

CAITLIN O'CONNOR

vs.

LAMPO GROUP

Confidential

MARK FLOYD

June 30, 2021



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1
2 IN THE UNITED STATES DISTRICT COURT FOR THE
3 MIDDLE DISTRICT OF TENNESSEE
4 NASHVILLE DIVISION

5 CAITLIN O'CONNOR,

6 Plaintiff,

7 vs.

Case No. 3:20-cv-00628

8 THE LAMPO GROUP, LLC
9 a/k/a RAMSEY SOLUTIONS,

10 Defendant.

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12
13 ***CONFIDENTIAL***
14 (UNTIL FURTHER DETERMINATION)

15 Video Deposition of:

16 MARK FLOYD

17 Taken on behalf of the Plaintiff
18 June 30, 2021

19 Commencing at 9:51 a.m.

20
21
22 Elite-Brentwood Reporting Services
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A P P E A R A N C E S

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S T I P U L A T I O N S

The Video Deposition of MARK FLOYD was taken by counsel for the Plaintiff, at Webb Sanders, PLLC, 611 Commerce Street, Suite 3102, on June 30, 2021, for all purposes under the Federal Rules of Civil Procedure.

All formalities as to caption, notice, statement of appearance, et cetera, are waived. All objections, except as to the form of the question, are reserved to the hearing, and that said deposition may be read and used in evidence in said cause of action in any trial thereon or any proceeding herein.

It is agreed that Terri Beckham, RMR, CRR, Notary Public and Licensed Court Reporter for the State of Tennessee, may swear the witness, and that the reading and signing of the completed deposition by the witness are reserved.

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* * *

1
2 THE VIDEOGRAPHER: We are now on the
3 record. Today is Wednesday, the 30th of June, 2021.
4 And the time indicated on the video screen is
5 9:51 a.m. This is the video deposition of Mark
6 Floyd taken in the matter of O'Connor versus The
7 Lampo Group, LLC, also known as Ramsey Solutions,
8 Case Number 3:20-cv-00628, filed in the United
9 States District Court for the Middle District of
10 Tennessee, Nashville Division.

11 This deposition is being held today at
12 Webb Sanders PLLC, located at 611 Commerce Street
13 Nashville, Tennessee.

14 My name is Mary Ciezadlo, the
15 videographer. The court reporter is Terri Beckham,
16 both in association with Elite-Brentwood Reporting
17 Services.

18 Will counsel please introduce yourselves
19 and state whom you represent.

20 MS. COLLINS: Heather Collins and Ashley
21 Walter for the plaintiff.

22 MS. SANDERS: Leslie Sanders for
23 defendant.

24
25 ///

MARK FLOYD,

was called as a witness, and after having been duly sworn, testified as follows:

EXAMINATION

QUESTIONS BY MS. COLLINS:

Q. Good morning. Could you state your full name for the record, please?

A. Sure. Mark Andrew Floyd.

Q. What is your address?

A. [REDACTED], as in songwriters, Brentwood, Tennessee 37027.

Q. What is your phone number?

A. [REDACTED].

Q. Is that your cell phone?

A. Yes.

Q. Is it a company-provided cell phone?

A. Yes.

Q. Where are you currently employed?

A. Ramsey Solutions, The Lampo Group.

Q. How long have you been employed there?

A. Oh, 12-plus years.

Q. What is your job title?

A. Chief financial officer.

Q. How long have you held that position?

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1 A. I came in as chief financial officer 12-plus
2 years ago.

3 Q. What did you do before you were CFO at Ramsey
4 Solutions?

5 A. I was the CFO at the Nashville Predators.

6 Q. How long were you there?

7 A. Technically a year-and-a-half.

8 Q. What are your job duties as CFO of Ramsey
9 Solutions?

10 A. I lead the accounting and finance area. I
11 lead procurement and purchasing, and I used to lead
12 HR. I'm looking at Armando over there.

13 And then I serve on the operating board and
14 lead a couple of operating committees of the board.
15 That's -- we structure ourselves that way.

16 Q. Okay. What did you do in HR?

17 A. I led -- I just had the HR leader report to
18 me. But that is now six months ago.

19 Q. Okay. So six months ago that was no longer
20 one of your job duties?

21 A. Right.

22 Q. So the entire time that you worked there,
23 you -- the HR manager reported to you until six
24 months ago; is that right?

25 A. Not the entire time. Over time the duties

1 have changed. But a couple, two or three years in
2 there -- no, probably four, five years had HR
3 reporting to me until six months ago.

4 Q. Okay. Do you have a background in human
5 resources?

6 A. I do not.

7 Q. Have you had any specific training in human
8 resources or discrimination laws?

9 A. I -- I have not.

10 MS. SANDERS: Heather, before you go on,
11 I don't want to interrupt your flow, but just as a
12 reminder, this deposition, we're placing the whole
13 thing confidential under the protective order until
14 it's over, until we've had a chance to review it,
15 okay?

16 BY MS. COLLINS:

17 Q. So, Mr. Floyd, you've had no specific
18 training in HR antidiscrimination laws, correct?

19 A. We have had a couple of trainings, but I
20 haven't gone formal because I didn't lead the HR
21 department. I led the person who led the HR
22 department.

23 Q. Well, what was the extent of your job duties
24 in leading the person who led the HR department?

25 A. Helping with staffing needs, retention, I'll

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1 call it more the basic operations, not the
2 day-to-day HR -- HR responsibilities.

3 Q. Did you have any role in enforcing or setting
4 policy?

5 A. Can you be more specific about "policy"?

6 Q. Discrimination policy.

7 A. In my -- not as in my role as leading the HR
8 department, no.

9 Q. Do you have knowledge of Ramsey's policies,
10 like employment policies and procedures --

11 A. Yes.

12 Q. -- and how they're to be enforced?

13 A. Yes.

14 Q. Okay. Who decides how Ramsey's policies and
15 procedures are to be enforced?

16 A. Well, ultimately the operating board would
17 make that decision, but we do put the power into the
18 leaders to, you know, play out those policies to --
19 every decision does not have to come to the
20 operating board. We make overall policy and then
21 it's carried out by leaders.

22 Q. Okay. Who do you, as CFO, take direction
23 from or report to?

24 A. The CEO.

25 Q. And who's that?

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1 A. Dave Ramsey.

2 Q. When the HR leader reported to you, did you
3 provide any sort of regular reports to Dave Ramsey
4 about the HR functions or what was going on in the
5 HR department?

6 A. On periodic occasion.

7 Q. What do you mean by that?

8 A. There was no set schedule for those updates,
9 just when -- as needed.

10 Q. Have you ever been on the HRC committee?

11 A. Yes.

12 Q. Okay. When?

13 A. For the last three years.

14 Q. Okay. Are you still on it?

15 A. I am.

16 Q. What is your role on the HRC committee?

17 A. Committee member.

18 Q. What do you do as a committee member?

19 A. I sit in committee meetings and, as the
20 agenda rolls through, help make decisions, approve
21 expenditures if there are those types of things
22 coming through, or approve performance improvement
23 plans. It's just whatever comes through the HR
24 committee.

25 Q. Okay. Are you involved in any hiring or

1 firing decisions?

2 A. Yes.

3 Q. Okay. Tell me the extent of that
4 involvement.

5 A. Which one?

6 Q. Either. Both.

7 A. Hiring would be more specific to areas that I
8 directly -- or roles that I either lead or are one
9 step removed from me. I'm not involved in hiring
10 decisions for the -- all of our new team members.

11 Q. And tell me about your involvement in firing
12 decisions.

13 A. If they are directly related to me, I would
14 be directly involved. If -- if they come to the
15 HRC, then I would be involved from an HRC member.

16 Q. Okay. When you say you were -- you may be
17 directly involved as an HRC member, explain that to
18 me. How would you be involved? Is there a vote to
19 decide if somebody's going to be terminated or what?

20 A. Restate -- state your question again. I'm
21 trying to follow.

22 Q. Well, I'm trying to understand your
23 involvement. You said you were involved as an HRC
24 member in terminations. What is the extent of your
25 involvement? Is it just voting as a member of the

1 HRC or what?

2 A. We are a committee, so we have discussion,
3 and then we eventually have a decision. And
4 generally we reach -- if a vote's needed, but most
5 the time we're pretty much in one accord on most
6 things.

7 Q. Okay. Do you consider yourself a Christian?

8 A. Yes.

9 Q. Do you go to a specific denomination church?

10 A. It's actually a non-denominational church.

11 Q. Which one?

12 A. Fellowship Bible Brentwood.

13 Q. Have you ever been divorced?

14 A. No.

15 Q. Did you say no?

16 A. No.

17 MS. SANDERS: Objection.

18 THE WITNESS: Okay.

19 MS. SANDERS: You already answered.

20 That's fine.

21 BY MS. COLLINS:

22 Q. Have you ever had an extramarital affair?

23 MS. SANDERS: Objection. I'm not going
24 to let him answer that.

25 MS. COLLINS: Why not?

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1 MS. SANDERS: Because you're asking
2 personal things that could be incriminating to him
3 in this case. I don't know if they are, but they
4 could be.

5 MS. COLLINS: Incriminating?

6 MS. SANDERS: Yes. That's not on topic.

7 MS. COLLINS: That's not a basis for an
8 objection.

9 MS. SANDERS: It is. You know the rules
10 of this company. I don't know what his answer is
11 going to be to that. It could lead to something
12 that could result in his termination of employment.

13 BY MS. COLLINS:

14 Q. Are you refusing to answer the question?

15 MS. SANDERS: I'm telling him. I'm not
16 going to put him in the position to refuse.

17 MS. COLLINS: So does the company turn a
18 blind eye to certain people and just not ask about
19 other people? Is that what you're saying?

20 MS. SANDERS: They don't ask anybody.

21 MS. COLLINS: Okay, then I can ask the
22 question in a deposition.

23 MS. SANDERS: No, because the answer --
24 you have the director of HR, you have the general
25 counsel for the company. I don't know what his

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1 response is going to be.

2 MS. COLLINS: Okay. You're not
3 asserting a valid objection under the Federal Rules
4 of Evidence.

5 MS. SANDERS: I am. It's incrimination.
6 That is a valid objection.

7 MS. COLLINS: Incrimination in what
8 sense? It's not going to lead to -- you're not
9 asserting a Fifth Amendment right.

10 MS. SANDERS: Yes, I am. It could lead
11 to his termination from his employment.

12 MS. COLLINS: This isn't a criminal
13 case. You can only assert a Fifth Amendment right
14 in a criminal case. This isn't a criminal case.

15 MS. SANDERS: It's an incriminating
16 question. You can ask it, and I will ask them to
17 leave the room, and it will be under seal. That's
18 how we have to proceed with that. Because what
19 you're asking him, Heather, could lead to the
20 termination of his employment.

21 MS. COLLINS: The company seems to have
22 no problem getting in other people's business in an
23 extreme way, so, you know, I think it's really
24 hypocritical to sit here and say that an officer of
25 the company can't talk about something.

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1 MS. SANDERS: I understand your personal
2 view on it --

3 MS. COLLINS: It's not my personal view,
4 it's a legal view. The case is about the issue of
5 premarital or extramarital sex where a company feels
6 like they can get in someone's business and
7 terminate someone because of that.

8 MS. SANDERS: And you can ask any
9 question --

10 MS. COLLINS: And you can't selectively
11 say, "Oh, we're not going to -- we're going to turn
12 a blind eye to these people and not to these
13 people."

14 MS. SANDERS: You can ask any questions
15 you want about people who have been terminated.
16 We've said that. And about people that the company
17 knows about. I don't know what Mr. Floyd's answer
18 to this question is. But I don't think he should be
19 in a position to provide information today that
20 could lead to the termination of his employment.

21 If it's something Ramsey doesn't know,
22 how is it relevant?

23 MS. COLLINS: Relevancy is not the issue
24 right now. I can ask him whatever questions I want
25 to ask him within the scope of this case.

Confidential

1 MS. SANDERS: How does any affair he --

2 BY MS. COLLINS:

3 Q. Do you want to answer the question or not?

4 MS. SANDERS: I'm instructing him not to
5 answer at all.

6 MS. COLLINS: So you're continuing to
7 obstruct the deposition.

8 MS. SANDERS: No, I'm not.

9 MS. COLLINS: Yes, you are.

10 MS. SANDERS: No, I'm not. I'm simply
11 stating --

12 MS. COLLINS: Yes, you are, with no
13 legal basis whatsoever.

14 MS. SANDERS: That is a basis. There
15 are bases to objections. It is not relevant because
16 Ramsey -- you don't know if Ramsey knows that he's
17 having an affair or not having an affair. You don't
18 know that. If it's not knowledge to Ramsey, his
19 answer is not relevant and it has a high likelihood
20 of -- whatever his answer may be, it has a
21 likelihood of prejudicing him in a way that is not
22 necessary. It's not even relevant to your case.
23 What's relevant is what Ramsey knows.

24 So you digging into his personal life is
25 not relevant in this case. And I gave you

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1 parameters on which I'll allow it, but I can't allow
2 anyone at Ramsey --

3 MS. COLLINS: Okay. You don't set the
4 parameters for this case. The Federal Rules of
5 Civil Procedure do.

6 MS. SANDERS: Yes. And there's a way
7 for you to --

8 MS. COLLINS: And so do the Federal
9 Rules of Evidence.

10 MS. SANDERS: And I'm following the
11 Federal Rules of Civil Procedure and the Federal
12 Rules of Evidence. I'm providing you a valid
13 objection in discovery, which is relevancy that
14 leads to embarrassment, and I would file for a
15 motion for a protective order on this question.

16 MS. COLLINS: Embarrassment is not a
17 basis. Show me the rules.

18 MS. SANDERS: Yes, it is.

19 MS. COLLINS: Show me the rule.

20 Show me the rule. Show me the rule.

21 MS. SANDERS: Can we stop the deposition
22 and I'll go get the rule book right now?

23 MS. COLLINS: Sure, show me.

24 MS. SANDERS: And we'll go back on
25 record when I'm back.

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1 THE VIDEOGRAPHER: Going off the record
2 at 10:07 a.m.

3 (Recess observed from 10:07 a.m. to
4 10:09 a.m.)

5 THE VIDEOGRAPHER: We are back on the
6 record at 10:09 a.m.

7 MS. SANDERS: Thank you. Ms. Collins, I
8 direct your attention to Federal Rule of Civil
9 Procedural Rule 26c1. And I'll read it. "A party
10 or any persons from whom discovery is sought may
11 move for a protective order in the court where the
12 action is pending or, as an alternative, on matters
13 relating to deposition in the court or district
14 where the deposition may be taken. The motion must
15 include certification that the movement has, in good
16 faith, conferred or attempted to confer with other
17 affected parties in an effort to resolve the dispute
18 without court action. The Court may, for good
19 cause, issue an order to protect a party or person
20 from annoyance, embarrassment, oppression or undue
21 burden or expense."

22 And then I can read the rest if you
23 prefer, but that's the section I'm referring to.

24 So I would move for a protective order
25 unless we're able to come up with a conclusion

1 today, that any of these witnesses, when you ask
2 them things that are embarrassing and that are not
3 knowledge of Ramsey, that could lead to the
4 termination of their employment, I will move for a
5 protective order for that.

6 MS. COLLINS: Well, first off, he hasn't
7 said that Ramsey knows.

8 MS. SANDERS: No.

9 MS. COLLINS: Because you've instructed
10 him not to answer altogether.

11 MS. SANDERS: Well, I instructed him not
12 to answer your question.

13 MS. COLLINS: Secondly, if he's making
14 HRC decisions, then it is relevant. And I think
15 that I've established that foundation. I've set the
16 foundation.

17 Thirdly, we already apparently have a
18 protective order in his case. You've asked for
19 basically everything under the sun to be sealed up
20 to keep it out of the public record. So I believe I
21 can ask this question.

22 Now, if you want to preserve your
23 objection and ask the two people that you think
24 might fire him if he answers in a way that you're
25 concerned about to leave the room, then that's fine.

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1 But I feel like I'm entitled to ask the question
2 since the entire issue in the case is what -- when
3 Ramsey asks people about whether or not they've
4 engaged in premarital or extramarital sex and if
5 they terminate them.

6 MS. SANDERS: Ms. Collins, are you
7 agreeing this portion of the deposition will be
8 under seal until the court is able to rule on this?

9 MS. COLLINS: That's fine with me.

10 MS. SANDERS: Okay. That's all I'm
11 asking.

12 MS. COLLINS: That's fine with me.

13 MS. SANDERS: If you two will leave the
14 room, he can answer the question, and then I'll tell
15 you when it's time to come back in. Thank you.

16 (Mr. Cortez and Mr. Lopez left the
17 room.)

18 MS. COLLINS: Terri, can you reread the
19 question? I know you're going to have to scroll
20 back.

21 (The requested record was read back by
22 the court reporter.)

23 THE WITNESS: The answer is no.

24 BY MS. COLLINS:

25 Q. Okay.

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1 MS. COLLINS: All right.

2 MS. SANDERS: Is that the only one?

3 MS. COLLINS: Everybody ready?

4 MS. SANDERS: For the record, Mr. Lopez
5 and Mr. Cortez are back in the room.

6 MS. COLLINS: And we're not under seal
7 anymore.

8 MS. SANDERS: That's right.

9 BY MS. COLLINS:

10 Q. Mr. Floyd, as CFO, can you confirm that
11 Ramsey Solutions is not a 501c3 or charitable
12 organization?

13 A. I can confirm that, yes.

14 Q. And as the CFO, can you confirm that Ramsey
15 Solutions is not getting tax breaks for being a
16 school or educational institution?

17 A. Correct, I can confirm.

18 Q. Do you know if Ramsey Solutions received any
19 PPP loans?

20 A. I know that we didn't.

21 Q. Okay. Did they apply for any?

22 A. No.

23 Q. Okay. Have they received any state grants
24 for funds?

25 A. Yes.

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1 Q. For what?

2 A. The construction -- the buildings that we're
3 putting up in Berry Farms we applied for and
4 received grants from TVA and from the Tennessee
5 Economic Development Department for -- all related
6 to job creation.

7 Q. Okay. And TVA, are those federal funds?

8 A. I don't know.

9 Q. Okay. Have you ever been involved in any
10 spousal interviews in the hiring process?

11 A. Yes.

12 Q. Okay. A lot of them?

13 A. Can I say too many? No.

14 Q. Sure, you can say whatever you want to.

15 A. Not -- I don't know what you mean by "a lot."

16 Q. Okay. Well, you tell me. Is it 10 or less
17 or more than 10 or more than 50? Just a ballpark.

18 A. More than 10, less than 50.

19 Q. Okay. Is it just for people that are being
20 hired in your department, or what is your
21 involvement?

22 A. I would either be the leader or the next
23 level leader, and that's the spousals I've been
24 involved in.

25 Q. Okay. Who typically attends those spousal

1 interviews?

2 A. Candidate and spouse, immediate leader and
3 spouse, and then likely next level leader and
4 spouse.

5 Q. Are they typically at someone's home or do
6 you all go out to eat?

7 A. At a restaurant.

8 Q. Oh, okay. Do you have a favorite restaurant
9 you go to, or is it not your choice?

10 A. We give BrickTop's a lot of business.

11 Q. I like BrickTop's too. Do you get the
12 vegetarian burger? That's one of my favorites of.

13 A. No.

14 Q. You haven't tried that?

15 A. No.

16 Q. Tastes like a real burger.

17 MS. SANDERS: You can vouch for that.

18 THE WITNESS: My wife would like to know
19 that.

20 BY MS. COLLINS:

21 Q. Yeah, tell her. It's delicious.

22 In these interviews, do you-all go by any
23 sort of -- you-all have, like, goals or objectives,
24 or is it just to get to know people?

25 A. Clarify "these interviews."

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1 Q. Those spousal interviews where you all go out
2 to eat.

3 A. Now that you've clarified that, ask your
4 question again, please.

5 Q. Is it -- do you-all have any objectives or
6 goals in the spousal interviews, things you want to
7 find out about?

8 A. Generally speaking, I'd say we want to get to
9 know the spouse and we want them to get to know us.

10 Q. Okay. Have you ever asked, in these
11 interviews, what religion or denomination someone
12 is?

13 A. I -- no. I'll clarify. If the subject of
14 church comes up and they talk about church, I would
15 ask, just like you asked me, "Oh, so where do you go
16 to church?"

17 Q. So you've asked that before in interviews,
18 "Where do you go to church?"

19 A. But only after it's come up.

20 Q. Have you ever hired anyone since you've been
21 at Ramsey Solutions that is not Christian, to your
22 knowledge?

23 A. To my knowledge, I don't know. Don't -- not
24 asking.

25 Q. Okay. Well, have you hired anyone who's

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1 Muslim?

2 A. I don't know. Not to my knowledge.

3 Q. Okay. What about someone who's Jewish?

4 A. I don't know. Not to my knowledge.

5 Q. Okay. Do you go to the Wednesday morning
6 devotionals?

7 A. Yes.

8 Q. What are those typically about?

9 A. Pardon?

10 Q. What are those typically about?

11 A. Depends who the speaker is. It can be
12 very -- is it a business speaker like Patrick
13 Lencioni. It could be on leadership. They could
14 also be very much based on the Bible, a section in
15 the Bible.

16 Q. About how long do they last, the devotionals?

17 A. 30 to 40 minutes generally.

18 Q. Do most of the employees go to those?

19 A. It appears, yes.

20 Q. Do you-all sing during the devotionals?

21 A. No.

22 Q. Do you listen to any sort of praise music?

23 A. No.

24 Q. And you-all have bands come in on occasion to
25 the devotionals?

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1 A. Not to devotionals. I'd say once in a --
2 "rarely" is a better answer.

3 Q. Have you had any specific training to be on a
4 hiring team or to be part of the spousal interviews?

5 A. Yes.

6 Q. Tell me about the training.

7 A. Well, which one do you want? You asked two
8 different questions there.

9 Q. Okay. Well, let's break it down.

10 A. Okay.

11 Q. Let's start with the spousal interview.

12 A. Yes, we -- training is probably a strong
13 word, but we -- actually, it's the right word,
14 because we have new leaders that need to know how to
15 do spousal interviews. You don't want to make the
16 spouse uncomfortable; you want to make them super
17 comfortable. So it's -- so I've been -- I've been a
18 part of training and I've probably done some of the
19 training myself, taking a new leader through the
20 process.

21 Q. Okay. What is the process?

22 A. I think I just told you, just you're making
23 sure you don't ask the wrong questions and you --
24 and you make sure that the candidate's comfortable
25 and the spouse is comfortable. You're just trying

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1 to get to know them.

2 Q. Do you fill out any sort of report after the
3 interview?

4 A. Not that I'm aware of.

5 Q. Okay. And the hiring team, what sort of
6 training do you have for the hiring team? Tell me
7 about that.

8 A. Be specific. When you say "hiring team,"
9 what do -- what do you mean?

10 Q. Well, I asked you a moment ago if you're
11 trained to be on the hiring team or if you receive
12 any training to do the spousal interviews. And you
13 said yes. And then you wanted me to break it
14 down --

15 A. Okay.

16 Q. -- so I'm breaking it down.

17 A. Probably using the phrase "hiring team" makes
18 it sound like there's a team running around doing
19 the hiring. Each leader is responsible -- or you
20 know, is ultimately responsible for hiring, not a
21 team of people. So that's -- that was my confusion
22 there.

23 Q. Okay.

24 A. So are people trained to be hiring people?

25 Yes.

Confidential

1 Q. Okay. Tell me about the training.

2 A. We learn what questions to ask and what
3 questions not to ask, because there are places you
4 can't go and...

5 Q. What are the places you can't go?

6 A. The same stuff that you asked earlier about,
7 what the federal hiring practices thing -- I won't
8 say that right, but...

9 Q. Such as?

10 A. You can't ask about religion, race. I don't
11 remember all the others.

12 Q. Okay. Anything else that you can recall?

13 A. No.

14 Q. Okay. You also mentioned what questions to
15 ask. What questions do you try to remember to ask?

16 A. I don't know that it's specifically talking
17 about questions to ask. It's more questions that
18 are going to open up dialogue and have conversation.
19 And, again, the basic premise is to get to know them
20 and ask them if they've got questions about us.

21 That's a question to ask is, "What do you want to
22 know about us?"

23 As a spouse, you ought to know.

24 Q. How many people do you directly supervise?

25 A. (Pause)

Confidential

1 Four.

2 Q. Who are they?

3 A. Daniel Cortez, general counsel; Jeff
4 Williams, executive director of finance; Joleen
5 Wadlington, director of procurement.

6 Q. One more.

7 A. Yeah. Oh, my admin assistant --

8 Q. Okay.

9 A. -- Shelby Davis.

10 Q. And based on your earlier testimony --

11 A. Oop, I've got somebody I left out. In case
12 they read the deposition, I don't want them to feel
13 bad. Thom Carlin, director of shipping.

14 Q. All right. And before that it was also the
15 HR director, right?

16 A. Right.

17 Q. Well, I guess before six months ago; is that
18 right? Is that what you said is about when it
19 changed?

20 A. Somewhere around six months ago, yeah.

21 Q. Okay. Have you seen a copy of Ramsey
22 Solutions' handbook or employee policies and
23 procedures?

24 A. Yes.

25 MS. COLLINS: Okay. I'm going to --

1 well, I'm going to provide you a copy of that. It's
2 been previously marked as Exhibit No. 1 in this
3 case.

4 (WHEREUPON, the above-mentioned
5 document was presented, previously marked as
6 Exhibit Number 1.)

7 BY MS. COLLINS:

8 Q. Here you go.

9 A. (Reviewing)

10 Q. Is this the handbook that you've seen before?

11 A. Yes.

12 Q. Okay. Now, with respect to the top section,
13 the "Equal Employment Opportunity" section, have you
14 read that before?

15 A. I've read all this before, yes.

16 Q. Okay. Do you have any understanding as to
17 whether or not pregnancy is also a prohibited form
18 of discrimination?

19 A. I am not aware that it's a protected class or
20 whatever you just -- a form of discrimination.

21 Q. Okay. And what about religion? What is your
22 understanding as to religion being a protected
23 class?

24 A. You can't discriminate based on religion.

25 Q. Is it your understanding that that's based on

1 federal and state law?

2 A. That is my understanding.

3 Q. Okay. And is it important for Ramsey
4 Solutions to be in compliance with federal and state
5 law?

6 A. I would say it's important.

7 Q. And it's important to not discriminate
8 against people, isn't it?

9 A. According -- if it's in accordance with the
10 law, then, yes, we should not discriminate.

11 Q. Now, if you could turn to page 4 for me,
12 please. In the "Company Conduct" section on page 4
13 it says, "The image of Ramsey Solutions is held out
14 to be Christian."

15 What is your understanding of that?

16 A. Exactly that. I mean...

17 Q. Well, how is that practically carried out or
18 applied?

19 A. We operate our company based on
20 Judeo-Christian principles.

21 Q. Okay. What do you mean by "Judeo-Christian
22 principles"?

23 A. Well, our mission statement is that we
24 provide biblically based education, and we use the
25 same biblically based traditions to help manage our

1 company.

2 Q. And are all the employees expected to abide
3 by those biblically based traditions?

4 A. They're expected to adhere to and live by our
5 core values.

6 Q. And the core values are biblically based?

7 A. I don't know that all core values are
8 biblically based. Some are for sure.

9 Others are just good business practice.

10 MS. COLLINS: Okay. Well, let me ask
11 you about that. I'm going to show you a copy of the
12 core values. This is Exhibit No. 2 in the case.

13 (WHEREUPON, the above-mentioned
14 document was presented, previously marked as
15 Exhibit Number 2.)

16 BY MS. COLLINS:

17 Q. Which ones would you say are biblically
18 based?

19 A. The core value entitled "Colossians 3:23" for
20 sure.

21 Q. That's an easy one.

22 A. Yeah.

23 Q. Give me a harder one.

24 A. Righteous living.

25 And maybe, in my personal opinion, we

1 don't -- by the way, this is all my personal
2 opinion because we haven't had that discussion,
3 other than clearly Colossians 3:23 is, because it
4 kind of states it in its title.

5 "Fear not," that's Mark Floyd's personal
6 opinion.

7 Q. Okay. Anything else that seems biblically
8 based?

9 A. Not off the top of my head.

10 Q. What is "Shoot Sacred Cows"? What does that
11 mean?

12 A. Well, if you look at the byline, "We
13 challenge traditions," would probably be the best
14 place to go. We don't just keep doing something for
15 the sake of doing something. "That's how we've
16 always done it" is not an acceptable answer. That's
17 not how you succeed in business. You need to take a
18 bigger look at things all the time.

19 Q. Okay. By challenging traditions, is that
20 just how business is typically run? Is that what
21 that means?

22 A. I don't know that I understand your question.

23 Q. Well, it says, in the "Shoot Sacred Cows, We
24 challenge traditions." Is that just how business is
25 typically run, you know, we -- what does that mean?

Confidential

1 A. In my opinion, it would be don't get stuck in
2 a rut and keep making the same decisions because
3 that's how you've always done it.

4 Q. Oh, okay.

5 You also mentioned righteous living and
6 "fear not" seem to be biblically based. Let's
7 start with "fear not." Why do you think that's
8 biblically based?

9 A. And I said that was my opinion, so that's --
10 that's never been discussed in the company. I've
11 never had a conversation around that. I just know
12 that, with my faith, I -- I don't -- don't fear man.
13 I don't -- I don't fear -- I fear a higher power.

14 Q. Okay. When you say you don't fear man, what
15 do you mean by that?

16 A. It's ultimately not where my -- where -- I'm
17 not worried about what man thinks, I worry about
18 what God thinks. Again, personal opinion.

19 Q. But you do believe in following manmade laws,
20 right?

21 A. Yes.

22 Q. Okay. All right. I've just got to be sure.
23 Just asking the question.

24 Okay. What is righteous living? What about
25 that is biblically based?

Confidential

1 A. Because it's based on character and integrity
2 and how you conduct yourself. And the Bible speaks
3 to that a lot. So that's how I would say -- that's
4 how I would tie that into a biblically based core
5 value.

6 Q. Do you think the Bible speaks to, I guess,
7 the requirement that people should not engage in
8 premarital sex or a prohibition against premarital
9 sex?

10 A. Ask that question again, please?

11 Q. Yeah, it's kind of confusing to even state
12 because it's, like, a double negative.

13 A. That's --

14 Q. Do you think the Bible contains something, a
15 verse, a story, do you think it speaks to the, I
16 guess, the thought or the theory that someone should
17 not engage in premarital sex?

18 A. Yes.

19 Q. Okay. Where? Do you have a story that
20 you're thinking of or do you have a verse that
21 you're thinking of? Or where in the Bible can you
22 think of that it states that?

23 A. I'm not a Bible scholar.

24 Q. Okay.

25 A. Okay?

Confidential

1 Q. Sure.

2 A. So --

3 Q. But you go to Fellowship Bible Church, and
4 I'm sure they talk about all that stuff.

5 A. They do. Do I retain it is a different
6 thing.

7 Q. I know. I hear you.

8 A. Just -- I don't have a specific verse or
9 story to point you towards other than you take the
10 Bible as a whole in context, and you gather from
11 that that -- of course, the word "righteous" is in
12 the Bible quite a bit, so that would be a tie to the
13 righteous living part of it.

14 And -- so, keep yourself pure, holy, all
15 those things -- I don't have a specific verse for
16 you, sorry.

17 Q. Okay. Was there a story about Jesus telling
18 people not to throw stones at other people? Do you
19 know that story?

20 A. I know -- I'm familiar with that story.

21 Q. What is your recollection of that story?

22 A. Don't be the -- let the first among you who
23 have not sinned cast the first stone.

24 Q. Okay. And that was Jesus --

25 A. Don't ask me what book of the Bible.

Confidential

1 Q. That was Jesus saying that, right?

2 A. I believe so, yes.

3 Q. In that story, was he talking about -- do you
4 remember who he was talking about?

5 A. I believe it was a woman.

6 Q. Do you remember if it was a married woman or
7 not a married woman?

8 A. I don't recall.

9 Q. Okay. Well, I'm going to try not to quiz you
10 anymore on the Bible, but I'm not going to make any
11 solid promises. Always learn a lot in depositions.

12 Do you have any understanding as to whether
13 or not Ramsey Solutions only hires Christians?

14 A. I don't know. We hire the best person for
15 the job, most qualified --

16 Q. Okay.

17 A. -- who aligns with our core values and is on
18 board with our mission.

19 Q. Okay. And that was the core values and
20 mission we just discussed on Exhibit 2, right?

21 A. We discussed the core values, and the mission
22 statement is on Exhibit 2 as well, yes.

23 Q. And do you-all provide that to prospective
24 people before you-all finalize the hiring of them?

25 A. It is my understanding that we cover those

1 things, yes.

2 Q. Okay. And going back to Exhibit No. 1, we
3 were talking about the "Company Conduct" section,
4 and it says, "Should a team member engage in
5 behavior not consistent with traditional Judeo
6 values or teaching, it would damage the image and
7 the value of our good will and our brand."

8 What is your understanding as to what that
9 means?

10 A. Specifically you're speaking of damaging the
11 image and the value?

12 Q. Uh-huh, yes.

13 A. So what that means?

14 Q. Yeah.

15 A. I believe the market views us as a -- again,
16 just like the first sentence says, a company that is
17 biblically based. And so if we contradict that in
18 our actions or our team members do, then that would
19 damage our brand and image.

20 Q. Okay. What market are you referring to?

21 A. The market that hands us dollars for our
22 products.

23 Q. Okay. Does part of that market include
24 public educational institutions?

25 A. Yes.

1 Q. Okay. And by "public educational
2 institutions," is that -- you-all sell products to
3 states, right? Is that right?

4 A. Not to states.

5 Q. Is it like the -- like departments of
6 education?

7 A. Let me help you with the -- we sell it to --

8 Q. Perfect.

9 A. -- school systems.

10 Q. Yes. Specific school systems. But do you
11 sell it by state or by county?

12 A. County, local, not state.

13 Q. Okay. Do you also provide that sort of
14 educational program to higher education, like
15 colleges, junior colleges that sort of thing?

16 A. We have a curriculum that we sell to higher
17 ed as well, yes.

18 Q. Okay. And that curriculum that you sell
19 to -- whether it's local school boards or higher
20 education, those educational programs are secular,
21 right?

22 A. We sell to both secular -- the particular
23 ones you're talking about feels like secular, yes.
24 We also sell to private middle schools and high
25 schools and colleges as well.

Confidential

1 Q. So there's two different educational programs
2 is what you're saying, one that is more secular and
3 one that is not?

4 A. We don't sell two different educational
5 programs. There are two different -- I'm separating
6 those two market segments.

7 Q. Okay. I guess what I'm trying to understand
8 is the ones that you sell for, like, private schools
9 or home schools, those have Bible verses and things
10 in them and relate back to Bible verses and the
11 mission that it's biblically based. And the ones
12 that you sell to public entities, they can't have
13 Bible verses in them, can they?

14 MS. SANDERS: Object, but you can
15 answer. Object to the form of that.

16 THE WITNESS: Okay. The product is
17 exactly the same.

18 BY MS. COLLINS:

19 Q. Okay.

20 A. It contains some Bible verses, some quotes
21 from Abraham Lincoln and Teddy Roosevelt. It's --
22 it contains a little bit of everything.

23 Q. Okay. Even the ones that you sell to public
24 institutions?

25 A. Right.

1 Q. Have you ever heard that the company conduct
2 code is flexibly applied?

3 It's flexible?

4 A. I've never heard that.

5 Q. Okay. What about the core values? Is that
6 applied in a flexible way?

7 A. Can you be more specific with your question?

8 Q. Sure. Does it depend on the people who
9 are -- seems like it could be subjectively applied.
10 Like, if you're looking at it, you might see it one
11 way; someone else is looking at it, they might see a
12 possible infraction a different way. Is that fair?

13 A. Well, we're all human, and we all have our
14 individual opinions that we bring in to, say, the HR
15 committee, so we're all going to view it through a
16 different lens. And then every circumstance is
17 different.

18 So, yes, we're flexible, but we do not apply
19 it differently to different levels of people or
20 race, religion, sex within the company. But we all
21 have different, you know, frames which we look
22 through things, right?

23 Q. Right, right. But the policies that we've
24 discussed, whether it's the company conduct that's
25 set forth in the policies and procedures or the core

Confidential

1 values, should apply across the board to every
2 single person in the company?

3 A. They are consistently applied.

4 Q. Okay. And the company stance against
5 premarital sex, that's not written down anywhere, is
6 it?

7 A. Not to my knowledge.

8 Q. Okay. Do you know why that is?

9 A. No.

10 Q. Did you know Caitlin O'Connor when she worked
11 at Ramsey Solutions?

12 A. A face maybe, but not Caitlin on an even
13 first-name basis, no.

14 MS. COLLINS: I'm going to jump to
15 another exhibit, a document that's been previously
16 marked as Exhibit No. 5 in this case.

17 (WHEREUPON, the above-mentioned
18 document was presented, previously marked as
19 Exhibit Number 5.)

20 MS. COLLINS: I'm sorry.

21 BY MS. COLLINS:

22 Q. There you go. If you can turn to page -- it
23 starts on the second page and goes to the third page
24 on the document, page 84, 85 is the Bates number.

25 A. Okay.

Confidential

1 Q. Do you recall receiving a copy of this email?

2 A. Not from Caitlin, but from Armando to the
3 HRC, yes.

4 Q. Okay.

5 A. Because you're -- you're taking it over to 85
6 and that's just Caitlin only, so I would have been
7 forwarded the email from Armando.

8 Q. Right. And it looks like the -- on page 84,
9 Mr. Lopez sent it to the HR committee, Dave Ramsey
10 and Michael Finney specifically, but you're -- are
11 you included on the HR committee group emails, or
12 were you as of June 18, 2020?

13 A. Yes, I would have been included in that,
14 whatever we call that group, address.

15 Q. Okay. Now, when you got a copy of this email
16 that Caitlin O'Connor had sent to Mr. Lopez, did you
17 speak with anyone about it?

18 A. No.

19 Q. Okay.

20 A. You said "speak," right?

21 Q. Uh-huh.

22 A. Okay, no.

23 Q. Did you speak with anyone in the following
24 days about it?

25 A. In the -- pardon, day or days?

Confidential

1 Q. In the following days, you know, let's go up
2 to a week, that you can recall?

3 A. I don't recall -- at some point, yes. I
4 don't know in the next week.

5 Q. Okay. And on the first page, the first
6 email, that looks like it's from you. It's at
7 5:17 p.m. on June 18, after Caitlin O'Connor had
8 sent the initial email that day at, like, 4:44.

9 You wrote back to the HR committee that it
10 was "Totally classless on her part."

11 What did you mean by that?

12 A. By "classless" I meant the fact that she
13 resigned via email and didn't go to her leader
14 directly. It had nothing to do with her
15 classless -- classless and pregnancy had nothing to
16 do with each other.

17 Q. Where do you get in her email that she
18 resigned?

19 A. I probably ought to say "notified" is
20 probably a better word than "resigned"; that she let
21 us know this rather large piece of news in an email
22 instead of sitting down with her leader. That's not
23 what -- how we do it at Ramsey.

24 Q. What do you base that on, that that's not how
25 you do it?

Confidential

1 A. We're a highly relational company, so we
2 expect leaders to have one-on-one conversations with
3 the team that they lead and the team itself to go to
4 the leader and have one-on-one conversations.

5 Q. Who was her leader?

6 A. I'm not exactly sure.

7 Q. Okay. Do you know if her leader was even in
8 the office that day?

9 A. I don't know that.

10 Q. So you think it was classless on her part to
11 have sent an email as opposed to talking with her
12 leader; is that what you're saying?

13 A. Yes. I'm sure her leader was in the office
14 at some time in that period. I don't want to just
15 leave it to this day at 4:44 p.m.

16 Q. And when you wrote, "And, yes, I agree
17 there's precedent, a/k/a principles and values for
18 how we handle this."

19 What did you mean by "principles and
20 values"?

21 A. Our core values.

22 Q. Which ones?

23 A. In this case it would be the righteous
24 living.

25 Q. Okay. What about the righteous living?

Confidential

1 A. What about it?

2 Q. Well --

3 A. I don't understand your question.

4 Q. Well, what about righteous living was
5 precedent?

6 A. Our precedent is that we had seen the
7 situation before and we -- and I knew the end --
8 where we would end up with this. It's consistent
9 with how we've applied righteous living core value
10 principle in the past.

11 Q. Okay. And when you say "this situation,"
12 what do you mean by that?

13 A. She had premarital sex, and that violates our
14 righteous living core value.

15 Q. And having premarital sex is -- I think we
16 already covered it's not written down anywhere,
17 right?

18 A. Not that I'm aware of.

19 Q. Okay. And what is your understanding as to
20 how employees are supposed to know that engaging in
21 premarital sex will cost them their job?

22 A. We -- they are talked -- it is discussed, if
23 they are a single team member when we're hiring
24 them, they know coming in that we expound upon what
25 righteous living means to us and needs to mean to

1 them.

2 Q. If it's that important and it could cost
3 someone their job, why don't you-all write it down
4 and have them sign it, sign some sort of pledge
5 saying they won't do that or they'll be terminated?

6 A. I don't know.

7 Q. Okay. So going back to the righteous living
8 clause it says that, "We believe character matters.
9 All the time."

10 And you said that's biblically based, right?

11 A. I believe that to be the case.

12 Q. And then an employee that engages in
13 premarital sex is, what, bad character? Is that
14 what that means?

15 A. I -- we haven't gone to that extent to define
16 it that -- to exactly say that's what that means,
17 bad character. I haven't heard that phrase. I just
18 know that we view it as and we've consistently
19 applied it as a violation of that core value.

20 Q. And you understand that not all people
21 believe in that, right, that believe that having
22 premarital sex is bad or something that should cost
23 them their job?

24 A. I understand that there are a lot of beliefs
25 out there, so I'm not surprised that they would

Confidential

1 maybe believe counter to what we believe.

2 Q. Have you ever worked for another company that
3 told its employees they cannot engage in premarital
4 sex because the company was biblically based?

5 A. I have worked for other companies, but I --
6 and I've never had that said to me.

7 Q. Have you ever worked for another company that
8 had a righteous living core value that was based on
9 the Bible?

10 A. No.

11 Q. I'm not sure the Predators didn't have
12 anything like that, did they?

13 A. Not that I'm aware of.

14 MS. COLLINS: Maybe I shouldn't be
15 making assumptions about hockey players.

16 Okay. Let's go off the record and take
17 a quick break.

18 MS. SANDERS: Sure.

19 THE VIDEOGRAPHER: Going off the record
20 at 10:59 a.m.

21 (Recess observed from 10:59 a.m. to
22 11:12 a.m.)

23 THE VIDEOGRAPHER: We are back on the
24 record at 11:12 a.m.

25 ///

1 BY MS. COLLINS:

2 Q. Okay, Mr. Floyd. We were discussing
3 Exhibit No. 5 and your response to Caitlin
4 O'Connor's email that -- requesting information
5 about FMLA and notifying the company she was
6 pregnant. And you responded at 5:17 to Armando's
7 email where he forwarded that.

8 Would you say at that time, on June 18,
9 2020, at 5:17 p.m., that that was basically you
10 saying "Time for her to go," or you agreed with
11 letting her go?

12 A. I would say that, unless there was something
13 that I didn't know, that we would be consistently
14 applying our decisions that we've made in other
15 instances to this instance here.

16 Q. Okay. And you say, "What Jen said," and Jen
17 Sievertsen says, "We've dealt with this before and I
18 think we should handle it exactly the same way."

19 What was your understanding as to what that
20 meant, handle it exactly the same way?

21 A. Can you tell me where Jen's --

22 Q. Oh, sure. It's on the next page, on 84, at
23 the top of the page, is her response.

24 A. Oh, there's Jen. Okay. Sorry.

25 Okay. Can you ask your question again?

Confidential

1 Sorry. I was -- I was trying to find Jen. I've
2 got it now, but what was your question?

3 MS. COLLINS: What was my question,
4 Terri?

5 (The requested record was read back by
6 the court reporter.)

7 THE WITNESS: I can't read any more into
8 it than handle it exactly the same way, and that
9 it's -- if the facts are what we think they are,
10 when we go further into it, it will lead to a
11 dismissal or termination.

12 BY MS. COLLINS:

13 Q. Okay.

14 A. With lots of grace and lots of generosity.

15 Q. And you said a minute ago that you felt like
16 your comment that it was totally classless on her
17 part to not talk with her leader before she sent
18 this email; is that right? Did I get that right?

19 A. That the notification should not come via
20 email, it should have come via a one-on-one
21 conversation.

22 Q. Okay. And in Caitlin O'Connor's email,
23 she -- she states, "This is obviously uncharted
24 territory for me, so I'm not sure what my next steps
25 are regarding sharing the news with my leader,

Confidential

1 getting FMLA and ADA paperwork in case it's needed
2 in the future, et cetera."

3 So could that be her just asking for advice
4 from Mr. Lopez, the HR doctor, about how to go
5 about handling that with her leader?

6 A. You ask "could be." Could be anything, yeah,
7 it could be.

8 Q. Well, should employees be able to go to HR
9 and ask questions like that, like, "How I do handle
10 this? What's the best way to handle this?"

11 A. They should be able to go to HR and ask
12 questions, yes.

13 Q. Okay.

14 A. I don't believe it was just about FMLA and
15 ADA was the reason for the email in the first place.
16 It was more about the notification.

17 Q. Notification of what?

18 A. To say "I'm pregnant."

19 If it would have been an only FMLA and ADA
20 question, then HR would make a ton of sense. I
21 think there was more in this than that.

22 Q. Okay. And so when you said it was totally
23 classless on her part, you felt like it was
24 classless of her to ask HR how to handle the
25 situation for guidance?

Confidential

1 A. No. The "classless," again, had nothing to
2 do with -- had nothing to do with her being
3 pregnant, had nothing to do with guidance on FMLA or
4 ADA or whatever those things were or weren't. It
5 was more about the first-time notification to our
6 organization that "I'm pregnant" was not sitting
7 down with the leader and say, "Here's what's going
8 on" because she knew that was in violation of our
9 core values.

10 Q. But isn't she asking how to share the news
11 with her leader?

12 A. I don't know if that's what she's asking or
13 not.

14 Q. Okay. Well, she specifically states that,
15 "I'm not sure what my next steps are regarding
16 sharing the news with my leader."

17 Do you think that's fair to accuse someone
18 of being classless for seeking advice from HR?

19 A. Again, I think I've asked -- I've answered
20 the question, that "classless" has nothing to do
21 with her reaching out to HR. My comment was because
22 she did not sit down and talk to her leader first,
23 because she knew she was in violation of our core
24 values. That's the ultimate thing.

25 Q. Well, she doesn't say that she knows that

Confidential

1 that's a violation of the core values, does she?

2 A. She does not say.

3 Q. Okay.

4 A. She knows.

5 Q. If you went and sought advice from HR, would
6 you appreciate being called classless?

7 A. I've been called worse.

8 Q. Yeah, me too.

9 All right. Are employees at Ramsey
10 Solutions expected to share medical information
11 with their leaders?

12 A. Expected to? I don't know. They tend to,
13 yes, because I said earlier we're highly relational
14 and our leaders care about our team and our team
15 cares about -- our leaders care about our team and
16 our teams want their leaders involved, if they do
17 want their leaders involved. If it was highly
18 confidential and they wanted to go straight to HR,
19 they could.

20 Q. Okay. So in Caitlin O'Connor's email
21 where -- I mean, she writes that it's confidential
22 or sensitive information, doesn't she? The top of
23 the email, the subject line says, "Sensitive
24 information"?

25 So if your position is that an employee can

Confidential

1 go to HR to share medical information, and
2 pregnancy's a medical condition, right?

3 A. Yes. I think.

4 Q. Wouldn't that --

5 A. I'm not a doctor.

6 Q. Wouldn't that -- wouldn't that be okay for an
7 employee to go to HR first and get advice about how
8 to share sensitive medical information?

9 A. It would be okay, yes.

10 Q. Okay.

11 A. It wasn't -- she wasn't stopped, right? She
12 did, so it would be okay.

13 Q. So I'm still just trying to understand, if --
14 if it's okay for an employee to go to HR first to
15 ask for direction how to share sensitive medical
16 information, why would that garner being called
17 classless?

18 A. I'll answer it again, because I believe there
19 was -- my belief is that there was more to that,
20 that she was going to HR and not to her leader
21 because she knew she'd violated our core values.

22 Q. So whether she went to HR or her leader,
23 what's the difference between the two? Does it
24 matter? I mean, she's going to someone in upper
25 management. What is the distinction between the

1 two?

2 A. My belief, my personal belief is that you
3 should speak to your leader --

4 Q. Okay. Is that written --

5 A. -- when you've violated a core value.

6 Q. Okay. Is that written in any policies,
7 procedures or rules of the company that you have to
8 go to your leader first?

9 A. I don't know of anything written.

10 Q. Okay. Is it an unwritten rule that you have
11 to go to your leader first or is it something that
12 you know that is regularly communicated to
13 employees, that you have to go to your leader first
14 before going to HR?

15 A. It is encouraged to speak with your leader
16 unless you have an issue with your leader themselves
17 and then you're encouraged to go find a different
18 leader or HR. But if it is not a situation with
19 your leader, that's what we strongly encourage, is
20 you sit down with your leader.

21 Q. Okay. But none of that that is written down,
22 that process?

23 A. Written, no. Spoken about, yes.

24 Q. Spoken about when and where?

25 A. In one-on-one -- we have one-on-one meetings

Confidential

1 every week, if you lead somebody and it's very
2 apparent that there's an open dialogue and there's
3 conversation and it's encouraged. So it's -- I'd
4 call it a common practice.

5 Q. And you don't see any distinction in the fact
6 an employee might be sharing confidential medical
7 information?

8 A. I -- I see that distinction if that's what
9 it's solely about, yes, then I'm great with going to
10 HR.

11 Q. But because this was a pregnancy that
12 involved premarital sex, you draw a different line
13 in the sand, right?

14 A. Yes. It was a violation of our core value.

15 Q. But she was being honest about it, right?

16 A. Yes.

17 Q. That's a good thing?

18 A. Yeah. We'll take that.

19 Q. To your knowledge, was this the first notice
20 of her pregnancy she had provided to the company?

21 A. To my knowledge, yes.

22 Q. Okay. And is being pregnant without having a
23 husband or being married considered a violation of
24 righteous living?

25 A. I wouldn't say the pregnant part is, but the

Confidential

1 act that got you there in the first place, which
2 would be premarital sex and sexual intercourse,
3 would be what would get you there.

4 Q. And did you assume, based on this email on
5 June 18, that she had engaged in premarital sex?

6 A. I did make that assumption.

7 Q. Okay. But she didn't say she engaged in
8 premarital sex, right? She just said she was
9 unmarried?

10 A. Correct.

11 Q. Wasn't Mary, Jesus's mother, unmarried when
12 she conceived with him?

13 A. Yes, she was.

14 Q. It's a good thing she didn't work for Ramsey
15 Solutions, huh?

16 MS. SANDERS: Objection.

17 THE WITNESS: Immaculate Conception.

18 BY MS. COLLINS:

19 Q. Well, nobody knew about that right off the
20 bat, did they?

21 MS. SANDERS: Objection.

22 THE WITNESS: I wasn't there.

23 BY MS. COLLINS:

24 Q. Have you been involved in the hiring of any
25 women at Ramsey Solutions?

1 A. Yes.

2 Q. Okay. I guess it goes without saying you
3 haven't hired any unmarried pregnant women, have
4 you?

5 A. No, not that I know of.

6 Q. Okay. If you did interview someone and you
7 found out they were pregnant and unmarried, would
8 you refuse to hire them?

9 A. I would, again, look at -- and say does that
10 violate our core value -- I mean, we're looking to
11 hire the person who's most qualified who fits our
12 core values and fits our mission. If I knew that,
13 then I would be able to make the decision that's
14 probably not the best, most qualified person for the
15 position.

16 Q. Based on the fact that they were unmarried
17 and pregnant?

18 A. (Pause)

19 Based on the fact that they didn't align
20 with our core value.

21 Q. And being unmarried and pregnant does not
22 align with the core values, right?

23 MS. SANDERS: That's fine.

24 THE WITNESS: If unmarried and pregnant
25 came about by premarital sex, then yes.

BY MS. COLLINS:

Q. Would you ask that in an interview, if someone had premarital sex?

A. No.

Q. Well, how would you figure that out? How would you know that?

A. They would have had to tell me.

Q. Volunteered, or would you ask questions to figure out?

A. They would have to volunteer. I can't ask that question. They would have to volunteer.

MS. COLLINS: I'm going to mark this next set of documents.

(WHEREUPON, the above-mentioned document was marked as Exhibit Number 14.)

THE WITNESS: Oh, I get the real sticker.

(Reviewing)

BY MS. COLLINS:

Q. Okay. I've handed you a set of documents that we've marked as Exhibit No. 14. And these are related to a former employee named [REDACTED]. Did you know [REDACTED] -- is it [REDACTED]? I'm probably mispronouncing it, if I had to guess.

A. I don't know how you pronounce it.

Q. Okay. We'll call him [REDACTED].

A. And I wouldn't say that I know him.

Q. Okay.

A. Yeah.

Q. Do you recall being involved in his termination at all?

A. I'm looking at the date, [REDACTED], and I don't know if I was on the HRC then or not, and so I honestly don't remember specifically [REDACTED] [REDACTED].

Q. Okay. All right. Well, let me -- I think I'm just going to pull you to the back couple of pages. If you could turn to page -- it will probably help just refresh your recollection. Turn to page 1333.

A. Okay.

Q. And then start there and read to page 1331. No, you gotta go backwards because the way emails do. So you start at 1333 and go to 1331. Read that to yourself and then when you're done I'm going to ask you just a couple of questions, and that will probably refresh your recollection.

A. (Reviewing)

MS. SANDERS: I'm sorry, what number did you say, Heather?

MS. COLLINS: 1333 to 1331.

THE WITNESS: (Reviewing)

BY MS. COLLINS:

Q. Okay. You ready?

A. Yeah, yeah.

Q. Okay. All right. I'm going to start with the email from Jack Galloway on [REDACTED], at 4:13 p.m. It starts on page 1332, it goes to 1333.

And he sent it to the operating board. Do you recall if you were on the operating board at that time?

A. Yes, I would be.

Q. Okay. What is the difference between the operating board and the HRC?

A. HRC is -- I'll call it a committee that deals specifically with HR-related things. The operating board helps run the operations of the entire company.

Q. Okay. Do you know why that discussions regarding this particular employee involved the operating board instead of the HRC?

A. I do not know.

Q. Okay. One of the things Jack Galloway says that [REDACTED] is very liberal -- well, he starts saying that two people have to come to him concerned that

[REDACTED] -- I guess that's [REDACTED] -- [REDACTED] and his fiancée are living together, and that he had met with [REDACTED] that day, along with Finney and Ebert in his office. And the short version was that [REDACTED] was nice, but guarded and hesitant to say anything other than they're living at the same address.

And then Mr. Galloway writes that, "[REDACTED] is very liberal in his beliefs and shared with us that his fiancée's pastor recommended that they live together prior to marriage. We had some short discussion about the difference and varying interpretations of right and wrong versus agreeing to work here and respect our core values."

And then it looks like Mr. Finney wrote back that it was the fiancée's pastor at a [REDACTED] [REDACTED]. Dave Ramsey wrote back, "Well, that makes it okay, then. Did you see the sarcastic font?"

And you wrote back, and this is on page 1331, that, "Dang, [REDACTED] preachers apparently are now going to Lutheran seminary."

What did you mean by that?

A. That's -- if you saw lots of emails, you'd see that Mark has a tendency to be a little bit of a

funny -- what I think is funny. Everybody else may not agree with it sometimes. Smart aleck, so...

Q. Okay. So did you mean that Lutherans are more liberal than Baptist preachers, as a general rule?

A. Since I'm the one that wrote it, then I can attest to that. I would say yes, on the spectrum of conservative to liberal, Baptist would definitely be over on the conservative side and Lutheran on the liberal side.

Q. Okay. So even if someone shares with you that they have a belief they're living with their fiancée and seeking guidance from their church about it, that doesn't matter, you still think they should be terminated from Ramsey Solutions?

A. Our core value is our company's belief, so it's not necessarily influenced by somebody else's beliefs sitting in [REDACTED]. We would consistently apply that, and that's what we did.

Q. Okay. Would you say that those core values are on the more conservative side of the spectrum, like you just described with the difference between Baptist and Lutheran?

A. We would lean conservative. That's how our interpretation of Judeo values would be.

Q. Is it your interpretation that Lutherans allow people to engage in premarital sex or live together?

A. First, it's not -- nobody from the company ever said anything about Lutheran, so this is just Mark. And I honestly was just having fun. I hadn't thought -- given two thoughts about what Lutherans believe and what they don't believe. I don't know what Lutherans believe and don't believe, so...

Q. But you do consider Lutherans a bit more liberal in their beliefs, right?

A. Yes.

Q. And in this instance it looks like [REDACTED] was just living with his fiancée, but I didn't read anything that said he confirmed they were engaging in premarital sex.

Is living together also prohibited, or is it just assumed that if you're living together you must be engaging in sex, having sex?

A. I don't read it in here either, so I don't know.

Q. Okay. Do you remember this guy, [REDACTED], being terminated?

A. Not until I read my [REDACTED] Baptist smart aleck answer. Then that rang a bell.

Confidential

1 Q. Okay. Now, I understand that the company --
2 the company's prohibition against premarital sex --
3 well, what do you consider the prohibition against
4 premarital or extramarital sex to be? What's your
5 understanding of that?

6 A. Sexual intercourse.

7 Q. Okay. What about oral sex? Is that
8 prohibited?

9 A. Sexual intercourse is where, to my knowledge,
10 and where I've drawn the line.

11 Q. Okay. So you would have not voted in favor
12 of impeaching Bill Clinton?

13 MS. SANDERS: Objection to form. I
14 don't think he had a vote on that, but he can answer
15 it.

16 THE WITNESS: I would have wanted him
17 impeached more from a political view standpoint,
18 so --

19 BY MS. COLLINS:

20 Q. But you agreed with Bill Clinton, though,
21 that intercourse -- that having sex is only
22 intercourse --

23 MS. SANDERS: Objection.

24 BY MS. COLLINS:

25 Q. Not oral sex, right?

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1 A. I don't even know how to answer that.

2 MS. SANDERS: That's fair.

3 BY MS. COLLINS:

4 Q. Is drunkenness considered a violation of
5 righteous living?

6 A. We haven't drawn the line at that like we
7 have the premarital sex. It would then come down to
8 is it at work. What's the pattern of conduct that
9 has occurred to get to the point where we're having
10 a discussion about someone's drunkenness?

11 Q. Okay. But Ramsey does host events at times
12 that serve alcohol, right?

13 A. Yes.

14 Q. With respect to your involvement in hiring
15 single employees, is the assumption made that
16 they're not engaging in premarital sex?

17 A. Ask the question again. Sorry.

18 Q. Sure. With respect to your involvement in
19 hiring single employees, is the typical assumption
20 made that they're not engaging in premarital sex?

21 A. Yes, because we're not inquiring if they are
22 or not.

23 Q. Okay. Have you ever heard employees referred
24 to as "thoroughbreds" at Ramsey Solutions?

25 A. Yes.

Confidential

1 Q. Okay. What is the context of that?

2 A. The context would be thoroughbreds are --
3 well, you have to take it in the context of
4 thoroughbreds versus donkeys.

5 Q. Okay.

6 A. Who would you want in a race? I'd take a
7 thoroughbred every day over a donkey. So it's not
8 like some type of thoroughbred is better than a
9 different type of thoroughbred, it's just in the
10 context of a comparison of a racehorse versus a
11 stubborn donkey.

12 Q. Okay. So are employees who are terminated
13 from Ramsey Solutions considered donkeys?

14 A. I don't -- I don't think so.

15 Q. Okay.

16 A. Never heard it referred to that way.

17 Q. Okay. Have you ever heard former employees
18 referred to as donkeys?

19 A. No.

20 Q. Where did you hear that -- or who did you
21 hear that from, this distinction between
22 thoroughbreds and donkeys?

23 A. I don't recall exactly who. It's said on
24 stage occasionally when we -- we want to -- we want
25 to make sure we hire thoroughbreds and we don't hire

1 donkeys. Again, in the context of -- not calling
2 anybody a donkey, but we want the best, the
3 brightest, the fastest, in a context.

4 Q. And people who engage in premarital sex are
5 not considered thoroughbreds, I suppose? Is that
6 right?

7 A. Never had -- never drawn that correlation, so
8 I can't answer that question.

9 Q. Well, I'm asking you to draw the correlation
10 now.

11 MS. SANDERS: Personally? His opinion?
12 Is that what you're asking, Heather?

13 BY MS. COLLINS:

14 Q. I'm asking you, is someone who engages in
15 premarital sex not a thoroughbred?

16 A. Okay. Since we've never had that discussion
17 as a company, Mark Floyd's opinion would be I don't
18 know that -- I don't think I'd consider them a
19 thoroughbred. Never thought of it before until you
20 posed that question right there.

21 Q. Have you ever heard former employees referred
22 to as stupid?

23 A. I don't recall a specific instance.

24 Q. Do you recall any conversations where
25 employees who disagreed with the policy that

Confidential

1 premarital sex was prohibited, that they were stupid
2 if they worked for that company and didn't believe
3 the same thing? Or something to that effect?

4 A. The "or something to that effect" is really
5 broad and vague. Can you --

6 Q. Sure.

7 A. -- just narrow it down to -- tell me what
8 you're asking.

9 Q. Have you ever heard someone at Ramsey
10 Solutions make the comment that an employee who
11 engages in premarital sex is stupid if they think
12 they should be allowed to work there and have that
13 belief?

14 A. I -- I don't recall anybody being called
15 stupid.

16 Q. Do you think people who have more liberal
17 views on Christianity are wrong?

18 A. Again, my personal view, I don't know that
19 they're wrong. It would depend. I need better -- I
20 need more context than that. I need to know what
21 specific things we're talking about. We may be far
22 apart on some things and some things we may be
23 really close. I have lots of good debates with good
24 friends all the time.

25 Q. Do you think that people who hold more

Confidential

1 liberal views about premarital sex should be
2 prohibited from working?

3 A. Working at Ramsey?

4 Q. I'm just talking in general right now.

5 A. Working? No.

6 Q. But they should be prohibited from working at
7 Ramsey?

8 A. Start over with the question, then. So --
9 are you asking Ramsey? Are you talking about
10 working in general, so --

11 Q. I'm talking two different things.

12 A. Okay. Then let's start over.

13 Q. So working in general, do you think people
14 who hold more liberal views on premarital sex should
15 be prohibited from working?

16 A. No, it's a free country. They should work.

17 Q. But you do think they should be prohibited
18 from working at Ramsey?

19 A. It is a violation of our core values, and
20 that's who we are, so they're not going to be the
21 best fit, they're not going to be in alignment with
22 our core values or on our mission.

23 Q. Now, can a company just make up a core value,
24 even if it violates federal law?

25 A. Not -- not to my knowledge.

Confidential

1 Q. Okay. Have you ever thought about that,
2 whether or not Ramsey's core values could violate
3 federal law?

4 A. Have I thought about it?

5 Q. Uh-huh.

6 A. I don't believe any of our core values do
7 violate, so I don't think I've put a lot of thought
8 into it.

9 Q. Do you think that eliminating discrimination
10 in the workplace is a good thing, that it's
11 important?

12 A. I don't believe in discrimination, so yes.

13 Q. Should a company be allowed to impose its
14 religious beliefs on its employees?

15 MS. SANDERS: Object to the form.

16 He can answer.

17 THE WITNESS: I don't think you should
18 be able to impose your religious beliefs. When
19 you're hiring -- you know what organization you're
20 stepping into, you know what -- if a core value is
21 based on a biblical view, then, again, it's the core
22 value, it's not the religious belief, it's our core
23 value.

24 BY MS. COLLINS:

25 Q. Do you think a company shouldn't impose its

Confidential

1 religious beliefs on its employees, even if it's
2 couched as a core value?

3 MS. SANDERS: Object to the form.

4 You can answer it.

5 THE WITNESS: When you object it throws
6 me.

7 MS. SANDERS: I'm sorry.

8 THE WITNESS: No, I understand why you
9 did it.

10 Can you ask the question again, then,
11 the exact same way.

12 MS. COLLINS: Terri, what did I say?

13 (The requested record was read back by
14 the court reporter.)

15 THE WITNESS: I don't think a company
16 should have -- be able to have a religious belief
17 couched in a core value that violates somebody's
18 religious beliefs.

19 MS. COLLINS: Okay. All right. Let's
20 go off the record. I just need to review my notes.

21 MS. SANDERS: Sure.

22 THE VIDEOGRAPHER: Going off the record
23 at 11:52 a.m.

24 Recess observed from 11:52 a.m. to
25 11:59 a.m.)

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1 THE VIDEOGRAPHER: We are back on the
2 record at 11:59 a.m.

3 BY MS. COLLINS:

4 Q. Mr. Floyd, do you know who ultimately decides
5 what is or is not a core living -- or righteous
6 living violation?

7 A. Generally speaking, it's the HR committee,
8 because that's where those violations come.

9 (Reporter asked for clarification.)

10 THE REPORTER: What was the last thing
11 you said? "That's where they come"...

12 THE WITNESS: That's where they come,
13 yeah.

14 BY MS. COLLINS:

15 Q. Do you know who decided about that difference
16 between oral sex and intercourse being a premarital
17 sex issue? Do you know where that came from?

18 A. I don't know the origins.

19 Q. How long have you known about that
20 distinction?

21 A. I'm trying to -- maybe a couple of years.

22 Q. What was the context where that was first
23 discussed or where you first, like -- seems like a
24 bit of a nuanced issue to grapple with.

25 A. Yeah. I'm -- I don't remember way back, so

1 I'm just going to my nearest memory. That would
2 have been an instance where -- did they have -- I
3 mean, if it's more about the did they have sexual
4 intercourse. It was less about oral sex, it was did
5 they have sexual intercourse. And that's where the
6 line then was -- not the line, but that's where that
7 distinction was, like, that's where we definitely
8 draw the line.

9 Q. Okay. Do you recall who that was?

10 A. I don't -- yeah, I -- I think it was in
11 the --

12 THE WITNESS: Can I answer that?

13 BY MS. COLLINS:

14 Q. You can -- yes, you answer it.

15 MS. SANDERS: Yeah.

16 (The following pages, 75 through 79, are
17 for attorneys' eyes only.)

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(Start of confidential portion.)

BY MS. COLLINS:

Q. You can't ask your attorney.

A. Okay. The most -- a time that I remember it is in the [REDACTED] instance.

Q. Okay.

MS. SANDERS: As we've already established, anything about [REDACTED] will be under seal.

BY MS. COLLINS:

Q. Okay. So the difference between whether oral sex was a righteous living violation for having premarital sex came up [REDACTED] when something came up with [REDACTED]? Is that the --

MS. SANDERS: Objection -- sorry.

BY MS. COLLINS:

Q. -- best of your recollection?

MS. SANDERS: Object to the form.

You can answer.

BY MS. COLLINS:

Q. Is that the best of your recollection?

A. That's the best of my recollection.

Q. So is this, like, a whole discussion with the HRC, or did you-all receive direction from someone else as to the distinction between the two?

Confidential

1 A. That was not at HRC level. That was at the
2 operating board level.

3 Q. Okay. So did the operating board have
4 discussions about the distinction between oral sex
5 and intercourse being a violation of the righteous
6 living premarital sex ban?

7 A. We had -- the distinction was drawn in that
8 operating -- in an operating board conversation,
9 yes.

10 Q. Okay. Was it a discussion with the full
11 operating board at the time?

12 A. I believe so.

13 Q. Okay. Do you know if any minutes were kept
14 from that meeting?

15 A. I -- we -- we aren't -- we don't do minutes
16 because it's not a board of directors type of
17 organization, how we -- we don't keep minutes,
18 per se.

19 Q. Okay. Does anyone typically take notes
20 during operating board meetings?

21 A. In our operating board meetings, when it is a
22 general business update, we have an executive
23 assistant in there taking notes. When we go to more
24 sensitive matters, we do not have anybody in there
25 taking notes.

Q. Who do you recall being in on that meeting?

A. Wow. The -- in the -- we're talking specifically about the [REDACTED] case, right?

Q. Yes, uh-huh.

A. I don't know that I can recall every name in there, but the general nature would be the full operating board.

Q. Who is that? Who do you recall?

A. Okay. Here we go. Myself -- I got to go around the room. Sorry. Jack Galloway, Jen Sievertsen, Suzanne Sims, Brian Williams, Jeremy Breland.

Two years ago...Daniel Tardy, Luke LeFevre, Jim King, Blake Thompson. This is when I feel bad when I can't remember who's on the board. Dave Ramsey, Daniel Ramsey, Rachel Cruze, Denise Whittemore, Winston Cruze. And I'm sure I've left one person out that I can't remember. I'd have to look over that list.

Q. Okay. So the operating board, not the HRC, dealt with the allegations that [REDACTED] had engaged in premarital sex?

A. Yes, the operating board, not HRC.

Q. Okay. Was that -- what you're referring to, I'd initially started off asking you questions about

who decided this distinction between intercourse versus oral sex, and the full operating board that you just described, was that [REDACTED] when that discussion was had, or was that more recently when [REDACTED] was terminated?

A. It was --

Q. Or both?

A. No. It would have been [REDACTED] -- yeah, over [REDACTED] ago.

Q. Okay. Were you involved in the more recent termination decision with respect to [REDACTED]?

A. Yes, because I'm on the operating board --

Q. Okay.

A. -- still.

Q. And why was he terminated recently?

A. Because we recently discovered that he was having premarital sex -- no -- yeah, he's divorced. So -- I'm sorry. I'm trying to think, was it extramarital or premarital. But he was having sex outside of marriage. How about that? And when that news came to light, he was terminated.

Q. Okay. And how did that news come to light?

A. Oh. I don't know if I remember exactly how it came to light. I know he was confronted and he admitted.

Confidential

1 Q. Who confronted him? Do you know?

2 A. It would have been a subset of that -- of
3 that operating board.

4 Q. What is it?

5 A. Well, in that case it probably would have
6 been the personnel -- Jeremy Breland probably.

7 Did I name Jeremy earlier?

8 MS. SANDERS: Yes.

9 THE WITNESS: He leads the personnel
10 committee, so that would be the right chain, if you
11 will.

12 (End of confidential portion.)

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1 (Continuation of regular,
2 non-confidential testimony:)

3 BY MS. COLLINS:

4 Q. Okay. If you ever have a righteous living
5 question, like, what all does that core value
6 encompass, who do you go to?

7 A. I don't -- I don't go to anybody. We let
8 those questions come in to HRC and make that
9 determination. We don't have a list.

10 Q. Okay. But as a leader of a team, if you had
11 a question about whether or not something impact --
12 or involved the righteous living core value, would
13 you still take that to the whole HRC committee or
14 would you just go to someone and ask, "Hey, what do
15 you think about this?"

16 A. If precedent has been set, there's no need to
17 ask the question or right -- right? I mean, we've
18 had precedent set before. But if there's a
19 question, I would take it to HRC.

20 Q. Do you know if Ramsey Solutions has any
21 atheists or agnostics working for it?

22 A. I have no idea.

23 Q. Do you think that would be consistent with
24 Ramsey Solutions' core values to hire an atheist or
25 agnostic?

Confidential

1 A. I have no idea. We haven't had that brought
2 up before.

3 Q. Sure. I'm asking your opinion.

4 Do you think it would be consistent with the
5 core values to hire an atheist or agnostic?

6 A. In my opinion -- I'm running through my
7 righteous -- I'm running through the core values.

8 Without more context I would say -- I would
9 want to ask questions and understand, are they in
10 alignment with our core values. Just you saying
11 that, I don't know whether they are or not.

12 Q. Is there any sort of set of guidelines for
13 the HRC to follow, that you-all follow, or is it
14 just based on established precedent that's
15 unwritten?

16 A. The latter.

17 Q. Okay. And I think I've already asked you
18 this. Is it your understanding that the core values
19 apply to every single employee at Ramsey Solutions?

20 A. Core values apply to everybody, yes.

21 Q. Okay.

22 A. I don't know that you've asked that exactly
23 like that.

24 Q. Okay. Have you ever had a situation that
25 you've been involved in with the HRC where the

Confidential

1 committee just disagreed about something?

2 A. It's a committee. So we would -- we've had
3 lots of -- we'll have spirited discussion.

4 Q. Well, what would you do if something like
5 that happened, if you needed a tie breaker?

6 A. If we needed a tie breaker and the -- again,
7 I can't remember exactly -- in the three to -- three
8 years plus that I've been on the HRC committee,
9 never had to have one. If we absolutely ended up
10 deadlocked or just -- even just in violent
11 disagreement, the nature of our organization is then
12 we would take that to the operating board to say,
13 "Here's something we can't resolve at the committee
14 level, let's resolve it at the operating board
15 level."

16 MS. COLLINS: Okay. All right. I think
17 that's all I have.

18 MS. SANDERS: Nothing from us.

19 Other than, Terri, when you prepare the
20 transcripts -- we don't have to do this on the
21 record, sorry.

22 THE VIDEOGRAPHER: The time is
23 12:14 p.m. We are going off the record. This will
24 conclude today's deposition.

25 THE REPORTER: Do you want to read and

1 sign?

2 MS. SANDERS: Yes.

3 THE REPORTER: And so you want copies?

4 MS. SANDERS: Yes.

5 (Proceedings adjourned at 12:15 p.m.)

6 FURTHER DEPONENT SAITH NOT.

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REPORTER'S CERTIFICATE

I certify that the witness in the foregoing deposition, MARK FLOYD, was by me duly sworn to testify in the within entitled cause; that the said deposition was taken at the time and place therein named; that the testimony of said witness was reported by me, a Shorthand Reporter and Notary Public of the State of Tennessee authorized to administer oaths and affirmations, and said testimony, pages 1 through 83, was thereafter transcribed to typewriting.

I further certify that I am not of counsel or attorney for either or any of the parties to said deposition, nor in any way interested in the outcome of the cause named in said deposition.

IN WITNESS WHEREOF, I have hereunto set my hand on July 15, 2021.



Terri Beckham, RPR, RMR, CRR, LCR No. 355
My commission expires: 3/6/2022

























