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

KATERI LYNNE DAHL, Plaintiff,

*

VS.

CASE NO.

* 2:22-CV-00072-KAC-CRW

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

Defendants.

DEPOSITION OF

MICHAEL DENIS "PETE" PETERSON

(Taken November 15, 2023)

APPEARANCES:

COUNSEL FOR THE PLAINTIFF:

ALEXIS I. TAHINCI

TAHINCI LAW FIRM

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- 1 A. Not any closer than anybody else.
- 2 Q. Did Chief Karl Turner report directly to you?
- 3 A. Yes.

4

- Q. How often did you interact with JCPD leadership?
- 5 A. What do you mean by leadership?
- 6 Q. Well, let's just start with Mr. Turner, Chief Turner.
- 7 How often did you interact with Chief Turner in your
- 8 day-to-day work?
- 9 A. On an as-needed basis. We had one regularly scheduled meeting. Other than that, it was just on an as-needed
- 11 basis.
- 12 Q. One meaning a month, a week, what interval?
- 13 A. I believe they were every other week.
- 14 Q. And what did you discuss during those meetings?
- 15 A. General operations, anything that the city commission was
- 16 looking at doing, sharing of information about what other
- departments were doing, listening to any requests the
- 18 chief brought forward to me.
- Q. Did you know Kat Dahl at all during your tenure as city manager?
- 21 A. I saw and met her one time, and that was the night that 22 her contract was approved.
- Q. Okay. Would that have been at a commission meeting?
- 24 A. Yes.
- 25 Q. Okay. When did you first learn of her?

PETE PETERSON

DIRECT - TAHINCI

CERTIFICATE

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of MICHAEL DENIS "PETE" PETERSON 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 20th day of
November, 2023.

Rebecca Overbey

LICENSED COURT REPORTER

State of Tennessee

LCR #078

My License Expires:

June 30, 2024

CERTIFIED ONLY IF AFFIXED SEAL IS GREEN