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IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

CHRISTINE LYNN LYNDE,
Plaintiff,

vs. Case No. 1516-CV25920

JACKSON COUNTY,
Defendant.

VOLUME 3
VIDEOTAPED DEPOSITION OF
CHRISTINE LYNDE,

taken on behalf of the Defendant, pursuant to
Notice to Take Deposition, beginning at 9:05 a.m.
on the 28th day of March, 2018, at the law offices
of Seyferth Blumenthal & Harris, LLC, 4801 Main
Street, Suite 310, in the City of Kansas City,
County of Jackson, and State of Missouri, before
Cameron L. Preheim, Certified Court Reporter.



1 THE VIDEOGRAPHER: Good morning. My name
 2 is Patrick Robinson with Testimonial Video. Today
 3 is Wednesday, March 28th and we will go on the
 4 record at 9:05 a.m. We are here to take the video
 5 recording of deposition in Case No. 1516-CV25920.
 6 In the Circuit Court of Jackson County, Missouri.
 7 Will counsel state their name and affiliation for
 8 the record, please.

9 MR. PORTO: Plaintiff with counsel Thomas
 10 Porto.

11 MR. HARRIS: Charlie James Harris, Jr.,
 12 for Jackson County.

13 THE VIDEOGRAPHER: And Cameron Preheim is
 14 our court reporter today. Would you please swear
 15 the witness.

16 CHRISTINE LYNDE,
 17 called as a witness on behalf of the Defendants,
 18 was sworn and testified as follows:

19 DIRECT-EXAMINATION

20 BY MR. HARRIS:

21 Q. Now, Miss -- Miss Lynde, I'm not going to
 22 go over the instructions we went through before
 23 because you've had your deposition with me and
 24 there is maybe a little bit of a rhythm so you
 25 know the cadence in which I ask questions. I sort



1 question so we're not actually discussing, but,
2 yes, we mentioned Mike in the text messages.

3 Q. Okay. And when it says here we actually
4 only hung up because he thought you were texting
5 him. You understood that to mean that she is
6 referring to Mike Sharp, correct?

7 A. Yes, I would think so.

8 Q. And you didn't correct her and say wait a
9 minute. I don't text Mike Sharp?

10 A. No, I didn't say that.

11 Q. And the reason why you didn't is because
12 you indeed did text Mike Sharp, didn't you?

13 A. I'm -- 2013. I don't know.

14 Q. You don't know?

15 A. I can't -- I can't answer that.

16 Q. Well, the fact of the matter is you and
17 the Sheriff sent text messages to each other
18 between 2013 and 2018, didn't you?

19 A. Sure.

20 Q. We've never received one text message
21 between you and Sheriff Sharp in this deposition
22 -- in this litigation, not one. So can you
23 explain to me why we haven't received them?

24 A. No.

25 Q. Do you still have them?



1 A. From -- no. That would take a lot of
2 memory on my phone.

3 Q. Well, we asked for the request back in?

4 MR. SEACORD: '15 or '16.

5 BY MR. HARRIS:

6 Q. '15 or '16. Did you destroy the text?

7 A. As in delete them?

8 Q. Yes.

9 A. I clear out my cache on my phone all the
10 time.

11 Q. Did you delete your text from Sheriff
12 Sharp between you and Sheriff Sharp?

13 A. Yes, I've deleted texts.

14 Q. Were you under the understanding that you
15 were to maintain those documents and provide them
16 for us?

17 A. No.

18 Q. How often do you think you text Sheriff
19 Sharp?

20 A. Past tense or present?

21 Q. Let's start in 2013.

22 A. I -- I don't know.

23 Q. Daily?

24 A. Sometimes.

25 Q. Okay. It wouldn't be too much of a



1 stretch to say that from 2013 to 2016 you
2 regularly text and regularly received texts from
3 Sheriff Sharp, isn't that accurate?

4 A. That would be accurate.

5 Q. And you still text Sheriff Sharp, don't
6 you, ma'am?

7 A. No.

8 Q. When is the last time you text Sheriff
9 Sharp or received a text from Sheriff Sharp?

10 A. I can't give you an exact date. A week
11 or two ago.

12 Q. Okay. And what did the two of you text
13 about?

14 A. I -- I don't know I would have to think.
15 He sent a lot of texts that I did not respond to.

16 Q. Okay. And what were the nature of the
17 texts. Were they about this case?

18 A. Some of them were -- if I would have been
19 -- I'm not quoting anything. If I would have
20 dropped all of this a long ago we could be fine.
21 He misses me. He misses the old me. Things of
22 that nature.

23 Q. And you didn't respond to any of those
24 texts, ma'am?

25 A. A lot of them I did not.



1 Q. My question is, you did not respond to
2 any of those texts, ma'am?

3 A. I did send some response, yes.
4 Responses, yes.

5 MR. HARRIS: We would ask that we receive
6 all of those texts.

7 MR. PORTO: Yep.

8 BY MR. HARRIS:

9 Q. Do you recall getting what's called
10 requests for production from my law firm?

11 A. Yes.

12 Q. Did you read them?

13 A. Yes.

14 Q. And if you read them you would know we've
15 been asking for texts since 2015, all texts
16 between you and Mike Sharp. Do you remember
17 reading that?

18 A. I believe I read -- I couldn't tell you
19 exactly what I read. My interpretation was all
20 texts pertaining to the case, yes. To my -- yes.

21 Q. Well, even if it was all texts pertaining
22 to this case you would agree with me then that you
23 haven't produced those since you just told me last
24 week you talked to him, talk meaning text about
25 this case, correct?



1 A. Correct.

2 (THEREUPON, Lynde Deposition Exhibit
3 No. 42 was marked for identification.)

4 BY MR. HARRIS:

5 Q. I'm going to give you what's going to be
6 marked as Deposition Exhibit No. 42.

7 MR. PORTO: Thank you.

8 MR. HARRIS: I don't have an extra one.

9 MR. PORTO: Here you can have mine.

10 MS. LAWRENCE: I've got extras.

11 MR. HARRIS: How many do we have. Did I
12 say 42?

13 MR. PORTO: You said 42.

14 BY MR. HARRIS:

15 Q. I would like to turn your attention to
16 request for production No. 17 which will be on
17 page 7. It says all communications including but
18 not limited to text messages or e-mails received
19 and/or sent by you or from any current or former
20 employee of defendant including but not limited to
21 current Jackson County Sheriff Mike Sharp from
22 September 1st, 2013, through the present that
23 refers to reflect, support, disproves, discusses
24 or otherwise concerns any of the allegations or
25 claims in your petition or EEOC, slash, MCHR



1 A. Yes.

2 Q. And you testified to that just now and
3 you testified to it the last time we were in a
4 deposition. I'm going to put in front of you
5 Deposition Exhibit No. 61 and represent to you
6 that this is your Charge of Discrimination.

7 MR. PORTO: Thank you.

8 BY MR. HARRIS:

9 Q. Is that your signature there?

10 A. Yes.

11 Q. Twice?

12 A. Yes, it is.

13 Q. In this document it says in December of
14 2013 I was accused of assisting in an alleged rape
15 of Miss Sloan, did I read that correctly?

16 A. Yes.

17 Q. Does this help refresh your recollection
18 that you indeed at one point in time viewed this
19 as assisting a rape and not just you alone?

20 A. Yes.

21 Q. Okay. Okay. So I'm going to ask one
22 question and then we take a quick lunch. Just to
23 be clear you meet the Sheriff, you sleep with the
24 Sheriff and his wife. You're hired as a part-
25 timer for \$10 per hour, correct?



1 A. Correct.

2 Q. And then you're hired with the promise of
3 a company car and the ability to work from home,
4 correct?

5 A. Not a promise, but contingency, yes.

6 Q. Well, we -- we saw a document in which
7 you and we've talked about that you negotiated.
8 So you certainly negotiated a car and a company
9 phone and a laptop. You accepted the job with the
10 expectation that that would occur, correct?

11 A. Correct.

12 Q. And you did that all the while that
13 you're sleeping with him, correct?

14 A. Correct.

15 Q. And his wife, correct?

16 A. Correct.

17 Q. And then you received a 70 percent raise
18 within one month of taking a part-time job,
19 correct?

20 A. I received -- you could call it a raise.
21 I received a change of pay due to change of job
22 status.

23 Q. At a tune of 70 percent, correct, ma'am?

24 A. Yes.

25 Q. And now you make -- until you were



1 terminated a few weeks ago, you made \$25 an hour,
2 correct?

3 A. Yes.

4 Q. So you went from \$10 an hour, to \$25 an
5 hour in less than three-and-a-half years?

6 A. Yes.

7 Q. And each of those raises and promotions
8 and increases in salary were the direct -- were in
9 the purview and were directly attributable to
10 Michael Sharp, isn't that correct?

11 A. Yes.

12 Q. Okay.

13 MR. HARRIS: That's it for now.

14 THE VIDEOGRAPHER: Going off the record
15 at 12:02 p.m.

16 (THEREUPON, a recess was taken.)

17 THE VIDEOGRAPHER: Going on the record at
18 12:37.

19 BY MR. HARRIS:

20 Q. You realize that you're still under oath,
21 correct?

22 A. Yes.

23 Q. When we left we had looked at the Charge
24 of Discrimination. I want to go back a couple of
25 exhibits, Exhibit No. 59 and go back to talk to



CERTIFICATE

OF

REPORTER

STATE OF MISSOURI

I, Cameron L. Preheim, a Certified Shorthand Reporter, Commissioned as such by the Supreme Court of the State of Missouri, and authorized to take depositions, certify that the foregoing was reported by stenographic means, which matter was held on the date, and the time and place set out on the title page hereof and that the foregoing constitutes a true and accurate transcript of the same.

I further certify that I am not related to any of the parties, nor am I an employee of or related to any of the attorneys representing the parties, and I have no financial interest in the outcome of this matter.

Given under my hand and seal this 6th day of April, 2018.

Cameron L. Preheim

Cameron L. Preheim

C.C.R. No. 1059

