

EXHIBIT D

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE STATE COURT OF DEKALB COUNTY
STATE OF OKLAHOMA

PATRICK C. DESMOND and MARY
C. DESMOND, individually and
MARY C. DESMOND, as
administratrix of the Estate
of Patrick W. Desmond,

Plaintiffs,

vs.

NARCONON OF GEORGIA, INC.
DELGADO DEVELOPMENT, INC.,
SOVEREIGN PLACE, LLC,
SOVEREIGN PLACE APARTMENT
MANAGEMENT, INC., LISA
CAROLINA ROBBINS, M.D., THE
ROBBINS GROUP, INC., and
NARCONON INTERNATIONAL,

Defendants.

Civil Action No.:
10A28641-2

Condensed &
Word Index

VIDEO DEPOSITION OF JETTE McGREGOR,

taken on behalf of the Plaintiffs, at 9:51 a.m., on
Friday, June 8, 2012, at the law offices of Holden
& Carr, 15 East 15th Street, Suite 3900, Tulsa,
Oklahoma, before Trisha G. Goodman, Certified
Shorthand Reporter in and for the State of
Oklahoma.

GOODMAN REPORTING, LLC ~ 918.749.5000

PO Box 2823, Tulsa, Oklahoma 74101

<p style="text-align: right;">54</p> <p>1 question.</p> <p>2 Q. Is that right?</p> <p>3 A. No.</p> <p>4 Q. Okay. That's not part of the mini hat for</p> <p>5 Overcoming the Brick Overcoat?</p> <p>6 A. No, not as far as I remember.</p> <p>7 Q. All right.</p> <p>8 A. How to get a bank loan? Is that what you</p> <p>9 asked? How to get a bank loan?</p> <p>10 Q. Yeah.</p> <p>11 A. It may be somewhere in the book, but I</p> <p>12 don't think it's in that particular...</p> <p>13 Q. In the mini hat checklist?</p> <p>14 A. Yeah.</p> <p>15 Q. Now, the way that the mini hats work is</p> <p>16 there is a checklist for each one of those</p> <p>17 positions, correct?</p> <p>18 A. I don't know exactly what -- I don't know</p> <p>19 of any mini hat for the area of intake.</p> <p>20 Q. All right. Well, let's back up then.</p> <p>21 A. Okay.</p> <p>22 Q. In order to be hatted in certain</p> <p>23 positions, you would agree with me that there is a</p> <p>24 hating checklist, correct?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">56</p> <p>1 Q. Okay.</p> <p>2 A. In -- what I was trying to say is, there</p> <p>3 are certain check sheets that are made up by</p> <p>4 actually ABLE International and issued to the</p> <p>5 centers. If I want to train or if we want to train</p> <p>6 a person in, I don't know, something that's not</p> <p>7 related to the program, we make up our own check</p> <p>8 sheet; it doesn't come from anyone.</p> <p>9 Q. Well, I guess -- and I appreciate the</p> <p>10 clarification.</p> <p>11 In terms of the delivery of the standard</p> <p>12 tech, --</p> <p>13 A. Yes.</p> <p>14 Q. -- the delivery of the standard tech,</p> <p>15 there are a number of generic hatted positions that</p> <p>16 are called out in how to run an effective Narconon?</p> <p>17 A. Correct.</p> <p>18 Q. All of those generic hatted positions, all</p> <p>19 of them have hating checklists, do they not?</p> <p>20 A. Every one of those books, running an</p> <p>21 effective Narconon, the ethics of the course, they</p> <p>22 have checklists.</p> <p>23 Q. So the reg has a checklist?</p> <p>24 A. There is not a course issued by</p> <p>25 International for reg.</p>
<p style="text-align: right;">55</p> <p>1 Q. And the hating checklist goes through</p> <p>2 what you need to do in order to be hatted in that</p> <p>3 position?</p> <p>4 A. Yes.</p> <p>5 Q. And those checklists are generic for all</p> <p>6 centers, right?</p> <p>7 A. Some of them. Not all.</p> <p>8 Q. Okay. All right. Do you know which ones</p> <p>9 are not generic for all of the centers?</p> <p>10 A. Most of them -- there are certain hating</p> <p>11 actions, mostly concerned with the technical</p> <p>12 delivery that are issued by ABLE International that</p> <p>13 are for all the centers. The checklists for the</p> <p>14 hating are usually created by each individual</p> <p>15 center, at least that's what we do at Arrowhead.</p> <p>16 Q. Okay. And is there a master template for</p> <p>17 at least what technical skills you've got to</p> <p>18 acquire in order to be hatted in something that's</p> <p>19 provided by International to the individual</p> <p>20 centers?</p> <p>21 A. Sir, I didn't understand that question.</p> <p>22 Q. Well, the individual centers are not just</p> <p>23 making up what you need to do in order to be hatted</p> <p>24 in some specific area on their own, are they?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">57</p> <p>1 Q. I understand what you're saying. But</p> <p>2 there are courses that the regs are required to</p> <p>3 take, particularly related to sales and finances</p> <p>4 and all that sort of stuff, that there is a hating</p> <p>5 checklist for?</p> <p>6 A. All I can speak for is stage one at</p> <p>7 Narconon Arrowhead, I know that.</p> <p>8 Q. Well, but isn't that part of what you're</p> <p>9 doing when you're doing a tech inspection, is</p> <p>10 making sure that the employees are properly hatted</p> <p>11 in whatever their areas of expertise are?</p> <p>12 A. A tech inspection does not get into that</p> <p>13 part of the administration. It more concentrates</p> <p>14 on -- it does get into some of the administration,</p> <p>15 but it more concentrates on what's actually being</p> <p>16 done technically with the program.</p> <p>17 Q. And just so we're all clear on this, by</p> <p>18 the tech inspection, the technology is really the</p> <p>19 materials that Mr. Hubbard wrote about how to</p> <p>20 deliver the surface?</p> <p>21 A. Mr. Hubbard did not write those materials.</p> <p>22 Q. They're based on Mr. Husband's writings?</p> <p>23 A. Correct. Yes.</p> <p>24 Q. Now, tell me -- let's talk specifically</p> <p>25 about the tech inspection that you did at --</p>

62

1 are -- there's some -- and I don't mean this in any
 2 way to be offensive at all, but I refer to it as
 3 glbberish.
 4 **A. I understand.**
 5 **Q.** And I've seen a lot of it in these
 6 documents, and I'm going to have to ask you to
 7 interpret that for me a little bit.
 8 **Who are these people? And I guess the way**
 9 **that I understand this is, this -- it's the person**
 10 **who's writing it typically signs down here, and**
 11 **then the person it goes to is above it.**
 12 **A. Yes.**
 13 **Q.** Is that how it normally works?
 14 **A. Yes. This is the originator, the bottom**
 15 **line.**
 16 **Q.** And that's you?
 17 **A. That's me. That's who it goes to, and**
 18 **this is who got a copy, cc, carbon copy.**
 19 **Q.** All right. Now, you're the director --
 20 and we're referring to 9828.
 21 You're the director of tech Narconon
 22 Arrowhead. Is that what that means?
 23 **A. Yes.**
 24 **Q.** And then what is that in parentheses out
 25 there next to that? What does that mean?

63

1 **A. It means I'm in Narconon Georgia. My**
 2 **position is that --**
 3 **Q.** I was over thinking it.
 4 **A. -- but I was actually in Narconon Georgia.**
 5 **Q.** That's just where you were?
 6 **A. Yes.**
 7 **Q.** I thought "IN" meant something.
 8 **A. No.**
 9 **Q.** Okay. And then you cc'd it to the ED of
 10 Narconon International?
 11 **A. Correct.**
 12 **Q.** And who is that?
 13 **A. Phil Hart.**
 14 **Q.** And then you sent to it the -- looks like
 15 the operations superintendent of International?
 16 **A. Right.**
 17 **Q.** And that's Yarko?
 18 **A. Yes.**
 19 **Q.** Before we get into this, did anybody else
 20 get a copy of this? Did you send anybody else a
 21 copy other than the people that you've identified
 22 here at the top?
 23 **A. I gave it to Mary, the ED Narconon**
 24 **Georgia --**
 25 **Q.** All right.

64

1 **A. -- before I left.**
 2 **Q.** Anybody else?
 3 **A. No.**
 4 **Q.** And then I've noticed that you also -- I
 5 believe there was somebody else that you were
 6 conversing with besides Yarko about your report.
 7 Am I wrong?
 8 **A. I don't think so.**
 9 **Q.** Okay. All right. Well, that's fine.
 10 **A. Okay.**
 11 **Q.** So you give a copy to Mary?
 12 **A. Yeah.**
 13 **Q.** Now, tell me what you did when you --
 14 well, let me back up.
 15 This copy that I have at 9828, which is
 16 your debrief, and then there is a follow-up email
 17 the next day, which is at 9832 of Exhibit No. 1.
 18 Do you see that?
 19 **A. Yes.**
 20 **Q.** And in that document, you're clarifying a
 21 couple of points in your report, right?
 22 **A. Yes.**
 23 **Q.** Are there any other reports of any kind
 24 that you generated in connection with your
 25 inspection of the Georgia facility?

65

1 **A. No.**
 2 **Q.** There are a number of crams that you
 3 reference here that you have sent or that you
 4 provided to Narconon Georgia. I don't have any
 5 copies of those. Where did those crams go, and
 6 tell me about how that worked out?
 7 **A. I wrote them, printed them out, and gave**
 8 **them to Mary. And then I sent, at least some of**
 9 **them, to Narconon International, together with**
 10 **my -- you know, my report.**
 11 **Q.** Which ones did you send to Narconon
 12 International?
 13 **A. The way I know that is because that's what**
 14 **I wrote. I don't remember. I may have sent them**
 15 **all, I may have sent some of them.**
 16 **Q.** All right. But at any rate, you gave Mary
 17 some what are called crams?
 18 **A. Correct.**
 19 **Q.** What's a cram?
 20 **A. It's a correction order.**
 21 **Q.** Yeah?
 22 **A. It's like a -- you write what you found to**
 23 **be not meeting the standards.**
 24 **Q.** Right.
 25 **A. And then list of the references from the**

<p style="text-align: center;">66</p> <p>1 Narconon materials that somebody needs to study to 2 correct it.</p> <p>3 Q. Is it -- do you -- as part of this 4 process, do you refer the center to specific HCO 5 policy letters that they're supposed to look at in 6 order to correct whatever the tech deficiency is?</p> <p>7 A. No. We refer to the Narconon training 8 materials, like the running an effective Narconon 9 supervisor course, case supervisor course, out of 10 the Narconon materials.</p> <p>11 Q. Okay. So you've got the supervisor 12 course, case supervisor course?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Running an effective Narconon?</p> <p>15 A. Uh-huh. There is an ethics service 16 course.</p> <p>17 Q. Okay. What else?</p> <p>18 A. What else. Let me think. There's how to 19 open a Narconon course, which is kind of irrelevant 20 here.</p> <p>21 Q. How to open one?</p> <p>22 A. Uh-huh.</p> <p>23 Q. That's different from how to run one?</p> <p>24 A. Yes.</p> <p>25 Q. And these are all documents that Narconon</p>	<p style="text-align: center;">68</p> <p>1 Q. And you say, "Okay, in order to get in 2 compliance with the tech, you need to look at this 3 book and do the following." Is that a fair summary 4 of the process?</p> <p>5 A. Yes.</p> <p>6 Q. And you did that here with Narconon 7 Georgia?</p> <p>8 A. Correct.</p> <p>9 Q. And you referred -- you gave them -- by 10 "them," I mean you gave Mary this list of stuff she 11 was supposed to review and to do in order to become 12 in compliance with the tech? Or that's not a good 13 way to put it. But in order to fix whatever 14 deficiency you found?</p> <p>15 A. Yes. I wrote various crams. You know, I 16 can't remember now what they were. But I mean, 17 they were not all to Mary. One may have been to 18 the person that operates the sauna. Another one -- 19 so they're -- does that make sense?</p> <p>20 Q. Makes perfect sense. 9832 says, "Attached 21 is a few more crams."</p> <p>22 A. Correct.</p> <p>23 Q. All right. So the one identified here, 24 Withdrawal, Conditions, Sequence and the 25 instruction on the TRs, those are ones that you</p>
<p style="text-align: center;">67</p> <p>1 International has in its possession? 2 MS. SHAW: Object to the form of the 3 question.</p> <p>4 A. I think.</p> <p>5 Q. Well, I mean...</p> <p>6 A. I don't know.</p> <p>7 Q. Well, where would I get them if I can't 8 get them from Narconon International? Where would 9 I be able to obtain these books?</p> <p>10 A. I'm sure you can get them from Narconon 11 International.</p> <p>12 Q. Right, because they're printed by Narconon 13 International?</p> <p>14 A. Well, they're actually printed by ABLE.</p> <p>15 Q. Okay. But they're -- fair enough. ABLE 16 has them?</p> <p>17 A. Right.</p> <p>18 Q. So basically, what you do, you come in, 19 you do the tech inspection, if you find any 20 technical deficiencies, you write a cram up?</p> <p>21 A. Correct.</p> <p>22 Q. And then in order to address the technical 23 deficiencies, you refer the center to various books 24 that you've identified for me?</p> <p>25 A. Correct.</p>	<p style="text-align: center;">69</p> <p>1 sent to -- or gave to Mary, in addition to the ones 2 that you had already given to her, right?</p> <p>3 A. I don't totally understand that question.</p> <p>4 Q. Well, I'm just trying to interpret what 5 you wrote. It looks to me like you're saying, 6 attached are a few more crams?</p> <p>7 A. Correct.</p> <p>8 Q. And then you identify four of them?</p> <p>9 A. Identify four -- no. No.</p> <p>10 Q. Well, you've attached four: Withdrawal, 11 conditions, sequence, and TRs.</p> <p>12 A. Maybe I don't understand.</p> <p>13 Q. Let's work through this together. Look at 14 your last --</p> <p>15 A. Oh, I get it. I get it, yes. Conditions. 16 Yes. Those four, obviously. I didn't understand 17 this before what it was.</p> <p>18 Q. All right. So you understand my question 19 now?</p> <p>20 A. If you would just ask it again, please.</p> <p>21 Q. Sure. It looks to me like, from your 22 email, and I'm asking you if this is correct.</p> <p>23 A. Yes.</p> <p>24 Q. It looks like you are saying in your email 25 of the 17th of June, here are four more crams.</p>

<p style="text-align: right;">74</p> <p>1 Q. Do you know?</p> <p>2 A. Yarko.</p> <p>3 Q. Yarko?</p> <p>4 A. Yes. He would know what he does with</p> <p>5 that.</p> <p>6 Q. So your involvement was, here's the way</p> <p>7 you fix the problem, and you tell Yarko. And if</p> <p>8 there's going to be any follow-up, you're assuming</p> <p>9 that Yarko would be the guy who would follow up?</p> <p>10 A. Yes.</p> <p>11 Q. Is that fair?</p> <p>12 A. Yes.</p> <p>13 Q. Fair.</p> <p>14 Now, let's go through this in a little bit</p> <p>15 of detail. Tell me what you did when you went in</p> <p>16 to inspect the facility.</p> <p>17 A. The first thing I did, I came in on a</p> <p>18 Sunday. I got some of the -- we call them folders,</p> <p>19 which is basically the charts of some of the</p> <p>20 patients, and I looked through some charts to see</p> <p>21 how the program was administered.</p> <p>22 Q. And you looked through the patient</p> <p>23 records?</p> <p>24 A. Yes.</p> <p>25 Q. The patient charts?</p>	<p style="text-align: right;">76</p> <p>1 administered, what are they doing, what are they</p> <p>2 writing, and to see what, if anything, needed to be</p> <p>3 improved.</p> <p>4 Q. How did you pick the files that you looked</p> <p>5 at?</p> <p>6 A. Completely random.</p> <p>7 Q. All right. And what did you find when you</p> <p>8 did these random reviews?</p> <p>9 A. It's pretty much described in the report.</p> <p>10 There was some things -- it's what it says in the</p> <p>11 report.</p> <p>12 Q. One of the things that I know that you</p> <p>13 noted several times -- or that you noticed in</p> <p>14 several of the folders was that some of the tech</p> <p>15 was delivered out of sequence; is that right?</p> <p>16 A. Yes.</p> <p>17 Q. And the way that it works is that when the</p> <p>18 student is enrolled in the Narconon program, there</p> <p>19 is a very specific sequence of courses that the</p> <p>20 student has to take, right?</p> <p>21 A. Yes.</p> <p>22 Q. And you can't deviate from that?</p> <p>23 A. I would say usually you don't.</p> <p>24 Q. Okay.</p> <p>25 A. It's not -- it's not never done.</p>
<p style="text-align: right;">75</p> <p>1 A. Yes.</p> <p>2 Q. Did you have any kind of HIPAA release in</p> <p>3 order to do that?</p> <p>4 A. I don't remember.</p> <p>5 Q. Well, did anybody authorize you, as a</p> <p>6 representative of Narconon Arrowhead, to look</p> <p>7 through student files?</p> <p>8 A. No.</p> <p>9 Q. Well, what was your authority for being</p> <p>10 able to go into this facility and just start</p> <p>11 looking at the patient records?</p> <p>12 A. I was representing Narconon</p> <p>13 International, --</p> <p>14 Q. All right.</p> <p>15 A. -- would be my understanding.</p> <p>16 Q. Okay. Gratuitously, right, as we said</p> <p>17 before?</p> <p>18 A. Right.</p> <p>19 Q. You weren't paid?</p> <p>20 A. No.</p> <p>21 Q. All right. So you went and you began</p> <p>22 looking around in student files?</p> <p>23 A. Yes.</p> <p>24 Q. And what was the point of doing all that?</p> <p>25 A. The point was to see how the program was</p>	<p style="text-align: right;">77</p> <p>1 Q. When can you deviate from the sequence of</p> <p>2 the courses?</p> <p>3 A. An example would be, say, a person has</p> <p>4 extreme disciplinary problems, he can't comply to</p> <p>5 the rules, he can't -- he can't stay in the</p> <p>6 program, he's always, you know, making noise, doing</p> <p>7 things he shouldn't do, we have like Book 5, 6 and</p> <p>8 7 addresses ethics, discipline. So sometimes a</p> <p>9 person may do that out of sequence.</p> <p>10 Book 3 teaches a person to study, make</p> <p>11 them more able to read, more able to study. So if</p> <p>12 they have to do something, whether they have to</p> <p>13 read a lot of things, they may do Book 3 before.</p> <p>14 Q. Okay.</p> <p>15 A. It's a decision of the case supervisor.</p> <p>16 The case supervisor is the one who dictates what is</p> <p>17 done with every single patient.</p> <p>18 Q. All right. Well, but you're criticizing</p> <p>19 Narconon of Georgia here for doing some of these</p> <p>20 courses out of sequence in this report?</p> <p>21 A. Yes.</p> <p>22 Q. And you say later in the report that</p> <p>23 you're not CS'd?</p> <p>24 A. I say I'm not trained as a case</p> <p>25 supervisor.</p>

<p style="text-align: right;">82</p> <p>1 the tech, --</p> <p>2 A. Yes.</p> <p>3 Q. -- you have an outness?</p> <p>4 A. Yes.</p> <p>5 Q. By the way, Barbara Dunn, did she come</p> <p>6 down and do the inspection with you?</p> <p>7 A. She was there. She was not doing it with</p> <p>8 me. She was -- she came to the center while I was</p> <p>9 there.</p> <p>10 Q. All right. And who does she work for?</p> <p>11 A. At the time, I really don't know who she</p> <p>12 was employed by.</p> <p>13 Q. Well, you were looking at documents at the</p> <p>14 same time that Miss Dunn was there, were you not,</p> <p>15 ma'am?</p> <p>16 A. I don't know what she was looking at.</p> <p>17 Q. Well, were you there at the same time she</p> <p>18 was at the facility?</p> <p>19 A. Yes.</p> <p>20 Q. Did you come together?</p> <p>21 A. No.</p> <p>22 Q. Were you ever in the same room together</p> <p>23 looking through folders?</p> <p>24 A. No.</p> <p>25 Q. Do you know who Miss Dunn is?</p>	<p style="text-align: right;">84</p> <p>1 A. I remember I talked to her about that she</p> <p>2 was there to do a legal rudiments inspection.</p> <p>3 Q. What's a legal rudiments inspection?</p> <p>4 A. It's a checklist to look at what -- at the</p> <p>5 legal -- the legalities of the center, you know,</p> <p>6 whether they are complying to the laws, basically.</p> <p>7 Q. And is that a written checklist?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And that's what Miss Dunn was there</p> <p>10 to do, was to do a legal rudiments checklist to see</p> <p>11 whether the center was in compliance with the law?</p> <p>12 A. They told me she was there to do a legal</p> <p>13 rudiments inspection.</p> <p>14 Q. Okay. What else did she tell you she was</p> <p>15 there to do?</p> <p>16 A. That's all.</p> <p>17 Q. All right. What was she looking at?</p> <p>18 A. I don't know.</p> <p>19 Q. Well, you were looking at files. Was she</p> <p>20 looking at the same files you were looking at, or</p> <p>21 was she looking at different files?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know who Miss Dunn works for?</p> <p>24 A. No.</p> <p>25 Q. Are you personally -- do you personally</p>
<p style="text-align: right;">83</p> <p>1 A. Yes.</p> <p>2 Q. Who is she?</p> <p>3 A. She is -- I know Miss Dunn from Narconon</p> <p>4 Arrowhead. She was there for a while.</p> <p>5 Q. Right.</p> <p>6 A. What -- I don't know who she was employed</p> <p>7 by.</p> <p>8 Q. She was there on behalf of the church,</p> <p>9 wasn't she?</p> <p>10 A. I don't know.</p> <p>11 Q. Okay. She was there at the same time that</p> <p>12 you were there doing an inspection?</p> <p>13 A. Yes.</p> <p>14 Q. She didn't work for Narconon Arrowhead,</p> <p>15 did she?</p> <p>16 A. No.</p> <p>17 Q. What was she doing?</p> <p>18 A. As far as I know, she was doing a legal</p> <p>19 rudiments inspection.</p> <p>20 Q. Okay. And how do you know that?</p> <p>21 A. Because I spoke to her.</p> <p>22 Q. Tell me what y'all talked about.</p> <p>23 A. I don't remember what we talked about.</p> <p>24 Q. You don't remember any of your</p> <p>25 conversations with Miss Dunn?</p>	<p style="text-align: right;">85</p> <p>1 know her?</p> <p>2 A. I know her from when she was at Narconon</p> <p>3 Arrowhead.</p> <p>4 Q. And she's actually affiliated with the Los</p> <p>5 Angeles org, isn't she?</p> <p>6 A. I don't know.</p> <p>7 Q. All right. You don't know anything about</p> <p>8 this lady who was there doing an inspection at the</p> <p>9 same time that you were there, other than what</p> <p>10 you've told me?</p> <p>11 A. I know who she is. I don't know who she</p> <p>12 was employed by at the time. I really don't. She</p> <p>13 came, I think, the last day I was there, and we</p> <p>14 were not there together for very -- for very long.</p> <p>15 Q. What did you see her doing?</p> <p>16 A. What did I see her doing. I mean, I saw</p> <p>17 her meeting with Mary, and I saw her looking at</p> <p>18 some papers.</p> <p>19 Q. What papers?</p> <p>20 A. I don't know.</p> <p>21 Q. Where were the papers located?</p> <p>22 A. At the desk she was sitting at.</p> <p>23 Q. Well, do you know -- I mean, did you look</p> <p>24 over and see whether it was a file or anything like</p> <p>25 that?</p>