Deposition of:

Cassandra Castillo

December 8, 2015

In the Matter of:

Payne vs. AMA Godby

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1   IN THE STATE COURT OF FULTON COUNTY

2   STATE OF GEORGIA

3

4   ANTONIO PAYNE,

5   Plaintiff,

                                    CIVIL ACTION

6   vs.

                                    NO. 15EV001072

7   AMA GODBY LLC,

8   Defendant.

9

10

11

12   Videotaped Deposition of CASSANDRA

13   CASTILLO, taken on behalf of the

14   Plaintiffs, pursuant to the stipulations

15   agreed to herein, before Richard Bursky,

16   RMR, CRR, RPR, CCR-2509, at 1932 North

17   Druid Hills, Suite 250, Atlanta, Georgia,

18   on the 8th day of December, 2015,

19   commencing at the hour of 10:58 a.m.

20

21

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25

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1   APPEARANCES OF COUNSEL:

2

3   On behalf of the Plaintiff:

4   JEB BUTLER, Esq.

             MICHAEL T. RAFI, Esq.

5   Butler Tobin

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             Atlanta, Georgia 30319

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    On behalf of the Defendant:

10

             WILLIAM T. CASEY, JR., Esq.

11   Hicks, Casey & Morton, P.C.

             136 North Fairgrounds Street, N.E.

12   Marietta, Georgia 30060

             770.428.1000

13   bill.casey@hickscasey.com

14

15

16   Also Present:

17   DEIDRE THOMAS, Videographer

18

19   -   -   -

20

21

22

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24

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 1                INDEX TO EXAMINATION

 2

 3    Examination                                Page

 4          By Mr. Butler                  5,43,59,61

 5          By Mr. Casey                    36,54,60

 6

 7                INDEX TO EXHIBITS

 8    Plf. Exhibit        Description            Page

 9    Exhibit A   Notice of Deposition of
                  Cassandra Castillo, 3 pages       4
10

      Exhibit 18 Email string, top one 6/21/14,
11               2 pages                           16

12    Exhibit 19 Courtesy Officers Activity Log,
                 6/2/2015 through 10/29/14         24
13

      Exhibit 20 Photograph of the witness with
14               Plaintiff's Exhibits 19, 20
                 and 21                            34
15

      Exhibit 21 Stack of blank paper, witness'
16               estimation of the size of
                 Binder 1 of Courtesy Officer
17               Activity Log                      35

18    Exhibit 22 Stack of blank paper, witness'
                 estimation of the size of
19               Binder 2 of Courtesy Officers
                 Activity Log                      35
20

      Exhibit 23 Email string, top one 12/29/14,
21               2 pages                           47

22

             (Original Exhibits 21 and 22
23         retained by Mr. Butler, the top sheet
           only of each exhibit attached.)

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1   (The signature of the witness to the

2   deposition, not being discussed, is

3   deemed waived.)

4

5   (Off the video record.)

6   MR. BUTLER: Off video, stay on

7   steno.

8   This will be the videotaped

9   deposition of Ms. Cassandra Castillo

10   taken in the case of Payne against Arman

11   Soltani, et al., taken pursuant to the

12   Civil Practice Act for all purposes

13   permitted by the Act including use at

14   trial.

15   (Plaintiff's Exhibit A was marked

16   for identification.)

17   MR. BUTLER: I have marked as

18   Exhibit A a copy of the notice of

19   deposition.

20   MR. CASEY: Very good.

21   MR. BUTLER: Let's go on video.

22   THE VIDEOGRAPHER: This is the

23   beginning of Disc 1 in the deposition of

24   Cassandra Castillo. The time is 10:59

25   a.m. and we are now on the record.

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1   I am sorry. We are now on the

2   record and the time is 10:59 a.m.

3   This is the beginning of the

4   deposition of Cassandra Castillo.

5   Will counsel please introduce

6   themselves and whom they represent, after

7   which the court reporter will swear in

8   the witness.

9   MR. BUTLER: Jeb Butler and Mike

10   Rafi on behalf of the Plaintiff Antonio

11   Payne.

12   MR. CASEY: Bill Casey for

13   Defendant.

14   CASSANDRA CASTILLO,

15 having been first duly sworn, testifies as follows:

16 EXAMINATION

17 BY MR. BUTLER:

18   Q.   Good morning.

19   A.   Good morning.

20   Q.   My name is Jeb Butler and I represent

21 Antonio Payne. Please state your name for the jury.

22   A.   Cassandra Castillo.

23   Q.   Ms. Castillo, did you at one time work at

24 Sierra Townhomes?

25   A.   Yes.

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1   Q.   When was that?

2   A.   The end of July to October.

3   Q.   Would that be in --

4   A.   2014.

5   Q.   2014?

6   A.   Yes.

7   Q.   Did you work with Arman Soltani when you

8   worked at Sierra Townhomes?

9   A.   I did.

10   Q.   What was your title at Sierra Townhomes?

11   A.   The assistant manager.

12   Q.   Did you understand Mr. Soltani to be the

13   owner of Sierra Townhomes?

14   A.   Yes.

15   Q.   When you worked at Sierra Townhomes, how

16   often, say on a per week basis, would you see Arman

17   Soltani?

18   A.   Four of the five days.

19   Q.   In a given work week?

20   A.   Yes.

21   Q.   Did Mr. Soltani have an office at Sierra

22   Townhomes?

23   A.   He did.

24   Q.   To the extent that you know, what did he

25   do in that office?

1   A.   He paid the "remainding" of the

2   properties, the other sister properties, and he also

3   paid all of the bills, he would complete payroll and

4   then also pay the bills that came in.

5   Q.   Were the payroll and the bills done, to

6   the extent you know, just for Sierra Townhomes or

7   for many properties that Mr. Soltani had ownership

8   interest in?

9   A.   For all of the properties.

10   MR. CASEY: Let me object as to form

11   as, first of all, lacking foundation.

12   That's -- and form of the question.

13   BY MR. BUTLER:

14   Q.   Ms. Castillo, was there a lot of crime at

15   Sierra Townhomes?

16   A.   Yes.

17   MR. CASEY: Objection, lacking

18   foundation.

19   BY MR. BUTLER:

20   Q.   Was Sierra Townhomes a safe place for

21   residents and their guests?

22   A.   No.

23   Q.   By the time the jury watches this

24   videotape they will have already heard about some

25   crime against residents and their guests. But I

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 1   would like to ask you about crime involving

 2   employees of Sierra Townhomes.

 3              Did Sierra Townhomes at one time have a

 4   maintenance guy named Damian?

 5        A.   Yes.

 6        Q.   What was Damian's title or what did you

 7   all call him?

 8        A.   He was a punch tech for Sierra Townhomes,

 9   and basically what he would do is complete

10   apartments, punch them and get them ready for

11   move-ins.

12        Q.   Did you all call him D or Damian or what

13   did you call him?

14        A.   D.

15        Q.   Was D ever the victim of crime at Sierra

16   Townhomes?

17        A.   Yes.

18        Q.   Tell us what happened.

19        A.   He actually didn't show up to work one

20   day.  And when I gotten home I called him and I kind

21   of asked to see if he was okay.

22              He then informed me he was held at

23   gunpoint at Sierra Townhomes and that's why he left

24   and he didn't return back to work.

25              MR. CASEY:  Excuse me one second.
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1   Let me object to the form of the

2   question, number one; number two, lacking

3   foundation; number three, clearly calling

4   for hearsay.

5   BY MR. BUTLER:

6   Q.   At the time that D told you that was D

7   still on the payroll for Sierra Townhomes?

8   A.   Yes.

9   Q.   What did D do after he got held at

10   gunpoint?

11   A.   He left the property.

12   Q.   Did he keep working for Arman Soltani or

13   not?

14   A.   Yes.

15   Q.   Tell me what happened, how he kept working

16   for Arman Soltani.

17   A.   Arman actually placed him at another

18   property.

19   Q.   Another property that Arman controlled?

20   A.   Yes.

21   MR. CASEY: Objection as to form,

22   leading and lacking foundation.

23   BY MR. BUTLER:

24   Q.   Was the other property that D went to, to

25   the extent that you know, another property that

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1   Arman Soltani controlled?

2   A.   Yes.

3   Q.   How do you know that?

4   A.   I called D to kind of make sure he was

5   okay and he told me Arman placed him at another

6   property.

7   Q.   Did Arman Soltani know that D had been

8   held up at gunpoint on the property of Sierra

9   Townhomes?

10   A.   Yes.

11   Q.   How do you know that?

12   A.   I called him and told him myself.

13   Q.   You told Arman Soltani?

14   A.   Yes.

15   Q.   Did you know a courtesy officer at Sierra

16   Townhomes by the name of Lassiter?

17   A.   Yes.

18   Q.   Were you aware that Lassiter was

19   eventually fired by Arman Soltani?

20   A.   Yes.

21   Q.   Before Arman Soltani fired Lassiter, was

22   Lassiter ever a victim of crime at Sierra Townhomes?

23   A.   Yes.

24   Q.   What happened?

25   A.   He was held at gunpoint and he was jumped.

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 1         Q.    Did Arman Soltani know that Lassiter, the

 2    courtesy officer, had been jumped and held at

 3    gunpoint?

 4         A.    Yes.

 5              MR. CASEY:  Excuse me, objection as

 6         to form, lacking foundation.

 7    BY MR. BUTLER:

 8         Q.    All right.  Let me ask the question again.

 9              MR. BUTLER:  You can keep your

10         objection because I am not entirely sure

11         what my question was.

12         Q.    Did Arman Soltani know that the courtesy

13    officer, Lassiter, had been held at gunpoint and

14    jumped?

15         A.    Yes.

16         Q.    How do you know that?

17         A.    Angry residents would come into the

18    leasing office and inform him of what happened or

19    what occurred during the weekend or during, after,

20    you know, after business hours when the leasing

21    office was closed.

22         Q.    How do you --

23              MR. CASEY:  Excuse me, objection,

24         hearsay.

25    BY MR. BUTLER:
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1   Q.   How do you know that residents told

2   Soltani about Lassiter being held at gunpoint and

3   jumped?

4   A.   I was in the leasing office. We would

5   stand in the lobby or stand in the office, in the

6   actual office and residents would come in there and

7   let both of us know that, you know, that's what

8   happened.

9   Q.   So did you overhear the conversation where

10 residents told Arman Soltani that Lassiter had been

11 held at gunpoint and jumped?

12   A.   Yes.

13   MR. CASEY: Same objection, calls

14   for hearsay.

15   MR. BUTLER: Our response, to the

16   extent it is required, will be that it

17   shows notice, it is offered not for the

18   truth of the matter asserted.

19 BY MR. BUTLER:

20   Q.   We have talked a little bit about

21 Lassiter. Was Lassiter what Sierra Townhomes called

22 a, quote, courtesy officer, end quote?

23   A.   Yes.

24   Q.   There has been some dispute in this case

25 about the job of a, quote, courtesy officer, end

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1   quote, versus what a security guard would do. So

2   let me ask you this: Was Lassiter mostly focused on

3   security or mostly focused on other things?

4   A.   Other things.

5   Q.   Like what?

6   A.   Handing out letters, checking for the

7   lighting at the property.

8   Q.   Did Lassiter, who was what Sierra

9   Townhomes called a courtesy officer, confront people

10   when people were shooting off guns or committing

11   crimes at Sierra Townhomes?

12   A.   No.

13   MR. CASEY: Objection, foundation.

14   MR. BUTLER: Let me run it back.

15   And, Mr. Casey, you can keep your

16   objection.

17   MR. CASEY: Thank you.

18   BY MR. BUTLER:

19   Q.   Did Lassiter who was what Sierra Townhomes

20   called a quote, courtesy officer, end quote,

21   confront people when they were shooting off guns or

22   committing crimes at Sierra Townhomes?

23   A.   No.

24   Q.   How do you know that?

25   A.   He would write on the courtesy officer

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1   logs and we would highlight it and that's it. He

2   also came into the leasing office and told us that

3   he is not going to confront them because he did live

4   on site and we had the young thugs hanging there.

5   Q.   Did, just to make sure our pronouns are

6   clear when we play this, are you saying that

7   Lassiter came into the security office and said he

8   would not confront folks?

9   A.   Yes.

10   Q.   Was Arman Soltani aware that Lassiter

11   would not confront folks?

12   A.   Yes.

13   Q.   How do you know that?

14   A.   He would come in there and we would have

15   courtesy officer meetings and it would be

16   Mr. Lassiter, myself and Arman and we would discuss

17   any of the crime that kind of happened at Sierra

18   Townhomes. He then told us he is not going to

19   confront anyone, he would write it on the log, and

20   then we would give it to Arman.

21   Q.   Let me ask you another question. Did you

22   know that people shot guns at Sierra Townhomes?

23   A.   When I was there, I didn't have any

24   experience of them shooting guns while I was there.

25   But residents would inform us that after business

Page 15

1   hours a lot of different criminal activity would

2   take place.

3   Q.   When you say us in that preceding

4   sentence, do you mean the folks who worked at Sierra

5   Townhomes?

6   A.   The employees, yes.

7   MR. CASEY: Excuse me, let me again

8   interpose an objection to the hearsay

9   testimony.

10   MR. BUTLER: Our response would be

11   the same.

12   BY MR. BUTLER:

13   Q.   And I apologize if this sounds repetitive,

14   Ms. Castillo, but did residents at Sierra Townhomes

15   ever complain to people who worked at Sierra

16   Townhomes about the amount of crime on the property?

17   A.   Yes.

18   Q.   Did they complain to Arman Soltani?

19   A.   Yes.

20   MR. CASEY: Again, objection, based

21   on a lack of foundation and hearsay.

22   BY MR. BUTLER:

23   Q.   Did you hear them complain to Arman

24   Soltani?

25   A.   Yes.

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1   Q.   Did they complain to you?

2   A.   Yes.

3   Q.   Did you let Arman Soltani know there was

4   crime going on at Sierra Townhomes?

5   A.   Yes.

6   Q.   Did residents sometimes complain in

7   writing about the crime at Sierra Townhomes?

8   A.   One that I know of.

9   (Plaintiff's Exhibit 18 was marked for

10   identification.)

11   BY MR. BUTLER:

12   Q.   I will show you what I have marked as

13   Plaintiff's Exhibit 18.

14   MR. CASEY: Thank you.

15   BY MR. BUTLER:

16   Q.   And I will represent to you that this

17   document which has already been kind of talked about

18   at depositions is an email chain that came about as

19   a part of a Craigslist ad for Sierra Townhomes.

20   Turn with me, if you will, to the second

21   page of Plaintiff's Exhibit 18. You will see some

22   highlighted text. I am going to read that and then

23   the first question I ask you will be whether I read

24   it correctly.

25   "There are gang members living here

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1   shooting guns and causing problems. Somebody got

2   murdered by the mailbox and the guys who did it

3   still walking around. There is a full blown

4   prostitution apartment going on in the A building."

5   Did I read that right?

6   A.   Yes.

7   Q.   Were the things that I just read true?

8   A.   Yes.

9   Q.   Now, you can see at the, at the, sort of

10   bottom of Page 2, this came from a Craigslist ad, do

11   you see that?

12   A.   Yes.

13   Q.   Is Craigslist, in case some people in the

14   jury don't know, like an online website where people

15   list apartments kind of like the classified ads in

16   the newspapers?

17   A.   Yes.

18   Q.   And flip with me, if you will, to the

19   first page. And at the top there you can see

20   highlighted what the name of that Craigslist ad was.

21   Would you read that to us?

22   A.   "Come to where everyone wants to live."

23   Q.   And this is an email, under that it says

24   it is from Sierra Townhomes -- excuse me,

25   sierra.townhomes@yahoo.com; is that right?

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1   A.   Correct.

2   Q.   I wanted to ask you about some security

3   measures at Sierra Townhomes. First, the general

4   question, when you were there, what was security

5   like at Sierra Townhomes?

6   A.   We didn't have security.

7   Q.   Did residents at Sierra Townhomes ever

8   talk about the need for more security to the extent

9   that you know?

10   A.   Yes.

11   Q.   Did residents or people who lived at

12   Sierra Townhomes ever ask Arman Soltani about

13   getting more security?

14   A.   Yes.

15   Q.   Do you know that because you overheard it?

16   A.   I was standing in the room.

17   Q.   How many entrances were there where cars

18   could drive into Sierra Townhomes?

19   A.   Two.

20   Q.   How many gates were there?

21   A.   One.

22   Q.   Did people who worked at Sierra Townhomes

23   ever ask Arman Soltani for an additional gate?

24   A.   Yes.

25   Q.   Did he ever add an additional gate?

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1   A.   No.

2   Q.   I want to ask you about cameras. Were

3   there any working security cameras at Sierra

4   Townhomes?

5   A.   No.

6   Q.   Did residents or people who worked at

7   Sierra Townhomes ever talk about the need for

8   working security cameras?

9   A.   Yes.

10   Q.   Did people who worked at Sierra Townhomes

11   ask Arman Soltani for working cameras?

12   A.   We wouldn't because he didn't repair the

13   gate, he didn't repair any of the smaller issues in

14   the apartments so we knew he wasn't going to make

15   that large expense to purchase cameras.

16   MR. CASEY: Objection,

17   responsiveness.

18   BY MR. BUTLER:

19   Q.   Is the answer you just gave, does that

20   describe why -- strike that.

21   Were there often lights at Sierra

22   Townhomes that didn't work?

23   A.   Yes.

24   Q.   Did residents or people who worked at

25   Sierra Townhomes ever talk about the need for lights

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1   that actually worked?

2   A.   Yes.

3   Q.   Did residents or people who lived or --

4   excuse me, strike that.

5   Did residents or people who worked at

6   Sierra Townhomes ever ask Arman Soltani about

7   improving the lights?

8   A.   Yes.

9   Q.   How do you know that?

10   A.   Residents, like I said, residents would

11   come in and I would be standing there when they

12   would be angry and requesting the lights to be

13   working. We would speak with Ms. Tanya Richardson

14   in regards to the light, if they can add more

15   lights, replace the light bulbs, just kind of make

16   it a little bit brighter for everyone.

17   Q.   Did Arman Soltani ever make it where the

18   lights worked better at Sierra Townhomes?

19   A.   No.

20   Q.   Was there a fence around Sierra Townhomes?

21   A.   Yes.

22   Q.   Was there a gap in that fence?

23   A.   Yes.

24   Q.   Where was the gap?

25   A.   On the back of the property connecting to

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 1   the townhomes right beneath Sierra, I am sorry,

 2   right behind Sierra Townhomes.

 3   Q.   To the extent that you know from your time

 4   at Sierra Townhomes, were those townhomes on the

 5   other side of the gap in the fence a dangerous area?

 6   A.   They were.

 7   Q.   Did Arman Soltani ever fix the gap in that

 8   fence?

 9   A.   No.

10   Q.   Did he do anything about it?

11   A.   He asked our maintenance guys to cover it

12   up with mulch and branches to make a hill high

13   enough to where the residents or the people that

14   lived over at the townhomes couldn't get through or

15   had to jump high enough to get through the gates.

16   Q.   Did Arman Soltani or anyone at Sierra

17   Townhomes ever actually repair the fence?

18   A.   No.

19   Q.   Did you ever ask Arman Soltani about

20   security measures?

21   A.   Yes.

22   Q.   I think we have talked about how you were

23   present when other people asked Soltani about

24   security measures; is that right?

25   A.   Correct.

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1   Q.   How would Arman Soltani react when you or

2   someone else asked him about security measures?

3   A.   He would laugh, he wouldn't give us a

4   direct answer, he would kind of just brush us off.

5   Q.   I want to ask you some questions about

6   Arman Soltani's credibility or truthfulness but,

7   because of the way the rules are written I don't

8   want you to give me examples just yet, if the

9   defense lawyer wants specific examples he has the

10   right to ask for them when he asks you questions.

11   So right now let me just ask you this: In

12   your opinion, is Arman Soltani an honest, truthful

13   and credible person?

14   A.   No.

15   Q.   Around Sierra Townhomes did Arman Soltani

16   have a reputation for being honest, truthful and

17   credible?

18   A.   No.

19   Q.   What was Arman Soltani's reputation with

20   regard to whether he was honest, truthful and

21   credible?

22   A.   The opposite of being honest, he was not

23   honest at all.

24   Q.   In your opinion was Arman Soltani honest,

25   truthful and credible or not?

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                                                    Page 23

1   A.   He was not.

2   Q.   Did Sierra Townhomes have written records

3   of the crimes and security problems that occurred on

4   the property?

5   A.   Yes.

6   Q.   What were those records?

7   A.   The courtesy officer logs that the

8   courtesy officer who turn in daily.

9   Q.   What happened to those courtesy officer

10   logs, did folks keep them or what?

11   A.   Yes, there were, there were two binders

12   full of logs when I was employed with him.

13   Q.   Two, are you talking about binders, like

14   three-ring binders kind of things?

15   A.   Yes, three-ring binders.

16   Q.   How many were there?

17   A.   Two of them.

18   Q.   Is that where all the courtesy officer

19   logs went?

20   A.   Yes.

21   Q.   Was there a courtesy officer log filled

22   out for every single day?

23   A.   Yes.

24   Q.   Did those courtesy officer logs show the

25   crimes that occurred on the property, the

Page 24

1   confrontations on the property and other security

2   problems for each day?

3   A.   Yes.

4   (Plaintiff's Exhibit 19 was marked for

5   identification.)

6   BY MR. BUTLER:

7   Q.   I am going to show you now a stack of

8   paper and I have marked it as Plaintiff's Exhibit

9   19.   And I am going to represent to you --

10   MR. CASEY: Thank you.

11   Q.   -- that this paper is all the courtesy

12   officer logs that Sierra Townhomes and Arman Soltani

13   have provided in this case up through your last day

14   at Sierra Townhomes.   Now, pick that paper up and

15   sort of show it to the camera so that they can see

16   how thick it is.

17   (Witness complies.)

18   Q.   All right.   Just describe, were the

19   binders that you recall and that you were just

20   talking about that contained all the courtesy

21   officer logs and the records of crimes and stuff,

22   bigger or smaller than the paper in Plaintiff's

23   Exhibit No. 19?

24   A.   A lot bigger.

25   Q.   A lot bigger?

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1   A.   Yes.

2   MR. BUTLER: Let's go off video for

3   a second.

4   THE VIDEOGRAPHER: Sure.   The time

5   is 11:17 a.m., and we are now off the

6   record.

7   (Off the video record.)

8   MR. BUTLER: What I am going to do

9   now is I am going to give Ms. Castillo a

10   ream of paper and I am going to ask you

11   to approximate the size of the binder.   I

12   guess I will give you two reams, one for

13   each binder.   Is that good?

14   THE WITNESS: That's good.

15   MR. BUTLER: That would be my next

16   question.   And then once that is done, I

17   will ask you to stack them right here,

18   and then I will ask, Deidre, for you to

19   take a shot of that, if you will.   I will

20   also take a picture of it with my own

21   iPhone.   And I will deal with making that

22   an exhibit a little bit later.

23   Let's go back on video.

24   THE VIDEOGRAPHER: Please stand by.

25   The time is 11:18 a.m., and we are

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1   now back on the record.

2   BY MR. BUTLER:

3   Q.   In fact, Ms. Castillo, if you look at

4   Plaintiff's Exhibit 19 on the left side of the page,

5   do you see three little marks?

6   A.   The ring binder, these marks?

7   Q.   Yes. Describe what those are.

8   A.   They are binder marks.

9   Q.   Does it appear to be the kind of mark that

10 would be made if you photocopied something that used

11 to be in a binder?

12   A.   Yes.

13   Q.   Now I am going to hand you -- you

14 described for us two binders that contained all

15 these records of crimes and confrontations, right?

16   A.   Correct.

17   Q.   I am going to hand you two reams of paper,

18 and by ream I just mean this pack of 500 sheets that

19 you buy when you need something for your copier.

20 And I will ask you to go into them and pull out

21 enough pages to where it will be as thick as the

22 binder that, binders that you saw, if you could do

23 that for us now, please.

24   (Witness complies.)

25   A.   The first binder was about this big and

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1 then when I left the second one was probably like

2 that much of it.

3   Q.   Ms. Castillo, our kind videographer,

4 Ms. Deidre, has now got the camera focused, so point

5 to these stacks, if you will, and tell us what we

6 are looking at here.

7   A.   This stack is the stack that you presented

8 to me that Arman handed over to you guys. When I

9 was employed with Arman Soltani, the first binder

10 was about this thick and the second one upon me

11 leaving was about this thick.

12   Q.   So the first binder you said is

13 represented by the stack in the middle of the table?

14   A.   Correct.

15   Q.   And then the stack on your right and the

16 jury's left is the second binder that was being

17 built when you left?

18   A.   Correct.

19   Q.   I am going to now take a picture of that

20 with my iPhone here. And, smile for the camera.

21   We will make that an exhibit a little bit

22 later.

23   All right, thank you. I will clean up

24 your space some. Okay.

25   Have I separated them right?

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1   A.   Yes.

2   Q.   Have you, did you ever -- well, strike

3   that.

4   Ms. Castillo, do you know where those

5   binders that contained the records of crimes and

6   confrontations are now?

7   A.   No.

8   Q.   Have you ever heard anyone who worked for

9   Sierra Townhomes talk about destroying those

10   binders?

11   A.   No.

12   Q.   Do you have any idea what happened to

13   them?

14   A.   No.

15   Q.   Do you know whether Arman Soltani ever saw

16   the records of crimes and confrontations and

17   security problems that were contained in those

18   binders?

19   A.   Yes.

20   Q.   How do you know?

21   A.   I would scan and email them to him daily,

22   email them to him daily.

23   Q.   Is that every day you would send the

24   courtesy officer log?

25   A.   Yes.

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1   Q.   Would you do anything to the courtesy

2   officer log before you emailed a copy?

3   A.   We would highlight anything that occurred

4   or any altercation that Mr. Lassiter had with any

5   type of resident, also any lighting that was out.

6   Q.   Would you email those highlighted copies

7   to Mr. Soltani?

8   A.   Yes.

9   Q.   Did you send them to Mr. Soltani's

10 personal account namra97@aol.com, which is N-A-M-R-A

11 97@aol.com?

12   A.   Yes.

13   Q.   Did Mr. Soltani ever say, you know, whoa,

14 this is too much crime, we better do something about

15 this?

16   A.   No.

17   Q.   Did he ever acknowledge to you that there

18 was a lot of crime going on at Sierra Townhomes?

19   A.   No.

20   Q.   I want to ask you some questions about

21 people who were thinking about moving into Sierra

22 Townhomes.

23   Did you ever talk with folks who were

24 considering moving into Sierra Townhomes and sort of

25 show them around the property?

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1   A.   Yes.

2   Q.   When you did that, did you ever talk with

3   them about safety and crime on the property?

4   A.   Yes.

5   Q.   What would you tell those folks?

6   A.   To not move at Sierra Townhomes, it was

7   not a safe community to bring a family into.

8   Q.   Did you ever hear Arman Soltani issue a

9   similar warning to anybody about crime and security

10 at Sierra Townhomes?

11   A.   No.

12   Q.   While you were at Sierra Townhomes, did

13 you ever know Arman Soltani or anyone else who

14 worked for Sierra Townhomes other than you to warn

15 residents about the crime going on on the property?

16   A.   No.

17   Q.   Did Arman Soltani ever talk to people who

18 were thinking about moving into Sierra Townhomes?

19   A.   Yes.

20   Q.   What did Arman Soltani tell those people

21 about the crime going on at Sierra Townhomes?

22   A.   He would tell them that it is a safe

23 community, it is a gated community and we have a

24 courtesy officer that lives on site.

25   Q.   How do you know that's what Arman Soltani

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1   would say?

2   A.   One particular applicant, I was sitting at

3   the desk and he kind of stood over me and spoke to

4   her.

5   Q.   You mean Arman Soltani stood over you and

6   told that to the person who was thinking about

7   moving in?

8   A.   Yes, correct.

9   Q.   When Arman Soltani told people that Sierra

10   Townhomes was safe, did he know about the crime

11   going on at Sierra Townhomes?

12   A.   Yes.

13   MR. CASEY: Objection as to form,

14   foundation.

15   BY MR. BUTLER:

16   Q.   Let me ask it again.

17   MR. BUTLER: And, Mr. Casey, if you

18   will keep your standing objection. You

19   will have the same objection to this

20   question.

21   BY MR. BUTLER:

22   Q.   When Arman Sol -- let me start that one

23   more time.

24   When Arman Soltani told people that Sierra

25   Townhomes was safe, did he know about the crime

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1   going on at Sierra Townhomes?

2   A.   Yes.

3   Q.   How do you know that Arman Soltani knew

4   about the crime going on at Sierra Townhomes?

5   A.   He would be there when the angry residents

6   would come in and inform us of what happened or what

7   occurred during the weekend or after the leasing

8   office was closed. He would also receive the

9   courtesy officer logs daily.

10   Q.   That's in the emails you talked about?

11   A.   Correct.

12   MR. BUTLER: Let's go off video for

13   a second, we will stay on steno.

14   THE VIDEOGRAPHER: The time is 11:25

15   a.m. and we are now off the record.

16   (Off the video record.)

17   MR. BUTLER: Off the record.

18   (Discussion ensued off the record.)

19   THE VIDEOGRAPHER: The time is 11:25

20   a.m. and we are now back on the record.

21   BY MR. BUTLER:

22   Q.   Ms. Castillo, did Sierra Townhomes have

23   Section 8 residents living on the property?

24   A.   We did.

25   Q.   And when you say Section 8 are you

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1   referring to people who received vouchers or

2   monetary assistance from the government pursuant to

3   a Section 8 program to live on the property?

4   A.   Yes.

5   Q.   If you know from your time as an assistant

6   manager at Sierra Townhomes, did that money from

7   Section 8 from the government come to Sierra

8   Townhomes?

9   A.   It was direct deposited, yes.

10   Q.   Direct deposited to Sierra Townhomes?

11   A.   (Indicating affirmatively.)

12   Q.   Did Sierra Townhomes also have some

13   residents who were not receiving Section 8 money?

14   A.   Yes.

15   Q.   Or strike that. Did Sierra Townhomes also

16   have residents as to which Sierra Townhomes was not

17   receiving money from the Section 8 program?

18   A.   Yes.

19   Q.   To the extent you know from your time as

20   an assistant manager at Sierra Townhomes, did Sierra

21   Townhomes and Arman Soltani make more money from the

22   Section 8 residents or from the non-Section 8

23   residents?

24   A.   From the Section 8 residents.

25   Q.   Did you ever hear Arman Soltani say when

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 1   asked about security, quote, "As long as Section 8

 2   keeps paying it doesn't matter."

 3   A.   Yes.

 4   Q.   End quote.

 5   A.   Yes.

 6   Q.   Did you hear him say that just once or

 7   multiple times?

 8   A.   Multiple times.

 9   MR. BUTLER: Thank you. I have no

10   further questions.

11   I do want to put in, this is

12   Plaintiff's Exhibit 20, it is a

13   placeholder. What I will do is email

14   around that picture I just took, and then

15   we can sub it in for Plaintiff's 20.

16   MR. CASEY: Very good.

17   (Plaintiff's Exhibit 20 was deemed

18   marked for identification.)

19   MR. CASEY: What time does our last

20   depo start?

21   MR. RAFI: One. We are also going

22   to preserve demonstrative evidence here.

23   MR. BUTLER: Yes, all right. So

24   these two stacks of paper we will

25   preserve some way or another. I don't

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1   frankly --

2   MR. CASEY: Mark them.

3   THE VIDEOGRAPHER: Do you want to go

4   off the record?

5   MR. BUTLER: It is fine.

6   Yes, I guess we better mark them.

7   MR. RAFI: Yes.   As long as we -- if

8   that's how you all want to do it, that's

9   perfect.

10   MR. BUTLER: Feel kind of silly

11   marking blank pages.   There we go.

12   (Plaintiff's Exhibits 21 and 22 were

13   marked for identification.)

14   MR. RAFI: The larger stack is

15   marked 21.   I will let you talk.

16   MR. BUTLER: I will get hoarse if I

17   keep this up.

18   MR. RAFI: And the smaller stack is

19   marked 22.

20   MR. BUTLER: Mr. Rafi, are you

21   referring to the two stacks that were

22   used to represent the binders of courtesy

23   officer logs?

24   MR. RAFI: I am.   And this is my

25   life, being cross-examined all the time.

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1   MR. CASEY: Are we ready?

2   THE VIDEOGRAPHER: Okay.

3   MR. BUTLER: Go ahead, whenever you

4   are ready.

5   MR. CASEY: Are we on the record?

6   Okay.

7   EXAMINATION

8   BY MR. CASEY:

9   Q.   Good morning or afternoon, whichever it

10 may be.

11   A.   Almost afternoon probably.

12   Q.   My name is Bill Casey and I represent the

13 folks that have been sued in this case. I've got a

14 few questions for you.

15   A.   Sure.

16   Q.   The last time you worked at the property

17 was what month and what year?

18   A.   October 2014.

19   Q.   And the last time you would have seen the

20 courtesy officer's activity log would be?

21   A.   In October.

22   Q.   2014?

23   A.   2014, correct.

24   Q.   Now, Mr. Butler has referred to

25 Plaintiff's Exhibit, was that 19?

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1   A.   (Indicating affirmatively.)

2   Q.   And it said that it documented crimes,

3 confrontations and other activity?

4   A.   Correct.

5   Q.   Basically thumb through that, if you

6 would, just take a look at some parts of it.

7   I think you will agree with me that the

8 courtesy officers activity log also documents when

9 rounds were made and what observations were made and

10 that sort of thing, right?

11   A.   Correct.

12   Q.   What you are looking at is not just a

13 stack of documents that represent crimes,

14 confrontations and things of that sort, does it?

15   A.   Correct.

16   Q.   Now, do you know anything at all about

17 this incident that we are here about today?

18   A.   I don't. I know a gentleman was shot.

19   Q.   Okay. You don't know who the gentleman

20 was?

21   A.   No.

22   Q.   You don't know the circumstances under

23 which the shooting occurred?

24   A.   No.

25   Q.   You don't know whether it was daylight or

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1   nighttime?

2   A.   I don't.

3   Q.   You don't know whether he knew the guy

4   that shot him or not?

5   A.   I do not.

6   Q.   Where do you work now?

7   A.   I work at Landmark at Banyan Bay Apartment

8   Homes.

9   Q.   Where is that located?

10   A.   It is located off of Pleasantdale Road in

11   Doraville.

12   Q.   And is that a gated community?

13   A.   It is a gated community.

14   Q.   And do you have video surveillance

15   cameras?

16   A.   Not yet.

17   Q.   Are there, is there fence around the

18   property?

19   A.   There is.

20   Q.   Is there a hole in the fence?

21   A.   Not that we are aware of.

22   Q.   Have you had people enter the property

23   without permission since you have been working

24   there?

25   A.   Yes.

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1   Q.   And so the gates do not keep people out,

2   do they?

3   A.   They do not.

4   Q.   All right. And the fence you say has no

5   holes in it, correct?

6   A.   Not to my knowledge.

7   Q.   Back to this incident here, do you know

8   whether the person that is involved in this shooting

9   that actually pulled the trigger, do you know

10   whether he was a guest or a tenant of the property?

11   A.   I do not.

12   Q.   Do you know someone named Shanita

13   Jeffries?

14   A.   I do not.

15   Q.   Now, if you were to, at either your

16   current job or any other job involving property

17   management, if you noticed significant increase in

18   foot traffic at a particular apartment, when a

19   specific individual was there, would that give you

20   cause for concern?

21   MR. BUTLER: Objection --

22   A.   Yes.

23   MR. BUTLER: -- calls for

24   speculation.

25   BY MR. CASEY:

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 1        Q.    You may answer.

 2        A.    Yes.

 3        Q.    And the reason that would give you cause

 4   for concern would be because you might think that

 5   there is something illegal going on there, correct?

 6        A.    Correct.

 7              MR. BUTLER:   Same objection.

 8   BY MR. CASEY:

 9        Q.    Now, you said Mr. Lassiter said he was not

10   going to intervene, right?

11        A.    Correct.

12        Q.    But Mr. Lassiter had a cell phone, didn't

13   he?

14        A.    He did.

15        Q.    And Mr. Lassiter could call the police,

16   couldn't he?

17        A.    He could.

18        Q.    And Mr. Lassiter did call the police,

19   didn't he?

20        A.    Depending on which altercation.

21        Q.    Okay.  But it is not as if Mr. Lassiter

22   said, I am not going to do anything about whatever I

23   see; what he said was, I don't want to get

24   personally involved, I will call the police if I

25   need to?
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1   A.   His words to me and to Arman were he

2   wasn't going to confront anyone.

3   Q.   Personally?

4   A.   Correct.

5   Q.   The person involved in -- anyone involved

6   in any of the shootings that you, or crimes that you

7   have talked about, do you know how they gained

8   access to the property?

9   A.   No.

10   Q.   You don't know whether they walked on the

11   property or drove through the front gate, do you?

12   A.   I do not.

13   Q.   You don't know whether they crawled

14   through a hole in the fence or whether they came in

15   with a resident, do you?

16   A.   I do not.

17   Q.   In the email that you looked at part of

18   earlier, one of the exhibits you referred to earlier

19   today, you had responded to an email to Mr. and Mrs.

20   Tuggle, correct?

21   A.   I did not.

22   Q.   You did not?

23   A.   No.

24   Q.   And who utilized your email address for

25   that purpose?

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1   A.   I don't know.

2   Q.   You didn't write this email?

3   A.   I did not.

4   Q.   In that email, however, it does say that,

5   "Unfortunately, crime has no address and we are

6   doing all we can to make sure our residents are

7   safe." What does that mean to you, the phrase,

8   "crime has no address"?

9   MR. BUTLER: Hold on just a second.

10   Objection, relevance. This witness

11   has no knowledge about that, didn't write

12   it, and then I think there is a

13   foundation objection there too.

14   MR. CASEY: Okay.

15   BY MR. CASEY:

16   Q.   Have you ever heard the phrase,

17   "unfortunately, crime has no address"?

18   A.   I have.

19   Q.   And you would agree that that particular

20   phrase means to you that crime can happen

21   everywhere, right?

22   A.   Correct.

23   Q.   It can happen anywhere, correct?

24   A.   Correct.

25   Q.   How long have you been in property

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1   management in total?

2   A.   Five years.

3   MR. CASEY: Thank you, ma'am.

4   That's all I have for now.

5   THE WITNESS: Thank you.

6   MR. BUTLER: Give me a couple

7   seconds to get organized here.

8   All right. I don't know if you were

9   off video or not. Were you still

10   rolling? How much tape have we got left?

11   THE VIDEOGRAPHER: 50 minutes, five

12   zero.

13   MR. BUTLER: That will be plenty.

14   EXAMINATION (Continued)

15   BY MR. BUTLER:

16   Q.   All right. Ms. Castillo, you are looking

17   here at Plaintiff's Exhibit 19 which is the courtesy

18   officer activity logs that we talked about; is that

19   right?

20   A.   That's correct.

21   Q.   If we look, say, at the first page here,

22   what is the date on the bottom right?

23   A.   6/2/2013.

24   Q.   And if we go just to the next page, what

25   is the date of that?

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1   A.   June the 14th, 2013.

2   Q.   Are there some missing days between June 2

3   and June 14?

4   A.   Yes.

5   Q.   In your recollection, did the courtesy

6   officer activity logs come in for every single day?

7   A.   They did.

8   Q.   I wanted to ask you briefly about your

9   last day at Sierra Townhomes. It was my

10 recollection that it was August 29 of 2014, was your

11 last day, could that be right?

12   A.   That could --

13   MR. CASEY: Objection, leading.

14   A.   -- possibly be right.

15 BY MR. BUTLER:

16   Q.   Okay. Just --

17   A.   August, no, October would have been my

18 last day.

19   Q.   So you think October rather than August?

20   A.   Correct.

21   MR. BUTLER: Would you print off

22   some more stuff?

23   All right. We are going to have to

24   add to -- hold on, Mike, let me give

25   you -- all right, we are going to have to

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1   redo some stuff then.

2   MR. CASEY: Should we go off the

3   record?

4   MR. BUTLER: Yes, we probably

5   should. We'll do it right here.

6   THE VIDEOGRAPHER: The time is 11:37

7   a.m., and we are now off the record.

8   (Discussion ensued of the record.)

9   THE VIDEOGRAPHER: The time is 11:38

10   a.m. and we are now back on the record.

11 BY MR. BUTLER:

12   Q.   Ms. Castillo, the defense lawyer asked you

13 some questions about Lassiter, do you remember those

14 questions?

15   A.   Yes.

16   Q.   Talking about whether Lassiter had a cell

17 phone so he could call 911, do you remember that?

18   A.   Yes.

19   Q.   At the time that Lassiter was there was he

20 Sierra Townhomes' only courtesy officer?

21   A.   Yes.

22   Q.   Did they have a security guard or anybody

23 other than Lassiter?

24   A.   No.

25   Q.   Was this the same Lassiter who said he was

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1   unwilling to confront people committing crimes at

2   Sierra Townhomes?

3   A.   Yes.

4   Q.   Did, if you call 911, do the police arrive

5   instantly --

6   A.   No.

7   Q.   -- or does it take a minute?

8   A.   It takes a while.

9   Q.   You were asked some questions about the

10   new apartment complex where you work now, do you

11   remember those questions?

12   A.   Correct, yes.

13   Q.   Is there as much crime going on there as

14   there was at Sierra Townhomes?

15   A.   No.

16   Q.   Is it close?

17   A.   No.

18   Q.   Are residents reasonably safe at the new

19   apartment complex?

20   A.   Yes.

21   MR. CASEY: Objection as to form.

22   Lacking foundation.

23   MR. BUTLER: Let me ask that again,

24   you will have that same standing

25   objection to that question and the one

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1   following it, because I know you are

2   going to object to the same thing.

3   BY MR. BUTLER:

4   Q.   Were -- strike that. Are residents and

5   their guests at the apartment complex where you work

6   now reasonably safe?

7   A.   Yes.

8   Q.   Was that true at Sierra Townhomes?

9   A.   No.

10   Q.   You were asked some about this Craigslist

11   ad and email exchange, do you remember those

12   questions?

13   A.   Yes.

14   Q.   I will show you again Plaintiff's Exhibit

15   No. 18. Is that what we were talking about?

16   A.   Yes.

17   (Plaintiff's Exhibit 23 was marked for

18   identification.)

19   BY MR. BUTLER:

20   Q.   I am going to show you now another email

21   involving or from Sierra Townhomes, and I have

22   marked it as Plaintiff's Exhibit 23. I only have

23   one copy of this, I will let Mr. Casey take a look

24   at it and then I will ask you questions about it.

25   Now, with respect to Plaintiff's Exhibit

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1   18, the Craigslist ad and email exchange, it has got

2   your name at the bottom of Page 1, doesn't it?

3   A.   Correct.

4   Q.   But did you write the email shown on Page

5   1?

6   A.   I did not.

7   Q.   How did your name come to be at the bottom

8   of it if you know?

9   A.   I had a signature set up while I was an

10   employee there with them and if they didn't change

11   it after I left, every email that went out after my

12   last day would have had that exact same signature.

13   Q.   Well, let me show you Plaintiff's Exhibit

14   23. Is that an email exchange between Arman Soltani

15   and Sierra Townhomes?

16   A.   Yes.

17   Q.   What is the date on that email exchange in

18   Plaintiff's Exhibit 23?

19   A.   December 29, 2014.

20   Q.   Were you still working at Sierra Townhomes

21   at that time?

22   A.   No.

23   Q.   But is that still your name at the bottom

24   of Page 1 on Plaintiff's Exhibit 23?

25   A.   Yes.

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1   Q.   So, but did you write the email --

2   A.   I --

3   Q.   -- in Plaintiff's Exhibit 23?

4   A.   I did not.

5   Q.   Well, let's look back at Plaintiff's

6   Exhibit 18, the Craigslist ad and email exchange

7   that we were talking about, is this the one, is that

8   the one that you did not write; is that correct?

9   A.   Correct.

10   Q.   Let's look at what it says. It says in

11   here, let's see, in the paragraph there at the

12   bottom beginning with the word, "we", which is under

13   my thumb, I am going to read and ask you to read

14   with me. It says, quote, "We are doing all we can

15   to make sure our residents are safe."

16   Did I read that correctly?

17   A.   Yes.

18   Q.   Was that true?

19   A.   No.

20   Q.   Was Sierra Townhomes doing all it could to

21   keep its residents safe?

22   A.   No.

23   Q.   Did Sierra Townhomes, to your knowledge,

24   ever put in a second gate?

25   A.   No.

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1   Q.   Did Sierra Townhomes, to your knowledge,

2   ever hire a real security guard, that is, one

3   focused on security, not just handing out letters

4   and stuff like a courtesy officer?

5   A.   No.

6   Q.   Did Sierra Townhomes, to your knowledge,

7   ever put in real security cameras?

8   A.   No.

9   Q.   Did Arman Soltani or Sierra Townhomes, to

10   your knowledge, ever fix the gap in that fence --

11   A.   No.

12   Q.   -- that we talked about.

13   MR. BUTLER: Let's go off record

14   now.

15   THE VIDEOGRAPHER: The time is 11:43

16   a.m., and we are now off the record.

17   (Discussion ensued off the record.)

18   MR. BUTLER: Let's go on steno, off

19   video.

20   (Off the video record.)

21   MR. BUTLER: What I will do if it

22   suits Mr. Casey is take these additional

23   courtesy officer logs and add them to

24   Plaintiff's Exhibit 19.

25   MR. CASEY: Okay.

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1   MR. BUTLER: You can look at them

2   first if you want.

3   MR. CASEY: Sure. So we are just

4   going to add something to it?

5   MR. BUTLER: Yes, because I had the

6   wrong date that Ms. Castillo quit working

7   there.

8   MR. CASEY: Okay.

9   MR. BUTLER: The one at the end of

10   that are a little out of order, so it

11   actually ends with July but it goes

12   though --

13   MR. RAFI: October 29th, everything

14   we have up until October 29, 2014 that

15   Sierra Townhomes produced.

16   MR. BUTLER: Let me do this, and

17   clip it.

18   Let's go on video.

19   THE VIDEOGRAPHER: The time is 11:45

20   a.m. and we are now back on the record.

21 BY MR. BUTLER:

22   Q.   All right. Ms. Castillo, I made a mistake

23 earlier about your last day. I thought your last

24 day was in August 2014 but you said it was October

25 2014. In order then to have the correct amount of,

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1   number of pages that we received from Sierra

2   Townhomes and Arman Soltani to represent the

3   courtesy officer logs up until your final time at

4   Sierra Townhomes, I had to add some pages to

5   Plaintiff's Exhibit 19. Have I done that during our

6   break?

7   A.   Yes.

8   Q.   All right. In front of you now, in

9   Plaintiff's Exhibit 19 is a full, I will represent

10   to you, is a full collection of all the courtesy

11   officer activity logs that Sierra Townhomes and

12   Arman Soltani produced to us through the time that

13   you stopped working at Sierra Townhomes.

14   A.   Okay.

15   Q.   Now let's do that comparison again, so we

16   have a clear record. Push that to your left, if you

17   will.

18   And I will now show you Plaintiff's

19   Exhibit 21 and also Plaintiff's Exhibit 22. Now,

20   walk us through, if you will, as soon as the, we

21   will get Ms. Deidre to focus on that.

22   THE VIDEOGRAPHER: Okay.

23   BY MR. BUTLER:

24   Q.   And walk us through, pointing with your

25   hand if you will, what those stacks represent?

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1   A.   On the left is the paperwork we just

2   discussed, the reports given to you all.   In the

3   middle is the first courtesy officer log while I was

4   an employee with Arman Soltani and the second one is

5   the second binder we were building upon me leaving,

6   this was in the works.

7   Q.   So let me go back through and ask some

8   questions just to clarify for the jury and from the

9   jury's perspective they will be watching this video.

10 On your left and the jury's right those are the logs

11 that were given to us in this case by Arman Soltani

12 and Sierra Townhomes, is that your understanding?

13   A.   Yes.

14   Q.   In the middle there, there is Plaintiff's

15 Exhibit No. 21, there is the stack of that paper in

16 Plaintiff's Exhibit 21 in the middle in front of you

17 representing the size of the first binder that

18 contained all the crimes, confrontations and notices

19 of security problems?

20   A.   Yes.

21   Q.   And does the stack on your right and on

22 the jury's left represent the size of the second

23 binder that Sierra Townhomes had collecting all the

24 information about crimes, confrontations and

25 security problems?

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1   A.   Yes.

2   Q.   Thank you. I will now take a picture of

3   you and those three stacks. So smile for me. Okay.

4   Thank you.

5   Ms. Castillo, we have been sitting here

6   now for a while and I thank you for your time. Are

7   you being paid to be here today?

8   A.   No.

9   Q.   Why are you here?

10   A.   To seek justice for the gentleman that was

11   shot. I don't personally know him but I worked with

12   Arman and I know what type of person he is and just

13   to get some justice for the gentleman that got shot

14   and what happened to him.

15   MR. BUTLER: Thank you. I have no

16   further questions.

17   EXAMINATION (Continued)

18   BY MR. CASEY:

19   Q.   And if justice were to dictate that the

20   apartment complex is not responsible for this

21   shooting, you would, you would be okay with that if

22   it happened to turn out that way, wouldn't you?

23   MR. BUTLER: Objection, relevance.

24   BY MR. CASEY:

25   Q.   Go ahead.

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1   A.   No, because I worked for Arman Soltani and

2   he doesn't care for anyone except himself.

3   Q.   You don't like Arman Soltani?

4   A.   Not that I don't like him, he's a nice

5   person. He was nice to me while I was employed with

6   him, but the way he did things, I didn't agree with,

7   with me being in the business for as long as I have

8   been in the business, I know right from wrong, and

9   he was doing a lot of wrong.

10   MR. CASEY: I am going to object to

11   the responsiveness of that answer.

12   BY MR. CASEY:

13   Q.   My question is: You agree you don't like

14   Arman Soltani, correct?

15   A.   I don't agree.

16   Q.   You don't? You like him?

17   A.   He was nice to me. I don't have anything

18   personal against him.

19   Q.   Do you like him?

20   MR. BUTLER: Asked and answered. I

21   object.

22   A.   No.

23   MR. CASEY: I will submit that it

24   has not been answered.

25   BY MR. CASEY:

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     1   Q.   Do you like him or not, ma'am?

     2   MR. BUTLER: Asked and answered for

     3   the fourth time.

     4   BY MR. CASEY:

     5   Q.   Go ahead.

     6   A.   No, I guess.

     7   Q.   Okay. Back to where you are now working

     8   and what you are doing there, I think you told us

     9   there is a complete fence around the property,

    10   right?

    11   A.   Correct.

    12   Q.   And there is a gate that works, correct?

    13   A.   Correct.

    14   Q.   And is there a security guard?

    15   A.   We have a security company that comes out.

    16   Q.   And they come out and do patrols at

    17   various times?

    18   A.   Various times.

    19   Q.   And they do them at different times of the

    20   day, they don't have a set schedule, do they?

    21   A.   Correct.

    22   Q.   And the reason they do that is because

    23   they don't want, the goal there is so that their --

    24   they won't be patterned as to when they will be

    25   there and when they won't be there, correct?

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 1         A.    Correct.

 2               MR. BUTLER:  Objection, foundation,

 3         calls for speculation.

 4    BY MR. CASEY:

 5         Q.    Are you familiar with why the security

 6    guards at the property where you now work come at

 7    varying schedules?

 8         A.    I am.

 9         Q.    Okay.  And the reason they come at varying

10    schedules is so that their time coming to the

11    property and leaving the property can't be patterned

12    or predicted, correct?

13               MR. BUTLER:  Same objections.

14         A.    Correct.

15    BY MR. CASEY:

16         Q.    Okay.  And do you have courtesy officers

17    at that location?

18         A.    Yes.

19         Q.    How many -- do the courtesy officers, do

20    they live on site?

21         A.    They do not.

22         Q.    Does the, how many hours a day do you have

23    the security company there with security guards?

24         A.    About five to six hours a day.

25         Q.    And do they have one or two that come
```

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1   there?

2   A.   We have a total of five.

3   Q.   Five.

4   A.   At different times.

5   Q.   Right. But at any given shift how many

6   times would you, I mean, how many guards would you

7   expect to be there?

8   A.   One to two.

9   Q.   And they patrol the office -- the

10   property, rather, routinely?

11   A.   Correct.

12   Q.   And have you had crime at that property?

13   A.   Not since we have taken over, no.

14   Q.   Not one single crime?

15   A.   No.

16   Q.   And do you have the same security company

17   there now that was on the property before you took

18   it over?

19   A.   No.

20   Q.   Excuse me.

21   You gave us the address of that property,

22   what is it?

23   A.   It is located off of Pleasantdale Road in

24   Doraville. Do you need the actual address?

25   Q.   Yes, ma'am, what is the street --

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1   A.   3497 Meadow Glen Village Lane.

2   Q.   And you have been there how long?

3   A.   I have been there since July 24th.

4   MR. CASEY: All right, ma'am, thank

5   you very much.

6   THE WITNESS: No problem.

7   MR. BUTLER: I have just a few more

8   questions.

9   EXAMINATION (Continued)

10   BY MR. BUTLER:

11   Q.   Ms. Castillo, you said the property where

12   you now worked, did you say there was a security

13   company that worked there?

14   A.   Yes.

15   Q.   Was there a similar security company at

16   Sierra Townhomes?

17   A.   No.

18   Q.   How many, how many security personnel did

19   you say there were that came at different times to

20   the property where you now work?

21   A.   One to two.

22   Q.   And have any of them ever been jumped and

23   held at gunpoint on the property?

24   A.   No.

25   Q.   Is that what happened to Lassiter at

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1   Sierra Townhomes?

2   A.   Yes.

3   Q.   At the new property where you now work

4   where you have the security company and all the

5   other things we have talked about, has there been

6   crime at anywhere near the levels that there was at

7   Sierra Townhomes when you were there?

8   A.   No.

9   MR. BUTLER: Thank you.   No further

10   questions.

11   EXAMINATION (Continued)

12   BY MR. CASEY:

13   Q.   How would you describe the neighborhood

14   where you now work versus the neighborhood where

15   Sierra Townhomes is located?

16   A.   The neighborhood where I now work, it's,

17   to me safe, I moved on site, it is safe, I have a

18   two-year-old daughter.   At Sierra Townhomes the

19   crime was bad.   It was at the end of Godby Road.

20   And then with Arman not taking the correct security

21   measures to ensure everyone was safe, it is a lot

22   safer where I am currently working.

23   Q.   My question, though, ma'am is: In

24   general, not just the apartment complex itself --

25   A.   That area.

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1   Q.   -- the property itself, but the area in

2   general, where you live now is a far better area,

3   correct?

4   A.   Yes.

5   Q.   Than Godby Road down in College Park,

6   correct?

7   A.   Yes.

8   MR. CASEY: Thank you, ma'am.

9   EXAMINATION (Continued)

10   BY MR. BUTLER:

11   Q.   Did Arman Soltani know about the area

12   where Sierra Townhomes was located?

13   A.   Yes.

14   Q.   Did he do the things necessary to keep his

15   residence and their guests safe?

16   MR. CASEY: Objection as to form --

17   A.   No.

18   MR. CASEY: -- foundation, calls for

19   a legal exclusion --

20   MR. BUTLER: All right.

21   MR. CASEY: -- conclusion, excuse

22   me.

23   MR. BUTLER: You keep those

24   objections, they are preserved.

25   BY MR. BUTLER:

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1   Q.   At your time at Sierra Townhomes, did

2   Arman Soltani do the things necessary to keep

3   residents and their guests safe?

4   A.   No.

5   MR. BUTLER: Nothing further.

6   MR. CASEY: Thank you, ma'am.   Have

7   a good day.

8   THE WITNESS: Thank you.

9   THE VIDEOGRAPHER: This is the end

10   of Disc One in the deposition of

11   Cassandra Castillo.   The time is 11:54

12   a.m. and we are now off the record.

13

14   (Deposition concluded at 11:54

15   a.m.)

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1   C E R T I F I C A T E

2

    G E O R G I A:

3

    HENRY COUNTY:

4

            I hereby certify that the foregoing
5   deposition was reported, as stated in the
        caption, and the questions and answers
6   thereto were reduced to the written page
        under my direction; that the foregoing
7   pages 1 through 62 represent a true and
        correct transcript of the evidence given.
8   I further certify that I am not in any
        way financially interested in the result
9   of said case.
            Pursuant to Rules and Regulations of
10   the Board of Court Reporting of the
        Judicial Council of Georgia, I make the
11   following disclosure:
            I am a Georgia Certified Court
12   Reporter. I am here as an independent
        contractor for Veritext.
13   I was contacted by the offices of
        Veritext to provide court reporting
14   services for this deposition. I will not
        be taking this deposition under any
15   contract that is prohibited by O.C.G.A.
        15-14-37 (a) or (b).
16   I have no written contract to provide
        reporting services with any party to the
17   case, any counsel in the case, or any
        reporter or reporting agency from whom a
18   referral might have been made to cover
        this deposition. I will charge my usual
19   and customary rates to all parties in the
        case.
20
        This, the 15th day of December, 2015.
21

22

23

24

25   RICHARD BURSKY, RMR, CRR, RPR, CCR-2509

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