IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.,
Plaintiff,

vs. CASE NO. 05-CV-00329-GKF SAJ

TYSON FOODS, INC., et al.,
Defendants.

DEPOSITION OF GARY STANSILL
TAKEN ON BEHALF OF THE DEFENDANTS
ON APRIL 8, 2009, BEGINNING AT 8:30 A.M.
IN TULSA, OKLAHOMA

APPEARANCES:

On behalf of the PLAINTIFF:
Mr. Pat Green
RIGGS, ABNEY, NEAL, TURPEN, ORBISON & LEWIS
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On behalf of the DEFENDANT-PETERSON FARMS, INC.:
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REPORTED BY: Laura L. Robertson, CSR, RPR

(APPEARANCES CONTINUED)

On behalf of the DEFENDANT-GEORGE'S, INC. AND GEORGE'S FARMS, INC.:

Mr. Earl Buddy Chadick
THE BASSETT LAW FIRM
221 North College Avenue
Fayetteville, Arkansas 72702
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On behalf of the DEFENDANT-CARGILL, INC. AND CARGILL TURKEY PRODUCTION:

Mr. Todd P. Walker
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1 THE VIDEOGRAPHER: This deposition of Gary
2 Stansill, taken in the matter of the state of Oklahoma
3 versus Tyson Foods, et al. It is being heard before
4 the U.S. District Court for the Northern District of
5 Oklahoma, Case Number 05-CV-00329-GKF-SAG.
6 It is being held at 100 West 5th Street in
7 Tulsa, Oklahoma, on the 8th of April, 2009. We are on
8 record at 8:48 a.m. My name is Stephen Carns, I'm the
9 videographer, the court report is Laura Robertson.
10 Counsel please introduce yourselves and your
11 affiliations, and the witness will be sworn.
12 MR. WALKER: Todd Walker with Faegre &
13 Benson representing the Cargill defendants.
14 MR. MIRKES: Craig Mirkes for Peterson
15 Farms.
16 MR. CHADICK: Buddy Chadick for George's,
17 Incorporated.
18 MR. GREEN: Pat Green for the State of
19 Oklahoma.
20 WHEREUPON,
21 GARY STANSILL,
22 after having been first duly sworn, deposes and says
23 in reply to the questions propounded as follows,
24 to-wit:
25 BY MR. WALKER:

Q. Boating?
A. Yes. I have a small lake house that we have up there on Grand.
Q. You and Mr. Steele both, uh?
A. Real close.
Q. You guys probably have played some cards once in a while, I guess?
A. Yes.
Q. Your job over the course of the last 35 years of working for the city of Tulsa Police Department is to be familiar with the laws of Oklahoma. Is that a fair statement?
A. Criminal laws, yes.
Q. Based on the knowledge of laws that you have obtained in the course of your work, did you see any violation of law by any poultry grower or integrator company?
MR. GREEN: Object to the form. Go ahead.
THE WITNESS: No.
Q. (BY MR. WALKER) Do you believe you have an obligation to report a violation of law if you see one?
A. Well, if it is a -- if it resorts to the level of felony, I believe, yes, if we saw a felony violation, a robbery or some felony.

Q. You didn't run a single test on any material that you saw being spread on the land; correct?
A. Correct.
Q. You didn't take a single field soil sample of any of the fields in the IRW, did you?
A. No.
Q. And you didn't observe any runoff or take any samples of any runoff of water from any field; right?
A. Right.
Q. You didn't investigate the extent or location of cattle operations in the IRW; correct?
A. Correct.
Q. And you didn't investigate the location and function of any septic systems in the IRW, did you?
A. No.
Q. And you didn't see any illegal activity by any grower or integrator in the IRW; correct?
MR. GREEN: Object to the form.
THE WITNESS: Well, I wouldn't know if that would be, in what regards, do you mean criminal activity?
Q. (BY MR. WALKER) Any activity that you understood to be illegal?
A. No.