
EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONALD JONES,)

Plaintiff,)

v.)

Case No: 1:07-CV-0567-CC-RGV

WACKENHUT % GOOGLE INC.,)

Defendant.)

DECLARATION OF JENNIFER TURNER

1.

I, Jennifer Turner, am of majority age, competent to testify and make this Declaration based on personal knowledge of facts I know to be true and correct.

2.

Since 1999, I have been employed with The Wackenhut Corporation ("Wackenhut"). Wackenhut is a commercial security company which provides commercial security services to customers on a nationwide basis.

3.

Wackenhut employs security guards, who have numerous job duties, including patrolling customer job sites, reporting security breaches, and communicating with emergency services when necessary, among others.

4.

Wackenhut's clients determine the number of security guards needed for their businesses and the hours of those guarding assignments.. Because Wackenhut's business is premised on providing service at or above the customer's expectations, if a customer instructs Wackenhut to end the assignment of a security guard for legitimate reasons, Wackenhut complies with the customer's request.

5.

Google, Inc. ("Google") is an important Wackenhut client in Atlanta, Georgia. In 2006, I was the Site Security Manager who worked onsite at Google's Atlanta facility and supervised the Wackenhut security guards on assignment there.

6.

In 2006, I was supervised by Carlos Garcia, who was Wackenhut's Account Manager over the Google account. In 2006, J.E. Penifold was employed with Google as the Facility Manager at Google's Atlanta facility. In 2006, if Google had questions or concerns about a Wackenhut guard, Mr. Penifold addressed those issues with me.

7.

Wackenhut has guards on assignment at Google twenty-four hours a day (in first, second and third shifts), seven days a week. During any given shift,

approximately 16 to 21 Wackenhut guards are patrolling Google's facility and monitoring the security posts.

8.

Google has entrusted Wackenhut to provide security services to minimize the risk that confidential and proprietary Google information is stolen. To support those security efforts, Google and Wackenhut have adopted policies which prohibit Wackenhut security guards from sleeping during their scheduled shifts. If a Wackenhut guard is caught sleeping on the job, Wackenhut takes disciplinary action against the guard, which could include ending the guard's assignment or terminating the guards' employment.

9.

Donald Jones began a guarding assignment at Google in December 2005. I was Mr. Jones' supervisor.

10.

On July 21, 2006, Mr. Penifold sent me an email indicating that he had personally observed Mr. Jones sleeping on the job at a security post. A true and correct copy of Mr. Penifold's email to me is attached as Exhibit 1.

11.

I forwarded Mr. Penifold's email to my supervisor (Carlos Garcia) and to Donnie Hixon, who was Wackenhut's Operations Manager in 2006.

12.

Based on Wackenhut's receipt of Mr. Penifold's complaint about Mr. Jones and on Wackenhut's policy which prohibits guards from sleeping on the job, Mr. Garcia, Mr. Penifold and I decided to end Mr. Jones' guarding assignment at Google.

13.

Mr. Jones' replacement at Google was Charlie Griffin, an African-American.

14.

In making the decision to end Mr. Jones' assignment at Google, I did not consider Mr. Jones' race or age. Likewise, I did not consider Mr. Jones' prior filings with the Equal Employment Opportunity Commission as a factor when making that decision.

15.

If Wackenhut had allowed Mr. Jones to remain on assignment at Google after July 21, 2006, I believe that Wackenhut's relationship with Google would have been negatively impacted, considering Mr. Penifold's instruction (in his July 21 email to me) to "handle this matter expeditiously."

16.

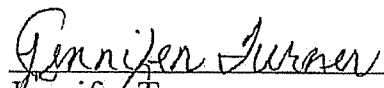
I am an African-American, and I am 45 years old.

17.

J.E. Penifold is no longer employed with Google. It is my understanding that he voluntarily resigned to pursue other career opportunities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of February, 2008.



Jennifer Turner

EXHIBIT 1

Jennifer Turner

From: Jennifer Turner [jturner@google.com]
Sent: Friday, July 21, 2006 5:13 PM
To: 'dhixon@wackenhut.com'
Cc: 'cgarcia@wackenhut.com'
Subject: FW: Attention to Duty

-----Original Message-----

From: JE Penifold [mailto:jepenifold@google.com]
Sent: Friday, July 21, 2006 5:08 PM
To: 'Jennifer Turner'
Subject: Attention to Duty

Today at approximately 1645 hrs I was investigating potential loss of power in the facility and walking the south wall looking for EGEN status.

During my transit east through the south corridor at the end of the transportation aisle, near post 10, I observed SO Jones asleep at his post in the chair. I went outside of the building to check my EGEN units; on my subsequent re-entry to the building I again past post 10 where SO Jones was still asleep.

We cannot tolerate this type of activity as our business nature is one of utmost security. A single event of this nature could compromise trade secrets by allowing our competition to view our activities. I favor our relationship with Wackenhut Security and know this is not the standard of service normally provided to us.

Please handle this matter expeditiously.

JE Penifold
Facility Manager
LSDC