

**CAITLIN O'CONNOR**

**vs.**

**LAMPO GROUP**

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**Attorneys Eyes Only**

**JENNIFER LYNN SIEVERTSEN**

**July 20, 2021**



**Jerri L. Porter, RPR, CRR, CLR, LCR**

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

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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 ATTORNEYS' EYES ONLY\*\*\*  
14 (UNTIL FURTHER DETERMINATION)

15 Videoconference Deposition of:

16 JENNIFER LYNN SIEVERTSEN

17 Taken on behalf of the Plaintiff  
18 July 20, 2021

19 Commencing at 9:33 a.m. CST

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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 JENNIFER LYNN SIEVERTSEN was taken by counsel for the Plaintiff, by Notice, with all participants appearing at their respective locations, on July 20, 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 Jerri L. Porter, RPR, 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 is not waived.

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THE REPORTER: Good morning. My name is Jerri Porter. I am a Tennessee Licensed Reporter, LCR Number 335. Today's date is July 20, 2021, and the time is approximately 9:33 a.m. Central Standard Time.

This is the deposition of Jennifer Sievertsen, in the matter of O'Connor versus Lampo Group, LLC, Case Number 3:20-cv-00628, in the United States District Court for the Middle District of Tennessee, Nashville Division.

At this time, I will ask counsel to identify yourselves, state whom you represent, and agree on the record that there is no objection to Jerri Porter administering a binding oath to the witness via Zoom.

MS. COLLINS: Heather Collins and Ashley Walter for the plaintiff, and we also have a law clerk with our firm, Andrew Whitten, with us. And we have no objection to the administration of the oath via Zoom.

MS. SANDERS: Leslie Sanders, attorney for the defendant, and Daniel Cortez, attorney for the defendant, and we have no objection to the oath

1 being administered via Zoom.

2 \* \* \*

3 JENNIFER LYNN SIEVERTSEN,  
4

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

7

8 EXAMINATION

9 QUESTIONS BY MS. COLLINS:

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

12 A Sure. Jennifer Lynn Sievertsen.

13 Q And Ms. Sievertsen, what is your address?

14 A [REDACTED]  
15 [REDACTED].

16 Q What is your phone number?

17 A [REDACTED].

18 Q Is that a mobile phone or a landline?

19 A That's a mobile.

20 Q Is that a company provided cell phone?

21 A It is.

22 Q Okay. Where are you currently employed?

23 A I'm currently employed at Ramsey Solutions,  
24 also known as the Lampo Group.

25 Q Okay. What is your job title?

**Attorneys Eyes Only**

1 A Chief marketing officer.

2 Q Okay. How long have you held that job title?

3 A For 11 years.

4 Q How long have you been employed at Ramsey  
5 Solutions?

6 A It will be 12 years next month.

7 Q What position did you start off in?

8 A Executive director of web marketing.

9 Q Okay. Do you have any background in human  
10 resources or discrimination law?

11 A No.

12 Q Okay. What are your job duties as chief  
13 marketing officer?

14 A I lead the marketing function for the  
15 company, all of the marketing, the creative team,  
16 and the PR and publicity teams and our Ramsey  
17 concierge team. I also serve on our operating  
18 board.

19 Q Okay. Are you on the human resources  
20 committee?

21 A I am.

22 Q How long have you been on the human resources  
23 committee?

24 A Since 2012.

25 Q Okay. And how long have you been on the



1 operating board?

2 A Since 2012.

3 Q What is the difference between the two?

4 A The operating board helps to set the  
5 strategic direction for the company and helps to run  
6 the day-to-day operations of the company. And there  
7 are several committees that are subsets of the  
8 operating board, and one of them is the HR  
9 committee, and that specifically focus on HR issues.

10 Q Okay. Who is in charge or who leads the HRC?

11 A The HRC is chaired by Jack Galloway.

12 Q And when I say HRC, I'm referring to the  
13 human resources committee.

14 A Yes. That's what I assumed.

15 Q Okay. Now, in any of the roles that you  
16 perform, either on the operating board or the HRC or  
17 your role as chief marketing officer, are you  
18 responsible for enforcing policy of Ramsey  
19 Solutions?

20 A Sure.

21 Q What about setting policy? Does fall within  
22 your responsibilities?

23 A Sometimes. It depends on what it is.

24 Q In all three of those roles, either your role  
25 as chief marketing officer or your role on the HRC

Attorneys Eyes Only

1 or the operating board, no matter what, you have  
2 knowledge of all of the Ramsey policies, right?

3 A I have some knowledge of them, yeah, sure.

4 Q Okay. Who do you report to?

5 A To the CEO, Dave Ramsey.

6 Q Did you say -- to the CEO, who?

7 A Dave Ramsey, the CEO.

8 Q Okay. There's a little bit of delay between  
9 when you speak on the video and when your voice  
10 comes across.

11 A Oh, okay.

12 Q So that's a little bit of the trouble that  
13 we're experiencing.

14 Who reports to you in your role as the chief  
15 marketing officer?

16 A Okay. Hold on. I might have to make some  
17 notes so that I -- I will try not to miss anybody.  
18 Andy High reports to me, Kacy Maxwell, Katharine  
19 Cook, Courtney Kaehler, Megan McConnell, Melissa  
20 Wilhoite, Trey Sheneman.

21 Hold on. I'm just trying to make sure I  
22 haven't -- I think I'm missing somebody. Jacqueline  
23 Garneau.

24 MS. SANDERS: Jerri, while she's giving  
25 these, I'll provide you with spellings after the

**Attorneys Eyes Only**

1 deposition, okay?

2 THE REPORTER: Thank you so much.

3 THE WITNESS: I think that's it. I'm  
4 afraid I might be missing one or two.

5 BY MS. COLLINS:

6 Q Okay. In total, about how many report to  
7 you?

8 A About ten.

9 Q Okay. Are they all in the marketing or  
10 PR department?

11 A I'm sorry. Luke LeFevre also reports to me.  
12 They're marketing, creative, PR, Ramsey concierge,  
13 and -- yeah.

14 Q Okay. Have you ever had any training in  
15 Title VII?

16 A Generally, but not formally. Meaning  
17 generally as a leader, but not formally as an HR  
18 profession.

19 Q What is the extent of that general knowledge?

20 A The extent of the general knowledge is that  
21 you can't -- you can't discriminate against certain  
22 categories of people as part of their employment or  
23 hiring.

24 Q Okay. How often do you receive any sort of  
25 training as a leader in the -- in discrimination

1 policies?

2 A There's not a set time frame, but every  
3 few years.

4 Q When was the first time you received that  
5 general training in your role at Ramsey?

6 A Oh, I don't remember. I really don't  
7 remember the first time.

8 Q Was it shortly after you started there or has  
9 it been more recent than that?

10 A There's been more recent training since that,  
11 but I think you asked me the first time.

12 Q Yes, I did. What I'm trying to get at is,  
13 did you receive the training early on or has it been  
14 more recent that you received that sort of training?

15 A Oh. I don't remember early-on training, but  
16 I can't swear that early-on training didn't happen.  
17 I just don't remember.

18 Q Okay. About how long did the training last?

19 A I can remember a couple of different  
20 trainings over the last, I don't know, two to  
21 five years, and probably -- maybe it was an hour. I  
22 don't remember exactly.

23 Q Did you have to take any test or receive any  
24 sort of documentation during the training?

25 A I don't recall a test, no.

Attorneys Eyes Only

1 Q What about documentation?

2 A I don't remember. There could have been  
3 documentation. I just don't recall.

4 Q Okay. Are you involved in the hiring  
5 process?

6 A For certain positions I am.

7 Q For which positions?

8 A Positions that report directly to me and some  
9 other positions that fall within the area I lead.

10 Q Have you been involved in any spousal  
11 meetings before --

12 A Yes.

13 Q -- you recommended hiring?

14 Okay. Tell me about those spousal meetings.

15 A We typically will do a spousal interview near  
16 the end of the interview process if the person is  
17 married.

18 Q Why do you do that?

19 A So that the spouse has an opportunity to ask  
20 any questions that they might have about the  
21 organization or the role or their spouse's, you  
22 know, potential appointment with us.

23 Q Okay. And if someone is not married or if  
24 they have a significant other, are they invited to  
25 those couple meetings?

1 A Usually it's not a couple of meetings.  
2 Typically it's only one. If they're engaged, then,  
3 yes, but if they're not engaged, then probably not.  
4 I can't think of a time when there's been a  
5 significant other unless they've been engaged.

6 Q Okay. Have you ever asked someone on a  
7 pre-hiring interview if they've engaged in  
8 premarital sex?

9 A No.

10 Q Okay. Have you ever told anyone on a -- as  
11 part of an interview in a pre-hiring situation that  
12 the company has any sort of prohibition against  
13 premarital sex?

14 A I would talk about our core values as part of  
15 the interview process, and might refer to the fact  
16 that if I, as a team member here, had an affair,  
17 that I wouldn't be able to stay as a team member  
18 here. And that would be part of our core values.

19 Q Okay. But have you specifically addressed  
20 the issue of premarital sex or any prohibition  
21 against sex before marriage with someone that you're  
22 looking to hire?

23 A I would talk about it in the context of our  
24 righteous living core value. I'm sure I have. We  
25 regularly talk about what it means, what righteous

1 living means.

2 Q Okay. Now, there's no written policy that  
3 prohibits premarital sex, right?

4 A No, there's not a policy. There's just our  
5 core values.

6 Q There's no written communication or document  
7 that says an employee of Ramsey Solutions cannot  
8 engage in premarital sex, is there?

9 A There's just our core values where we talk  
10 about lots of things that would violate core values,  
11 including premarital sex.

12 Q Okay. But that -- those lots of things that  
13 you just referred to, they're not written down  
14 anywhere, right?

15 A Not that I'm aware of, no.

16 Q Okay. Well, give me some examples of other  
17 things that would violate righteous living, as you  
18 understand it, based on your experience working at  
19 Ramsey Solutions.

20 A Pornography would violate righteous living,  
21 having an addiction issue would violate righteous  
22 living. I'm sure there are other things. Those are  
23 the kinds of things I think of off the top of my  
24 head.

25 Q Okay. What type of addiction are you

1 referring to?

2 A There can be all kinds of addiction that  
3 violates righteous living. If you've got an  
4 addiction issue that's causing you to look at porn  
5 at work, that's going to violate righteous living.

6 Q Any other addictions that violate righteous  
7 living?

8 A Sure. Alcohol addiction or a drug addiction,  
9 those are going to be things that violate righteous  
10 living.

11 Q Okay. Have you ever hired anyone who has  
12 children out of wedlock?

13 A I don't know. I'm sure we have. Actually, I  
14 know we have. I can think of somebody, yeah. Two  
15 people.

16 Q Have you specifically recommended the hiring  
17 of someone with children out of wedlock?

18 A One of them that we hired on was on my team.  
19 I wasn't the hiring leader.

20 Q Okay. Who was it?

21 A Who was the person or who was the hiring  
22 leader?

23 Q Who was the person that you hired that had  
24 children out of wedlock?

25 A [REDACTED].



1 Q [REDACTED] what?

2 A [REDACTED].

3 Q Okay. Who was the other person? You said  
4 you could recall two people. Who was the other one?

5 A [REDACTED].

6 Q What department --

7 (Overlapping speech.)

8 A Just to be clear, they had children out of  
9 wedlock prior to starting here.

10 Q Okay.

11 A Just to clarify.

12 MS. SANDERS: I'm sorry, Heather. At  
13 the beginning of this, I should have designated this  
14 deposition as confidential, and now, getting into  
15 these matters reminds me.

16 So just to remind the witness and the  
17 court reporter, this deposition is designated  
18 confidential until we've had an opportunity to  
19 review and change those designations.

20 So just so you know, Jen.

21 BY MS. COLLINS:

22 Q Ms. Sievertsen, you mentioned that you wanted  
23 to make it clear that they had these children out of  
24 wedlock prior to starting. Why is that an important  
25 difference?

**Attorneys Eyes Only**

1 A Because if they had -- if they had sex  
2 outside of marriage while working here and we became  
3 aware of it, they wouldn't be able to continue  
4 working here.

5 Q And why is that?

6 A Because it violates our righteous living core  
7 value.

8 Q And has that come up since you've been  
9 working there, where y'all found out that someone  
10 had had sex outside of marriage?

11 A Yes.

12 Q Okay. How does that typically come up?

13 A Comes up various ways. I can't think of a  
14 typical way that it comes up. We aren't looking for  
15 it.

16 Q Okay.

17 A But if we find out about it, we act upon it.

18 Q Okay. Give me some examples, then, of how it  
19 has come up.

20 A Let's see. It's come up because somebody has  
21 chosen to move in with their boyfriend or  
22 girlfriend. It's come up because -- in Caitlin's  
23 case, like she came to us and let us know that she  
24 was pregnant and that she was engaged in a long-term  
25 relationship with the baby's father.

**Attorneys Eyes Only**

1           Yeah, those are two ways I can think of that  
2 has come up.

3           Q           Okay. All right. Let's start with the first  
4 one where someone has chosen to move in with their  
5 boyfriend or girlfriend and y'all found out about  
6 it. Can you recall a specific person where that's  
7 come up?

8           A           I feel like it's come up once or twice, but  
9 if you're asking me for the specific name of the  
10 person, I couldn't tell you off the top of my head.

11          Q           Okay. Did a third party tell you that they  
12 had moved in together or did the person just come  
13 and tell you? Do you recall how that came about?

14          A           No, I don't recall.

15          Q           Okay. And you mentioned Caitlin. You're  
16 referring to Caitlin O'Connor, right?

17          A           Yes.

18          Q           And she came and told you that she was  
19 pregnant and that she was in a long-term  
20 relationship with her -- with the baby's father,  
21 right?

22          A           Yes. She first told us she was pregnant.  
23 Then in a meeting with us told us that she was in a  
24 long-term relationship with the baby's father.

25          Q           Okay. So her notification to the company

1 that she was pregnant is what really put y'all on  
2 notice that she had engaged in premarital sex,  
3 right?

4 A On its face it seemed like it, but she  
5 confirmed that in a meeting.

6 Q Okay. Tell me about the meeting. Where was  
7 it and who was present?

8 A She met with me and Suzanne Simms, and we  
9 were in Suzanne's office.

10 Q Okay. What do you recall about that meeting?

11 A I don't recall a lot. I don't think it was a  
12 very long meeting. I remember just being concerned  
13 for Caitlin and wanting to see if she was okay.

14 You know, I remember talking with her and her  
15 talking about being pregnant and it had been so long  
16 since she had had her other children. I remember  
17 her talking about her other children that were, I  
18 don't know, 18, 19, 20, at the time. And, you know,  
19 just it physically being harder on her and her  
20 being -- you know, feeling that.

21 I remember her talking about being in a  
22 committed relationship with the baby's father, but  
23 obviously, you know, saying that she wasn't married  
24 to him and didn't know if they were going to get  
25 married at the time.

**Attorneys Eyes Only**

1           Yeah. I mean, that's really what I recall.

2       Q           Okay. Why did you and Suzanne Simms meet  
3       with her?

4       A           Just it's a pretty big deal here, and so we  
5       were meeting with her to check on her, see if there  
6       was anything that she wanted us to be aware of  
7       related to this. And of course it -- if it was as  
8       it seemed, to be a violation of our core values, you  
9       know, we were just making sure we had all of that  
10      information and to see if there was anything Caitlin  
11      needed, really.

12     Q           Okay. When you say that it was a pretty big  
13     deal here, what do you mean specifically, that it's  
14     a pretty big deal here? That an employee gets  
15     pregnant or that an employee gets pregnant outside  
16     of marriage?

17     A           No. Our employees get pregnant all the time.  
18     We have tons of team members that have babies while  
19     they work here.

20                But it's a pretty big deal to violate our  
21     righteous living core value. We're very clear in  
22     the hiring process about that and we're clear when  
23     people work here about that. So that's what I meant  
24     by it's a pretty big deal.

25     Q           Okay. If it's such a big deal, do y'all make

1 employees sign any sort of purity pledge if they're  
2 not married or anything that's in writing that  
3 notifies them that it's such a big deal to -- that  
4 they can't have sex outside of marriage?

5 A We do have an employee handbook that talks  
6 about our adherence to traditional Judeo-Christian  
7 values.

8 Q Okay. Anything else?

9 A Not that I can think of.

10 Q Okay. Well, what is -- where's the  
11 connection between prohibiting premarital sex in a  
12 traditional Judeo-Christian value? Where does that  
13 come from in the traditional Judeo-Christian values?

14 A From a biblical standpoint, sex outside of  
15 marriage in traditional Judeo-Christian values,  
16 those two things don't align. And we're very clear  
17 that we're biblically based in our values and in our  
18 mission.

19 Q Okay. And are you referring to the Christian  
20 Bible?

21 A Yes.

22 Q Okay. Where in the Bible does it say that?

23 A It says it multiple places, but I can't tell  
24 you off the top of my head exactly where.

25 Q Okay. Is it in connection with a story in

1 the Bible?

2 A It might be, but again, I can't tell you off  
3 the top of my head. If you're looking for books of  
4 the Bible and verses, I can't tell you off the top  
5 of my head where that is.

6 Q When did you first hear that premarital sex  
7 was prohibited at Ramsey Solutions because of its  
8 interpretation of traditional Judeo-Christian  
9 values?

10 A I first heard about it, I'm sure, during my  
11 interview process as part of talking about the core  
12 values of the company.

13 Q Do you remember who first told you about it?

14 A No.

15 Q All right. So you just don't know where in  
16 the Bible it comes from that this traditional  
17 Judeo-Christian value prohibits premarital sex?

18 A It's in multiple places, but if you're asking  
19 me for books and verses, no, off the top of my head  
20 I can't provide that to you.

21 Q Okay. Well, aren't there lots of things in  
22 the Bible that are prohibited?

23 A Sure.

24 Q Okay. Does Ramsey Solutions prohibit  
25 everything that the Bible prohibits?

1 A No. I think we've been pretty clear about  
2 how we -- how we look at that from our values  
3 standpoint.

4 Q Well, what is that? You said you were pretty  
5 clear about how we look at that from a value  
6 standpoint. What do you mean by that?

7 A I mean, like if you're talking about our  
8 righteous living core value, we've been very clear  
9 about what we believe that applies to.

10 Q Okay. So, what type of premarital sex is  
11 prohibited based on your knowledge as a member of  
12 the operating board and the HRC?

13 A Intercourse specifically.

14 Q What about oral sex?

15 A No.

16 Q Why is oral sex okay but intercourse is not?

17 A We've just drawn the line at intercourse.

18 Q Does the Bible draw the line between  
19 intercourse and oral sex?

20 A I don't know that it distinguishes.

21 Q Okay. How did that conversation come about,  
22 that oral sex was okay and intercourse was not?

23 A It's come up a couple of times in specific  
24 situations.

25 Q What specific situations?



1 A I can think of one where a team member -- two  
2 team members were engaged in relationship, but we  
3 drew the line that if they had not had intercourse,  
4 and they had not, that they -- as long as they did  
5 not continue that relationship, they were able to  
6 stay.

7 Q Okay. Who were the team members?

8 MS. SANDERS: That's okay, yes. It will  
9 be under seal.

10 THE WITNESS: [REDACTED] and [REDACTED]  
11 [REDACTED].

12 BY MS. COLLINS:

13 Q Okay. I heard [REDACTED]. Who was the  
14 other one?

15 A [REDACTED].

16 Q Okay. When was this?

17 A Oh, I don't -- it was several years back.  
18 Maybe four or five years ago. I don't remember  
19 exactly when.

20 Q Okay. What other specific situations? You  
21 said there were a couple.

22 A There was another situation --

23 THE WITNESS: Can I answer this?

24 MS. SANDERS: You can. This is under  
25 seal. It's going to be attorneys' eyes only, so

1 it's fine.

2 THE WITNESS: Okay. There was another  
3 situation with [REDACTED] where he had had a  
4 non-intercourse affair that we became aware of.

5 BY MS. COLLINS:

6 Q Okay. How did you know that it was a  
7 non-intercourse affair?

8 A Because that's what he and his wife at the  
9 time told us.

10 Q When you hire employees and you make it known  
11 that they can't engage in premarital sex if they're  
12 not married, do you also tell them that they can  
13 have oral sex but they can't have intercourse?

14 A No.

15 Q Do you get into that level of detail?

16 A No.

17 Q Why not?

18 A I don't know why not. Never occurred to me  
19 to talk about that level of detail in an interview.

20 Q Do you communicate to the -- do you know if  
21 it's communicated to the employees that the  
22 violation of righteous living that encompasses  
23 premarital sex only includes intercourse and not  
24 oral sex? Is that generally known or communicated  
25 to the employees?

Attorneys Eyes Only

1 A No.

2 Q Why not?

3 A I don't believe there's a reason to talk  
4 about that level of detail. The only time we've  
5 ever talked about it is when we've had to react to  
6 specific situations.

7 Q But it sounds like you call the people in and  
8 ask them if they've had sex, right?

9 A If we become aware of a relationship and  
10 we're trying to make a determination on whether or  
11 not they can stay employed, then yes. But do we  
12 regularly call employees in and talk about it, no.

13 Q And you don't communicate to them that oral  
14 sex is okay but intercourse is not?

15 A No. We just try to figure out whether or not  
16 they get to stay.

17 Q And whether or not they get to stay -- if a  
18 woman gets pregnant as a result of engaging in  
19 premarital intercourse, then she'll get terminated  
20 no matter what; is that correct?

21 A It's not a matter of whether or not she gets  
22 pregnant. It's a matter of whether or not she  
23 engaged in premarital sex.

24 Q Right. But if the prohibition is on  
25 premarital intercourse and a woman gets pregnant,

**Attorneys Eyes Only**

1 she would have had to have had premarital -- she  
2 would have had to have had intercourse, right?

3 A That's typically how that happens. I suppose  
4 it's not the only way, but it's the way it has  
5 happened, to the best of my knowledge, here.

6 Q Okay. And other women have been terminated  
7 for getting pregnant outside of marriage, right?

8 A For having -- not getting pregnant outside of  
9 marriage. For having had sex outside of marriage.  
10 They're not terminated because they're pregnant.  
11 They're terminated because they had sex outside of  
12 marriage.

13 Q But in the instances where the women were  
14 pregnant, the company found out about it because  
15 they notified y'all they were pregnant, correct?

16 A Yes.

17 Q Does Ramsey Solutions only hire Christians?

18 A Not that I'm aware of, no.

19 Q Do you know if any Jewish people work there,  
20 people that are of the Jewish faith?

21 A I don't know of any. That doesn't mean that  
22 there's not any.

23 Q Do you know if the company -- do you know of  
24 any Jehovah's Witnesses that work there?

25 A I don't know of any, but again, I'm not

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1 asking people that, so I don't know.

2 Q Do you know of any Muslims that work there?

3 A Again, I'm not asking them that, so I don't  
4 know. We make it very clear that we are a  
5 biblically based company as part of the hiring  
6 process.

7 Q What about Mormons? Do you know of any  
8 Mormons that work out there?

9 A I don't know of any.

10 Q When you say that you make it clear that  
11 you're a biblically based company, is that to  
12 discourage someone from another faith from working  
13 there?

14 A It's to make it clear that our mission  
15 statement and our core values are biblically based.

16 Q Okay. And the company has weekly devotional  
17 periods, right?

18 A Yes.

19 Q Are those mandatory?

20 A Yes.

21 Q And for those weekly devotionals, does that  
22 include biblical content?

23 A Sometimes it does.

24 Q Have you ever known an employee to refuse to  
25 attend the weekly devotionals?

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1 A No.

2 Q Can they, to your knowledge?

3 A It's not -- honestly, it's never come up.

4 Q Is that because you only hire Christians?

5 A No.

6 Q Is there any flexibility in the application  
7 of the righteous living policy?

8 A I'm not sure what you mean.

9 Q Sure. So, if a situation comes up and  
10 there's a concern that an employee violated the  
11 righteous living core value, is there a rigid  
12 application of that policy, like, well, if they've  
13 done this, then they're going to be terminated, or  
14 do y'all look at the specific facts and  
15 circumstances and then decide whether or not they  
16 need to be terminated?

17 A I'm not sure how to -- I feel like you're  
18 asking me something that I'm not sure how to answer.

19 I think we always look at the specific  
20 situation. And yet, if it's a situation that we've  
21 dealt with before, then we're going to handle it the  
22 same way when it comes up again. So I'm not sure  
23 exactly how to answer that question.

24 Q Okay. When was the first time that it came  
25 up that oral sex was okay but intercourse was not?

1 Was it with the [REDACTED] situation or was it with  
2 the [REDACTED] situation?

3 A I think -- I can't recall it coming up prior  
4 to the [REDACTED] situation. I can't swear it  
5 didn't come up prior to that, but I can't recall it  
6 coming up prior to that. We had had a discussion  
7 prior to that about intercourse specifically, but  
8 talking about oral sex, I can't recall it coming up  
9 prior to that.

10 Q Who was involved in that discussion where  
11 there was kind of a carve-out for oral sex?

12 A I don't recall. I don't recall it as a  
13 carve-out for oral sex. I recall it as we draw the  
14 line at intercourse.

15 Q Okay. Well, who was involved in the  
16 discussions?

17 A Around [REDACTED] specifically, that was the  
18 operating board.

19 Q Okay. Well, who suggested that oral sex was  
20 not a violation of that core value but intercourse  
21 was?

22 MS. SANDERS: Object to the form.  
23 You can answer.

24 THE WITNESS: I don't recall who brought  
25 that up. I recall a discussion of the operating

1 board where we reaffirmed something that I feel like  
2 has been in place for quite a while where we drew  
3 the line at intercourse.

4 But if you're asking me who in that  
5 discussion brought up that point, I don't know. I  
6 don't remember.

7 BY MS. COLLINS:

8 Q Okay. And the operating board meeting  
9 involving ██████████, who are you referring to  
10 specifically?

11 A I'm saying that that was the entire operating  
12 board that was at the time, that whoever was part of  
13 the operating board would have been part of that  
14 meeting.

15 Q Who do you recall was involved in that, on  
16 the operating board at that time?

17 A It would have been myself, Suzanne Simms,  
18 Jack Galloway, Mark Floyd, Denise Whittemore, Rachel  
19 Cruze, Winston Cruze, Daniel Ramsey, Dave Ramsey,  
20 Jeremy Brelund, Brian Williams, Michael Finney,  
21 Daniel Tardy, Brian Mayfield, Herb Jenkins. I think  
22 that's it, but I might be forgetting somebody.

23 Q Okay. Do you recall when this was?

24 A It was late in ██████, ██████████ ██████  
25 ██████. I don't remember the date.



1 Q Okay. Was anybody taking notes during this  
2 operating board meeting?

3 A I think I was, actually.

4 Q Okay. Were you taking them electronically or  
5 handwritten?

6 A Probably electronically.

7 Q Do you still have those notes?

8 A I'd have to look. I can't tell you off the  
9 top of my head.

10 Q Have you looked for them in connection with  
11 this litigation?

12 A No.

13 Q Did you circulate them after the meeting to  
14 the operating board?

15 A If I took notes, I probably circulated them  
16 to the operating board.

17 Q And by circulate them, would you have  
18 e-mailed them to the operating board?

19 A Yes. Again, I can't swear I took notes  
20 during that meeting, but I took notes during some of  
21 those meetings around there. And if I did, I would  
22 have circulated them.

23 Q Okay. But sitting here today, you think you  
24 did take electronic notes during that operating  
25 board meeting?

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1 A I can't swear that I took my notes during  
2 that operating board meeting. I remember I took  
3 notes during some of the meetings surrounding that  
4 situation. I can't tell you, sitting here right  
5 now, if I took notes for that operating board  
6 meeting or not.

7 Q Okay. Can you recall if in any of the notes  
8 that you took surrounding that situation that you  
9 just referred to, that you recorded that there was  
10 this difference between oral sex and intercourse as  
11 a prohibition under the premarital sex prohibition  
12 under the righteous living core value?

13 A Honestly, I don't recall.

14 Q You mentioned a moment ago that the righteous  
15 living core value was based on Judeo-Christian  
16 values; is that right?

17 A Yes.

18 Q Okay. So all employees are supposed to  
19 adhere to that righteous living Judeo-Christian  
20 based value, right?

21 A Yes.

22 Q Do you think that it's fair to punish a woman  
23 for getting pregnant and not being married?

24 A I don't feel like anybody was punished.  
25 Punishment wasn't the intent. That's implying an

1 intent that wasn't there.

2 Q What do you mean by that?

3 A Exactly what I said. There was no intent to  
4 punish.

5 Q Do you think losing your job is not  
6 punishment? I mean, that seems like it would be  
7 pretty brutal to lose your job when you're pregnant.

8 A I think violating a value that you're aware  
9 of is the reason that somebody is -- loses their  
10 job.

11 Q Okay. My question was, do you think that  
12 it's fair to terminate a -- which I said punish.  
13 But do you think it's fair to terminate a woman who  
14 notifies you that she's pregnant, no matter how the  
15 pregnancy came about?

16 A We don't terminate people for pregnancy when  
17 they notify us of pregnancy.

18 Q Well, you terminated Caitlin O'Connor when  
19 she notified you.

20 A Yes, because she violated a core value, but  
21 not because she was pregnant.

22 Q Okay. But it was in the context of her  
23 notifying you that she was pregnant, right?

24 A That's true, yes.

25 Q Okay. And at that same time, were you aware

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1 that she was requesting information about FMLA?

2 A I believe in her e-mail that she said  
3 something about FMLA information.

4 Q Okay. And do you have any knowledge as to  
5 whether or not when someone requests FMLA there are  
6 any obligations on the part of the employer to  
7 provide them information about their rights under  
8 the FMLA?

9 A I know that we regularly grant FMLA leave,  
10 and so I'm not sure how to answer that.

11 Q In Caitlin O'Connor's case, do you know if  
12 she was provided a notice of her rights under the  
13 FMLA after she gave the notice to the company that  
14 she was pregnant and was requesting information  
15 about FMLA?

16 A I don't know that she was -- I don't know if  
17 anything was provided to her related to FMLA at that  
18 time. I don't know. I'm not -- I'm not the HR  
19 person that was asked about FMLA.

20 Q If an employee is asked, are they required to  
21 provide intimate details about their personal lives  
22 to remain employed at Ramsey Solutions?

23 A I think I need a more specific question. I'm  
24 not sure how to answer.

25 Q Sure. If an employee is asked if they're

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1 engaging in premarital sex, and they just say that's  
2 none of your business as my employer for you to have  
3 this information --

4 A To my knowledge --

5 Q -- would they be terminated?

6 A To my knowledge, that's never happened. What  
7 you just put out is not a situation that I've dealt  
8 with.

9 Q Okay. So to your knowledge, if an employee  
10 declined to provide you information about their sex  
11 life if they were not married, they would remain  
12 employed?

13 A What you just described is not a situation  
14 I've been a part of.

15 Q So is it fair to say that every time it's  
16 come up where an employee has potentially violated  
17 the righteous living core value for engaging in  
18 premarital sex, in situations that you've been  
19 involved in where y'all have gone back and asked the  
20 employee about it, they've just fessed up the  
21 specific nature of their sex life?

22 A They've just answered the questions.

23 Q So y'all just assume that the employee is  
24 being honest?

25 A Yes.

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1 Q And you would agree with me that an employee  
2 who is engaging in premarital sex that becomes  
3 pregnant, that's much harder to lie about, right?

4 A Yes.

5 Q Okay. And that's because pregnancy is a  
6 visible condition, correct?

7 A Yes.

8 Q Do you know who established the righteous  
9 living core value?

10 A I'm sorry. Can you repeat that? You cut out  
11 at the beginning.

12 Q Sure. Do you know how -- do you know who  
13 established the righteous living core value, how  
14 that came about?

15 A I don't specifically know. It was here prior  
16 to -- it was in place prior to my starting with the  
17 organization.

18 Q Okay. Do you think the prohibition against  
19 premarital sex encourages gossiping in the company?

20 A No.

21 Q Well, how else would you find out if someone  
22 was living with someone and they weren't married?

23 A I can't recall specifically how the different  
24 situations have come up.

25 Q And gossiping is prohibited as a core value,

1 right?

2 A Uh-huh. That's right.

3 Q That's a yes?

4 A That's right, it is prohibited.

5 Q Is gossiping mentioned in the Bible?

6 A Yes.

7 Q Do you know where that's mentioned?

8 A No. I couldn't tell you the book and verse,  
9 no.

10 Q Getting into unmarried people's sex lives,  
11 does that discourage honesty and authenticity with  
12 your employees?

13 A Not that I'm aware of, no.

14 Q And I think we discussed a moment ago that  
15 this, I guess, rule against premarital sex is not in  
16 writing anywhere specifically, right?

17 A No.

18 Q Okay. And would you agree that most  
19 important things are reduced to writing if they're  
20 really important?

21 A Our core values are still in writing and we  
22 talk about our core values regularly, so...

23 Q But specifically premarital sex is not in  
24 writing, right?

25 A Not anyplace that I'm aware of, no.

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1 Q Okay. Do you think that it should be in  
2 writing?

3 A I've never really given it much thought. The  
4 core values, again, are in writing, and they're  
5 discussed and talked about regularly.

6 Q Are they discussed in the weekly devotional  
7 meetings?

8 A Sometimes they're covered maybe in a  
9 devotional meeting, sometimes maybe they're covered  
10 in a staff meeting.

11 Q The mandatory devotional meetings, are they  
12 opened with prayer?

13 A Sometimes.

14 Q Are they typically closed with prayer?

15 A Typically they're closed with prayer, but not  
16 always. But probably more often than not.

17 Q Okay. Are the devotional meetings recorded?

18 A I believe they are sometimes, maybe not  
19 always. I'm not sure.

20 Q Okay. Are employees encouraged to record  
21 them if they want to?

22 A We -- I've -- we've never talked about it. I  
23 don't know. No, I would say they're not encouraged,  
24 but it's not talked about. I don't know.

25 Q Okay. Are they discouraged from recording



1 the meetings?

2 A I can't recall ever having a conversation or  
3 anything said about employees recording or not  
4 recording devotionals.

5 Q Okay. So was the first time that you talked  
6 with Caitlin O'Connor about her pregnancy when you  
7 met with her with Suzanne Simms?

8 A Yes.

9 Q Okay. Did you have any other meetings with  
10 her besides that one?

11 A Not that I can recall.

12 Q Okay. Did you have any meetings with anyone  
13 else about Caitlin O'Connor's pregnancy?

14 A I'm sure we talked about it in HR committee,  
15 but I don't recall the meeting specifically.

16 Q And are notes taken during HRC meetings?

17 A Typically, yes.

18 Q Who takes the notes?

19 A Jack Galloway.

20 Q Okay. Are the notes disseminated to the HRC  
21 after the meeting?

22 A Usually, yes.

23 Q Are they disseminated by e-mail?

24 A Yes.

25 Q Did that happen with respect to Caitlin

1 O'Connor? Were there notes made about the decision  
2 to terminate Caitlin O'Connor?

3 A Probably. I don't recall specifically.

4 Q Did you agree with the decision to terminate  
5 Caitlin O'Connor?

6 A I did.

7 Q And were you a part of that decision? Were  
8 you a decision-maker?

9 A Yes, as part of the HRC, I was.

10 Q When the decision was made to terminate  
11 Caitlin O'Connor, did you know that she had other  
12 children out of wedlock?

13 A No. I knew she had other children. I didn't  
14 know if they were out of wedlock or not.

15 MS. COLLINS: Now, if you could pull up  
16 the document that's been previously marked as, I  
17 believe it's Exhibit Number 5 in the deposition.

18 (WHEREUPON, a document was presented,  
19 previously marked as Exhibit Number 5.)

20 MS. SANDERS: For the record, I just  
21 handed the witness Exhibit 5.

22 BY MS. COLLINS:

23 Q And on the -- I guess it's the -- on  
24 Page 103, it's the e-mail -- starts the e-mail from  
25 Caitlin O'Connor, or Eastwood it has in her

1 signature line.

2 THE WITNESS: I don't have a 103. I  
3 have a 104, 105, 106, and I have an 83,84, 85, 86.

4 MS. SANDERS: Heather, it looks like --  
5 can you pull the Exhibit 5 up in the chat? We seem  
6 to be missing some pages.

7 BY MS. COLLINS:

8 Q Okay. Well, let's just go to Page -- it's on  
9 Page 106. I'm just referring to the first e-mail  
10 that Caitlin O'Connor sent.

11 THE WITNESS: Okay. I have 106.

12 MS. SANDERS: She has that, yes. Okay.

13 THE WITNESS: Okay. I've got it.

14 BY MS. COLLINS:

15 Q It's dated [REDACTED]. And you received a  
16 copy of this e-mail that day, on [REDACTED], right?

17 A Yes, I did.

18 Q Okay. And up above that on Page 105, it  
19 looks like Armando Lopez ordered it to the HRC  
20 committee and he cc'd Dave Ramsey, among others,  
21 correct?

22 A Yes, that's right.

23 Q Okay. And you received it as part of the  
24 HRC, right?

25 A That's correct.

1 Q And it looks like you wrote back at 4:48  
2 that, you said, "Did she talk to you or just e-mail  
3 this on her way out the door today? We've dealt  
4 with this before and I think we should handle it  
5 exactly the same way, lots of grace, lots of  
6 generosity, but our core values and what they stand  
7 for are clear."

8 A Yes.

9 Q Okay. All right. Now, as to the first  
10 sentence, "Did she talk to you or just e-mail this  
11 on her way out the door," why did you ask that?

12 A It just felt like something that was -- that  
13 was worthy of an in-person conversation and maybe a  
14 follow-up with e-mail, so I was surprised it was  
15 just sent via e-mail.

16 Q Are there any rules that certain  
17 conversations need to take place in person versus an  
18 e-mail?

19 A No.

20 Q Okay. And when you say, "We've dealt with  
21 this before...", what do you mean?

22 A I mean, we've dealt with someone having  
23 premarital sex before.

24 Q Okay. And you say, "...I think we should  
25 handle it exactly the same way." As who? What are

1 you specifically referring to?

2 A Specifically as referring to somebody who's  
3 had premarital sex before and ended up pregnant, we  
4 want to take care of the unwed mother and the baby  
5 that's on the way. And so lots of grace, lots of  
6 love, lots of generosity, but you can't continue to  
7 work for us and violate our core values.

8 Q Doesn't grace encompass forgiveness?

9 A Sure.

10 Q Does Ramsey Solutions consider offering grace  
11 to its employees a part of its core values?

12 A Sure.

13 Q Was it ever discussed that it would set a  
14 better example for Ramsey Solutions to extend grace  
15 to a pregnant woman rather than offering her money,  
16 letting her keep her job?

17 A Yeah, I think offering a generous severance  
18 with health insurance benefits is a lot of grace.

19 Q What about letting her keep her job, wouldn't  
20 that be extending grace as well?

21 A If somebody violates our core values, they  
22 don't get to continue to work here in that  
23 situation.

24 Q So y'all draw a line on what the grace is,  
25 right, what grace is extended?

1 MS. SANDERS: Object to the form.

2 You can answer.

3 THE WITNESS: We just draw a line around  
4 some conduct that violates core values.

5 BY MS. COLLINS:

6 Q Now, in this e-mail thread, it looks like --  
7 let's see.

8 Well, when you wrote the response that "We've  
9 dealt with this before and I think we should handle  
10 it exactly the same way," is it fair to say that the  
11 decision to terminate Caitlin O'Connor had been made  
12 at that time?

13 A If it was what it seemed on its face via her  
14 e-mail, then yes. But we met with her when she  
15 returned to the office and she confirmed it was what  
16 it seemed on its face, which was she had engaged in  
17 premarital sex.

18 Q And on the first page, Mark Floyd wrote back  
19 that it was classless on her part. How did you  
20 interpret that?

21 A What I said earlier about not having a  
22 conversation and just sending an e-mail. It just  
23 felt like it warranted a conversation. That's how I  
24 interpreted it.

25 Q Did you think it was classless of her --

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1 (Overlapping speech.)

2 A Do I think it was classless --

3 Q Did you think it was classless of Caitlin

4 O'Connor?

5 A Did I think it was classless of her? I'm not

6 sure I thought about it one way or the other as

7 classless or not classless. I just thought it

8 warranted a conversation.

9 Q Okay. Have we covered everything that went

10 on that you can recall about the meeting that you

11 had with Caitlin O'Connor and Suzanne Simms?

12 A Yes. That's all I can recall, what I told

13 you already.

14 Q Okay. Did you and Suzanne Simms have any

15 conversations after the meeting?

16 A I'm sure we probably did, but I couldn't tell

17 you what they were sitting here right now.

18 Q Did you take any notes?

19 A I don't believe so.

20 MS. SANDERS: Heather, can we take a

21 break soon?

22 MS. COLLINS: Yeah, yeah, yeah. We can

23 go ahead and take a break right now. That's fine.

24 MS. SANDERS: I don't want to interrupt

25 you. There is a little bit of a delay and I thought

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1 you were pausing. Sorry if I interrupted.

2 MS. COLLINS: That's okay. Let's take a  
3 break.

4 MS. SANDERS: Okay. Thank you.

5 (Recess observed.)

6 MS. COLLINS: Back on the record.

7 BY MS. COLLINS:

8 Q Ms. Sievertsen, is it fair to say that you  
9 don't have any formal training in human resources?

10 A That's fair to say, yes.

11 Q Okay. Do you know whether or not it's  
12 illegal to terminate someone when they request FMLA?

13 A I don't believe a request for FMLA is a  
14 terminable offense, generally.

15 Q Okay. Well, do you know whether or not it's  
16 illegal to terminate someone if they notify you they  
17 need FMLA?

18 A I thought I just answered that. To the best  
19 of my knowledge, FMLA -- requesting FMLA is not  
20 something you terminate somebody for.

21 Q Okay. And is that because it's illegal to do  
22 so?

23 MS. SANDERS: Object to the form.

24 THE WITNESS: I don't know technically  
25 if it's illegal or not.



1 BY MS. COLLINS:

2 Q Have you ever been involved in a fashion show  
3 at Ramsey where women are shown what type of summer  
4 clothing or what type of clothing is appropriate in  
5 the summertime?

6 A We, as a funny way to show it, years ago, had  
7 a situation where we just -- again, in kind of a  
8 humorous fashion, had a pretend fashion show.

9 Q Was it just for the women of the company?

10 A Yes.

11 Q Was it just to show women what type of  
12 clothing was appropriate to wear in the summertime?

13 A Yes.

14 Q Was a similar fashion show done for the men  
15 of the company?

16 A I don't recall one being done for the men.

17 MS. COLLINS: Okay. If you could pull  
18 up Exhibit Number 6 for me, please.

19 (WHEREUPON, a document was presented,  
20 previously marked as Exhibit Number 6.)

21 MS. SANDERS: For the record, I've  
22 handed her a paper exhibit, Number 6.

23 BY MS. COLLINS:

24 Q Now, Ms. Sievertsen, have you seen the e-mail  
25 at the bottom of Page 2170, the one from Dave

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1 Ramsey?

2 A I was on that e-mail. I'm sure I -- so I'm  
3 sure I saw it. Let me read it.

4 (Reviewing document.) Yes.

5 Q Okay. And is this typical that Mr. Ramsey  
6 would be involved in an administrative assistant's,  
7 I guess, notification that they're pregnant at the  
8 company?

9 A No, not typically.

10 Q Okay. Is he on the HRC e-mails; do you know?

11 A No, he's not. Not on the HRC distribution.

12 Q And Mr. Ramsey writes back in response to  
13 Mr. Lopez forwarding the initial e-mail from Caitlin  
14 O'Connor that she was pregnant, he writes back, "So  
15 sad. The reason she sent an e-mail is she is scared  
16 and embarrassed."

17 Was there any further discussion about  
18 Caitlin O'Connor being sad or embarrassed or did she  
19 specifically say that she was sad or embarrassed  
20 about being pregnant?

21 MS. SANDERS: Object to the form.

22 THE WITNESS: Can I respond?

23 MS. SANDERS: Yes.

24 THE WITNESS: I don't recall her saying  
25 she was sad or embarrassed.

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1 BY MS. COLLINS:

2 Q Do you recall her saying she was scared or  
3 embarrassed?

4 A I don't recall her saying she was scared or  
5 embarrassed.

6 Q Okay. And Mr. Ramsey goes on to say, "Jen or  
7 Suzanne, please pick up the phone and call her  
8 today."

9 Did you do that or did just Ms. Simms do  
10 that?

11 A I did not call Caitlin.

12 Q Okay. To your knowledge, did Suzanne Simms  
13 do that?

14 A I believe she did.

15 Q Okay. Do you know if she spoke to her or if  
16 she just texted with her?

17 A I don't recall.

18 Q Okay. And Mr. Ramsey also writes, "Tell her  
19 we will work this out with her next week, but she  
20 will be loved and cared for. Then next week we will  
21 follow the steps we did before."

22 What did you interpret that to mean, "Then  
23 next week we will follow the steps we did before"?

24 A What I believed was he was saying the same  
25 thing I had said, we'll show her lots of grace and

1 generosity for her and the baby on the way, but that  
2 she can't continue working here because she's  
3 violated our core values.

4 Q And the last sentence says, "We were thorough  
5 because that is the right thing to do."

6 What did you interpret that to mean?

7 A The "lots of grace, care for the child,  
8 money, counseling, pastor support," the previous  
9 sentence.

10 Q So, is it fair to say that as of 5:10 a.m. on  
11 [REDACTED], that the decision had pretty much been  
12 made that Caitlin O'Connor was going to be  
13 terminated?

14 A I think the decision was made, again, as I  
15 said earlier, when she sent the e-mail, assuming  
16 that it was as it appeared on its face, which she  
17 confirmed when she met with us when she returned to  
18 the office.

19 Q Did you review any documents to prepare for  
20 your deposition today?

21 A I did review some documents.

22 Q What did you review?

23 MS. SANDERS: I object to the extent it  
24 calls for any attorney/client privileged  
25 information.

1                   You can answer that.

2                   THE WITNESS: I don't recall everything,  
3 but it was some of the documents that were produced  
4 as part of discovery.

5 BY MS. COLLINS:

6 Q           And you were involved in the discussions when  
7 it came out that [REDACTED] had had several  
8 affairs, right?

9 A           Right. As part of the operating board, I was  
10 part of that.

11 Q           [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15 A           [REDACTED]  
16 [REDACTED]

17 Q           Okay. Well, you were involved in setting up  
18 counseling sessions for [REDACTED] and his wife,  
19 [REDACTED], right?

20 A           I didn't personally set up any counseling  
21 arrangements. If you're asking if I was part of a  
22 discussion around that, I was. But did I personally  
23 set up any of that, no, I did not personally set up  
24 any of that.

25 Q           Okay. Well, you made sure he was registered

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[REDACTED]

A That was part of what we had decided, but I didn't personally -- again, I didn't personally set up any of those arrangements.

Q Okay. And he was offered a restoration plan, right?

A He and his wife had agreed to -- that they were trying to walk a restoration plan for their marriage.

Q Okay. Do you know if there was any discussion with Caitlin O'Connor as far as a restoration plan or some way to forgive her for engaging in premarital sex?

A No.

Q Okay. And the -- you had mentioned earlier that an addiction such as pornography are a violation of righteous living, correct?

A Yes.

Q And you've been involved in some of those situations, where it's come out that an employee has been looking at pornography, right?

A Yes.

Q And had they been offered the opportunity to get counseling or go to Celebrate Recovery to help them with that pornography addiction before they're

1 terminated?

2 A Yes.

3 Q And most of the employees who -- well, all of  
4 the employees who it's come to your attention have  
5 pornography issues, they're all male employees,  
6 right?

7 A Yes.

8 Q Okay.

9 A The ones I'm aware of, yes.

10 Q Okay. So, the employees that you found out  
11 had an issue with pornography, they were given a  
12 second chance, right?

13 A For pornography, as well as other addictions  
14 we've become aware of, if somebody wants to walk a  
15 recovery path and are actually able to walk that  
16 recovery path, they're given that option.

17 Q Okay. But there's no recovery path if you  
18 become pregnant, right?

19 A Righteous living violation we've deemed as  
20 different than an addiction. A righteous living  
21 premarital sex we've deemed as different than an  
22 addiction recovery.

23 Q Okay. But the pornography, whether it's an  
24 addiction or not, looking at pornography is a  
25 righteous living violation, right?

**Attorneys Eyes Only**

1 A Yes.

2 Q Okay. And that's only been -- that's only  
3 come up in the context with male employees, looking  
4 at pornography, correct?

5 A To the best of my knowledge. I can only  
6 think of male employees, yes.

7 Q Okay. And there are second chances given to  
8 those male employees if they go through recovery  
9 steps, right?

10 A For pornography, yes.

11 Q Okay. But there's no -- there's no recovery  
12 program for a woman who notifies you that she's  
13 pregnant as a result of premarital sex?

14 A It's not an addiction issue. We've  
15 determined that premarital sex is premarital sex.

16 Q Okay. And as you sit here today, you can't  
17 say where in the Bible addiction is covered?

18 A No.

19 Q And you can't say where in the Bible it  
20 prohibits premarital sex, can you?

21 A No, but I know it's in there.

22 Q In the Old Testament or New Testament?

23 A Probably both, but I can think more -- I can  
24 think more about New Testament situations.

25 Q Doesn't the New Testament also state that



Attorneys Eyes Only

1 you're not supposed to throw stones at people?

2 A I believe there's a story about that.

3 Q Do you recall who was the -- who the stones  
4 were being thrown at?

5 A I don't recall stones being thrown. I  
6 remember there being a reference to stones being  
7 thrown.

8 Q Do you remember the context?

9 A Loosely, yes.

10 Q What was it? What do you remember?

11 A A woman that was engaged in sexual immorality  
12 being brought before the Pharisees.

13 Q Okay. And didn't Jesus -- wasn't Jesus  
14 involved in that story?

15 A Yes.

16 Q Didn't he encourage the Pharisees not to  
17 throw stones at the woman who was engaging in  
18 premarital sex?

19 A I believe so.

20 Q So, is Ramsey Solutions more like the  
21 Pharisees or the woman?

22 A I never recall having had a discussion about  
23 Ramsey Solutions as it relates to that story in the  
24 Bible.

25 MS. COLLINS: Okay. All right. Let me

**Attorneys Eyes Only**

1 take a quick break and I just need to review my  
2 notes. Off the record.

3 (Recess observed.)

4 MS. COLLINS: Back on the record.

5 BY MS. COLLINS:

6 Q Ms. Sievertsen, have you looked at or  
7 referred to anything other than the exhibits that  
8 I've discussed throughout this deposition?

9 A Have I looked at? Could you repeat the  
10 question? You cut out for a minute.

11 Q Sure. Other than the exhibits that I've  
12 provided, have you looked at or referred to any  
13 documentation or notes or anything throughout the  
14 course of this deposition?

15 MS. SANDERS: She means today during the  
16 deposition.

17 THE WITNESS: Oh, during the deposition.

18 I wrote down some things as you were  
19 asking me questions, the board member names, the  
20 direct reports, and I have some other documents that  
21 were notes of mine from discussions with my  
22 attorney.

23 BY MS. COLLINS:

24 Q Okay. So, the notes -- are the notes that  
25 you have, are they in front of you?

Attorneys Eyes Only

1 A They're beside me.

2 Q Okay. And have you looked at those during  
3 the deposition?

4 A I haven't -- I haven't looked at them as part  
5 of my responses for the deposition, no.

6 MS. COLLINS: Okay. Well, I'm going to  
7 mark those notes as an exhibit to the deposition. I  
8 think they would be Exhibit Number 15.

9 MS. SANDERS: Objection to that,  
10 Heather. She didn't have them in front of her.  
11 They were off to the side. They were things she  
12 looked at before her deposition began.

13 MS. COLLINS: Well, if they're on the  
14 table, then they're going to be part of the record  
15 in this deposition.

16 MS. SANDERS: We'll object to that.

17 MS. COLLINS: So we're going to mark  
18 those -- okay, that's fine, you can object.

19 We're going to mark those as Exhibit  
20 Number 15, and the list that you made of the  
21 operating board as well as the people that you  
22 supervise, we're going to mark those as Exhibit  
23 Number 16.

24 / /

25 / /

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1 (WHEREUPON, a document was marked as  
2 Exhibit Number 15.)

3 (WHEREUPON, a document was marked as  
4 Exhibit Number 16.)

5 MS. SANDERS: No objection to that.

6 MS. COLLINS: If you'll scan a copy of  
7 both of those and send them to the court reporter at  
8 the -- well, let's go off the record for one second.

9 (Discussion off the record.)

10 BY MS. COLLINS:

11 Q Ms. Sievertsen, for the document that's being  
12 marked as Exhibit Number 15, just make sure that the  
13 entire document that are the notes that you had on  
14 the table with you are scanned and produced to the  
15 court reporter, okay?

16 A I'll give them to my attorney.

17 MS. COLLINS: Okay. That's all I have.

18 MS. SANDERS: Nothing further.

19 THE REPORTER: Regular turnaround okay?

20 MS. COLLINS: Yes, fine.

21 THE REPORTER: Did you want the witness  
22 to read and sign?

23 MS. SANDERS: Yes, she will read and  
24 sign. And we'd like a copy.

25 FURTHER DEPONENT SAITH NOT

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(Proceedings concluded at 11:20 a.m.)

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**E R R A T A P A G E**

I, JENNIFER LYNN SIEVERTSEN, having read the foregoing deposition, Pages 1 through 59, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

<b>PAGE</b>	<b>LINE</b>	<b>SHOULD HAVE BEEN</b>
<u>9</u>	<u>20</u>	<u>Chris Dean and Amy Warren should be added</u>
<u>10</u>	<u>18</u>	<u>"profession" should be "professional"</u>
<u>23</u>	<u>17</u>	<u>Should be "We've just drawn the line for termination at intercourse."</u>
<u>31</u>	<u>20</u>	<u>"Jeremy Brelund" should be "Jeremy Breland"</u>
<u>31</u>	<u>21</u>	<u>Luke Lefevre should be added</u>
<u> </u>	<u> </u>	<u> </u>
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*Jennifer Lynn Sievertsen*  
JENNIFER LYNN SIEVERTSEN

Notary Public: *Patti Harris*

My Commission Expires: *February 24, 2024*

Reported by: Jerri L. Porter, RPR, CRR, LCR



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REPORTER'S CERTIFICATE

STATE OF TENNESSEE

COUNTY OF Davidson

I, Jerri L. Porter, RPR, CRR, Licensed Court Reporter, with offices in Nashville, Tennessee, hereby certify that I reported the foregoing deposition of JENNIFER LYNN SIEVERTSEN by machine shorthand to the best of my skills and abilities, and thereafter the same was reduced to typewritten form by me. I am not related to any of the parties named herein, nor their counsel, and have no interest, financial or otherwise, in the outcome of the proceedings.

I further certify that in order for this document to be considered a true and correct copy, it must bear my original signature, and that any unauthorized reproduction in whole or in part and/or transfer of this document is not authorized, will not be considered authentic, and will be in violation of Tennessee Code Annotated 39-14-104, Theft of Services.



Jerri L. Porter, RPR, CRR, LCR  
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My Notary Public Commission Expires: 2/6/2022  
LCR 335 - Expires: 6/30/2022



















