

# **Deposition of Thomas A. Gill**

**K.H. and G.F. v. State of Washington, et al.**

**September 27, 2021**



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SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THURSTON COUNTY

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K.H., an individual; G.F., an individual,	)	
	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 19-2-06191-34
	)	
STATE OF WASHINGTON, DEPARTMENT OF SOCIAL AND HEALTH SERVICES, CHILD PROTECTIVE SERVICES, DEPARTMENT OF CHILDREN, YOUTH AND FAMILY SERVICES, governmental entities; and JANE AND JOHN DOES 1-5, individuals or entities,	)	
	)	
Defendants.	)	
	)	

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VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
UPON ORAL EXAMINATION OF  
THOMAS A. GILL

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Seattle, Washington

(All participants appeared via videoconference.)

DATE TAKEN: SEPTEMBER 27, 2021  
REPORTED BY: CINDY M. KOCH, RPR, CRR, CCR #2357

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## DEPOSITION OF THOMAS A. GILL

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1 SEATTLE, WASHINGTON; SEPTEMBER 27, 2021

2 1:04 p.m.

3 -oOo-

4 THE VIDEOGRAPHER: This is Volume I in the  
5 deposition of Thomas Gill in the matter of K.H., et al.,  
6 Plaintiffs, vs. The State of Washington, et al.,  
7 Defendants, Cause No. 19-2-06191-34 in the Superior  
8 Court of the State of Washington for Thurston County.

9 The time is now 1:04 p.m. on this 27th day of  
10 September, 2021, and we are convening via Zoom.

11 My name is Ed Burke, from Buell Realtime  
12 Reporting, LLC, located at 1325 4th Avenue, Suite 1840,  
13 Seattle, Washington 98101.

14 And if counsel and all present can please  
15 identify themselves for the record, after which the  
16 court reporter will swear in the witness.

17 MR. BROWN: Patrick Brown, on behalf of the  
18 plaintiffs.

19 THE COURT REPORTER: Is Mr. Hornbrook  
20 frozen?

21 MR. HORNBOOK: No, no. Sean Hornbrook, on  
22 behalf of the State, from the attorney general's office.

23 MR. MAYBROWN: And this is Todd Maybrown, on  
24 behalf of Mr. Gill. Mr. Gill is present in my office in  
25 Seattle, which is 600 University Street, Suite 3020,

1 Seattle, Washington 98101.

2 THOMAS A. GILL, witness herein, having been  
3 first duly sworn on oath,  
4 was examined and testified  
5 as follows:

6 E X A M I N A T I O N

7 BY MR. BROWN:

8 Q. So can you please state and spell your full  
9 name for the record, please.

10 A. My name is Thomas A. Gill, T-h-o-m-a-s, A., as  
11 in Arthur, A-r-t-h-u-r, Gill, G-i-l-l.

12 Q. And have you ever been known by any other  
13 names?

14 A. Tom A. Gill, Tom Gill. No other names than  
15 that.

16 Q. And so during these COVID times, you have a  
17 mask on at this deposition. And so before we get on the  
18 record, I asked for you to be able to take your mask off  
19 just briefly, real quick, while we're on the record, so  
20 we can get a good image of your face.

21 A. (Witness complies.)

22 Q. Thank you. You can put your mask back on.

23 And, Mr. Gill, what is your date of birth?

24 A. May 31, 1945.

25 Q. And what is your residential address?

1           A. 13032 Northeast 184th Place, Bothell,  
2 Washington 98011.

3           Q. And it's my understanding that you are  
4 currently located at Mr. Maybrown's office for this  
5 deposition?

6           A. Yes.

7           Q. And have you ever had your deposition taken  
8 before?

9           A. I don't recall ever having given a deposition  
10 before.

11          Q. Okay. So I'll go over some basic ground rules.  
12 We have a court reporter present who is transcribing  
13 everything that we're saying, so it's really important  
14 that we do not speak over each other.

15               What that means is, I'll do my best to wait for  
16 you to answer my questions before I ask my next  
17 question, and I ask that you do the same. All right?

18          A. Yes.

19          Q. And so because everything is being transcribed,  
20 it's really important that we get audible responses. So  
21 please avoid head shakes, head nods, uh-uh, uh-huh.  
22 Otherwise, the record will not be able to pick that up.  
23 Okay?

24          A. Okay.

25          Q. You may hear some objections from the

1 attorneys. All that means is, they do not like my  
2 question. You still have to answer it unless you're  
3 being instructed not to answer based on privilege.  
4 Okay?

5 A. Yes.

6 Q. If at any point you need a break, that's fine.  
7 All you have to do is ask for one. However, if there's  
8 a question pending, I will ask for you to answer the  
9 question before we break. All right?

10 A. Okay.

11 Q. And then you just took an oath; is that  
12 correct?

13 A. Yes.

14 Q. And do you understand the significance of that  
15 oath?

16 A. Yes.

17 Q. So you understand that, if you perjure  
18 yourself, there could be civil or criminal penalties?

19 A. I do now.

20 Q. And, Mr. Gill, it's my understanding that you  
21 are represented by Mr. Maybrown for purposes of this  
22 deposition?

23 A. Yes, that's correct.

24 Q. Okay. And do you know that you are not a party  
25 in this lawsuit?

1 A. That's what I understand, yes.

2 Q. And so is there a reason why you retained  
3 counsel for purposes of this deposition?

4 MR. MAYBROWN: Objection. That calls for  
5 attorney-client privilege. I also want to get rid of a  
6 message that's blocking. But objection. I'm going to  
7 instruct him not to answer about why he retained  
8 counsel.

9 BY MR. BROWN:

10 Q. Mr. Gill, are you exercising your right to not  
11 answer based on attorney-client privilege?

12 A. Yes, sir. Based on advice of counsel, I assert  
13 my rights --

14 MR. MAYBROWN: Just yes.

15 A. Thank you. Yes.

16 BY MR. BROWN:

17 Q. So, Mr. Gill, are you currently married?

18 A. Yes.

19 Q. And what's the name of your spouse?

20 A. Janice Eileen Gill.

21 Q. And how long have you and Ms. Gill been married  
22 for?

23 A. Since '73.

24 Q. And do you and Ms. Gill currently live  
25 together?

1 A. Yes.

2 Q. Do you have any other previous marriages?

3 A. No.

4 Q. Do you have any children?

5 A. Two.

6 Q. What's their name?

7 A. Nicholas Tyler and Kyle David.

8 Q. Is that Nicholas Tyler Gill?

9 A. Yes.

10 Q. And Kyle David Gill?

11 A. Yes.

12 Q. What are their date of births?

13 A. 8/6/79; that's Nick. And 2/28/80; that's Kyle.

14 No. I'm sorry. '82; that's Kyle.

15 Q. Where do they currently reside?

16 A. Woodinville.

17 Q. Do you have their addresses?

18 A. No, I don't.

19 Q. Do you have their contact information?

20 A. Do I have their what?

21 Q. Their contact information?

22 A. I --

23 Q. Phone number?

24 A. Phone number for Nick is (206) 6 -- I've got to  
25 look it up. I don't know. (206) 612-6504; that's

1 Nicholas. (206) 355-4360; that's Kyle.

2 Q. Just for the record, you obtained those numbers  
3 from your cellphone; is that correct?

4 A. Yes, that's correct.

5 Q. Are you a Washingtonian?

6 A. I wasn't born in Washington. I live here now.

7 Q. So how long have you --

8 A. Thirty years or so.

9 Q. So what year did you move to Washington?

10 A. I moved to Washington in 1972.

11 Q. And where did you move from?

12 A. Chicago.

13 Q. Is that where you're originally from?

14 A. No. I'm originally from -- well, prior -- I  
15 was at school in Chicago, and then worked. Prior to  
16 that, I lived in Portland. Prior to that, I lived in  
17 Los Angeles. Prior to that, I was born in Oakland.

18 Q. So what year did you move to Los Angeles?

19 A. When I was five. About 1950.

20 Q. Did you move there with your parents?

21 A. Yes.

22 Q. And what are your parents' names?

23 A. George Albert Gill and Betty Jane Gill.

24 Q. And are they still alive?

25 A. No.

1 Q. What year did you move to Portland?

2 A. Nineteen -- about 1953 or '54.

3 Q. And then what year did you move to Chicago?

4 A. 1966.

5 Q. Where did you attend high school?

6 A. In Portland. Sunset High School.

7 Q. What year did you graduate?

8 A. 1962.

9 Q. Did you attend any higher academic institutes  
10 after high school?

11 A. Yes.

12 Q. Which ones?

13 A. I went to Whitman College for four years in  
14 Walla Walla, Washington, and then University of Chicago  
15 for two years in Chicago.

16 Q. You said University of Illinois?

17 A. No. University of Chicago.

18 Q. Chicago.

19 So what year did you graduate from Whitman  
20 College?

21 A. '66.

22 Q. And did you graduate with a degree?

23 A. A bachelor of science degree.

24 Q. And then what year did you graduate from the  
25 University of Chicago?

1 A. '68.

2 Q. Did you graduate with a degree?

3 A. Yes.

4 Q. And in what?

5 A. Master of arts.

6 Q. Did you graduate with any minors from Whitman  
7 college or the University of Chicago?

8 A. No.

9 Q. Any other schooling, other than those two you  
10 just mentioned?

11 A. No.

12 Q. So other than your bachelor's of science and  
13 your master's of arts, did you obtain any specialized  
14 certifications?

15 A. I -- I don't -- no, I didn't. Well, to  
16 practice social work in the state of Washington, I had  
17 to get a license. Is that what you mean?

18 Q. No. But we'll -- we'll get to that in just a  
19 moment.

20 A. All right.

21 Q. So I'm more interested in your academic degrees  
22 or certifications. So other than those two -- the  
23 bachelor's of science and your master's of arts -- there  
24 are no other academic degrees or certifications --

25 A. Correct.

1 Q. -- is that correct?

2 So now go ahead and give me a thumbnail sketch  
3 of your employment history, beginning post-high school.

4 A. Well, after high school I worked for my dad,  
5 who was a builder. Then I went to the University of  
6 Chicago. When I was there, I worked at Neighborhood  
7 Center. In the summer I worked at Rezone Center. The  
8 next year I didn't work during school.

9 After school, I worked at Lake Bluff Children's  
10 Home. Then -- for two years. Then I moved to Seattle,  
11 worked in Seattle Children's Home. Then I worked at  
12 Children's Home Society Cobb Center, and then Children's  
13 Home Society in a different department, and then in  
14 private practice.

15 Q. And I believe I heard you say you worked for  
16 Lake Bluff Children's Home?

17 A. Yes.

18 Q. And where was that located?

19 A. Lake Bluff, Illinois.

20 Q. And what was your position there?

21 A. Social worker.

22 Q. And I believe I heard you say you worked for  
23 Rezone Center?

24 A. Yes.

25 Q. What was that?

1 A. Mental health center in Chicago.

2 Q. What was your position?

3 A. Social worker.

4 Q. Then you mentioned Neighborhood Center?

5 A. Yes.

6 Q. What was that?

7 A. That was also in Chicago. That's like a -- it  
8 would be equivalent to a boys and girls club perhaps,  
9 something like that here, and I was there as a group  
10 worker.

11 Q. What did it mean to be a group worker for the  
12 Neighborhood Center?

13 A. I'm sorry; I didn't hear you.

14 Q. What did it mean to be a group worker for the  
15 Neighborhood Center?

16 A. Oh, that means that you had a group that you  
17 met with weekly or more often.

18 Q. Other than meeting with a group, what else did  
19 you have to do?

20 A. When they had events at the center, I was often  
21 there as part of a chaperoning group.

22 Q. And how old were the boys and girls at the  
23 Neighborhood Center?

24 A. From all -- kindergarten through high school.

25 Q. And did you need a specialized license or

1 certification to be a group worker for the Neighborhood  
2 Center?

3 A. No.

4 Q. Did you need any -- or strike that.

5 Did you need a specific qualification to be a  
6 group worker for the Neighborhood Center?

7 A. No.

8 Q. And so for how long did you work at the  
9 Neighborhood Center?

10 A. I think about a year.

11 Q. Do you recall who hired you?

12 A. Well, no. I have no idea.

13 Q. Do you recall who you reported to?

14 A. Probably the same person that hired me. I  
15 don't know, no.

16 Q. And so other than being a chaperone for the  
17 boys and girls at the Neighborhood Center, did you  
18 provide any other services for those children that were  
19 there?

20 A. Well, group time.

21 Q. So what is group time?

22 A. Group time would be just getting together,  
23 maybe playing basketball, maybe talking, maybe talking  
24 about things that were problematic, talking about  
25 future.

1 Q. Did you provide any counseling services?

2 A. I don't know if they'd be called counseling  
3 services or not, but nothing other than with the group.

4 Q. And do you remember the name of any coworkers,  
5 if you had any?

6 A. No, I don't.

7 Q. And did you leave Neighborhood Center on your  
8 own volition, or were you terminated?

9 A. I left on my own volition.

10 Q. Tell me about the Rezone Center. What type of  
11 mental health center was it?

12 A. It was a mental health center for -- at least  
13 for children. I don't know if they also worked with  
14 adults or not. It had a day treatment program and  
15 outpatient counseling program for children and youth.

16 Q. And how old were the children that were at the  
17 Rezone Center?

18 A. Young through high school.

19 Q. What do you mean by "young"?

20 A. Well, I don't know how young they all came --  
21 always came in, but at least kindergarten age.

22 Q. And what type of mental health issues were  
23 these children dealing with?

24 A. You know what? I really don't recall in any  
25 detail what that would be, what those would be.

1 Q. And what was your -- strike that.

2 You testified that you were a social worker at  
3 the Rezone Center; is that right?

4 A. Yes, that's correct.

5 Q. Okay. And what did it mean to be a social  
6 worker?

7 A. That would mean that, when children were  
8 initially referred, I would meet with them and generally  
9 with their families, find out what the referral was for,  
10 and I think write up those notes, and I think that's  
11 all. No, that isn't all. Then some children I saw  
12 afterwards, after they first -- after their initial  
13 entrance, like weekly or twice weekly in counseling  
14 sessions.

15 Q. Did you need any special qualifications to be a  
16 social worker?

17 A. Well, I was in the midst of getting my master's  
18 degree. That's the reason I was hired there.

19 Q. So when you were hired as a social worker, you  
20 only had a bachelor's degree?

21 A. I had a bachelor's degree and one year in  
22 graduate school.

23 Q. Do you recall who hired you at the Rezone  
24 Center?

25 A. No.

1 Q. Do you recall who you reported to at the Rezone  
2 Center?

3 A. Somebody named Don. I can't remember his last  
4 name.

5 Q. And what was Don's position?

6 A. Well, he supervised -- I think there were three  
7 of us who were students there, me and two others, and  
8 his -- his responsibility was to supervise us.

9 Q. Who were the two other students that were with  
10 you there?

11 A. I'm not remember- -- Otha Spencer was one, and  
12 the other, I don't remember her name.

13 Q. Did you say Otha Spencer?

14 A. O-t-h-a.

15 Q. Did you have to apply for that position as a  
16 social worker at the Rezone Center?

17 A. Yes.

18 Q. And was that part of your schooling, or was  
19 that something you did independently?

20 A. Independent.

21 Q. Did you have any prior experience working with  
22 children who had mental health problems?

23 A. No.

24 Q. Once you were hired at the Rezone Center, did  
25 you receive any training from the Rezone Center as to

1 how to deal with children who had mental health  
2 problems?

3 A. That was our -- that was our -- I'm sorry.  
4 That was our supervisor's job, to also be a teacher.

5 Q. And so did that in fact happen, where your  
6 supervisor provided you with training?

7 A. Yes.

8 Q. So tell me about that training. What happened  
9 exactly during the training?

10 A. Oh, gosh, I can't remember really. You know,  
11 we'd talk about cases, that -- that is, people I was  
12 seeing as a therapist, and he would comment on what I  
13 told him and make suggestions. That's as specific as I  
14 can get.

15 Q. Part of your role as a social worker for the  
16 Rezone Center, did you have to create daily logs?

17 A. I -- actually, I can't remember. I don't know.  
18 I don't know if I had to make notes of the sessions or  
19 not.

20 Q. Did you have a designated caseload?

21 A. I would guess I did.

22 MR. MAYBROWN: Objection.

23 I would ask you not to guess.

24 BY MR. BROWN:

25 Q. Okay. I'm just asking for your best estimate.

1 I mean, you had a caseload. Do you believe you had one?

2 A. I don't know. I had two or three or four cases  
3 assigned, some of the intake, and that's all that I can  
4 remember.

5 Q. So is it your memory, then, that you had  
6 approximately two to three cases assigned to you?

7 A. I think that's accurate.

8 Q. And who assigned the cases to you?

9 A. I don't know.

10 Q. So you don't know if it was your supervisor,  
11 Don, who assigned the cases to you?

12 A. Well, he may -- he probably had something to do  
13 with the assignments, but they were probably assigned by  
14 someone else that worked there.

15 Q. So if you had two to three cases assigned to  
16 you at a time, did you also receive the individuals' --  
17 or strike that.

18 Did the children who were staying at the Rezone  
19 Center have case files?

20 A. Two files?

21 Q. Case files.

22 A. I'm -- yes, they had case files.

23 Q. And was it part of your roles and  
24 responsibility to create notes and to add those to the  
25 case file?

1           A. That's what I said. I can't remember if I had  
2 to do that or not.

3           Q. Do you recall the names of anyone else who  
4 worked with you at the Rezone Center?

5           A. No, I don't.

6           Q. And then what year did you leave the Rezone  
7 Center?

8           A. I only worked there in the summer, 1967.

9           Q. Why did you leave?

10          A. Well, it was probably August or September. I  
11 can't tell you for sure. I don't know.

12          Q. Do you recall the reason why you left the  
13 Rezone Center?

14          A. Yeah. It was the end of summer, end of that  
15 particular job, and I was going back to school.

16          Q. So it was more of a seasonal -- seasonal  
17 position?

18          A. As I recall, yes.

19          Q. What year did you start working at the Lake  
20 Bluff Children's Home?

21          A. Just a minute. 1968.

22          Q. And for the record, it looks like you are  
23 referring to a document for those dates?

24          A. Yes, I am. It's my résumé.

25               MR. BROWN: So I'm going to actually ask

1 your counsel to provide my office with a copy of that,  
2 and we'll actually mark your résumé as Exhibit 1 to your  
3 deposition.

4 MR. MAYBROWN: Are you asking for it now, or  
5 are you asking for it at the close of business today?

6 MR. BROWN: We can do it maybe over the  
7 course over a break.

8 MR. MAYBROWN: Okay. We can -- we can  
9 accommodate that.

10 BY MR. BROWN:

11 Q. What was Lake Bluff Children's Home?

12 A. It was a counseling and group home  
13 organization.

14 Q. Was it a counseling and group home for  
15 juveniles?

16 A. At least the group homes were. Now, whether  
17 the counseling was all or not, I don't know.

18 Q. So were there two separate entities under the  
19 umbrella of the Lake Bluff Children's Home?

20 A. Yes.

21 Q. So which part of that were you working with?

22 A. Primarily the group homes.

23 Q. And so you were working with juveniles then; is  
24 that right?

25 A. That's correct.

1 Q. And what was your title when you began working  
2 for the group home involving Lake Bluff Children's Home?

3 A. Casework therapist.

4 Q. What did it mean to be a casework therapist?

5 A. I met with the -- the house parents of each of  
6 three group homes once or twice a week, answered  
7 questions, helping them understand what was -- what was  
8 happening with the kids they were taking care of, and  
9 met with the kids once a week, maybe more often, but I  
10 think probably just once a week also.

11 Q. And who hired you at Lake Bluff Children's  
12 Home?

13 A. I think Dale Brown.

14 Q. Who was Dale Brown?

15 A. He was a supervisor at Lake Bluff.

16 Q. Did Lake Bluff Children's Home have something  
17 like a headquarters?

18 A. I -- I'm not sure. They were located in at  
19 least two different places. One was in Lake Bluff --  
20 although the children's home itself was closed down --  
21 and the other was in downtown Chicago, and I believe  
22 that's where the headquarters was.

23 Q. And where was the group home that you were  
24 working at located?

25 A. In the Chicago area.

1 Q. Was Dale Brown working there in that same group  
2 home?

3 A. No. I believe Dale Brown supervised me.

4 Q. Where was his physical office?

5 A. Well, I'm not sure. I think it was downtown,  
6 but I can't tell you for sure. I don't know. Seems to  
7 be that he left shortly after he hired me.

8 Q. Do you know who took over his position?

9 A. Grace Freeman.

10 Q. Do you know how to spell the last name?

11 A. F-r-e-e-m-a-n.

12 Q. Where was Mr. Freeman's office located?

13 A. I think it was located in the same building in  
14 Chicago.

15 Q. And so this was a different building than where  
16 you were located?

17 A. I don't believe so.

18 Q. So it was the same building that you were  
19 located in?

20 A. I think that's correct.

21 Q. As a casework therapist, were you working out  
22 of an office or were you working in the field?

23 A. Out of an office.

24 Q. And how often would you be in the field at the  
25 group home?

1 A. How often would I be at the group home itself?

2 Q. Correct.

3 A. Oh, two or three times a week.

4 Q. What were your roles and responsibilities as a  
5 casework therapist?

6 A. Therapy for the kids, and supervision and  
7 consultation with the house parents.

8 Q. What type of therapy did you provide to the  
9 children?

10 A. Pardon me?

11 Q. What type of therapy did you provide to the  
12 children?

13 A. Social work therapy, talking therapy.

14 Q. So what is talking therapy?

15 A. Well, I'm -- I'm not sure how to answer your  
16 question, sir.

17 Q. Can you tell me exactly what you did during the  
18 talking therapy sessions?

19 A. Sure, more or less. A client would come in.  
20 I'd say, "Hello. How are things going? What's  
21 happening?"

22 They'd talk about whatever they talked about.  
23 Whatever they talked about, then I would comment on and  
24 see if I could be helpful.

25 Q. So were these children talking about their

1 everyday struggles, or what was the nature of those  
2 talking therapy sessions?

3 A. All different kind of things. No particular  
4 nature.

5 Q. Can you give me an example of something?

6 MR. MAYBROWN: Objection.

7 A. No.

8 MR. MAYBROWN: Objection. Insofar as you're  
9 calling for specific information about specific clients,  
10 I'd object. I'd instruct him not to answer without a --  
11 without a release or some other authorization.

12 BY MR. BROWN:

13 Q. Okay. And I'm not asking for any specific  
14 information or specific session with a specific child.  
15 I'm just talking about in general, what's the nature of  
16 some of the topics?

17 MR. MAYBROWN: I'm going to object as  
18 irrelevant. This is back in Illinois at a time that has  
19 nothing to do with the lawsuit.

20 MR. BROWN: Okay. Counsel, you can keep --  
21 you can keep your objections to form, please, and stop  
22 coaching your witness.

23 MR. MAYBROWN: I can make a record. I'm not  
24 coaching anybody. I can make a record, and I'm just  
25 saying it's irrelevant and it has nothing to do with

1 anything that happened in the state of Washington.

2 BY MR. BROWN:

3 Q. Okay. So please answer my question, Mr. Gill.

4 A. Ask your question again, please.

5 Q. Can you give me an example of what the nature  
6 was of some of those talking therapy sessions?

7 A. Yes. For example, having trouble in school  
8 with other -- other students.

9 Q. And so Lake Bluff Children's Home, that was a  
10 group home for children; right?

11 A. Yes.

12 Q. So did the children permanently reside there?

13 A. They would reside there for some time.

14 Q. And why were they living there at Lake Bluff  
15 Children's Home?

16 A. For some reason or other, they couldn't live at  
17 home.

18 Q. Were they wards of the State, or dependents?

19 A. I don't know if they all were. Some, I believe  
20 were.

21 Q. And what was the -- the general background of  
22 some of the children who were living there at Lake Bluff  
23 Children's Home?

24 A. You know what? I -- I can't tell you. I can't  
25 remember.

1 Q. Did any of the children struggle with mental  
2 health?

3 A. Did any of them what?

4 Q. Struggle with mental health?

5 A. Well, there were mental health issues, yes.

6 Q. Did any of the children have a criminal  
7 background?

8 A. I don't recall.

9 Q. Did all the children have mental health  
10 problems?

11 A. I can't say yes or no to that either. I don't  
12 recall.

13 Q. Did you have to report to anyone else, other  
14 than Dale Brown and Grace Freeman?

15 A. No. Well, yes. When I was getting ready to  
16 leave, I had to report to the director.

17 Q. Who was that?

18 A. I can't remember his name.

19 Q. And when you say you were getting ready to  
20 leave, did you mean leave your employment with Lake  
21 Bluff Children's Home?

22 A. That's what I mean, yes.

23 Q. And what year was that?

24 A. 1970.

25 Q. Were you still a casework therapist when you

1 left in 1970?

2 A. Yes.

3 Q. And why did you leave your employment with Lake  
4 Bluff -- strike that.

5 Why did you leave your employment with Lake  
6 Bluff Children's Home?

7 A. I wanted to live in the Northwest and got a job  
8 in Seattle.

9 Q. And why did you want to live in the Northwest?

10 A. That's where I'm from. That's where I mostly  
11 grew up.

12 Q. But why Seattle specifically?

13 A. I knew people in Seattle. It was either  
14 Seattle or Portland, and Seattle is the first place that  
15 had a job for me.

16 Q. And so what job was that, that you --

17 A. It was --

18 Q. -- accepted?

19 A. Pardon me?

20 Q. What was that first job you accepted in  
21 Seattle?

22 A. That was social work therapist at Seattle  
23 Children's Home.

24 Q. What was Seattle Children's Home?

25 A. It was a residential treatment center.

1 Q. For juveniles or adults?

2 A. Juveniles.

3 Q. And what do you mean by it being a residential  
4 facility?

5 A. That means that youth and children who could  
6 not be successfully or were not successfully treated  
7 while they lived at home, they're there for a period of  
8 time.

9 Q. So did you begin your employment with Seattle  
10 Children's Home in 1970?

11 A. Yes, that's correct.

12 Q. Do you recall who hired you?

13 A. Elizabeth Toth and Joe O'Coyne.

14 Q. Can you spell that last name of Joe?

15 A. O, apostrophe, C-o-y-n-e.

16 Q. What was Elizabeth Toth's title?

17 A. She was the director.

18 Q. And what about Joe O'Coyne?

19 A. Assistant director.

20 Q. And with you moving to Washington State to work  
21 in Seattle, did you need a specialized certification or  
22 license to be a social worker?

23 A. No.

24 Q. Did you need certain qualifications to be a  
25 social worker in Seattle?

1 A. Only as required by the agency, I think.

2 Q. And do you know what those qualifications were?

3 A. Well, I would be guessing, so I don't know for  
4 certain.

5 Q. To the best of your knowledge, what were those  
6 qualifications?

7 A. Master's degree in social work.

8 Q. And did you have a master's degree in social  
9 work?

10 A. That's the MA degree that I got from the  
11 University of Chicago. Yes.

12 Q. So after you were hired as a social worker for  
13 Seattle Children's Home, did you have to undergo any  
14 training?

15 A. No.

16 Q. Did you receive any policies and procedures?

17 A. I'm sure we did. I don't know what we -- you  
18 know, the -- the -- there must have been something  
19 because you spent -- yes. But I don't know what they  
20 were.

21 Q. Did you have to attend, for example, like an  
22 orientation class or orientation day when you first  
23 began your employment?

24 A. No.

25 Q. So after you were hired, you received your

1 employment package, and part of that package, you had  
2 policies and procedures?

3 A. Probably.

4 Q. And what was your understanding as to what  
5 Seattle Children's Home was compared to the --

6 A. Compared to what?

7 Q. Compared to the Lake Bluff Children's Home in  
8 Chicago.

9 A. Probably a step up in terms of difficulty of  
10 the clients.

11 Q. What do you mean by that?

12 A. More difficult clients, more disturbed clients.

13 Q. At Seattle Children's Home?

14 A. Yes.

15 Q. And what do you mean by that, that they were  
16 more disturbed?

17 A. That means, for example, more acting out.

18 Q. How were they acting out?

19 A. For instance, temper tantrums.

20 Q. Did you receive any training on how to deal  
21 with the youth who were more disturbed than what you  
22 were familiar with?

23 A. No. Not particular training.

24 Q. Did that concern you?

25 A. No.

1 Q. Why not?

2 A. I -- because what I was -- because I was being  
3 supervised by somebody with many years of experience.

4 Q. And who was supervising you?

5 A. Joe O'Coyne.

6 Q. And where was the physical location of Seattle  
7 Children's Home?

8 A. Queen Anne Hill.

9 Q. What was the setup of Seattle Children's Home?

10 A. There were two units -- one for younger  
11 children, boys, and one for older boys, youth -- and an  
12 office building that also included a day treatment  
13 program.

14 Q. Did you have an office?

15 A. Yes.

16 Q. Where was that located?

17 A. In the office building.

18 Q. And what were your roles and responsibilities  
19 at Seattle Children's Home?

20 A. Therapist for the children, some of the  
21 children in one of the units, and therapist for their  
22 parents, and supervisor for the staff.

23 Q. Were you hired as a supervisor for the staff?

24 A. That's part of the job I was hired for, yes.

25 Q. What type of therapy did you provide to the

1 children?

2 A. Pardon me?

3 Q. What type of therapy did you provide to the  
4 children?

5 A. Same as I described before. Talking therapy.  
6 In some cases, play therapy.

7 Q. And the children who were placed at Seattle  
8 Children's Home, were these individuals who were placed  
9 there by the State of Washington?

10 A. I believe some of them were. I believe some of  
11 them were not.

12 Q. And so the children who were placed there by  
13 the State of Washington, were they, to your knowledge,  
14 wards of the State?

15 A. I don't know.

16 Q. And do you know what I mean by the term "ward  
17 of the State"?

18 A. Yeah, I believe so.

19 Q. Is that --

20 A. So what I -- go ahead.

21 Q. What do you understand a ward of the State to  
22 be?

23 A. Oh, what I understand is that years later,  
24 inasmuch as the State was paying for residential  
25 treatment, they required -- the State required that the

1 children be wards of the State. Now, what that means  
2 exactly, I don't know, except that the State was  
3 somewhat in -- somehow in charge of them.

4 Q. So to your knowledge, then, Seattle Children's  
5 Home was a State-licensed facility?

6 A. I imagine it was. I don't know for sure, but  
7 I'm -- I imagine it was.

8 Q. And do you remember the names of any other  
9 staff members who worked at Seattle Children's Home?

10 A. No. No, I don't.

11 Q. What about the names of any residents who were  
12 placed at Seattle Children's Home?

13 A. I don't think I can give you that information.

14 Q. Is that because you do not recall that  
15 information?

16 MR. MAYBROWN: I think it's covered by  
17 privilege. He might recall.

18 You can say yes or no whether you recall,  
19 but --

20 A. No, actually, at this point I do not recall  
21 anyone who was there -- any of the children who were  
22 there. If I did, it would still be by privilege that I  
23 couldn't answer.

24 BY MR. BROWN:

25 Q. Okay. And so I'll represent to you that the

1 State of Washington and Plaintiffs, we have a protective  
2 order in place that protects that information so those  
3 names are covered and they can be disclosed.

4 MR. MAYBROWN: I'm going to say that we have  
5 no knowledge of any agreement you have with the State of  
6 Washington. Mr. Gill's not a party to the case, and  
7 without a release or other legal authorization, he's not  
8 going to provide any specific information regarding any  
9 patient.

10 MR. BROWN: Okay. Well, as this deposition  
11 proceeds, and if there's any names that do come to  
12 Mr. Gill's mind and he does not want to disclose those,  
13 then we will have to get the Court involved.

14 Because I'll represent to you, as I mentioned,  
15 that there's a court order -- protective --  
16 court-ordered protective order in place that protects  
17 those names, and those names are discoverable.

18 MR. MAYBROWN: Well, you know, we're not  
19 parties. You didn't give us any information. So if  
20 you're going to claim on the record here you have  
21 information, you should have shared it with us before  
22 the deposition, but we don't have that.

23 MR. BROWN: Okay. And I'm happy to send you  
24 a copy of the protective order during the break.

25 MR. MAYBROWN: Well, I'm not going to read

1 it over the break. If you have legal authorization, you  
2 should give it to us in advance. That's the way people  
3 usually would handle a deposition.

4 MR. BROWN: So, Mr. Maybrown, you're saying  
5 you want to waste the Court's time by calling the Court  
6 to verify the protective order?

7 MR. MAYBROWN: No. I'm going to say you --  
8 you shouldn't have wasted our time by not giving us  
9 directions and guidelines before the deposition, is what  
10 I'm saying.

11 And he's not going to -- Mr. Gill's not going  
12 to provide any information that would be covered by  
13 privilege because he's not party to any stipulation or  
14 protective order.

15 MR. BROWN: Okay. And a name -- a name is  
16 not privileged.

17 So I'm going to continue now --

18 MR. MAYBROWN: Well, we'll go question by  
19 question, but I'm saying he's not going to provide any  
20 specific information regarding any patient or any  
21 treatment.

22 BY MR. BROWN:

23 Q. For how long did you work at Seattle Children's  
24 Home?

25 A. I worked there from September '70 through

1 February '74.

2 Q. Why did you leave in 1974?

3 A. Work at Children's Home Society, Cobb Center.

4 Q. So did Cobb Center and Seattle Children's Home  
5 group home have any connections?

6 A. No.

7 Q. Okay. So when you worked for Cobb Center, you  
8 were not working for the same employer?

9 A. That's correct.

10 Q. So when you left Seattle Children's Home, you  
11 left on your own volition, or were you terminated?

12 A. I left of my own volition.

13 Q. And did you learn of the position, of the  
14 opening at Cobb Center, while you were still working for  
15 Seattle Children's Home?

16 A. Yes.

17 Q. And how did you learn of that position?

18 A. Because Dale Brown, who was the person that had  
19 hired me at Lake Bluff, was then working at Children's  
20 Home Society, Cobb Center. They were starting a new  
21 program, and he invited me to observe what -- well, to  
22 observe what they were planning.

23 Q. What was that new program?

24 A. I'm sorry?

25 Q. What was that new program that they were

1 implementing at Cobb Center?

2 A. Well, it was one in which the therapist was  
3 located in the residential unit rather than separate,  
4 and in which the staff had more responsibility for  
5 caring for the kids than at Seattle Children's Home.

6 Q. Was it Dale Brown who hired you at Cobb Center?

7 A. No. I think it was Norm Mattern.

8 Q. Can you spell that last name?

9 A. M-a-t-t-e-r-n.

10 Q. Who was Norm Mattern?

11 A. Director.

12 Q. He was the director of Cobb Center?

13 A. He was the director of the Northwest branch of  
14 Children's Home Society. There were six or seven  
15 branches throughout the state. One of them was in  
16 Seattle, called the Northwest branch, and he was  
17 director of that branch.

18 Q. So you were hired then in 1974 at Cobb Center?

19 A. Well, yes, that's correct.

20 Q. So in 1974, did you understand Cobb Center to  
21 be a sub-entity or a subdivision of a larger  
22 organization?

23 A. You mean of Children's Home Society? Yes.

24 Q. Correct. Okay.

25 And so just to clarify, though, Seattle

1 Children's Home was not part of Children's Home Society;  
2 is that right?

3 A. Correct.

4 Q. When you were working at Cobb Center, who did  
5 you have to report to?

6 A. To Dale Brown.

7 Q. And what was Dale Brown's title at Cobb Center?

8 A. Supervisor at Cobb Center. I don't know  
9 exactly what his title was, but he was in charge of the  
10 three units at Cobb Center.

11 Q. What do you mean by three units at Cobb Center?

12 A. There were three buildings where children or  
13 youth lived, three separate buildings, and Dale Brown  
14 was in charge of the programs in each of those three  
15 buildings.

16 Q. Did the three buildings have a name?

17 A. Cottage A, Cottage B, and Cottage C.

18 Q. And Dale Brown was the supervisor of all three  
19 cottages?

20 A. That's correct.

21 Q. Did you work in a specific cottage?

22 A. Cottage A.

23 Q. And were these cottages distinguishable from  
24 each other?

25 A. Well, they were separate buildings.

1 Q. Okay. What about the residents who resided in  
2 those cottages?

3 A. No.

4 Q. And so it didn't matter what the resident's  
5 background was or their current situation was; they were  
6 just placed in a cottage that had an opening?

7 A. They were placed in the cottage that, A, had an  
8 opening, and B, the staff felt they could be helpful to.

9 Q. And how old were the children who were staying  
10 at Cobb Center?

11 A. Probably -- I'm -- I can't tell you for sure.  
12 Probably six or seven up to thirteen or fourteen.

13 Q. And do you know if the children who were  
14 staying at Cobb Center were wards of the State?

15 A. I don't know for certain, but I believe they  
16 were.

17 Q. And do you believe that all the children who  
18 were placed at Cobb Center were wards of the State?

19 A. As I said, I don't know.

20 Q. Did any State employee ever come to Cobb  
21 Center?

22 A. I believe there was someone from the Department  
23 of Social & Health Services that came maybe once a year  
24 to inspect.

25 Q. Do you recall the name of that State employee?

1 A. Oh, good heavens, no.

2 Q. What do you mean by State employee coming to  
3 Cobb Center to inspect it?

4 A. Well, whatever the rules from the State were.  
5 Like you -- every employee had to have a food handler's  
6 permit, as an example. So they'd come and make sure  
7 every employee had a food handler's permit.

8 Q. Other than ensuring that the Cobb Center  
9 employees had a food handler's permit, what else did the  
10 State employee inspect?

11 A. The facility, I believe. You know, did it look  
12 clean? Was it taken care of properly and that sort of  
13 thing, is the best of my recollection.

14 Q. So the State employee inspected the physical  
15 plant of Cobb Center; is that right?

16 A. That's kind of what my understanding was.

17 Q. Do you know if the State employee spoke to any  
18 of the children who were placed at Cobb Center?

19 A. I don't know.

20 Q. Do you know if the State employee spoke to any  
21 of the employees of Cobb Center?

22 A. I'm sure they did. Because that would be the  
23 way that they would get around in the -- in the -- each  
24 building. I don't know if they -- I don't know what  
25 questions they asked them.

1 Q. To the best of your memory, did a State  
2 employee ever speak with you directly about Cobb Center?

3 A. Not to the best of my memory.

4 Q. And do you know if the State then provided  
5 something like an annual audit report?

6 A. I -- I don't know for certain. I suspect they  
7 did.

8 Q. And to the best of your knowledge, the State  
9 inspected Cobb Center, the physical plant, to determine  
10 whether the facility was in compliance with State  
11 standards to maintain its license; is that correct?

12 A. At least that, yes.

13 Q. Okay. And do you know if the State made an  
14 effort to determine whether Cobb Center was a safe place  
15 to place children?

16 A. I don't know how to answer that. I don't know.  
17 I, again, would expect that they did, but I don't know.

18 Q. But would you agree with me, though, that if  
19 the State didn't ask a child who was placed at Cobb  
20 Center, for example, "Hey, do you feel safe here," the  
21 State wouldn't know; is that right?

22 MR. HORN BROOK: Objection to form.

23 Go ahead and answer, please.

24 A. Oh, okay. I -- I don't know if there were  
25 other ways to gather that information, so I can't

1 answer. I don't know.

2 BY MR. BROWN:

3 Q. By the way, how did it work with a child being  
4 placed at Cobb Center? Were they dropped off by someone  
5 with the State?

6 A. No. Generally -- well, sometimes, but most  
7 often by their families, their parents.

8 Q. So was there an intake process?

9 A. Yes.

10 Q. What did that look like?

11 A. Well, the first part of the intake process was  
12 to read the record, or read whatever the referral was.  
13 And then that was -- if that passed Dale Brown or --  
14 well, passed Dale Brown, then it was sent to the  
15 cottages or the cottage that had an opening and was  
16 again reviewed by the staff and the supervisor of the  
17 cottage.

18 And if there -- if the -- the -- the agreement  
19 was, yes, that child can probably be helped with us,  
20 then whatever contact had to be made would be made, and  
21 arrangements made for them to move in.

22 Q. And when you say that part of the intake  
23 process was to read the referral, you're referring to  
24 the State's referral?

25 A. I believe that's where the referrals all came

1 from.

2 Q. And again, just to clarify, it's the State  
3 sending a referral for Cobb Center to accept the  
4 placement of a ward of the State?

5 A. Well, I -- I can't tell you. I don't know.  
6 That would, again, be my guess, but I don't know.

7 Q. And what did a typical day look like at Cobb  
8 Center for the residents?

9 A. What did a typical day look like?

10 Q. Right.

11 A. Get up in the morning, get dressed, eat  
12 breakfast, be ready for school, catch the school bus, go  
13 to school, come home from school. Come in, get a snack.  
14 Play. Then dinnertime. After dinner, study hour, and  
15 then bed. Well, study hour and then a little bit of TV,  
16 and then bed.

17 Q. When would you provide the speaking therapy  
18 sessions?

19 A. When they were home from school.

20 Q. Okay. So this would have been sometime in the  
21 afternoon?

22 A. Correct.

23 Q. How many sessions per week did each resident  
24 have?

25 A. Most of the time, two.

1 Q. And did you have a designated caseload?

2 A. Yeah. All the students in -- all of the  
3 residents in Cottage A.

4 Q. And how many residents were placed in Cottage A  
5 at a time?

6 A. Eight.

7 Q. So you provided speaking therapy sessions to  
8 all eight residents in Cottage A?

9 A. Yes, correct.

10 Q. Was there someone else who provided speaking  
11 therapy to the residents in Cottage B?

12 A. Correct.

13 Q. Who was that?

14 A. Robert Jones.

15 Q. And what was Robert Jones' title?

16 A. Same as mine. Unit supervisor, Cottage B  
17 supervisor.

18 Q. And who provided speaking therapy sessions in  
19 Cottage C?

20 A. I don't remember the guy's name. John  
21 something. And his -- his title was the same.

22 Q. By the way, when did your employment with Cobb  
23 Center end?

24 A. In December 1980.

25 Q. From 1974 up until 1980, you were providing

1 speaking therapy sessions in Cottage A.

2 A. Correct.

3 Q. Robert Jones was providing speaking therapy  
4 sessions in Cottage B.

5 A. Correct.

6 Q. And John Doe was providing speaking therapy  
7 sessions in Cottage C?

8 A. Correct.

9 Q. To your knowledge, were there any other  
10 therapists or social workers who worked at Cobb Center  
11 during that time period?

12 A. None to my knowledge.

13 Q. Okay. Do you recall the names of any other  
14 staff members who worked at Cobb Center?

15 A. Yes. One. Judy Chinella.

16 Q. And who was that?

17 A. One of the people who worked in my cottage.

18 Q. What was her title?

19 A. Residential -- let's see -- counselor.  
20 Residential counselor.

21 Q. What's your understanding of a residential  
22 counselor?

23 A. Those were -- there were six of them in each  
24 cottage, and they took care of the kids. They cooked;  
25 they cleaned; they did laundry; they talked to them;

1 they watched them, supervised them; so on and so on and  
2 so on.

3 Q. Do you recall the names of the other residents  
4 or counselors?

5 A. No, I didn't -- I don't.

6 Q. So other than you, Mr. Gill, and Judy Chinella,  
7 who else worked in Cottage A?

8 A. There were five other resident counselors and  
9 one person called night staff who stayed every night.

10 Q. And what were their names?

11 A. That -- I told you, I don't know. I can't  
12 remember.

13 Q. Between 1974 and 1980, did Cobb Center have a  
14 reporting process in place?

15 A. Reporting to whom?

16 Q. To anyone. For example, if there were any  
17 concerns for the safety of a child who was placed at  
18 Cobb Center, was there some type of reporting process or  
19 reporting system --

20 A. Yes. You'd -- I'm sorry. Yes. You would  
21 report to your supervisor or our supervisor, which would  
22 have been Dale Brown.

23 Q. And would that be an oral report or a written  
24 report?

25 A. More than likely oral, at least to begin with.

1 Q. Okay. And what do you mean by at least to  
2 begin with it was oral?

3 A. Well, if there was a problem -- a serious  
4 problem, like abuse of someone, of a child, then  
5 probably that would have been put into writing. I'm not  
6 aware of any such reports, but I'm guessing that's what  
7 would have happened.

8 Q. So for example, if there was an incident that  
9 had occurred at Cobb Center, Cobb Center would have  
10 created an incident report?

11 A. That's what I think is correct.

12 Q. Okay. Do you know what would have happened  
13 with those incident reports?

14 A. They would have gone to the supervisor of Cobb  
15 Center. And after that, I don't know.

16 Q. Were you required to report any incidents to  
17 the State of Washington?

18 A. I don't know.

19 Q. Okay. And so to your knowledge, though, you  
20 have never reported anything to the State of Washington  
21 during your time between 1974 and 1980 at Cobb Center?

22 A. Right.

23 Q. Did Cobb Center ever explain to you what --  
24 strike that.

25 To your knowledge, what would have been

1 reportable incidents that required you to report it to  
2 the State of Washington?

3 A. I don't know.

4 Q. And you don't know because the State of  
5 Washington never informed you what you should be  
6 reporting?

7 A. No. Because that would have been the  
8 supervisor's decision or job, more than mine.

9 Q. So do you --

10 A. What I was required to report to the State was  
11 periodic reports on the progress -- progress reports on  
12 each youngster that I was -- that was in the cottage.

13 Q. So you would send progress reports to the State  
14 of Washington for each individual who you counseled in  
15 Cottage A?

16 A. Correct.

17 Q. And how often would you send those progress  
18 reports?

19 A. I believe they were due quarterly.

20 Q. Do you know what a mandatory reporter is?

21 A. Do I know what what?

22 Q. A mandatory reporter is?

23 A. Oh, yes. Of course.

24 Q. Okay. And so what do you understand a  
25 mandatory reporter to be?

1           A. If certain incidents happen, we're required to  
2 report them to -- I'm not sure whom, the police -- to  
3 the police, I believe.

4           Q. And so when you were working as a social worker  
5 for Cobb Center, were you considered to be a mandatory  
6 reporter?

7           A. Yes.

8           Q. Okay. Do you recall having to report any  
9 incidents occurring at Cobb Center to law enforcement?

10          A. No.

11          Q. Part of that mandatory reporting process, would  
12 that have required you -- required you to report, for  
13 example, child abuse to CPS?

14          A. That would have been required, yes.

15          Q. To the best of your memory, you have never  
16 informed CPS of any type of abuse occurring at Cobb  
17 Center; is that right?

18                 THE COURT REPORTER: I didn't hear an  
19 answer.

20          A. Correct.

21 BY MR. BROWN:

22          Q. So when you began your employment in 1974, did  
23 anyone go over what incidents or what behavior is  
24 reportable to CPS and/or law enforcement?

25          A. I don't believe so.

1 Q. So how do you know then -- or strike that.

2 How did you know, then, what was reportable and  
3 what wasn't?

4 A. You know, I can't tell you how I learned that,  
5 but that's something that I learned and knew by the time  
6 I got to Cobb Center.

7 Q. But you have no memory of how you learned it  
8 and what you learned to be a reportable incident back in  
9 1974?

10 A. That's correct.

11 Q. Do you know if Cobb Center conducted its own  
12 internal investigations?

13 A. I don't know.

14 Q. Do you know if Cobb Center ever conducted one?

15 A. I don't know.

16 Q. Do you know if the State of Washington ever  
17 investigated Cobb Center?

18 A. For abuse or something like that, you mean, or  
19 what?

20 Q. In general now.

21 A. Well, yeah. There was a -- an investigation or  
22 a -- a review every year.

23 Q. So to your knowledge, did the State of  
24 Washington investigate Cobb Center between 1974 and 1980  
25 for abuse?

1           A. In those years that I was there, I know that  
2 the department, or State of Washington, did a review  
3 once a year of the facility, and I'm not sure what else  
4 they looked at.

5           Q. But do you know if the State of Washington,  
6 between 1974 and 1980, came to Cobb Center to  
7 investigate allegations of sexual abuse?

8           A. As far as I know, they did not. And as far as  
9 I know, there were no allegations.

10          Q. In 1974, did you know what type of allegations  
11 required an investigation?

12          A. Well, I -- I think so.

13          Q. Can you give me an example?

14          A. Yes. Sexually touching someone by a staff  
15 person.

16          Q. So for example, if a resident came to you and  
17 told you, "Hey, Mr. John has sexually touched me," you  
18 would have been required to investigate that?

19          A. I would have been required to investigate it,  
20 to report it to my supervisor, and, I believe, to report  
21 it to the police. I would have discussed that with my  
22 supervisor to see if that was accurate.

23          Q. Okay. And so to the best of your memory,  
24 though, is, between 1974 and 1980, no resident ever  
25 approached you to complain of allegations surrounding

1 sexual abuse?

2 A. Correct.

3 Q. If a resident in fact complained to you that he  
4 was being sexually abused by a staff member, would you  
5 actually, in fact, have reported that to CPS and/or law  
6 enforcement?

7 A. I believe so.

8 Q. But you don't know for sure?

9 A. I can't think of any reason that I wouldn't,  
10 but I would have discussed that with my supervisor,  
11 who -- there's no way that there would be no report.  
12 Let me put it that way. Whether the report went to the  
13 police or to CPS or to the department, that would be  
14 something that the supervisor and I would discuss and  
15 decide about.

16 Q. If a resident approached you to complain about  
17 allegations surrounding sexual abuse, would you have  
18 documented those concerns?

19 A. Yes.

20 Q. And where would you have documented those  
21 concerns?

22 A. In notes that I took.

23 Q. Notes in your personal notepad?

24 A. Notes in my office that went into each child's  
25 folder.

1 Q. And so if you took notes surrounding  
2 allegations of sexual abuse, you would have put those  
3 notes into the child's folder?

4 A. Yes.

5 Q. And where were those folders maintained?

6 A. In my office.

7 Q. And where in your office were they maintained?

8 A. In a locked drawer in my desk.

9 Q. And who had access to -- strike that.

10 A. To the drawer? Me.

11 Q. When you say it was a locked drawer, were you  
12 able to lock it with a key?

13 A. Yes.

14 Q. Okay. And who had access to that key?

15 A. Me.

16 Q. Anyone else?

17 A. No, I don't believe so. No.

18 Q. How many copies of that key did you have?

19 A. I had one.

20 Q. And how large was that drawer?

21 A. File drawer size.

22 Q. Three feet tall? Four feet tall?

23 A. Oh, as tall as it -- it was -- it was one  
24 drawer of a desk. It was a file drawer of a desk that  
25 was for 8 1/2 by 11 sheets of paper.

1           Q. That's where you maintained the residents who  
2 were placed in Cottage A, their files would have been  
3 maintained in that one drawer in your desk?

4           A. Yes.

5           Q. And how long did you maintain those files in  
6 your drawer?

7           A. Until a child left.

8           Q. After the child left, what did you do with the  
9 file?

10          A. I would -- they would go to the office,  
11 Children's Home Society, and I believe they were --  
12 well, I'm not sure what happened to them then. I think  
13 they were filmed and filed.

14          Q. So when you say they would have went to the  
15 Children's Home Society office, are you referring to  
16 the -- the principal office of Children's Home Society?

17          A. I'm referring to the Northwest branch office of  
18 Children's Home Society.

19          Q. And where was that located?

20          A. Right next to Cobb Center. 65th and 33rd in  
21 Seattle.

22          Q. Did you personally deliver those files to the  
23 principal office next to Cobb Center?

24          A. Probably.

25          Q. And do you know what Children's Home Society

1 did with the files that you delivered to them?

2 A. Yes. What I said. I think that they were  
3 copied or -- you know, however you save stuff on a  
4 computer, they were copied and saved, I believe.

5 Q. And do you know if they destroyed those records  
6 after they were copied and saved?

7 A. No, I don't know. Probably. The requirement  
8 for saving them would be seven years after -- I believe  
9 seven years after the 21st birthday of the youth.

10 MR. BROWN: So let's go ahead and take a --  
11 a five-minute break.

12 THE WITNESS: Okay.

13 MR. MAYBROWN: Would you like me to email  
14 you --

15 THE VIDEOGRAPHER: One second. We are going  
16 off record. The time is 2:25.

17 (Recess from 2:25 p.m. to 2:36 p.m.)

18 THE VIDEOGRAPHER: We are back on record.  
19 The time is 2:36.

20 (Exhibit No. 1 marked.)

21 E X A M I N A T I O N (Continuing)

22 BY MR. BROWN:

23 Q. All right. So, Mr. Gill, so during the break,  
24 your counsel was so kind to send us a copy of the  
25 résumé, which I have circulated to the court reporter,

1 as well as to the attorney for the State of Washington.  
2 And so as I previously mentioned, we'll go ahead and  
3 mark that as Exhibit 1 to your deposition.

4 Mr. Gill, going back to your time at Cobb  
5 Center, can you tell me the number of shifts that were  
6 there during the day?

7 A. Could I tell you -- say it again? I'm sorry.

8 Q. The number of shifts. For example, morning  
9 shift, afternoon shift --

10 A. Oh, it wasn't -- it wasn't by shift. There  
11 were two groups of three staff that each worked a half a  
12 week, worked Sunday through mid-Wednesday, or Wednesday  
13 through end of Saturday.

14 And so different members of each of those three  
15 teams would work -- there would be two people in the  
16 morning, one person in the daytime, and generally three  
17 people in the evening.

18 Q. Okay. Would you remain at Cobb Center 24/7?

19 A. Nobody did.

20 Q. Okay. And so what time would you arrive at  
21 Cobb Center during the day?

22 A. Probably about 9:00.

23 Q. And what time would you leave?

24 A. About 6:00.

25 Q. And so then at what time did the staff start

1 working to relieve you of -- off your shift?

2 A. Nobody relieved me of my shift.

3 Q. Okay. And so what about, then, the residential  
4 counselors?

5 A. They're the people there all day.

6 Q. And so what time did their shift start?

7 A. Pardon me?

8 Q. What time did their shift start?

9 A. There would be two of the three people there in  
10 the morning, first thing getting the kids up and off to  
11 school; one person there during the daytime, while the  
12 kids were at school; and then two -- and then three  
13 people there after the kids got home from school, until  
14 they went to bed; from bedtime until time to get up in  
15 the morning, there was another staff person who was  
16 there.

17 Q. So what time in the morning did the first staff  
18 arrive at Cobb Center to get the kids up in the morning?

19 A. I think about 7:00. I'm not positive, though.

20 Q. And then what time did that staff leave?

21 A. One of them stayed and one of them left at  
22 about 9:00.

23 Q. All right. 9:00 a.m.?

24 A. Yes.

25 Q. Okay. And then how long would the other staff

1 who stayed remain on -- at Cobb Center?

2 A. Until 3:00 or a little later in the afternoon.

3 Q. And then what time did the individual staff  
4 start working who relieved the staff who left at 3:00 in  
5 the afternoon?

6 A. 2:30 or 3:00.

7 Q. Okay. And then what time did that staff leave  
8 Cobb Center?

9 A. There would be two or three staff people on in  
10 the afternoon. One or two of them would leave probably  
11 about 9:00 or 9:30, the other at 10:00.

12 Q. And then you mentioned that there was one  
13 individual who worked the graveyard or night shift?

14 A. That's correct. That's another person outside  
15 of the six staff at the cottage.

16 Q. And so what time would the person who worked  
17 night shift arrive at Cobb Center?

18 THE COURT REPORTER: I think Mr. Hornbrook  
19 was booted. Sean, did -- oh, now he's on there twice.  
20 Can you hear me, Sean?

21 THE WITNESS: Yes, I can.

22 THE COURT REPORTER: No, I'm sorry. I'm  
23 speaking to Mr. Hornbrook.

24 THE WITNESS: Okay.

25 THE COURT REPORTER: I don't think he can

1 hear us.

2 MR. BROWN: We can go off the record real  
3 quick.

4 THE VIDEOGRAPHER: We are going off record.  
5 The time is 2:41.

6 (Pause in proceedings.)

7 THE VIDEOGRAPHER: We are back on record.  
8 The time is 2:49.

9 E X A M I N A T I O N (Continuing)

10 BY MR. BROWN:

11 Q. So we're back on the record after a brief  
12 interruption due to Mr. Hornbrook having some  
13 connectivity issues. It's the unfortunate reality we  
14 have with these COVID and Zoom times.

15 But I believe my last question to you,  
16 Mr. Gill, was, what time did the night shift leave Cobb  
17 Center?

18 A. And I said -- what I said was about 7:00 a.m.

19 Q. Okay. And so just for my purposes, again, so  
20 from 10:00 p.m. to 7:00 a.m., there was only one staff  
21 member per cottage?

22 A. Correct.

23 Q. Okay. And so from 2:30 p.m. to about  
24 10:00 p.m., there were two staff members?

25 A. Two or three, correct.

1 Q. Okay. And from 7:00 a.m. to 3:00 p.m., there  
2 were approximately two to three staff members?

3 A. 7:00 a.m. to 9:00 a.m., there were two;  
4 9:00 a.m. to 3:00 p.m. or thereabouts, 2:30 p.m., there  
5 was one.

6 Q. And so those staff who were there during those  
7 shifts, those would have been the residential  
8 counselors?

9 A. Yes, correct.

10 Q. Including Judy Chinella?

11 A. Yes. Correct again.

12 Q. And can you explain where Cottage A and  
13 Cottage B and Cottage C were in relation to each other?

14 A. Well, kind of next-door. They were on a city  
15 block, located on a city block, and the office was on  
16 65th, and then behind the office were the three  
17 cottages.

18 Q. And so were these cottages immediately adjacent  
19 to each other?

20 A. Well, 40 feet apart, something like that.

21 Q. And then so you had the three cottages plus an  
22 office building?

23 A. Correct.

24 Q. Okay. And then so next to all of that, you had  
25 Children's Home Society's principal office?

1           A. That was the office building.

2           Q. That was the office building. So your office  
3 then was in the Children's Home Society's principal  
4 office building?

5           A. No. My office was in the cottage.

6           Q. It was in the cottage. Thank you.

7                   So do you, by chance, have a piece of paper  
8 handy where you can maybe draw for me where these  
9 buildings were located?

10          A. I probably can. Let's see.

11          Q. Okay. So for the record, you're holding up a  
12 piece of paper, and it looks like you drew a horizontal  
13 building, and it says "cottage" on there. Okay.  
14 Perfect.

15                So, Mr. Gill, can you help identify what you  
16 drew for the record.

17          A. What I drew?

18          Q. Correct.

19          A. Okay. Yeah, this is Northeast 65th Street.  
20 This is --

21          Q. Can you hold it up a little bit higher so we  
22 can see it in -- in the picture?

23          A. Pardon?

24          Q. Can you bring it up a little bit more so we can  
25 see it in the picture? A little bit higher. So if you

1 maybe bring it -- back further. There you go. Perfect.

2 A. Okay. On your right is Northeast 65th Street.

3 On Northeast 65th is the office. Then the street  
4 perpendicular to 65th is 33rd. On 33rd are Cottage A  
5 and Cottage B. And then across the field is Cottage C.

6 Q. Perfect. And so was Cottage C in walking  
7 distance from Cottage B?

8 A. Oh, yeah.

9 Q. Okay. So can you maybe describe approximately  
10 how many feet separated the two buildings?

11 A. Probably 60.

12 Q. Okay.

13 A. Maybe 50.

14 MR. BROWN: And so I will ask your counsel  
15 to make a copy of that during our next break, and then  
16 send it to us, and we'll mark that as Exhibit 2 to your  
17 deposition.

18 BY MR. BROWN:

19 Q. How many rooms for the residents were in each  
20 cottage?

21 A. Four.

22 Q. So did each room house two residents at a time?

23 A. Correct.

24 Q. Were there any other rooms in the building?

25 A. Well, yeah. My office, the resident

1 counselor's office, living room, dining room, kitchen,  
2 and pantry.

3 Q. Okay. And do you know approximately how many  
4 square feet Cottage C was?

5 A. I don't know.

6 Q. Approximately?

7 A. Couldn't tell you.

8 Q. Was it a one-story building?

9 A. Yes.

10 Q. And by the way, some of the children who were  
11 placed at Cobb Center, did any of them have any  
12 developmental disabilities?

13 A. Possibly a somewhat lowered IQ, borderline --  
14 borderline IQ, like in the 70s.

15 Q. Do you know if any of the children who were  
16 placed at Cobb Center were maybe struggling with autism  
17 or Asperger's, Down syndrome?

18 A. Not that I know of.

19 Q. Did Cobb Center provide vocational services?

20 A. No.

21 Q. Did Cobb Center provide educational services  
22 independent of the children going to school?

23 A. Some, yes.

24 Q. So what did that look like?

25 A. Children in training by -- oh, that's -- by --

1 I don't know who. I can't remember. It was -- it was  
2 Singleton testing, which is testing reading and writing  
3 by an expert whose name I'm not remembering, and then I  
4 can't remember if they had tutoring related to that, or  
5 if that information was simply sent to the school.

6 Q. By the way, what school district did the  
7 children who were placed at Cobb Center attend?

8 A. Seattle.

9 Q. And do you know what school they went to?

10 A. They went to -- no, I can't remember the name  
11 of the school.

12 Q. Were the children picked up by bus and then  
13 transported to school?

14 A. I believe they could walk because the school  
15 that most of them went to was an elementary school, and  
16 only two blocks away. The kids that were older went to  
17 middle school, would have been transported by bus.

18 Q. So the kids who were in elementary school, they  
19 were able to walk to school, and the kids --

20 A. I believe so.

21 Q. And the kids who were in middle school, they  
22 were transported by bus?

23 A. I believe so.

24 Q. Do you know if any of the --

25 A. They were transported -- they were transported

1 by Cobb Center transportation, a van.

2 Q. So Cobb Center had its own van that it would  
3 use to transport some children?

4 A. Each of the cottages had their own vehicle.

5 Q. And who was authorized to operate the vehicle?

6 A. All of the staff. Resident -- all the resident  
7 counselors.

8 Q. Did Cobb Center use the vehicle to take any of  
9 the children off campus for recreational purposes?

10 A. Yes.

11 Q. Did you do that too? Did you take any of the  
12 kids off campus in the van?

13 A. No.

14 Q. Do you know who did?

15 A. Different staff members. Depends on who was  
16 working.

17 Q. Do you know if the staff member obtained  
18 permission from the State to take a child off campus?

19 A. I have no idea. I don't know how that would  
20 have worked.

21 Q. And do you know what some of the things were or  
22 what some of the staff did when they took a child off  
23 campus in the van?

24 A. They'd take a group of kids generally, like to  
25 Cottage Lake, or to a swimming pool not far from where

1 the cottages are, or to Evans Pool or Green Lake, that  
2 sort of thing.

3 Q. So would the staff only transport children who  
4 were placed at the Cobb Center in the Cobb Center van  
5 during the summertime?

6 A. Well, in the wintertime as well, but I don't  
7 know where exactly they went. I can't remember.

8 Q. Was anyone allowed to go into Cobb Center while  
9 children were on campus?

10 A. Was anyone allowed to?

11 Q. Correct.

12 A. No.

13 Q. So was it a closed-off facility?

14 A. Well, I don't know what you mean exactly by  
15 closed off. If somebody wandered in, which I believe  
16 happened once, anyway, while I was there, they were told  
17 that this was a private organization and they couldn't  
18 be there, and to get off the property, which they did.

19 Q. Do you know who that individual was who showed  
20 up on campus who was unauthorized to be there?

21 A. I have no idea.

22 Q. When you were working at Cobb Center in 1974,  
23 you were already married; is that right?

24 A. Correct.

25 Q. But your children were not born yet.

1 A. That's also correct.

2 Q. Why did you leave in 1980?

3 A. A different job.

4 Q. And what job was that?

5 A. That was supervisor of the outpatient services  
6 unit at Children's Home Society, located in the office  
7 that I showed you on the map.

8 Q. And that was the office building adjacent to  
9 the three cottages at Cobb Center?

10 A. Uh-huh.

11 Q. So while you were working in the Children's  
12 Home Society office, did you ever go back into Cobb  
13 Center to visit any of the children?

14 A. Oh, probably not. I probably went over to  
15 visit staff once in a great while, but generally, no.

16 Q. To the best of your memory, then, between 1974  
17 and 1980, did anyone who was working at the principal  
18 office of Children's Home Society come on the campus of  
19 Cobb Center?

20 A. Yeah. Dale Brown, Norm Mattern.

21 Q. And so when they came on campus, what did they  
22 do?

23 A. Looked around. Dale Brown had meetings there  
24 with staff. So it would be meetings. Generally,  
25 Mr. Mattern came over just to say hello and how are

1 things going.

2 Q. Do you know if the Children's Home Society  
3 office building is still at that same location?

4 A. No. The buildings are all knocked down.

5 Q. Do you know if they transferred to a different  
6 location?

7 A. No. There is no more Cobb Center.

8 Q. What about Children's Home Society?

9 A. Yes. It's in a different location. I don't  
10 know where.

11 Q. So when you were working in the Children's Home  
12 Society office building, who did you report to?

13 A. Norm Mattern, and then Sharon Osborn.

14 Q. And who was Sharon Osborn?

15 A. She was the director -- Northwest branch  
16 director after Norm Mattern. When Norm left, she was  
17 hired.

18 Q. And what was your title when you began working  
19 at the Children's Home Society office?

20 A. Social work supervisor or outpatient services  
21 supervisor.

22 Q. And so how did your work differ from the work  
23 you were doing at Cobb Center?

24 A. Most of what I was doing as a supervisor was  
25 supervising staff. I did not do as much direct

1 counseling then as I had done at Cobb Center.

2 Q. So were you supervising the staff at Cobb  
3 Center?

4 A. No. The staff in the outpatient department.

5 Q. So once you started working at the Children's  
6 Home Society office, at that point, then, you no longer  
7 had any work in connection with Cobb Center?

8 A. Correct.

9 Q. Okay. And what about sometime in the future?

10 A. None.

11 Q. So when you left in 1980, that was the last  
12 time that you had any connection to Cobb Center; is that  
13 right?

14 A. Well, Cobb Center was right next-door, as I  
15 said, and I could have gone over and said hi to  
16 somebody, one of the staff that I knew. But other than  
17 that, no, I had no -- no responsibility for that  
18 facility.

19 Q. And then for how long did you work for  
20 Children's Home Society?

21 A. Altogether?

22 Q. Correct.

23 A. '74 to '80 at Cobb Center, and '81 to '86 in --  
24 in the office.

25 Q. Do you know who Scott Hanauer is?

1 A. Yes.

2 Q. Who is that?

3 A. Staff person in Cottage B. And then I  
4 believe -- well, I don't know. He was the staff person  
5 in Cottage B.

6 Q. Was he a residential counselor?

7 A. Yes.

8 Q. Okay. And was he working at Cobb Center during  
9 the time you were there?

10 A. Yes.

11 Q. Was he working there before you began your  
12 employment in 1974?

13 A. I don't remember if he was there before or not.

14 Q. Was he still working at Cobb Center when you  
15 left in 1980?

16 A. I don't remember that either.

17 Q. And so what do you recall about Scott Hanauer?

18 A. Just that he was a resident counselor in  
19 Cottage B. Nice guy.

20 Q. Did you work in any shape or form with him  
21 directly?

22 A. No.

23 Q. Do you know if Scott Hanauer ever expressed any  
24 concerns about a child being sexually abused at Cobb  
25 Center?

1 A. Not that I know of, no.

2 Q. You already mentioned Judy Chinella. What else  
3 can you tell me about her, other than she being a  
4 residential counselor in Cottage A?

5 A. Well, she was, I believe, the longest  
6 residential counselor until she retired, and was the one  
7 that, from time to time, children came back to visit.  
8 She was very good. Other than that, I don't know  
9 what -- what else you're asking.

10 Q. So was Judy working at Cobb Center before you  
11 began your employment there?

12 A. Yes.

13 Q. And was she still working at Cobb Center after  
14 you left in 1980?

15 A. Yes.

16 Q. And was she still working at Cobb Center when  
17 you left Children's Home Society in 1986?

18 A. Yes.

19 Q. Are you still in contact with Scott Hanauer?

20 A. No.

21 Q. When was the last time you spoke to him?

22 A. Probably when I was working at Children's Home  
23 Society.

24 Q. And what about Judy Chinella? Are you still in  
25 contact with her?

1 A. No. She's dead.

2 Q. When did she pass away?

3 A. About six months ago.

4 Q. How did you learn of that?

5 A. Well, I knew her. Last time I saw her was  
6 about six months ago, just before she passed away.

7 Q. Do you know who Bob Decker is?

8 A. Yes.

9 Q. Who is that?

10 A. Night staff for Cottage A.

11 Q. Was he working at Cobb Center when you began  
12 your employment in 1974?

13 A. I don't think so, but I can't tell you for  
14 sure. He was there most of the time that I was there.

15 Q. Was he still working at Cobb Center when you  
16 left in 1980?

17 A. I don't believe so.

18 Q. Do you know what year he left?

19 A. No.

20 Q. And what do you recall about Bob Decker?

21 A. Nothing particular. He was night staff. He  
22 came in and slept, or took care of kids if there was --  
23 if they were sick or something like that.

24 Q. Do you know who hired Bob Decker?

25 A. No.

1           Q. Do you know what experience he had working with  
2 children?

3           A. No.

4           Q. Do you know why he left Cobb Center?

5           A. No.

6           Q. Are you still in contact with Bob Decker?

7           A. No.

8           Q. When was the last time you spoke to him?

9           A. The last time when I was -- sometime at -- when  
10 I was at Cobb Center.

11          Q. And so when Bob Decker was the night staff  
12 person, he was working alone, unsupervised with the  
13 children in Cottage A; is that correct?

14          A. Correct.

15          Q. Where -- where did the night staff -- strike  
16 that.

17                 Did the night staff have an office in each  
18 cottage?

19          A. There was a staff office in each cottage, and  
20 in the staff office was a bed for night staff. There  
21 also was a night staff house, where night staff could be  
22 whenever they weren't working in the cottage.

23          Q. Where was the night staff house located?

24          A. At the end of the property.

25                 Do you want me to put it on the map?

1 Q. That would be great.

2 A. (Witness complies.)

3 Q. Okay. So could you pull the piece of paper  
4 back a little bit further?

5 A. Pull it back? Sure.

6 Q. Right. Okay. So can you explain for the  
7 record what you added to the map and where its location  
8 is?

9 A. This is what I added, the night staff house.  
10 It was at the -- the -- the property went from 65th to  
11 whatever this street is here. I don't know what street  
12 that was. Night staff house was on that street. That's  
13 this street. And the office was on 65th.

14 Q. And so just for the record, the night staff  
15 house then was across from the Children's Home Society  
16 office, next to -- or in between, somewhat, Cottage B  
17 and Cottage C?

18 A. Yes.

19 Q. Okay. All right. Thank you.

20 And so did you mention that the night staff  
21 could go into the night staff house whenever the night  
22 staff was not working?

23 A. They could. That was their place if they  
24 wanted -- where they lived.

25 Q. So the night staff lived on campus?

1           A. They lived in the night staff house with no  
2 responsibilities on campus except when they were working  
3 night staff.

4           Q. So did the night staff have to pay rent --

5           A. No.

6           Q. -- in order to stay in the night staff house?

7           A. No.

8           Q. That was part of their employment?

9           A. That was part of their employment.

10          Q. Was the night staff allowed to take residents  
11 into his or her house?

12          A. I don't think they did. I don't know if  
13 allowed or not, but I don't think they did.

14          Q. And do you know who had a key to the night  
15 staff house?

16          A. I assume night staff did. Probably somebody in  
17 the administration building. I don't know who all. I  
18 didn't.

19          Q. Okay. And so when the night staff was working,  
20 would he then remain in the cottage that he was assigned  
21 to for the entire shift, from 10:00 p.m. to 7:00 a.m.?

22          A. Yes.

23          Q. And so was there one single night staff who  
24 oversaw all three cottages?

25          A. No. There were three night staff.

1           Q.   So did all three night staff live in the night  
2 staff house?

3           A.   I believe so.

4           Q.   How many bedrooms did the night staff house  
5 have?

6           A.   I have no idea.

7           Q.   So you've never been into the night staff  
8 house?

9           A.   That's correct.

10          Q.   So you worked essentially for Children's Home  
11 Society from 1974 up until 1986 collectively, and not  
12 once have you been in the night staff house. Is that  
13 your testimony? Is that a yes?

14          A.   Yes. I'm sorry. That's correct, yes.

15          Q.   And so it's your testimony that Bob Decker, who  
16 was the night staff, also lived in the night staff  
17 house?

18          A.   As far as I know. Yes, that -- that's to the  
19 best of my knowledge, yes.

20          Q.   And what was the night staff's roles and  
21 responsibilities?

22          A.   Being in the cottage from 9:00 p.m., 10:00 p.m.  
23 until 7:00 a.m.

24          Q.   And what did the night staff do while he was in  
25 the cottage?

1           A. Part of the time they slept, and part of the  
2 time they just did whatever they wanted to do. They  
3 could do schoolwork if they were in school, or whatever.

4           Q. And between 1974 and 1980, I'm assuming there  
5 were no cameras in Cottage A?

6           A. That's correct.

7           Q. And so you would agree with me, then, that the  
8 night staff, for example, here Bob Decker, was  
9 unsupervised in Cottage A from 10:00 p.m. to 7:00 a.m.?

10          A. There was no one else there to supervise  
11 directly, that's correct.

12          Q. So if Bob Decker was sexually abusing children  
13 at Cobb Center between 10:00 p.m. and 7:00 a.m., that  
14 essentially would have went unnoticed; is that right?

15          A. By staff probably, except it wouldn't have gone  
16 unnoticed by the victim, and I assume the victim would  
17 have told one of the staff.

18          Q. But you previously testified, though, that you  
19 have no memory of any resident reporting that he was  
20 sexually abused while he was placed at Cobb Center.

21          A. Correct.

22          Q. So you're not aware of any allegations made  
23 against Bob Decker for sexually abusing a resident at  
24 Cobb Center?

25          A. Correct.

1           Q. By the way, are you aware of any residents  
2 sexually abusing each other at Cobb Center?

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

4           Q. You never learned of a resident experimenting  
5 sexually with another resident while they were placed at  
6 Cobb Center between 1974 and 1980?

7           A. That's correct.

8           Q. What about between 1980 and 1986?

9           A. I had nothing to do with Cobb Center then.

10          Q. But my question is, between 1980 and 1986, did  
11 you become aware of residents sexually abusing each  
12 other --

13          A. No.

14          Q. -- at Cobb Center?

15          A. No.

16          Q. Okay. Do you know who Kenneth Bell is?

17          A. Who?

18          Q. Kenneth Bell?

19          A. No.

20          Q. Do you know a resident by the name G.F.,  
21 formerly known as G.H.?

22          A. I know who G.H. is.

23          Q. And who is G.H.?

24          A. He was a resident in Cottage A.

25          Q. Was he a resident at Cottage A during your time

1 period at Cobb Center?

2 A. Yes.

3 Q. So that would have been between 1976 and 1980?

4 A. Sometime in there, yes.

5 Q. And what do you recall about G.H.?

6 MR. MAYBROWN: For the record, I want to be  
7 clear. And if you could just state for the record that  
8 Mr. Gill has a full waiver from G.H., whoever that is --  
9 I think he might be your client -- to discuss his time  
10 at the Cobb Center.

11 MR. BROWN: Okay. And I appreciate that.  
12 So yes, G.H., or G.F., is my client.

13 MR. MAYBROWN: And do you have -- are you  
14 giving a full waiver on behalf of your client to discuss  
15 his time at the Cobb Center, to Tom Gill.

16 MR. BROWN: Yes, Counsel.

17 MR. MAYBROWN: Okay. With that waiver, then  
18 you can ask your questions about this one particular  
19 person.

20 THE WITNESS: Okay.

21 BY MR. BROWN:

22 Q. So what do you recall about G.H.?

23 A. Not very much. I don't think he did very well  
24 in school. Probably learning disabled. I remember that  
25 he, before coming to Cobb, and my guess is when he left

1 Cobb, lived with his grandma, and with some adult man  
2 who I understand eventually married his grandma, but was  
3 quite a bit younger. He -- maybe mischievous would be  
4 the word.

5 Other than that, I don't -- I can't think of --  
6 nothing comes to mind about him. Yes, it does. He --  
7 oh, pardon me. He visited Judy, or contacted Judy after  
8 he left, and I think before she left, to say hello and  
9 tell his story of how he was doing.

10 Q. Do you know how old G.H. was when he was placed  
11 at Cobb Center?

12 A. No.

13 Q. Do you know if he was placed at Cobb Center by  
14 the State of Washington?

15 A. My guess is yes, but I don't know that for a  
16 fact.

17 Q. So it's your belief, though, that G.H. -- his  
18 name is G.F. now -- that he was a ward of the State  
19 during his time at Cobb Center?

20 A. Okay.

21 MR. HORN BROOK: Objection. Form.

22 Please go ahead.

23 MR. MAYBROWN: You can answer, if you know.

24 A. Oh, I'm sorry. Say it again. I didn't know  
25 that was a question.

1 BY MR. BROWN:

2 Q. So your belief is, then, that G.F. was a ward  
3 of the State during his placement at Cobb Center?

4 A. My best guess would be that he was.

5 Q. Did Mr. G.F., did he have a roommate at Cobb  
6 Center?

7 A. I'm sure he did. I don't know who it was,  
8 though.

9 Q. And did you have any speaking therapy sessions  
10 with Mr. G.F.?

11 A. Yes.

12 Q. And what were some of the things you discussed  
13 with him?

14 A. I can't remember at all. That was many, many  
15 years ago.

16 Q. And by the way, when you were having these  
17 speaking sessions with the residents at Cobb Center,  
18 were these one-on-one sessions?

19 A. Yes.

20 Q. And were they done outside the sight of any  
21 other residents or staff members?

22 A. They were done in my office.

23 Q. And your office had a door?

24 A. Yes.

25 Q. And was the door closed?

1 A. Yes.

2 Q. Did your office have any windows?

3 A. Only to the outside.

4 Q. And were those blinds -- strike that.

5 Did your window have any blinds?

6 A. I don't remember.

7 Q. Did your window have any shutters?

8 A. Not that I know of, no.

9 Q. Curtains?

10 A. No, I don't remember. I don't think so.

11 Q. When you had a resident in your office during  
12 the speaking therapy sessions, was anyone from the  
13 outside able to see into your office?

14 A. If they looked in from the outside, I'm sure  
15 they could have. From the inside, no. But they -- I  
16 didn't lock the door, so a staff member could have come  
17 in.

18 Q. And when you had these speaking sessions with  
19 Mr. G.F., did you document your guys' individual  
20 sessions?

21 A. Yes.

22 Q. Okay. And then those documentations would have  
23 been placed into his file that you had in your office?

24 A. Yes.

25 Q. Did you audio record any of your sessions with

1 your residents?

2 A. Say that again?

3 Q. Did you audio record any of your sessions --

4 A. Oh, no.

5 Q. -- with the residents?

6 A. I'm sorry. No, I did not.

7 Q. And do you recall Mr. G.F. telling you that he  
8 was sexually abused by Bob Decker?

9 A. No, I do not.

10 Q. So it's your testimony, then, that you have no  
11 independent recollection of Mr. G.F. voicing that he was  
12 being sexually abused by Bob Decker repeatedly?

13 A. That is exactly correct.

14 Q. And if a staff member was in fact sexually  
15 abusing a resident, you wouldn't be covering for that  
16 staff; right?

17 A. No. I would have fired that staff and then  
18 done whatever reporting was required.

19 Q. And why that?

20 A. Why that?

21 Q. Correct.

22 A. Well, fired because of the safety of the  
23 children, and reporting because that's required of me,  
24 was required of me as a mandatory reporter.

25 Q. And a staff member sexually abusing a resident,

1 a minor resident, that's a crime; right?

2 A. Yes.

3 Q. And so that's why you would have reported it?

4 A. Correct.

5 Q. So when you would have -- if you would have  
6 reported it, a staff member committing a crime of  
7 sexually abusing a minor, you would have reported it to  
8 CPS, State of Washington, and law enforcement; right?

9 A. Probably.

10 Q. Do you know who Justin Kelly is?

11 A. No.

12 Q. Do you know who K.H. is?

13 A. Who?

14 Q. K.H., H-x-x-x-x?

15 A. No.

16 Q. So during your time at Cobb Center between 1974  
17 and 1980 -- 1980, is it your testimony that not a single  
18 resident disclosed to you that he was being sexually  
19 abused by a staff member at Cobb Center?

20 MR. MAYBROWN: Asked and answered.

21 But you can answer again.

22 THE WITNESS: I can answer?

23 MR. MAYBROWN: You can answer again.

24 A. Yes, that's correct.

25 ////

1 BY MR. BROWN:

2 Q. Do you know why Bob Decker left Cobb Center?

3 A. No. Generally speaking, people didn't stay  
4 there forever, for long times, but I don't know why  
5 particularly he left. Tired of staying up all night  
6 maybe.

7 Q. To your knowledge, how long did Judy Chinella  
8 work at Cobb Center?

9 A. I don't know how long she worked. She was  
10 there before I was there, and she was there after I was  
11 there.

12 Q. Do you know if she was still working at Cobb  
13 Center in 2004?

14 A. No, I don't know. I can't tell you exactly  
15 when she left. I don't know.

16 Q. So if Judy Chinella was working there in 2004,  
17 wouldn't you agree, then, that she was working there for  
18 a long time?

19 A. Whether she was working there 2004 or not, she  
20 was there a long time, yes.

21 Q. And do you recall the names of any other  
22 residents who were placed at Cobb Center between 1974  
23 and nineteen -- 1980?

24 A. No, I don't.

25 MR. BROWN: So let's go ahead and take ten

1 minutes.

2 THE VIDEOGRAPHER: We are going off record.

3 The time is 3:31.

4 (Recess from 3:31 p.m. to 3:44 p.m.)

5 THE VIDEOGRAPHER: We are back -- excuse me.

6 We are back on record. The time is 3:4 -- excuse me

7 again -- 3:44.

8 (Exhibit No. 3 marked.)

9 BY MR. BROWN:

10 Q. So, Mr. Gill, I added a document into the chat,  
11 and we'll mark it as Exhibit 3, and what I'll do here  
12 is, I'll share my screen. So you should be able to see  
13 what I'm looking at.

14 A. Okay.

15 Q. Okay. So, Mr. Gill, are you able to see my  
16 screen?

17 A. Yes.

18 Q. Okay. So Exhibit 3 is a Subpoena Duces Tecum,  
19 which was served to Thomas Gill, you. I'm wondering if  
20 you recall seeing a copy of this.

21 A. Yes, I have seen it.

22 Q. Okay. And so on Page 4, it lists Exhibit 2,  
23 which asked you to produce all documents, photographs,  
24 videotapes, emails, communications, and all other  
25 tangible items related to Children's Home Society and/or

1 Cobb Center.

2 A. Yes.

3 Q. Do you recall seeing that?

4 A. Yep.

5 (Exhibit No. 4 marked.)

6 BY MR. BROWN:

7 Q. Okay. And so in response to that, I believe I  
8 received some documents from you, which I've added into  
9 the chat, and we'll mark those as Exhibit 4. And again,  
10 I will share my screen. All right.

11 Are you able to see my screen?

12 A. Yes.

13 Q. Okay. So Exhibit 4 consists of three pages.  
14 I'll just kind of scroll through it real quick.

15 A. Yep.

16 Q. And then let me know if you recall producing  
17 these in response to your subpoena.

18 A. Yes.

19 Q. Okay. And so other than these three pages of  
20 documents, do you have any other documents, photos,  
21 videos, anything connected to Children's Home Society or  
22 Cobb Center in your possession?

23 A. Absolutely none.

24 Q. Okay. Can you tell me who wrote this letter on  
25 Page 1 of Exhibit 4?

1           A. "Tom Gill," it starts out, "dedicated," so on  
2 and so forth?

3           Q. Correct.

4           A. I would guess that Sharon Osborn wrote it. I  
5 don't know, though.

6           Q. Okay. And it looks like here you may have left  
7 October 29th; is that right?

8           A. That would probably be correct.

9           Q. Okay. So that would have been October 29th --

10          A. Yes.

11          Q. -- 1980 or 1986?

12          A. Well, I think it was '86.

13          Q. So this was when you left your employment with  
14 Children's Home Society, not --

15          A. Correct.

16          Q. -- Cobb Center.

17                 And there's an address here, Children's Home  
18 Society, 3300 Northeast 65th. Is that the address that  
19 you recall for Children's Home Society?

20          A. That was the address before they sold the  
21 property and knocked down the buildings.

22          Q. Okay. And so Page 2 and Page 3 appears to be  
23 some notes from individuals who -- who wrote something  
24 like good-byes to you; is that correct?

25          A. Correct. Yes.

1 Q. And so there are several names in here that I  
2 see, and I'm hoping that you can let me know who these  
3 people are.

4 A. Maybe.

5 Q. Looking at this document, can you let me know  
6 whose name you see and recognize?

7 A. No. Because I can't see them very clearly.

8 Q. I can enlarge the document for you.

9 A. All right.

10 Q. Is that better?

11 A. The first one in purple is Sharon. Oh, and in  
12 orange is Sharon. And then Barb. I don't know who Barb  
13 is. Sharon was the executive director.

14 Okay. Mary. I don't know who Mary is. Robert  
15 is Robert Strauss.

16 You want to go down a little bit? I don't know  
17 who the John is about finishing the house. I don't know  
18 who Meg is. Paul was a handyman there. Scott, I think  
19 was Scott Hanauer. Tom N, I don't know who that is, or  
20 Tom W. Stephanie or something. I don't know who that  
21 is. Susan, I don't know her last name. I think she was  
22 a therapist there. Charlotte, I don't know who that is.  
23 Diane, don't know who that is.

24 Q. There's also a Sylvia.

25 A. Oh, Sylvia. I don't know who that is either.

1 Q. Okay. So I'm scrolling down to Page 3.

2 A. Yeah, Laurie was a therapist there.

3 Q. Do you recall her last name?

4 A. No. Bob, I don't know which Bob that would be.  
5 John and Judy, John was the supervisor in Cottage C, and  
6 then got a different job there. Sara -- oh, Sara  
7 Warren. Sara Warren was the secretary. Charlie was the  
8 executive director of all of Children's Home Society.

9 Scroll down. Jackie Harden, I think was a --  
10 worked at Cottage C. Roseann was the assistant to -- to  
11 the director. Lawrence was a therapist in -- was -- no,  
12 a -- yeah, a therapist in the office. Randy was a  
13 therapist in the office. Heidi, I think was a therapist  
14 in the office. The Judy that's upside down, I think is  
15 Judy Chinella, but I'm not sure. Down some more.

16 Q. That's it?

17 A. That's it?

18 Q. That's it.

19 A. Then that's it.

20 Q. Okay. And for the individuals whose first name  
21 you mentioned, you do not recall their last names?

22 A. If I didn't say their last names, I don't know  
23 their last -- recall their last names, no. That's  
24 correct.

25 Q. So, Mr. Gill, when was the first time that you

1 raped a boy?

2 A. Pardon -- pardon me?

3 Q. When was the first time that you raped a boy?

4 MR. MAYBROWN: What are you talking about?

5 I -- I didn't hear your question.

6 BY MR. BROWN:

7 Q. Mr. Gill, when was the first time that you  
8 raped a boy?

9 THE WITNESS: Oh, okay.

10 A. Based on the advice of my counsel, I assert my  
11 rights under the Fifth Amendment and decline to answer.

12 BY MR. BROWN:

13 Q. Did you rape a boy before you were employed at  
14 Cobb Center?

15 A. Based on the advice of counsel, I assert my  
16 rights under the Fifth Amendment and decline to answer.

17 Q. Did you rape a boy during your employment at  
18 Cobb Center?

19 A. Based on the advice of counsel, I assert my  
20 rights under the Fifth Amendment and decline to answer.

21 Q. Did you rape a resident of Cobb Center?

22 A. Based on the advice of my counsel, I assert my  
23 rights under the Fifth Amendment and decline to answer.

24 Q. Isn't it true that you pled guilty to sexually  
25 abusing a minor?

1           A. Based on the advice of my counsel, I assert my  
2 rights under the Fifth Amendment and decline to answer.

3           Q. Well, that is a public record, Mr. Gill, that  
4 you pled guilty to sexually abusing a minor; isn't that  
5 right?

6           A. Again, based on the advice of my counsel, I  
7 assert my rights under the Fifth Amendment and decline  
8 to answer.

9           Q. Did you plead guilty to sexually abusing a  
10 minor before the case went to trial?

11          A. Based on the advice of my counsel, I assert my  
12 rights under the Fifth Amendment and decline to answer.

13          Q. In 2008, did you plead guilty to communication  
14 with a minor for immoral purposes?

15                 MR. HORNBROOK: Objection. Form.

16          A. Based on the advice -- pardon?

17                 MR. HORNBROOK: Sorry. This is  
18 Mr. Hornbrook just objecting to form, but please listen  
19 to your attorney and go from there. Thank you.

20          A. Okay. Based on the advice of my counsel, I  
21 assert my rights under the Fifth Amendment and decline  
22 to answer.

23 BY MR. BROWN:

24          Q. Okay. So in 2008, did you plead guilty to  
25 sexual exploitation or enticement of a minor?

1 A. Based on the advice of --

2 MR. HORNBROOK: Object to form.

3 A. -- my counsel --

4 THE WITNESS: Oh, go ahead.

5 MR. HORNBROOK: Objection. Form.

6 Please continue.

7 A. Based on the advice of my counsel, I assert my  
8 rights under the Fifth Amendment and decline to answer.

9 BY MR. BROWN:

10 Q. After you pled guilty to sexually abusing a  
11 minor, did you serve time in jail or prison?

12 A. Based on the advice --

13 MR. HORNBROOK: Objection. Form.

14 Please continue.

15 A. Based on the advice of my counsel, I assert my  
16 rights under the Fifth Amendment and decline to answer.

17 BY MR. BROWN:

18 Q. Mr. Gill, how much time did you spend in jail?

19 A. Based on the advice of my counsel, I assert my  
20 rights under the Fifth Amendment and decline to answer.

21 Q. There is no self-incriminating statement there.  
22 It's a factual question. I'm asking how much time you  
23 spent in jail.

24 MR. MAYBROWN: He's asserted his rights.

25 You can move on.

1 BY MR. BROWN:

2 Q. Sir, you're refusing to tell me how much time  
3 you served in jail?

4 MR. MAYBROWN: He is, and you can move on.  
5 If you want to take it up in front of the Court, you  
6 feel free to take anything up you want to.

7 BY MR. BROWN:

8 Q. Mr. Gill, when were you released from jail?

9 A. Based on the advice of my counsel, I assert my  
10 rights under the Fifth Amendment and decline to answer.

11 Q. Okay. Well, Mr. McGill -- Mr. Gill, if you  
12 were in prison, what -- when were you released from  
13 prison?

14 A. Based on the advice of my counsel, I assert my  
15 rights under the Fifth Amendment and decline to answer.

16 Q. Are you currently on probation?

17 A. Based on the advice of my counsel, I assert my  
18 rights under the Fifth Amendment and decline to answer.

19 Q. Do you currently have to register as a sex  
20 offender?

21 A. Based on the advice of my counsel, I assert my  
22 rights under the Fifth Amendment and decline to answer.

23 Q. Isn't it true that your son caught you in the  
24 act sexually abusing a minor?

25 A. Based on the advice of my counsel, I assert my

1 rights under the Fifth Amendment and decline to answer.

2 Q. What's your current relationship with your  
3 sons?

4 A. Based on the advice of my counsel -- pardon?

5 MR. MAYBROWN: You can answer that.

6 THE WITNESS: Okay.

7 A. It is strained, but existent.

8 BY MR. BROWN:

9 Q. And is that with both of your sons?

10 A. Yes.

11 Q. When was the last time you communicated with  
12 your sons?

13 A. Oh, probably a month ago.

14 Q. Did you talk to him about your deposition?

15 A. I don't believe I did, no.

16 Q. And which son was that who you talked to about  
17 a month ago?

18 A. Kyle.

19 Q. When was the last time you spoke to Nicholas?

20 A. I don't remember. Probably Christmastime.

21 Q. Do you have any grandchildren?

22 A. Five.

23 Q. And do your sons allow you to have unsupervised  
24 visitations with them?

25 A. No.

1 Q. Why not?

2 A. Based on the advice of my counsel, I assert my  
3 rights under the Fifth Amendment and decline to answer.

4 Q. Did you sexually abuse one of your  
5 grandchildren?

6 A. Based on the advice of my counsel, I assert my  
7 rights under the Fifth Amendment and decline to answer.

8 Q. Have you ever sexually abused anyone who was  
9 developmentally delayed?

10 MR. MAYBROWN: At this point this is  
11 becoming harassment. It has nothing to do with the  
12 lawsuit. I'm going to let him assert now, but if you  
13 continue answering [sic], we're going to end the  
14 deposition.

15 MR. BROWN: It's totally relevant to the --

16 MR. MAYBROWN: It's not relevant --

17 (Simultaneous cross-talk.)

18 MR. BROWN: -- lawsuit --

19 MR. MAYBROWN: It's not relevant. It's not  
20 relevant to the time period or to any claim in the  
21 lawsuit. If you continue to ask, I'm going to say that  
22 it's harassment and we're going to end the deposition.  
23 So I'll let him assert now, but this is the last  
24 question, and then I'm going to assert harassment.  
25 Okay? You know, you're on notice.

1           A. Based on the advice of my counsel, I assert my  
2 rights under the Fifth Amendment and decline to answer.

3 BY MR. BROWN:

4           Q. And so isn't it true, then, that when G.F.  
5 reported Bob Decker for sexually abusing him, you didn't  
6 report it because you were also a sexual abuser of  
7 minors?

8           THE WITNESS: How do I answer that?

9           MR. MAYBROWN: Say no.

10          THE WITNESS: Huh?

11          MR. MAYBROWN: Off the record. I want to  
12 consult with him for a second about an assertion.

13          MR. BROWN: Sure.

14          THE VIDEOGRAPHER: We are going off record.  
15 The time is 4:01.

16          (Discussion off the record.)

17          THE VIDEOGRAPHER: We are back on record.  
18 The time is 4:02.

19          THE WITNESS: Okay. Your question was  
20 something about G.H. --

21          MR. MAYBROWN: Let him ask the question.

22          THE WITNESS: Pardon?

23          MR. MAYBROWN: He can re-ask the question.

24          THE WITNESS: Oh, ask the question again, if  
25 you would.

1 MR. BROWN: Sure, Mr. Gill.

2 BY MR. BROWN:

3 Q. So isn't it true that, when Mr. G.F., or G.H.,  
4 reported to you that he was being sexually abused by Bob  
5 Decker, you did not report it because you were also a  
6 sexual abuser of minors?

7 A. G.H. did not report any sexual abuse by Bob  
8 Decker or anyone else, for that matter, to me.

9 Q. Is that an unequivocal no, that G.H. never  
10 reported to you that he was being sexually abused by Bob  
11 Decker?

12 A. That is an unequivocal no.

13 MR. BROWN: Let's take five minutes, and I  
14 think we're close to wrapping up.

15 THE WITNESS: Okay.

16 THE VIDEOGRAPHER: We are going off record.  
17 The time is 4:04.

18 (Recess from 4:04 p.m. to 4:14 p.m.)

19 THE VIDEOGRAPHER: We are back on record.  
20 The time is 4:14.

21 E X A M I N A T I O N (Continuing)

22 BY MR. BROWN:

23 Q. Mr. Gill, during your time at Cobb Center  
24 between 1976 and 1980, do you know if any of the staff  
25 members had one of their children at Cobb Center?

1 A. You mean as a resident?

2 Q. As a resident or as a visitor?

3 A. Actually, no, I don't know the answer to either  
4 one. I'm sure not as a resident, and I don't know as a  
5 visitor.

6 Q. Are you currently still a licensed social  
7 worker?

8 A. Based on the advice of my counsel, I assert my  
9 rights under the Fifth Amendment and decline to answer.

10 Q. I'm not quite sure where the self-incriminating  
11 statement would come from, from a yes or no answer to  
12 whether you were still a licensed social worker. Are  
13 you still asserting your Fifth Amendment right?

14 A. Yes.

15 MR. MAYBROWN: He's answered.

16 BY MR. BROWN:

17 Q. Are you currently employed?

18 A. No.

19 Q. Retired?

20 A. Retired.

21 Q. When did you retire?

22 A. When did I? About three and a half years ago.

23 Q. And where did you retire from?

24 A. From handyman work.

25 Q. And when was the last time you did any social

1 work?

2 A. Based on the advice of my counsel, I assert my  
3 rights under the Fifth Amendment and decline to answer.

4 Q. Again, I'm not quite seeing the  
5 self-incriminating statement as to when you ended your  
6 employment doing any social work.

7 MR. MAYBROWN: You know, he's answered.  
8 This is so far afield, but keep going if you want to.

9 BY MR. BROWN:

10 Q. In 1986, you went into private social work  
11 practice; is that right?

12 A. Correct.

13 Q. And what was the private social work practice?

14 A. Family practice.

15 Q. And so what did --

16 A. Saw families, children.

17 Q. So did you work at a physical office?

18 A. Yes.

19 Q. And where was that office located?

20 A. There were two places: 710 10th Avenue East in  
21 Seattle, and a place in Kirkland.

22 Q. Were you leasing those spaces?

23 A. Leasing the space in Kirkland. And I don't  
24 know what you'd call it. I had an agreement with the  
25 owner of the space in Seattle. He did billing for me

1 and took a portion of the billing that I received.

2 Q. And what type of family social work did you  
3 provide in private practice?

4 A. Primarily to families with adopted children,  
5 traumatized children.

6 Q. And was there a reason why you chose to provide  
7 services to families with traumatized children?

8 A. Yes. I had done some training with Foster  
9 Cline and noted that the children that we did not seem  
10 to be helping at Cobb Center were these very children.

11 Q. The traumatized children?

12 A. Correct.

13 Q. And for how long were you in private social  
14 work practice?

15 MR. MAYBROWN: You know, this is another way  
16 to ask when he last conducted social work, which he's  
17 already asserted. Unless you have any more relevant  
18 questions to the lawsuit, I'm going to end the  
19 deposition. Last chance.

20 MR. BROWN: Okay. And so, Counsel, again, I  
21 disagree because all my questions are fair and very  
22 relevant to this lawsuit.

23 MR. MAYBROWN: You're asking him about  
24 things that happened more than three decades after he  
25 left the Cobb Center. Last chance to ask a question

1 relevant to the law- -- lawsuit. If you ask another one  
2 about his employment afterwards, it's going to be your  
3 last question.

4 BY MR. BROWN:

5 Q. So part of your private social work practice,  
6 did that also include you providing social work at your  
7 personal home?

8 MR. MAYBROWN: That's it. That's the last  
9 question. We're leaving. We conclude the deposition at  
10 4:24 p.m.

11 MR. BROWN: So I'm --

12 MR. MAYBROWN: I'm just -- I told you. I  
13 gave you a chance. You didn't --

14 MR. BROWN: And these are very fair  
15 questions that I'm asking, Counsel. So -- and this is  
16 my deposition. I have a right to ask questions. As you  
17 know, discovery's very broad, and that includes all of  
18 this here too.

19 MR. MAYBROWN: Okay.

20 MR. BROWN: Are you ending this deposition?

21 MR. MAYBROWN: I'm going to give you one  
22 last chance. Why don't you tell me what relevance it  
23 could be to ask questions about his private practice  
24 more than two decades or three decades after this claim?

25 If you can give me a factual basis, I'll

1 consider it, but I don't see any relevance, and yes,  
2 we're going to end the deposition if you don't satisfy  
3 me.

4 MR. BROWN: It goes to common scheme and  
5 pattern. This is something that's been going on for  
6 many, many years, including before he was even  
7 employed at Cobb Center. And it was going on even  
8 after.

9 MR. MAYBROWN: Okay. No, that's not going  
10 to work. We're going to end the deposition. I have  
11 4:20. We gave you a chance. You can feel free to make  
12 a motion to the judge why you can ask questions about  
13 decades afterwards, but we're -- we're ending the  
14 deposition.

15 MR. BROWN: All right.

16 MR. MAYBROWN: Thanks very much.

17 THE COURT REPORTER: I need to get -- I need  
18 to get one word that I didn't understand that the  
19 witness just said, if I could just ask that really  
20 quick.

21 MR. MAYBROWN: Go ahead. Sure.

22 THE COURT REPORTER: Yeah. Hang on. I'm  
23 going to -- it's just where you said -- you said, "Yes,  
24 I had done some training with Foster Cline." And I  
25 just --

1 THE VIDEOGRAPHER: Wait. Let me go off  
2 record. We haven't gone off record yet.

3 THE COURT REPORTER: Oh, sorry, Ed.

4 THE VIDEOGRAPHER: Sorry. I just want to  
5 make sure we go off record; right? Okay.

6 MR. HORNBOOK: Yes. Just before we go off  
7 record -- and this is Sean Hornbrook on behalf of the  
8 State -- we have no questions today. Thank you.

9 MR. MAYBROWN: Thank you, Mr. Hornbrook. I  
10 didn't mean to cut you off. I -- I needed to end the  
11 deposition because the plaintiff had been harassing my  
12 client. Thank you.

13 MR. BROWN: And I disagree. I've not been  
14 harassing your client.

15 MR. MAYBROWN: You know, you can take it up  
16 with the judge. Feel free to put the whole transcript  
17 in front of him and he'll decide, or she'll decide.  
18 Okay?

19 THE VIDEOGRAPHER: All right. Can we go off  
20 record?

21 MR. BROWN: We can go off record.

22 THE VIDEOGRAPHER: Okay. Going off record.  
23 The time is 4:22.

24 (Exhibit No. 2 marked.)

25 (Deposition concluded at 4:22 p.m.) (Signature waived.)

C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF PIERCE

I, Cindy M. Koch, a Certified Court Reporter in  
and for the State of Washington, do hereby certify that  
the foregoing transcript of the deposition of Thomas A.  
Gill, having been duly sworn, on September 27, 2021, is  
true and accurate to the best of my knowledge, skill and  
ability.

IN WITNESS WHEREOF, I have hereunto set my hand  
and seal this 4th day of October, 2021.



CINDY M. KOCH, CCR, RPR, CRR

My commission expires:

JUNE 9, 2022