

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF ARKANSAS  
3 FAYETTEVILLE DIVISION

4 TABATHA L. KING,

5 Plaintiff,

6 vs. No. 3:21-CV-03086-TLB

7 BAXTER COUNTY, ARKANSAS JOHN MONTGOMERY, Sheriff, in his  
8 individual and official capacity; SERGEANT STEVEN GOODE;  
9 and DOES 1-10, in their individual and official  
10 capacities,

11 Defendants.

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13 VIDEOCONFERENCE DEPOSITION OF STEVEN GOODE  
14 TAKEN ON BEHALF OF THE PLAINTIFF  
15 ON OCTOBER 13, 2023, BEGINNING AT 1:43 P.M.  
16 ALL PARTIES APPEARING REMOTELY  
17 REPORTED BY KERRI PIANALTO, CCR

18 APPEARANCES:

19 By videoconference on behalf of the PLAINTIFF

20 George M. Rozzell  
21 MILLER, BUTLER, SCHNEIDER, PAWLIK & ROZZELL  
22 224 South 2nd Street  
23 Rogers, Arkansas 72756  
24 479-621-0006  
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By videoconference on behalf of the DEFENDANT BAXTER  
COUNTY, ARKANSAS JOHN MONTGOMERY, SHERIFF

Susan Kendall  
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1 yourself to anyone else?

2 A No, sir.

3 Q You never sent photographs to Ms. Brison?

4 A Just facial selfies.

5 Q What would you send to Ms. Brison?

6 A Just my face, like from shoulder up.

7 Q Were you with clothes on or without clothes on?

8 A With clothes on.

9 Q Who else did you send any images of yourself --  
10 to whom else did you send any other images of yourself who  
11 was an employee at the Baxter County Sheriff's Office?

12 A I don't recall anybody else.

13 Q Heather Porter, was that her last name?

14 A Yes, sir.

15 Q So Heather Porter, you sent photographs of  
16 yourself to Ashley Brison, you sent photographs of  
17 yourself to Ms. King, correct?

18 A Yes, sir.

19 Q And when you would send those photographs, would  
20 you delete them immediately or did you delete them later  
21 on?

22 A Immediately.

23 Q Would you delete the text message chains  
24 immediately that you would have with these individuals?

25 A Yes, sir.

1 Q Why would you do that?

2 A I didn't want my wife seeing what I was saying  
3 to somebody else.

4 Q Your wife being Ms. Crystal Rowden?

5 A Yes, sir.

6 Q But you all weren't married at the time, you got  
7 married in 2000 --

8 A Yes, sir.

9 Q When were you -- when were you married?

10 A We were engaged at the time.

11 Q And you don't have any of these text messages or  
12 photographs that you sent to any of these women at this  
13 point today, correct?

14 A No, sir.

15 Q And you didn't have them at the time the lawsuit  
16 was filed?

17 A No, sir.

18 Q When you were brought in -- or notified of your  
19 termination, at any point in time did the sheriff's office  
20 ask you to keep those messages or turn those messages over  
21 to them?

22 A No, sir.

23 Q Did they -- did they bring you in for any aspect  
24 of an interview or investigation into your actions?

25 A No.

1 testified to.

2 MR. ROZZELL: Well, I believe that the text  
3 messages that we've introduced and showed dictate that she  
4 says the word "stop" immediately after a photograph.

5 MS. WITHERSPOON: I believe his testimony was  
6 that it looked like something had been cut off.

7 MR. ROZZELL: That was for a different message  
8 chain, but I digress, it doesn't matter.

9 MS. KENDALL: It was for the same message chain  
10 because he said it was incomplete and there were selected  
11 texts provided to us in the course of discovery, so I'm  
12 going to object, too.

13 MR. ROZZELL: Sure, I understand your objection.

14 Q (BY MR. ROZZELL) All right. So at some point  
15 in time, those messages with Ms. King stopped, correct?

16 A Well, she sent me messages, but I don't have  
17 those, so.

18 Q She sent you photographs?

19 A Yes.

20 Q Nude photographs?

21 A Yes, sir.

22 Q Did you report those to anybody at the jail?

23 A No, sir.

24 Q And I'm correct that it's your testimony today  
25 that at no point in time during your employment at the

1 jail did you engage in any physical sexual activity with  
2 Ms. King?

3 A Can you define sexual?

4 Q Oral sex?

5 A No, sir.

6 Q Kissing?

7 A Kissing?

8 Q Yes.

9 A Yes, we kissed.

10 Q When did that happen?

11 A It happened in the stairwell, it happened in the  
12 mat -- where we kept the mats.

13 Q Tell me about that, about that occasion.

14 A Which one?

15 Q The one in the stairwell first.

16 A Okay. It was around shift change.

17 Q Do you know about when it was as far as the  
18 date?

19 A Sometime in the fall.

20 Q The fall of what year?

21 A 2019.

22 Q Okay.

23 A And everybody was doing pass on or talking, so I  
24 asked her to assist me on getting mats. We went outside  
25 to get the mats. I went -- we got into the shed and I

1 started reaching for mats and walking them out the door,  
2 sliding them down the stairs and she came up to me and  
3 asked me what I was doing, and I said I'm grabbing mats,  
4 are you going to help me? And she goes, well, that's not  
5 why I came with you, and I said what do you mean? She  
6 goes, well, you know what I want. And I said, well, we  
7 can't do that. She goes, yeah, we can, nobody's here,  
8 nobody's going to know, and she came towards me and  
9 temptation took over and we started kissing. I had my  
10 hands on her, she had her hands on me.

11 **Q Stop, stop. Your hands on her, explain what**  
12 **that means.**

13 A Like I was grabbing her butt --

14 **Q Above -- on top of the clothes or below the**  
15 **clothes?**

16 A On top of the clothes.

17 **Q Did your hands go below her clothes that day?**

18 A No, sir.

19 **Q Okay.**

20 A And then she grabbed my belt buckle, undid my  
21 belt and undid my pants and grabbed my penis and kept  
22 asking me to take her onto the mats, and I said, no,  
23 somebody is going to come up here, and then I heard a  
24 voice of another jailer asking if we needed any help. At  
25 that point I hurried up, put my -- zipped my pants,

1 buttoned back up, put my belt on, you know, straightened  
2 ourselves out and grabbed the mat and walked back outside.

3 Q Did she -- did you insert or did she take your  
4 penis in her mouth?

5 A No, sir.

6 Q Was she on her knees in front of you like she  
7 was going to perform that act?

8 A No, sir.

9 Q So your testimony is it was only hands upon your  
10 penis?

11 A Yes, sir.

12 Q Did you report that incident to anybody?

13 A No, sir.

14 Q Did you tell anyone about that incident?

15 A No, sir.

16 Q And I don't want to know about what you told  
17 your lawyer, but is this the first time you've told that  
18 narrative to anybody today?

19 A Besides my lawyer?

20 Q Yeah, I don't want to know what you talked about  
21 with your lawyers.

22 A No, sir, I haven't told anybody.

23 Q Have you told your wife?

24 A No, sir.

25 Q Did you ever talk to Sheriff Montgomery about

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

2 STATE OF ARKANSAS )  
 ) SS:  
3 COUNTY OF WASHINGTON)

4 I, Kerri Pianalto, Certified Court Reporter  
5 within and for the State of Arkansas, do hereby certify  
6 that the above-named STEVEN GOODE was by me first duly  
7 sworn to testify the truth, the whole truth, and nothing  
8 but the truth, in the case aforesaid; that the above and  
9 foregoing deposition was by me taken and transcribed  
10 pursuant to agreement, and under the stipulations  
11 hereinbefore set out; and that I am not an attorney for  
12 nor relative of any of said parties or otherwise  
13 interested in the event of said action.

14 IN WITNESS WHEREOF, I have hereunto set my hand  
15 and official seal this 19th day of October, 2023.



16  
17 KERRI PIANALTO, CCR  
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19 State of Arkansas, No. 651  
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