

4/4/2018

MICHAEL C. SHARP

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IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

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AT KANSAS CITY, MISSOURI

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CHRISTINE LYNN LYNDE,

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Plaintiff,

8 .

9

vs.

Case No. 1516-CV25920

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Division 14

11

JACKSON COUNTY, MISSOURI,

12

Defendant.

13 .

14 .

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VIDEOTAPED

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DEPOSITION OF

17

MICHAEL C. SHARP,

18

taken on behalf of the Plaintiff, pursuant to

19

Notice to Take Deposition, beginning at 9:17 a.m.

20

on 4th day of April, 2018, at The Popham Law Firm,

21

712 Broadway, Suite 100, in the City of Kansas

22

City, County of Jackson, and State of Missouri,

23

before Sandra S. Biggs, RPR, Kansas CCR No. 0716,

24

Missouri CCR No. 970.

25 .



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1 THE VIDEOGRAPHER: Good morning. My name
 2 is Kristine Bateman, the videographer. The court
 3 reporter is Sandy Biggs. We are with Appino &
 4 Biggs Reporting Service. Today is the 4th day of
 5 April, 2018, and the time is approximately 9:17
 6 a.m. We are at the Popham Law Firm to take the
 7 deposition of Sheriff Mike Sharp in the matter of
 8 Christine Lynn Lynde vs. Jackson County, Case No.
 9 1516-CV25920. Would counsel please state your
 10 appearances for the record.

11 MR. BRAUD: Bert Braud of the Popham Law
 12 Firm on behalf of plaintiff.

13 MR. MCINERNEY: Pat McInerney on behalf
 14 of Sheriff Sharp.

15 MR. HARRIS: Charlie J. Harris, Jr., on
 16 behalf of Jackson County.

17 MICHAEL C. SHARP,
 18 called as a witness on behalf of the Plaintiff,
 19 was sworn and testified as follows:

20 DIRECT-EXAMINATION

21 BY MR. BRAUD:

22 Q. Would you please state your full name?

23 A. Michael C. Sharp.

24 Q. What's your current resident address, Mr.
 25 Sharp?



1 only in e-mails but on telephone and by text as
2 well, didn't you, sir?

3 A. Yes.

4 Q. And you, in fact, gave her a down payment
5 for the house, didn't you?

6 A. Yes.

7 Q. Miss Lynde testified that it was \$8,000.
8 Do you have any reason to doubt her recollection
9 of that?

10 A. No.

11 Q. And isn't it true that since 2013, you
12 have put -- you've either put money in an account
13 to help pay her bills or otherwise supplemented
14 her income, correct?

15 A. Yes.

16 Q. Regarding your relationship with Miss
17 Lynde, tell me if I'm wrong about this. The two
18 of you have gone on a cruise together. Is that
19 true or not true?

20 A. Yes.

21 Q. Where did you go to the cruise at?

22 A. Mexico.

23 Q. Did you go on more than one cruise?

24 A. No.

25 Q. You traveled to Branson --



1 A. Yes.

2 Q. -- Missouri, and you've done that more
3 than once, haven't you?

4 A. I believe so.

5 Q. How many times do you estimate you've
6 gone to Branson with Miss Lynde?

7 A. Two or three.

8 Q. You traveled to the Lake of the Ozarks
9 with Miss Lynde?

10 A. Yes.

11 Q. How many times do you estimate you've
12 traveled to the Lake of the Ozarks with Miss
13 Lynde?

14 A. Two or three.

15 Q. We also know that you stayed with her in
16 New Orleans in September of 2017, correct?

17 A. Yes.

18 Q. And that was after you'd already bought
19 the house together, correct?

20 A. Yes.

21 Q. You also traveled to her -- with her in
22 Washington, D.C., in 2014, correct, February 26,
23 2014, if my recollection is correct?

24 A. Yes, yes.

25 Q. Now, those are just some the trips that



1 you took. What I'd like for you to do is just
2 spend a moment more, think about other trips that
3 you two have taken between 2013 and the date of
4 this deposition?

5 A. Gone to Phoenix.

6 Q. When did you go to Phoenix?

7 A. Gosh, I can't remember. Back a couple
8 years ago.

9 Q. Was this in connection with any Jackson
10 County business or any business connected with her
11 at HIDTA?

12 A. She was out at HIDTA on training. I flew
13 out.

14 Q. And I think that Mr. Braud gave us a
15 document recently that had Phoenix travel on it.

16 A. Okay.

17 Q. Training. Was that when --

18 A. I don't recall the date.

19 Q. The same time or was it a different time?

20 A. I don't recall if it was the same one.

21 Q. Okay. And you paid for your own ticket
22 to go out there?

23 A. Yes.

24 Q. Now, before we go any further on Phoenix,
25 these other trips that you took, Miss Lynde



1 indicated to me that the trips that you took you
2 paid for her plane ticket to go out to -- when you
3 traveled by flight. Is that accurate?

4 A. Yes.

5 Q. And you paid for the hotels, correct?

6 A. Yes.

7 Q. And the meals?

8 A. Yes.

9 Q. And the other I call them extras that go
10 with it, whether it would be, I don't know,
11 trinkets, sightseeing sort of things?

12 A. Yes, sir.

13 Q. Correct?

14 A. Yes, sir.

15 Q. All the time that she was suing, whether
16 that be by a charge of discrimination or filing a
17 lawsuit or an amended lawsuit, all the time that
18 was going on, you two were traveling together,
19 correct?

20 A. Yes, sir.

21 Q. Now, I want to move to, like I told you,
22 some questions that I think are going to be pretty
23 much yes or no. If you want to pontificate on
24 them or talk longer, I'm not going to -- I'm not
25 going to stop you from doing that. We talked a



1 little bit about you being the appointing
2 authority, and Mr. Braud asked you some questions.
3 His were a little more narrowly focused than -- or
4 broader than I'm going to ask. The fact of the
5 matter is you're the final decision maker as it
6 comes to hiring, firing, demotion, promotion and
7 disciplinary decisions, correct?

8 A. Yes.

9 Q. And you're, in essence, the CEO of the
10 sheriff's department, correct?

11 A. Yes.

12 Q. And so everybody that's at the sheriff's
13 department is subordinate to you, correct?

14 A. Yes.

15 Q. In essence, you're everyone's supervisor,
16 correct?

17 A. Yes.

18 Q. We talked a little bit about Melody
19 Sloan, and you could not recall when the two of
20 you met. It's my understanding that you met
21 Melody Sloan in a bowling tournament through a
22 mutual friend in February of 2013. Does that help
23 refresh your recollection?

24 A. That's possible, yes.

25 Q. You don't have any reason to doubt my



1 Q. And on that very first night that Miss
2 Lynde and Cindi met was the first time that the
3 three of you engaged in a three-way sexual
4 encounter, correct?

5 A. That is correct.

6 Q. And that went on for months, that meaning
7 the three-way sexual encounter between you, your
8 wife and Miss Lynde?

9 A. Yes. The relationship went on for
10 months, not so much the sex.

11 Q. And when you say the relationship went
12 on, the relationship between Miss Lynde and your
13 wife -- former wife or you and your former wife,
14 who?

15 A. All three of us it was.

16 Q. Now, you're not suggesting to me that sex
17 stopped. You're just saying that it was a
18 relationship and sometimes there was sex,
19 sometimes there wasn't?

20 A. Correct.

21 Q. But the sexual and romantic relationship
22 between you and Miss Lynde, it's fair to say that
23 it began in 2013 and continued through 2018,
24 correct?

25 A. Correct.



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CERTIFICATE

OF

REPORTER

STATE OF MISSOURI

I, Sandra S. Biggs, 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 9th day of April, 2018.

Sandra S. Biggs

Sandra S. Biggs

C.C.R. No. 970

