

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

AMANDA TIMPSON,)	
)	
Plaintiff,)	
)	CIVIL ACTION
)	FILE NO. 2022CV369492
vs.)	
)	
FULTON COUNTY DISTRICT)	
ATTORNEY OFFICE, ET AL.)	
)	
Defendants)	

**PLAINTIFF’S STATEMENT OF MATERIAL FACTS AS TO WHICH THERE EXISTS NO
GENUINE ISSUE IN DISPUTE**

**A. Ms. Timpson's initial employment with the office of the Fulton County
District Attorney (FCDA).**

1. Ms. Timpson began working for FCDA in 2018 under Paul L. Howard Jr. (PH) as the Director of Gang Prevention and Intervention. (Ex. 1.)
2. While under the PH administration, Ms. Timpson performed the following tasks:
 - a. Co-authored the 2020 Office of Juvenile Justice and Delinquency Prevention (OJJDP) gang prevention grant. (Ex. 2.)
 - b. Work on a capital campaign for the establishment of Fulton County’s first Gang Prevention Youth Empowerment Center, located at 475 Fairburn Rd. in Southwest Atlanta. (Ex. 3; Moore Dep.10:7-25; 11:1-12.)
 - c. Worked as an academic partner with Professor Timothy Dowd of Emory University. (Ex. 4; Moore Dep. 11:25; 12:1-5.)
 - d. Created program initiatives to implement within the Fulton County Gang Prevention Youth Empowerment Center. Id.

e. Created a community-led steering committee to divert gang-involved youth. Id.

B. Fani Willis becomes the Fulton County DA and hires Ms. Timpson through an extensive interview process.

3. On November 4, 2020, Fani Willis sent an email to all current DA staff, requiring each employee to apply for a position in her administration based on the organizational chart she provided. (Ex. 5.)
4. Ms. Timpson did so and was interviewed on November 20, 2020, in front of a nine-member interview panel, which included Fani Willis (Willis Dep. 24:2-25; 25:1-5.)
5. On December 9, 2020, Ms. Timpson was provided with an offer letter for the role of Juvenile Diversion Program Manager; the title was almost immediately reclassified to Program Director. (See Ex. 6.)
6. On December 11, 2020, Ms. Willis announced her Executive Leadership Team to the entire DA office via an office-wide mailer titled “Integrity Transition Hiring Announcements.” Ms. Timpson’s name was listed third down on the left-hand side. “Please join us in congratulating the following Executive Staff on being selected for the 2021-2024 Administration.” Amanda Timpson is listed as Program Manager for Juvenile Diversion on this document. (Ex. 7.)
7. On December 14, 2020, Ms. Willis requested a bio from Ms. Timpson, stating the following to Ms. Timpson: “Our Transition Team has interviewed over 400 applicants to join the Fulton County District Attorney 2021 Administration. Those interviews are ongoing—many decisions have not yet been determined, including final titles, salaries, and positions. However, I write to inform you—regardless of those pending decisions—you have been selected to join the 2021 Administration's Executive Leadership Team.” (See Ex.8.)
8. Ms. Timpson’s title was reclassified shortly thereafter to Director of Juvenile Diversion. (See Ex. 9.)

C. **Ms. Timpson’s job duties as Director of Juvenile Diversion.**

9. As Director of Juvenile Diversion, Ms. Timpson managed the 2020 OJJDP Grant, as evidenced by her being acknowledged on the grant itself as the “project director,” stating, “*Project Director*—Amanda Timpson will serve as the (AGAPE) Initiative project director, and her primary responsibilities will focus on goal implementation and staff oversight. She will provide leadership for the GIC, AGAPE Network, and the community assessment process. Additionally, she will lead weekly team meetings and monitor implementation and performance measures. Ms. Timpson is currently the Director of Gang Prevention and Intervention at FCDA. She holds a double bachelor’s degree in Sociology and African Studies, as well as a master’s and specialist degree in Human Behavior and Adolescent Advocacy. Additionally, she has earned certifications in Crisis Prevention Intervention, Non-Physical De-escalation Skills, and CPR from the American Heart Association. Her formal education and training are complemented by more than 10 years of experience in case management, advocacy, education, and behavioral interventions for programming with children, adolescents, young adults, and families. One of the most significant experiences Ms. Timpson brings to the AGAPE Initiative is her three years of direct gang prevention experience. As Lead Case Manager, she cultivated rapport with 100+ gang members in South Los Angeles to decrease crime and gang recruitment.”

(See Ex. 10.)

10. As the project director of the OJJDP Gang Prevention Grant, Ms. Timpson received multiple letters of recommendation for her exemplary work as the project manager of the OJJDP Gang Prevention Grant. (See Ex. 11.)
11. Ms. Timpson collaborated with Ian Elmore-Moore and Michelle Henry to develop programs, create a budget, and author and implement the logical functions of the OJJDP Gang and

Prevention Grant. (See Ex. 12; Moore Dep 12:1-25; 13:1-25; 13:1-25; 14:1-25. 15:1-25; 16:1-7; 36: 9-23 Timpson Dep. 44:6-25; 45:1-25; 46:1-7.)

12. Ms. Timpson collaborated with multiple community stakeholders during the implementation of the OJJDP Gang and Prevention Grant. (See Ex 13; Moore Dep.11:7-24)
13. Michelle Henry complimented Ms. Timpson's work to another colleague and endorsed her contributions to the award of the grant, stating, "You said her leadership was a critical component in securing the 2020 OJJDP Comprehensive Anti-Gang Program and grant for more than \$400,000 for the office of the Fulton County District Attorney. You said that. Yes. This was what was written in here, and that's what Michelle, who worked with her at the time, said that she contributed." (See Ex. 14.)
14. Ms. Timpson located, vetted, and was the point of contact for all sub-awardees of the OJJDP Grant. (See Ex. 15.)

D. Ms. Timpson began to have issues with her direct supervisor, Michael Cuffee.

15. In early March 2021, Ms. Timpson told Mr. Cuffee that the grant itself prohibited his contemplated use of grant money. (Ex. 16; Timpson Dep. 39:7-24; 40:1.)
16. Ms. Timpson also began discussing her concerns about Mr. Cuffee's potential misuse of grant money with her colleagues from March 2021 through May 2021. (See Ex. 17.)
17. On May 3, 2021, Ms. Timpson voiced frustration with Mr. Cuffee directly to him via an email dated May 3, 2021 (see Ex. 18.); Ms. Timpson believed the stifling of her work was the first actionable retaliatory action by Mr. Cuffee between March and May. (See Ex. 19.)
18. On the same day, Ms. Timpson reached out to DA Willis, requesting a meeting to discuss her concerns about suspected misuse. (Ex. 20.)
19. Just days after Ms. Timpson reached out to Ms. Willis to seek refuge from the retaliatory actions and address her concerns, Mr. Cuffee confronted Ms. Timpson, telling her that DA Willis had reached out to him and that anything she said to DA Willis would be relayed back

to him. This made Ms. Timpson feel as if she had nowhere to go to address potentially unlawful concerns. (Ex. 21 audio.)

E. Junior DA program planning starts.

20. In May 2021, Ms. Timpson was assigned the task of planning Junior DA, a long-standing crime prevention summer program for at-risk youth in Fulton County. (Ex. 22.)

21. Junior DA is designed to provide exposure to at-risk youth who reside in Fulton County, GA, and may seek to pursue a career in the legal profession, thereby bridging the gap between law enforcement and communities in need. (Ex. 23; Willis Dep.16:3-13, Zellner 52:19-25; 53:1-17.)

22. Throughout the initial planning stages, Ms. Timpson again flagged discussions with Mr. Cuffee that contemplated a misuse of funds. (Timpson Dep. 39:7-25; 40:1.)

23. Mr. Cuffee discussed purchasing an iMac computer and other office credentials, which were prohibited. (Timpson Dep. 39:7-25; 40:1; Ex. 16.)

24. The concerns about misuse of funds were not just Ms. Timpson's alone, as other members of the program's team shared fears of wrongdoing. For fear of experiencing retaliation themselves, they sent proof to Ms. Timpson via email. (Ex: 24, K. Lungsford email with Budget.) Due to Ms. Timpson's attempt to hold Mr. Cuffee accountable, Mr. Cuffee removed her from the planning of Junior DA in the early part of June 2021.

F. Ms. Timpson's exemplary work leads to an invitation to the SB440 meeting.

25. On June 7, 2021, Ms. Timpson was invited to the SB440 meeting scheduled for the following day by Jawara Mars, Executive DA Daysha Young, and DA Willis to present youth-based initiatives that provided collaboration between multiple initiatives and departments within the DA's office. (Ex. 25; Mars Dep. 12:3-25; 13-125.)

26. On June 8, 2021, Ms. Timpson attended the SB440 meeting. She facilitated a presentation for eight people, including Chief Deputy ADA Jawara Mars, Executive DA Daysha Young, DA

Fani Willis, Assistant Chief Investigator Jhonna Griffin, LCSW Kelly Greenberg, and others. Ms. Willis and her team were so impressed with Ms. Timpson's work that Ms. Willis adopted several of her initiatives and gave Ms. Timpson a few deliverables to work on in her director's role, in addition to deliverables to assist with the SB440 unit. (Ex. 26; Mars Dep. 14:1-25; 15:1-5, **Compare** Ex. 26, **with** Mars, Dep. 16:1-25; 17:1-25; 18:1-25; 19:1-25.)

27. At the June 8, 2021 SB440 meeting, Ms. Timpson facilitated her presentation. She was assigned to contact Dr. Marice Granger, head of student discipline for Atlanta Public Schools, and Justin "Meezy" Williams, who was the manager of music artist *21 Savage*, to advance their collaboration on the Fulton County Youth Empowerment and gang prevention center. (Ex. 27.) (**Compare** Mars Dep. 14:16-25; 15:1-5, **with** Willis 25:16-25 and 26:1-3 regarding the Fulton County Youth Empowerment and Gang Prevention Center that was supposed to be erected in South Fulton at 475 Fairburn Road).

28. Ms. Timpson followed up with each deliverable given by DA Willis in the June 8, 2021, meeting, as DA Willis and her team were actively planning to build the Gang Prevention Center. Ms. Timpson worked on programming (see Ex. 28.)

G. Ms. Timpson continued to tell Mr. Cuffee that his proposed spending was unlawful and was placed on a Professional Development Plan (PDP) without warning.

29. Following the SB440 meeting, Ms. Timpson reached out to Mr. Cuffee to update him on the meeting and the subsequent deliverables. After being made aware of Ms. Timpson's attendance at the meeting, Mr. Cuffee accused Ms. Timpson of breaching the chain of command despite being previously invited to the meeting by then-chief deputy ADA of the SB440 unit, Jawara Mars (Ex. 29; Mars Dep. 25:13-25; 26:1-25; 27:1-5; Timpson Dep. 148:4-25; 149:1-25; 150:1-25; 151:1-8; 152:1-25; 153:1-5.)

30. Following the SB440 meeting, Ms. Timpson continued to inform Mr. Cuffee that his proposed spending plans violated the grant requirements. (See Ex. 30; A. Timpson Declaration.)

31. Just two weeks after the SB440 meeting, Ms. Timpson was placed on a PDP by Mr. Cuffee, in part citing a breach of chain of command. (Timpson Dep.230:20-25; 231:1-20.)
32. The PDP was a personal attack on Ms. Timpson and a transparent form of retaliation following her receipt of praise for her work. (See Ex. 31.)
33. Mr. Cuffee's direct reports, Dexter Bond and HR Director Kyra Banks, did not know about the PDP; in fact, Mr. Bond stated that the electronic signature was not his and sent text responses on July 21, 2021, that included, "Wow"; "Make me a physical copy"; and "This is a problem." Mr. Bond also told Ms. Timpson she was moved "in an effort to protect [her]." Mr. Bond never mentioned performance as an issue. (Ex. 32.)
34. Eventually, the PDP was voided, and it never made it to Ms. Timpson's employment file due to its fraudulent nature. (Timpson Dep. 163:1-25; 164:1-25.)

H. Ms. Timpson tells Mr. Cuffee about the Junior DA's misuse of funds.

35. Mr. Cuffee moved Ms. Timpson to the planning committee of Junior DA in May of 2021. The actual 2021 Junior DA Program started at the beginning of July. (See Ex. 33.)
36. The 2021 Junior DA Program application restricted participants to Fulton County school attendees, explicitly stating: "school attending (**Must** be in Fulton County)." (Ex. 23; Timpson Dep. 108:1-25; 109:1-17, Moore Dep. 22:11-23; 23:9-22.)
37. The flyer titled "Junior DA, District Attorney Summer Youth Program" for 2021 states, "The youth program accepts 6th- 9th graders from **Atlanta and Fulton County Public Schools.**" (See Ex. 34)
38. The District Attorney's website regarding the 2021 Junior DA Program participants also states that the "youth program accepts 6th-9th graders from **Atlanta and Fulton County Public Schools**" (See Ex. 35.)
39. On the first day of Junior DA programming, the team facilitated an "ice breaker" with the participants, who introduced themselves and stated where they live and attend school. Ms.

Timpson became concerned when multiple participants shared that they were not Fulton County residents; some were not even residents of the state of Georgia or the southeastern region of the United States. (Ex. 36; Timpson Dep. 103:1-25; 104:1-25; 105:1-24; 106:1-25; 107:1-25; 108:1-25; 109:1-17; 231:1-25; 232:1-9)

40. Natalie Zellner, Chief Deputy of Grants, which includes the Junior DA Program for 2021, stated the following in relation to the type of children the Junior DA Program is designed to assist: “At some point. And I will add this: I readily communicate with the Department of Justice, and we discuss how children have no control over their five living circumstances, their environments, and how there is a lot of movement, especially among the **unhoused**. **And if a child applies and needs this, we ensure that the goal of the DOJ grant is to provide services and connections to at-risk youth**. They may not, again, be able to control their housing situation. For instance, if they start in one school and transfer to a different school, or if they start a school and get suspended, they may also be required to transfer to a different school.” (N. Zellner Dep. 53:2-17.)
41. Ms. Timpson recognized that one of the child participants was an out-of-state resident of Wisconsin, which means that the participant did not attend an Atlanta or Fulton County School; notably, this participant is the niece of Executive DA Daysha Young, according to testimony from this youth’s mother (Juleigh Martindale Dep. 4:11-25; 6:5-17; 8:1-17, 15:9-17.)
42. Another out-of-state participant was a resident of Florida, and this participant was DA Willis’s niece, according to testimony. (Willis Dep. 100:17-25; 101:1-25; 102:1-11
Contradicting statements regarding DA Willis’s niece, Marleigh Johnson. See Pollard Dep. 39:3-20)
43. Additionally, several participants attended private schools, including Woodward and Pace Academy, both well-known institutions with a tuition cost of \$40,000 per year—which are not

the type of at-risk youth described by Natalie Zellner, since the focus of the Junior DA Program is crime prevention. (See Ex. 37; Timpson Dep. 231:21-25; 232:1-9.)

44. Beginning in the second week of July, Ms. Timpson voiced her concerns to Mr. Cuffee and Junior DA colleagues (See Ex. 38, Donald Moore letter.)

45. In September of 2024, three years after Ms. Timpson initially blew the whistle on the misuse of Junior DA funds, Michelle Henry, Director of Grants for the Fulton County District Attorney's Office, sent a flurry of emails to the awardee of the Junior DA program ahead of her deposition, seeking direction on the legality of out-of-state youth participating in the 2021 Junior DA program. (Ex. 39.)

I. Ms. Timpson filed a grievance about the PDP and retaliation for reporting the perceived misuse of funds by Mr. Cuffee.

46. On July 7, 2021, Ms. Timpson reached out to Kyra Banks, the Head of Personnel for the FCDAO, to request a meeting about Mr. Cuffee. (See Ex: 40, email to meet with Kyra Banks.)

47. At the July 20, 2021, meeting, Ms. Timpson spoke with Ms. Banks about the PDP and the months of retaliation she endured. She reported the actual misuse of Junior DA Grant Funds by prohibited participants in the Junior DA program and suspected misuse of OJJDP grant funds. (See Ex. 41)

48. Ms. Banks said she would escalate the matter to Chief Deputy of Operations Dexter Bond and compiled the handwritten notes she took and sent them to Ms. Timpson via email (see Ex. 42, email asking for notes.)

49. On July 26, 2021, Ms. Timpson ran into Dexter Bond in the hallway; Mr. Bond said he had been meaning to reach out to Ms. Timpson and the two had an impromptu meeting in front of Mr. Bond's office regarding Ms. Timpson's concerns about the Junior DA Program having participants that violated the demographic requirements, the OJJDP misuse of funds issues, perceived retaliation, and more. (See Ex. 43.)

J. Ms. Timpson tells Dexter Bond that she has legal claims against the Department, and DA Willis demoted Ms. Timpson that same day.

50. After talking in person with Dexter Bond on July 26, 2021, Ms. Timpson went on to tell Mr. Bond in a text message, “As it stands now, due to his actions, I have multiple lawsuits. Equal Employment Opportunity Commission (EEOC) violations, wrongful termination attempts, and other issues have left him out of pocket. I’m sure if [DA Willis] knew, she wouldn’t be okay with this.” (Ex. 44; Ex. 79, Declaration of Amanda Timpson.)
51. 13 minutes later, Mr. Bond responded, “You are meeting with the DA today at 3 PM.” (See Ex. 44.)
52. Ms. Timpson went into the meeting with Dexter Bond and Fani Willis at 3 p.m. on July 26, 2021. Upon entering the meeting and beginning to disclose the suspected misuse of federal grant funds to DA Willis, Ms. Timpson was immediately cut off and told she would no longer be the Director of Juvenile Diversion and that she was now going to be a “File Clerk.” Her new supervisor was legal assistant Valencia Younger. (Ex. 45; Willis Dep. 44:21-25; 45:1-25; 46:1-25; 47:1-25; 48:1-25; 49:1-3, Timpson Dep. 172.13-25; 173:1-22)
53. July 26, 2021 was the first time Ms. Timpson was told that DA Willis was unhappy with her work. In an email from Ms. Timpson asking clarifying questions regarding the logistics of her demotion, Ms. Timpson attempted to put DA Willis's misconceptions to rest. As it became clear to Ms. Timpson, this was what Mr. Bond had meant when he warned her that she was being set up to be the “fall guy” the day after her demotion. (Timpson Dep. 168:13-25; 169:1-19.)
54. In fact, the only time Ms. Timpson was ever told directly by DA Willis that there was a problem with her work was on July 26, 2021, after sending a text about the lawsuit against the Department, and within two days of a former lawyer sending a demand letter on November 16, 2021, discussing misuse of funds for participants that lived outside of Georgia regarding

the Junior DA Program, and misuse of fund regarding the OOJP Grant regarding purchasing equipment when grant documentation said no/zero equipment., inter alia. (Ex. 46; Ex. 80, p. 1, stating no/zero for five different categories and even say no/zero supplies; Willis Dep. 159:13-22; 161:1-7; 163:1-25.) DA Willis read the demand letter sent on November 16, 2021. (Willis Dep. 50:7-51:10; 172:13-23.)

55. On July 27, 2021, Dexter Bond approached Amanda and her fiancé, Dashawn, in the neighborhood gym they shared to discuss the events of the previous day. (See Ex. 47, Gym attendance records; Timpson Dep. 168:13-25; 169:1-25; 170:1-6; 171:1-6.)
56. During said conversation at the gym, which lasted over 45 minutes, Mr. Bond told Ms. Timpson that he did not trust Michael Cuffee or his relationship with DA Willis. He stated that he had vouched for Ms. Timpson's work ethic to Ms. Willis on multiple occasions, and warned Ms. Timpson to be careful because he believed that Ms. Timpson was being used as a "fall guy." Dexter advised Ms. Timpson to seek additional support from Fulton County Human Resources because she would not receive the help she needed regarding this manner in the Fulton County District Attorney's Office FCDAO (Ex. 48; Bond Dep. 48:21-25; 49:1-25; 50:1-25; 51:1-25; 52:1-25 53:1-25; 54:1-20; Timpson Dep. 168:13-25; 169:1-25; 170:1-6; 171:1-6.)
57. Prior to Mr. Bond's advice to seek refuge within the Fulton County human resources, Amanda had done so on the morning of July 27, less than 24 hours after her demotion. Her initial points of contact were Ms. Lawanda Neely and Ms. Justina Gordon. After several meetings and disclosures to Ms. Neely and Ms. Gordon, Ms. Timpson's situation escalated. (Timpson Dep. 257:1-25; 258:1-25; 259:1-25; 260:1-20.)

K. Ms. Timpson's job duties change.

58. As the Director of Juvenile Diversion, Amanda Timpson had her own office. As the file clerk, also known as the Liaison for the Records Division, she was stripped of her office, removed

from the website, and disinvited from leadership meetings. (Timpson Dep. 193:18-25; 194:1-25; 195:1-3; 197:24-25; 198:1-25; 199:1-6.)

59. As Director of Juvenile Diversion, Ms. Timpson was a part of DA Willis's executive leadership team, and Ms. Timpson's job duties were, inter alia, to create and implement juvenile diversion programs for the office and manage OJJDP grants—both of which entailed constant communication with stakeholders and executive-level meetings. (Ex. 49.)
60. As the file clerk, or Liaison for the Records Division, Ms. Timpson could no longer work remotely as she did in her Director role. Ms. Timpson now had to report to the office daily despite her request for a reasonable accommodation due to being at severely high risk for COVID complications as a result of a lifelong illness that had been a part of her employment file at the DA's Office since she began working under the Paul Howard administration. (Ex. 50, Moore Dep. 52:2-11.)
61. As the file clerk (Liaison for the Records Division), Ms. Timpson was now supervised by legal assistant Valencia Younger. She sat in a cubicle in the records division, where she performed rudimentary manual labor and file clerk tasks such as sifting through tens of thousands of documents to organize them alphabetically, making spreadsheets, retrieving the mail every day, taking orders to judge's chambers, and labeling hundreds of envelopes for mailing to program participants. (See Ex. 51; Willis Dep. 45:21-25; 46:1-4; 155:25; 156:1-25; 157:1-2; Younger Dep. 29:18-25; 30:1-25; 31:1-13, 16-25; 36:14-25; 37:1-25; 38:1-25; 39:1-8; 40:1-25; 41:1-25; 42:1-25; 43:1-25; 44:1-25; 45:1-25; 46:1-25; 47:1-25; 48:1-25; 49: 1-11; Timpson Dep. 197:24-25; 198:1-25; 199:1-6; 373:14-25; 374:1-25; 375:1-25; 376:1-25; 377:1-5.)
62. Ms. Timpson eventually had three supervisors in this role: Valencia Younger, Epiphany Henry, and Ramona Toole. (See Ex.52.)

63. In an office-wide email sent out on September 9, 2021 announcing personnel changes came praise from DA Willis, the same type of praise Ms. Timpson's work received in August when Ms. Timpson was nominated to be highlighted via the office-wide newsletter, chosen over hundreds of employees at the DA's office. (See Ex. 53; **Compare** the praise of Ms. Timpson's work, **with** Willis Dep. 42:2-14; 51:3-10; 58:4-8; 67:13-19.)

L. Documented performance record.

64. Prior to her termination, Ms. Timpson had no negative performance evaluations or disciplinary actions in her employment file. (See Ex. 54.)

65. Ms. Timpson has over 30 total letters of recommendation and performance evaluations gathered for this lawsuit (See Ex. 55.)

66. Amongst Ms. Timpson's recommendations and evaluations is a recommendation by Natalie Zellner, who tried to backtrack her statements at her deposition while represented by the same counsel who represents the Defendant in this case [inherent conflict]. (See Ex. 56; N. Zellner Dep. 17:7-27:1; Timpson Dep. 142:17-25; 143:1; 154:7-12.)

M. Disclosure of reasonably believed corruption and timing of disciplinary action.

67. The notes by Human Resource Representative Michelle Braxton for Fulton County from the interview between Ms. Timpson and Michelle Braxton, which took place on September 22, 2021, also demonstrate that Ms. Timpson disclosed her belief in the misuse of funds regarding the Junior DA Program and OJJDP grant to Fulton County Human Resources. (See Ex. 57.)

68. On November 16, 2024, Ms. Timpson's former attorney Gregory Fidlon sent a demand letter, which detailed her allegations concerning misuse of Junior DA Funds, including the fact Junior DA Program Participants were from out of state when the application and other materials required program participants to be attending Fulton court or Atlanta public schools. Ms. Willis read the demand letter, as demonstrated by evidence. (See Ex. 58;

Willis Dep. 50:1-25; 51:1-22)

69. In addition to the express language on the Junior DA Program application and other public materials, Ms. Timpson's belief that 2021 program participants were required to attend Fulton County or Atlanta public schools is further supported by the fact that at least one of DA Willis's employees falsified the Junior DA Application (which is a government document) to make it seem as if a program participant attended a Fulton County or Atlanta Public school, when in actuality this program participant was a resident of a different state (Wisconsin), where said participant attended a Wisconsin school. (See Ex. 59; Martindale Dep. 6:18-25; 7:1-4; 8:1-17)
70. On January 14, 2022, Ms. Timpson met with the Office of Diversity and Civil Rights Compliance Division to discuss her complaints about misuse of funds regarding the Junior DA Program and the OJJDP Grant with Director Niger Thomas. Within 20 minutes of leaving that meeting, DA Willis terminated Ms. Timpson's contract. (See Ex. 60; Timpson Dep. 217:2-25; 218:1-2; 219:1-25; 220:1-8)
71. In a recorded conversation on November 19, 2021, Ms. Timpson yet again spoke to DA Willis about her belief that there was a misuse of funds regarding the Junior DA Program (due to outside-of-state program participants) as well as about her perceived misuse of OJJDP grant money. DA Willis **never denied these allegations** or corrected Ms. Timpson regarding the Junior DA Program allegations. (Ex. 61; Willis Dep. 112:1-25; 113:1-4, Timpson Dep. 248:2-25; 249:1-25; 250:1-25; 251:1-24)
72. The Office of Diversity and Civil Rights Compliance Division opened another investigation regarding Ms. Timpson's allegations of misuse of Junior DA and OJJDP funds on or about December 2, 2021. (See Ex. 62.)
73. Ms. Timpson, in addition to reaching out to Fulton County Human Resources and DCRC, also contacted Ms. Willis and Fulton County Attorney Dominique Martinez on December 7, 2021

to follow up on the November 16, 2021 demand letter that DA Willis and her team never responded to. (See Ex. 63.)

N. Ms. Timpson was terminated on the day she met with the Director of the Office of Diversity and Civil Rights Compliance Division (DCRC).

74. On January 14, 2022, immediately before meeting with the Office of Diversity and Civil Rights Compliance Division, Ms. Timpson met with Ramona Toole, a member of DA Willis's executive team. (See Ex. 64; Timpson Dep. 217:1-25; 218:1-25; 219:1-16.)
75. Ms. Timpson met with the Office of Diversity and Civil Rights Compliance Division following her complaint to FCDA regarding the misuse of funds related to the Junior DA Program and the OJJDP Program. (Timpson Dep. 126: 3-12.)
76. During the meeting with Ms. Toole on January 14, 2024, Ms. Timpson confided in Ms. Toole that she was going to meet that day with the Office of Diversity and Civil Rights Compliance Division. After Ms. Toole promised to hold their conversation in confidence, Ms. Timpson confided in Ms. Toole the misuse of funds she believed had been permitted regarding the Junior DA Program and other unlawful activities she believed had been allowed by the DA's Office. (Timpson Dep. 217:1-25-219:1-16.)
77. Ms. Toole testified that she believed Ms. Timpson was trying to "blackmail" the DA's office and went straight to DA Willis on January 14, 2022, after Ms. Timpson left Ms. Toole's office to meet with the Director of the Office of Diversity and Civil Rights Compliance Division. (See Ex. 65; Toole Dep. 62:15-25; 63:1-25; 64:1-25; 65:1-25; 66:1-25; 67:1-12)
78. While Ms. Timpson was meeting with the Director of the Office of Diversity and Civil Rights Compliance Division, she received a meeting invite via Outlook to meet with DA Willis on January 18, 2022. (Ex. 66.)
79. After receiving the meeting invite while talking to the Director of the Office of Diversity and Civil Rights Compliance Division, Ms. Timpson told Director Niger Thomas during the

meeting that she was afraid to meet DA Willis alone because of the months of retaliation she'd already endured. Ms. Thomas responded by saying she would send someone from Human Resources to accompany Ms. Timpson to the meeting on January 18, 2022 (Ex. 66.)

80. Within 20 minutes of leaving the January 14, 2021 meeting with the DCRC Director, Ms. Timpson was terminated. (See Ex. 67.)

81. This timeline reveals a tight temporal nexus between Ms. Timpson's unlawful firing and was of great concern to leadership within the DCRC, who assured Ms. Timpson she had engaged in protected activity and that the timing was alarming and undeniable. (Ex. 68- audio recordings.)

O. Who terminated Ms. Timpson?

82. Ramona Toole was deposed before Dexter Bond, DA Willis. (**Compare** date of Toole Dep [09/20/2024], **with** date of Bond Dep [09/24/2024], **with** date of Willis Dep.[11/14/2024])

83. Ms. Toole states that on January 14, 2021 she went to DA Willis right after meeting with Ms. Timpson (who was headed to the DCRC to discuss her complaints) and recommended that Ms. Timpson be terminated; Toole testified that DA Willis's termination of Ms. Timpson was essentially a rubber stamp of Toole's strong recommendation to terminate her. (Toole Dep. 67:12-25; 68:1-25; 69:1-8.)

84. Contrary to Ms. Toole's version of events, Dexter Bond claimed that he ordered the termination of Ms. Timpson and that Toole was too nice of a person to recommend termination: Toole, according to Mr. Bond, only wanted to move Ms. Timpson away from her department. (Bond Dep. 23:3-25; 24:1-25; 25:1-3; 28:12-25; 29:1-24; 30:12-20; 31:6-14.)

85. DA Willis, contrary to Mr. Bond and Ms. Toole's testimony, claims she was the one who decided to terminate Ms. Timpson, not Mr. Bond or Ms. Toole. (Willis Dep. 65:7-12.)

P. Post-termination story creation.

86. There was never a single disciplinary action recorded in Ms. Timpson's employment file before her termination or at any point throughout her four-year employment with FCDA. (Ex. 54 Employment file.)
87. After being terminated on the day Ms. Timpson met with the DCRC, the defendant began inquiring about Ms. Timpson's work performance, requesting memos from DA Willis's close friends and staff to support the disgruntled narrative they painted of Ms. Timpson. However, both Dexter Bond and Valencia Younger testified to the contrary, praising Ms. Timpson's work performance. Dexter Bond testified that he "**vouched for her [Ms. Timpson's] work ethic**, and that he did not get any criticisms of her work performance and that his KPI number did well because his numbers improved when Ms. Timpson was moved to record restriction. Ramona Toole had done the same in a recorded call just seven days before Ms. Timpson's termination. (Bond Dep. 51:16-52:2, 73:4-17; 74:1-25, 75:1-25; 76:1-25; 77:1-12 Younger Dep. 24:15-25; 28:10-25; 29:1-25; 30:1-25; 31:1-13; 35:15-25; 36:1-25; 37:1-25; 38:1-25; 39:1-8.)
88. Following Ms. Timpson's termination, a new narrative emerged, laced with claims of a violent, potentially unstable person whom people feared, despite having a spotless personnel file. Ramona Toole testified that Ephiany Henry felt threatened by Ms. Timpson for months before her termination, despite no specific threats ever being made, and that Ms. Henry and Ms. Timpson had a great relationship at the time. (Toole Dep. 92:4-14, compared to Timpson Dep. 221:17-25; 222:1-25; 223:1-25; 224: 1-12.)
89. According to Toole, Ms. Henry was in fear. The conversation Ms. Toole cited in her memo, unbeknownst to her, was recorded by Ms. Timpson and told a completely different story than what was testified to under oath. (Ex. 69; audio 11/19/21, Timpson Dep. 221:17-25; 222:16-25; 223:1-25; 224:1-12)

90. This stemmed from the demand sent by Ms. Timpson's former attorney Gregory Fidlon on November 16, 2021, Willis within two days then criticized Ms. Timpson's work performance. (Ex. 69; Toole; Henry Post termination Memo's; Henry and Timpson Text showing a great relationship; Toole Dep. 91:2-25; 92:1-25; 93:1-25; 94:1-25; 95:1-5 Willis Dep. 169:1-7, Timpson Dep. 220:9-25; 221:1-25; 222:1-25; 223:1-23; 224:1-12.)
91. Ms. Timpson was advised on December 22, 2021 to go home due to contact with a coworker whose child tested positive for COVID-19. Ms. Timpson is unvaccinated and has a severe pre-existing bronchial respiratory condition. (Toole Dep. 33:10-16; Timpson Dep.)
92. Ms. Toole advised Ms. Timpson to quarantine for 10 days and return with a negative COVID-19 test result. During the time Ms. Timpson was advised to stay home, she became extremely sick, and she communicated with her supervisors via texts, emails, and phone calls. Upon Ms. Timpson's return on January 12, 2022, Ms. Timpson produced multiple physician letters and received a signed and approved leave slip from Ms. Toole on that day. Ms. Timpson has produced an audio recording of a conversation between herself and Ms. Toole dated January 7, 2022, seven days before her termination. Job abandonment was never once mentioned. (See Ex. 70 audio w/ R. Toole 1/7/22; Timpson Dep. 222:3-15)
93. Ms. Younger was ill during the same period as Ms. Timpson and was allowed to work from home without using her accrued time. Her treatment was drastically different from Ms. Timpson's. Ms. Younger was not asked to produce documentation to support her claim of illness. (Ex. 71, Younger Dep. 49:16-25; 50:1-25; 51:1-8, Toole Dep. 33:1-25; 34:1-25; 35:1-25; 36:1-25; 37:1-25; 38:1-25; 39:1-25; 40:1-25; 41:1-25; 42:1-25; 86:11-25; 87:1-25; 88:1-25; 89:1-25; 90:1-6; 95:1-21)
94. To further the narrative of Ms. Timpson being an absent employee who does not produce or show up for work, it was testified that Ms. Timpson reported to the Deputy of Juvenile Brett

Pinon. At no point, either in writing or verbally, was Ms. Timpson ever assigned to work with or under Deputy Brett Pinon. (Ex. 72)

95. Ms. Timpson was hired under the Programs Division led by Michael Cuffee, where she continued as a member of the programs team until her demotion to File Clerk on July 26, 2021. Ms. Timpson has met and spoken with Deputy Brett Pinion approximately four or five times, in a few meetings and via email, on overlapping objectives. (Ex. 72; Timpson Dep. 245: 11-23)
96. DA Willis testified that Ms. Timpson regularly missed work. Before her demotion, she had been given a hybrid schedule of 2/3 days on and 2/3 days off as a member of the programs team by DA Willis herself. (See Ex. 73 emails on hybrid schedule)
97. During this time, Ms. Timpson reported to her first-floor office in the Juvenile court building located at 395 Pryor Street SW (Ex. 9)
98. If Deputy Pinion reported not seeing Ms. Timpson at work, as testified by DA Willis, it is because they were not on the same team and were separated by two floors, on opposite sides of the building, both on a 2/3-day hybrid schedule with the ability to choose the days they came onsite based on their division's needs. Deputy Pinion **was never assigned** to be Ms. Timpson's report, direct report or otherwise. (See Ex. 74 video, Willis Dep. 150:5-20.)
99. When Ms. Timpson attempted to remedy the narrative of her "disappearing" by requesting a log of all security key swipes and computer logins as proof of attendance, the Defendant stated they were unable to access that information, thereby providing no evidence of attendance issues despite numerous requests throughout the discovery period. (See Ex. 75 request for login data.)
100. Valencia Younger, who was Ms. Timpson's first and direct-report supervisor after Ms. Timpson was demoted to file clerk in the records department, provided a letter of

recommendation for Ms. Timpson, stating that Ms. Timpson was an excellent worker. (See Ex. 76.)

101. Notably, during her deposition, Ms. Younger admitted to being afraid, stating that she had already experienced retaliation for her favorable evaluation of Ms. Timpson's work and feared further reprisals. Nevertheless, Ms. Younger eventually stated enough truth about Ms. Timpson being an excellent worker under her direct supervision. (See Younger Dep. 65:3-25; 66:1-2.)

102. Ms. Younger, in tears, had to leave the room before even starting her deposition. Later, in her deposition, Ms. Younger disclosed that after leaving the DA's office, she was fired from Fulton County Superior Court after being asked if she was involved in this case. Ms. Younger's unwillingness to lie about Ms. Timpson's work performance cost her a job and stunted her career advancement in the Atlanta legal community. (Younger Dep. 65:1-25.)

103. Furthermore, several current employees of the DA's office have expressed concerns about potential retaliation for speaking to or about Ms. Timpson. This has resulted in untruthful statements under oath, in depositions, and off-record statements to Ms. Timpson directly. (See Ex. 77 Vanessa, Mike Makin.)

104. From March 2021 to January 14th, 2022, Ms. Timpson made countless disclosures regarding the apparent Misuse of funds in the FCDA Office. In total, 25. (Ex. 78)

Respectfully submitted on April 12, 2025,

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