

1 THE WITNESS: Numerous times. Like every few  
2 days I'm in there.

3 BY MR. HANLON:

4 Q. Every few days? All right.

5 A. Yes.

6 Q. Since September 12th have you been in the  
7 Dollar General store?

8 A. Yes.

9 Q. Approximately how many occasions?

10 A. Three times, maybe.

11 Q. And that Dollar General store is within a  
12 thousand feet of the place of employment of

13 Ms. Forsythe; isn't that correct?

14 A. No, it is not.

15 Q. Have you measured it?

16 A. Actually, yes, I have.

17 Q. How did you measure it?

18 A. Because utility poles are spaced 250 feet  
19 apart, and it's a distance of more than four utility  
20 poles which are all along on the west side of Route  
21 102. You can actually visualize that from where the  
22 courtyard is between the buildings of where her alleged  
23 office is and the Dollar General it is over a thousand  
24 feet.