CAUSE NO. 3041561

THE STATE OF TEXAS	§ IN THE DISTRICT COURT OF
	§
VS.	§ TRAVIS COUNTY, TEXAS
4	§
RHONDA LEE GLOVER	§ [167TH JUDICIAL DISTRICT]

BOND REDUCTION HEARING VOLUME 2 OF 18 VOLUMES

Rhonda Lee Glover, 1355639 Dr. Lane Murray Unit – TDCJ-CID 1916 North Highway 36 Bypass Gatesville, Texas 76596-0001 Rhoden

David H. Rhoden, D.D.S.

General Dentistry

Complete Implant Treatment with Surgery and Restorative Placement

- Advanced Contemporary Esthetic Diagnosis and Treatment Baylor College of Dentistry
- Master Austhetic Dentistry Las Vagas Institute for Advanced Dental Studies
- Board Certified in Implant Dentistry by ABOI
- Diplomate American Board of Oral Implantology
- Fellow Misch Implant Institute
- Fellow International Congress of Oral Implantology
- Fellow American Academy of Implant Dentistry
- Comprehensive Restorative and Surgical Adult Dentistry
- National and International Lecturer on Patient Treatment and Management
- Bachelor of Science Degrae Stephen F. Austin State College
- **Doctor of Dental Surgery** University of Tennes:
- Zoom Laser Teeth Whitening
- Specialize in Sodation Dentistry
- Biolase Waterlase Laser National Lecturer
- Botox Facial Enhancement Injections
- American Dontal Association
- Over 20 Yours Experience

A long time friend that wanted to testify on my behalf at trial was not given the opportunity even after numerous calls to my former attorney, Sawyer Haynes.

Karen Hollenbeck Investigator 600 Jefferson #1000 Houston, Texas 77002

June 30, 2011

Dear Ms Karen Hollenbeck,

This letter is in regard to Rhonda Glover #1355639 who is serving a prison sentence in Gatesville Texas. I would like to share some facts with you in regard to Rhonda Glover.

I have known Miss Glover for 22 years. I volunteered for testimony in her bond hearing in Austin when she was arrested. Her attorney "Sawyer" called me three months prior to her trial to ask me if I would testify on behalf of Rhonda Glover. I said I would and marked the tentative dates on my office calendar. I know I had to share some facts on behalf of Miss Glover that I felt the court should be aware of, plus I wanted to be a character witness for Miss Glover. Mr. Sawyer never called me when the trial approached. My calls to his office and my secretary's calls to inquire about when I was to testify were never returned. Neither Racehorse Haynes nor Lanza ever called me. I feel Miss Glover never received a fair trial and was represented in an extremely negligent manner. I interview with the television program "Snapped" to help in Miss Glover possible retrial. Ms Hollenbeck, Miss Glover had been threatened many times by Mr. Joste Important information should have been reveled in the original trial and Mr. Sawyer poorly represented her.

I appreciate your time.

Sincerely,

All

A Committment to Excellence

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	§	
RHONDA LEE GLOVER	§	[167TH JUDICIAL DISTRICT]

See Dr. Rhoden's testi mony which

BOND REDUCTION HEARING VOLUME 2 OF 18 VOLUMES

would have helped me @ trial. Sawyer never neturned his calls

> Rhonda Lee Glover, 1355639 Dr. Lane Murray Unit – TDCJ-CID 1916 North Highway 36 Bypass Gatesville, Texas 76596-0001

1	REPORTER'S RECORD
2	VOLUME 2 OF 18 VOLUMES
3	TRIAL COURT CAUSE NO. 3041561
4	
5	THE STATE OF TEXAS * IN THE DISTRICT COURT
6	VS. * TRAVIS COUNTY, TEXAS
7	RHONDA GLOVER * 167TH JUDICIAL DISTRICT
9 10 11	BOND REDUCTION HEARING
12 13 14 15	BE IT REMEMBERED on the 25th day of April, 2005,
16	the following proceedings came on to be heard in the
17	above-entitled and numbered cause before the Honorable
18	Mike Lynch, Judge Presiding, held in Austin, Travis County,
19	Texas:
20	Proceedings reported by Stenographic Shorthand Machine
21	Method.
22	
23	
24	ORIGINAL
25	ONTONAL

THE COURT: All right. The witnesses that 1 00:08:24 were previously sworn, State has invoked the rule. That 2 00:06:27 means you must remain outside the courtroom until it comes 3 00:08:30 your time to testify and not to speak to anyone about the 00:06:34 5 case except the lawyers. I'm sorry, I need to do that at 00-04-37 this time based on their recommendation or request. Thank 00:06:41 6 7 00:08:43 you. 00:08:43 8 Q. (By Mr. Grigson) Dr. Rhoden, you understand Rhonda is here charged with a very serious crime, don't you? 00:06:48 00:08:50 10 A. Yes, sir. Q. You understand the person she is charged with 00:06:51 11 shooting is Jimmy Joste? 00:08:54 12 00:06:58 13 A. Yes. 00:06:58 14 Q. Did you see her during the time she had an on again 00:07:01 15 off again relationship with Jimmy Joste? 00:07:02 16 A. Yes. Q. Your relationship was on again off again at the 00:07:03 17 00:07:07 18 same time she was with him? 00:07:08 19 Oftentimes, yes. 00:07:09 20 Do you know that she has got a son? 00:07:11 21 A. Yes. 00:07:11 22 What sort of relationship was her son like? First of all, how old is he? 00:07:17 23 00:07:18 24 A. Ten. 00:07:19 25 What is her relationship with her son?

Austin. We went out, and I carried on a contact with her, 2 3 you know, by phone, a lot during that time, you know. 00:05:05 Q. So even if you didn't see her, you stayed in touch 00-05-08 4 5 where her? 00:05:11 6 A. Oh, yeah, oh, yeah. 80:05:12 7 Q. By phone, e-mail? 8 Some by e-mall, uh-huh. 00:05:15 g Were you familiar that Rhonda -- how did she 00:05:17 10 support herself? 00:05:21 11 A. She was an insurance head hunter, by that she found 00:05:22 00:05:27 12 clients for insurance companies that needed employees, actuaries, different type of people in the insurance 00:05:31 13 00:05:35 14 business. 00:05:38 15 Q. Did she seem to be able to support herself or was she relying on somebody else to support her? 00:05:39 16 A. Entire time that I knew Rhonda, she was a very 00:05:41 17 Independent business lady, had her own business, seemed very 00:05:46 18 confident, very aggressive in business, very go-getter, you 00:05:51 19

know. She was always looking for the next client and trying

to position that person. She never -- she was always very

delightful, very attractive, you know, knew everybody. Just

MR. O'CONNELL: Excuse me. Your Honor, may we

like was, you know, very upstanding person.

go ahead and invoke the rule at this time, please?

A. The last time I saw Rhonda was July of 2001 here in

A. Well, I was -- I knew Rhonda and saw her during the 00:07:21 time that she had her son, but she was one of the most 2 00:07:30 motivating -- she doted on her son all the time. She always 3 00:07:39 found -- gave him the best of care, best instructors, 00:07:45 teachers. She was a highly motivated person to the child. 00:07:49 6 Whenever the child did something, she always encouraged him 00:07:54 do this and how good he was, et cetera, et cetera, et cetera. 00:07:56 She was even -- the times that she would go out, she was very R 00-07-50 reluctant to even get a baby-sitter because she just loved 00:08:02 9 her son so much, and she was very I mean -- I couldn't -- I 00:08:06 10 did not and have not met a person that was more respectful or 00:00:13 11 00:08:19 12 more loving of a child than Rhonda Glover was. 00:08:24 13 Q. Did you see Rhonda just in the last couple of months? 00:08:27 14 00.0828 15 A. Yes. Where dld you see her? 00:08:29 16

00:08:30 17 A. I went to Vernon, Texas and saw her. Q. And when you visited her at Vernon, what did you

00:08:33 18 00:08:38 19 think about Rhonda's state of mind? Did she appear to be 00:08:40 20 okay to you?

A. Yes, very impressive. In fact, she had made me a 000041 21

> bird house made out of wood that was quite intricate, but anyway, yes, I was there a little over an hour, visited with

00:08:56 24 her and was very impressed with her.

Q. Did it bother her quite a bit to be incarcerated DO:08:59 25

00:08:45 22

00:08:52 23

00:05:57 20

00:06:00 21

00 06:05 22

00:06:14 23

00:06:17 24

00:06:19 25

1 00:04:55

13

A. Aggressively defending herself, absolutely. 1 00:10:14 MR. GRIGSON: I will pass the witness. 2 **CROSS-EXAMINATION** 00:10:26 Questions by Mr. O'Connell: 4 00:10:26

than trying to defend herself in this case?

Vernon that she had any intention of doing anything other

Q. Good morning, doctor. Would you please spell your 5

6 last name? 00:10:31

00:10:07 24

00:10:11 25

7 A. R-H-Q-D-E-N. 00-10-31

Q. And may I have your date of birth? 8

7/10/44. 9

00:10:41 10 Q. July 10, 1944?

A. Yes, sir. 00:10:44 11

Q. Had you ever been around the defendant in this case 00:10:50 12

and the victim Jimmy Joste together? 00:10:52 13

A. Never. 00:10:57 14

00:10:57 15 Q. So you have no knowledge about the type of

relationship the defendant had with the victim? 16

A. Only --00:11:02 17

Q. Only through what she told you? 00:11:04 18

00:11:05 19

Q. No personal observations? 00:11:0e 20

00:11:08 21 A. None.

Q. Have you ever known the defendant to possess a 00:11:08 22

00:11:10 23 handgun or any gun?

00:11:12 24 A. Never

Q. Have you ever known her during the time you have 00:11:12 25

1 loste? 00:12:35

00:12:20 24

00:12:31 25

00:12:35 2 A. Yes.

3 Q. And how did you happen to meet him? 00:12:35

A. No, sir.

 A. I was visiting a friend of mine in Houston, Texas, 00:12:37

and this is probably three or four years before I met Rhonda 5 00:12:41

6 and he was at my friend's house with another girl, whose name 00:12:47

Q. Had you ever met the victim in this case, Jimmy

15

happened to be Rhonda too, and It was just a get-together for 7 00:12:53

lunch or something like that, and that is when I met him at 8 00:12:58

9 that time. 00:12:59

00:13:03 12

00:13:23 16

Q. And can you tell me the name of the friend that m-12-59 10

introduced you all? 00:13:01 11

A. Yes, John B-A-L-I-S, John Ballis.

Q. So as I understand it, the last time you saw the 00:13:12 13

defendant besides your visit to Vernon's and here in the 00:13:16 14

courtroom would have been July of 2001? 00:13:21 15

A. Correct.

00:13:23 17 Q. And you may have already answered this, but was

00:13:26 18 that here in Austin?

00:13:27 19 Yes.

00:13:27 20 Q. Was that at her home?

A. No, sir. It was not at her home. It was at 00:13:29 21

restaurant, a -- like a Japanese sushi Asian fusion type 00:13:34 22

restaurant. I can't remember exactly the name. 00:13:47 23

00:13:50 24 Q. Have you ever visited her home here in Austin?

00:13:53 25

	16
00:13:54 1	Q. What address was that roughly?
00:13:56 2	A. It was in Lakeway. She had a home in Lakeway.
00:14:01 3	Q. And who else was there at the house when you
00:14:03 4	visited?
00:14:04 5	A. Her son.
00:14:21 6	MR. O'CONNELL: Thank you, sir. No further
00:14:22 7	questions, your Honor.
00:14:24 8	THE COURT: Anything further?
00:14:24 9	REDIRECT EXAMINATION
00:14:27 10	Questions by Mr. Grigson:
00:14:27 11	Q. Dr. Rhoden, you understand that what Rhonda is
00:14:30 12	charged with, and your testimony would still be the same as
00:14:34 13	far as you think that Rhonda, other than what she Is
00:14:38 14	charged with in this case, has ever shown any tendencies to
00:14:42 15	be violent or aggression to any other person?
00:14:45 16	A. No way, physically, no way.
00:14:48 17	Q. And do you still believe after your visit with
00:14:52 18	Rhonda in Vernon that she would comply with any conditions
00:14:56 19	that were set by this court on a bond if you were to reduce
00:14:59 20	the bond that she could make?
00:15:01 21	A. Sir, that is my belief, yes.
00:15:03 22	RECROSS-EXAMINATION
00:15:04 23	Questions by Mr. O'Connell:
00:15:04 24	Q. Is your belief so strongly that you would be
00:15:07 25	willing to put up all or part of your dentist practice to

		18
00:16:42	1	believe beforehand, without a doubt, she was a nonviolent
00:16:48	2	person. I still believe she is a nonviolent person. Her
00:18:50	3	situation in Vernon, contrary to what I had read like in the
00:18:55	4	newspaper in regard to this case, okay, was 180 degrees from
00:18:50	5	what I had read, you know, and her explanation of events, et
00:17:04	6	cetera, like there was plausible, so to say I am of a firm
00:17:13	7	belief that if she was allowed to be released on a lower bond
00:17:17	8	that she would aggressively help to defend her case and she
00:17:21	9	would not depart the country and she would, like I say, try
00:17:25	10	to be as close to her son, and as far as me putting up the
00:17:29	11	ball money, I still say no.
00:17:31	12	Q. Let me ask you another question. You mentioned you
00:17:34	13	spoke with her about what happened in this case. What did
00:17:38	14	she tell you?
00:17:38	15	A. What did she tell me about the case?
00:17:40	16	Q. Did she tell you she killed her common law or
00:17:44	17	friend Jimmy Joyce?
00:17:45	18	A. Yes. She didn't say it outright because that was
00:17:50	19	like an assumption we both thought. What she told me, sir,
00:17:55	20	was and a lot of this fell into the perception that I had
00:18:01	21	had, even the times like when I was not with Rhonda over the
00:18:08	22	period of time when I was not actually seeing her, she

17 00:15:10 secure that bond? A. Is that a question that I have to follow up with? 00:15:18 Q. Absolutely, because here is why I am asking. 00:15:21 THE COURT: Walt a minute. I am not sure he 00:15:24 00:15:26 understands. Is he going to have to bring his practice down 6 here and hand it over to you? 00:15:30 Q. Are you willing to secure her attendance in court, 7 00:15:32 8 her bond, with your personal assets? 00:15:35 9 A. Would I be held responsible to do it if I said yes? 00:15:40 00:15:45 10 Q. If she said yes and you didn't show up, you would 00:15:48 11 forfelt those assets. Are you willing to do that? 00:15:52 12 A. Are you asking me that I put up the bond? 00:15:54 13 Q. Yes, sir, exactly. 00:15:56 14 A. I wouldn't do that. 00:15:57 15 Q. Why not?

A. Well, you have to realize I have known Rhonda for 15 years. I have not had a relationship with her for five years, basically, okay. During that period of time, I had remarried, okay, and I was asked to come here to give my assessment of Rhonda based on what I knew about her, okay, and what I have known about her is what I have explained to vou-all. Now, like I say, I did see her in June -- In July

of 2001 and I saw her in Vernon just six weeks or something

like ago. My perception Is what I have told you about. I

Q. In order to keep this hearing --A. Prior to her ever having the altercation with him. 00:18:18 Q. What did she tell you about killing Jimmy Joste? 00:18:23 4 A. She said that she -- she led it up to this. She 00:18:27 5 said that over the past year or two or something like that, 00:18:39 6 she had called Austin police because he had violated a 00:18:48 7 restraining order that she had on him a number of times, and 00:18:51 8 the police department had never done anything to I guess imprison him, et cetera, like that, and she was very fearful 00:18:58 00:19:03 10 of him. That once he tried to run her off the road and 00:19:06 11 actually took a shot at her out of the window of a car at 00:19:11 12 her. He -- feared for her.

expressed a fear of Jimmy Joyce.

A. You know. That was one.

19

Q. Okay.

She at the time, she had -- at the time of the shooting, that she had stopped by her home briefly because she had rented an RV vehicle and was going on a trip with her son, and she had stopped by the home to stop, get something, or drop off something, and he surprised her there at the home and was aggressive toward her to where she feared for her life and she shot him. That is what I basically got out of

00:19:48 21 Q. Did she elaborate on what aggressive towards her 00:19.50 22 meant. Did she give you any examples? 00:19:52 23 A. Well, she, she, she said that like he was like

physically threatening her. She didn't go into -- to me I don't recall her going into actual aggressive detail or he

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00:19:58 24

00.39:05 1 Q. Have you talked to your ex-wife about the fact that 00:39:09 2 he is making honor roll and making good grades?

1 years.

Q. How would you describe their relationship in terms

of did they live together the entire time?

32 showed up on the -- against the property. I don't know who it is for, what it is or anything about it. 2 00:34:39 3 Q. You mentioned your daughter's son several times, 4 your grandson, correct? 5 6 Q. Was there a time when you felt concerned for the safety of that boy and either you or your ex-wife removed him 7 00:34:54 8 from your daughter's care? 9 A. My ex-wife did, yes, sir. 00:35:01 00:35:03 10 Q. And did you share her concerns about the safety of 00:35:06 11 that child? 00:35:07 12 00:35:07 13 Q. What were you concerned about, sir? 00:35:10 14 A. Well, I just didn't think it was a safe environment 00:35:14 15 that he was in at the time. 00:35:16 16 Q. Specifically what? 00:15:18 17 A. I don't know a lot about it, I don't -- my wife 00:35:22 18 handled most all of that, sir. I was out of town most of the 00:35:25 19 00:35:25 20 Q. But you said you were -- you shared the concern? 00:35:28 21 A. I shared the concern with her when she was talking 00:35:31 22 with me and discussing with me. I don't know the whole 00:35:35 23 particulars about it. I just talked to her about it a little

If you shared the concern, you must have had some

1 Q. You weren't concerned about whether or not anybody 2 was using drugs in the home? 00:35:59 3 00:37:00 A. I didn't know anybody were. Q. You weren't concerned that there might have been 5 some bizarre religious practices going on in that home? 6 A. I did not know anything about that. I heard about 00:37:09 00:37:15 7 it, but I did not know about it firsthand. 00:37:16 8 Q. What had you heard? 00:37:18 9 A. Just that there was talking about John Chandler 00:37:27 10 being the chosen one, I believe is what it was. 00:37:30 11 Q. Okay. Chosen one was in second coming of Jesus 00:37:34 12 Christ? 00:37:35 13 A. Right. 00:37:35 14 Q. Had you heard anything about drug use in that 00:37:38 15 house? 00:37:38 16 A. No, I did not. 00:37:41 17 Q. Have you talked to your daughter about this shooting? 00:37:46 18 00:37:48 19 A. No. I have not. 00:38:04 20 MR. O'CONNELL: Pass the witness, your Honor. 00:38:04 21 REDIRECT EXAMINATION 00:38:06 22 Questions by Mr. Grigson: 00:38:07 23 Q. Mr. Glover, as far as what your knowledge of, your 00:38:10 24 knowledge about what was going on over there on Mission Oaks, 00:38:14 25 you gained your knowledge basically from talking to your

1 00:35:41 feeling. 2 00:35:43 THE COURT: One person at a time. This lady has to take down everything you say. Let him finish his 00-35-48 question and you give your answer and we will keep it all 00:35:50 5 6 Q. What about the situation made you concerned it 7 might not be safe for the child? A. Just some things I talked to my ex-wife she had mentioned to me about. I did not know any of the particulars about it, I did not get off into it. I am going by hearsay 90:36:10 10 00:36:14 11 what she said. I don't know. Q. I am asking you what were you concerned about? 00:38:15 12 00:36:25 13 I didn't like the way he was home schooled at the 00:36:30 14 time, and that was my main concern, that I think he needed to 00:36:35 15 be in school. That was my main concern, that he needed to be 00:38:38 16 in school 00:36:39 17 Q. Did you support your ex-wife's removal of the child 00:38:44 18 from your daughter's care? 00:38:45 19 A. I did not. 00:38:48 20 Q. You did not? 00:36:47 21 00:36:48 22 Q. So the only thing you were concerned about in terms of health, safety and welfare of that child was the fact that 00:38:51 23 00:36:54 24 he was being home schooled? 00:36:56 25 A. Right.

1 ex-wife Sherlyn? 00:38:18 2 Q. Anything that dealt with trying to see about the 00:3B:20 situation with John Chandler was left up to her? 00:38:25 A. Yes, it was. Q. And so she took over and did everything? A. She done everything. I did not do any of it. Q. She would have more knowledge what was going on 00:38:32 00:38:34 9 over there? 00:38:34 10 A. Yes, sir. 00:38:35 11 Q. And even she hadn't been over there to visit in the 00:38:39 12 house, had she? 00:38:40 13 A. No, she had not. 00:38:41 14 Q. So her knowledge would be gained either from 00:38:44 15 talking to Rhonda or to Jimmy? 00:3847 16 A. Yes, sir. 00:38:55 17 Q. Are you familiar -- you said you were concerned 00:38:57 18 about his home schooling? 00:38:59 19 A. Yes. 00:38:59 20 Q. Rhonda was home schooling him? 00:39:01 21 A. Yes, sir. 00:39:01 22 Q. And you thought he ought to be in a regular school? 00:39:04 23 A. Yes, sir. 00:39:04 24 Q. Is he in a regular school now?

00:35:38 24

00:35:38 25

00:38:08 25

A. Yes, he is.

