here. Typically, those supporting documents are what our support staff does for you. I don't know if Robyn is not doing them for you or not. But regardless, as the SAUSA on the case, it is your responsibility.

These issues seem to fit the recent trend of not responding quickly enough to Probation, completing trainings at the last moment and often getting documents to me for review very late in the game. I want your reputation and the reputation of this office to remain very high. I know there is a continued learning curve and that there is a lot to learn but if there is anything you would like to discuss with me, please feel free. As for now, if not done already, please make sure you rectify the issues on the complaint and superseding indictment. Thanks.

Wayne

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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 WAYNE TAYLOR 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 24th day of October, 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\*\*\*