

Exhibit D

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

DOUGLAS CARL,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.
)	
FULTON COUNTY, GEORGIA;)	1:07-CV-1812-WBH-AJB
and THOMAS ANDREWS,)	
)	
Defendants.)	

AFFIDAVIT OF VALARIE WILSON

Personally appeared before me the undersigned, VALARIE WILSON,
known to be the person herein and after first being duly sworn, stated and deposed
that the following statements are true and correct.

1.

My name is Valarie Wilson. I am over the age of legal majority and
competent to testify with regard to the matters stated herein. I have personal
knowledge of the facts stated in this affidavit.

2.

I worked for the Fulton County Human Services Department from 1989 to
2006. In the late 1990s, I was promoted by Thomas Andrews from Deputy
Director to Director of the Department.

3.

I am an African-American woman. My predecessor was also an African-American woman.

4.

As Director, I supervised Doug Carl. Before he became the Deputy Director of the Department, he was one of the division managers.

5.

In any role, Doug was always reliable, driven, and committed to the purpose of the Department. In fact, he was a natural leader with an unparalleled commitment to the Department and its customers. As such, I promoted him every opportunity I had.

6.

I also promoted and hired three other white males into management positions during my tenure as Director. As a result of these promotions or hirings, I was warned by former Deputy County Manager, Keith Chadwell, that Emma Darnell noticed that I had brought on "too many white boys."

7.

At a Board of Commission meeting in 2005, I was warned by Commissioner Bill Edwards that Emma Darnell said I had "too many white boys" surrounding me. Prior to this meeting, Doug and Gerry Easley, the two deputy directors of the department, both of whom are white males, attended Board meetings with me. After Commissioner Edwards relayed Commissioner Darnell's concern, I realized then I could get more accomplished if I dismissed one of my white male deputy directors from the meetings. From that point forward, I excluded Mr. Easley from Commission meetings.

8.

I supported Doug's attempt to take my place as Director. There was no doubt in my mind that Doug Carl was the best candidate for the job. I made my feelings known to both Keith Chadwell and Tom Andrews. Keith mentioned to me at that point that Commissioner Darnell wanted a black woman in the Director position.

9.

When I learned that the search for the new Director was being extended, I was not surprised to learn that Commissioner Darnell had insisted that the search be extended even though Doug was one of the names pitched to her as a possible

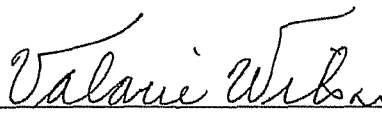
replacement. I was afraid that she would not allow Doug to be promoted because he is a white man.

10.

After the position was filled by Yvonne Gilchrist, I discussed the fact that Doug did not get the promotion with Keith Chadwell. Keith told me that Tom did not appreciate that Doug mentioned during his interview that he needed to make a decision about the position.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of June, 2008



Valarie Wilson