

**CAITLIN O'CONNOR**

**VS.**

**LAMPO GROUP**

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**30(b)(6), Attorneys Eyes Only**

**JACK GALLOWAY**

**September 30, 2021**



**R. Michelle Smith, RMR, LCR, CCR, FPR, CLR**

Chattanooga (423)266-2332 Jackson (731)425-1222  
Knoxville (865)329-9919 Nashville (615)595-0073 Memphis (901)522-4477

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1 CONFIDENTIAL  
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 a/k/a  
9 RAMSEY SOLUTIONS,

10 Defendant.

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12  
13 \*\*\*CONFIDENTIAL\*\*\*  
14 \*\*\*ATTORNEYS' EYES ONLY\*\*\*  
(UNTIL FURTHER DETERMINATION)

15 30(b)(6) Video Recorded and Videoconference  
16 Deposition of:

17 THE LAMPO GROUP, LLC a/k/a  
18 RAMSEY SOLUTIONS by JACK GALLOWAY

19 Taken on behalf of the Plaintiff  
20 September 30, 2021

21 Commencing at 9:45 a.m.

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22  
23 Elite-Brentwood Reporting Services  
24 MICHELLE SMITH, RDR, LCR, CCR, FPR, CLR, CLVS, CDVS  
25 Nashville, Tennessee  
(615)595-0073

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A P P E A R A N C E S

For the Plaintiff, via videoconference:

MS. HEATHER MOORE COLLINS  
MS. ASHLEY WALTER  
Collins & Hunter PLLC  
7000 Executive Center Drive, Suite 320  
Brentwood, TN 37027  
(615)724-1996  
Heather@collinshunter.com  
Ashley@collinshunter.com

Attorney For Defendant, via videoconference:

MS. LESLIE SANDERS Attorney at Law  
Webb Sanders  
611 Commerce Street, Suite 3102  
Nashville, TN 37203  
(615)4915-3300  
Lsandres@websanderslaw.com

ALSO PRESENT:

MS. MARY CIEZADLO, Legal Videographer  
MR. DANIEL CORTEZ  
MR. ARMANDO LOPEZ  
MS. CAITLIN O'CONNOR



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

The 30(b)(6) Video Recorded and  
Videoconference of JACK GALLOWAY was taken by  
Counsel for the Plaintiff, by Agreement, with all  
participants appearing at their respective  
locations, on September 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 proceedings  
herein.

It is agreed that R. MICHELLE SMITH, RDR, 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  
was not discussed.

\* \* \*

1  
2  
3 THE VIDEOGRAPHER: We are now on the  
4 record. Today is Thursday the 30th of September 2021  
5 and the time indicated on the video screen is 9:45  
6 a.m. This is the videoconference deposition of  
7 Jack Galloway taken in the matter of O'Connor versus  
8 The Lampo Group, LLC, also known as Ramsey Solutions;  
9 Case number 3:20-cv-00628, filed in the United States  
10 District Court for the Middle District of Tennessee,  
11 Nashville Division.

12 My name is Mary Ciezadlo, the videographer.  
13 The court reporter is Michelle Smith, both in  
14 association with Elite-Brentwood Reporting Services.  
15 Since this deposition is being taken by video  
16 conference, the oath will be administered remotely by  
17 the court reporter.

18 Any digital exhibits marked during this  
19 deposition will be deemed as original for purposes of  
20 said deposition.

21 At this time I'll ask Counsel to identify  
22 yourselves and state whom you represent. And if you  
23 have any objections with the procedures outlined,  
24 please state so when you introduce yourselves. We  
25 will start with the noticing attorney.

1 MS. COLLINS: Heather Collins and Ashley  
2 Walter for the Plaintiff.

3 MS. SANDERS: Leslie Sanders for  
4 Defendants, and with me is Daniel Cortez, attorney  
5 for Defendant and Armando Lopez, the corporate  
6 representative.

7 THE VIDEOGRAPHER: Will the court  
8 reporter please swear in the witness.

9 \* \* \*

10 THE LAMPO GROUP, LLC a/k/a  
11 RAMSEY SOLUTIONS by JACK GALLOWAY,  
12 was called as a witness, and after having been duly  
13 sworn, testified as follows:

14

15 EXAMINATION

16 QUESTIONS BY MS. COLLINS:

17 Q. Okay. Could you state your full name for the  
18 record.

19 A. Jack Boone Galloway, Junior.

20 Q. And Mr. Galloway, are do you currently work?

21 A. Ramsey Solutions.

22 Q. And it is my understanding that you've been  
23 designated as a corporate representative for the  
24 30(b)(6) deposition that's been noticed for today;  
25 correct?

1 A. That is correct.

2 MS. SANDERS: And just for the record  
3 he's been designated for portions of that notice, to  
4 testify to portions of that notice.

5 MS. COLLINS: All right. I was going to  
6 attach the notice of deposition, as well as the  
7 objections to the next exhibit in this case.

8 And Michelle, I'm having difficulty attaching  
9 it through the chat.

10 THE REPORTER: Maybe Mary can help on  
11 this.

12 MS. COLLINS: Well, I don't -- I can send  
13 it over later, but we can just proceed, everyone  
14 should have a copy of it.

15 (WHEREUPON, a document was marked as  
16 Exhibit Number 19.)

17 BY MS. COLLINS:

18 Q. Mr. Galloway, it's my understanding that the  
19 first topic that you've been designated to testify to  
20 is topic Number 6, if you have the deposition notice  
21 in front of you, and topic Number 6 concerns the  
22 Defendant's righteous living policy, and that's  
23 including but not limited to its inception, origin,  
24 any modifications and interpretations. So we're  
25 going to start there this morning. What do you know



1 about --

2 MS. SANDERS: Heather, can you hold on  
3 one second so I can pull this up for him? He did not  
4 have it in front of him, but I'm pulling it up for  
5 him.

6 For the record I have pulled up the  
7 Defendant's objections and corporate representative  
8 designations. I'm not sure if that's what Exhibit 18  
9 [sic] but that is what the Defendant is reviewing,  
10 did you say Number 6, Heather?

11 MS. COLLINS: Yes. I'm sorry.

12 MS. SANDERS: Okay. He has that in front  
13 of him. Thank you.

14 And also before you go any further, Heather,  
15 is Ms. O'Connor, is she on this Zoom today?

16 MS. COLLINS: Yes.

17 MS. SANDERS: Okay. Thank you. I didn't  
18 hear you introduce her, I was just making sure.  
19 Okay. You've got it in front of you.

20 BY MS. COLLINS:

21 Q. Okay. Mr. Galloway, what do you know about  
22 the Defendant's "righteous living policy"?

23 A. Could you be more specific?

24 Q. Okay. When was it created?

25 A. Approximately 2013 our operating board at

1 that time created the document that now holds our  
2 righteous living core values. There is not a  
3 "righteous living policy".

4 Q. Okay. Did you work at Ramsey Solutions in  
5 2013?

6 A. Yes, I did.

7 Q. Were you part of that operating board that  
8 created the policy?

9 A. Yes, I was.

10 Q. Who else was part of that operating board  
11 that created the policy?

12 MS. SANDERS: Object to the form. He can  
13 answer.

14 THE WITNESS: I can start naming names.  
15 It has changed over time, but Suzanne Simms --

16 BY MS. COLLINS:

17 Q. No, Mr. Galloway, what I'm asking, is  
18 who was a part of the operating board at the time  
19 the policy was created, who, who were the core group  
20 of people that created the righteous living core  
21 values?

22 MS. SANDERS: Object to the form. He may  
23 answer.

24 //

25 //

1 THE WITNESS: Suzanne Simms, Jim  
2 Severson, Mark Floyd, Dave Ramsey, I'm uncertain on  
3 some of the other names that transitioned on and off  
4 during that time, but I believe Debbie LoCurto, who  
5 is no longer employed, was on the board at that time,  
6 myself, that's all that I'm certain of.

7 BY MS. COLLINS:

8 Q. Okay. Why did this become part of Ramsey  
9 Solutions' core values, the righteous living  
10 values?

11 A. Our core values as a whole that were put  
12 together around 2013, prior to that, they were a set  
13 of principles that we were operating by, but were  
14 not well documented. And they were being collected  
15 sort of as we articulated them, and as we grew, we  
16 started to take these operating principles that we  
17 were already operating by, and give them the  
18 verbiage and the phrases that we now call the core  
19 values.

20 Q. Okay. Has the righteous living value changed  
21 over time?

22 A. No.

23 Q. Has it been modified over time at all?

24 A. I would not say that it has been modified.  
25 It has been, as we have used it and had specific

1 situations we have -- we have not modified the core  
2 value.

3 Q. Did you say you have not modified the core  
4 value?

5 A. Not that I'm aware of, not modified or  
6 changed.

7 Q. And what is the righteous living core values  
8 based on?

9 A. Biblical principles.

10 Q. Specifically which Biblical principles?

11 A. Well, the Bible as a whole. The Bible is not  
12 our policy handbook, but the Bible as a whole is a  
13 set of Biblical principles that we attempt to use as  
14 we decide the core values of our company. We, our  
15 company is based on Biblical principles as a whole,  
16 the Bible as a whole, not a specific chapter and  
17 verse.

18 Q. Whose interpretation of the Bible?

19 A. It's not any one person's interpretation of  
20 the Bible. Our HR committee and occasionally our  
21 operating board are involved in interpreting the  
22 Bible as best we can, Biblical principles for  
23 everyday application and practical use in the  
24 workplace.

25 Q. Okay. And Ramsey Solutions is not a

1 religious organization, is it?

2 MS. SANDERS: Object to the form as  
3 being outside of the scope, but he may answer if he  
4 knows.

5 THE WITNESS: That is correct. We are  
6 not a 501c3 or a church.

7 BY MS. COLLINS:

8 Q. Does Ramsey Solutions impose the Biblically  
9 based righteous living core value on all of its  
10 employees?

11 A. Yes.

12 Q. And for the record when you say Biblically  
13 based, you're talking about the Christian Bible;  
14 right?

15 A. That's correct.

16 Q. Were any pastors or ordained ministers  
17 involved in the drafting of the righteous living core  
18 value?

19 A. No, they were not.

20 Q. Now, moving on to topic Number 7, it's  
21 Defendant's determination that its righteous living  
22 policy prohibits premarital sex, where did that come  
23 from?

24 A. It's a widely-held belief among Christians  
25 that the Bible teaches that sex is reserved for

1 marriage.

2 Q. Among which Christians?

3 A. Christians following Biblical principles,  
4 Christians that are using the Bible to determine how  
5 they should live.

6 Q. Okay. So do Christians who don't adhere  
7 to that belief that premarital sex is prohibited  
8 before or outside of marriage, are they not true  
9 Christians?

10 A. I do not have a -- I'm not an expert on that  
11 and I don't have an opinion on that.

12 Q. Does Ramsey Solutions only hire Christians?

13 A. We hire the best person for the position,  
14 skill fit, team fit, culture fit.

15 Q. To your knowledge have any non Christians  
16 been hired?

17 MS. SANDERS: Object to the form.  
18 It's outside of the scope, but he can answer if he  
19 knows.

20 THE WITNESS: We do not ask anyone during  
21 the interview process or during their employment if  
22 they are or are not a Christian.

23 //

24 //

25 //

1 BY MS. COLLINS:

2 Q. But all employees are expected to abide by  
3 the Biblically based righteous living core value;  
4 right?

5 A. Yes.

6 Q. And with respect to premarital sex,  
7 all employees are expected to not engage in  
8 premarital sex based on this Biblically based policy;  
9 correct?

10 A. Sex outside of marriage, including premarital  
11 sex.

12 Q. Okay. And as part of topic Number 7 it asks  
13 to know who made the determination that the righteous  
14 living core value that prohibits premarital sex,  
15 specifically who made that determination that that  
16 was going to be part of Ramsey Solutions' values that  
17 it imposes on its employees?

18 A. We make decisions by consensus, and so that  
19 would have been primarily our HR committee and  
20 occasionally our operating board as a whole on  
21 certain decisions like that.

22 Q. Were you a part of that determination?

23 A. Yes.

24 Q. Okay. Who else was a part of that  
25 determination, or was it just the same people that

1 you listed earlier?

2 A. It was the same group that I listed earlier  
3 originally, that's the original board, the names that  
4 I gave you earlier, so yes.

5 Q. When did it come up specifically that  
6 premarital sex was going to be prohibited under the  
7 righteous living core value?

8 A. I do not remember an exact date or its  
9 inception, but it -- prior to righteous living being  
10 a core value that was living righteously, including  
11 not having sex outside of marriage was something that  
12 our company valued and was operating by before there  
13 was a stated document of core values.

14 Q. Okay. So but where did that come from, that  
15 not engaging in premarital sex was considered part of  
16 living righteously?

17 A. It has been a part of our culture as long as  
18 I can remember. I don't remember of a specific  
19 conversation or start date to where any individual  
20 said this is how we define righteous living.  
21 Righteous living is trying to live a Biblical and  
22 Biblically righteous life including not having sex  
23 outside of the marriage. But the righteous living  
24 core value is not a sex only core value, it's not a  
25 core value that just deals with sex.



1 Q. Okay. What is the Biblical basis that the  
2 Bible prohibits premarital sex or extramarital  
3 sex?

4 A. There are a number of references in the Bible  
5 to sex within marriage, sexual purity, as well as it  
6 being a widely accepted understanding of the Bible  
7 among Christians, that the Bible instructs us to  
8 reserve sexual intercourse for marriage.

9 Q. Okay. And when you say it's widely accepted  
10 among Christians, are you speaking specifically about  
11 a certain group of Christians?

12 A. Christians following Judeo-Christian values,  
13 following the Bible.

14 Q. Okay. Do you mean evangelical Christians?

15 A. Yes.

16 Q. Okay. Because not all Christians agree that  
17 premarital sex is prohibited by the Bible; correct?

18 A. I do not know --

19 Q. Okay.

20 A. -- what all Christians believe.

21 Q. But you're aware that some Christians don't  
22 adhere to this belief that premarital sex is  
23 prohibited by the Bible; correct?

24 A. I, as a company representative, I don't have  
25 an opinion on what all Christians believe about the

1 topic of sex outside of marriage.

2 Q. Okay. Well, you just testified that it's a  
3 Christian belief that premarital sex was prohibited.  
4 So the converse is that some Christians don't, in  
5 fact, practice that belief; correct?

6 A. That may be true. What I stated was that it  
7 was a widely-held belief; I did not say that all  
8 Christians believe the same.

9 Q. So is it that it's a widely-held belief by  
10 the Christians and leadership at Ramsey Solutions?

11 A. That would be a true statement that we do  
12 believe that the Bible tells us to reserve sex for  
13 marriage, according to Biblical principles.

14 Q. How does Ramsey Solutions go about enforcing  
15 this policy or core value specifically with respect  
16 to premarital or extramarital sex?

17 A. We communicate with our team that we have an  
18 expectation that team members here are not having sex  
19 outside of marriage, and we communicate it to mind  
20 regularly in public settings. We do not seek out  
21 these situations, we do not ask people about their  
22 sexual lives, but if a situation comes to our  
23 attention that someone is having sex outside of  
24 marriage, then we would deal with that situation and  
25 learn more.

1 Q. Okay. Can you give me an example of how it  
2 would come to your attention that someone is having  
3 sex outside of marriage?

4 A. It could be that the team member discloses  
5 it, it could be that another team member discloses  
6 it, it could be that another person involved in the  
7 relationship discloses it.

8 Q. And with respect to the team member  
9 disclosures, does that include when a team member  
10 discloses that they're pregnant or their spouse or  
11 significant other is pregnant, do you look  
12 closely at whether or not sex would have taken place  
13 outside of marriage for that pregnancy to have  
14 occurred?

15 MS. SANDERS: Object as outside of the  
16 scope, but he may answer if he knows.

17 THE WITNESS: We do not ask team members  
18 certainly -- we do not make it a practice to ask team  
19 members if their pregnancy came from sex inside of  
20 marriage, we do not. That is not something that we  
21 do.

22 //

23 //

24 //

25 //

1 BY MS. COLLINS:

2 Q. Okay. So when I asked you a moment ago about  
3 the Biblical basis for the assertion that the Bible  
4 prohibits premarital sex, sitting here today can you  
5 identify any specific Bible verse that premarital sex  
6 is prohibited?

7 A. The belief is based on the totality of what  
8 the Bible teaches. There are many references  
9 to sex and living a sexually pure life, and we draw  
10 that belief from the totality of the Bible as a  
11 whole.

12 Q. Okay. So sitting here today you do not have  
13 a specific Bible verse that you can point to, or  
14 even a couple of Bible verses that support that  
15 assertion?

16 A. No.

17 Q. Okay. Also in topic Number 7 it asks to know  
18 how -- what is the basis that the prohibition, the  
19 Biblically based prohibition on premarital sex is  
20 consistent with Title VII?

21 MS. SANDERS: Object to the extent it  
22 asks for a legal conclusion, but he can answer the  
23 question.

24 THE WITNESS: Is there any way to mute  
25 the alerts?

1 MS. SANDERS: And Heather, just for a  
2 timeout, there are some alerts that are coming  
3 through and it's interfering with understanding your  
4 questions. So I'm not sure where it's coming from,  
5 but if anybody has alerts on, could we mute those? I  
6 don't know if everyone is hearing them, it may just  
7 be on our end.

8 MS. COLLINS: I'm hearing them but  
9 they're not on my end. I don't believe they're on  
10 ours.

11 MS. SANDERS: I'm just going to  
12 double-check his and make sure they're not coming  
13 from here. Give us just a second, Heather, it may be  
14 coming -- we have a borrowed laptop, so let us just  
15 double-check and make sure it's not coming --

16 THE VIDEOGRAPHER: Counsel, would you  
17 like to go off the record?

18 MS. SANDERS: Yes, that will be fine, it  
19 will just take us about 30 seconds.

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

22 (Brief break.)

23 THE VIDEOGRAPHER: We are back on the  
24 record at 10:12 a.m.

25 //

1 THE WITNESS: Would you mind to repeat  
2 the last question?

3 BY MS. COLLINS:

4 Q. Sure. Michelle, can you repeat the last  
5 question?

6 (WHEREUPON, the pending question was read  
7 back by the reporter.)

8 BY MS. COLLINS:

9 Q. Okay. Mr. Galloway, at any point in time has  
10 it been considered as to whether or not imposing  
11 Biblically based core values on Ramsey Solutions'  
12 employees is consistent with Title VII?

13 MS. SANDERS: And renew that objection to  
14 the extent it's calling for a legal conclusion, but  
15 he may answer, if he knows.

16 THE WITNESS: Our understanding is that  
17 sex outside of marriage is not a protected class  
18 under Title VII.

19 BY MS. COLLINS:

20 Q. And what is that understanding based on?

21 MS. SANDERS: Objection to the extent it  
22 calls for attorney-client privileged information, but  
23 otherwise he may answer.

24 THE WITNESS: Our legal counsel.

25 //

1 BY MS. COLLINS:

2 Q. And specifically who are you referring to  
3 when you say legal counsel?

4 MS. SANDERS: Objection, I believe that's  
5 calling for privileged information. He cannot  
6 answer.

7 MS. COLLINS: It's not calling for  
8 privileged information to ask who the attorney is.  
9 You can answer.

10 MS. SANDERS: I'll state the objection  
11 but he can answer.

12 THE WITNESS: Daniel Cortez

13 BY MS. COLLINS:

14 Q. Okay. So do you know any other facts that  
15 support Ramsey Solutions' position that imposing a  
16 Biblically based core value on all of its employees  
17 is consistent with Title VII's dictates against  
18 discrimination, including discrimination on the bases  
19 of religion and sex?

20 A. I don't understand the question, would you  
21 mind to rephrase?

22 Q. One of the topics that you were asked to come  
23 testify to today was topic Number 7, and you were  
24 designated for that topic, the last clause of the  
25 last sentence of topic Number 7 asks Defendant's

1 factual basis that this prohibition, and it's  
2 referring to the prohibition on premarital sex under  
3 its values is consistent with Title VII. So that's  
4 what I'm asking you, are there any other facts that  
5 you have as a designated corporate representative,  
6 that the policy or the core value that's encompassed  
7 under the righteous living core value that prohibits  
8 premarital sex is consistent with Title VII, which  
9 includes discrimination on the bases of sex and  
10 religion?

11 A. There are no other facts.

12 Q. Okay. Now, I'm moving on to topic Number 8.  
13 And the first part of that is Defendant's  
14 determination that its righteous living policy does  
15 not prohibit oral sex in the context of premarital  
16 sex or extramarital affairs, where did that concept  
17 come from?

18 MS. SANDERS: Object to form. He may  
19 answer.

20 THE WITNESS: We have never stated that  
21 we do not prohibit sex -- oral sex outside of  
22 marriage, or we have not made any determination,  
23 conclusion, statement as a company around oral sex  
24 being okay. We have determined that intercourse  
25 outside of marriage is immediately terminable.



1 BY MS. COLLINS:

2 Q. Okay. Who made that determination?

3 A. Our human resources committee and operating  
4 board as a whole.

5 Q. When was that decision made?

6 A. I do not remember an exact date when that  
7 decision was made, but it was -- has always been a  
8 part of our culture, even prior to the formation of  
9 the operating board structure today, the company  
10 operated under that principle, and the leaders prior  
11 to that also operated under that practice.

12 Q. Okay. But there did come a time when whether  
13 or not someone engaged in oral sex versus intercourse  
14 was parsed out by those people in leadership;  
15 correct?

16 MS. SANDERS: Objection to the extent  
17 that Ms. O'Connor is present and to the extent that  
18 the questions you're asking him are going to lead to  
19 information that is subject to attorney's eyes only.

20 BY MS. COLLINS:

21 Q. You can answer the question.

22 MS. SANDERS: You can answer it, but if  
23 Ms. O'Connor is present, you can't answer any  
24 information that has been designated attorney eyes  
25 only.

1 MS. COLLINS: Yes, she -- yes, he can.  
2 We've got to be able to proceed with this deposition.  
3 My client has a right to be here during the  
4 deposition, and so you know, it's already difficult  
5 enough with the speaking objections that have been  
6 going on this morning, I need to be able to proceed  
7 and take this deposition without these constant  
8 interruptions.

9 MS. SANDERS: I want you to proceed, but  
10 there is information that has been designated as  
11 attorney's eyes only, which means Ms. O'Connor may  
12 not be present. I'm fine with you proceeding. She  
13 just -- "attorney's eyes only" means Ms. O'Connor  
14 doesn't get the information.

15 MS. COLLINS: We need to go off the  
16 record and see if we can get the Judge on the phone,  
17 because my client has a right to attend a corporate  
18 deposition.

19 MS. SANDERS: Okay. That will be fine.

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

22 (Brief break.)

23 THE VIDEOGRAPHER: We are back on the  
24 record at 10:40 a.m.

25 //

1 MS. COLLINS: Michelle, can you read back  
2 the last question, because I have no idea where we  
3 were. I think we were on topic eight.

4 (WHEREUPON, the pending question was read  
5 back by the reporter.)

6 BY MS. COLLINS:

7 Q. All right. Now, with the respect to  
8 the -- and really this goes to topic Number 8, about  
9 the righteous living core value and the distinction  
10 between oral sex and intercourse. So as I understand  
11 it, I'm just recapping a little bit of testimony  
12 since we had a break, if -- if Ramsey Solutions finds  
13 out that an employee had intercourse, then they  
14 determine that that violates the righteous living  
15 core value and they will immediately be terminated;  
16 right?

17 A. Intercourse outside of marriage.

18 Q. Okay. They'll be terminated?

19 A. Correct.

20 Q. But if it comes to their attention that they  
21 have been an employee who has engaged in oral sex,  
22 that does not necessarily mean immediate termination;  
23 correct?

24 A. That is correct.

25 Q. Okay. And you would agree with me that with

1 respect to intercourse, that a woman can get pregnant  
2 from that; right?

3 A. Yes.

4 Q. Okay. And a woman cannot easily hide a  
5 pregnancy; correct?

6 A. I would agree with that.

7 Q. So if a female employee comes to Ramsey  
8 Solutions and says I'm pregnant, and they know that  
9 she's unwed, she will be terminated?

10 A. If a female employee has had sex outside of  
11 marriage, there's a high likelihood that they would  
12 be terminated regardless of whether or not they were  
13 pregnant or not.

14 Q. Okay. And female employees have done that,  
15 they've come to Ramsey Solutions and said I'm  
16 pregnant and I'm not married, and every single one  
17 without exception has been terminated; right?

18 A. Every single team member that has had sex  
19 outside of marriage has been terminated.

20 Q. I'm asking you specifically about female  
21 employees who have come to Ramsey Solutions and  
22 informed them that they were pregnant and unwed, they  
23 have been all terminated without exception?

24 A. Correct.

25 Q. And that was for violation of the righteous

1 living core value?

2 A. Correct.

3 Q. Okay. Now, with respect to topic Number 8  
4 there is no Biblical basis for a distinction between  
5 intercourse and oral sex, is there, as being a  
6 violation of some sort of righteous living notion?

7 A. I'm not aware of Biblical references to oral  
8 sex.

9 Q. Okay. And is that based on any sort of  
10 Judeo-Christian value, that an employee who is not  
11 married and engages in premarital sex should be  
12 immediately terminated versus one who engages in oral  
13 sex?

14 A. A person who engages in oral sex may be  
15 terminated. We have not said that oral sex outside  
16 of marriage is okay or does not violate the righteous  
17 living core value. We have only said it does not  
18 mean immediate and automatic termination.

19 Q. Okay. And without getting into any of the  
20 protective order issues, that's because there has  
21 been a male employee who it came to the company's  
22 attention, admitted to having oral sex outside of  
23 marriage in an extramarital affair, but he was not  
24 terminated; correct?

25 //

1 MS. SANDERS: Object to the form. He can  
2 answer.

3 THE WITNESS: He was not terminated  
4 immediately; he was later terminated.

5 BY MS. COLLINS:

6 Q. Okay. And it's my understanding that you are  
7 not here to testify as to the ins and outs as to why  
8 he was terminated; right?

9 A. That is correct.

10 Q. Okay. Now, the last topic area, and then  
11 you're out of the hot seat, is topic Number 9, and  
12 that's about the Defendant's core values, including  
13 but not limited to the inception, origin,  
14 modification and interpretation of the values. I  
15 think we already covered all of that earlier. So is  
16 there anything else with respect to the inception of  
17 those core values that we have not already covered  
18 as far as the when, the where, the why, all of  
19 that --

20 A. No.

21 Q. -- that you feel is important?

22 A. Okay. I'm sorry. No.

23 Q. Okay. Now, I'm going to provide you one more  
24 document, and this one is Bates number, Leslie, 2315,  
25 we were provided this document last week.

1 MS. SANDERS: He's got that in front of  
2 him.

3 MS. COLLINS: He has it in front of him.  
4 Okay. I'm going to mark this as Exhibit 20,  
5 let me see if I can shoot it over for the court  
6 reporter.

7 MS. SANDERS: For the record while you're  
8 doing that, Heather, I handed the document -- excuse  
9 me, the Deponent the document with the Bates number  
10 Defendant 2315, which has just been marked as  
11 Exhibit 20.

12 MS. COLLINS: Okay. And Michelle, I'm  
13 going to go ahead and mark 2315 that was sent over in  
14 the chat as Exhibit 20.

15 (WHEREUPON, a document was marked as  
16 Exhibit Number 20.)

17 BY MS. COLLINS:

18 Q. Mr. Galloway, have you seen this document  
19 before?

20 A. Yes, I have.

21 Q. Okay. Do you know who created it?

22 A. I believe legal counsel created it.

23 Q. Okay. And does this explain -- well, what is  
24 your understanding as to what this document is  
25 explaining?

1 A. My understanding is that this was in response  
2 to an Interrogatory that asked for more information  
3 about the righteous living core value, including its  
4 inception and any Biblical references.

5 Q. Okay. And so is it your understanding that  
6 this covers all of that?

7 A. Yes.

8 Q. Okay. So this is the company's position on  
9 that topic?

10 A. Yes.

11 Q. Okay. All right. I think we can move on to  
12 the next witness. I don't see that you're designated  
13 for anything else, Mr. Galloway.

14 THE WITNESS: All right. Thank you.

15 MS. SANDERS: Thank you, Heather. I just  
16 have one question for the witness.

17

18 EXAMINATION

19 QUESTIONS BY MS. SANDERS:

20 Q. Earlier, Mr. Galloway, Ms. Collins asked you  
21 if there was any other information to add, just for a  
22 point of clarification, you talked about the drafting  
23 of those core values at the Operating board Retreat,  
24 you then talked about -- I believe you referenced a  
25 person who had gathered information, but you didn't



1 identify him by name. So to the extent that's  
2 information you did not provide, can you tell -- can  
3 you tell us today who that person was who gathered  
4 that information you referenced earlier?

5 A. Prior to the 2013 meeting, our HR director,  
6 Rick Perry, was the one who began documenting these  
7 operating principles that we were using, and writing  
8 them down. And then at the 2013 Retreat we took  
9 those ideas and transferred them into these phrases  
10 that we have today.

11 Q. That's all.

12  
13 EXAMINATION

14 QUESTIONS BY MS. COLLINS:

15 Q. I just have one follow-up question.

16 Mr. Perry is no longer with the company;  
17 correct?

18 A. That is correct.

19 Q. Okay. When did he leave?

20 A. He retired, his last date of employment was  
21 this summer, and he -- his last regular time in the  
22 office was prior to that. But his last day of  
23 actually being employed was this summer.

24 Q. Okay. That's all I have. We're ready for  
25 Ms. Simms, if she is ready we can go ahead and get

1 her started.

2 THE REPORTER: One moment, let's go off  
3 record.

4 MS. SANDERS: Okay.

5 MS. COLLINS: Okay.

6 THE VIDEOGRAPHER: The time is 10:50 a.m.  
7 we are going off the record. This will conclude the  
8 deposition of Jack Galloway.

9 FURTHER DEPONENT SAITH NOT

10 (Proceedings concluded at 10:50 a.m.)

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REPORTER'S CERTIFICATE

STATE OF TENNESSEE  
COUNTY OF DAVIDSON

I, R. MICHELLE SMITH, Licensed Court Reporter, with offices in Nashville, Tennessee, hereby certify that I reported the foregoing deposition of JACK GALLOWAY 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.

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MICHELLE SMITH, RDR, LCR, CCR, FPR, CLR, CLVS, CDVS  
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30(b)(6), Attorneys Eyes Only

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