

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

BLACK LOVE RESISTS IN THE RUST, et al.,
individually and on behalf of a class of
all others similarly situated,

Plaintiffs,

vs.

1:18-cv-00719-CCR

CITY OF BUFFALO, N.Y., et al.,

Defendants.

ORAL EXAMINATION OF KEVIN BRINKWORTH

APPEARING REMOTELY FROM

BUFFALO, NEW YORK

Wednesday, March 16, 2022

9:08 a.m. - 4:43 p.m.

pursuant to notice

REPORTED BY:

Luanne K. Howe

APPEARING REMOTELY FROM CUYAHOGA COUNTY, OHIO

R E M O T E A P P E A R A N C E S

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

APPEARING FOR THE PLAINTIFFS:

NATIONAL CENTER FOR LAW AND ECONOMIC JUSTICE

BY: CLAUDIA WILNER, ESQ.

275 Seventh Avenue, Suite 1506

New York, New York 10001

212-633-6967

APPEARING FOR THE DEFENDANTS:

CITY OF BUFFALO LAW DEPARTMENT

BY: CHRIS POOLE, ESQ.

ASSISTANT CORPORATION COUNSEL

1100 City Hall

65 Niagara Square

Buffalo, New York 14202

716-851-4343

ALSO PRESENT:

CHRISTINE NELSON, ESQ.

Covington & Burling LLP

I N D E X

WITNESS	EXAMINATION	PAGE
Kevin Brinkworth	By Ms. Wilner	7

E X H I B I T S

(Shown electronically to the witness)

EXHIBIT	DESCRIPTION	PAGE
BRINKWORTH		
1	BPD Organizational Chart, MOP page 41	23
2	Emails (COB039344)	32
3	Email (COB039337)	34
4	Strike Force Mission (COB060319)	35
5	Strike Force Target Area maps (COB001613)	38
6	Buffalo COMPSTAT Meeting report (COB328444)	42
7	Email (COB041842)	53
8	Emails (COB591045)	56
9	Emails (COB039610)	60
10	BPD Roadblock Directive (COB060320)	61
11	Email (COB591230)	63
12	Email (COB590997)	65
13	Emails (COB591098)	68
14	Email (COB591044)	75
15	Emails (COB056249)	78

(Exhibits continued)

E X H I B I T S (Cont.)

BRINKWORTH	DESCRIPTION	PAGE
16	Emails (COB591726)	80
17	Email (COB040356)	84
18	Email (COB040359)	85
19	BPD P-73 (COB063327)	86
20	Email (COB053722)	89
21	Emails (COB040467)	92
22	Email (COB042316)	93
23	2-6-2016 <i>Buffalo News</i> article	95
24	Ticketing Per Incident by Unit and Average Tinted Window Tickets per Incident by Month	100
25	Email (COB591650)	104
26	BPD MOP excerpt, pages 67-74 (COB000313)	110
27	VTL 511-b	112
28	Email (COB591930)	114
29	Email (COB591446)	115
30	Emails (COB591284)	118
31	Emails (COB042024)	119
33	Emails (COB040533)	119
34	MOP Chapter 15 (COB000795)	131
35	Emails (COB347125)	143
	(Exhibits continued)	

E X H I B I T S (Cont.)

BRINKWORTH	DESCRIPTION	PAGE
36	Emails (COB041829)	145
37	Emails (COB053645)	157
38	BPD P-73 (COB053881)	162
39	Emails (COB053865)	165
40	BPD P-73 (COB053610)	169
42	Emails (COB053865)	175
43	BPD P-73 (COB056434)	176
44	Emails (COB421294)	177
45	BPD P-73 (COB054155)	179
46	Email (COB054205)	181
47	Email (COB053811)	182
48	Email (COB054465)	183
49	Emails (COB054224)	185
50	BPD P-73 (COB056155)	189
51	Emails (COB041965)	194
52	Emails (COB047810)	196
53	Emails (COB047813)	198

(*Exhibits 32 and 41 were not marked or introduced.)

1 REPORTED REMOTELY FROM CUYAHOGA COUNTY, OHIO

2
3 THE REPORTER: Good morning. My name is
4 Luanne Howe. I am the stenographic court
5 reporter. I am not physically present with
6 the witness and I will be reporting this
7 deposition remotely.

8 Will the attorneys participating in this
9 deposition acknowledge that, in lieu of an
10 oath administered in person, I will
11 administer the oath remotely and further
12 consent to waive any objections to this
13 manner of reporting?

14 Please indicate your agreement by
15 stating your name, who you represent and your
16 agreement on the record, starting with the
17 noticing attorney.

18 MS. WILNER: Claudia Wilner, National
19 Center for Law and Economic Justice for the
20 plaintiffs, and I consent.

21 MR. POOLE: Chris Poole, Corporation
22 Counsel's Office, City of Buffalo
23 representing municipal defendants, and yes, I

1 consent.

2

3

K E V I N B R I N K W O R T H,

4

having been first duly sworn, was examined

5

and testified as follows:

6

7

EXAMINATION BY MS. WILNER:

8

Q Good morning, Mr. Brinkworth. My name is Claudia

9

Wilner. I'm an attorney with the National Center for

10

Law and Economic Justice, and I represent the

11

plaintiffs in this case.

12

This deposition is being recorded, and the

13

testimony that you provide today could be used in

14

this case and also at trial. Do you understand that?

15

A Yes.

16

Q And do you understand that if I use the abbreviation

17

BPD, I mean the Buffalo Police Department?

18

A Yes.

19

Q And do you understand that you are testifying under

20

oath today?

21

A Yes.

22

Q What does that mean to you?

23

A That means I need to tell the truth subject to --

1 Q Have you ever been deposed before?

2 A Once.

3 Q And was that in connection with your employment with
4 the Buffalo Police Department?

5 A Yes.

6 Q Can you tell me a little bit about that case?

7 A I was accused of kicking a person in the face, but
8 the problem with that was I wasn't even on the scene
9 when that occurred, and I was dismissed out of the
10 suit.

11 Q Okay. And is this your first time participating in a
12 remote deposition?

13 A Yes.

14 Q And are you using a laptop for Zoom today for the
15 deposition?

16 A Yes.

17 Q Do you have any programs other than Zoom open on the
18 laptop right now?

19 A No.

20 Q And other than that device, do you have any other
21 laptops, smartphones, tablets or electronic devices
22 in the room with you?

23 A No.

1 Q I'm going to need you to keep your camera audio and
2 video on while we are on the record. Is that okay?

3 A Yes.

4 Q And is there anybody in the room with you today
5 besides your attorney?

6 A No.

7 Q If anybody else enters the room while we're on the
8 record, please let us know.

9 A Yes.

10 Q The court reporter needs to be able to hear and to
11 transcribe everything that we are saying today, and
12 so for that reason, please wait for me to finish a
13 question before answering, and I will try to wait for
14 you to finish speaking before asking another
15 question, okay?

16 A Okay.

17 Q And please speak clearly and give verbal answers for
18 the court reporter, meaning use "yes" and "no"
19 instead of nodding or shaking your head --

20 A Okay.

21 Q -- okay? Your attorney may object to some of my
22 questions. Unless he directs you not to answer, you
23 must still answer the questions. Do you understand?

1 A Yes.

2 Q Okay. And we can take a break at any time. I'm
3 happy to take breaks if needed, but you will need to
4 answer any pending questions before we go on break.

5 A Okay.

6 Q Do you have any notes or other written documents with
7 you today?

8 A No.

9 Q And do you have any physical or mental health
10 conditions that would prevent you from testifying
11 truthfully or accurately today?

12 A No.

13 Q Is there any other reason why you can't testify
14 truthfully and accurately today?

15 A No.

16 Q Did you review any documents or other materials to
17 prepare for today's deposition?

18 A I had looked at a couple of forms that were produced
19 by the BPD.

20 Q Which forms did you look at?

21 A There was the directive, the Strike Force directive.
22 I looked at a monthly report. I looked at an email,
23 and I looked at a daily report from Strike Force.

1 Q Okay. When you said "the Strike Force directive," is
2 that the checkpoints directive?

3 A Yes.

4 Q And when you say "monthly report," was that a Housing
5 Unit monthly report?

6 A Yes.

7 Q Can you tell me what the email was that you reviewed?

8 A It was from Derenda to the chiefs regarding Strike
9 Force locations that were to be picked by lieutenant
10 over a series of days.

11 Q Okay. And then you said it was a Strike Force daily
12 report?

13 A Yes.

14 Q Okay. And did you meet with your attorney to prepare
15 for today's deposition?

16 A Yes.

17 Q And how many times did you meet?

18 A Just once.

19 Q And was anyone else besides you and your attorney
20 present at those meetings?

21 A Mr. Poole and Mr. Quinn.

22 Q Did you discuss today's deposition with anybody other
23 than your attorneys?

1 A No.

2 Q And have you discussed this lawsuit with anybody
3 other than your attorneys?

4 A No.

5 Q Are you currently employed?

6 A Yes.

7 Q What are you doing for work currently?

8 A I'm an investigator with the Erie County District
9 Attorney's Office.

10 Q And have you held that position since you left the
11 Buffalo Police Department?

12 A I've had it for three years, so I didn't go into it
13 immediately.

14 Q Okay. Did you have other employment in between the
15 Buffalo Police Department and Erie County?

16 A I worked as an attorney, part-time attorney, for a
17 little -- a little attorney work.

18 Q And I'm sorry. Did you say that you worked as an
19 attorney or for an attorney?

20 A As an attorney.

21 Q As an attorney, so you are a licensed attorney?

22 A Yes.

23 Q And prior to your position as an attorney, what did

1 you do before that?

2 A I was with the police department for 30 years.

3 Q Okay. And let me ask, when you were working as an
4 attorney, what kind of cases were you doing?

5 A I did a lot of real estate and wills, trusts.

6 Q Okay. So what was the last position that you held
7 within the Buffalo Police Department?

8 A I was a lieutenant.

9 Q Okay. In any particular district?

10 A A District.

11 Q And let me just ask, because I want to get the
12 chronology down, when did you retire from the Buffalo
13 Police Department?

14 A 2018.

15 Q Okay. And for how long were you a lieutenant in the
16 A District?

17 A Approximately two years.

18 Q Okay. And prior to that, what was your role in the
19 Buffalo Police Department?

20 A I was a chief.

21 Q Okay. And what were you the chief of?

22 A Initially I was chief of Schools, and then I became
23 chief of Schools, Housing and Strike Force.

1 Q Okay. And let's see, how long were you the Schools
2 chief?

3 A A little over nine years.

4 Q And then when did you become the Housing Unit and
5 Strike Force chiefs?

6 A I don't recall when I was named that. I don't recall
7 that.

8 Q Okay. Did you become the Housing Unit and Strike
9 Force chiefs at the same time?

10 A Yes.

11 Q And would that have been around the time that the
12 Strike Force began?

13 A No.

14 Q So there was a Strike Force chief before you?

15 A No, there was no chief at that point.

16 Q Okay. So you were the first Strike Force chief?

17 A Yes.

18 Q Okay. And do you know why they decided to create a
19 position of chief for the Strike Force?

20 A No.

21 MR. POOLE: Object to the form of the
22 question.

23 Q What caused you to leave your position as chief to

1 become a lieutenant in the A District?

2 A I was demoted.

3 Q Okay. And was there a reason for the demotion?

4 A They were going in a different direction.

5 Q And who told you that you were going to be demoted?

6 A Derenda.

7 Q And that was in approximately 2016?

8 A Yes.

9 Q What was the different direction that Derenda wanted
10 to go in at that time?

11 MR. POOLE: Form.

12 A He didn't tell me.

13 Q So the only explanation that you received is that
14 they wanted to go in a different direction?

15 A Yes.

16 Q Did they go in a different direction?

17 MR. POOLE: Form of the question.

18 A They replaced me with someone.

19 Q Other than that, are you aware of any different
20 direction that was taken by the Strike Force and
21 Housing Unit after you left?

22 A No.

23 Q Were there any incidents such as disciplinary

1 incidents that you had prior to the demotion?

2 A No.

3 Q Had you had any differences of opinion with
4 Commissioner Derenda?

5 MR. POOLE: Form.

6 A No. Never verbalized, no.

7 Q Did you have differences of opinion that were not
8 verbalized?

9 MR. POOLE: Form again. You can answer.

10 A I don't know. Maybe -- he and I just didn't get
11 along, I guess, on a professional level.

12 Q Did you get -- have different ideas of how policing
13 should be done?

14 A I just followed orders.

15 Q Did you agree with the orders that you were
16 following?

17 MR. POOLE: Form.

18 A Not always.

19 Q Can you give me some examples of orders that you did
20 not agree with?

21 A Like with the schools, I didn't believe we should
22 make a lot of arrests there and sometimes he would.

23 Q And why didn't you think that you should be making a

1 lot of arrests in the schools?

2 A I think some of them could have been handled through
3 disciplinary action, some of the incidents, and
4 tried -- I don't think you want an armed state in the
5 schools, so I think that's one of them.

6 Q Were you concerned about the impact on the kids of
7 being arrested at a young age?

8 MR. POOLE: Form.

9 A Well, yeah, I mean, because it can have a long-term
10 impact, sure.

11 Q And did Commissioner Derenda want you to make more
12 arrests in the school?

13 A No, he didn't really push for arrests, but I didn't
14 think we needed to make many arrests. A lot of them
15 were just disciplinary issues.

16 Q Did he question your production in terms of the
17 number of arrests in the schools?

18 A No.

19 Q Were there any other issues besides arrests in
20 schools where you and Commissioner Derenda didn't see
21 eye to eye?

22 A No.

23 Q So that was the main area of disagreement?

1 A It was just more personality.

2 Q I'd like you to describe in a little more detail your
3 duties and responsibilities when you were a chief.
4 And perhaps we can start with schools and then you
5 could tell me about Strike Force and then the Housing
6 Unit.

7 A Schools, I was essentially embedded in the school
8 district, and I oversaw the school resource program.
9 And I worked closely with the school security
10 officers and with the administrators and principals.
11 I was a liaison between the department and the school
12 district.

13 I helped to develop some security plans,
14 responsible for responding to incidents in the school
15 or at least my -- the officers, so I was a liaison
16 between the two departments. I worked on different
17 projects with the school district. I would sit on
18 different panels with the school district and some
19 outside agencies.

20 Strike Force, I was the commander. Basically I
21 did a lot of the paperwork or a lot of the paperwork
22 flowed through me. That was about it.

23 With the Housing, I again -- I was the

1 commander. I -- again the paperwork. I went to some
2 meetings with the Executive Board of the Buffalo
3 Municipal Housing Authority, so I was kind of the,
4 again, liaison between the two departments.

5 Q And did your -- and focusing in on the Strike Force
6 and Housing Unit, did your role as commander involve
7 anything other than having paperwork flow through
8 you?

9 A I signed off on a lot of the documents for -- that
10 would have to go downtown. That was at headquarters.
11 But I didn't have any real operational authority.

12 Q And who had the operational authority?

13 A That would come from Derenda.

14 Q So from your point of view, when you were chief of
15 the Strike Force and Housing Unit, Derenda held
16 operational authority?

17 A He -- yeah, he had control and then he had the
18 supervisors.

19 Q And who were the supervisors?

20 A The captains and lieutenants.

21 Q Okay. Did the deputy police commissioners have any
22 operational authority?

23 A Deputy Lockwood oversaw the Housing. He was in my

1 direct line with Housing, so I dealt with him on
2 anything that might arise from Housing.

3 Q So you reported to Lockwood for Housing, but for the
4 Strike Force, you reported directly to Derenda?

5 A Yeah. I don't recall Lockwood being involved in
6 Strike Force all that often.

7 Q What was your position within the BPD prior to being
8 a school chief?

9 A I was a lieutenant.

10 Q In which district?

11 A C District.

12 Q And do you remember the year that you changed from
13 being a C District lieutenant to Schools chief?

14 A 2007.

15 Q And approximately how long were you a lieutenant in
16 the C District?

17 A One year.

18 Q And prior to that?

19 A I was a lieutenant in D District.

20 Q Okay. And how long did you hold that position?

21 A Two years.

22 Q Okay. And before that?

23 A I was a patrol officer in B District.

1 Q And how long was that?

2 A Two years approximately, about two years.

3 Q Okay. And before that?

4 A I was a detective in the Special Frauds Division.

5 Q And how long was that?

6 A A year.

7 Q And what caused you to go from detective to patrol
8 officer?

9 A There was -- they got a budget crunch and several of
10 us were reverted back to that position.

11 Q Prior to being detective, were you a patrol officer?

12 A Yes.

13 Q And what district were you in?

14 A B District.

15 Q Okay. And how long did you hold that position?

16 A Thirteen years approximately.

17 Q And was that your first position within the BPD?

18 A Initially I was in B District -- Precinct 3. And
19 then they went to the district system, so it was
20 subsumed into B District, so it was the same place.

21 Q Okay. Now, when you were working as a lieutenant in
22 the A District, did you and officers under your
23 command respond to traffic accidents?

1 A Yes.

2 Q Did you respond to DUIs?

3 A Yes.

4 Q Were you aware of drug trafficking that was occurring
5 in the A District?

6 A Yes.

7 Q And were you aware of illegal weapons possession that
8 occurred in the A District?

9 A There were -- I can't say with any certainty
10 regarding guns.

11 Q And what about gang activity in the A District?

12 A Yes.

13 Q When you were chief, how much of your time was spent
14 on the Schools versus the Strike Force and the
15 Housing Unit?

16 A I would say probably 95 percent.

17 Q 95 percent was?

18 A With the Schools. That was my primary focus.

19 MS. WILNER: And I just want to look at
20 a quick exhibit to test this out. I hope
21 that it works. And I'm -- can we go off the
22 record for a second?

23 (Discussion held off the record.)

1 MS. WILNER: Back on the record.

2 BY MS. WILNER:

3 Q So I will introduce as Brinkworth 1 a document, and
4 this is -- I had hoped that it would have a Bates
5 number on it, but it doesn't. But this is a Buffalo
6 Police Department Organizational Chart, and this is
7 taken from the Manual of Procedures that was produced
8 to us in this case. And it's page 41 of the Manual
9 of Procedures.

10 And Mr. Brinkworth, is this a document that you
11 recognize? Have you seen it before?

12 A Yes.

13 Q Okay. And --

14 MR. POOLE: Ms. Wilner, I apologize for
15 interrupting. It is just very small on our
16 screen, so forgive us if it takes a minute or
17 two to --

18 MS. WILNER: Yeah, that's fine. And
19 we've had these issues, so I'm happy to zoom
20 in and scroll if needed. Can you see it
21 better now?

22 MR. POOLE: That does help. Thank you
23 very much.

1 Q Okay. And I just wanted to clarify because in
2 this --

3 MR. POOLE: Just Mr. Brinkworth informs
4 me that he did not bring his glasses today,
5 so extra patience with us.

6 MS. WILNER: Sure, no problem. I don't
7 have great eyes myself, so I understand and
8 we can just blow everything up as large as
9 you need.

10 Q So turning to Exhibit 1, I just wanted to clarify the
11 chain of command because this organizational chart
12 shows the school chief reporting to the first deputy
13 commissioner for administration.

14 A Yes.

15 Q Is that -- was that the structure of command that was
16 in practice when you were there?

17 A I reported to Lockwood, yes.

18 Q Okay. And Lockwood was the deputy commissioner for
19 administration?

20 A Yes.

21 Q Okay. It wasn't Kimberly Beaty?

22 A I reported to Lockwood.

23 Q Okay. That's helpful. Thank you.

1 And just to clarify, you -- because before you
2 had said that on the Strike Force you reported to
3 Derenda, but was that going through Lockwood for all
4 purposes?

5 A I did go through Lockwood, yeah.

6 Q Okay. And did you produce weekly reports as chief?

7 A No. I did not personally file them, no.

8 Q And did you -- so how did you report to Lockwood or
9 to the commissioner?

10 A The officers -- the school officers would have to
11 file reports each day and they would go to Lockwood.
12 And then Strike Force, they would file, and Housing
13 would file. And I would file a monthly report to the
14 deputy mayor of the city sometimes, not necessarily
15 monthly, but sporadically.

16 Q So you filed reports with the city administration --

17 A Yes.

18 Q -- that were not going through the BPD chain of
19 command?

20 A No, no, I would file it with the deputy mayor. Or I
21 don't recall filing reports with Lockwood.

22 Q Were those reports pertaining to the schools?

23 A Yes.

1 Q Did they include your work with the Strike Force and
2 the Housing Unit?

3 A No.

4 Q And can you describe the command structure through
5 which you supervised the Housing Unit and the Strike
6 Force?

7 A There was a captain, two lieutenants, and there were
8 two separate platoons too.

9 Q Okay. And was that for the Housing Unit?

10 A That was for Housing and Strike Force.

11 Q Okay. The captain was over both -- was the captain
12 of both units?

13 A Initially I -- initially, I'm not certain. I'm not
14 certain if there was a captain in Housing initially.
15 There was one in Strike Force.

16 Q And it would have been the same individual?

17 A There was one captain assigned to that precinct, if
18 you will, to that station house.

19 Q Okay. And then there were also in the Housing Unit
20 and the Strike Force lieutenants who were underneath
21 the captain?

22 A Yes.

23 Q And then officers who were underneath the

1 lieutenants?

2 A Yes.

3 Q And in your role as chief, did you communicate
4 directly with officers or with lieutenants, or did
5 your communications flow through the captain?

6 MR. POOLE: Form. Do you want to break
7 down the compound question, please?

8 Q Okay. In your role as chief of the Strike Force, did
9 you communicate directly with the officers?

10 A No.

11 Q And in your role as chief of the Strike Force and
12 Housing Unit, did you communicate directly with the
13 lieutenants?

14 A Generally, no.

15 Q And was it the case that your principal communication
16 was through the captain?

17 A Yes.

18 Q Where was your office physically located?

19 A I had -- at various times I had three. I had one in
20 city hall. Then we moved into -- it's called School
21 40, and then I moved over to another school, School
22 425 -- no, School 4, so my offices were with the
23 school district.

1 Q And so you were not in the same physical location as
2 the Strike Force and Housing Unit --

3 A No.

4 Q -- officers? How often did you meet in person with
5 the Strike Force and Housing Unit captain?

6 A Maybe once every other week.

7 Q And did you meet in person with the Strike Force and
8 Housing Unit lieutenants?

9 A If I was over in the station, I would see the
10 lieutenants.

11 Q And by "the station," do you mean the building at 312
12 Perry?

13 A Yes.

14 Q And how often did you personally visit the station at
15 312 Perry?

16 A Maybe once every other week. It would depend because
17 sometimes I would get a call to come over and sign
18 documents, and I would come in during the day and
19 sign them before their shift started.

20 Q Did you visit -- scratch that.

21 When you were visiting the station at 312 Perry
22 Street, did you observe roll call meetings?

23 A No.

1 Q Did you personally go out into the field to observe
2 the officers and lieutenants at work?

3 A A handful of times.

4 Q And were those for specific reasons or just in the
5 course of your duties as chief?

6 A Just to see what they were doing.

7 Q And what did you observe?

8 A I would observe them -- I would sometimes go out with
9 the captain and drive with the captain and just
10 respond to calls if something came up.

11 Q How much of your supervision of the Strike Force and
12 Housing Unit was done by email versus telephone or
13 in-person communication?

14 A Mostly in person or through telephone calls.

15 Q And you received daily reports from the Housing Unit
16 captain?

17 A No.

18 Q You received monthly reports from the Housing Unit?

19 A I would receive the compilation of the statistics.

20 Q I see. And what about for the Strike Force, what did
21 you receive?

22 A Same. I would just -- I would receive a compilation
23 of the monthly statistics.

1 Q And how did you receive those?

2 A By email for the Housing, but for the Strike Force, I
3 would have to call the deputy commissioner's office.

4 Q And then how would you get them from the deputy
5 commissioner's office?

6 A I believe they were emailed to me.

7 Q And did those reports include a narrative?

8 A I know the Housing reports would. They would include
9 a breakdown of events that may have happened over the
10 course of that reporting period. Strike Force, I
11 don't recall if there were narratives.

12 Q And what did you do with the reports when you
13 received them?

14 MR. POOLE: Form.

15 A Filed them. I would put them in a manila file.

16 Q Did you read them?

17 A I would scan them.

18 Q Did you discuss them with anybody else?

19 A Not as a practice, no.

20 Q Tell me, what was the BPD Strike Force?

21 A A squad of about 40 people who -- 40 officers who
22 were assigned to work some of the higher crime areas
23 in the city, kind of create a presence in those

1 neighborhoods to hopefully quell some of the crime.

2 Q And why did the BPD create the Strike Force?

3 MR. POOLE: Form.

4 A I don't know.

5 Q How did you come to have the position of Housing Unit
6 and Strike Force chief?

7 A One day I was called by Derenda, and he said, "You're
8 going to be the chief of Strike Force and Housing,"
9 and that was it.

10 Q Did you want to be the chief of Strike Force and
11 Housing?

12 A I did not ask for it, no.

13 Q Did you have any personal role in the creation of the
14 Strike Force?

15 A None.

16 Q And what was the main mission of the Strike Force?

17 A To help to reduce crime in some of the neighborhoods
18 or all of the neighborhoods.

19 Q Did the Strike Force seek to control gang violence?

20 A Their mission was to hopefully stop some of the gang
21 violence, sure.

22 Q How much of the Strike Force's efforts were
23 specifically directed at gang enforcement?

1 A I don't know.

2 Q Did the Strike Force officers receive specific
3 training on gang activity?

4 A I don't know.

5 Q When you were a chief, did you view traffic
6 enforcement as an effective tool for curbing gang
7 violence?

8 A I don't know that it was effective, no.

9 Q How did Strike Force officers identify potential gang
10 members?

11 MR. POOLE: Form.

12 A I don't know how the individual officers identified
13 them.

14 Q Did the Buffalo Police Department have a certain
15 profile of people who were more likely to be involved
16 in gang activity?

17 MR. POOLE: Form.

18 A Not that I'm aware of.

19 Q And I will introduce as Brinkworth 2 a document
20 that's been labeled COB039344. And this is an email
21 that Joseph Gramaglia sent to you along with others
22 in the Buffalo Police Department on June 11, 2015.

23 A Okay.

1 Q Are you able to see this okay, or do you need it a
2 little bigger?

3 A No, it's good.

4 Q Okay. So in this email, Gramaglia is passing along a
5 request by federal authorities for help building a
6 case up against the Central Park Gang. If we scroll
7 down to the bottom email in the chain, the federal
8 authorities asked the Strike Force to document all
9 vehicle stops with regard to vehicle location, date,
10 time and occupants where they suspect gang members
11 are involved. Was --

12 MR. POOLE: Ms. Wilner, can we just take
13 one second to read through, please?

14 MS. WILNER: Of course. Let me know
15 when you're ready.

16 MR. POOLE: It's just I'm squinting to
17 read, so I apologize.

18 MS. WILNER: Okay. I can make it a
19 little bigger.

20 MR. POOLE: I've just got to go off --
21 is there a pending question?

22 MS. WILNER: I would say yes.

23 MR. POOLE: Okay. All right. Okay.

1 Q So was this type of activity typical for the Strike
2 Force?

3 A Not that I'm aware of.

4 Q And setting aside cooperating with federal
5 authorities, was the general activity of documenting
6 traffic stops where they suspect gang members are
7 involved an activity that the Strike Force regularly
8 engaged in?

9 A The Strike Force made stops, yes, and I believe they
10 did document those stops if there were summonses
11 issued.

12 Q How would the Strike Force officers choose which
13 vehicles to stop?

14 MR. POOLE: Form.

15 A I don't know.

16 Q And I'm going to introduce as Derenda 3 -- sorry --
17 Brinkworth 3 an email. It's labeled COB039337.

18 A Can you bring it down? I can't read it.

19 Q Yes. So this is an email that you sent to -- those
20 would be the Strike Force lieutenants, correct --

21 A Yes.

22 Q -- on April 22, 2015? And it has to do with
23 interviewing suspects at the station house.

1 A Okay.

2 Q And it says per DPC Lockwood, summarizing, the
3 officers can bring people to interview to the
4 headquarters only, not to the Strike Force offices.

5 A Yes.

6 Q Can you explain the circumstances that led to this
7 directive?

8 A I don't know. It came from Lockwood. I don't know.

9 Q Was there a particular incident that caused Lockwood
10 to issue this directive?

11 MR. POOLE: Form.

12 A I don't know.

13 Q And I'm going to introduce as Brinkworth 4 a document
14 that says at the top "Strike Force Mission." And if
15 we scroll down, it's been identified as COB060319.
16 I'll scroll up so that you can see it. Is this a
17 document that you have seen before?

18 A I don't recall seeing that, no.

19 Q From your experience as chief, does this document
20 accurately describe the mission of the Strike Force?

21 MR. POOLE: Form. Can we have an
22 opportunity to review the entire document?

23 MS. WILNER: Yes, although I'm

1 specifically speaking about this part at the
2 top that says "Strike Force Mission."

3 MR. POOLE: Numbered 1 through 4?

4 MS. WILNER: Yeah. But this is -- feel
5 free to read through it.

6 MR. POOLE: I apologize for interrupting
7 the question.

8 MS. WILNER: That's okay.

9 Q Are you finished reading?

10 A Yeah.

11 Q Okay.

12 A At least the top part of it appears to be the
13 mission. I'm not certain about the bottom part.

14 Q Okay. Do you notice that part of the Strike Force
15 mission according to this document is strict
16 enforcement of the mayor's zero tolerance crime
17 policy?

18 A I do see that.

19 Q What was the zero tolerance crime policy?

20 A I don't know.

21 Q Did you understand your role as chief as in part to
22 ensure strict enforcement of the zero tolerance crime
23 policy?

1 A My role as chief was limited.

2 Q Looking at the bullet points, about halfway down the
3 list, it says, "Strike Force will perform daily
4 Traffic interdictions."

5 A Yes.

6 Q What does "interdictions" mean?

7 A It means making -- essentially making contact with
8 people.

9 Q And how did performing traffic interdictions help the
10 Strike Force to fulfill its mission?

11 A Well, they would set up the roadblocks, and
12 hopefully, they would run the traffic corners and
13 check cars as they went through. Occasionally, they
14 would write a summons.

15 And sometimes from the information they got from
16 the licenses, they might be able to make a warrant
17 arrest. You know, there might be some outstanding
18 warrants out there for people.

19 Q And so how did running the roadblocks in particular
20 help the Strike Force to fulfill its mission?

21 A By sometimes making arrests that resulted from the
22 traffic stops.

23 Q Moving a little further down in the document, it

1 says, "Chiefs will develop a weekly list of top five
2 district Hotspots to be targeted by the Strike Force.
3 ECAC will develop analysis based on target areas."
4 Were you responsible for developing hotspot lists for
5 the Strike Force to target?

6 A No.

7 Q In your role as chief, did you work directly with the
8 ECAC?

9 A I did when -- I did with Schools.

10 Q For the record, what is ECAC?

11 A That's the Erie County Analysis Center.

12 Q So you work with them for Schools but not for the
13 Strike Force and Housing Unit?

14 A Right.

15 Q I will introduce as Brinkworth 5 a series of maps.
16 There are 24 pages to this document. The first page
17 is labeled COB001613. The top is labeled "Strike
18 Force - Target Area 1."

19 If we scroll to page 2, we see "Strike Force -
20 Target Area 2." I'm not going to be asking specific
21 questions about the maps, so I'll just represent that
22 this document contains 24 maps for the 24 Strike
23 Force target areas.

1 And my question for you, Mr. Brinkworth, was
2 whether you're familiar with these maps.

3 A I have seen them, yes.

4 Q Were these maps that you worked with regularly in
5 your role as chief?

6 A No.

7 Q Were you personally involved in directing Strike
8 Force patrol locations?

9 A No.

10 Q Do you know what went into setting Strike Force
11 patrol locations?

12 A I don't.

13 Q Were you aware on a daily basis of where the Strike
14 Force was patrolling?

15 A No.

16 Q Were you aware that the Strike Force patrolled mostly
17 in Black neighborhoods on the east side of Buffalo?

18 A I knew there was a concentration on the east side,
19 yes.

20 Q And how did you know that there was a concentration
21 on the east side?

22 A I would receive reports at the end -- maybe I was
23 told they were there. I'm not certain, but I knew

1 that there was a concentration.

2 Q Would you say that it was common knowledge within the
3 BPD that the Strike Force was concentrated on the
4 east side of Buffalo?

5 MR. POOLE: Form.

6 A Yes.

7 Q Was that something that concerned you?

8 A No, because there was some high crime areas.

9 Q Are you familiar with COMPSTAT?

10 A Yes.

11 Q What was COMPSTAT?

12 A It was a monthly reporting. We would meet monthly;
13 all the chiefs and division heads would meet monthly.
14 It was kind of an information sharing process to talk
15 about trends that might be happening in districts or
16 throughout the city.

17 Q You would typically attend COMPSTAT meetings?

18 A Yes.

19 Q Along with the other chiefs?

20 A Yes.

21 Q Did anybody below the level of chief attend COMPSTAT
22 meetings?

23 A There would be captains there. There would be

1 inspectors, detectives.

2 Q Did the Housing Unit or Strike Force captain attend
3 COMPSTAT meetings?

4 A Not that I recall.

5 Q And how about the deputy police commissioners, did
6 they attend?

7 A Deputy Commissioner Lockwood was in charge of
8 COMPSTAT.

9 Q Did Commissioner Derenda attend COMPSTAT meetings?

10 A Generally, no.

11 Q Can you describe a typical COMPSTAT meeting?

12 A There would be about 20, 25, 30 people in the room.
13 Deputy Commissioner Lockwood would lead it. He might
14 talk about some current issues, and then he would
15 call on either district chiefs or the heads of some
16 of the divisions to kind of give an update on what's
17 happening in their respective division or district.

18 Q And how did you use that information that you
19 received at COMPSTAT meetings in your work?

20 A I don't recall using it to be honest with you. I
21 think I filed it away.

22 Q Do you know if information from COMPSTAT meetings
23 went into setting Strike Force and Housing Unit

1 patrol locations?

2 A I don't.

3 Q I'll introduce as Brinkworth 6 a document that's been
4 identified as COB328444, and on the cover it says,
5 "Buffalo COMPSTAT Meeting, July 22, 2015 (Crime
6 Period 6)." Are you able to --

7 A Yes.

8 Q -- see it? Okay. Are you familiar with this type of
9 document?

10 A Yes.

11 Q Does this document have a name?

12 A Just Buffalo COMPSTAT Meeting, and it refers to the
13 period.

14 Q Okay.

15 A "Crime and Notable Patterns."

16 Q Okay. Would you call it like a COMPSTAT report or --

17 A Yeah. I would say it was, yeah, whatever was given
18 to whomever created that probably put into it.

19 Q And did ECAC produce this document?

20 A I don't know. I'm not sure.

21 Q Okay. So looking at page 2, there's an agenda here,
22 and would you say that this is a typical agenda for a
23 COMPSTAT report?

1 A Yes.

2 Q Would you agree that though the contents of the
3 document like this might vary from time to time,
4 generally, you would expect to see citywide crime
5 statistics in maps, district crime statistics in maps
6 and other information from ECAC?

7 A Yes.

8 Q And just to save time from -- a little time, I'll say
9 that I've looked through a number of these reports
10 that have been produced. I've seen information about
11 homicides, shooting victims, gang member
12 identification, social media reports. Do all of
13 those sound familiar to you?

14 A Yes.

15 Q Have I left out anything else important that you
16 would expect to see in a COMPSTAT report?

17 A Not that I can think of.

18 Q So we are just going to scroll through. I'm
19 not asking -- I'll stop at pages where I'm going to
20 ask specific questions. And the first one is here.
21 This is a map. The heading is "Citywide NARC CSF
22 Density." What does NARC CFS stand for?

23 A I'm not certain. I believe NARC is narcotics. I'm

1 not sure what CFS is. Calls for service possibly.

2 Q Okay. Thank you. And then the bright green, yellow
3 and orange dots, are those known as hotspots?

4 A Yes.

5 Q And would you agree that the hotspots that are shown
6 on this map are distributed around the city of
7 Buffalo?

8 A Yes.

9 Q Turning to page 7, the map is labeled "Citywide
10 Property Crime Density." Can you define "property
11 crimes"?

12 A Any crime that does not include a person, something
13 is -- burglary, maybe a car theft, car popping, those
14 types of things.

15 Q And would you agree that the hotspots shown on this
16 property crime map are distributed around the city of
17 Buffalo?

18 MR. POOLE: Form.

19 A Yes.

20 Q Looking to page 8 of the report, the heading is
21 "COMPSTAT 2015 Citywide Violent Crime Density." Can
22 you define violent crimes?

23 A That would be something that relates to a severe

1 injury or physical injury to a person.

2 Q And looking at that map, this map, and noting that
3 there are fewer hotspots in South Buffalo, which is
4 also the A District, but aside from that, still the
5 hotspots are distributed around the city of Buffalo.
6 Would you agree?

7 MR. POOLE: Form.

8 A No, because North Buffalo is not represented all that
9 heavily with violent crime.

10 Q And by "North Buffalo," do you mean -- so the blue
11 section of the map on the top that is the D District,
12 correct?

13 A That's -- yeah, that's the eastern end of D District,
14 northeast end of D District.

15 Q Okay. And I'm going to turn to page 22 of the
16 report. And here we have the social media report.
17 And much of the information on this page is redacted.

18 A Okay. I can't read that.

19 Q Well, you certainly can't read the part that I
20 covered with a black square but --

21 A I get that. It's the size of it.

22 Q Here's a summary. Is that -- can you see that now?

23 A Yes.

1 Q And so this is a report that's purporting to provide
2 information that's related to gang activity, right?

3 A Yes.

4 Q Can you tell me what normally would be contained in
5 the social media report?

6 A You might have pictures of people flashing guns,
7 money, maybe large gatherings, parties, that type of
8 thing.

9 Q And based on your experience of having viewed
10 documents of this type in their unredacted form, what
11 would you expect the race or the apparent race of the
12 people shown in the photos to be?

13 MR. POOLE: Form.

14 A Oftentimes, they were Black.

15 Q And their gender?

16 A Males.

17 Q And their approximate age?

18 A That could vary.

19 Q Would this document be the only document that was
20 reviewed at a COMPSTAT meeting, or would there be
21 other documents or materials that you would also
22 review?

23 MR. POOLE: Form.

1 A That was the primary one. I don't know if maybe some
2 of the squads would have brought something, but that
3 was the primary document.

4 Q Did COMPSTAT meetings have any portion of them that
5 was devoted to traffic safety issues?

6 A Not that I recall.

7 Q And did you ever pass on information that you
8 received from COMPSTAT meetings to the Strike Force
9 and Housing Unit captains for them to use in their
10 policing?

11 A I don't recall specifically doing it. I probably
12 have, but I don't recall specifically.

13 Q What was the mission of the BPD Housing Unit?

14 A They were essentially to create a presence in some of
15 the housing sites, police presence.

16 Q And they were a service that was contracted between
17 the City of Buffalo and the Buffalo Municipal Housing
18 Authority, correct?

19 A Yes.

20 Q Are you familiar with or have you reviewed the
21 contract?

22 A No.

23 Q Have you ever seen it?

1 A I have seen it.

2 Q Have you read it?

3 A I don't recall. If I did, it was years ago.

4 Q Have you heard that the Housing Unit was contracted
5 to provide above baseline services to the Housing --

6 A Yes.

7 Q Can you explain what "above baseline" means?

8 A Baseline would be regular patrol services.

9 Baseline -- above baseline would be essentially a
10 detail, the way I understand it, the detail in the
11 specific areas. So you're specifically detailed --
12 rather than generalized patrol in an area, that's
13 your specific detail to those sites.

14 Q Would you agree that the primary mission of the
15 Housing Unit was drug interdiction and preventing
16 crime within the MHA housing?

17 MR. POOLE: Form.

18 A I would say create a presence and to hopefully
19 prevent crime, yeah.

20 Q Was another primary mission to communicate with
21 residents and respond to resident calls for service?

22 A Resident groups would provide information, or if they
23 had issues or complaints, they would direct them to

1 the Housing Squad.

2 Q The Housing Unit performed a substantial amount of
3 vehicle traffic enforcement near BMHA properties,
4 correct?

5 A Yes.

6 Q Did you consider V&T -- and by V&T, I mean vehicle
7 and traffic. Did you consider V&T enforcement near
8 Housing Authority buildings to be above and beyond
9 baseline services?

10 A Not necessarily because patrol officers would make
11 those stops anyway.

12 Q Did you consider writing parking tags to be part of
13 providing above baseline services to the Housing
14 Authority?

15 MR. POOLE: Form.

16 A Again, an officer would write parking tickets in the
17 normal course of his duties.

18 Q Do you consider impounding vehicles to be part of
19 providing above baseline services to the Housing
20 Authority?

21 MR. POOLE: Form.

22 A Yes. If there's a reason to tow it, then again it
23 would be part of an officer's duties.

1 Q Does writing traffic violations further the mission
2 of preventing criminal activity within the MHA
3 buildings?

4 A Well, if you make a car stop and you're creating a
5 presence out there, people are seeing you, but you're
6 also making these stops. And again, if there's
7 somebody with a warrant in there, you make a
8 presence, you make your presence, and maybe people
9 avoid the area. Maybe the bad guys avoid the area.

10 Q How about actually issuing the tickets as opposed to
11 just making the stop, does actually issuing the
12 tickets assist with the law enforcement mission?

13 A Sure, yes.

14 Q And can you explain why?

15 A Well, you're enforcing the vehicle and traffic law,
16 which is law enforcement.

17 Q And how about impounding vehicles, does that further
18 the goal of preventing criminal activity in and
19 around Housing Authority buildings?

20 A Well, it can also be a safety issue. But again,
21 they're enforcing vehicle and traffic laws. If
22 you're taking those vehicles off, the person's not --
23 if the car is not registered, he shouldn't be

1 driving.

2 Q And how does that relate to the specific issue of
3 violence and crime within the buildings?

4 A Well, you also have the grounds too. You had a lot
5 of people out and about. You know, you're in the
6 area of the housing site. You've got cars in and out
7 of the housing areas, so you're enforcing the laws
8 within close proximity on the streets located within
9 there and surrounding.

10 Q And how about issuing parking tags, does that relate
11 to the mission of reducing crime around the Housing
12 Authority buildings?

13 A It can. I don't know if it specifically reduced
14 crime.

15 Q So what would be the reason that the Housing Unit
16 issued parking tags as part of its duties?

17 A If they're parked illegally, they might be blocking
18 the entrances to the buildings, might be blocking
19 entrances to the actual sites.

20 Q When you were a chief, to your knowledge, did the BPD
21 ever perform any kind of assessment to determine
22 whether V&T enforcement was actually resulting in
23 crime deterrents within BMHA buildings?

1 MR. POOLE: Form.

2 A I don't know.

3 Q You're not aware of any --

4 A Not that I'm aware of, no.

5 Q The BMHA buildings and parking lots are private
6 property, right?

7 MR. POOLE: Form.

8 A That I'm not sure of. That I'm not sure of. I don't
9 know if the city owned them.

10 Q Did the BPD have legal authority to issue parking
11 tags on private property?

12 MR. POOLE: Form.

13 A They -- I'm not sure if that's public property or
14 private property. I don't know.

15 Q Okay.

16 A But --

17 Q I think my question was -- and I'm not now asking you
18 to opine on what the legal status of the BMHA
19 buildings is, but does the BPD have the legal
20 authority to issue parking tags on private property?

21 A In the past, if the owner of the property granted
22 them permission, yes, they could. They could issue
23 tickets.

1 Q And what if the owner did not grant permission?

2 A Then they weren't issued.

3 MR. POOLE: Can we take just a
4 five-minute break to get a couple cups of
5 water and stretch our legs?

6 MS. WILNER: Sure, no problem. That's
7 fine. We will go off the record.

8 (A recess was taken.)

9 BY MS. WILNER:

10 Q So I'm going to introduce as Brinkworth 7 an email.
11 It's identified as COB041842, and this is an email
12 that William Macy sent to you as well as Philip
13 Serafini. Serafini would have been the Housing Unit
14 captain at this time, correct?

15 A Yes.

16 Q I'll give you a minute to read the email. Let me
17 know when you're ready.

18 A Okay.

19 Q Who was William Macy?

20 A He's an officer. He was the community officer for
21 the Housing Squad.

22 Q And in this email, he is reporting that a parking
23 enforcement judge had ruled that the BPD could not

1 write tickets on BMHA property because it is private
2 property, correct?

3 A Yes.

4 Q Were you ever concerned that BPD's parking
5 enforcement on BMHA property might be unlawful?

6 MR. POOLE: Form.

7 A No, I didn't know the status.

8 Q When you received this email that was bringing to
9 your attention the fact that it's private property,
10 that didn't raise a concern for you?

11 A I don't recall this.

12 Q Was it an issue that you ever discussed with Lockwood
13 or Derenda?

14 A I don't recall.

15 Q And what is the law enforcement benefit of ticketing
16 parked cars on BMHA property?

17 MR. POOLE: That's been asked and
18 answered.

19 A The benefit is you're enforcing the parking
20 enforcement laws. Hopefully, that will prevent
21 others from doing that.

22 Q Is there any benefit other than enforcing parking
23 laws?

1 MR. POOLE: Form.

2 A If the car is there by itself, I guess to enforce the
3 parking laws.

4 Q Did you personally ever provide any guidance to
5 Housing Unit officers about when it is and is not
6 appropriate to ticket on BMHA property?

7 A Not that I recall.

8 Q And did you personally ever request that any other
9 person provide additional guidance to Housing Unit
10 officers with respect to ticketing within BMHA
11 parking lots?

12 A Not that I recall.

13 Q Now, one of the tools that the Strike Force used to
14 achieve its mission was traffic checkpoints, correct?

15 A Yes.

16 Q And the checkpoints were located in crime hotspots?

17 MR. POOLE: Form.

18 A Yes.

19 Q And would you agree that a primary purpose of the
20 checkpoints was to deter crime?

21 A They were designed for traffic control.

22 Q And what is traffic control? What do you mean by
23 traffic control?

1 A They were to enforce some of the traffic laws. The
2 stops, they would check the registrations, the
3 inspections, maybe tints, seat belts.

4 Q Another primary purpose of the checkpoints was to
5 demonstrate high visibility?

6 A Yes.

7 MR. POOLE: Form. I'm not sure that was
8 a question.

9 Q Was another primary purpose of the checkpoints to
10 remove drugs and guns from the street if the officer
11 developed probable cause to search a vehicle that was
12 stopped at a checkpoint?

13 MR. POOLE: Form.

14 A It did happen. I don't know if that was necessarily
15 the primary goal though.

16 Q I will introduce as Brinkworth 8 an email that's been
17 identified as COB591045.

18 A Okay.

19 Q And can you see that okay, or would you like it a
20 little larger?

21 A Maybe a little larger.

22 Q How's that?

23 A Yeah.

1 Q So this is an email that you sent to Commissioner
2 Derenda on December 12, 2012?

3 A I guess, yes.

4 Q And the text of the email says, "Roadblock at Bailey
5 and Berkshire tonight. In response to recent
6 homicides"?

7 A Yes.

8 Q Why did you choose to run a roadblock in response to
9 recent homicides?

10 MR. POOLE: Form.

11 A I don't recall.

12 Q In what way would a roadblock address recent
13 homicides?

14 A It might be a presence, police presence in the area.

15 Q The vast majority of people passing through the
16 roadblock would have nothing to do with the
17 homicides, right?

18 MR. POOLE: Form.

19 A Yes.

20 Q It could be that not a single person passing through
21 the roadblock would have been involved in a homicide,
22 correct?

23 MR. POOLE: Form, as we're speculating.

1 A Yes.

2 Q Did you think it was appropriate to subject those
3 citizens to suspicionless stops as a response to
4 recent homicides?

5 A I'm not sure. Could you repeat that, please?

6 MS. WILNER: Actually, could I ask you
7 to read back the question?

8 (Record read by reporter.)

9 A I don't think the intent was to cause anybody any
10 issues with that. It was created -- I don't know why
11 it was there. I don't know why it was there.

12 Q But you said that the roadblock would be run there in
13 response to homicides. Wasn't that a decision that
14 you made?

15 MR. POOLE: Form.

16 A I don't necessarily know that I made that. I might
17 have been told that. I had very little input into
18 the actual locations.

19 Q Do you believe that the Fourth Amendment permits the
20 BPD to subject ordinary citizens of Buffalo to
21 suspicionless stops in response to recent homicides?

22 MR. POOLE: Form. It's a legal
23 conclusion.

1 Q Go ahead and answer the question, please.

2 A Do I -- can you repeat, please?

3 MS. WILNER: Could you read back the
4 question, please?

5 (Record read by reporter.)

6 A I don't believe the Fourth Amendment allows for that,
7 no.

8 MS. WILNER: And just to clarify for the
9 record, the term is "suspicionless," not
10 "suspiciousless."

11 Q Did you ever receive training from the BPD about
12 Fourth Amendment requirements for vehicle stops?

13 A I don't recall.

14 Q Did you personally provide training or guidance to
15 your subordinates about Fourth Amendment requirements
16 for vehicle stops?

17 A No.

18 Q Did you ever ask that they receive such training?

19 A I don't recall.

20 Q Your email doesn't mention anything about a traffic
21 safety objective for this particular roadblock, does
22 it?

23 A No.

1 Q I will introduce as Brinkworth 9 an email chain
2 between Patrick Roberts, Commissioner Derenda, and
3 you were involved further down in the chain. The
4 document is identified as COB039610. And I'm going
5 to start with the email at the bottom of the chain.
6 I'll blow it up a little bit. Is it true that
7 Patrick Roberts was the captain of the Housing Unit
8 and Strike Force at this time?

9 A Yeah, he was the captain of the Strike Force.

10 Q And the email is dated May 28, 2014, and it's titled
11 "Plan for Enforcement." Go ahead and read it and let
12 me know when you're ready for the next page.

13 A Okay. Okay.

14 Q So in this email, Captain Roberts is referencing
15 several acts of recent violence, and he says that he
16 wants to get out in front of increased instances of
17 violent crimes as the weather warms, right?

18 A Yes.

19 Q And he's requesting a Strike Force overtime detail.
20 He says "we would be able to show a strong, visible
21 presence in selected areas where some of the more
22 violent crimes have occurred. I would be willing to
23 speak with the District Chiefs to see where we could

1 be most useful, and use that as a guide as to where
2 to conduct multiple checkpoints as well as an overall
3 saturation of the effected areas."

4 So what would be the purpose of conducting
5 multiple checkpoints?

6 A Again, presence in the area, to see that Strike Force
7 is out in the area.

8 Q Isn't it specifically to address violent crime?

9 A That -- yeah, that seems to be the purpose from this.

10 Q And the locations are going to be based on law
11 enforcement information provided by district chiefs,
12 right?

13 A Some of it, yes.

14 Q And it's part of an overall proactive policing
15 strategy?

16 A Yes.

17 Q Looking up to the email from the commissioner, he
18 approved this plan, right?

19 A Yes.

20 Q And Captain Roberts didn't mention anything about
21 traffic safety in this email, did he?

22 A It appears not.

23 Q I'll introduce as Brinkworth 10 a document that says

1 at the top "Buffalo Police Department Roadblock
2 Directive," and the identification is COB060320. Is
3 this an example of the Roadblock Directives that were
4 routinely used at Strike Force checkpoints?

5 A Yes.

6 Q And these directives were supposed to be issued for
7 every checkpoint, correct?

8 A Yes.

9 Q Did you as chief ever take any steps to check to see
10 whether officers were, in fact, issuing Roadblock
11 Directives for every roadblock?

12 A I believe these were to be hand -- could you move
13 that up a little bit, please?

14 Q Yes. This way, you mean? (Indicating.)

15 A Yeah. They were all -- the directive was supposed to
16 be given to the officers.

17 Q And do you know whether it was given to the officers?

18 A I don't know if it was on a daily basis, no.

19 Q You never checked to see that it was?

20 MR. POOLE: Form.

21 A Not that I recall.

22 Q It's possible that officers could have run roadblocks
23 without directives and you would not have known about

1 it?

2 MR. POOLE: Form.

3 A Correct.

4 Q The Housing Unit also ran checkpoints, correct?

5 A Yes.

6 Q And for the record, I'll just clarify that I'm using
7 "checkpoint" and "roadblock" to mean the same thing.

8 The Housing Unit ran checkpoints sometimes along
9 with the Strike Force?

10 A Yes.

11 Q And sometimes did it run checkpoints on its own
12 without the Strike Force?

13 A I believe it did.

14 Q When the Housing Unit ran checkpoints, was that for
15 the primary purpose of preventing crime around BMHA
16 property?

17 A It again was for traffic control and to create a
18 presence in the area.

19 Q I will introduce as Brinkworth 11 an email that's
20 identified as COB591230. And I'll make it a little
21 smaller. This is a little big.

22 So it's an email chain between you and Steven
23 Nichols with the BPD?

1 A Okay.

2 Q Who is Steven Nichols?

3 A He is an officer. He was lieutenant, I believe, at
4 that time, possibly captain.

5 Q And was he with a district?

6 A I'm not sure where he was.

7 Q And this series of emails is -- has a subject line
8 "Mayor's Clean Sweep." Take a minute to read it if
9 you need.

10 A Okay.

11 Q What was the Clean Sweep Program?

12 A It was a mayor's program where officers and some of
13 the city workers and others would go into some of the
14 areas and basically clean -- help to clean out --
15 clean the streets and clean up the -- just clean up
16 the area.

17 Q Was it part of the mayor's zero tolerance crime
18 initiative?

19 A I don't know.

20 Q Was the purpose of the clean sweeps to reduce crime?

21 A I don't know.

22 Q In this particular case, the clean sweep team was
23 focusing on the Langfield projects, right?

1 A Yes.

2 Q And they asked for increased police presence. Would
3 that have been the mayor's clean sweep team that
4 wanted the increased police presence?

5 MR. POOLE: Form.

6 A It seems to be.

7 Q And so would it have been the Housing Unit officers
8 who were participating in the sweep?

9 A Yes.

10 Q And so they were approved to set up a checkpoint in
11 conjunction with the sweep. What would be the
12 purpose of running a checkpoint in conjunction with
13 the clean sweep?

14 A I think maybe just to -- I think it might be a
15 presence again, police presence.

16 Q I will introduce as Brinkworth 12 an email that you
17 sent to Kimberly Beaty. The number is COB590997.
18 I'll blow that up a little bit. Take a minute to
19 read it. Let me know when you're done and if you
20 need me to scroll down.

21 A Could you pull it up, please?

22 MR. POOLE: Wait a second. We're being
23 interrupted. Pardon us.

1 I apologize, but I have to take a call
2 from a court very quickly. We're very low
3 staffed right now, so I'll be back in a
4 minute or two. I apologize.

5 MS. WILNER: Okay. We can go off the
6 record.

7 (Discussion held off the record.)

8 BY MS. WILNER:

9 Q So I believe we're on Brinkworth 12, and it's an
10 email exchange between you and Kimberly Beaty. Was
11 she the DPC for administration at this time?

12 A I'm not sure which position she was in.

13 Q Okay. The subject line of the email is "police
14 oversight." Would this have been related to the
15 Common Council's Police Oversight Committee?

16 A I'm not sure.

17 Q I'll direct your attention to paragraph four, and you
18 seem to be providing some information or description
19 of the role of -- or the activities of the Housing
20 Unit. Would you agree with that?

21 MR. POOLE: Form.

22 A Yes.

23 Q And you explained that on orders of the commissioner,

1 the Housing Unit had been primarily focused on
2 Shaffer Village and Langfield as of late. Why was
3 that?

4 A I don't know.

5 Q You stated, "The officers proactively, and when
6 needed, conduct roadblocks, do hall and stairway
7 sweeps, monitor activity throughout the BMHA camera
8 system and engage bike patrols. We also provide
9 continual patrol, collect information regarding
10 criminal activity and assist property managers when
11 requested," correct?

12 A Yes.

13 Q And all these activities are meant to reduce crime in
14 and around BMHA buildings, right?

15 A Yes.

16 Q Including the roadblocks?

17 A Yes.

18 Q And this email doesn't mention traffic safety, does
19 it?

20 A No.

21 Q Now, something that I've heard you talk about today
22 is police presence. Can you tell me what police
23 presence is?

1 A It's being --

2 MR. POOLE: Form. Go ahead.

3 A It's being visible in designated areas. It's simply
4 being there -- the people in the areas know that
5 we're there.

6 Q And what is the benefit of police presence?

7 A In the moment, it hopefully reduces crime.

8 Q And how would police presence reduce crime?

9 A Presumably a person intent on committing a crime
10 wouldn't do it in the presence of a police officer or
11 with the knowledge that a police officer is nearby.

12 Q And I will introduce as Brinkworth 13 a series of
13 emails between you and Officer Macy. And they're
14 identified as COB591098.

15 A Okay.

16 Q So this is a series of emails dated May 12, 2016.
17 And in this email, Officer Macy is referring to
18 recent shootings at Langfield, correct?

19 A Yes.

20 Q And Langfield was a BMHA property?

21 A Yes.

22 Q And he is speaking about the specific locations of
23 the shootings, right?

1 A He did refer to them, yes.

2 Q And then he says, "The lieutenants are aware of this
3 and have had the guys spending more time up there as
4 well check points at locations in the area," correct?

5 A Yes.

6 Q So in this case, the Housing Unit was running
7 checkpoints at Langfield in response to shootings,
8 right?

9 A Yes, yes.

10 Q And there was a law enforcement purpose for running
11 these checkpoints?

12 A Yes.

13 Q And what was that purpose?

14 A Well, there were ten shootings in the area including
15 a homicide. Part of it is to -- again, presence,
16 hopefully to prevent more shootings.

17 Q The email doesn't say anything about traffic safety,
18 does it?

19 A No.

20 Q Your response to the email was "to reiterate that we
21 need to be in the area," right?

22 A Yes.

23 Q So you approved the running of checkpoints as part of

1 the law enforcement response to these shootings?

2 MR. POOLE: Form.

3 A Apparently, yes.

4 Q When the Housing Unit ran its own checkpoints without
5 the Strike Force, did it issue directives?

6 A No.

7 Q When the Housing Unit and Strike Force officers
8 identified vehicles at checkpoints that were out of
9 compliance with the vehicle traffic law, they issued
10 tickets, right?

11 A I believe so.

12 Q And they were directed to issue as many tickets as
13 possible, right?

14 MR. POOLE: Form.

15 A They were directed to issue tickets when necessary.

16 Q I'm going to go back to Brinkworth 10, which was the
17 Roadblock Directive.

18 A Okay.

19 Q And if we look at the instructions for the roadblock,
20 it says, "Act on any and all probable cause resulting
21 from information obtained from the mobile plate
22 reader or from 'plain view' observations."

23 A Okay.

1 Q And "Write summons for all who are in violation of
2 any of the above or other New York State Vehicle &
3 Traffic laws."

4 A Okay.

5 Q Do you interpret this directive as giving the
6 officers discretion as to whether and how many
7 tickets to write at a checkpoint?

8 MR. POOLE: Form.

9 A It appears that the directive requires them to write
10 for any violation.

11 Q And the goal of this is to enforce provisions of the
12 vehicle and traffic law, right?

13 A Yes.

14 Q Did you ever take any specific steps to ensure that
15 officers were, in fact, making roadblocks obvious
16 with overhead flashing lights?

17 A I don't -- I had only been on a handful of them, and
18 each time they had their lights activated.

19 Q Did you ever take any specific steps to ensure that
20 roadblocks were not unreasonably intrusive to
21 motorists?

22 A We just made sure that cars could pass safely.

23 Q Did you ever conduct any studies or analysis of wait

1 times or traffic slowdowns caused by roadblocks?

2 A No.

3 Q When you were at a roadblock, did you have occasion
4 to observe how long people would wait while passing
5 through the roadblock?

6 A I saw a car stopped.

7 Q The way that the roadblock functioned was that the
8 cars would pass through and some cars would pass
9 through and others would be flagged to be pulled over
10 for a secondary stop; is that right?

11 A Yes.

12 Q Do you know how long a car would wait in between the
13 first stop and the second stop?

14 A I have no idea. I guess it would depend on the
15 number of summonses issued or what the officer needed
16 to do.

17 Q When you were at roadblocks, did you witness multiple
18 cars being pulled to the side of the road waiting for
19 tickets to be issued?

20 A There were times that there were cars sent over to
21 the side, yes, more than one.

22 Q And did you also witness tow trucks at the roadblock
23 in case cars were needing to be towed away?

1 A I don't recall seeing tow trucks set up there, no.

2 Q Were K-9 dogs at the roadblocks that you attended?

3 A Not that I recall.

4 Q How were the locations for the Strike Force
5 roadblocks determined?

6 A I don't know.

7 MR. POOLE: Pardon me, Claudia. I
8 apologize. Can we go off the record for a
9 second?

10 MS. WILNER: Sure.

11 (Discussion held off the record.)

12 MS. WILNER: Would you be able to just
13 read back the last question and answer so we
14 can remember where we were?

15 (Record read by reporter.)

16 BY MS. WILNER:

17 Q So who did set the checkpoint locations?

18 A Originally, it was Derenda.

19 Q And did there come a time when Derenda stopped
20 setting checkpoint locations?

21 A There was a point the lieutenants picked up.

22 Q At the beginning, Derenda would send daily emails
23 with checkpoint locations, right?

1 A That I don't know.

2 Q Okay. Do you recall receiving those emails?

3 A I don't.

4 Q Okay. When Derenda left the choice of location to
5 the lieutenants, was anybody providing oversight over
6 that choice?

7 A I don't know.

8 Q You were not providing oversight?

9 A No.

10 Q Did you witness anybody else providing oversight?

11 A Not that I recall.

12 Q Were you aware at the time that the vast majority of
13 checkpoints took place in Black neighborhoods on the
14 east side of Buffalo?

15 A I don't recall.

16 MR. POOLE: Form of the question.

17 Q And was that because you weren't personally involved
18 in setting the locations for checkpoints?

19 A No, I wasn't involved.

20 Q The commissioner expected Strike Force officers to
21 issue a large number of traffic tickets, right?

22 MR. POOLE: Form.

23 A I don't know what his expectations were.

1 Q Did you ever have conversations with the commissioner
2 where he talked about his expectations for
3 production?

4 A Not that I recall.

5 Q Did he make you responsible for ensuring production
6 by Strike Force and Housing Unit officers?

7 MR. POOLE: Form.

8 A No.

9 Q Was your job in any way contingent on the numbers
10 that the Strike Force and Housing Unit produced?

11 A No.

12 Q Did you monitor the numbers of tickets and impounds
13 and parking tags and arrests coming from the Strike
14 Force and Housing Unit?

15 A I would see them at the end of the month, see the
16 statistics.

17 Q I will introduce as Brinkworth 14 an email that you
18 sent to Deputy Beaty. It's identified as COB591044,
19 and it was sent on April 15, 2015, and the subject
20 line is "Crime-fighting strategies." And I'll give
21 you a minute to read it.

22 A Okay.

23 Q Do you recall writing this email to Deputy Beaty?

1 A No.

2 Q In the email you state, "I believe we need to focus
3 more on a continuous and persistent police presence
4 in high-crime areas rather than a reliance on
5 statistics." Can you explain what you mean by this?

6 A Well, a lot of times, statistics drive what we do.
7 Like arrest statistics, like I said in the next
8 sentence, tells a very limited story. It just means
9 that you remove somebody from that immediate area and
10 when you do that, you lose that presence.

11 Q How would you lose the presence?

12 A The officers would have to take the subject to be
13 booked.

14 Q And so when you were wanting to focus on police
15 presence rather than a reliance on statistics, were
16 you speaking specifically about arrest statistics?

17 A Yeah.

18 Q And is the approach that you outlined here in this
19 email, is it different from the way that the Strike
20 Force and Housing Units normally operated?

21 A Well, no. I mean, there was the presence, but if you
22 made an arrest, you had to make your arrest. But
23 again, the more people we can put in these high crime

1 areas and create that presence, that I thought that
2 was more advantageous. A lot of times what I would
3 ask, if we took some officers out of -- if an officer
4 had to leave because of an arrest, you'd have to try
5 to backfill with other officers to put him back into
6 that area just to maintain that presence.

7 Q Um-hum. If the police activity was for something
8 short of an arrestable offense like a traffic
9 violation or a quality of life violation, did that
10 have the same effect on police presence?

11 A Well, it's a shorter time out of the area. They
12 still would be in the area because they'd presumably
13 be writing their tickets in the car. If there was a
14 city ordinance violation, they would be issuing that
15 also. So they wouldn't -- physically wouldn't be
16 taken out of that dedicated area.

17 Q Do you think that issuing traffic violations and city
18 ordinance violations is an effective way of reducing
19 crime?

20 MR. POOLE: Form. I believe he's asked
21 and answered that.

22 A Yeah, I do, because again, you're creating that
23 presence. You know that these laws are going to be

1 enforced, and hopefully you have the ancillary
2 benefit of people not doing these things. You move
3 the crime away.

4 Q And what did you mean when you said "a world in which
5 budget constraints impact policing in an appreciable
6 way"?

7 A Just that. We don't have the funding anymore. I
8 don't know much about the budget for the police
9 department, but I would think that a lot of the
10 budget is eaten up by personnel costs. We don't have
11 manpower the way we used to.

12 Q Were the Strike Force and Housing Unit officers aware
13 of budget constraints on their policing?

14 MR. POOLE: Form.

15 A I don't know; I don't know.

16 Q Were they aware of their role in generating revenue
17 for the city through tickets and parking tags and
18 impounds?

19 MR. POOLE: Form.

20 A I don't know.

21 Q Was that something that you thought about as chief?

22 A No.

23 Q I want to introduce as Brinkworth 15 an email

1 identified as COB056249. It's actually an email
2 chain, and it has to do -- I'll just let you read it.
3 Let me know when you would like me to scroll down.

4 A Okay. Scroll down. You can scroll. Okay.

5 Q Looking at the email at the bottom of the page, it's
6 Patrick Roberts to Laurie Fitzgerald, and it's
7 copying you and Commissioner Derenda. It's dated
8 April 21, 2013. And Captain Roberts is asking for
9 additional plate readers, and he says, "I believe the
10 readers would pay for themselves in about two weeks."

11 A Okay.

12 Q And he also says that there is a great deal of
13 interest from the Housing Unit and the Strike Force
14 Unit officers in having additional plate readers. So
15 why would the Housing and Strike Force officers have
16 a great deal of interest in additional plate readers?

17 MR. POOLE: Form.

18 A I can't speak for them.

19 Q Why do you think that Captain Roberts believed that
20 the plate readers would pay for themselves in about
21 two weeks?

22 MR. POOLE: Form.

23 A It's very possible because we'd be able -- they'd be

1 able to write more summonses.

2 Q Plate readers also make it possible to impound more
3 vehicles, correct?

4 A Yes.

5 MR. POOLE: Form.

6 Q Do you think it's appropriate for Captain Roberts to
7 be considering whether the readers would pay for
8 themselves through increased ticketing?

9 MR. POOLE: Form.

10 A I don't know that that's necessarily in his
11 wheelhouse, so to speak.

12 Q And what do you mean by that, that it's not in his
13 wheelhouse?

14 A That I don't know that that's his -- that would be
15 his area of concern.

16 Q I will introduce as Brinkworth 16 a document
17 identified as COB591726, and this is an email chain
18 between you and David Wilcox. He was a Strike Force
19 lieutenant, right?

20 A Yes.

21 Q And Captain Roberts was also involved in this chain.
22 It's dated March 18, 2014. And I will give you a
23 moment to read it.

1 A If you could push that up, please. Okay.

2 Q I'll direct you to the place in the email where
3 Lieutenant Wilcox says "our unit impounds more cars
4 and writes more summons (by a wide margin) than any
5 district or unit in the city. Our single plate
6 reader has been paid for many times over."

7 So here Lieutenant Wilcox appears to believe
8 that Strike Force officers should get more plate
9 readers because they can generate the revenue to pay
10 for them. Would you agree with that?

11 MR. POOLE: Form.

12 A It appears that because they do so much work, they do
13 write a lot of summonses, that it's needed. I can't
14 speak to his -- go ahead.

15 Q You go. Please finish your answer.

16 A I can't speak to whether he has any insight into
17 budget.

18 Q Would you agree that his email shows an awareness
19 that his work writing summons and impounding vehicles
20 generates revenue for the city?

21 A Yes.

22 MR. POOLE: Form.

23 Q And he also states that he needs additional plate

1 readers in order to meet the commissioner's
2 expectations for production, right?

3 MR. POOLE: Form.

4 A He does mention that, yes.

5 Q Do you think it's appropriate for a police lieutenant
6 to request equipment to increase tickets and impounds
7 with the justification that the tickets and impounds
8 would pay for the equipment?

9 MR. POOLE: Form.

10 A I don't know if that was his intent.

11 Q If that were his intent, do you think it would be
12 appropriate?

13 MR. POOLE: Form, speculative. Don't
14 answer that question, please.

15 MS. WILNER: I'm sorry. He must answer
16 the question.

17 MR. POOLE: Not in the way that that's
18 phrased.

19 MS. WILNER: The only grounds for
20 objecting to a deposition in a federal case
21 is if the witness is about to reveal
22 privileged communication. Are you making a
23 privileged communication here -- a privilege

1 objection?

2 MR. POOLE: No. Your question started
3 with the word "if," so it's a hypothetical
4 and it's not even pertaining to the actions
5 that the witness here took. So if you could
6 rephrase the question, he could answer it.

7 MS. WILNER: Well, I'll consider whether
8 I wish to rephrase the question, but form
9 and -- is not an acceptable grounds for
10 refusing to answer a question, not in a
11 deposition in a federal case.

12 Calls for speculation is also not a
13 valid basis for direction -- for objection,
14 so again --

15 MR. POOLE: It's not calling for
16 speculation; it is speculation.

17 MS. WILNER: I can ask the witness to
18 speculate if I want to. I'm allowed to ask
19 the witness to speculate.

20 Q And so Mr. Brinkworth, I would like you to answer the
21 question.

22 A Please repeat it.

23 MS. WILNER: The question was --

1 actually, Luanne, would you mind reading back
2 the question?

3 (Record read by reporter.)

4 A No.

5 Q I will introduce as Brinkworth 17 a document
6 identified as COB040356. And this is an email from
7 David Wilcox, and it is dated May 30, 2014. You can
8 take a minute to review it.

9 A Okay.

10 Q So in this email, Lieutenant Wilcox is complaining
11 about a new impound form, right?

12 A Yes.

13 Q And he says, "This form will greatly reduce the
14 impound numbers that everyone has come to expect.
15 Less impounds equates to less revenue." Do you see
16 that?

17 A Yes.

18 Q And have you seen this email before today?

19 A No.

20 Q What did Lieutenant Wilcox mean by "the impound
21 numbers that everyone has come to expect"?

22 MR. POOLE: Form.

23 A I don't know.

1 Q Were you aware of expectations for impounds on Strike
2 Force officers?

3 A No.

4 Q Why do you think Lieutenant Wilcox said "less
5 impounds equates to less revenue"?

6 MR. POOLE: Form.

7 A Well, if they're sent over to the Buffalo impound, I
8 believe there's charges attendant to that including
9 storage charges.

10 Q Do you understand Lieutenant Wilcox to be arguing
11 that the Strike Force should be able to do more
12 impounds so as to generate more revenue?

13 MR. POOLE: Form.

14 A It does appear to imply that.

15 Q I will introduce as Brinkworth 18 a document
16 identified as COB040359, and this is another email
17 from Lieutenant Wilcox that's dated March 8, 2014
18 sent to Captain Roberts. And you can take a minute
19 to read through it.

20 A Okay.

21 Q And Lieutenant Wilcox is complaining that there is no
22 working plate reader in the Strike Force fleet at
23 that time, right?

1 A Yes.

2 MR. POOLE: Form.

3 Q And he says that the Strike Force has impounded 3,300
4 cars, creating hundreds of thousands of dollars,
5 right?

6 A Yes.

7 Q Lieutenant Wilcox seems to -- well, scratch that.

8 Do you think that Lieutenant Wilcox seems to
9 believe that his job in part is to bring in revenue
10 for the city through vehicle impounds?

11 MR. POOLE: Form.

12 A I believe he believes his job is to impound cars, and
13 the ancillary of that is it brings in revenue for the
14 city.

15 Q Was it a commonly held belief among Strike Force and
16 Housing Unit officers that their police work brought
17 a financial benefit to the city?

18 MR. POOLE: Form.

19 A I can't speak for them.

20 Q Was that a subject that you ever spoke with Strike
21 Force and Housing Unit officers about?

22 A No, I never spoke with them about revenue generation.

23 Q I will mark as Brinkworth 19 a document COB063327,

1 and this is an email from Patrick Roberts. You're
2 copied on the email. It's to Commissioner Derenda.
3 It's dated January 10, 2013. It has to do with
4 overtime, and I'll give you a minute to read the
5 email.

6 A Okay.

7 Q So in this memo, Captain Roberts is requesting that
8 Housing Unit overtime be allowed to continue, right?

9 A Yes.

10 Q And he says "the officers have shown great production
11 with regards to arrests, V/T issuances, and vehicle
12 impounds, more than paying back the city for its
13 overtime expense. I will personally see to it that
14 the officers continue to produce at this high rate."

15 Would you agree that Captain Roberts is
16 demonstrating an awareness that the work of the
17 Strike Force and Housing Unit is generating revenue
18 for the city?

19 MR. POOLE: Form.

20 A Yes.

21 Q And Captain Roberts also seems to believe that in
22 order to receive overtime, the Housing Unit needed to
23 generate the revenue to pay for it. Do you agree?

1 MR. POOLE: Form.

2 A I'm sorry. Repeat that, please.

3 Q Would you agree that Captain Roberts seems to believe
4 that in order to receive overtime, the Housing Unit
5 needs to generate the revenue to pay for it?

6 A I don't necessarily think that's the case.

7 Q What is your interpretation?

8 A I think it might bolster their argument.

9 Q Were overtime details in any way dependent on
10 generating the revenue to pay for them?

11 A Not that I know of.

12 Q Do you recall discussing this memo with Captain
13 Roberts?

14 A No.

15 Q Do you recall ever telling Captain Roberts that he
16 was wrong to suggest that Housing Unit officers had
17 the responsibility to generate enough revenue to pay
18 for overtime details?

19 A I don't recall that.

20 MR. POOLE: And just so we're all on the
21 same page scheduling-wise, I'm hoping to take
22 a lunch break maybe around 12:30. Does that
23 work for everybody?

1 THE WITNESS: Sure.

2 MR. POOLE: Certainly.

3 Q I'll introduce as Brinkworth 20 a document that's
4 been identified as COB053722. And this is an email
5 from Patrick Roberts to Commissioner Derenda and
6 you're copied on it, and the date is May 3, 2013.
7 And I'll give you a minute to read it.

8 A Okay.

9 Q So in this email, Captain Roberts is boasting about
10 the Housing and Strike Force statistics, right?

11 A Yes. He's laying them out, yes.

12 Q And he also says that a great reward would be an
13 overtime detail, right?

14 A Yes, he does say that.

15 Q Why would overtime opportunities be viewed as a
16 reward?

17 MR. POOLE: Form.

18 A Well, overtime provides more money in your paycheck.

19 Q Did officers get paid time and a half for overtime?

20 A Yes.

21 Q And some officers increased their salaries
22 considerably by working overtime, didn't they?

23 A Yes.

1 MR. POOLE: Form.

2 Q And did working overtime also give opportunities --
3 excuse me.

4 Did working overtime also give officers the
5 opportunity to increase their pensions?

6 A Yes.

7 Q Did you see overtime opportunities as a reward for
8 production?

9 A No.

10 Q Did you correct Captain Roberts' belief that overtime
11 is a reward for production?

12 A I don't recall having that conversation.

13 Q Did you ever look into whether Captain Roberts was
14 communicating down the chain of command that overtime
15 was available as a reward for production?

16 A I did not hear that.

17 Q And did you look to see whether that was happening?

18 A No.

19 Q As chief, did you have a philosophy about how best to
20 use overtime?

21 A I had little or no authority in that regard. I had
22 no control over how overtime was meted out or how
23 details were set up. That was not anything that I

1 had anything to do with.

2 Q What kind of expectations were placed on officers in
3 exchange for working overtime shifts?

4 A I don't know.

5 MR. POOLE: Form.

6 Q If officers failed to produce arrests and tickets and
7 impounds while working overtime shifts, would they
8 still have the opportunity to work them?

9 A Again, I had no control over that. I did not make
10 that determination.

11 MR. POOLE: Form of the question. Sorry
12 to -- I'm trying not to interrupt.

13 MS. WILNER: That's okay. That's your
14 job.

15 Q In July 2015, the City of Buffalo launched the
16 Buffalo Traffic Violations Agency, correct?

17 A I don't know. I don't recall dates.

18 Q You recall that there did come a time when the city
19 launched the Buffalo Traffic Violations Agency?

20 A Yes.

21 Q And I will use the abbreviation BTVA for the Traffic
22 Violations Agency.

23 A Okay.

1 Q The BTVA allowed the city to take over traffic
2 adjudications from the state, right?

3 A I believe so.

4 Q And then by taking over the adjudications, the city
5 could keep the revenue from traffic tickets that the
6 BPD issued, right?

7 A I don't know anything -- I had nothing to do with any
8 of that. I don't know what the parameters were. I
9 don't know what the policy was.

10 Q I'll introduce as Brinkworth 21 a document that's
11 identified as COB040467, and this is an email
12 exchange. It includes -- the top is with Roberts and
13 Wilcox. Below that is an email from Lieutenant
14 Wilcox to Captain Roberts and you and the other
15 Strike Force lieutenants, and it's dated March 30,
16 2015, subject, traffic violations. And I'll give you
17 a minute to read the email.

18 A Okay.

19 Q And Lieutenant Wilcox says, "Officers read the Sunday
20 *Buffalo News* article detailing the city taking over
21 the Traffic Violations Bureau. The article clearly
22 states the financial benefits the city will reap from
23 handling such matters." Do you recall whether at the

1 time you read the Sunday *Buffalo News* article that
2 talked about the city taking over the Traffic
3 Violations Bureau?

4 A I couldn't tell you if I read that article or not.

5 Q But you read this email from Lieutenant Wilcox,
6 right?

7 A It was emailed to me. I can't tell you that I did or
8 not, but presumably, yes.

9 Q Based on this email, you would have been at least
10 aware of increased financial benefits that the city
11 would gain from handling its own traffic violations,
12 right?

13 MR. POOLE: Form.

14 A I guess, yeah.

15 Q Was this new revenue source ever something that you
16 discussed with the Strike Force and Housing Unit
17 officers?

18 A Not that I recall.

19 Q Was the new revenue source something that you ever
20 discussed with your commanding officers?

21 A Not that I recall.

22 Q I'll introduce as Brinkworth 22 a document identified
23 as COB042316, and this is a two-page document. It

1 was sent on January 6, 2018 with the subject line
2 "2017 Stats."

3 And I understand that the email was sent during
4 a time after you were no longer with the Strike Force
5 and Housing Unit, but if we scroll to the second
6 page -- and I will flip the view so it's easier -- we
7 can see that the statistics include the time period
8 when you were the Strike Force and Housing Unit
9 chief. So let me try to rotate this here so we can
10 look at the statistics.

11 Have you seen these numbers before?

12 A No.

13 Q Do you have any reason to believe that they are not
14 accurate?

15 A No.

16 Q Do you see that between 2014 and 2015 the number of
17 traffic summonses jumped substantially?

18 MR. POOLE: Form.

19 A Yeah. I do see that, yeah.

20 Q And then it jumped again between 2015 and 2016,
21 right?

22 A Yes.

23 Q What is your explanation for the increase in traffic

1 tickets during this time period?

2 A Heightened enforcement. It's possible that they
3 were -- they were daytime details so the officers
4 were out on the street more than just their regular
5 shift.

6 Q Do you have any specific memories of there being
7 increased daytime details during this time period?

8 A I'm not certain of the date, the actual time period,
9 but there were daytime details at one time.

10 Q I'll introduce as Brinkworth 23 an article from *The*
11 *Buffalo News* dated February 6, 2016. It's entitled
12 "Behind Buffalo's dramatic rise in traffic tickets."

13 Do you recall reading this article when it came out?

14 A No.

15 Q Would it have been your practice to read major
16 articles in *The Buffalo News* around the operations of
17 the Buffalo Police Department?

18 A I don't read *The Buffalo News* other than the sports
19 page any longer, so I just -- I don't read *The*
20 *Buffalo News*.

21 Q Well, I'm going to turn to page 6 of the article.
22 And if we look at this part of the article, according
23 to the article, the Buffalo Traffic Violations Agency

1 began operations on July 1, 2015, and just in that
2 month, traffic tickets jumped by 43 percent.

3 A Okay.

4 Q Do you have any reason to believe that the figures in
5 the article are incorrect?

6 A I have no knowledge of how they were generated.

7 Q Do you have an explanation for a dramatic rise in
8 traffic tickets that coincides with the launch of the
9 BTVA?

10 A I don't.

11 Q Is it possible that the Strike Force and Housing Unit
12 officers were writing more tickets because they knew
13 that the city could make more money from those
14 tickets?

15 A I don't know what their motivation was.

16 Q Did you discuss *The Buffalo News* article with anybody
17 else within the Buffalo Police Department?

18 A I don't recall reading it, so I don't know that I had
19 that discussion.

20 Q Do you recall having discussions generally about the
21 role of the BPD in generating revenue through
22 ticketing?

23 A Not that I recall.

1 Q And when you were chief, nobody asked you to look
2 into the issue of increased ticketing, right?

3 A No.

4 Q Okay. I think I'm actually in a good place to stop.
5 I just had a couple of questions, like background
6 questions that I wanted to go back to before we
7 break.

8 I was wondering when you began your legal
9 education and became an attorney. Was that --

10 A I started in 1992 at the University of Akron. I came
11 back. I finished my first two years. I had a
12 daughter, so I had to take a leave of absence. So I
13 finished in 1996.

14 Q So you were also an attorney at the time that you
15 were the chief of the Strike Force and Housing Unit?

16 A Yes.

17 Q And did you maintain an active license during that
18 time period?

19 A Yes.

20 MS. WILNER: Okay. Thank you. Is
21 everybody okay for breaking for lunch right
22 now?

23 MR. POOLE: For how long?

1 MS. WILNER: For how long, yeah, that
2 was my next question. I mean, I don't think
3 that we need a long break.

4 I would defer to Luanne. How long do
5 you think you need for lunch?

6 THE REPORTER: I'm fast. However long
7 you guys want.

8 MS. WILNER: Okay. Do you all have a
9 preference on the time to break for lunch?

10 THE WITNESS: No.

11 MS. WILNER: So 30 minutes?

12 MR. POOLE: Sounds good. Be back at
13 12:45.

14 (A luncheon recess was taken.)

15 BY MS. WILNER:

16 Q One way to increase the number of tickets issued is
17 to write multiple tickets in a single stop, right?

18 A Yes.

19 MR. POOLE: Form.

20 Q And that way, a single stop, instead of just
21 producing one ticket, can produce four or six, right?

22 A Yes.

23 Q Just so we're clear, I'm going to call this practice

1 multiple ticketing.

2 A Okay.

3 Q Did you personally ever provide guidance to the
4 Strike Force and the Housing Unit officers with
5 respect to multiple ticketing?

6 A No.

7 Q And did you request that anybody else in the BPD
8 provide guidance to Strike Force and Housing Unit
9 officers on the multiple ticketing?

10 A No.

11 Q Were you aware that Strike Force and Housing Unit
12 officers had a common practice of engaging in
13 multiple ticketing, for example, with tinted window
14 stops, issuing one ticket for each window?

15 MR. POOLE: Form.

16 A I knew that they were issuing tickets for tints.

17 Q Did you know that instead of issuing a single ticket,
18 they would issue four?

19 A I had heard that, yes.

20 Q And did you feel that it was appropriate for Strike
21 Force and Housing Unit officers to be issuing four
22 tickets in a single stop for tinted windows?

23 MR. POOLE: Form.

1 A I don't recall having an opinion.

2 Q Did you ever speak to Strike Force and Housing Unit
3 officers about their tinted windows ticketing
4 practices?

5 A Not that I recall.

6 Q Did you speak to DPC Lockwood or Commissioner Derenda
7 about multiple ticketing practices in the Strike
8 Force and Housing Unit?

9 A Not that I recall.

10 Q I will mark as Brinkworth 24 a graph that we created
11 based on BPD ticketing data. You wouldn't have seen
12 this before. Feel free to take a few minutes and
13 take a look at it. I can try and make it a little
14 larger, and I'll scroll down so you can see that.

15 So this graph shows the number of tickets that
16 are issued in a single stop by various units of the
17 Buffalo Police Department during the time period 2012
18 to 2018. And the units depicted are the Strike
19 Force, which is yellow, the Housing Unit, which is
20 orange, and the rest of the Buffalo Police
21 Department, which is in green. Are you with me so
22 far?

23 A Yeah.

1 Q You can see that for most of the Buffalo Police
2 Department, their multiple ticketing rates were
3 pretty consistent throughout the time period ranging
4 between say one and a half to two tickets per stop on
5 average.

6 A Okay.

7 Q The Strike Force and Housing Unit, on the other hand,
8 issued many more tickets per stop. And actually, you
9 can see on this chart that starting in about
10 July 2015, the multiple ticketing rates of both units
11 really expanded to the point where the Housing Unit
12 was at one point averaging between five and six
13 tickets in a single stop.

14 Were you aware at the time that the Housing Unit
15 and the Strike Force were engaging in more multiple
16 ticketing than the rest of the Buffalo Police
17 Department?

18 A No.

19 MR. POOLE: Form.

20 Q What information did you have about multiple
21 ticketing rates?

22 A I don't recall.

23 Q Did you collect and assess data about multiple

1 ticketing by the Strike Force and Housing Unit?

2 A No.

3 Q What do you think accounts for the substantial rise
4 in multiple ticketing by the Housing Unit and the
5 Strike Force starting around July of 2015?

6 MR. POOLE: Form.

7 A I don't know.

8 Q Could it have been related to the Buffalo Traffic
9 Violation Administration?

10 A Again, I don't know.

11 Q I'm going to show you another chart that we created
12 based on BPD ticketing data. Again, this isn't
13 something that you've seen before, so take some time
14 to look at it. I'll try to make it a little bit
15 bigger. And this one is specifically looking at
16 average tinted window tickets per incident by month.

17 A Okay.

18 Q So this is a chart that's focusing on stops at which
19 tinted windows tickets were issued, and it's showing
20 the average number of tinted windows tickets that
21 were issued during those stops over time. And you
22 can see that in 2011, 2012, the average number of
23 tinted window tickets was around -- between one and

1 one and a half per stop.

2 But with the advent of the Strike Force, which
3 happened around here, April 2013, those numbers grew.
4 And by September of 2015, the BPD was issuing an
5 average of three tinted windows per stop.

6 Were you aware during this time period that the
7 BPD's tinted window ticketing rate was climbing?

8 A I'm sorry. You were -- there was a little blurb
9 there. Could you repeat?

10 Q Yes. Were you aware that the BPD's tinted window
11 ticketing rate was climbing?

12 A I don't recall it.

13 Q Did anybody ever ask you to collect and assess data
14 about tinted windows ticketing?

15 A No.

16 Q Why did the BPD issue so many tinted windows tickets?

17 MR. POOLE: Form.

18 A I don't know. Because each car has potentially four
19 tickets -- four windows to issue if they're tinted.

20 Q Did you ever have conversations with officers on the
21 Strike Force or the Housing Unit specifically about
22 tinted windows ticketing?

23 A No.

1 Q Would tinted windows ticketing have been related to
2 gang enforcement priorities?

3 A No, not directly, I wouldn't think.

4 Q So if it wasn't for gang enforcement, why was it that
5 so many tinted windows tickets were written?

6 A Because it's a violation of the vehicle and traffic
7 law.

8 Q So it was just part of a general focus on issuing
9 more violations?

10 MR. POOLE: Form.

11 A It was a -- I would -- it was based on writing
12 violations of the V&T law.

13 Q Do you recall Commissioner Derenda or DPC Lockwood
14 ever asking you to convey to the Strike Force and
15 Housing Unit officers that they should not issue more
16 than one tinted windows ticket per stop?

17 A I don't recall, no.

18 Q Did the BPD provide tint meters to Strike Force and
19 Housing Unit officers?

20 A I don't know if the department issued them. No, I
21 don't know.

22 Q I'll mark as Brinkworth 25 a document labeled as
23 COB591650, and this is an email chain between you and

1 Captain Serafini from August 21, 2015.

2 A Okay.

3 Q And does this refresh your memory on whether the BPD
4 issued tint meters to officers?

5 A Well, they're saying -- he's saying that they have
6 tint meters that were given us by -- he's also saying
7 that they don't have any. So it doesn't really
8 refresh my memory that they had them.

9 Q Right. And just to clarify, he said "we don't have
10 any tint meters that were given to us by the
11 department."

12 A Right. So they weren't issued.

13 Q Right. A few of the officers had their own tint
14 meters that they purchased themselves?

15 A Right.

16 Q How would an officer determine whether the windows on
17 a vehicle are unlawfully tinted without a tint meter?

18 A I don't know other than just viewing it and making a
19 determination if they're dark, but I don't know.

20 Q But you would agree that if the law says 70 percent,
21 it could be hard to tell just by looking at it
22 whether it's 70 percent or 69 percent or 71 percent,
23 right?

1 MR. POOLE: Form.

2 A I don't know that you could be exact, no.

3 Q Did you ever request that the BPD issue tint meters
4 to Housing Unit and Strike Force officers?

5 A I don't recall.

6 Q Do you think the BPD should have issued tint meters
7 to Housing and Strike Force officers?

8 A They're an enforcement tool.

9 Q Given the numbers of tinted windows tickets that were
10 issued by the Strike Force and Housing Unit officers,
11 don't you think that they should have been able to
12 measure the tint of the windows to ensure that they
13 were issuing valid tickets?

14 A Well, according to that memo, some of them did have
15 their tint meters, so if they did have tint meters on
16 site, then they could have used those.

17 Q I don't think that was exactly responsive to my
18 question.

19 MS. WILNER: Luanne, would you be able
20 to read the question back again, please?

21 (Record read by reporter.)

22 A Yes. Did that not come through?

23 Q It did. I'm going to return to Brinkworth 22, which

1 has the Housing Unit and Strike Force statistics.
2 And do you see in -- under "City Ordinances" that
3 there was really a dramatic rise in 2016 where the
4 BPD issued 9,916 city ordinance violations, whereas
5 before in 2015 only 717 had been issued?

6 A I do.

7 Q Do you know whether the city ordinances were issued
8 by the Housing Unit, by the Strike Force or by both
9 units?

10 MR. POOLE: Form.

11 A I don't know. I assume by both.

12 Q Why did city ordinance ticketing increase during this
13 time period?

14 A I don't know.

15 Q Were you aware of any special initiatives that would
16 involve issuing city ordinance violations?

17 A Not that I recall.

18 Q Did your commanding officers direct you to have the
19 Strike Force and Housing Unit increase city ordinance
20 violations?

21 A Not that I recall.

22 Q Were you aware at the time of the increase in city
23 ordinance violations?

1 A I don't recall that.

2 Q Looking also at the line for parking tags, we can see
3 that also in 2016, there was really a dramatic rise
4 in parking tags issued as compared to 2015 with the
5 numbers going from 1,993 in 2015 to 8,895 in 2016.
6 Do you know why parking tags increased so much during
7 this time period?

8 A No.

9 Q Were you aware at the time of the increase in these
10 parking tags?

11 A Not that I recall.

12 Q It was the case, though, that you would receive the
13 reports with statistics that would show these
14 increases, right?

15 A I would receive them, yeah.

16 Q So the information was available to you?

17 A Yeah, on a monthly basis, yeah.

18 Q But you weren't paying attention to it?

19 MR. POOLE: Form.

20 A I don't know -- you're asking me if I recall that. I
21 don't know what my actions were at that time.

22 Q City ordinance violations and parking tags also
23 generated revenue for the city, didn't they?

1 A Yes.

2 Q As chief, were you responsible for ensuring that
3 BPD's policy regarding towing and impounds was
4 correctly followed?

5 A As a chief?

6 Q Yeah.

7 A Again, my primary focus was on schools. I was --
8 that was hoisted on me. I didn't have a lot to do
9 with the day-to-day operations of those units. I
10 guess you could say it would trickle down to me and
11 to others.

12 Q You would generally as chief have the obligation and
13 responsibility of ensuring that subordinate officers
14 were following BPD policy in the Manual of
15 Procedures, right?

16 MR. POOLE: Form.

17 A Yes.

18 Q Did BPD policy permit towing vehicles solely for
19 expired registration?

20 A I don't recall. I believe it did.

21 Q And what about solely for an expired license?

22 A For a driver's license?

23 Q Yes.

1 A I'm not certain, but I believe, yes. I'm not
2 certain.

3 Q And what about an expired inspection sticker?

4 A I believe so.

5 Q And are you familiar with VTL -- and that's an
6 abbreviation for vehicle and traffic law --
7 VTL 511-b?

8 A I was not a traffic enforcement guy. I was not -- I
9 didn't write very many tickets, so I believe that has
10 something to do with the license.

11 Q Correct. That is the -- is related to aggravated
12 unlawful operation, which is driving on a suspended
13 or revoked license.

14 Did BPD require a tow for a violation of
15 VTL 511-b no matter the gravity of the offense?

16 A I don't know.

17 Q Did the Housing Unit and Strike Force routinely tow
18 for violations of VTL 511-b no matter the gravity of
19 the offense?

20 MR. POOLE: Form.

21 A I don't know that.

22 Q Okay. We can go ahead and look at BPD's written
23 policies in this area. And Brinkworth 26 is or

1 should be section -- yeah, here we are -- the section
2 of the Manual of Procedures that deals with vehicle
3 towing and storage. Are you familiar with this part
4 of the Manual of Procedures?

5 A Yeah. Yeah, about towing.

6 Q Okay. So I'm going to go down. We can look at
7 Section 6.3, "When Vehicles May Be Towed." You can
8 let me know when you need me to scroll down.

9 A Okay. Okay.

10 Q I will note that in Section E, the policy is that
11 vehicles may not be impounded solely for an expired
12 driver's license, registration or inspection sticker,
13 right?

14 A Yes, right.

15 Q And I will direct your attention to Section D(4),
16 which says, "Vehicles seized pursuant to VTL 511-b
17 shall be towed."

18 A Okay.

19 Q Can you explain what "seized pursuant to VTL 511-b"
20 means?

21 A Well, that's the section regarding driving without a
22 license. Seized would be that the officers took
23 control of the vehicle and towed it to the impound.

1 Q And does VTL 511-b require seizure only for first and
2 second degree offenses or for all offenses?

3 A I'm not familiar with that section.

4 Q Okay. I'll introduce as Brinkworth 27 a copy of
5 VTL 511-b. It says VAT here, but it's the same
6 thing. And we can scroll down, and you can read
7 number one.

8 A Okay.

9 Q Have you read this before?

10 A No. It doesn't look familiar to me, no.

11 Q But you agree that this is the section of the law
12 referenced in the Manual of Procedures that we just
13 looked at, right?

14 A Yes.

15 Q And you agree this VTL 511-b requires seizure only in
16 connection with arrests for VTL 511 in the first and
17 second degree, right?

18 A Yeah, aggravated in the first and second degree,
19 okay.

20 Q It does not require seizure in connection with an
21 arrest for VTL 511 in the third degree, right?

22 A It doesn't seem to, no.

23 Q And yet, VTL 511 in the third degree was one of the

1 more common tickets that the Strike Force and Housing
2 Unit issued, wasn't it?

3 MR. POOLE: Form.

4 A I don't know.

5 Q Do you know the difference between VTL 511 in the
6 first and second and third degrees?

7 A I do not.

8 MR. POOLE: Form.

9 Q It wasn't part of your responsibility as chief to be
10 aware of the legal requirements around the laws that
11 your officers were enforcing?

12 MR. POOLE: Form.

13 A There's numerous laws, and I was administrator. I
14 didn't write summonses. If there was an issue, you
15 could always refer to various laws, VTL, PL, the
16 penal law, but I did not know it off the top of my
17 head.

18 Q I'm going to return to this section of the Manual of
19 Procedures that deals with towing. And it says in
20 here that "Vehicles seized pursuant to VTL 511-b
21 shall be towed," but that would only apply to first
22 and second degree violations, right?

23 MR. POOLE: Form.

1 A Yes.

2 Q The manual doesn't provide any specific written
3 guidance as to what officers should do when issuing
4 violations for VTL 511 in the third degree, right?

5 A It does not appear to.

6 Q I'll also draw your attention to Section D(3), which
7 states that "Vehicles shall not be routinely towed
8 incident to arrest."

9 A I'm sorry. Can you bring that down, please?

10 Q Bring it down, yes. It's right here. (Indicating.)

11 A Oh, I'm sorry. I didn't see that. Okay.

12 Q Did there ever come a time when you became concerned
13 that the Housing Unit and Strike Force towing
14 practices were violating this provision of the MOP?

15 A I don't recall.

16 Q So I'll introduce as Brinkworth 28 the document
17 identified as COB591930. And this is an email from
18 Thomas Whelan to Captain Roberts regarding when
19 vehicles may be towed. And Thomas Whelan was another
20 Strike Force lieutenant, right?

21 A Yes. Okay.

22 Q Okay. And then before we go forward with questions,
23 I want to introduce a second email. This is

1 COB591446. We'll call it Brinkworth 29. It's dated
2 January 1, 2014. It's from you to Roberts and
3 Whelan. And you agree that these two emails seem to
4 be about the same incident or same conversation?

5 A Yes.

6 Q So I'll just bring up the first one again so that we
7 can look at it. In this email, Lieutenant Whelan is
8 stating that he wants to enthusiastically endorse the
9 aggressive manner in which the Strike Force
10 approaches its work, but he is concerned that the
11 officers are violating Section 6.3(D) of the Manual
12 of Procedures.

13 A Okay.

14 Q In what way would the Strike Force officers have been
15 violating Section 6.3(D)?

16 MR. POOLE: Form.

17 A Possibly with the towing, towing for the 511, 3 --
18 511-b(3) and possibly for towing for the other
19 prohibited -- the inspections and registration.

20 Q Do you know whether Strike Force officers were
21 routinely towing for those forbidden reasons?

22 MR. POOLE: Form.

23 A They were -- they did tow for those -- some of those

1 reasons, but I don't know if it was incidental to a
2 511-b 1 and 2, though.

3 Q Would you agree that if it was not incidental to a
4 511-b 1 or 2, then it would be contrary to the Manual
5 of Procedures?

6 A Yes.

7 Q Lieutenant Whelan says that he doesn't want to inform
8 his officers to do their duties any differently, but
9 instead he wants to protect them from political
10 fallout that would result from citizen complaints.

11 He also seems to be requesting some kind of
12 judgment from his superiors as to whether the Strike
13 Force actions are justified.

14 Is that -- do you agree with that interpretation
15 of this email?

16 MR. POOLE: Form.

17 A Well, he did mention political fallouts.

18 Q And do you believe that Strike Force officers were
19 justified in engaging in these tows that were outside
20 of what was permitted by the Manual of Procedures?

21 MR. POOLE: Form.

22 A Again, I don't know if they were incidental to other
23 incidents or other issues.

1 Q Did you ever look into it to see if they were?

2 A I don't recall.

3 Q If you had looked into it, do you think you would
4 remember that?

5 A I can't say.

6 Q It sounded like from the second email that you
7 brought the issue up the chain of command because you
8 had said that he wants to meet, something like that.
9 Who would you have spoken with about this?

10 A I would have -- Lockwood would be my
11 direct supervisor -- he would be my line of command,
12 so he would be my direct boss.

13 Q Do you recall whether the meeting that was referenced
14 in the email ever took place?

15 A I don't recall.

16 Q Following this email exchange, did you provide any
17 additional guidance to Strike Force and Housing
18 officers as to their responsibilities when towing and
19 impounding vehicles?

20 A I don't recall having a conversation.

21 Q Do you recall any additional guidance coming down
22 from your superior officers?

23 A I don't recall that either.

1 Q Are you aware of BPD's policy when the driver is
2 cited for driving on a suspended license but there's
3 a licensed third party present who could take the
4 vehicle?

5 A I'm not.

6 Q Did the Manual of Procedures provide any guidance on
7 this topic?

8 A I don't remember.

9 Q Are you aware that the Fourth Amendment prohibits
10 tows and impounds in certain circumstances?

11 A Not directly on specifics, no.

12 Q Were officers trained on the Fourth Amendment
13 limitations on towing vehicles?

14 A I don't know.

15 Q Did you ever receive training on that topic?

16 A Not that I recall.

17 Q Did you ever provide training to officers on that
18 topic?

19 A No.

20 Q I'll mark as Brinkworth 30 an email chain identified
21 as COB591284. And this is between you and Harold
22 McLellan. It's dated November 19, 2015. Captain
23 Serafini and the commissioner are also on these

1 emails.

2 A Okay.

3 Q And Inspector McLellan says that according to
4 Commissioner Derenda, Strike Force and Housing were
5 told if the owner of a vehicle shows up with a valid
6 operator's license prior to a vehicle being
7 impounded, the vehicle shall be released to that
8 owner. And you said that you would let them know.

9 A Okay.

10 Q Does this sound to you like an accurate description
11 of BPD policy at the time?

12 A Again, I don't recall at that time.

13 Q I'll mark as Brinkworth 31 another document. It's
14 COB042024. And this is a follow-up to that chain.
15 It's Captain Serafini to the lieutenants,
16 November 19, 2015, and you were copied on this email
17 as well. And I'll give you a moment to read it.

18 A Okay.

19 Q I think actually I'm going to go to the next exhibit,
20 which I'll call -- I guess we'll do Brinkworth 33,
21 COB040533. And this is shortly afterwards,
22 November 20, 2015, Captain Serafini to the
23 lieutenants, and you're copied on the email. Go

1 ahead and read it.

2 A Okay.

3 Q And you're saying disregard the previous email.

4 "Lieutenant Whelan had a conversation with the
5 Commissioner today. We can continue to tow away
6 vehicles as in the past with the only exception being
7 if the owner is a passenger in the vehicle and has a
8 valid drivers license, the vehicle should be released
9 to the owner unless a contracted tow truck has
10 already been called, or other extenuating
11 circumstances exist."

12 So you agree that the two statements about BPD's
13 towing policy are contradictory, right?

14 MR. POOLE: Form.

15 A The statement coming from the commissioner, they
16 appear to be contradictory.

17 Q And you were copied on this whole set of
18 communications, right?

19 A Yes.

20 Q Did you do anything to try to resolve the
21 contradiction so that there was an accurate statement
22 of what the BPD towing policy was?

23 MR. POOLE: Form.

1 A Not that I recall.

2 Q If the owner of the vehicle has a valid license, why
3 would a vehicle only be released to them if they were
4 a passenger in the vehicle?

5 A I don't know.

6 Q Why would it matter whether a contracted tow truck
7 has already been called?

8 A That I don't know either.

9 Q Would it be because once a contracted tow truck is
10 called, the city has to pay for the tow regardless of
11 whether it takes place or not?

12 A I'm not sure of the policy regarding private tow
13 trucks.

14 Q Did you ever attempt to speak to the commissioner to
15 clarify the policy?

16 A Not that I recall.

17 Q Were you concerned about the economic impact on the
18 people of Buffalo of losing access to their vehicles
19 because of the BPD's impound policies?

20 A I certainly knew that it would affect people.

21 Q Did you ever bring that up with Commissioner Derenda
22 or DPC Lockwood?

23 A I don't recall having that conversation.

1 Q Did you bring it up with your subordinates?

2 A I don't recall having that conversation.

3 Q Are you familiar with the concept of an investigatory
4 stop?

5 A Somewhat. It's been a while.

6 Q So for purposes of our discussion today, I'll define
7 an investigatory stop as one in which an officer has
8 probable cause to believe that a motorist has
9 committed a traffic violation so they make the stop,
10 but the real reason for the stop is not to enforce
11 the traffic laws, but to have the opportunity to
12 investigate whether another more serious crime is
13 afoot.

14 Did the Strike Force and the Housing Unit make
15 investigatory stops as part of its proactive policing
16 strategy?

17 MR. POOLE: Form.

18 A They make car stops. I don't know -- they made car
19 stops. I don't know if it was for that particular
20 reason.

21 Q Does the BPD have any written policy on investigatory
22 stops?

23 A I don't recall.

1 Q Does the BPD have an unwritten policy?

2 A Not that I'm aware of.

3 Q Did the BPD provide training or guidance to those
4 officers on making investigatory stops?

5 A I don't recall.

6 Q Did you personally provide training or guidance to
7 the Strike Force or Housing Unit on making
8 investigatory stops?

9 A No.

10 Q Did you ever communicate to Strike Force and Housing
11 Unit officers what they should be looking for when
12 making an investigatory stop?

13 A Not that I recall.

14 Q Do you believe that the race of the person stopped is
15 a relevant consideration when making an investigatory
16 stop?

17 A No.

18 Q Is this something that you ever discussed with your
19 officers?

20 A Not that I recall.

21 Q Former BPD official, Jeff Rinaldo, recently told the
22 *Investigative Post* -- this is a quote -- "There's no
23 such thing as a routine traffic stop. You never know

1 who it is you're stopping in that car, what they may
2 have just done, what they may have just committed."
3 Do you agree with that statement?

4 A Yeah. On a V&T stop, there is the great unknown.
5 You don't know what you're approaching.

6 Q Would you say that that view is part of the culture
7 of the BPD?

8 A I think that is law enforcement -- I think that's --
9 is throughout all law enforcement that we simply
10 don't know what we're going to encounter when you
11 walk up to a car.

12 Q Anybody in that car could be dangerous?

13 A Yes.

14 Q Strike Force did most of its traffic stops on the
15 east side, right?

16 MR. POOLE: Form.

17 A I don't have the data in front of me, but I believe
18 they were assigned to the east side predominantly.

19 Q And why was that?

20 A Because that was the higher crime area in the city.

21 Q Wouldn't you agree that the vast majority of people
22 on the east side of Buffalo are law-abiding citizens?

23 MR. POOLE: Form.

1 A I would -- yes.

2 Q And people in North and South Buffalo also commit
3 traffic violations?

4 A Yes.

5 Q And people in North and South Buffalo also possess
6 drugs?

7 MR. POOLE: Form.

8 A I can't say one way or the other that they have drugs
9 but --

10 Q Do people in North and South Buffalo possess weapons?

11 A Again, I can't say with any specificity.

12 Q Are people in North and South Buffalo also involved
13 with gangs?

14 A Again, I can't say with any specificity.

15 Q Well, you were a lieutenant in South Buffalo, right?
16 I mean, you --

17 A Yes.

18 Q -- know the A District. You worked there.

19 A Yes.

20 Q Did you see those types of violations with A
21 District?

22 A I'm sure there were issues with guns, but I can't
23 recall offhand.

1 Q Would it be unlawful to pull somebody over for an
2 investigatory stop because they were Black and
3 driving on the east side and failed to signal?

4 MR. POOLE: Form.

5 A Would it be illegal? Possibly, yeah, if you're
6 profiling them, sure.

7 MR. POOLE: The question is incomplete.
8 Failed to signal for what?

9 MS. WILNER: A turn.

10 Q From your experience, do you believe that people from
11 certain racial groups are more likely to be involved
12 in criminal activity?

13 A From my experience, I have dealt with people of a
14 certain race who have been involved in more crimes,
15 yes.

16 Q And what race are the people who have been involved
17 with more crimes?

18 MR. POOLE: Form.

19 A Black males generally.

20 Q What is your definition of racial profiling?

21 A It is by virtue of that person's race, you're
22 stopping that person for no legitimate reason.

23 Q And what is your definition of racial bias?

1 MR. POOLE: Form.

2 A Racial bias?

3 Q Uh-huh.

4 A Similar. To look at the person, make an assumption
5 based solely on his race.

6 Q Is there a difference between racial profiling and
7 racial bias?

8 MR. POOLE: Form.

9 A Racial profiling seems to be an affirmative act.
10 Bias might simply be implicit. You make an
11 assumption.

12 Q If the officer has probable cause for a traffic stop,
13 can that stop still be the result of racial
14 profiling?

15 A If that person has a legitimate stop, has a
16 legitimate reason?

17 Q Yes.

18 A I believe that if it's a legitimate reason, then you
19 have the right to stop that person.

20 Q Even if the reason for the stop was at least in part
21 related to the person's race?

22 A Not if it's based on race --

23 MR. POOLE: Form.

1 A -- but if he's violated a provision of the law, then
2 he can stop him.

3 Q So your testimony is that if the stop is legitimately
4 based on probable cause, then it can't be racial
5 profiling?

6 MR. POOLE: Form.

7 A I'm not saying that. I'm saying that if it's a
8 legitimate stop -- I can't speak to the intent of the
9 officer. I can only speak to his actions regarding
10 making that stop and the actual -- for the V&T issue.

11 Q Did you personally receive training from the BPD
12 regarding racial profiling or racial bias?

13 MR. POOLE: Form.

14 A I don't recall.

15 Q Did you provide training to the Housing Unit or the
16 Strike Force on racial profiling or racial bias?

17 A Not that I recall.

18 Q Did you ask Captain Roberts or Captain Serafini to
19 provide such training?

20 A Not that I recall.

21 Q Did you ask for officers to receive such training
22 from somebody else?

23 A Not that I recall. That would come through our

1 academy.

2 Q If an officer pulls somebody over for an
3 investigatory stop, the officer doesn't have to write
4 the person a ticket, right?

5 MR. POOLE: Form.

6 A No.

7 Q Whether and how many tickets to write is in the
8 officer's discretion?

9 A Yes.

10 Q Does the BPD have any written policies to guide the
11 officer's discretion in this area?

12 A I don't recall.

13 Q The Amended Complaint that was filed in this action
14 alleges that from 2012 to 2019, drivers from
15 predominantly Black zip codes were eight times as
16 likely to be issued multiple tickets in a single stop
17 than drivers from predominantly white zip codes. Do
18 you have any reason to believe this allegation is
19 incorrect?

20 MR. POOLE: Form.

21 A I don't have the stats in front of me, so I have no
22 way to dispute it.

23 Q Can you explain the racial disparity in issuance of

1 multiple tickets?

2 A I can't.

3 MR. POOLE: Form.

4 Q Do you think that Black drivers commit more traffic
5 violations than white drivers?

6 MR. POOLE: Form.

7 A I don't have the statistics on that. I don't know.

8 Q As chief, did you take any affirmative steps to learn
9 whether your officers were engaging in racial
10 profiling?

11 A No.

12 Q And did anybody within the BPD ever ask you to
13 investigate whether your officers were engaging in
14 racial profiling?

15 A No.

16 MS. WILNER: I just want to take a short
17 break, maybe five minutes.

18 MR. POOLE: Okay.

19 (A recess was taken.)

20 BY MS. WILNER:

21 Q The Buffalo Police Department has an Internal Affairs
22 Division, right?

23 A Yes.

1 Q And the role of Internal Affairs is in part to
2 investigate complaints against BPD officers, right?

3 A Yes.

4 Q As chief, what was your role in the complaint
5 investigation process?

6 A In the investigation process, none.

7 Q I'll mark as Brinkworth 34 a document that's labeled
8 COB000795, and it is Chapter 15 of the Manual of
9 Procedures, which governs discipline. Are you
10 familiar with this part of the Manual of Procedures?

11 A I know what it is, yeah.

12 Q So I'm going to start with Section 1.7, which is
13 coming up, and this addresses supervisors or superior
14 officer responsibilities.

15 A And you're talking the actual investigation.
16 I didn't actually -- I thought you meant actual
17 investigation, doing the legwork on it.

18 Q Okay. Well, here in Section 1.7, it states that
19 "Whenever the level of performance falls below
20 acceptable limits, supervisors/superior officers are
21 responsible for initiating disciplinary action if the
22 employee is assigned to their command."

23 A Okay.

1 Q And so you agree that this would apply to you as
2 chief?

3 A Yeah.

4 Q And you would have the responsibility for initiating
5 disciplinary action if employees under your
6 command -- if their performance was falling below
7 acceptable limits?

8 A Yes.

9 Q Scrolling down a little bit, the manual explains the
10 difference between positive discipline and formal
11 discipline. And if you'd like to take a moment to
12 read that, you can.

13 A Okay.

14 Q And the manual is stating that for deficient
15 performance and for minor violations, a supervising
16 officer may use positive discipline techniques,
17 right?

18 A Yes.

19 Q And what are positive discipline techniques?

20 A I might call them into the office and train them a
21 little bit, tell them what -- how he could better do
22 the job, how if that issue ever arose, he could
23 better handle that issue.

1 Q And then for major violations or when appropriate,
2 the superior officer must invoke the formal
3 discipline procedures, right?

4 A Right.

5 Q And that could include when there's a string of
6 similar minor violations for the same?

7 A I'm not certain of that.

8 Q Okay. Did you as chief engage in positive discipline
9 with your officers?

10 A On occasion I would have to talk to some of the
11 officers. I would bring them in and tell them
12 exactly that, you might want to do it in a different
13 way, you're good officers, you do good work, but you
14 might want to do it in a different way.

15 Q And can you remember any specific times that that
16 happened with the Strike Force or the Housing Unit?

17 A I recall bringing people in, but I don't remember the
18 specifics of their actions.

19 Q Do you recall whether it would have been officers,
20 lieutenants or captains?

21 A Mostly officers.

22 Q And even if you can't remember the officer's name or
23 the exact date when it happened, can you provide any

1 more detail of the types of incidences where you
2 would have called them in for positive discipline?

3 A Maybe the way they might have talked to somebody,
4 maybe being late for work, something along that line
5 if there was a pattern of that.

6 Q And here it actually might be helpful for us to look
7 at Section E which addresses major versus minor
8 violations.

9 A Okay.

10 Q And it does say that major violations include
11 allegations of criminal conduct, moral turpitude,
12 insubordination, misuse of department property or
13 equipment or repeated documented minor violations of
14 department standards or conduct.

15 And then minor violations could include slovenly
16 appearance, coarse or harsh language, tardiness, poor
17 service.

18 A Okay.

19 Q So I should ask, did you ever recall a time when you
20 experienced repeated documented minor violations of
21 department standards of conduct on the part of any of
22 your officers?

23 A No.

1 Q And moving to Section 3.7, this addresses which
2 command will investigate a complaint. And it
3 provides that for serious allegations, the Internal
4 Affairs Department will investigate the case, but for
5 minor complaints, the employee's command would be
6 designated to investigate those complaints. And was
7 that consistent with your experience when you were
8 chief?

9 A If the call came into Internal Affairs or into the
10 station regarding that, maybe a first line supervisor
11 or the captain would investigate. And then the major
12 ones would go to Internal Affairs.

13 Q And in Section 3.8, "Conducting the Investigation,"
14 it states, "When an employee investigation is
15 assigned to the employee's command, the Chief or
16 superior in charge of that command will be
17 responsible for its completion. The Chief or
18 superior in charge may delegate authority to lesser
19 ranking superior officers of his/her command to
20 pursue the investigation however, the ultimate
21 responsibility for its completion rests with the
22 Chief or superior in charge."

23 Is this consistent with how you recall your

1 practice when you were chief in dealing with
2 complaint investigations?

3 A Generally, the first or second line supervisor would
4 handle the initial, and ultimately it is the chief
5 who would make the determination.

6 Q I'm sorry. Could you just repeat that?

7 A If a minor complaint came in, maybe a lieutenant or a
8 captain would handle that initially. And then
9 ultimately, it would come to me or the chief to
10 handle that issue if it rose to that level.

11 Q So you agree that you retained the ultimate
12 responsibility to -- for investigations of Housing
13 Unit and -- sorry. Scratch that.

14 You agree that you retained the ultimate
15 responsibility for investigations of complaints
16 against Housing and Strike Force officers?

17 A Yes.

18 MR. POOLE: Form.

19 Q Let's go back to the Manual of Procedures one more
20 time. And looking at Section 2.4, which covers IAD
21 investigations, and it states here that
22 "Investigations that are particularly complex or that
23 involve allegations of discrimination based on race,

1 color, religion, sex or national origin, or that
2 involve allegations of sexual harassment, shall be
3 investigated by IAD."

4 Did you ever have occasion to observe that IAD
5 had inappropriately assigned the investigation of a
6 complaint involving allegations of racial
7 discrimination to you instead of investigating it
8 themselves?

9 MR. POOLE: Form.

10 A No.

11 Q In instances where you're required to conduct an
12 investigation, what investigatory procedure were you
13 supposed to follow?

14 A Like I said, initially, the lieutenant or captain
15 might take it, speak to whomever is making the
16 complaint, and then I believe they would report to me
17 but --

18 Q Was there any guidance for -- actually, let me back
19 up.

20 It would be Captain Roberts and then Captain
21 Serafini who was primarily responsible for
22 investigating these complaints, right?

23 A Well, it might have gone to a lieutenant and then to

1 a captain.

2 Q I see. Was there any guidance to the captains or
3 lieutenants about what they should do when
4 investigating a complaint?

5 A I think if they could handle it at their level, they
6 would handle it at their level. If it morphed into
7 something more, it might come to me and then
8 ultimately to Internal Affairs.

9 Q And who would make the determination of whether it
10 could be handled at their level or not?

11 A Are you talking the captains or lieutenants?

12 Q Either one. Let's start with lieutenants.

13 A If it could be handled at his level, he would handle
14 it. He could make that determination.

15 Q And what would handling it mean?

16 A He might talk to the officer. He might bring him in
17 and say you need to be on time. Whatever the issue
18 is, he could talk to him.

19 Q And in this case, we're speaking about complaints
20 that are filed against BPD officers by members of the
21 general public. So it wouldn't be an issue of
22 lateness or uniforms, but it would be a citizen
23 complaint.

1 A So are those being filed in -- with the Internal
2 Affairs Division?

3 Q Well, my understanding of the process -- and you can
4 tell me if it happened differently from this in your
5 experience -- was that complaints would be sent to
6 the Internal Affairs Division, and then Internal
7 Affairs would decide whether to investigate it
8 themselves or whether to ask the employee's command
9 to investigate.

10 A Yeah, that's -- that could happen, yes. If the
11 report was made with Internal Affairs, then they
12 would make the determination up there as to who's to
13 handle it. So it's very possible that we would get a
14 memo or a P-73 regarding an incident where they would
15 say would you speak to your officer.

16 Q And so when the -- so if it was -- in that case where
17 the complaint was coming through Internal Affairs but
18 then given to you for investigation -- and I
19 understand that you delegated that investigation --
20 would it be done by lieutenants or by the captain?

21 A Both. Either or both. It might go to the captain
22 first.

23 Q And was there any guidance for the captain or the

1 lieutenants in terms of how to conduct the
2 investigation?

3 MR. POOLE: Form.

4 A No, nothing formal.

5 Q And did you see your role as just determining the
6 right outcome, or were you also responsible for the
7 quality of the investigation itself?

8 MR. POOLE: Form.

9 A Oftentimes, there were minor complaints that the
10 captain and lieutenant would handle. A lot of times
11 it was simply just a matter of speaking with the
12 officer and hopefully that their behavior would
13 change.

14 Q And I'm going to go back to just look at one more
15 section here. This is about conducting the
16 investigation, and I want to look at 3.8(E). It
17 says, "All superior officers in the employee's chain
18 of command will submit in writing their
19 recommendations concerning the disposition of the
20 case. In cases of citizen complaints this will be
21 done on Form P-294b. For non-citizen complaints the
22 recommendations will be forwarded on in
23 Intra-Departmental memorandum."

1 And do you know what would be the difference
2 between citizen complaints and non-citizen
3 complaints?

4 MR. POOLE: Form.

5 A Citizen -- I would -- that's the general public.
6 Non-citizen, I'm assuming it's an employee of the
7 police department.

8 Q Uh-huh. Was there a Form P-294b? Was that used?

9 MR. POOLE: Form.

10 A I don't know that I ever saw it.

11 Q And does this mean that as the superior officer in
12 the employee's chain of command that you personally
13 had an obligation to submit a recommendation in
14 writing concerning the disposition of the case?

15 MR. POOLE: Form. In which case?

16 MS. WILNER: Any case. Any case that
17 was being investigated.

18 A It does state that all superior officers should make
19 a written recommendation.

20 Q Was it your practice to make written recommendations?

21 A I don't recall making them.

22 Q Was this requirement met by having you forward or
23 sign off on the recommendation that would be made by

1 the investigating officer?

2 A He would file a P-73 that might require a
3 recommendation. That would be forwarded to Internal
4 Affairs.

5 Q If a captain prepared a P-73 with a recommendation
6 and the captain would send that to you, what would
7 you then do?

8 A I would forward that to Internal Affairs generally.

9 Q Would you read it before you forwarded it?

10 A Yes.

11 Q Would you ensure that you were satisfied with the
12 quality of the investigation?

13 MR. POOLE: Form.

14 A Yes.

15 Q And would you ensure that you agreed with the
16 recommendation?

17 MR. POOLE: Form.

18 A Yes.

19 Q Did it ever happen that you thought an investigation
20 was deficient?

21 MR. POOLE: Form.

22 A Not that I recall.

23 Q Did it ever happen that you disagreed with a

1 recommendation?

2 A Not that I recall.

3 Q How often did you receive complaints against Housing
4 Unit and Strike Force officers that needed
5 investigation?

6 A I don't recall. I don't recall.

7 Q Can you say whether it was once a week, once a month,
8 multiple times per week?

9 A I have no way to. It wasn't frequent.

10 Q In your memory, it was not frequent?

11 A Right, in my memory.

12 Q I'll mark as Brinkworth 35 a document identified as
13 COB347125, and this is an email chain between you and
14 Captain Roberts. It's dated September 4, 2013. So
15 in this email, Captain Roberts is discussing
16 unauthorized use of Strike Force and Housing Unit
17 vehicles and you then responded to the email, right?

18 A Yes.

19 Q Captain Roberts specifically states, "We receive
20 enough complaints from citizens who see 'Strike
21 Force' and 'Housing' written on the side of the
22 vehicles without officers patrolling in these
23 vehicles without our knowledge."

1 As chief, were you concerned that Strike Force
2 and Housing Unit officers received an excessive
3 number of citizen complaints?

4 MR. POOLE: Form.

5 A I don't know how you define "excessive," but there
6 were complaints that came in. But I don't know how
7 excessive they were.

8 Q Were there more complaints against Strike Force and
9 Housing Unit officers than there were against A
10 District officers?

11 A Yes.

12 Q And was it a little bit more, a lot more, twice as
13 much? Can you quantify the difference?

14 A I don't know the difference, no.

15 Q But enough so that you noticed there was a
16 difference?

17 A I would say just because they had more contact --
18 Strike Force had more contact and Housing worked with
19 people, so I would think that they did. I don't know
20 the numbers though.

21 Q Did you make any effort to try to reduce a number of
22 complaints received by Strike Force and Housing Unit
23 officers?

1 A Again, if a complaint was made at the station house,
2 somebody would handle it, maybe the captain or
3 lieutenant, and we would talk with the officers to
4 hopefully change some behavior.

5 Q Did you have any way of determining whether that was
6 effective?

7 A Just by performance afterwards.

8 Q Do you think it was effective?

9 A I would think it -- I would think so at times.

10 Q At times it was effective and at times it was not
11 effective?

12 A I have no way to determine -- I would like to think
13 it was effective, yes.

14 Q I'll introduce as Brinkworth 36 a document identified
15 as COB041829, and this has to do with a complaint
16 investigation. It's an email chain between you and
17 Captain Serafini. It's dated June 30, 2015.

18 A Okay.

19 Q And this would be an example of Internal Affairs
20 forwarding a complaint to you for investigation,
21 right?

22 A Yes.

23 Q And then you asked Captain Serafini to handle the

1 investigation?

2 A Yes.

3 Q And you said, "Unfortunately, we do get many of
4 these."

5 A Yes.

6 Q And what did you mean by that statement?

7 A Meaning we got those types of complaints. I'm not
8 sure of the nature of the complaint.

9 Q We can scroll down and look at the complaint. The
10 complaint is here.

11 A Okay.

12 Q Do you have any additional thought after reading this
13 complaint what you would have meant by
14 "Unfortunately, we do get many of these"?

15 A It could be a rudeness complaint. It could be a
16 matter of him being arrested even though -- because
17 the warrant is still in the system, it has to be
18 cleared. It could be a rudeness complaint or it
19 could just be a general statement regarding
20 complaints. I don't have a number as to how many
21 complaints we would receive or we did receive.

22 Q And were rudeness complaints common?

23 A We would get them. I don't know how common, though.

1 Q And how did you address them?

2 A Oftentimes, I would send it to the lieutenant or
3 captain and they would handle it.

4 Q And did Strike Force and Housing Unit received more
5 complaints than school resource officers?

6 A Yes.

7 Q Did you have a different process for handling
8 complaints against school resource officers than you
9 did against the Housing and the Strike Force?

10 A No.

11 Q Did you ever speak with your commanding officers
12 about the volume of complaints against Housing Unit
13 and Strike Force officers and whether anything could
14 be done to reduce complaints?

15 A Not that I recall.

16 Q Did you ever look into complaints against Housing
17 Unit and Strike Force officers to see if you could
18 detect common patterns?

19 A No.

20 Q If you wanted to do that, would you have been able to
21 do that?

22 MR. POOLE: Form.

23 A State that again, please.

1 Q Yes. If you had wanted to do that, in other words,
2 if you had wanted to look into all the complaints
3 against Housing Unit and Strike Force officers to see
4 if you could detect common patterns, would you have
5 been able to do that?

6 A I think I could have talked with Internal Affairs.

7 Q Did you ever consider sending any of your officers
8 for retraining to address complaints?

9 A No.

10 Q Did you ever attempt to investigate whether
11 complaints came disproportionately from Black and
12 Latinx drivers?

13 A No.

14 MR. POOLE: Form.

15 Q Did you ever attempt to investigate whether
16 complaints came disproportionately from residents of
17 the east side?

18 A No.

19 Q I will go back to the Manual of Procedures, and
20 looking at Section 3.8(C), it states, "All evidence
21 must be thoroughly evaluated and witnesses must be
22 carefully interviewed. Statements of witnesses shall
23 be taken in appropriate cases."

1 Did you ever have occasion to observe that the
2 captains or lieutenants failed to thoroughly evaluate
3 the evidence?

4 A Not that I recall.

5 Q Did you ever have occasion to observe that witnesses
6 were not carefully interviewed?

7 A Not that I recall.

8 Q Did you ever have occasion to observe that a witness
9 statement should have been taken but was not?

10 A Again not -- I don't recall that.

11 Q Were you generally satisfied with the quality of
12 investigations performed by Captain Roberts?

13 A Yes.

14 Q Was there ever a time when you felt that his
15 investigation did not meet professional standards?

16 A No.

17 Q Were you generally satisfied with the quality of
18 investigations performed by Captain Serafini?

19 A Yes.

20 Q Was there ever a time when you felt his investigation
21 did not meet professional standards?

22 A No.

23 Q What was your practice when your officers and the

1 complainants gave a different account of the facts?

2 A I just need you to repeat, please.

3 MR. POOLE: Could you repeat the
4 question, please?

5 (Record read by reporter.)

6 A I don't recall how I handled it. They're individual
7 cases. A lot of times we try to get them settled
8 right in the station house if we could. And other
9 times, if they weren't satisfied, they would go up to
10 Internal Affairs.

11 Q So we're talking about the situation in which
12 Internal Affairs is asking you to investigate a
13 citizen complaint that has been filed against an
14 officer and --

15 MR. POOLE: As chief, as a lieutenant?
16 Any particular time frame we're discussing
17 here? Any particular instances that we're
18 discussing here? Is there a narrowing that
19 we could construe the question to, please?

20 Q Well, I'm talking about your general practices as
21 chief, because we agreed that you have the ultimate
22 responsibility for these investigations, right?

23 A They flow through me. If it raises to the level

1 where Internal Affairs is involved, they would
2 ultimately have it. But if we can settle the issue
3 at the district or precinct level, then we would
4 settle it there. If not, it would go to Internal
5 Affairs.

6 Q And if Internal Affairs sends a complaint to you for
7 investigation and then you then give that complaint
8 to your captain or your lieutenant to handle the
9 investigation, you retain the ultimate authority for
10 the investigation, right?

11 A Yeah, yes.

12 Q So my question is in the course of those
13 investigations, when the officers and the
14 complainants disagreed about what happened, how were
15 those disagreements resolved?

16 A Try to find common ground. They didn't happen very
17 often where I had to actually intercede with these,
18 but we try to find some common ground and hopefully
19 satisfy the complaint.

20 Q Was it generally your practice to believe the
21 officer's version of events over the complainant's
22 version of events?

23 MR. POOLE: Form.

1 A I can't say with specificity based on there's so many
2 different factors with these complaints, so I would
3 have to listen to both sides of these complaints.

4 Q Were you called upon to make credibility
5 determinations in the course of the investigation
6 process?

7 A I think you're always called on. If you have people
8 involved, you've got to determine credibility, I
9 would believe.

10 Q And so how would you make these credibility
11 determinations?

12 A I have to talk to the people, determine what they
13 did, what they're saying, talk to both -- talk to the
14 officer and hopefully make a determination as to who
15 is -- who may be right if they both perceive the
16 issue differently. So it may come down to a matter
17 of just misperceptions from both sides. So if we can
18 resolve that issue where both parties are satisfied,
19 then we can resolve it that way.

20 Q Was the officer's disciplinary history a factor in
21 resolving credibility determinations?

22 MR. POOLE: Form.

23 A No.

1 Q When you were investigating a complaint, did you have
2 access to the officer's disciplinary history?

3 A No.

4 Q And if you delegated the investigation to Captain
5 Roberts or Captain Serafini or lieutenants, would
6 they have access to the officer's disciplinary
7 history?

8 A No.

9 Q Can you recall a time when Captain Roberts or
10 Serafini or a lieutenant recommended that a complaint
11 be sustained?

12 A No.

13 Q And can you recall a time that you recommended that a
14 complaint be sustained despite a recommendation from
15 a captain or lieutenant to the contrary?

16 A No.

17 MR. POOLE: Form.

18 Q Did you ever recommend that officer receive
19 additional training in any area?

20 A Not that I recall, no.

21 Q When you made a recommendation as to the disposition
22 of a particular complaint, did you ever find out
23 whether that recommendation was accepted?

1 A I don't know if they sent us something, but I don't
2 know if there was -- if we were supposed to address
3 it with some type of punishment or discipline, we may
4 have gotten something back from Internal Affairs to
5 bring them in and have a conversation with them.

6 Q If you got a notice from Internal Affairs, say, for
7 example, that an officer was to appear for an
8 informal hearing or an informal conference, would you
9 know what incident that hearing or conference was
10 related to?

11 MR. POOLE: Form.

12 A I don't recall the particulars, if they would have
13 provided that.

14 Q And when Internal Affairs was investigating a
15 complaint against an officer that was under your
16 command, that would be for a more serious allegation,
17 right?

18 MR. POOLE: Form.

19 A Yes.

20 Q As chief, would you be informed of the nature of the
21 allegations against the officer?

22 A At some point, I probably would have received some
23 information.

1 Q Did you have a role in the investigation process when
2 IAD was conducting the investigations?

3 A No.

4 Q And at the end of the process, would you be informed
5 of the disposition of the complaint?

6 A Yes.

7 Q If the officer was sent to an informal conference,
8 would you be informed of that?

9 A Yes.

10 Q Did you participate in the informal conferences for
11 Housing Unit and Strike Force officers?

12 A Yeah, I would. I would have. I don't necessarily --
13 I don't know if it's every one that I would have, but
14 I would have participated in some of them.

15 Q And just to be clear --

16 A Or unless it's -- if it's -- it might have been sent
17 to a deputy commissioner, so I would not have been in
18 that role.

19 Q Right. So if they were sent to a deputy
20 commissioner, it would be just the deputy
21 commissioner and the officer?

22 A Yes.

23 Q As chief, did you have access to the disciplinary

1 records of the officers under your command?

2 A That I don't know. I don't know if I would have had
3 them.

4 Q Would you have liked to have access to them?

5 A Excuse me?

6 MR. POOLE: Form.

7 Q Would you have liked to have access to the
8 disciplinary records of the officers under your
9 command?

10 MR. POOLE: Form again.

11 A In a minor event, I don't know that I would
12 necessarily need them, but again I had Internal
13 Affairs handle the bigger issues.

14 Q Do you think that you would have been a more
15 effective supervisor if you had more information
16 about the disciplinary records of the officers under
17 your command?

18 MR. POOLE: Form.

19 A Probably.

20 Q And can you explain a little more about that would
21 have helped you be a better supervisor?

22 MR. POOLE: Form.

23 A If I had their records, obviously if you see a

1 pattern, you might be able to preempt some of their
2 behaviors.

3 Q I'll mark as Brinkworth 37 a document identified as
4 COB053645. And this is a three-page email chain
5 regarding a complaint by Delwanda Garland.

6 A Okay.

7 Q And we can scroll down to the complaint. I'll let
8 you read it. The date of the complaint was
9 August 27, 2014.

10 A Okay.

11 Q And I'll let you finish.

12 A Okay.

13 Q So looking at this complaint, do you agree that Ms.
14 Garland was initially stopped without any
15 individualized suspicion as part of the process of
16 going through the checkpoint?

17 MR. POOLE: Form.

18 A It sounds like she went through a checkpoint.

19 Q Correct. And I'm just -- I'm hoping that this is not
20 a controversial point, but everybody who goes --
21 passes through a checkpoint is stopped, right?

22 They're under the --

23 A Yes.

1 Q Yes. And they're stopped without any individualized
2 suspicion of wrongdoing?

3 A Correct.

4 Q But --

5 MR. POOLE: Form again. Sorry.

6 Q In order to pull a driver over for a secondary stop,
7 the officer would have to have probable cause that
8 the driver had committed a crime or a traffic
9 violation, right?

10 A Yes. But in this instance, it appears that she was
11 not cooperating. She said her vehicle information
12 were all correct, so if I'm reading this correctly,
13 she didn't provide that.

14 Q Are people driving in vehicles ordinarily required to
15 stop and be stopped and answer questions from
16 officers when they haven't committed any traffic
17 violations?

18 MR. POOLE: Form.

19 A Well, this was a traffic checkpoint, so all the cars,
20 all the officers -- all the motorists were stopped.

21 Q And so it's your testimony that when people are
22 passing through a checkpoint, if an officer wants to
23 pull them over to ask them more questions, that the

1 officer has the right to do that, that the driver
2 can't object even if there's nothing wrong with the
3 driver's vehicle and there's no probable cause that
4 they've committed any traffic violations?

5 MR. POOLE: Form.

6 A Well, if there's no probable cause to -- no, they
7 can't be -- they can't be stopped.

8 Q And so what was the probable -- and I understand
9 we're basing it off this complaint, but based on this
10 complaint, what would be the probable cause for
11 stopping Ms. Garland?

12 MR. POOLE: Form.

13 A I have no idea.

14 Q Can you identify a probable cause?

15 MR. POOLE: Form.

16 A I have no idea. It sounds like she was written for
17 loud music. Perhaps that was it.

18 Q Right. And she disputed whether there was loud
19 music, right?

20 A Yes.

21 MR. POOLE: Form.

22 Q But generally, citizens are free to refuse to
23 communicate with police officers if they want to and

1 they're not under --

2 MR. POOLE: Form.

3 Q -- any formal restraint?

4 MR. POOLE: Form.

5 A Yes.

6 Q Looking at the email chain, up on the first page,
7 Captain Roberts apparently was at this checkpoint.
8 He said, "I was down the street. Dangerous woman.
9 Lance said he was expecting complaint. We will
10 answer it."

11 What did he mean by that comment, "Dangerous
12 woman"?

13 MR. POOLE: Form.

14 A I don't know.

15 Q What -- do you have an opinion on what you think he
16 might mean?

17 A No.

18 MR. POOLE: Form.

19 Q How did you interpret that when you read it?

20 MR. POOLE: Form.

21 A That was eight years ago. I don't recall.

22 Q Do you think that's an appropriate way to speak about
23 a member of the public who's just filed a complaint?

1 MR. POOLE: Form. Who are you referring
2 to?

3 MS. WILNER: I'm referring to Captain
4 Roberts' characterization of the complainant
5 as a dangerous woman, and I'm asking whether
6 Mr. Brinkworth thinks that that is an
7 appropriate way to speak about the
8 complainant.

9 MR. POOLE: Form.

10 A I don't know what he was referring to in terms of
11 dangerous. That might have been the opinion that he
12 had of this woman depending on her actions.

13 Q In this case, he almost seems to be viewing himself
14 as defending against the complaint rather than in his
15 role as an investigator, don't you think?

16 MR. POOLE: Form.

17 A I don't know what his motivation was.

18 Q And then you responded, "Ok. Thank you. She warned
19 a kid about the roadblock. Nice lady." What did you
20 mean by that?

21 A Well, I must have been told that she warned a kid
22 about the upcoming roadblock and the kid turned off
23 and the nice lady might -- that might have been a bit

1 of sarcasm.

2 Q And I'm going to introduce Brinkworth 38, COB053881.

3 And this is the P-73 that Captain Roberts prepared in
4 connection with the complaint. So I'll give you a
5 minute to read that.

6 A Okay. Can you move it up, please? Okay.

7 Q Okay. So you received this P-73, right?

8 A Yes.

9 Q And you signed off on it?

10 MR. POOLE: Form.

11 A I don't see any signature there.

12 Q Well, it says, "Respectfully forwarded, Chief Kevin
13 Brinkworth." What does that mean to you?

14 A Usually, my signature would be attached, but that
15 would mean it passed through me and I would have --
16 it would have been sent up to Internal Affairs.

17 Q Does that mean you're approving and standing behind
18 the contents?

19 A Yes.

20 Q So Captain Roberts is agreeing in the P-73 that Ms.
21 Garland was pulled over for a secondary stop at a
22 checkpoint because she had been seen speaking to a
23 person who the officer believed was involved in the

1 drug trade, right?

2 A That was one reason given, but it was also she
3 created the impression she was avoiding passing
4 through the checkpoint.

5 Q But then she did pass through the checkpoint?

6 A But then she did pass through.

7 Q Is there anything illegal about speaking to a person
8 who is walking on the street?

9 A No.

10 Q Even if that person is a suspected drug dealer?

11 A No.

12 Q Does speaking to a suspected drug dealer standing
13 alone give rise to probable cause that a crime is
14 afoot?

15 A No.

16 Q Does speaking to a suspected drug dealer standing
17 alone give rise to a reasonable suspicion that a
18 crime is afoot?

19 A Again, the circumstances might dictate if they
20 believed that was the transaction that occurred.

21 Q Well, they didn't say they witnessed a transaction in
22 Ms. Garland's instance, right?

23 A Right.

1 Q Given that Ms. Garland passed through the checkpoint
2 and there was nothing wrong with her vehicle and she
3 had done nothing wrong, didn't she have the right to
4 refuse to answer the officer's questions?

5 MR. POOLE: Form.

6 A I was not there, so I cannot say any certainty in
7 that instance why she refused to answer.

8 Q Wasn't it her right as a citizen to refuse?

9 A If she passed through and there was no reason to stop
10 her, I believe she did not have to answer.

11 Q So did the officer act correctly in pulling Ms.
12 Garland over based on her not wanting to answer
13 questions?

14 A I can't say. I cannot say because I don't have
15 enough information. I have this in front of me.
16 That's all I have.

17 THE WITNESS: Can we take a break for
18 five minutes?

19 MR. POOLE: It's fine by me. It's
20 almost three o'clock.

21 MS. WILNER: Yes. If you don't mind,
22 I'd like to just finish the questions I have
23 about this incident and then we can take our

1 break.

2 THE WITNESS: Okay.

3 MR. POOLE: Is that question
4 forthcoming?

5 MS. WILNER: No. We can go ahead and
6 take our break. That's fine.

7 (A recess was taken.)

8 BY MS. WILNER:

9 Q I will mark as Brinkworth 39 a document labeled
10 COB053865. It is an email chain between you and
11 Captain Roberts on December 15, 2014, and the subject
12 is "Potential Complaint." And I will scroll down so
13 that you can read the basis for the potential
14 complaint.

15 A Can you move up? Okay.

16 Q So in this email, Captain Roberts describes that
17 officers attempted to make a traffic stop, but by the
18 time they approached the vehicle, it was parked and
19 the driver had exited the vehicle; is that correct?

20 A Yeah.

21 Q Next Captain Roberts states that the officers learned
22 from the driver that the driver had no license, but
23 since he had entered a private home, they could not

1 reach him. Agree?

2 A Yes.

3 Q And the officer then proceeded to impound the parked
4 vehicle?

5 A Yes.

6 Q In your opinion, was this a lawful impound?

7 MR. POOLE: Form.

8 A I don't know who the car was registered to.

9 Q Well, if we read a little further down, there was
10 another person who was the owner of the vehicle --

11 A Okay, okay. Yes. I'm sorry. I missed that. Was
12 that -- again, I don't know all the issues here. I
13 don't know if there -- for what reason was it
14 impounded. I don't know.

15 Q I'm asking you for what --

16 A And I'm telling you I don't know based on this
17 information. There could be other reasons why it
18 was -- I don't know. If you're asking me based
19 solely on this, I can't make a judgment based on
20 this.

21 Q There's a limited universe of reasons why a vehicle
22 can be impounded, right?

23 A Right.

1 Q We looked at them before in the Manual of Procedures.
2 Do any of those reasons apply here?

3 A Is it possible he was blocking -- the car was
4 blocking an intersection?

5 Q Does it state that the car was blocking an
6 intersection?

7 A It does not.

8 Q Captain Roberts admitted that the officers were not
9 able to enforce any laws regarding the incident,
10 right?

11 A Yes.

12 Q So this is a scenario where a parked vehicle was
13 impounded and no arrests could be made or violations
14 issued. Does that sound like a lawful impound to
15 you?

16 MR. POOLE: Form.

17 A Not based on that.

18 Q Captain Roberts then received a call from the owner
19 of the vehicle, and it sounded like Captain Roberts
20 was not agreeing to release the vehicle unless the
21 vehicle owner would tell him who was driving the
22 vehicle. Is that your interpretation?

23 MR. POOLE: Form.

1 A Would you pull that up, please? No, the other way.
2 A little bit more. I can't -- I need the second
3 page.

4 I just see where he said he would update him on
5 the status of the vehicle.

6 Q Well, since the vehicle was unlawfully impounded,
7 shouldn't it have been released to the owner
8 regardless of whether the owner could tell him who
9 was driving the vehicle?

10 MR. POOLE: Form.

11 A Yes.

12 MR. POOLE: Am I reading this correctly,
13 though, that it was a call over a phone from
14 the owner, who misidentified himself and was
15 this adjudicated in one way or another?

16 MS. WILNER: This is my deposition.

17 MR. POOLE: And was there a
18 determination that there was an unlawful --

19 MS. WILNER: Excuse me. This is an
20 improper speaking objection. I'm the person
21 who's asking the questions in this
22 deposition.

23 MR. POOLE: I wasn't objecting. I just

1 couldn't tell from what I was reading. It's
2 so small.

3 MS. WILNER: Okay. If you need me to
4 blow up the size of the print so that you can
5 read it better, I'm happy to do that, but
6 please refrain from commenting on the
7 contents of the documents.

8 Q Your response to receiving this email was, "Got it.
9 Keep me updated." Did you recommend any disciplinary
10 action for the officers who unlawfully impounded the
11 vehicle?

12 MR. POOLE: Again, form.

13 A I don't recall.

14 Q Did you provide any instruction to Captain Roberts
15 about the basis for a lawful vehicle impound?

16 A I don't recall.

17 Q And it doesn't sound like -- it doesn't look like you
18 asked for more information about what happened,
19 right?

20 A That's -- that was my reply.

21 Q I will introduce as Brinkworth 14 -- excuse me -- 40
22 a document identified as COB053611, and this is dated
23 October 28, 2013. It's a P-73 prepared by Patrick

1 Roberts. If we look at the second page, he submitted
2 it and you also put, "Respectfully forwarded" at the
3 bottom. And now I will let you read the document.

4 A Okay. Please push it up. Okay.

5 Q Okay. So I will direct your attention to this part
6 right here. (Indicating.)

7 A Okay.

8 Q Captain Roberts reports Mr. Gulledge's allegation is
9 he was, quote, stopped solely because he is Black.

10 A Okay.

11 Q You received this P-73, correct? You read this?

12 A I can't say with any certainty. Yes, I must have.

13 Q Yes. And --

14 MR. POOLE: Form of the question,
15 please. Thank you.

16 Q Why did you not ask IAD to take over the
17 investigation based on Mr. Gulledge's allegation of
18 racial discrimination?

19 MR. POOLE: Form.

20 A It appears it was resolved to Mr. Gulledge's
21 satisfaction.

22 Q Doesn't the Manual of Procedures require that
23 complaints of racial discrimination be investigated

1 by IAD?

2 MR. POOLE: Form.

3 A Mr. Gullledge could have made a complaint at
4 headquarters also. But it seems -- it seems it was
5 taken -- it seems it was -- satisfied Mr. Gullledge.

6 Q According to Captain Roberts?

7 A Yes.

8 Q My question was: Doesn't the Manual of Procedures
9 require that complaints of racial discrimination be
10 investigated by IAD?

11 A It does state that.

12 Q In this case, Captain Roberts closed the complaint
13 without investigating the claim of racial
14 discrimination, right?

15 MR. POOLE: Form.

16 A I don't know what the conversation was between
17 Mr. Gullledge and Mr. -- Captain Roberts.

18 Q Well, Captain Roberts, in order to investigate the
19 claim of racial discrimination, would have at least
20 had to speak to the officers, right?

21 MR. POOLE: Form.

22 A If he conducted an investigation, yes.

23 Q And he does not say that he spoke to the officers,

1 does he?

2 A Not in this, no.

3 Q And he does not resolve the question about whether,
4 in fact, Mr. Gullledge was stopped because of his
5 race, right?

6 A Not according to this, no.

7 Q And you approved this recommendation to consider the
8 complaint closed without investigation of the
9 discrimination allegation, right?

10 A Yes.

11 Q Captain Roberts reported that two different Strike
12 Force officers had issued multiple tinted windows
13 tickets in a single stop, right?

14 A Yes.

15 Q Did you instruct Captain Roberts to ensure that
16 officers issued only one tinted window ticket per
17 stop?

18 MR. POOLE: Form.

19 A I don't recall.

20 Q Mr. Gullledge also alleged that the officer issued
21 unjustified tickets for seat belts and the GPS
22 device, right?

23 A Yes.

1 Q And Captain Roberts did not investigate whether the
2 officer, in fact, had a reasonable basis for issuing
3 those tickets, did he?

4 MR. POOLE: Form.

5 A Not according to this.

6 Q And you signed off on it even though this part of the
7 investigation was left, you know, without any
8 conclusion, right?

9 A It was apparently forwarded through me, yes.

10 Q And Captain Roberts stated that if Mr. Gullledge felt
11 that the tickets were unjustified, he could go to
12 court?

13 A Yes.

14 Q Do you agree with that point of view?

15 A Well, if it was issued, then he has to respond to it
16 in court and state his case.

17 Q Do you think it's acceptable for Buffalo Police
18 Department officers to issue unjustified tickets with
19 the excuse that the person can always go to court?

20 MR. POOLE: Form.

21 A If it's a justified -- if it's a justified ticket and
22 he wishes to contest it, he can go to court.

23 Q Correct. In this instance, though, the allegation in

1 the complaint is that the ticket was not justified.
2 So shouldn't the investigation have looked into
3 whether the officers were issuing unjustified
4 tickets?

5 A That was Mr. Gullede's claim, that it was
6 unjustified. He's the aggrieved party in this. He
7 has his recourse through the courts, and I don't know
8 the disposition of this.

9 Q Isn't it your job as chief and commanding officer to
10 ensure that your officers are issuing tickets that
11 are justified?

12 A Yes.

13 MR. POOLE: Form.

14 Q Shouldn't the complaint of unjustified tickets have
15 been investigated?

16 A If he was found guilty at trial, wouldn't that have
17 been justified?

18 MR. POOLE: Sorry. Luanne, can you read
19 back the question, please?

20 (Record read by reporter.)

21 Q Can you answer the question, please?

22 A Yes, if they're unjustified.

23 Q So for the next set of questions, I'm going to focus

1 on a series of complaints that were made against
2 Officer Robbin Thomas, who's a Strike Force officer.

3 A Okay.

4 Q And I want to state that these are not all the
5 complaints against Officer Thomas, but they are some
6 that we have identified from emails that were
7 produced by your counsel in which you were involved
8 in the investigation. So Brinkworth 41 is identified
9 as COB053865.

10 A Is this the same as the previous?

11 Q Oh, look at that. I suppose so. There were some
12 issues with the numbering that came with the
13 documents that were produced from the City of
14 Buffalo, so maybe this is part of that. Let me
15 just -- oops, this is the wrong exhibit.

16 Hold on. I may need -- let me just look at it
17 again. I may need to fix this. Sorry. I think I
18 will go on and come back to this one when we sort it
19 out. Excuse me for a second.

20 So this will be 42, and it's COB054572. And
21 this is a complaint that went to you on August 8,
22 2013. The complainant was Tracey Richards. And I
23 will let you read that, and then I'll introduce the

1 second exhibit.

2 A Okay.

3 Q So in this complaint, Ms. Richards is complaining
4 that Officer Thomas took her son, along with others,
5 to the Strike Force office for questioning and
6 confiscated their phones. Her son's phone was then
7 lost. And when Ms. Richards tried to follow up, Ms.
8 Thomas was essentially rude and non-responsive. Do
9 you agree with that summary?

10 MR. POOLE: Form.

11 A I see that she said, "What do you want me to do?" I
12 understand the non-responsive part. I'm not sure
13 what her demeanor was.

14 Q And by the way, was this the incident that led to
15 Strike Force officers not being allowed to take
16 witnesses to the Strike Force office for questioning?

17 MR. POOLE: Form.

18 A I don't know.

19 Q So Brinkworth 43 is identified as COB056434, and this
20 is the P-73 that Patrick Roberts prepared for the
21 Richards complaint.

22 A Okay.

23 Q So apparently, there were complaints of rudeness by

1 Officer Thomas because Captain Roberts says, "As for
2 the complaints of rudeness by PO Thomas, I explained
3 to Ms. Richards that the officer was merely being
4 firm with her."

5 And then it -- and then Captain Roberts blamed
6 Ms. Richards' son or one of the other people he was
7 with for the missing phone. But wasn't it the
8 responsibility of the Buffalo Police Department to
9 secure the phone and then see that it was returned to
10 its owner?

11 A Yes.

12 Q In your opinion, did Captain Roberts handle this
13 complaint appropriately?

14 MR. POOLE: Form.

15 A In terms of the phone, it was misplaced somehow. I
16 don't know the -- I don't know that there was any
17 malice intended here or theft but -- and I don't know
18 how this was resolved.

19 Q Okay. And I apologize. I just need a second to deal
20 with some technical issues.

21 Okay. I'm sorry about that. I'm ready to go
22 again.

23 So this will be Brinkworth 44. It's COB421294,

1 and this concerns a complaint -- it's an email
2 concerning a complaint filed by -- actually two
3 complaints from Lajamie Smith and Evelyn Owens. I
4 will let you read the complaint.

5 A Okay.

6 Q Okay. So these complaints were made in May 2013, so
7 just about three months before the phone complaint
8 that we just discussed. And the complaints were
9 having to do with the behavior of Officer Thomas at a
10 traffic stop. She was described as very rude,
11 disrespectful and nasty. Do you remember anything
12 about these complaints?

13 A No.

14 Q At the time did it concern you that two separate
15 individuals were complaining about Officer Thomas's
16 rudeness at a traffic stop?

17 A I don't recall what I thought at the time.

18 Q Sitting here today, do you think that this is the
19 type of complaint that would concern you?

20 A Again, this is taken from two people that are making
21 these claims. Based solely on that, I really can't
22 make an opinion. Officer Thomas is a very
23 matter-of-fact person. She's -- she takes her job

1 serious.

2 Q Brinkworth 45 is identified as COB054155. It's a
3 P-73. This is also from August 2013. This is a
4 complaint that's filed by Phyllis Williams. It
5 pertains to Officer Thomas. And I will let you read
6 the complaint.

7 A Okay.

8 Q So this particular complainant alleged that Officer
9 Thomas told him that if he -- essentially if he
10 didn't want to wear a seat belt, quote, then you
11 should have put your fat ass in the backseat.

12 MR. POOLE: Is that a question? I
13 apologize.

14 Q According to Captain Roberts, Officer Thomas denied
15 the allegations and Mr. Roberts said that the
16 allegations were, quote, out of character and
17 recommended that the investigation be closed and
18 Officer Thomas, quote, removed from the cloud of
19 suspicion, correct?

20 A I'm not -- where do you see that?

21 Q Here's --

22 A Oh, okay. I'm sorry.

23 Q -- "removed from the cloud of suspicion"--

1 A Okay. Yeah.

2 Q -- "out of character." (Indicating.)

3 A Okay. And he also stated that he was not armed with
4 enough information to complete the investigation.

5 Q Right. He did not attempt to interview the other
6 witnesses in the vehicle, did he?

7 A I don't know.

8 Q Well, he doesn't state that he tried to reach them
9 in, does he?

10 A That's not in this P-73, no.

11 Q And although he said that the allegations were out of
12 character, we just saw that just in the last three
13 months prior to this allegation, there were three
14 other allegations that Officer Thomas had treated
15 people rudely, right?

16 A Allegations, yes.

17 Q What role should the prior allegations of rudeness
18 have had in evaluating this particular claim of
19 rudeness?

20 MR. POOLE: Form.

21 A Again, these are allegations, and Ms. Thomas is a
22 very matter-of-fact person. She does her job, and
23 she's matter of fact. Some people do not like her

1 approach, so she's had some complaints.

2 Q Do you think that Captain Roberts performed a
3 sufficient investigation of this complaint?

4 MR. POOLE: Form.

5 A Based on this -- and I don't know whether he
6 attempted to contact others, but perhaps he should
7 have tried to contact the others.

8 Q I'll mark this Brinkworth 46, a document identified
9 as COB054205. This complaint is from October 2013.
10 It is made by a person named Germaine Scott. It has
11 to do with Officer Thomas.

12 Are you ready?

13 A Yeah.

14 Q So just to get us on the same page, Mr. Scott alleged
15 that Officer Thomas stopped him for an alleged seat
16 belt violation and then issued him a summons for
17 driving on a suspended license when the suspension
18 had only gone into effect that same day and then
19 impounded his vehicle and took his driver's license.
20 And then without his identification, he could not
21 retrieve his vehicle from the impound lot, and he had
22 no transportation to get back and forth to work.

23 Is that an accurate summary of the complaint?

1 A Yeah, yes.

2 Q Do you believe the impound, as described in this
3 complaint, is consistent with the BPD's impound
4 policy?

5 MR. POOLE: Form.

6 A He was suspended, and I don't know what the charge
7 was. It says his license was suspended. Whether or
8 not it happened the very same day, his license was
9 suspended, and I don't have the charge.

10 Q So if the suspension -- I see. So you're saying if
11 he had been charged with driving on a suspended
12 license in the first or second degree, then the
13 impound would be lawful?

14 A Yes.

15 Q Let's assume that wasn't the charge. If that was not
16 the charge, was there a lawful basis for the impound?

17 MR. POOLE: Form on assuming anything.

18 A Not under 511-b(1), (2).

19 Q And may an officer confiscate a person's driver's
20 license when it has been suspended, not revoked?

21 A That I'm not sure of.

22 Q Brinkworth 47 is identified as COB053811. This
23 concerns a second complaint filed by Mr. Scott about

1 the same incident, and you can go ahead and read it.

2 A Okay.

3 Q So Mr. Scott is described as beside himself because
4 at this point, four days at least have gone by. He
5 still doesn't have his license. He can't cash his
6 check, which means he can't pay his bills or his
7 rent. He can't get his vehicle from the impound.
8 And he says that he has been attempting to contact
9 Officer Thomas and she's not returning his calls and
10 never is available.

11 Is -- was Officer Thomas's behavior of taking
12 the license and then dodging calls and not returning
13 it consistent with BPD standards of conduct?

14 A I do not know why she would not have called him back.
15 It's possible that he was not -- she was not working.
16 As far as the license, I said I'm not certain that
17 she could confiscate it.

18 Q Did Officer Thomas receive any discipline for this
19 incident?

20 MR. POOLE: Form.

21 A I don't know.

22 Q All right. Brinkworth 48 is an email. It's
23 COB054465, and this is also related to the Scott

1 complaint. This is an email from Patrick Roberts to
2 Stacy Lewis, who I understand is with the Internal
3 Affairs Department.

4 A Yes.

5 Q And Patrick Roberts says, "I spoke to that gentleman
6 and he became very irate with me with no provocation"
7 and also says that he believes Officer Thomas acted
8 properly.

9 Now, would you think that a person in
10 Mr. Scott's position, whose car and license were
11 taken from him likely unlawfully, then not given
12 back, then he can't cash his check, pay his bills or
13 rent or retrieve his car from the impound and is
14 incurring impound fees every day, do you think that
15 that person would have a reason to feel irate?

16 MR. POOLE: Form.

17 A I can only speak to what I would know, and I don't
18 know Mr. Scott. I don't know his demeanor. I don't
19 know his attitude. It would not be -- I would not
20 want to not be able to cash checks, but I don't know
21 the full breadth of this.

22 Q Do you think Captain Roberts has an appropriate
23 attitude to the scenario that he's being asked to

1 look at?

2 MR. POOLE: Form.

3 A He handled this complaint. He's stating that the man
4 was irate with no provocation. And then he said he
5 would not be able to help him so he would forward his
6 findings later. So if I'm to read this, it appears
7 that he had -- there was no resolution to it at his
8 level.

9 Q And he also says that he believes Officer Thomas
10 acted properly, but we've identified that it's likely
11 that she did not act properly, right?

12 MR. POOLE: Form.

13 A I don't -- I have not said that. I don't think she
14 didn't -- again, I'm not certain about the license.

15 Q We're not certain about the license. I would agree
16 with that.

17 A Whether she could confiscate it.

18 Q We did agree that if it wasn't a violation for a
19 511-b in the first or second degree that the impound
20 would have been improper?

21 MR. POOLE: Form.

22 A Yes.

23 Q This will be Brinkworth 49, COB054 -- no wait --

1 054224 -- oh, that's correct. And this is a series
2 of emails around the same time, October 2013. And it
3 has to do with two incidents concerning Ms. Thomas --
4 Officer Thomas.

5 MR. POOLE: Can we call them alleged
6 incidents at this point?

7 MS. WILNER: I will call them
8 complaints.

9 Q I'm going to start with the last page here. This is
10 October 22, 2013. And this is a complaint from
11 Mr. Gregory Saxon.

12 A Okay.

13 Q So in this complaint, Mr. Saxon states that Officer
14 Thomas took his sneakers and his license plates and
15 she destroyed his license plates. And when he asked
16 why, she said, "Because I can." He says that they
17 were valid plates and there was no reason for them to
18 be removed and destroyed.

19 So if the car was properly registered as he
20 states, what would be the basis for removing and
21 destroying the license plates?

22 MR. POOLE: Form.

23 A Again, I don't know that they were -- that the car

1 was registered legally. I don't know that. That's
2 it.

3 Q And I'll also point out the allegation that when he
4 asked why she told him the license plates were
5 destroyed, the response was "Because I can."

6 And stepping back for a minute, we've reviewed a
7 series of complaints against Officer Thomas. There
8 were six separate individuals complaining about her
9 rude behavior all during a span of approximately six
10 months in a single year. You were copied on all of
11 these complaints, right?

12 A Yes.

13 Q Did you do anything to address Officer Thomas's
14 behavior?

15 MR. POOLE: Alleged behavior. Form.

16 A I don't know in these instances, but I had at least
17 one conversation with her about rudeness.

18 Q And was that in this time period?

19 A I don't know if that's when it occurred.

20 Q And what was the nature of your conversation with
21 Officer Thomas?

22 A Again, she's a matter-of-fact person. I don't
23 remember specifically what was said. She's a very

1 matter-of-fact person. She's very straightforward,
2 and she gets complaints because of her attitude
3 sometimes. But I'm not saying her attitude is wrong.
4 I'm saying that's simply sometimes the way she
5 conducts herself because of her nature.

6 Q Don't police officers have an obligation to conduct
7 themselves in a manner so that they're not routinely
8 receiving complaints from members of the public who
9 are interacting with them?

10 MR. POOLE: Form.

11 A Yes. Officers should conduct themselves
12 professionally. However, these are allegations.
13 Some people take umbrage to the way the others act.
14 And she is a very matter-of-fact person.

15 Q Each of the complaints that we looked at, Captain
16 Roberts recommended that the complaints be dismissed.
17 He took the side of Officer Thomas over the side of
18 the complainants in all instances. Having looked
19 more at the complaints and the reports of the
20 investigations that Captain Roberts performed, do you
21 still think he was performing adequate
22 investigations?

23 A I do not have all the information, so I cannot make

1 that assessment.

2 Q What other information would you need in order to
3 make that assessment?

4 A What -- if these all made it to Internal Affairs,
5 what their findings were, if they conducted an
6 investigation.

7 Q So these particular complaints are ones where
8 Internal Affairs directed your -- you, your command,
9 to conduct the investigations. There would not have
10 been an Internal Affairs investigation. This was the
11 investigation.

12 A Well, there was at least one that went -- I'm
13 assuming went back to Internal Affairs.

14 Q Brinkworth 50 is identified as COB056155. This is a
15 P-73 prepared by Captain Roberts. It's dated
16 February 13, 2014. And it has his signature and
17 you're respectfully forwarded at the bottom. And I
18 will let you read the complaint.

19 A Okay. Okay.

20 Q Okay. So returning to the basis for the complaint,
21 Captain Roberts states that Mr. Hardy had pulled his
22 vehicle to the curb and exited the vehicle, at which
23 point Officer Thomas approached and ordered him to

1 get back in his vehicle.

2 A Okay.

3 Q May an officer make a traffic stop when the vehicle
4 is already parked and the driver is exiting the
5 vehicle?

6 A If she had followed him for some period of time and
7 he just pulled over. I don't know what the basis was
8 for him pulling over or her stopping him.

9 Q Would the stop have to be based on probable cause?

10 A Yes.

11 Q Based on the information that Captain Roberts
12 provides in the P-73, was there probable cause to
13 stop the vehicle?

14 MR. POOLE: Form.

15 A Solely on that, no.

16 Q Now, the next part of the narrative explains that
17 after Officer Thomas ordered him to get back inside
18 his vehicle, she then ordered him to step out and to
19 the rear of his vehicle. Would this order have to be
20 based on a reasonable suspicion?

21 A I don't know why she removed him from the car, so I
22 don't know.

23 Q Do you know the standard that applies in order to

1 remove him from the car?

2 A I believe there would -- reasonable suspicion that
3 there's criminality afoot.

4 Q Do you think that standard was met here based on this
5 report?

6 MR. POOLE: Form.

7 A Again, I don't know. I don't know what -- I don't
8 know what the issue was, and I can't say with any
9 specificity.

10 Q Captain Roberts said that it was because there were
11 two prescription medication bottles in plain view.

12 A Okay.

13 Q Do you think that would provide the required level of
14 suspicion to order somebody out of their car?

15 MR. POOLE: Form.

16 A Based solely on prescription bottles, no.

17 Q So as described by Captain Roberts, were Officer
18 Thomas's actions in this stop lawful?

19 MR. POOLE: Form.

20 A Again, I don't know all the particulars. I don't
21 know what the prescription bottles looked like. I
22 don't know what -- I don't know what was in those
23 bottles, so I can't state. I don't know.

1 Q Well, this is Captain Roberts' investigation.

2 A Okay.

3 Q And isn't it his job to do an investigation that's
4 sufficient to enable you to answer those questions?

5 MR. POOLE: Form.

6 A Could you hold on?

7 It's very possible he did it and it just was not
8 memorialized.

9 Q How can an investigation process be functional if you
10 are relying on a probability that an investigation
11 took place but it wasn't memorialized?

12 MR. POOLE: Form.

13 A I'm not certain. I don't know how much was left out
14 and what was included.

15 Q Based on the P-73, are you -- it sounds to me like
16 you're saying that you do not believe that the
17 investigation report is sufficient for you to be able
18 to assess the merits of the complaint.

19 A If you're asking me to make a determination and
20 you're asking me about probable cause, again, I don't
21 know if there's other information that could have
22 been added. I don't know all the particulars, I
23 guess.

1 Q So as a chief and commanding officer reading this
2 report, would you have a concern that your captain
3 and your officer do not have a correct understanding
4 of their legal obligations when stopping citizens?

5 MR. POOLE: Form.

6 A I don't know why they stopped her, so I don't know.
7 I don't know that according to this.

8 Q You didn't look into it further, did you?

9 A I don't recall this event at all. Could you please
10 pull up the --

11 Q This way? (Indicating.)

12 A Yes. I haven't signed it, so I don't know. I don't
13 know.

14 Q It does say, "Respectfully forwarded," and it has
15 "Chief Kevin Brinkworth," right?

16 A Right, it does. But I don't recall seeing this. I
17 don't know.

18 Are we close to being done? I need to make a
19 phone call.

20 Q I believe we are close to being done.

21 MR. POOLE: That could be a very
22 relative value, so could we maybe get more of
23 a determinative answer than maybe, close?

1 MS. WILNER: Yeah. I have three more
2 exhibits to go through. After that, I'm
3 going to want to take a quick break to make
4 sure that I've asked all the questions that I
5 want to ask, so I'm not entirely certain how
6 long it will take us to get through these
7 last three exhibits. Maybe 20 minutes as a
8 guess.

9 MR. POOLE: Mr. Brinkworth, do you need
10 to make a phone call immediately?

11 THE WITNESS: Let me just --

12 MS. WILNER: I can give you a
13 five-minute break if you need to make a phone
14 call now.

15 THE WITNESS: Let me just make -- send a
16 quick text. I'm going to mute you.

17 MS. WILNER: Okay.

18 (Discussion held off the record.)

19 Q This is Brinkworth 51, COB041965. It has to do with
20 a complaint against Officer Thomas. The email chain
21 is dated 7-21-2015, and the complainant was Michelle
22 Smith. I'll let you read the complaint.

23 MR. POOLE: I'll be right back.

1 A Can you hold on for one second?

2 Q Yes. Are we waiting for your counsel? Is that
3 what's happening? I can't hear you. You're on mute.

4 A Yes. He's heading back to his office.

5 MR. POOLE: We're back on the record.

6 Q This is another complaint that Officer Thomas was,
7 quote, rude and nasty at a traffic stop. Captain
8 Serafini was investigating the complaint, and he
9 recommended that the complaint be classified as
10 unfounded. Are we in agreement so far?

11 A Yes.

12 Q But based on the report, it doesn't look like he
13 investigated the issue of Officer Thomas's demeanor
14 at the traffic stop, right?

15 MR. POOLE: Form.

16 A No.

17 Q Does that mean no, he did not investigate Officer
18 Thomas's demeanor?

19 A I thought --

20 MR. POOLE: Form.

21 A -- you said he did not address.

22 Q He did not address the demeanor, correct?

23 A Not according to this.

1 Q Do you think it would have mattered to Captain
2 Serafini to know that there had been at least six
3 prior complaints about Officer Thomas's rudeness?

4 MR. POOLE: Form.

5 A I don't know what the captain would want to know.
6 It's possible that he had already seen complaints.

7 Q Captain Serafini succeeded Captain Roberts, right?

8 A Yes.

9 Q And this would have been relatively soon after
10 Captain Serafini assumed this role, right, in July of
11 2015?

12 A I don't know when Captain Serafini came on board.

13 Q Did you as chief talk to Captain Serafini about
14 Officer Thomas's prior history?

15 A I don't recall.

16 Q Do you recall whether you took any action at this
17 time to address Officer Thomas's behavior?

18 A I don't recall.

19 Q Brinkworth 52 is labeled COB047810, and this is a
20 complaint -- this concerns a complaint. This is
21 October 2015, again concerning Officer Thomas. And I
22 will -- there's nothing helpful at the bottom, so I
23 will let you read Captain Serafini's report of his

1 investigation.

2 A Okay.

3 Q So this was another complaint from a person who
4 alleged that Officer Thomas was rude and
5 unprofessional at a traffic stop, right?

6 A Yes.

7 Q And Captain Serafini observed near the bottom, "In my
8 short time here PO Thomas has had a few similar
9 complaints regarding her traffic stops," right?

10 A Yes.

11 Q He recommended a conference at the captain and
12 lieutenant level in order to address her behavior,
13 right?

14 A Yes.

15 Q Moving on up, we have a response from Inspector
16 McLellan. I'll let you take a minute to read that.

17 A Okay. Okay.

18 Q And Inspector McLellan endorsed the conference.

19 A Yes.

20 Q He said that he had himself written thousands of
21 summons and received complaints very, very rarely.
22 Quote, If handled appropriately a traffic stop does
23 not have to result in a complaint. And you were

1 copied on all of these emails, right?

2 A Yes.

3 Q Did you have any personal role in the conference that
4 Captain Serafini was proposing?

5 A Again, I did have a conference with Officer Thomas,
6 but I don't know if it was at this time.

7 Q It could have been that you had had a conference with
8 her at one point in time and then this was a separate
9 conference?

10 A It's possible that this is the same one, but I'm not
11 certain.

12 Q And Brinkworth 53 is identified as COB047813. And
13 I'm going to focus on the email on top from
14 Inspector Whelan -- excuse me -- Lieutenant Whelan
15 October 22, 2015. He is reporting back to Captain
16 Serafini on the results of the conference with
17 Officer Thomas.

18 A Okay.

19 Q Have you seen this email before?

20 A No.

21 Q In his report of the conversation, Lieutenant Whelan
22 essentially states that Officer Thomas defended
23 herself, and he further states that he's never

1 witnessed rudeness from her, right?

2 A Yes.

3 Q He also says that he has often witnessed her
4 explaining the circumstances to citizens and they
5 almost never like it or agree with her. And based on
6 that, he says, "She has been advised and I think she
7 gets a pass."

8 So based on this account of the conference, do
9 you think this is a sufficient way to address all of
10 the complaints that Officer Thomas received
11 concerning her behavior at traffic stops?

12 A Well, she was counseled. It was essentially done
13 in-house at the station house, so she was counseled
14 about her behavior, so she was put on notice.

15 Q What, if anything, could you have done to address
16 this issue and prevent it from continuing to recur?

17 MR. POOLE: Form. What's the issue?

18 MS. WILNER: The issue is rudeness and
19 demeanor.

20 MR. POOLE: Alleged.

21 A She was spoken to on account. Captains have spoken
22 with her. A lieutenant had spoken with her. At one
23 point, I had spoken with her. I don't know. So

1 that's where -- that's where we addressed the issues
2 with her. A lot of these are allegations. I don't
3 know how -- what the other party's demeanor was.

4 MS. WILNER: Let's take a few minutes
5 break at this time.

6 (A recess was taken.)

7 BY MS. WILNER:

8 Q So Mr. Brinkworth, there were a number of times
9 during our conversation about the complaint
10 investigation process when you stated that you didn't
11 have enough information in order to know whether the
12 officer had acted appropriately or not; is that
13 right?

14 A Yes.

15 Q How did you feel comfortable signing off on the P-73s
16 if you didn't have enough facts to be able to reach a
17 conclusion as to what happened during the incident?

18 MR. POOLE: Form.

19 A You're referring to the P-73?

20 Q Yes.

21 A I may have had conversations. I don't know.

22 MS. WILNER: Okay. No further
23 questions. Thank you.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

MR. POOLE: Mr. Brinkworth?

THE WITNESS: Yes.

MR. POOLE: You can hear me okay? I'm
not going to ask you any questions.

THE WITNESS: Okay.

MR. POOLE: And you can mute and shut
down and leave the chat if you'd like,
please.

Everyone have a wonderful day and a
better evening.

(Deposition concluded at 4:43 p.m.)

* * * * *

1 STATE OF OHIO)

2 COUNTY OF CUYAHOGA)

3 I, Luanne K. Howe, Notary Public, in and for the
4 County of Cuyahoga, State of Ohio, do hereby certify:

5 That the witness whose testimony appears
6 hereinbefore was, before the commencement of his testimony,
7 duly sworn to testify the truth, the whole truth and nothing
8 but the truth; that said testimony was taken remotely
9 pursuant to notice at the time and place as herein set
10 forth; that said testimony was taken down by me and
11 thereafter transcribed into typewriting, and I hereby
12 certify the foregoing transcript is a full, true and correct
13 transcription of my shorthand notes so taken.

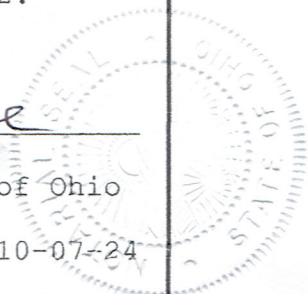
14 I further certify that I am neither counsel for
15 nor related to any party to said action, nor in any way
16 interested in the outcome thereof.

17 IN WITNESS WHEREOF, I have hereunto subscribed my
18 name and affixed my seal this 22nd day of March, 2022.

19
20
21
22
23

Luanne K. Howe
Luanne K. Howe
Notary Public - State of Ohio

My commission expires 10-07-24



MR. POOLE: [231] MS. WILNER: [45] 6/18 22/19 23/1 23/18 24/6 33/14 33/18 33/22 35/23 36/4 36/8 53/6 58/6 59/3 59/8 66/5 73/10 73/12 82/15 82/19 83/7 83/17 83/23 91/13 97/20 98/1 98/8 98/11 106/19 126/9 130/16 141/16 161/3 164/21 165/5 168/16 168/19 169/3 186/7 194/1 194/12 194/17 199/18 200/4 200/22 THE REPORTER: [2] 6/3 98/6 THE WITNESS: [8] 89/1 98/10 164/17 165/2 194/11 194/15 201/2 201/5	17 [2] 4/4 84/5 175 [1] 5/8 176 [1] 5/9 177 [1] 5/10 179 [1] 5/11 18 [3] 4/5 80/22 85/15 181 [1] 5/12 182 [1] 5/13 183 [1] 5/14 185 [1] 5/15 189 [1] 5/16 19 [4] 4/6 86/23 118/22 119/16 194 [1] 5/17 196 [1] 5/18 198 [1] 5/19 1992 [1] 97/10 1996 [1] 97/13 1:18-cv-00719-CCR [1] 1/8	27 [3] 4/14 112/4 157/9 275 [1] 2/5 28 [4] 4/15 60/10 114/16 169/23 29 [2] 4/16 115/1 294b [2] 140/21 141/8	67-74 [1] 4/13 68 [1] 3/20 69 percent [1] 105/22 6967 [1] 2/6	111/5 115/4 117/9 120/12 121/17 138/3 138/19 140/15 147/12 150/11 150/20 151/14 156/16 156/20 160/22 161/7 161/19 161/22 163/7 164/23 169/15 169/18 172/3 177/21 178/7 178/12 178/15 182/23 185/14 185/15 187/8 187/17 192/20 196/3 196/13 199/14 200/9 above [7] 48/5 48/7 48/9 49/8 49/13 49/19 71/2 absence [1] 97/12 academy [1] 129/1 acceptable [4] 83/9 131/20 132/7 173/17 accepted [1] 153/23 access [6] 121/18 153/2 153/6 155/23 156/4 156/7 accidents [1] 21/23 according [10] 36/15 95/22 106/14 119/3 171/6 172/6 173/5 179/14 193/7 195/23 account [3] 150/1 199/8 199/21 accounts [1] 102/3 accurate [4] 94/14 119/10 120/21 181/23 accurately [3] 10/11 10/14 35/20 accused [1] 8/7 achieve [1] 55/14 acknowledge [1] 6/9 act [5] 70/20 127/9 164/11 185/11 188/13 acted [3] 184/7 185/10 200/12 action [7] 17/3 129/13 131/21 132/5 169/10 196/16 202/15 actions [7] 83/4 108/21 116/13 128/9 133/18 161/12 191/18 activated [1] 71/18 active [1] 97/17 activities [2] 66/19 67/13 activity [13] 22/11 32/3 32/16 34/1 34/5 34/7 46/2 50/2 50/18 67/7 67/10 77/7 126/12 acts [1] 60/15 actual [6] 51/19 58/18 95/8 128/10 131/15 131/16 actually [14] 50/10 50/11 51/22 58/6 79/1 84/1 97/4 101/8 119/19 131/16 134/6 137/18 151/17 178/2 added [1] 192/22 additional [9] 55/9 79/9 79/14 79/16 81/23 117/17 117/21 146/12	
	2	3	7		
'Housing' [1] 143/21 'plain' [1] 70/22 'Strike' [1] 143/20	2-6-2016 [1] 4/10 2.4 [1] 136/20 20 [5] 4/7 41/12 89/3 119/22 194/7 2007 [1] 20/14 2011 [1] 102/22 2012 [4] 57/2 100/17 102/22 129/14 2013 [12] 79/8 87/3 89/6 103/3 143/14 169/23 175/22 178/6 179/3 181/9 186/2 186/10 2014 [9] 60/10 80/22 84/7 85/17 94/16 115/2 157/9 165/11 189/16 2015 [25] 32/22 34/22 42/5 44/21 75/19 91/15 92/16 94/16 94/20 96/1 101/10 102/5 103/4 105/1 107/5 108/4 108/5 118/22 119/16 119/22 145/17 194/21 196/11 196/21 198/15 2016 [8] 4/10 15/7 68/16 94/20 95/11 107/3 108/3 108/5 2017 [1] 94/2 2018 [3] 13/14 94/1 100/18 2019 [1] 129/14 2022 [2] 1/16 202/18 21 [4] 4/8 79/8 92/10 105/1 212-633-6967 [1] 2/6 22 [8] 4/9 34/22 42/5 45/15 93/22 106/23 186/10 198/15 22nd [1] 202/18 23 [3] 3/8 4/10 95/10 24 [6] 4/11 38/16 38/22 38/22 100/10 202/22 25 [3] 4/12 41/12 104/22 26 [2] 4/13 110/23	3,300 [1] 86/3 3.7 [1] 135/1 3.8 [3] 135/13 140/16 148/20 30 [8] 4/17 13/2 41/12 84/7 92/15 98/11 118/20 145/17 31 [2] 4/18 119/13 312 [3] 28/11 28/15 28/21 32 [2] 3/9 5/20 33 [2] 4/19 119/20 34 [3] 3/10 4/20 131/7 35 [3] 3/11 4/21 143/12 36 [2] 5/3 145/14 37 [2] 5/4 157/3 38 [3] 3/12 5/5 162/2 39 [2] 5/6 165/9	7-21-2015 [1] 194/21 70 percent [2] 105/20 105/22 71 percent [1] 105/22 716-851-4343 [1] 2/11 717 [1] 107/5 73 [21] 4/6 5/5 5/7 5/9 5/11 5/16 139/14 142/2 142/5 162/3 162/7 162/20 169/23 170/11 176/20 179/3 180/10 189/15 190/12 192/15 200/19 73s [1] 200/15 74 [1] 4/13 75 [1] 3/21 78 [1] 3/22	711/5 115/4 117/9 120/12 121/17 138/3 138/19 140/15 147/12 150/11 150/20 151/14 156/16 156/20 160/22 161/7 161/19 161/22 163/7 164/23 169/15 169/18 172/3 177/21 178/7 178/12 178/15 182/23 185/14 185/15 187/8 187/17 192/20 196/3 196/13 199/14 200/9 above [7] 48/5 48/7 48/9 49/8 49/13 49/19 71/2 absence [1] 97/12 academy [1] 129/1 acceptable [4] 83/9 131/20 132/7 173/17 accepted [1] 153/23 access [6] 121/18 153/2 153/6 155/23 156/4 156/7 accidents [1] 21/23 according [10] 36/15 95/22 106/14 119/3 171/6 172/6 173/5 179/14 193/7 195/23 account [3] 150/1 199/8 199/21 accounts [1] 102/3 accurate [4] 94/14 119/10 120/21 181/23 accurately [3] 10/11 10/14 35/20 accused [1] 8/7 achieve [1] 55/14 acknowledge [1] 6/9 act [5] 70/20 127/9 164/11 185/11 188/13 acted [3] 184/7 185/10 200/12 action [7] 17/3 129/13 131/21 132/5 169/10 196/16 202/15 actions [7] 83/4 108/21 116/13 128/9 133/18 161/12 191/18 activated [1] 71/18 active [1] 97/17 activities [2] 66/19 67/13 activity [13] 22/11 32/3 32/16 34/1 34/5 34/7 46/2 50/2 50/18 67/7 67/10 77/7 126/12 acts [1] 60/15 actual [6] 51/19 58/18 95/8 128/10 131/15 131/16 actually [14] 50/10 50/11 51/22 58/6 79/1 84/1 97/4 101/8 119/19 131/16 134/6 137/18 151/17 178/2 added [1] 192/22 additional [9] 55/9 79/9 79/14 79/16 81/23 117/17 117/21 146/12	
054224 [1] 186/1		4	8		
1		40 [5] 5/7 27/21 30/21 30/21 169/21 41 [4] 3/8 5/20 23/8 175/8 42 [3] 3/13 5/8 175/20 425 [1] 27/22 43 [2] 5/9 176/19 43 percent [1] 96/2 4343 [1] 2/11 44 [2] 5/10 177/23 45 [2] 5/11 179/2 46 [2] 5/12 181/8 47 [2] 5/13 182/22 48 [2] 5/14 183/22 49 [2] 5/15 185/23 4:43 [2] 1/17 201/12	8,895 [1] 108/5 80 [1] 4/3 84 [1] 4/4 85 [1] 4/5 86 [1] 4/6 89 [1] 4/7	accidents [1] 21/23 according [10] 36/15 95/22 106/14 119/3 171/6 172/6 173/5 179/14 193/7 195/23 account [3] 150/1 199/8 199/21 accounts [1] 102/3 accurate [4] 94/14 119/10 120/21 181/23 accurately [3] 10/11 10/14 35/20 accused [1] 8/7 achieve [1] 55/14 acknowledge [1] 6/9 act [5] 70/20 127/9 164/11 185/11 188/13 acted [3] 184/7 185/10 200/12 action [7] 17/3 129/13 131/21 132/5 169/10 196/16 202/15 actions [7] 83/4 108/21 116/13 128/9 133/18 161/12 191/18 activated [1] 71/18 active [1] 97/17 activities [2] 66/19 67/13 activity [13] 22/11 32/3 32/16 34/1 34/5 34/7 46/2 50/2 50/18 67/7 67/10 77/7 126/12 acts [1] 60/15 actual [6] 51/19 58/18 95/8 128/10 131/15 131/16 actually [14] 50/10 50/11 51/22 58/6 79/1 84/1 97/4 101/8 119/19 131/16 134/6 137/18 151/17 178/2 added [1] 192/22 additional [9] 55/9 79/9 79/14 79/16 81/23 117/17 117/21 146/12	
1,993 [1] 108/5 1.7 [2] 131/12 131/18 10 [4] 3/17 61/23 70/16 87/3 10-07-24 [1] 202/22 100 [1] 4/11 10001 [1] 2/5 104 [1] 4/12 11 [3] 3/18 32/22 63/19 110 [1] 4/13 1100 [1] 2/9 112 [1] 4/14 114 [1] 4/15 115 [1] 4/16 118 [1] 4/17 119 [2] 4/18 4/19 12 [5] 3/19 57/2 65/16 66/9 68/16 12:30 [1] 88/22 12:45 [1] 98/13 13 [3] 3/20 68/12 189/16 131 [1] 4/20 14 [3] 3/21 75/17 169/21 14202 [1] 2/10 143 [1] 4/21 145 [1] 5/3 15 [6] 3/22 4/20 75/19 78/23 131/8 165/11 1506 [1] 2/5 157 [1] 5/4 16 [3] 1/16 4/3 80/16 162 [1] 5/5 165 [1] 5/6 169 [1] 5/7	2	5	9		
		50 [2] 5/16 189/14 51 [2] 5/17 194/19 511 [6] 112/16 112/21 112/23 113/5 114/4 115/17 511-b [11] 110/18 111/16 111/19 112/1 112/15 113/20 115/18 116/2 116/4 182/18 185/19 52 [2] 5/18 196/19 53 [3] 3/14 5/19 198/12 56 [1] 3/15	9,916 [1] 107/4 92 [1] 4/8 93 [1] 4/9 95 [1] 4/10 95 percent [2] 22/16 22/17 9:08 [1] 1/17		
		6	A		
		6.3 [3] 111/7 115/11 115/15 60 [1] 3/16 61 [1] 3/17 63 [1] 3/18 65 [2] 2/10 3/19	a.m [1] 1/17 abbreviation [3] 7/16 91/21 110/6 abiding [1] 124/22 able [19] 9/10 33/1 37/16 42/6 60/20 73/12 79/23 80/1 85/11 106/11 106/19 147/20 148/5 157/1 167/9 184/20 185/5 192/17 200/16 about [90] 8/6 17/6 18/5 18/22 21/2 22/11 29/20 30/21 36/1 36/13 37/2 38/21 40/15 41/5 41/12 41/14 43/10 50/10 50/17 51/5 51/10 55/5 59/11 59/15 59/20 61/20 62/23 67/21 68/22 69/17 75/2 76/16 78/8 78/21 79/10 79/20 82/21 84/11 86/21 86/22 89/9 90/19 93/2 96/20 100/3 100/7 101/9 101/20 101/23 103/14 103/21 109/21 110/3		

<p>A additional... [1] 153/19 address [12] 57/12 61/8 147/1 148/8 154/2 187/13 195/21 195/22 196/17 197/12 199/9 199/15 addressed [1] 200/1 addresses [3] 131/13 134/7 135/1 adequate [1] 188/21 adjudicated [1] 168/15 adjudications [2] 92/2 92/4 administer [1] 6/11 administered [1] 6/10 administration [5] 24/13 24/19 25/16 66/11 102/9 administrator [1] 113/13 administrators [1] 18/10 admitted [1] 167/8 advantageous [1] 77/2 advent [1] 103/2 advised [1] 199/6 Affairs [30] 130/21 131/1 135/4 135/9 135/12 138/8 139/2 139/6 139/7 139/11 139/17 142/4 142/8 145/19 148/6 150/10 150/12 151/1 151/5 151/6 154/4 154/6 154/14 156/13 162/16 184/3 189/4 189/8 189/10 189/13 affect [1] 121/20 affirmative [2] 127/9 130/8 affixed [1] 202/18 afoot [4] 122/13 163/14 163/18 191/3 after [6] 15/21 94/4 146/12 190/17 194/2 196/9 afterwards [2] 119/21 145/7 again [47] 16/9 18/23 19/1 19/4 49/16 49/22 50/6 50/20 61/6 63/17 65/15 69/15 76/23 77/22 83/14 91/9 94/20 102/10 102/12 106/20 109/7 115/6 116/22 119/12 125/11 125/14 145/1 147/23 149/10 156/10 156/12 158/5 163/19 166/12 169/12 175/17 177/22 178/20 180/21 185/14 186/23 187/22 191/7 191/20 192/20 196/21 198/5 against [20] 33/6 131/2 136/16 138/20 143/3 144/8 144/9 147/8 147/9 147/12 147/16 148/3 150/13 154/15</p>	<p>154/21 161/14 175/1 175/5 187/7 194/20 age [2] 17/7 46/17 agencies [1] 18/19 Agency [4] 91/16 91/19 91/22 95/23 agenda [2] 42/21 42/22 aggravated [2] 110/11 112/18 aggressive [1] 115/9 aggrieved [1] 174/6 ago [2] 48/3 160/21 agree [33] 16/15 16/20 43/2 44/5 44/15 45/6 48/14 55/19 66/20 81/10 81/18 87/15 87/23 88/3 105/20 112/11 112/15 115/3 116/3 116/14 120/12 124/3 124/21 132/1 136/11 136/14 157/13 166/1 173/14 176/9 185/15 185/18 199/5 agreed [2] 142/15 150/21 agreeing [2] 162/20 167/20 agreement [3] 6/14 6/16 195/10 ahead [8] 59/1 60/11 68/2 81/14 110/22 120/1 165/5 183/1 Akron [1] 97/10 al [2] 1/4 1/9 all [40] 1/6 20/6 25/3 31/18 33/8 33/23 40/13 43/12 45/8 62/15 67/13 70/20 71/1 88/20 98/8 112/2 124/9 140/17 141/18 148/2 148/20 158/12 158/19 158/20 158/20 164/16 166/12 175/4 183/22 187/9 187/10 188/18 188/23 189/4 191/20 192/22 193/9 194/4 198/1 199/9 allegation [8] 129/18 154/16 170/8 170/17 172/9 173/23 180/13 187/3 allegations [15] 134/11 135/3 136/23 137/2 137/6 154/21 179/15 179/16 180/11 180/14 180/16 180/17 180/21 188/12 200/2 alleged [8] 172/20 179/8 181/14 181/15 186/5 187/15 197/4 199/20 alleges [1] 129/14 allowed [4] 83/18 87/8 92/1 176/15 allows [1] 59/6 almost [3] 161/13 164/20 199/5 alone [2] 163/13 163/17</p>	<p>along [7] 16/11 32/21 33/4 40/19 63/8 134/4 176/4 already [4] 120/10 121/7 190/4 196/6 also [44] 2/12 7/14 26/19 45/4 46/21 50/6 50/20 51/4 63/4 67/8 72/22 77/15 79/12 80/2 80/21 81/23 83/12 87/21 89/12 90/2 90/4 97/14 105/6 108/2 108/3 108/22 114/6 116/11 118/23 125/2 125/5 125/12 140/6 163/2 170/2 171/4 172/20 179/3 180/3 183/23 184/7 185/9 187/3 199/3 although [2] 35/23 180/11 always [4] 16/18 113/15 152/7 173/19 am [4] 6/4 6/5 168/12 202/14 Amended [1] 129/13 Amendment [6] 58/19 59/6 59/12 59/15 118/9 118/12 among [1] 86/15 amount [1] 49/2 analysis [3] 38/3 38/11 71/23 ancillary [2] 78/1 86/13 another [14] 9/14 27/21 48/20 56/4 56/9 85/16 102/11 114/19 119/13 122/12 166/10 168/15 195/6 197/3 answer [21] 9/22 9/23 10/4 16/9 59/1 73/13 81/15 82/14 82/15 83/6 83/10 83/20 158/15 160/10 164/4 164/7 164/10 164/12 174/21 192/4 193/23 answered [2] 54/18 77/21 answering [1] 9/13 answers [1] 9/17 any [92] 6/12 8/17 8/20 10/2 10/4 10/6 10/9 10/13 10/16 13/9 15/19 15/23 16/3 17/19 19/11 19/21 22/9 31/13 44/12 47/4 51/21 52/3 54/22 55/4 55/8 58/9 62/9 70/20 71/2 71/10 71/14 71/19 71/23 75/9 81/4 81/16 88/9 92/7 94/13 95/6 95/19 96/4 105/7 105/10 107/15 114/2 116/8 117/16 117/21 118/6 122/21 125/11 125/14 129/10 129/18 130/8 133/15 133/23 134/21 137/18 138/2 139/23 141/16 141/16 144/21 145/5 146/12</p>	<p>148/7 150/16 150/17 153/19 157/14 158/1 158/16 159/4 160/3 162/11 164/6 167/2 167/9 169/9 169/14 170/12 173/7 177/16 183/18 191/8 196/16 198/3 201/4 202/15 202/15 anybody [14] 9/4 9/7 11/22 12/2 30/18 40/21 58/9 74/5 74/10 96/16 99/7 103/13 124/12 130/12 anymore [1] 78/7 anyone [1] 11/19 anything [16] 19/7 20/2 43/15 59/20 61/20 69/17 90/23 91/1 92/7 120/20 147/13 163/7 178/11 182/17 187/13 199/15 anyway [1] 49/11 apologize [8] 23/14 33/17 36/6 66/1 66/4 73/8 177/19 179/13 apparent [1] 46/11 apparently [4] 70/3 160/7 173/9 176/23 appear [4] 85/14 114/5 120/16 154/7 appearance [1] 134/16 APPEARING [4] 1/13 1/23 2/3 2/7 appears [9] 36/12 61/22 71/9 81/7 81/12 158/10 170/20 185/6 202/5 applies [1] 190/23 apply [3] 113/21 132/1 167/2 appreciable [1] 78/5 approach [2] 76/18 181/1 approached [2] 165/18 189/23 approaches [1] 115/10 approaching [1] 124/5 appropriate [11] 55/6 58/2 80/6 82/5 82/12 99/20 133/1 148/23 160/22 161/7 184/22 appropriately [3] 177/13 197/22 200/12 approved [4] 61/18 65/10 69/23 172/7 approving [1] 162/17 approximate [1] 46/17 approximately [6] 13/17 15/7 20/15 21/2 21/16 187/9 April [4] 34/22 75/19 79/8 103/3 April 15 [1] 75/19 April 2013 [1] 103/3 April 21 [1] 79/8 April 22 [1] 34/22 are [81] 7/19 8/14 9/2 9/11 12/5 12/7 12/21 15/19 33/1 33/11 34/6</p>	<p>36/9 38/16 40/9 42/6 42/8 43/18 44/3 44/5 44/6 44/16 45/3 45/5 47/20 50/5 52/5 61/10 67/13 69/2 71/1 77/23 82/22 94/13 96/5 100/16 100/18 100/21 105/17 110/5 111/1 111/3 115/11 116/13 118/1 118/9 118/23 120/13 122/3 124/22 125/12 126/11 126/16 131/9 131/20 132/19 136/22 138/11 138/20 139/1 152/18 158/14 158/21 159/22 161/1 174/10 174/11 175/4 175/5 178/20 180/21 181/12 188/9 188/12 189/7 192/10 192/15 193/18 193/20 195/2 195/10 200/2 area [26] 3/12 17/23 38/18 38/20 48/12 50/9 50/9 51/6 57/14 61/6 61/7 63/18 64/16 69/4 69/14 69/21 76/9 77/6 77/11 77/12 77/16 80/15 110/23 124/20 129/11 153/19 areas [13] 30/22 38/3 38/23 40/8 48/11 51/7 60/21 61/3 64/14 68/3 68/4 76/4 77/1 arguing [1] 85/10 argument [1] 88/8 arise [1] 20/2 armed [2] 17/4 180/3 arose [1] 132/22 around [15] 14/11 44/6 44/16 45/5 50/19 51/11 63/15 67/14 88/22 95/16 102/5 102/23 103/3 113/10 186/2 arrest [8] 37/17 76/7 76/16 76/22 76/22 77/4 112/21 114/8 arrestable [1] 77/8 arrested [2] 17/7 146/16 arrested even [1] 146/16 arrests [13] 16/22 17/1 17/12 17/13 17/14 17/17 17/19 37/21 75/13 87/11 91/6 112/16 167/13 article [12] 4/10 92/20 92/21 93/1 93/4 95/10 95/13 95/21 95/22 95/23 96/5 96/16 articles [1] 95/16 as [170] 7/5 12/16 12/18 12/20 12/21 12/23 13/3 14/23 15/23 19/6 21/21 23/3 24/8 24/8 25/6 27/3 27/8 27/11 28/1 29/5 30/19 32/6 32/19</p>
---	--	---	---	---

A	assigned [6] 26/17 30/22 124/18 131/22 135/15 137/5	away [4] 41/21 72/23 78/3 120/5	114/7 114/19 115/4 116/4 116/11 117/10 117/11 117/12 119/7 120/8 120/16 121/3 121/9 123/11 124/12 126/1 126/5 126/11 127/9 127/10 127/13 128/4 129/16 134/6 135/5 135/16 137/2 137/20 138/10 138/13 138/17 138/21 138/22 139/5 139/20 140/20 140/22 141/1 141/23 142/3 145/19 146/15 146/15 146/17 146/18 146/19 147/14 148/21 148/21 148/23 152/15 153/11 153/14 154/16 154/20 155/4 155/8 155/15 155/20 156/21 157/1 158/15 159/7 159/7 159/10 161/13 162/14 166/17 166/22 167/13 170/23 171/9 175/20 177/23 179/17 182/13 184/19 184/20 185/5 185/23 186/18 186/20 188/16 190/9 190/19 192/9 192/17 193/21 194/23 195/9 200/16	B	before [25] 8/1 9/13 9/14 10/4 13/1 14/14 20/22 21/3 23/11 25/1 28/19 35/17 84/18 94/11 97/6 100/12 102/13 107/5 112/9 114/22 142/9 167/1 178/7 198/19 202/6 began [3] 14/12 96/1 97/8 beginning [1] 73/22 behalf [1] 1/5 behavior [11] 140/12 145/4 178/9 183/11 187/9 187/14 187/15 196/17 197/12 199/11 199/14 behaviors [1] 157/2 behind [2] 95/12 162/17 being [23] 7/12 17/7 20/5 20/7 20/13 21/11 65/22 68/1 68/3 68/4 72/18 95/6 119/6 120/6 134/4 139/1 141/17 146/16 176/15 177/3 184/23 193/18 193/20 belief [2] 86/15 90/10 believe [42] 16/21 30/6 34/9 43/23 58/19 59/6 62/12 63/13 64/3 66/9 70/11 76/2 77/20 79/9 81/7 85/8 86/9 86/12 87/21 88/3 92/3 94/13 96/4 109/20 110/1 110/4 110/9 116/18 122/8 123/14 124/17 126/10 127/18 129/18 137/16 151/20 152/9 164/10 182/2 191/2 192/16 193/20 believed [3] 79/19 162/23 163/20 believes [3] 86/12 184/7 185/9 below [4] 40/21 92/13 131/19 132/6 belt [2] 179/10 181/16 belts [2] 56/3 172/21 benefit [6] 54/15 54/19 54/22 68/6 78/2 86/17 benefits [2] 92/22 93/10 Berkshire [1] 57/5 beside [1] 183/3 besides [3] 9/5 11/19 17/19 best [1] 90/19 better [6] 23/21 132/21 132/23 156/21 169/5 201/10 between [26] 12/14 18/11 18/16 19/4 47/16 60/2 63/22 66/10 68/13 72/12 80/18 94/16 94/20 101/4 101/12 102/23 104/23 113/5 118/21 127/6 132/10 141/2
as... [147] 34/16 35/13 35/15 35/19 36/21 36/21 37/1 37/13 38/7 38/15 39/5 42/3 42/4 44/3 50/10 51/16 53/10 53/11 53/12 53/12 56/16 56/17 57/23 58/3 60/1 60/4 60/17 61/1 61/1 61/2 61/2 61/23 62/9 63/19 63/20 65/16 67/2 68/12 68/14 69/3 69/23 70/12 70/12 71/5 71/6 75/17 75/18 78/21 78/23 79/1 80/16 80/17 84/5 84/6 85/12 85/15 85/16 86/23 89/3 89/4 89/15 90/7 90/15 90/19 92/10 92/11 93/22 93/23 95/10 100/10 104/22 104/22 108/4 109/2 109/5 109/12 112/4 113/9 114/3 114/16 114/17 116/12 117/18 118/20 118/21 119/13 119/17 120/6 122/7 122/15 123/23 129/15 130/8 131/4 131/7 132/1 133/8 139/12 140/5 141/11 143/12 143/12 144/1 144/12 145/14 145/15 146/20 150/15 150/15 150/20 152/14 153/21 154/20 155/23 157/3 157/3 157/15 161/5 161/14 161/15 164/8 165/9 169/21 169/22 174/9 175/9 175/10 176/19 177/1 178/10 179/2 181/9 182/2 182/22 183/3 183/16 183/16 186/19 189/14 191/17 193/1 194/7 195/9 196/13 198/12 200/17 202/9 aside [2] 34/4 45/4 ask [19] 13/3 13/11 31/12 43/20 58/6 59/18 77/3 83/17 83/18 103/13 128/18 128/21 130/12 134/19 139/8 158/23 170/16 194/5 201/4 asked [11] 33/8 54/17 65/2 77/20 97/1 145/23 169/18 184/23 186/15 187/4 194/4 asking [14] 9/14 38/20 43/19 52/17 79/8 104/14 108/20 150/12 161/5 166/15 166/18 168/21 192/19 192/20 ass [1] 179/11 assess [3] 101/23 103/13 192/18 assessment [3] 51/21 189/1 189/3	assistant [1] 2/9 assume [2] 107/11 182/15 assumed [1] 196/10 assuming [3] 141/6 182/17 189/13 assumption [2] 127/4 127/11 attached [1] 162/14 attempt [4] 121/14 148/10 148/15 180/5 attempted [2] 165/17 181/6 attempting [1] 183/8 attend [5] 40/17 40/21 41/2 41/6 41/9 attendant [1] 85/8 attended [1] 73/2 attention [6] 54/9 66/17 108/18 111/15 114/6 170/5 attitude [4] 184/19 184/23 188/2 188/3 attorney [18] 6/17 7/9 9/5 9/21 11/14 11/19 12/16 12/16 12/17 12/19 12/19 12/20 12/21 12/21 12/23 13/4 97/9 97/14 Attorney's [1] 12/9 attorneys [3] 6/8 11/23 12/3 audio [1] 9/1 August [4] 105/1 157/9 175/21 179/3 August 2013 [1] 179/3 August 21 [1] 105/1 August 27 [1] 157/9 authorities [3] 33/5 33/8 34/5 authority [16] 19/3 19/11 19/12 19/16 19/22 47/18 49/8 49/14 49/20 50/19 51/12 52/10 52/20 90/21 135/18 151/9 available [3] 90/15 108/16 183/10 Avenue [1] 2/5 average [6] 4/11 101/5 102/16 102/20 102/22 103/5 averaging [1] 101/12 avoid [2] 50/9 50/9 avoiding [1] 163/3 aware [26] 15/19 22/4 22/7 32/18 34/3 39/13 39/16 52/3 52/4 69/2 74/12 78/12 78/16 85/1 93/10 99/11 101/14 103/6 103/10 107/15 107/22 108/9 113/10 118/1 118/9 123/2 awareness [2] 81/18 87/16	back [32] 21/10 23/1 58/7 59/3 66/3 70/16 73/13 77/5 84/1 87/12 97/6 97/11 98/12 106/20 136/19 137/18 140/14 148/19 154/4 174/19 175/18 181/22 183/14 184/12 187/6 189/13 190/1 190/17 194/23 195/4 195/5 198/15 backfill [1] 77/5 background [1] 97/5 backseat [1] 179/11 bad [1] 50/9 Bailey [1] 57/4 based [30] 38/3 46/9 61/10 93/9 100/11 102/12 104/11 127/5 127/22 128/4 136/23 152/1 159/9 164/12 166/16 166/18 166/19 167/17 170/17 178/21 181/5 190/9 190/11 190/20 191/4 191/16 192/15 195/12 199/5 199/8 baseline [8] 48/5 48/7 48/8 48/9 48/9 49/9 49/13 49/19 basically [2] 18/20 64/14 basing [1] 159/9 basis [11] 39/13 62/18 83/13 108/17 165/13 169/15 173/2 182/16 186/20 189/20 190/7 Bates [1] 23/4 be [180] 6/6 7/13 9/10 11/9 15/5 16/13 16/23 31/8 31/10 32/15 34/20 36/12 37/16 37/17 38/2 38/20 40/15 40/23 40/23 41/12 41/20 44/23 46/4 46/12 46/19 46/20 48/8 48/9 49/8 49/12 49/18 49/23 50/20 50/23 51/15 51/17 51/18 54/5 57/14 57/20 58/12 60/20 60/22 61/1 61/4 61/9 61/10 62/6 62/12 62/16 65/6 65/11 65/14 66/3 66/18 69/21 72/9 72/9 72/19 72/23 73/12 76/12 77/12 77/13 77/14 77/15 77/23 79/23 79/23 80/7 80/14 82/11 85/10 85/11 87/8 89/12 89/15 98/12 99/21 105/21 106/2 106/19 111/1 111/7 111/11 111/17 111/22 113/9 113/21	114/7 114/19 115/4 116/4 116/11 117/10 117/11 117/12 119/7 120/8 120/16 121/3 121/9 123/11 124/12 126/1 126/5 126/11 127/9 127/10 127/13 128/4 129/16 134/6 135/5 135/16 137/2 137/20 138/10 138/13 138/17 138/21 138/22 139/5 139/20 140/20 140/22 141/1 141/23 142/3 145/19 146/15 146/15 146/17 146/18 146/19 147/14 148/21 148/21 148/23 152/15 153/11 153/14 154/16 154/20 155/4 155/8 155/15 155/20 156/21 157/1 158/15 159/7 159/7 159/10 161/13 162/14 166/17 166/22 167/13 170/23 171/9 175/20 177/23 179/17 182/13 184/19 184/20 185/5 185/23 186/18 186/20 188/16 190/9 190/19 192/9 192/17 193/21 194/23 195/9 200/16 Beaty [5] 24/21 65/17 66/10 75/18 75/23 became [4] 13/22 97/9 114/12 184/6 because [39] 13/11 17/9 24/1 24/11 25/1 28/16 40/8 45/8 49/10 54/1 74/17 77/4 77/12 77/22 79/23 81/9 81/12 96/12 103/18 104/6 117/7 121/9 121/19 124/20 126/2 144/17 146/16 150/21 162/22 164/14 170/9 172/4 177/1 183/3 186/16 187/5 188/2 188/5 191/10 become [3] 14/4 14/8 15/1 been [59] 7/4 8/1 14/11 17/2 26/16 32/20 35/15 42/3 43/10 53/13 54/17 56/16 57/21 58/17 65/3 65/7 66/14 67/1 71/17 81/6 89/4 93/9 95/15 102/8 104/1 106/11 107/5 115/14 120/10 121/7 122/5 126/14 126/16 133/19 147/20 148/5 149/9 150/13 155/16 155/17 156/14 161/11 161/21 161/23 162/16 162/22 168/7 174/15 174/17 182/11 182/20 183/8 185/20 189/10 192/22 196/2 196/9 198/7 199/6		

B	break [15] 10/2 10/4 27/6 53/4 88/22 97/7 98/3 98/9 130/17 164/17 165/1 165/6 194/3 194/13 200/5 breakdown [1] 30/9 breaking [1] 97/21 breaks [1] 10/3 bright [1] 44/2 bring [12] 24/4 34/18 35/3 86/9 114/9 114/10 115/6 121/21 122/1 133/11 138/16 154/5 bringing [2] 54/8 133/17 brings [1] 86/13 BRINKWORTH [70] 1/12 3/3 3/7 4/2 5/2 7/8 23/3 23/10 24/3 32/19 34/17 35/13 38/15 39/1 42/3 53/10 56/16 60/1 61/23 63/19 65/16 66/9 68/12 70/16 75/17 78/23 80/16 83/20 84/5 85/15 86/23 89/3 92/10 93/22 95/10 100/10 104/22 106/23 110/23 112/4 114/16 115/1 118/20 119/13 119/20 131/7 143/12 145/14 157/3 161/6 162/2 162/13 165/9 169/21 175/8 176/19 177/23 179/2 181/8 182/22 183/22 185/23 189/14 193/15 194/9 194/19 196/19 198/12 200/8 201/1 brought [3] 47/2 86/16 117/7 BTVA [3] 91/21 92/1 96/9 budget [6] 21/9 78/5 78/8 78/10 78/13 81/17 BUFFALO [63] 1/9 1/14 2/8 2/10 3/13 4/10 6/22 7/17 8/4 12/11 12/15 13/7 13/12 13/19 19/2 23/5 32/14 32/22 39/17 40/4 42/5 42/12 44/7 44/17 45/3 45/5 45/8 45/10 47/17 47/17 58/20 62/1 74/14 85/7 91/15 91/16 91/19 92/20 93/1 95/11 95/16 95/17 95/18 95/20 95/23 96/16 96/17 100/17 100/20 101/1 101/16 102/8 121/18 124/22 125/2 125/5 125/10 125/12 125/15 130/21 173/17 175/14 177/8 Buffalo's [1] 95/12 building [2] 28/11 33/5 buildings [10] 49/8	50/3 50/19 51/3 51/12 51/18 51/23 52/5 52/19 67/14 bullet [1] 37/2 Bureau [2] 92/21 93/3 burglary [1] 44/13 Burling [1] 2/13	C call [18] 28/17 28/22 30/3 41/15 42/16 66/1 98/23 115/1 119/20 132/20 135/9 167/18 168/13 186/5 186/7 193/19 194/10 194/14 called [9] 27/20 31/7 120/10 121/7 121/10 134/2 152/4 152/7 183/14 calling [1] 83/15 calls [7] 29/10 29/14 44/1 48/21 83/12 183/9 183/12 came [11] 29/10 35/8 95/13 97/10 135/9 136/7 144/6 148/11 148/16 175/12 196/12 camera [2] 9/1 67/7 can [101] 8/6 10/2 11/7 16/9 16/19 17/9 18/4 22/21 23/20 24/8 26/4 33/12 33/18 34/18 35/3 35/6 35/16 35/21 41/11 43/17 44/10 44/21 45/22 46/4 48/7 50/14 50/20 51/13 53/3 56/19 59/2 66/5 67/22 73/8 73/14 76/5 76/23 79/4 81/9 83/17 84/7 85/18 94/7 94/9 98/21 100/13 100/14 101/1 101/9 102/22 108/2 110/22 111/6 111/7 111/19 112/6 112/6 114/9 115/7 120/5 127/13 128/2 128/9 129/23 132/12 133/15 133/23 139/3 143/7 144/13 146/9 151/2 152/17 152/19 153/9 153/13 156/20 157/7 159/14 162/6 164/17 164/23 165/5 165/13 165/15 166/22 169/4 173/19 173/22 174/18 174/21 183/1 184/17 186/5 186/16 187/5 192/9 194/12 195/1 201/3 201/6 can't [35] 10/13 22/9 34/18 45/18 45/19 79/18 81/13 81/16 86/19 93/7 117/5 125/8 125/11 125/14 125/22 128/4 128/8 130/2 133/22 152/1 159/2 159/7 159/7 164/14 166/19 168/2 170/12 178/21 183/5 183/6 183/7 184/12	191/8 191/23 195/3 cannot [3] 164/6 164/14 188/23 captain [115] 26/7 26/11 26/11 26/14 26/17 26/21 27/5 27/16 28/5 29/9 29/9 29/16 41/2 53/14 60/7 60/9 60/14 61/20 64/4 79/8 79/19 80/6 80/21 85/18 87/7 87/15 87/21 88/3 88/12 88/15 89/9 90/10 90/13 92/14 105/1 114/18 118/22 119/15 119/22 128/18 128/18 135/11 136/8 137/14 137/20 137/20 138/1 139/20 139/21 139/23 140/10 142/5 142/6 143/14 143/15 143/19 145/2 145/17 145/23 147/3 149/12 149/18 151/8 153/4 153/5 153/9 153/15 160/7 161/3 162/3 162/20 165/11 165/16 165/21 167/8 167/18 167/19 169/14 170/8 171/6 171/12 171/17 171/18 172/11 172/15 173/1 173/10 177/1 177/5 177/12 179/14 181/2 184/22 188/15 188/20 189/15 189/21 190/11 191/10 191/17 192/1 193/2 195/7 196/1 196/5 196/7 196/7 196/10 196/12 196/13 196/23 197/7 197/11 198/4 198/15 captains [8] 19/20 40/23 47/9 133/20 138/2 138/11 149/2 199/21 car [24] 44/13 44/13 50/4 50/23 55/2 72/6 72/12 77/13 103/18 122/18 122/18 124/1 124/11 124/12 166/8 167/3 167/5 184/10 184/13 186/19 186/23 190/21 191/1 191/14 carefully [2] 148/22 149/6 cars [13] 37/13 51/6 54/16 71/22 72/8 72/8 72/18 72/20 72/23 81/3 86/4 86/12 158/19 case [24] 7/11 7/14 8/6 23/8 27/15 33/6 64/22 69/6 72/23 82/20 83/11 88/6 108/12 135/4 138/19 139/16 140/20 141/14 141/15 141/16 141/16 161/13 171/12 173/16 cases [4] 13/4 140/20 148/23 150/7	cash [3] 183/5 184/12 184/20 cause [15] 56/11 58/9 70/20 122/8 127/12 128/4 158/7 159/3 159/6 159/10 159/14 163/13 190/9 190/12 192/20 caused [4] 14/23 21/7 35/9 72/1 CCR [1] 1/8 CENTER [4] 2/4 6/19 7/9 38/11 Central [1] 33/6 certain [19] 26/13 26/14 32/14 36/13 39/23 43/23 95/8 110/1 110/2 118/10 126/11 126/14 133/7 183/16 185/14 185/15 192/13 194/5 198/11 certainly [3] 45/19 89/2 121/20 certainty [3] 22/9 164/6 170/12 certify [3] 202/4 202/12 202/14 CFS [2] 43/22 44/1 chain [23] 24/11 25/18 33/7 60/1 60/3 60/5 63/22 79/2 80/17 80/21 90/14 104/23 117/7 118/20 119/14 140/17 141/12 143/13 145/16 157/4 160/6 165/10 194/20 change [2] 140/13 145/4 changed [1] 20/12 Chapter [2] 4/20 131/8 character [3] 179/16 180/2 180/12 characterization [1] 161/4 charge [8] 41/7 135/16 135/18 135/22 182/6 182/9 182/15 182/16 charged [1] 182/11 charges [2] 85/8 85/9 chart [6] 3/8 23/6 24/11 101/9 102/11 102/18 chat [1] 201/7 check [6] 37/13 56/2 62/9 69/4 183/6 184/12 checked [1] 62/19 checkpoint [19] 56/12 62/7 63/7 65/10 65/12 71/7 73/17 73/20 73/23 157/16 157/18 157/21 158/19 158/22 160/7 162/22 163/4 163/5 164/1 checkpoints [20] 11/2 55/14 55/16 55/20 56/4 56/9 61/2 61/5 62/4 63/4 63/8 63/11 63/14 69/7 69/11 69/23 70/4 70/8 74/13
----------	--	--	---	--	---

C	7/8 73/7	183/23	commencement [1]	175/21 176/3 176/21
checkpoints... [1]	clean [11] 64/8 64/11	COB054572 [1] 175/20	202/6	177/13 178/1 178/2
74/18	64/14 64/14 64/15	COB056155 [2] 5/16	comment [1] 160/11	178/4 178/7 178/19
checks [1] 184/20	64/15 64/15 64/20	189/14	commenting [1] 169/6	179/4 179/6 181/3
chief [63] 13/20 13/21	64/22 65/3 65/13	COB056249 [2] 3/22	commission [1] 202/22	181/9 181/23 182/3
13/22 13/23 14/2	clear [2] 98/23 155/15	79/1	commissioner [29]	182/23 184/1 185/3
14/14 14/15 14/16	cleared [1] 146/18	COB056434 [2] 5/9	16/4 17/11 17/20	186/10 186/13 189/18
14/19 14/23 18/3	clearly [2] 9/17 92/21	176/19	24/13 24/18 25/9 41/7	189/20 192/18 194/20
19/14 20/8 20/13	climbing [2] 103/7	COB060319 [2] 3/11	41/9 41/13 57/1 60/2	194/22 195/6 195/8
22/13 24/12 25/6 27/3	103/11	35/15	61/17 66/23 74/20	195/9 196/20 196/20
27/8 27/11 29/5 31/6	close [4] 51/8 193/18	COB060320 [2] 3/17	75/1 79/7 87/2 89/5	197/3 197/23 200/9
31/8 31/10 32/5 35/19	193/20 193/23	62/2	100/6 104/13 118/23	complaints [60] 48/23
36/21 37/1 38/7 39/5	closed [3] 171/12	COB063327 [2] 4/6	119/4 120/5 120/15	116/10 131/2 135/5
40/21 51/20 62/9	172/8 179/17	86/23	121/14 121/21 155/17	135/6 136/15 137/22
78/21 90/19 94/9 97/1	closely [1] 18/9	COB328444 [2] 3/13	155/20 155/21	138/19 139/5 140/9
97/15 109/2 109/5	cloud [2] 179/18	42/4	commissioner's [3]	140/20 140/21 141/2
109/12 113/9 130/8	179/23	COB347125 [2] 4/21	30/3 30/5 82/1	141/3 143/3 143/20
131/4 132/2 133/8	coarse [1] 134/16	143/13	commissioners [2]	144/3 144/6 144/8
135/8 135/15 135/17	COB000313 [1] 4/13	COB421294 [2] 5/10	19/21 41/5	144/22 146/7 146/20
135/22 136/1 136/4	COB000795 [2] 4/20	177/23	commit [2] 125/2 130/4	146/21 146/22 147/5
136/9 144/1 150/15	131/8	COB590997 [2] 3/19	committed [5] 122/9	147/8 147/12 147/14
150/21 154/20 155/23	COB001613 [2] 3/12	65/17	124/2 158/8 158/16	147/16 148/2 148/8
162/12 174/9 193/1	38/17	COB591044 [2] 3/21	159/4	148/11 148/16 152/2
193/15 196/13	COB039337 [2] 3/10	75/18	Committee [1] 66/15	152/3 170/23 171/9
chiefs [9] 11/8 14/5	34/17	COB591045 [2] 3/15	committing [1] 68/9	175/1 175/5 176/23
14/9 38/1 40/13 40/19	COB039344 [2] 3/9	56/17	common [10] 40/2	177/2 178/3 178/6
41/15 60/23 61/11	32/20	COB591098 [2] 3/20	66/15 99/12 113/1	178/8 178/12 181/1
choice [2] 74/4 74/6	COB039610 [2] 3/16	68/14	146/22 146/23 147/18	186/8 187/7 187/11
choose [2] 34/12 57/8	60/4	COB591230 [2] 3/18	148/4 151/16 151/18	188/2 188/8 188/15
CHRIS [2] 2/8 6/21	COB040356 [2] 4/4	63/20	commonly [1] 86/15	188/16 188/19 189/7
CHRISTINE [1] 2/13	84/6	COB591284 [2] 4/17	communicate [6] 27/3	196/3 196/6 197/9
chronology [1] 13/12	COB040359 [2] 4/5	118/21	27/9 27/12 48/20	197/21 199/10
circumstances [5] 35/6	85/16	COB591446 [2] 4/16	123/10 159/23	complete [1] 180/4
118/10 120/11 163/19	COB040467 [2] 4/8	115/1	communicating [1]	completion [2] 135/17
199/4	92/11	COB591650 [2] 4/12	90/14	135/21
cited [1] 118/2	COB040533 [2] 4/19	104/23	communication [4]	complex [1] 136/22
citizen [11] 116/10	119/21	COB591726 [2] 4/3	27/15 29/13 82/22	compliance [1] 70/9
138/22 140/20 140/21	COB041829 [2] 5/3	80/17	82/23	compound [1] 27/7
141/2 141/2 141/5	145/15	COB591930 [2] 4/15	communications [2]	COMPSTAT [20] 3/13
141/6 144/3 150/13	COB041842 [2] 3/14	114/17	27/5 120/18	40/9 40/11 40/17
164/8	53/11	codes [2] 129/15	community [1] 53/20	40/21 41/3 41/8 41/9
citizens [7] 58/3 58/20	COB041965 [2] 5/17	129/17	compared [1] 108/4	41/11 41/19 41/22
124/22 143/20 159/22	194/19	coincides [1] 96/8	compilation [2] 29/19	42/5 42/12 42/16
193/4 199/4	COB042024 [2] 4/18	collect [3] 67/9 101/23	29/22	42/23 43/16 44/21
city [46] 1/9 2/8 2/9	119/14	103/13	complainant [5] 161/4	46/20 47/4 47/8
6/22 25/14 25/16	COB042316 [2] 4/9	color [1] 137/1	161/8 175/22 179/8	concentrated [1] 40/3
27/20 30/23 40/16	93/23	come [15] 19/13 28/17	194/21	concentration [3] 39/18
44/6 44/16 45/5 47/17	COB047810 [2] 5/18	28/18 31/5 73/19	complainant's [1]	39/20 40/1
52/9 64/13 77/14	196/19	84/14 84/21 91/18	151/21	concept [1] 122/3
77/17 78/17 81/5	COB047813 [2] 5/19	106/22 114/12 128/23	complainants [3] 150/1	concern [5] 54/10
81/20 86/10 86/14	198/12	136/9 138/7 152/16	151/14 188/18	80/15 178/14 178/19
86/17 87/12 87/18	COB053610 [1] 5/7	175/18	complaining [5] 84/10	193/2
91/15 91/18 92/1 92/4	COB053611 [1] 169/22	comfortable [1] 200/15	85/21 176/3 178/15	concerned [7] 17/6
92/20 92/22 93/2	COB053645 [2] 5/4	coming [5] 75/13	187/8	40/7 54/4 114/12
93/10 96/13 107/2	157/4	117/21 120/15 131/13	complaint [79] 129/13	115/10 121/17 144/1
107/4 107/7 107/12	COB053722 [2] 4/7	139/17	131/4 135/2 136/2	concerning [6] 140/19
107/16 107/19 107/22	89/4	command [23] 21/23	136/7 137/6 137/16	141/14 178/2 186/3
108/22 108/23 121/10	COB053811 [2] 5/13	24/11 24/15 25/19	138/4 138/23 139/17	196/21 199/11
124/20 175/13	182/22	26/4 90/14 117/7	145/1 145/15 145/20	concerns [3] 178/1
citywide [4] 43/4 43/21	COB053865 [4] 5/6 5/8	117/11 131/22 132/6	146/8 146/9 146/10	182/23 196/20
44/9 44/21	165/10 175/9	135/2 135/5 135/15	146/13 146/15 146/18	concluded [1] 201/12
claim [4] 171/13	COB053881 [2] 5/5	135/16 135/19 139/8	150/13 151/6 151/7	conclusion [3] 58/23
171/19 174/5 180/18	162/2	140/18 141/12 154/16	151/19 153/1 153/10	173/8 200/17
claims [1] 178/21	COB054 [1] 185/23	156/1 156/9 156/17	153/14 153/22 154/15	conditions [1] 10/10
clarify [7] 24/1 24/10	COB054155 [2] 5/11	189/8	155/5 157/5 157/7	conduct [12] 61/2 67/6
25/1 59/8 63/6 105/9	179/2	commander [3] 18/20	157/8 157/13 159/9	71/23 134/11 134/14
121/15	COB054205 [2] 5/12	19/1 19/6	159/10 160/9 160/23	134/21 137/11 140/1
class [1] 1/5	181/9	commanding [5] 93/20	161/14 162/4 165/12	183/13 188/6 188/11
classified [1] 195/9	COB054224 [1] 5/15	107/18 147/11 174/9	165/14 171/3 171/12	189/9
CLAUDIA [4] 2/4 6/18	COB054465 [2] 5/14	193/1	172/8 174/1 174/14	conducted [2] 171/22

<p>C</p> <p>conducted... [1] 189/5 conducting [4] 61/4 135/13 140/15 155/2 conducts [1] 188/5 conference [11] 154/8 154/9 155/7 197/11 197/18 198/3 198/5 198/7 198/9 198/16 199/8 conferences [1] 155/10 confiscate [3] 182/19 183/17 185/17 confiscated [1] 176/6 conjunction [2] 65/11 65/12 connection [4] 8/3 112/16 112/20 162/4 consent [3] 6/12 6/20 7/1 consider [7] 49/6 49/7 49/12 49/18 83/7 148/7 172/7 considerably [1] 89/22 consideration [1] 123/15 considering [1] 80/7 consistent [5] 101/3 135/7 135/23 182/3 183/13 constraints [2] 78/5 78/13 construe [1] 150/19 Cont [2] 4/1 5/1 contact [6] 37/7 144/17 144/18 181/6 181/7 183/8 contained [1] 46/4 contains [1] 38/22 contents [3] 43/2 162/18 169/7 contest [1] 173/22 contingent [1] 75/9 continual [1] 67/9 continue [3] 87/8 87/14 120/5 continued [2] 3/23 4/22 continuing [1] 199/16 continuous [1] 76/3 contract [1] 47/21 contracted [5] 47/16 48/4 120/9 121/6 121/9 contradiction [1] 120/21 contradictory [2] 120/13 120/16 contrary [2] 116/4 153/15 control [9] 19/17 31/19 55/21 55/22 55/23 63/17 90/22 91/9 111/23 controversial [1] 157/20 conversation [12] 90/12 115/4 117/20 120/4 121/23 122/2 154/5 171/16 187/17 187/20 198/21 200/9</p>	<p>conversations [3] 75/1 103/20 200/21 convey [1] 104/14 cooperating [2] 34/4 158/11 copied [7] 87/2 89/6 119/16 119/23 120/17 187/10 198/1 copy [1] 112/4 copying [1] 79/7 corners [1] 37/12 CORPORATION [2] 2/9 6/21 correct [29] 34/20 45/12 47/18 49/4 53/14 54/2 55/14 57/22 62/7 63/3 63/4 67/11 68/18 69/4 80/3 90/10 91/16 110/11 157/19 158/3 158/12 165/19 170/11 173/23 179/19 186/1 193/3 195/22 202/12 correctly [4] 109/4 158/12 164/11 168/12 costs [1] 78/10 could [68] 7/13 17/2 18/5 46/18 52/22 52/22 53/23 57/20 58/5 58/6 59/3 60/23 62/12 62/22 65/21 71/22 81/1 83/5 83/6 92/5 96/13 102/8 103/9 105/21 106/2 106/16 109/10 113/15 118/3 124/12 132/21 132/22 133/5 134/15 136/6 138/5 138/10 138/13 138/14 138/18 139/10 146/15 146/15 146/18 146/19 147/13 147/17 148/4 148/6 150/3 150/8 150/19 165/23 166/17 167/13 168/8 171/3 173/11 181/20 183/17 185/17 192/6 192/21 193/9 193/21 193/22 198/7 199/15 couldn't [2] 93/4 169/1 Council's [1] 66/15 counsel [4] 2/9 175/7 195/2 202/14 Counsel's [1] 6/22 counseled [2] 199/12 199/13 COUNTY [7] 1/23 6/1 12/8 12/15 38/11 202/2 202/4 couple [3] 10/18 53/4 97/5 course [6] 29/5 30/10 33/14 49/17 151/12 152/5 court [9] 1/1 6/4 9/10 9/18 66/2 173/12 173/16 173/19 173/22 courts [1] 174/7 cover [1] 42/4 covered [1] 45/20</p>	<p>covers [1] 136/20 Covington [1] 2/13 create [7] 14/18 30/23 31/2 47/14 48/18 63/17 77/1 created [5] 42/18 58/10 100/10 102/11 163/3 creating [3] 50/4 77/22 86/4 creation [1] 31/13 credibility [4] 152/4 152/8 152/10 152/21 crime [42] 30/22 31/1 31/17 36/16 36/19 36/22 40/8 42/5 42/15 43/4 43/5 44/10 44/12 44/16 44/21 45/9 48/16 48/19 51/3 51/11 51/14 51/23 55/16 55/20 61/8 63/15 64/17 64/20 67/13 68/7 68/8 68/9 75/20 76/4 76/23 77/19 78/3 122/12 124/20 158/8 163/13 163/18 Crime-fighting [1] 75/20 crimes [6] 44/11 44/22 60/17 60/22 126/14 126/17 criminal [5] 50/2 50/18 67/10 126/12 134/11 criminality [1] 191/3 crunch [1] 21/9 CSF [1] 43/21 culture [1] 124/6 cups [1] 53/4 curb [1] 189/22 curbing [1] 32/6 current [1] 41/14 currently [2] 12/5 12/7 CUYAHOGA [4] 1/23 6/1 202/2 202/4 cv [1] 1/8</p>	<p>181/18 182/8 184/14 201/9 202/18 days [2] 11/10 183/4 daytime [3] 95/3 95/7 95/9 deal [3] 79/12 79/16 177/19 dealer [3] 163/10 163/12 163/16 dealing [1] 136/1 deals [2] 111/2 113/19 dealt [2] 20/1 126/13 December [2] 57/2 165/11 December 12 [1] 57/2 December 15 [1] 165/11 decide [1] 139/7 decided [1] 14/18 decision [1] 58/13 dedicated [1] 77/16 defendants [3] 1/10 2/7 6/23 defended [1] 198/22 defending [1] 161/14 defer [1] 98/4 deficient [2] 132/14 142/20 define [4] 44/10 44/22 122/6 144/5 definition [2] 126/20 126/23 degree [9] 112/2 112/17 112/18 112/21 112/23 113/22 114/4 182/12 185/19 degrees [1] 113/6 delegate [1] 135/18 delegated [2] 139/19 153/4 Delwanda [1] 157/5 demeanor [7] 176/13 184/18 195/13 195/18 195/22 199/19 200/3 demonstrate [1] 56/5 demonstrating [1] 87/16 demoted [2] 15/2 15/5 demotion [2] 15/3 16/1 denied [1] 179/14 Density [3] 43/22 44/10 44/21 department [32] 2/8 7/17 8/4 12/11 12/15 13/2 13/7 13/13 13/19 18/11 23/6 32/14 32/22 62/1 78/9 95/17 96/17 100/17 100/21 101/2 101/17 104/20 105/11 130/21 134/12 134/14 134/21 135/4 141/7 173/18 177/8 184/3 Departmental [1] 140/23 departments [2] 18/16 19/4 depend [2] 28/16 72/14 dependent [1] 88/9</p>	<p>depending [1] 161/12 depicted [1] 100/18 deposed [1] 8/1 deposition [13] 6/7 6/9 7/12 8/12 8/15 10/17 11/15 11/22 82/20 83/11 168/16 168/22 201/12 deputy [16] 19/21 19/23 24/12 24/18 25/14 25/20 30/3 30/4 41/5 41/7 41/13 75/18 75/23 155/17 155/19 155/20 Derenda [27] 11/8 15/6 15/9 16/4 17/11 17/20 19/13 19/15 20/4 25/3 31/7 34/16 41/9 54/13 57/2 60/2 73/18 73/19 73/22 74/4 79/7 87/2 89/5 100/6 104/13 119/4 121/21 describe [4] 18/2 26/4 35/20 41/11 described [4] 178/10 182/2 183/3 191/17 describes [1] 165/16 description [5] 3/6 4/2 5/2 66/18 119/10 designated [2] 68/3 135/6 designed [1] 55/21 despite [1] 153/14 destroyed [3] 186/15 186/18 187/5 destroying [1] 186/21 detail [7] 18/2 48/10 48/10 48/13 60/19 89/13 134/1 detailed [1] 48/11 detailing [1] 92/20 details [6] 88/9 88/18 90/23 95/3 95/7 95/9 detect [2] 147/18 148/4 detective [3] 21/4 21/7 21/11 detectives [1] 41/1 deter [1] 55/20 determination [9] 91/10 105/19 136/5 138/9 138/14 139/12 152/14 168/18 192/19 determinations [3] 152/5 152/11 152/21 determinative [1] 193/23 determine [5] 51/21 105/16 145/12 152/8 152/12 determined [1] 73/5 determining [2] 140/5 145/5 deterrents [1] 51/23 develop [3] 18/13 38/1 38/3 developed [1] 56/11 developing [1] 38/4 device [2] 8/20 172/22 devices [1] 8/21 devoted [1] 47/5</p>
	<p>D</p> <p>daily [7] 10/23 11/11 29/15 37/3 39/13 62/18 73/22 dangerous [5] 124/12 160/8 160/11 161/5 161/11 dark [1] 105/19 data [5] 100/11 101/23 102/12 103/13 124/17 date [5] 33/9 89/6 95/8 133/23 157/8 dated [16] 60/10 68/16 79/7 80/22 84/7 85/17 87/3 92/15 95/11 115/1 118/22 143/14 145/17 169/22 189/15 194/21 dates [1] 91/17 daughter [1] 97/12 David [2] 80/18 84/7 day [10] 25/11 28/18 31/7 109/9 109/9</p>			

D	30/18 96/16 discussed [6] 12/2 54/12 93/16 93/20 123/18 178/8 discussing [4] 88/12 143/15 150/16 150/18 discussion [6] 22/23 66/7 73/11 96/19 122/6 194/18 discussions [1] 96/20 dismissed [2] 8/9 188/16 disparity [1] 129/23 disposition [5] 140/19 141/14 153/21 155/5 174/8 disproportionately [2] 148/11 148/16 dispute [1] 129/22 disputed [1] 159/18 disregard [1] 120/3 disrespectful [1] 178/11 distributed [3] 44/6 44/16 45/5 district [43] 1/1 1/2 12/8 13/9 13/10 13/16 15/1 18/8 18/12 18/17 18/18 20/10 20/11 20/13 20/16 20/19 20/23 21/13 21/14 21/18 21/19 21/20 21/22 22/5 22/8 22/11 27/23 38/2 41/15 41/17 43/5 45/4 45/11 45/13 45/14 60/23 61/11 64/5 81/5 125/18 125/21 144/10 151/3 districts [1] 40/15 division [6] 21/4 40/13 41/17 130/22 139/2 139/6 divisions [1] 41/16 do [152] 7/14 7/16 7/19 8/17 8/20 9/23 10/6 10/9 13/1 14/18 20/12 27/6 28/11 30/12 33/1 34/22 36/14 36/18 39/10 41/22 43/12 45/10 49/18 55/22 57/16 58/19 59/2 62/17 67/6 68/10 71/5 72/12 72/16 74/2 75/23 76/6 76/10 77/17 77/22 79/2 79/19 80/6 80/12 81/12 81/12 82/5 82/11 84/15 85/4 85/10 85/11 86/8 87/3 87/23 88/12 88/15 91/1 92/7 92/23 94/13 94/16 94/19 95/6 95/13 96/4 96/7 96/20 98/4 98/8 102/3 104/13 106/6 107/2 107/6 107/7 108/6 109/8 110/10 113/5 113/7 114/3 115/20 116/8 116/14 116/18	117/3 117/13 117/21 119/20 120/20 123/14 124/3 125/10 126/10 129/17 130/4 132/21 133/12 133/13 133/14 133/19 138/3 141/1 142/7 145/8 145/15 146/3 146/12 146/14 147/20 147/21 148/1 148/5 156/14 157/13 159/1 160/15 160/22 167/2 169/5 173/14 173/17 176/8 176/11 176/11 178/9 178/11 178/18 179/20 180/23 181/2 181/11 182/2 183/14 184/14 184/22 186/3 187/13 188/20 188/23 190/23 191/4 191/13 192/3 192/16 193/3 194/9 194/19 196/1 196/16 199/8 202/4 document [42] 23/3 23/10 32/19 33/8 34/10 35/13 35/17 35/19 35/22 36/15 37/23 38/16 38/22 42/3 42/9 42/11 42/19 43/3 46/19 46/19 47/3 60/4 61/23 80/16 84/5 85/15 86/23 89/3 92/10 93/22 93/23 104/22 114/16 119/13 131/7 143/12 145/14 157/3 165/9 169/22 170/3 181/8 documented [2] 134/13 134/20 documenting [1] 34/5 documents [8] 10/6 10/16 19/9 28/18 46/10 46/21 169/7 175/13 dodging [1] 183/12 does [48] 7/22 23/22 35/19 37/6 42/11 43/22 44/12 50/1 50/11 50/17 51/2 51/10 52/19 59/21 67/18 69/18 82/4 85/14 88/22 89/14 105/3 112/1 112/20 114/5 119/10 122/21 123/1 129/10 134/10 141/11 141/18 162/13 162/17 163/12 163/16 167/5 167/7 167/14 171/11 171/23 172/1 172/3 180/9 180/22 193/14 193/16 195/17 197/22 doesn't [17] 23/5 59/20 67/18 69/17 105/7 112/10 112/22 114/2 116/7 129/3 169/17 169/17 170/22 171/8 180/8 183/5 195/12 dogs [1] 73/2 doing [7] 12/7 13/4	29/6 47/11 54/21 78/2 131/17 dollars [1] 86/4 don't [225] done [12] 16/13 29/12 65/19 124/2 139/20 140/21 147/14 164/3 193/18 193/20 199/12 199/15 dots [1] 44/3 down [29] 13/12 27/7 33/7 34/18 35/15 37/2 37/23 60/3 65/20 79/3 79/4 90/14 100/14 109/10 111/6 111/8 112/6 114/9 114/10 117/21 132/9 146/9 152/16 157/7 160/8 165/12 166/9 201/7 202/10 downtown [1] 19/10 DPC [5] 35/2 66/11 100/6 104/13 121/22 dramatic [4] 95/12 96/7 107/3 108/3 draw [1] 114/6 drive [2] 29/9 76/6 driver [8] 118/1 158/6 158/8 159/1 165/19 165/22 165/22 190/4 driver's [5] 109/22 111/12 159/3 181/19 182/19 drivers [6] 120/8 129/14 129/17 130/4 130/5 148/12 driving [10] 51/1 110/12 111/21 118/2 126/3 158/14 167/21 168/9 181/17 182/11 drug [6] 22/4 48/15 163/1 163/10 163/12 163/16 drugs [3] 56/10 125/6 125/8 DUIs [1] 22/2 duly [2] 7/4 202/7 during [13] 28/18 94/3 95/1 95/7 97/17 100/17 102/21 103/6 107/12 108/6 187/9 200/9 200/17 duties [6] 18/3 29/5 49/17 49/23 51/16 116/8	education [1] 97/9 effect [2] 77/10 181/18 effected [1] 61/3 effective [9] 32/6 32/8 77/18 145/6 145/8 145/10 145/11 145/13 156/15 effort [1] 144/21 efforts [1] 31/22 eight [2] 129/15 160/21 either [5] 41/15 117/23 121/8 138/12 139/21 electronic [1] 8/21 electronically [1] 3/5 else [8] 9/7 11/19 30/18 43/15 74/10 96/17 99/7 128/22 email [100] 3/10 3/14 3/18 3/19 3/21 4/4 4/5 4/7 4/9 4/12 4/15 4/16 5/12 5/13 5/14 10/22 11/7 29/12 30/2 32/20 33/4 33/7 34/17 34/19 53/10 53/11 53/16 53/22 54/8 56/16 57/1 57/4 59/20 60/1 60/5 60/10 60/14 61/17 61/21 63/19 63/22 65/16 66/10 66/13 67/18 68/17 69/17 69/20 75/17 75/23 76/2 76/19 78/23 79/1 79/5 80/17 81/2 81/18 84/6 84/10 84/18 85/16 87/1 87/2 87/5 89/4 89/9 92/11 92/13 92/17 93/5 93/9 94/3 104/23 114/17 114/23 115/7 116/15 117/6 117/14 117/16 118/20 119/16 119/23 120/3 143/13 143/15 143/17 145/16 157/4 160/6 165/10 165/16 169/8 178/1 183/22 184/1 194/20 198/13 198/19 emailed [2] 30/6 93/7 emails [30] 3/9 3/15 3/16 3/20 3/22 4/3 4/8 4/17 4/18 4/19 4/21 5/3 5/4 5/6 5/8 5/10 5/15 5/17 5/18 5/19 64/7 68/13 68/16 73/22 74/2 115/3 119/1 175/6 186/2 198/1 embedded [1] 18/7 employed [1] 12/5 employee [3] 131/22 135/14 141/6 employee's [5] 135/5 135/15 139/8 140/17 141/12 employees [1] 132/5 employment [2] 8/3 12/14 enable [1] 192/4 encounter [1] 124/10 end [5] 39/22 45/13 45/14 75/15 155/4
			E	
			each [5] 25/11 71/18 99/14 103/18 188/15 easier [1] 94/6 east [10] 39/17 39/18 39/21 40/4 74/14 124/15 124/18 124/22 126/3 148/17 eastern [1] 45/13 eaten [1] 78/10 ECAC [5] 38/3 38/8 38/10 42/19 43/6 economic [4] 2/4 6/19 7/10 121/17	

E	104/14 106/3 114/12 117/1 117/14 118/15 118/17 121/14 121/21 123/10 123/18 130/12 132/22 134/19 137/4 141/10 142/19 142/23 147/11 147/16 148/7 148/10 148/15 149/1 149/5 149/8 149/14 149/20 153/18 153/22	explains [2] 132/9 190/16 explanation [3] 15/13 94/23 96/7 extenuating [1] 120/10 extra [1] 24/5 eye [2] 17/21 17/21 eyes [1] 24/7	21/17 24/12 38/16 43/20 72/13 97/11 112/1 112/16 112/18 113/6 113/21 115/6 135/10 136/3 139/22 160/6 182/12 185/19 Fitzgerald [1] 79/6 five [6] 38/1 53/4 101/12 130/17 164/18 194/13 five-minute [2] 53/4 194/13 fix [1] 175/17 flagged [1] 72/9 flashing [2] 46/6 71/16 fleet [1] 85/22 flip [1] 94/6 flow [3] 19/7 27/5 150/23 flowed [1] 18/22 focus [7] 22/18 76/2 76/14 104/8 109/7 174/23 198/13 focused [1] 67/1 focusing [3] 19/5 64/23 102/18 follow [3] 119/14 137/13 176/7 follow-up [1] 119/14 followed [3] 16/14 109/4 190/6 following [3] 16/16 109/14 117/16 follows [1] 7/5 forbidden [1] 115/21 Force [167] 3/11 3/12 10/21 10/23 11/1 11/9 11/11 13/23 14/5 14/9 14/12 14/14 14/16 14/19 15/20 18/5 18/20 19/5 19/15 20/4 20/6 22/14 25/2 25/12 26/1 26/6 26/10 26/15 26/20 27/8 27/11 28/2 28/5 28/7 29/11 29/20 30/2 30/10 30/20 31/2 31/6 31/8 31/10 31/14 31/16 31/19 32/2 32/9 33/8 34/2 34/7 34/9 34/12 34/20 35/4 35/14 35/20 36/2 36/14 37/3 37/10 37/20 38/2 38/5 38/13 38/18 38/19 38/23 39/8 39/10 39/14 39/16 40/3 41/2 41/23 47/8 55/13 60/8 60/9 60/19 61/6 62/4 63/9 63/12 70/5 70/7 73/4 74/20 75/6 75/10 75/14 76/20 78/12 79/13 79/15 80/18 81/8 85/2 85/11 85/22 86/3 86/15 86/21 87/17 89/10 92/15 93/16 94/4 94/8 96/11 97/15 99/4 99/8 99/11 99/21 100/2 100/8 100/19 101/7 101/15 102/1 102/5 103/2	103/21 104/14 104/18 106/4 106/7 106/10 107/1 107/8 107/19 110/17 113/1 114/13 114/20 115/9 115/14 115/20 116/13 116/18 117/17 119/4 122/14 123/7 123/10 124/14 128/16 133/16 136/16 143/4 143/16 144/1 144/8 144/18 144/22 147/4 147/9 147/13 147/17 148/3 155/11 172/12 175/2 176/5 176/15 176/16 Force' [1] 143/21 Force's [1] 31/22 foregoing [1] 202/12 forgive [1] 23/16 form [196] 14/21 15/11 15/17 16/5 16/9 16/17 17/8 27/6 30/14 31/3 32/11 32/17 34/14 35/11 35/21 40/5 44/18 45/7 46/10 46/13 46/23 48/17 49/15 49/21 52/1 52/7 52/12 54/6 55/1 55/17 56/7 56/13 57/10 57/18 57/23 58/15 58/22 62/20 63/2 65/5 66/21 68/2 70/2 70/14 71/8 74/16 74/22 75/7 77/20 78/14 78/19 79/17 79/22 80/5 80/9 81/11 81/22 82/3 82/9 82/13 83/8 84/11 84/13 84/22 85/6 85/13 86/2 86/11 86/18 87/19 88/1 89/17 90/1 91/5 91/11 93/13 94/18 98/19 99/15 99/23 101/19 102/6 103/17 104/10 106/1 107/10 108/19 109/16 110/20 113/3 113/8 113/12 113/23 115/16 115/22 116/16 116/21 120/14 120/23 112/17 124/16 124/23 125/7 126/4 126/18 127/1 127/8 127/23 128/6 128/13 129/5 129/20 130/3 130/6 136/18 137/9 140/3 140/8 140/21 141/4 141/8 141/9 141/15 142/13 142/17 142/21 144/4 147/22 148/14 151/23 152/22 153/17 154/11 154/18 156/6 156/10 156/18 156/22 157/17 158/5 158/18 159/5 159/12 159/15 159/21 160/2 160/4 160/13 160/18 160/20 161/1 161/9 161/16 162/10 164/5 166/7 167/16 167/23 168/10 169/12 170/14 170/19
endorse [1] 115/8 endorsed [1] 197/18 enforce [5] 55/2 56/1 71/11 122/10 167/9 enforced [1] 78/1 enforcement [24] 31/23 32/6 36/16 36/22 49/3 49/7 50/12 50/16 51/22 53/23 54/5 54/15 54/20 60/11 61/11 69/10 70/1 95/2 104/2 104/4 106/8 110/8 124/8 124/9 enforcing [6] 50/15 50/21 51/7 54/19 54/22 113/11 engage [2] 67/8 133/8 engaged [1] 34/8 engaging [5] 99/12 101/15 116/19 130/9 130/13 enough [7] 88/17 143/20 144/15 164/15 180/4 200/11 200/16 ensure [8] 36/22 71/14 71/19 106/12 142/11 142/15 172/15 174/10 ensuring [3] 75/5 109/2 109/13 entered [1] 165/23 enters [1] 9/7 enthusiastically [1] 115/8 entire [1] 35/22 entirely [1] 194/5 entitled [1] 95/11 entrances [2] 51/18 51/19 equates [2] 84/15 85/5 equipment [3] 82/6 82/8 134/13 Erie [3] 12/8 12/15 38/11 ESQ [3] 2/4 2/8 2/13 essentially [8] 18/7 37/7 47/14 48/9 176/8 179/9 198/22 199/12 estate [1] 13/5 et [2] 1/4 1/9 evaluate [1] 149/2 evaluated [1] 148/21 evaluating [1] 180/18 Evelyn [1] 178/3 even [8] 8/8 83/4 127/20 133/22 146/16 159/2 163/10 173/6 evening [1] 201/10 event [2] 156/11 193/9 events [3] 30/9 151/21 151/22 ever [54] 8/1 47/7 47/23 51/21 54/4 54/12 55/4 55/8 59/11 59/18 62/9 71/14 71/19 71/23 75/1 86/20 88/15 90/13 93/15 93/19 99/3 100/2 103/13 103/20	every [6] 28/6 28/16 62/7 62/11 155/13 184/14 everybody [3] 88/23 97/21 157/20 everyone [3] 84/14 84/21 201/9 everything [2] 9/11 24/8 evidence [2] 148/20 149/3 exact [2] 106/2 133/23 exactly [2] 106/17 133/12 EXAMINATION [3] 1/12 3/2 7/7 examined [1] 7/4 example [4] 62/3 99/13 145/19 154/7 examples [1] 16/19 exception [1] 120/6 excerpt [1] 4/13 excessive [3] 144/2 144/5 144/7 exchange [4] 66/10 91/3 92/12 117/16 excuse [7] 90/3 156/5 168/19 169/21 173/19 175/19 198/14 Executive [1] 19/2 exhibit [6] 3/6 22/20 24/10 119/19 175/15 176/1 exhibits [5] 3/23 4/22 5/20 194/2 194/7 exist [1] 120/11 exited [2] 165/19 189/22 exiting [1] 190/4 expanded [1] 101/11 expect [5] 43/4 43/16 46/11 84/14 84/21 expectations [5] 74/23 75/2 82/2 85/1 91/2 expected [1] 74/20 expecting [1] 160/9 expense [1] 87/13 experience [6] 35/19 46/9 126/10 126/13 135/7 139/5 experienced [1] 134/20 expired [4] 109/19 109/21 110/3 111/11 expires [1] 202/22 explain [7] 35/6 48/7 50/14 76/5 111/19 129/23 156/20 explained [2] 66/23 177/2 explaining [1] 199/4	F face [1] 8/7 fact [11] 54/9 62/10 71/15 172/4 173/2 178/23 180/22 180/23 187/22 188/1 188/14 factor [1] 152/20 factors [1] 152/2 facts [2] 150/1 200/16 failed [4] 91/6 126/3 126/8 149/2 falling [1] 132/6 fallout [1] 116/10 fallouts [1] 116/17 falls [1] 131/19 familiar [11] 39/2 40/9 42/8 43/13 47/20 110/5 111/3 112/3 112/10 122/3 131/10 far [3] 100/22 183/16 195/10 fast [1] 98/6 fat [1] 179/11 February [2] 95/11 189/16 February 13 [1] 189/16 federal [5] 33/5 33/7 34/4 82/20 83/11 feel [5] 36/4 99/20 100/12 184/15 200/15 fees [1] 184/14 felt [3] 149/14 149/20 173/10 few [4] 100/12 105/13 197/8 200/4 fewer [1] 45/3 field [1] 29/1 fighting [1] 75/20 figures [1] 96/4 file [8] 25/7 25/11 25/12 25/13 25/13 25/20 30/15 142/2 filed [11] 25/16 30/15 41/21 129/13 138/20 139/1 150/13 160/23 178/2 179/4 182/23 filing [1] 25/21 financial [3] 86/17 92/22 93/10 find [3] 151/16 151/18 153/22 findings [2] 185/6 189/5 fine [4] 23/18 53/7 164/19 165/6 finish [5] 9/12 9/14 81/15 157/11 164/22 finished [3] 36/9 97/11 97/13 firm [1] 177/4 first [21] 7/4 8/11 14/16		

F	generally [12] 27/14 41/10 43/4 96/20 109/12 126/19 136/3 142/8 149/11 149/17 151/20 159/22 generate [5] 81/9 85/12 87/23 88/5 88/17 generated [2] 96/6 108/23 generates [1] 81/20 generating [4] 78/16 87/17 88/10 96/21 generation [1] 86/22 gentleman [1] 184/5 Germaine [1] 181/10 get [22] 13/11 16/10 16/12 28/17 30/4 45/21 53/4 60/16 81/8 89/19 139/13 146/3 146/14 146/23 150/7 181/14 181/22 183/7 190/1 190/17 193/22 194/6 gets [2] 188/2 199/7 give [17] 9/17 16/19 41/16 53/16 75/20 80/22 87/4 89/7 90/2 90/4 92/16 119/17 151/7 162/4 163/13 163/17 194/12 given [10] 42/17 62/16 62/17 105/6 105/10 106/9 139/18 163/2 164/1 184/11 giving [1] 71/5 glasses [1] 24/4 go [44] 10/4 12/12 15/10 15/14 15/16 19/10 21/7 22/21 25/5 25/11 29/1 29/8 33/20 53/7 59/1 60/11 64/13 66/5 68/2 70/16 73/8 81/14 81/15 97/6 110/22 111/6 114/22 119/19 119/23 135/12 136/19 139/21 140/14 148/19 150/9 151/4 165/5 173/11 173/19 173/22 175/18 177/21 183/1 194/2 goal [3] 50/18 56/15 71/11 goes [1] 157/20 going [36] 9/1 15/4 15/5 25/3 25/18 31/8 34/16 35/13 38/20 43/18 43/19 45/15 53/10 60/4 61/10 70/16 77/23 95/21 98/23 102/11 106/23 108/5 111/6 113/18 119/19 124/10 131/12 140/14 157/16 162/2 174/23 186/9 194/3 194/16 198/13 201/4 gone [3] 137/23 181/18 183/4 good [7] 6/3 7/8 33/3 97/4 98/12 133/13	133/13 got [8] 21/9 33/20 37/15 51/6 146/7 152/8 154/6 169/8 got those [1] 146/7 gotten [1] 154/4 governs [1] 131/9 GPS [1] 172/21 Gramaglia [2] 32/21 33/4 grant [1] 53/1 granted [1] 52/21 graph [2] 100/10 100/15 gravity [2] 110/15 110/18 great [6] 24/7 79/12 79/16 87/10 89/12 124/4 greatly [1] 84/13 green [2] 44/2 100/21 Gregory [1] 186/11 grew [1] 103/3 ground [2] 151/16 151/18 grounds [3] 51/4 82/19 83/9 groups [2] 48/22 126/11 guess [9] 16/11 55/2 57/3 72/14 93/14 109/10 119/20 192/23 194/8 guidance [14] 55/4 55/9 59/14 99/3 99/8 114/3 117/17 117/21 118/6 123/3 123/6 137/18 138/2 139/23 guide [2] 61/1 129/10 guilty [1] 174/16 Gulledge [6] 171/3 171/5 171/17 172/4 172/20 173/10 Gulledge's [4] 170/8 170/17 170/20 174/5 guns [4] 22/10 46/6 56/10 125/22 guy [1] 110/8 guys [3] 50/9 69/3 98/7	171/20 172/12 173/2 180/14 180/18 181/1 181/18 181/21 182/11 185/7 187/16 189/21 190/6 196/2 196/6 197/8 197/20 198/7 198/7 199/22 199/23 200/12 200/21 half [3] 89/19 101/4 103/1 halfway [1] 37/2 hall [3] 2/9 27/20 67/6 hand [2] 62/12 101/7 handful [2] 29/3 71/17 handle [15] 132/23 136/4 136/8 136/10 138/5 138/6 138/13 139/13 140/10 145/2 145/23 147/3 151/8 156/13 177/12 handled [6] 17/2 138/10 138/13 150/6 185/3 197/22 handling [4] 92/23 93/11 138/15 147/7 happen [5] 56/14 139/10 142/19 142/23 151/16 happened [9] 30/9 103/3 133/16 133/23 139/4 151/14 169/18 182/8 200/17 happening [4] 40/15 41/17 90/17 195/3 happy [3] 10/3 23/19 169/5 harassment [1] 137/2 hard [1] 105/21 Hardy [1] 189/21 Harold [1] 118/21 harsh [1] 134/16 has [40] 34/22 64/7 79/2 81/6 81/16 84/14 84/21 86/3 87/3 103/18 107/1 110/9 120/7 120/9 121/2 121/7 121/10 122/7 122/8 127/12 127/15 127/15 130/21 145/15 146/17 150/13 159/1 173/15 174/7 181/10 182/20 183/8 184/22 186/3 189/16 193/14 194/19 197/8 199/3 199/6 have [221] haven't [2] 158/16 193/12 having [13] 7/4 19/7 46/9 79/14 90/12 96/20 100/1 117/20 121/23 122/2 141/22 178/9 188/18 he [149] 9/22 15/12 16/10 16/22 17/13 17/16 19/17 19/17 19/17 19/23 24/4 31/7 41/13 41/14 50/23 53/20 53/22 60/9 60/15 60/15 60/20	61/17 61/21 64/3 64/3 64/5 64/6 68/22 69/1 69/2 75/2 75/5 79/9 79/12 80/18 81/16 81/23 81/23 82/4 82/15 83/6 84/13 86/3 86/12 87/10 88/15 89/12 89/14 105/9 115/8 115/10 116/7 116/9 116/11 116/17 117/8 117/11 117/12 128/2 132/21 132/22 138/13 138/14 138/16 138/16 138/18 142/2 160/8 160/9 160/11 160/15 161/10 161/11 161/13 165/23 167/3 168/4 168/4 170/1 170/9 170/9 171/22 171/23 171/23 172/1 172/3 173/3 173/11 173/15 173/22 173/22 174/6 174/16 177/6 179/9 179/9 180/3 180/3 180/5 180/6 180/8 180/8 180/9 180/11 181/5 181/6 181/20 181/21 182/6 182/11 183/4 183/5 183/6 183/7 183/8 183/8 183/15 184/6 184/7 184/12 185/3 185/4 185/4 185/5 185/7 185/9 185/9 186/15 186/16 186/19 187/3 188/17 188/21 190/7 192/7 195/8 195/12 195/17 195/21 195/22 196/6 197/11 197/20 197/20 198/15 198/23 199/3 199/3 199/6 he's [12] 53/20 60/19 77/20 89/11 105/5 105/6 128/1 174/6 184/23 185/3 195/4 198/23 head [2] 9/19 113/17 heading [3] 43/21 44/20 195/4 headquarters [3] 19/10 35/4 171/4 heads [2] 40/13 41/15 health [1] 10/9 hear [4] 9/10 90/16 195/3 201/3 heard [3] 48/4 67/21 99/19 hearing [2] 154/8 154/9 heavily [1] 45/9 Heightened [1] 95/2 held [8] 12/10 13/6 19/15 22/23 66/7 73/11 86/15 194/18 help [7] 23/22 31/17 33/5 37/9 37/20 64/14 185/5 helped [2] 18/13 156/21
G	gain [1] 93/11 gang [15] 22/11 31/19 31/20 31/23 32/3 32/6 32/9 32/16 33/6 33/10 34/6 43/11 46/2 104/2 104/4 gangs [1] 125/13 Garland [6] 157/5 157/14 159/11 162/21 164/1 164/12 Garland's [1] 163/22 gatherings [1] 46/7 gave [1] 150/1 gender [1] 46/15 general [6] 34/5 104/8 138/21 141/5 146/19 150/20 generalized [1] 48/12	had [83] 10/18 12/12 16/1 16/3 16/3 19/12 19/17 19/17 23/4 23/19 25/2 27/19 27/19 27/19 48/23 51/4 53/23 58/17 67/1 69/3 71/17 71/18 76/22 77/4 88/16 90/21 90/21 91/1 91/9 92/7 96/18 97/5 97/11 97/12 99/12 99/19 105/8 105/13 107/5 117/3 117/8 120/4 137/5 141/13 144/17 144/18 148/1 148/2 151/17 156/2 156/12 156/15 156/23 158/8 161/12 162/22 164/3 165/19 165/22 165/23	173/15 174/7 181/10 182/20 183/8 184/22 186/3 189/16 193/14 194/19 197/8 199/3 199/6 have [221] haven't [2] 158/16 193/12 having [13] 7/4 19/7 46/9 79/14 90/12 96/20 100/1 117/20 121/23 122/2 141/22 178/9 188/18 he [149] 9/22 15/12 16/10 16/22 17/13 17/16 19/17 19/17 19/17 19/23 24/4 31/7 41/13 41/14 50/23 53/20 53/22 60/9 60/15 60/15 60/20	

H	202/6	how [65] 11/17 13/15	128/7 131/12 133/7	185/20
helpful [3] 24/23 134/6	his/her [1] 135/19	14/1 16/12 20/15	136/6 140/14 141/6	inappropriately [1]
196/22	history [4] 152/20	20/20 21/1 21/5 21/15	146/7 150/20 157/19	137/5
her [33] 135/19 158/11	153/2 153/7 196/14	22/13 25/8 28/4 28/14	157/19 158/12 161/3	incidences [1] 134/1
161/12 164/2 164/8	hoisted [1] 109/8	29/11 30/1 30/4 31/5	161/5 162/2 166/11	incident [14] 4/11 4/11
164/10 164/12 176/4	hold [5] 20/20 21/15	31/22 32/9 32/12	166/15 166/16 168/20	35/9 102/16 114/8
176/6 176/13 177/4	175/16 192/6 195/1	34/12 37/9 37/19	169/5 174/23 176/12	115/4 139/14 154/9
178/23 180/22 180/23	home [1] 165/23	39/20 41/5 41/18	177/21 177/21 179/20	164/23 167/9 176/14
187/8 187/17 188/2	homicide [2] 57/21	50/10 50/17 51/2	179/22 182/21 183/16	183/1 183/19 200/17
188/3 188/5 190/8	69/15	51/10 68/8 71/6 72/4	185/6 185/14 186/9	incidental [3] 116/1
193/6 197/9 197/12	homicides [8] 43/11	72/12 73/4 76/11	188/3 188/4 189/12	116/3 116/22
198/8 199/1 199/3	57/6 57/9 57/13 57/17	90/19 90/22 90/22	192/13 194/2 194/5	incidents [7] 15/23
199/5 199/11 199/14	58/4 58/13 58/21	96/6 97/23 98/1 98/4	194/16 198/10 198/13	16/1 17/3 18/14
199/22 199/22 199/23	honest [1] 41/20	105/16 129/7 132/21	201/3	116/23 186/3 186/6
200/2	hope [1] 22/20	132/22 135/23 140/1	I'm not [1] 179/20	include [8] 26/1 30/7
here [28] 42/21 43/20	hoped [1] 23/4	143/3 144/5 144/6	I've [6] 12/12 33/20	30/8 44/12 94/7 133/5
45/16 76/18 81/7	hopefully [12] 31/1	146/20 146/23 147/1	43/9 43/10 67/21	134/10 134/15
82/23 83/5 94/9 103/3	31/20 37/12 48/18	150/6 151/14 152/10	194/4	included [1] 192/14
111/1 112/5 113/20	54/20 68/7 69/16 78/1	160/19 177/18 192/9	[AD] [7] 136/20 137/3	includes [1] 92/12
114/10 131/18 134/6	140/12 145/4 151/18	192/13 194/5 200/3	137/4 155/2 170/16	including [3] 67/16
136/21 140/15 146/10	152/14	200/15	171/1 171/10	69/14 85/8
150/17 150/18 166/12	hoping [2] 88/21	How's [1] 56/22	idea [3] 72/14 159/13	incomplete [1] 126/7
167/2 170/6 177/17	157/19	Howe [4] 1/22 6/4	159/16	incorrect [2] 96/5
178/18 186/9 191/4	hotspot [1] 38/4	202/3 202/20	ideas [1] 16/12	129/19
197/8	hotspots [7] 38/2 44/3	however [3] 98/6	identification [3] 43/12	increase [8] 82/6 90/5
Here's [2] 45/22	44/5 44/15 45/3 45/5	135/20 188/12	62/2 181/20	94/23 98/16 107/12
179/21	55/16	huh [2] 127/3 141/8	identified [32] 32/12	107/19 107/22 108/9
hereby [2] 202/4	house [6] 26/18 34/23	hum [1] 77/7	35/15 42/4 53/11	increased [9] 60/16
202/11	145/1 150/8 199/13	hundreds [1] 86/4	56/17 60/4 63/20	65/2 65/4 80/8 89/21
herein [1] 202/9	199/13	hypothetical [1] 83/3	68/14 70/8 75/18 79/1	93/10 95/7 97/2 108/6
hereinbefore [1] 202/6	housing [134] 11/4	I	80/17 84/6 85/16 89/4	increases [1] 108/14
hereunto [1] 202/17	13/23 14/4 14/8 15/21	I didn't [1] 131/16	92/11 93/22 114/17	incurring [1] 184/14
herself [2] 188/5	18/5 18/23 19/3 19/6	I'd [2] 18/2 164/22	118/20 143/12 145/14	indicate [1] 6/14
198/23	19/15 19/23 20/1 20/2	I'll [49] 35/16 38/21	157/3 169/22 175/6	Indicating [5] 62/14
high [5] 40/8 56/5 76/4	20/3 22/15 25/12 26/2	42/3 43/8 43/19 53/16	175/8 176/19 179/2	114/10 170/6 180/2
76/23 87/14	26/5 26/9 26/10 26/14	60/6 61/23 63/6 63/20	181/8 182/22 185/10	193/11
high-crime [1] 76/4	26/19 27/12 28/2 28/5	65/18 66/3 66/17	189/14 198/12	individual [3] 26/16
higher [2] 30/22	28/8 29/12 29/15	75/20 79/2 81/2 83/7	identify [2] 32/9 159/14	32/12 150/6
124/20	29/18 30/2 30/8 31/5	87/4 89/3 89/7 92/10	illegal [3] 22/7 126/5	individualized [2]
him [25] 20/1 77/5	31/8 31/11 38/13 41/2	92/16 93/22 95/10	163/7	157/15 158/1
128/2 138/16 138/18	41/23 47/9 47/13	100/14 102/14 104/22	illegally [1] 51/17	individually [1] 1/5
146/16 166/1 167/21	47/15 47/17 48/4 48/5	112/4 114/6 114/16	immediate [1] 76/9	individuals [2] 178/15
168/4 168/8 179/9	48/15 48/16 49/1 49/2	115/6 118/20 119/13	immediately [2] 12/13	187/8
181/15 181/16 183/14	49/8 49/13 49/19	119/17 119/20 122/6	194/10	inform [1] 116/7
184/11 185/5 187/4	50/19 51/6 51/7 51/11	131/7 143/12 145/14	impact [4] 17/6 17/10	informal [4] 154/8
189/23 190/6 190/8	51/15 53/13 53/21	157/3 157/7 157/11	78/5 121/17	154/8 155/7 155/10
190/8 190/17 190/18	55/5 55/9 60/7 63/4	162/4 175/23 181/8	implicit [1] 127/10	information [28] 37/15
190/21 191/1	63/8 63/14 65/7 66/19	187/3 194/22 194/23	imply [1] 85/14	40/14 41/18 41/22
himself [4] 161/13	67/1 69/6 70/4 70/7	197/16	important [1] 43/15	43/6 43/10 45/17 46/2
168/14 183/3 197/20	75/6 75/10 75/14	I'm [104] 7/9 9/1 10/2	impound [21] 80/2	47/7 48/22 61/11
his [60] 24/4 49/17	76/20 78/12 79/13	12/8 12/18 22/21	84/11 84/14 84/20	66/18 67/9 70/21
74/23 75/2 80/10	79/15 86/16 86/21	23/19 26/13 26/13	85/7 86/12 111/23	101/20 108/16 154/23
80/12 80/14 80/15	87/8 87/17 87/22 88/4	32/18 33/16 34/3	121/19 166/3 166/6	156/15 158/11 164/15
81/14 81/18 81/19	88/16 89/10 93/16	34/16 35/13 35/23	167/14 169/15 181/21	166/17 169/18 180/4
82/10 82/11 86/9	94/5 94/8 96/11 97/15	36/13 38/20 39/23	182/2 182/3 182/13	188/23 189/2 190/11
86/12 116/8 116/12	99/4 99/8 99/11 99/21	42/20 43/18 43/19	182/16 183/7 184/13	192/21 200/11
127/5 128/9 135/19	100/2 100/8 100/19	43/23 43/23 45/15	184/14 185/19	informed [3] 154/20
138/13 149/14 149/20	101/7 101/11 101/14	52/4 52/8 52/8 52/13	impounded [9] 86/3	155/4 155/8
161/14 161/17 172/4	102/1 102/4 103/21	52/17 53/10 56/7 58/5	111/11 119/7 166/14	informs [1] 24/3
173/16 174/7 181/19	104/15 104/19 106/4	60/4 63/6 64/6 66/12	166/22 167/13 168/6	initial [1] 136/4
181/19 181/20 181/21	106/7 106/10 107/1	66/16 70/16 82/15	169/10 181/19	initially [8] 13/22 21/18
182/7 182/8 183/5	107/8 107/19 110/17	83/18 88/2 88/21	impounding [4] 49/18	26/13 26/13 26/14
183/5 183/6 183/6	113/1 114/13 117/17	91/12 95/8 95/21 97/4	50/17 81/19 117/19	136/8 137/14 157/14
183/7 183/9 184/12	119/4 122/14 123/7	98/6 98/23 102/11	impounds [14] 75/12	initiating [2] 131/21
184/12 184/13 184/18	123/10 128/15 133/16	103/8 106/23 110/1	78/18 81/3 82/6 82/7	132/4
184/19 185/5 185/7	136/12 136/16 143/3	110/1 111/6 112/3	84/15 85/1 85/5 85/12	initiative [1] 64/18
186/14 186/14 186/15	143/16 144/2 144/9	113/18 114/9 114/11	86/10 87/12 91/7	initiatives [1] 107/15
189/16 189/21 190/1	144/18 144/22 147/4	118/5 119/19 121/12	109/3 118/10	injury [2] 45/1 45/1
190/18 190/19 192/3	147/9 147/12 147/16	123/2 125/22 128/7	impression [1] 163/3	input [1] 58/17
195/4 196/23 198/21	148/3 155/11		improper [2] 168/20	inside [1] 190/17

<p>I</p> <p>insight [1] 81/16</p> <p>inspection [2] 110/3 111/12</p> <p>inspections [2] 56/3 115/19</p> <p>Inspector [4] 119/3 197/15 197/18 198/14</p> <p>Inspector Whelan [1] 198/14</p> <p>inspectors [1] 41/1</p> <p>instance [4] 158/10 163/22 164/7 173/23</p> <p>instances [5] 60/16 137/11 150/17 187/16 188/18</p> <p>instead [5] 9/19 98/20 99/17 116/9 137/7</p> <p>instruct [1] 172/15</p> <p>instruction [1] 169/14</p> <p>instructions [1] 70/19</p> <p>insubordination [1] 134/12</p> <p>intended [1] 177/17</p> <p>intent [5] 58/9 68/9 82/10 82/11 128/8</p> <p>interacting [1] 188/9</p> <p>intercede [1] 151/17</p> <p>interdiction [1] 48/15</p> <p>interdictions [3] 37/4 37/6 37/9</p> <p>interest [2] 79/13 79/16</p> <p>interested [1] 202/16</p> <p>Internal [30] 130/21 131/1 135/3 135/9 135/12 138/8 139/1 139/6 139/6 139/11 139/17 142/3 142/8 145/19 148/6 150/10 150/12 151/1 151/4 151/6 154/4 154/6 154/14 156/12 162/16 184/2 189/4 189/8 189/10 189/13</p> <p>interpret [2] 71/5 160/19</p> <p>interpretation [3] 88/7 116/14 167/22</p> <p>interrupt [1] 91/12</p> <p>interrupted [1] 65/23</p> <p>interrupting [2] 23/15 36/6</p> <p>intersection [2] 167/4 167/6</p> <p>interview [2] 35/3 180/5</p> <p>interviewed [2] 148/22 149/6</p> <p>interviewing [1] 34/23</p> <p>Intra [1] 140/23</p> <p>Intra-Departmental [1] 140/23</p> <p>introduce [29] 23/3 32/19 34/16 35/13 38/15 42/3 53/10 56/16 60/1 61/23 63/19 65/16 68/12 75/17 78/23 80/16 84/5 85/15 89/3 92/10 93/22 95/10 112/4</p>	<p>114/16 114/23 145/14 162/2 169/21 175/23</p> <p>introduced [1] 5/20</p> <p>intrusive [1] 71/20</p> <p>investigate [15] 122/12 130/13 131/2 135/2 135/4 135/6 135/11 139/7 139/9 148/10 148/15 150/12 171/18 173/1 195/17</p> <p>investigated [6] 137/3 141/17 170/23 171/10 174/15 195/13</p> <p>investigating [8] 137/7 137/22 138/4 142/1 153/1 154/14 171/13 195/8</p> <p>investigation [47] 131/5 131/6 131/15 131/17 135/13 135/14 135/20 137/5 137/12 139/18 139/19 140/2 140/7 140/16 142/12 142/19 143/5 145/16 145/20 146/1 149/15 149/20 151/7 151/9 151/10 152/5 153/4 155/1 170/17 171/22 172/8 173/7 174/2 175/8 179/17 180/4 181/3 189/6 189/10 189/11 192/1 192/3 192/9 192/10 192/17 197/1 200/10</p> <p>investigations [13] 136/2 136/12 136/15 136/21 136/22 149/12 149/18 150/22 151/13 155/2 188/20 188/22 189/9</p> <p>Investigative [1] 123/22</p> <p>investigator [2] 12/8 161/15</p> <p>investigatory [11] 122/3 122/7 122/15 122/21 123/4 123/8 123/12 123/15 126/2 129/3 137/12</p> <p>invoke [1] 133/2</p> <p>involve [4] 19/6 107/16 136/23 137/2</p> <p>involved [18] 20/5 32/15 33/11 34/7 39/7 57/21 60/3 74/17 74/19 80/21 125/12 126/11 126/14 126/16 151/1 152/8 162/23 175/7</p> <p>involving [1] 137/6</p> <p>irate [3] 184/6 184/15 185/4</p> <p>is [258]</p> <p>isn't [4] 61/8 102/12 174/9 192/3</p> <p>issuance [1] 129/23</p> <p>issuances [1] 87/11</p> <p>issue [34] 35/10 50/20 51/2 52/10 52/20 52/22 54/12 70/5</p>	<p>70/12 70/15 74/21 97/2 99/18 103/16 103/19 104/15 106/3 113/14 117/7 128/10 132/22 132/23 136/10 138/17 138/21 151/2 152/16 152/18 173/18 191/8 195/13 199/16 199/17 199/18</p> <p>issued [30] 34/11 51/16 53/2 62/6 70/9 72/15 72/19 92/6 98/16 100/16 101/8 102/19 102/21 104/20 105/4 105/12 106/6 106/10 107/4 107/5 107/7 108/4 113/2 129/16 167/14 172/12 172/16 172/20 173/15 181/16</p> <p>issues [14] 17/15 17/19 23/19 41/14 47/5 48/23 58/10 116/23 125/22 156/13 166/12 175/12 177/20 200/1</p> <p>issuing [18] 50/10 50/11 51/10 62/10 77/14 77/17 99/14 99/16 99/17 99/21 103/4 104/8 106/13 107/16 114/3 173/2 174/3 174/10</p> <p>it [360]</p> <p>it's [80] 23/8 27/20 33/3 33/16 34/17 35/15 45/21 53/11 54/9 58/22 60/10 61/14 62/22 63/22 66/9 68/1 68/3 68/3 75/18 77/11 79/1 79/5 79/6 79/7 79/23 80/6 80/12 80/22 81/13 82/5 83/3 83/4 83/15 87/2 87/3 92/15 94/6 95/2 95/11 102/19 104/6 105/22 112/5 114/10 115/1 115/2 118/22 119/13 119/15 122/5 127/18 127/22 128/7 139/13 141/6 143/14 145/16 145/17 155/13 155/16 155/16 158/21 164/19 164/19 169/1 169/23 173/17 173/21 173/21 175/20 177/23 178/1 179/2 183/15 183/22 185/10 189/15 192/7 196/6 198/10</p> <p>its [14] 37/10 37/20 51/16 55/14 63/11 70/4 87/12 93/11 115/10 122/15 124/14 135/17 135/21 177/10 itself [2] 55/2 140/7</p> <p>J</p> <p>January [3] 87/3 94/1 115/2</p>	<p>Jeff [1] 123/21</p> <p>job [9] 75/9 86/9 86/12 91/14 132/22 174/9 178/23 180/22 192/3</p> <p>Joseph [1] 32/21</p> <p>judge [1] 53/23</p> <p>judgment [2] 116/12 166/19</p> <p>July [6] 42/5 91/15 96/1 101/10 102/5 196/10</p> <p>July 2015 [2] 91/15 101/10</p> <p>July 22 [1] 42/5</p> <p>jumped [3] 94/17 94/20 96/2</p> <p>June [2] 32/22 145/17</p> <p>June 11 [1] 32/22</p> <p>June 30 [1] 145/17</p> <p>just [80] 11/18 13/11 16/10 16/14 17/15 18/1 22/19 23/15 24/1 24/3 24/8 24/10 25/1 29/4 29/6 29/9 29/22 33/12 33/16 33/20 38/21 42/12 43/8 43/18 50/11 53/3 59/8 63/6 64/15 65/14 71/22 73/12 76/8 77/6 78/7 79/2 88/20 95/4 95/19 96/1 97/5 98/20 98/23 104/8 105/9 105/18 105/21 112/12 115/6 124/2 124/2 130/16 136/6 140/5 140/11 140/14 144/17 145/7 146/19 150/2 152/17 155/15 155/20 157/19 160/23 164/22 168/4 168/23 175/15 175/16 177/19 178/7 178/8 180/12 180/12 181/14 190/7 192/7 194/11 194/15</p> <p>JUSTICE [3] 2/4 6/19 7/10</p> <p>justification [1] 82/7</p> <p>justified [7] 116/13 116/19 173/21 173/21 174/1 174/11 174/17</p> <p>K</p> <p>K-9 [1] 73/2</p> <p>keep [3] 9/1 92/5 169/9</p> <p>KEVIN [4] 1/12 3/3 162/12 193/15</p> <p>kicking [1] 8/7</p> <p>kid [3] 161/19 161/21 161/22</p> <p>kids [1] 17/6</p> <p>Kimberly [3] 24/21 65/17 66/10</p> <p>kind [8] 13/4 19/3 30/23 40/14 41/16 51/21 91/2 116/11</p> <p>knew [5] 39/18 39/23 96/12 99/16 121/20</p> <p>know [173] 9/8 14/18 16/10 30/8 31/4 32/1 32/4 32/8 32/12 33/14</p>	<p>34/15 35/8 35/8 35/12 36/20 37/17 39/10 39/20 41/22 42/20 47/1 51/5 51/13 52/2 52/9 52/14 53/17 54/7 56/14 58/10 58/11 58/16 60/12 62/17 62/18 64/19 64/21 65/19 67/4 68/4 72/12 73/6 74/1 74/7 74/23 77/23 78/8 78/15 78/15 78/20 79/3 80/10 80/14 82/10 84/23 88/11 91/4 91/17 92/7 92/8 92/9 96/15 96/18 99/17 102/7 102/10 103/18 104/20 104/21 105/18 105/19 106/2 107/7 107/11 107/14 108/6 108/20 108/21 110/16 110/21 111/8 113/4 113/5 113/16 115/20 116/1 116/22 118/14 119/8 121/5 121/8 122/18 122/19 123/23 124/5 124/10 125/18 130/7 131/11 141/1 141/10 144/5 144/6 144/14 144/19 146/23 154/1 154/2 154/9 155/13 156/2 156/2 156/11 160/14 161/10 161/17 166/8 166/12 166/13 166/14 166/16 166/18 171/16 173/7 174/7 176/18 177/16 177/16 177/17 180/7 181/5 182/6 183/14 183/21 184/17 184/18 184/18 184/19 184/20 186/23 187/1 187/16 187/19 190/7 190/21 190/22 190/23 191/7 191/7 191/8 191/20 191/21 191/22 191/22 191/23 192/13 192/21 192/22 193/6 193/6 193/7 193/12 193/13 193/17 196/2 196/5 196/5 196/12 198/6 199/23 200/3 200/11 200/21</p> <p>knowledge [5] 40/2 51/20 68/11 96/6 143/23</p> <p>known [2] 44/3 62/23</p> <p>L</p> <p>labeled [9] 32/20 34/17 38/17 38/17 44/9 104/22 131/7 165/9 196/19</p> <p>lady [2] 161/19 161/23</p> <p>lady might [1] 161/23</p> <p>Lajamie [1] 178/3</p> <p>Lance [1] 160/9</p> <p>Langfield [5] 64/23 67/2 68/18 68/20 69/7</p> <p>language [1] 134/16</p>
---	--	---	---	---

L	196/23 197/16 let's [5] 14/1 136/19 138/12 182/15 200/4 level [13] 16/11 40/21 131/19 136/10 138/5 138/6 138/10 138/13 150/23 151/3 185/8 191/13 197/12 Lewis [1] 184/2 liaison [3] 18/11 18/15 19/4 license [28] 97/17 109/21 109/22 110/10 110/13 111/12 111/22 118/2 119/6 120/8 121/2 165/22 181/17 181/19 182/7 182/8 182/12 182/20 183/5 183/12 183/16 184/10 185/14 185/15 186/14 186/15 186/21 187/4 licensed [2] 12/21 118/3 licenses [1] 37/16 lieu [1] 6/9 lieutenant [44] 11/9 13/8 13/15 15/1 20/9 20/13 20/15 20/19 21/21 64/3 80/19 81/3 81/7 82/5 84/10 84/20 85/4 85/10 85/17 85/21 86/7 86/8 92/13 92/19 93/5 114/20 115/7 116/7 120/4 125/15 136/7 137/14 137/23 140/10 145/3 147/2 150/15 151/8 153/10 153/15 197/12 198/14 198/21 199/22 lieutenants [24] 19/20 26/7 26/20 27/1 27/4 27/13 28/8 28/10 29/2 34/20 69/2 73/21 74/5 92/15 119/15 119/23 133/20 138/3 138/11 138/12 139/20 140/1 149/2 153/5 life [1] 77/9 lights [2] 71/16 71/18 like [30] 16/21 18/2 42/16 43/3 56/19 76/7 76/7 77/8 79/3 83/20 97/5 117/6 117/8 119/10 132/11 137/14 145/12 157/18 159/16 164/22 167/14 167/19 169/17 169/17 180/23 191/21 192/15 195/12 199/5 201/7 liked [2] 156/4 156/7 likely [5] 32/15 126/11 129/16 184/11 185/10 limitations [1] 118/13 limited [3] 37/1 76/8 166/21 limits [2] 131/20 132/7 line [10] 20/1 64/7 66/13 75/20 94/1 108/2 117/11 134/4 135/10 136/3	list [2] 37/3 38/1 listen [1] 152/3 lists [1] 38/4 little [27] 8/6 12/17 12/17 14/3 18/2 33/2 33/19 37/23 43/8 56/20 56/21 58/17 60/6 62/13 63/20 63/21 65/18 90/21 100/13 102/14 103/8 132/9 132/21 144/12 156/20 166/9 168/2 LLP [1] 2/13 located [3] 27/18 51/8 55/16 location [3] 28/1 33/9 74/4 locations [13] 11/9 39/8 39/11 42/1 58/18 61/10 68/22 69/4 73/4 73/17 73/20 73/23 74/18 Lockwood [21] 19/23 20/3 20/5 24/17 24/18 24/22 25/3 25/5 25/8 25/11 25/21 35/2 35/8 35/9 41/7 41/13 54/12 100/6 104/13 117/10 121/22 long [16] 13/15 14/1 17/9 20/15 20/20 21/1 21/5 21/15 72/4 72/12 97/23 98/1 98/3 98/4 98/6 194/6 long-term [1] 17/9 longer [2] 94/4 95/19 look [29] 10/20 22/19 70/19 90/13 90/17 94/10 95/22 97/1 100/13 102/14 110/22 111/6 112/10 115/7 117/1 127/4 134/6 140/14 140/16 146/9 147/16 148/2 169/17 170/1 175/11 175/16 185/1 193/8 195/12 looked [12] 10/18 10/22 10/22 10/23 43/9 112/13 117/3 167/1 174/2 188/15 188/18 191/21 looking [14] 37/2 42/21 44/20 45/2 61/17 79/5 102/15 105/21 108/2 123/11 136/20 148/20 157/13 160/6 lose [2] 76/10 76/11 losing [1] 121/18 lost [1] 176/7 lot [18] 13/5 16/22 17/1 17/14 18/21 18/21 19/9 51/4 76/6 77/2 78/9 81/13 109/8 140/10 144/12 150/7 181/21 200/2 lots [2] 52/5 55/11 loud [2] 159/17 159/18 LOVE [1] 1/4 low [1] 66/2 Luanne [8] 1/22 6/4	84/1 98/4 106/19 174/18 202/3 202/20 lunch [4] 88/22 97/21 98/5 98/9 luncheon [1] 98/14 M Macy [4] 53/12 53/19 68/13 68/17 made [16] 34/9 58/14 58/16 71/22 76/22 122/18 139/11 141/23 145/1 153/21 167/13 171/3 175/1 178/6 181/10 189/4 main [2] 17/23 31/16 maintain [2] 77/6 97/17 major [5] 95/15 133/1 134/7 134/10 135/11 majority [3] 57/15 74/12 124/21 make [44] 16/22 17/11 17/14 33/18 37/16 49/10 50/4 50/7 50/8 63/20 75/5 76/22 80/2 91/9 96/13 100/13 102/14 122/9 122/14 122/18 127/4 127/10 136/5 138/9 138/14 139/12 141/18 141/20 144/21 152/4 152/10 152/14 165/17 166/19 178/22 188/23 189/3 190/3 192/19 193/18 194/3 194/10 194/13 194/15 making [17] 16/23 37/7 37/7 37/21 50/6 50/11 71/15 82/22 105/18 123/4 123/7 123/12 123/15 128/10 137/15 141/21 178/20 males [2] 46/16 126/19 malice [1] 177/17 man [1] 185/3 managers [1] 67/10 manila [1] 30/15 manner [3] 6/13 115/9 188/7 manpower [1] 78/11 manual [21] 23/7 23/8 109/14 111/2 111/4 112/12 113/18 114/2 115/11 116/4 116/20 118/6 131/8 131/10 132/9 132/14 136/19 148/19 167/1 170/22 171/8 many [14] 11/17 17/14 70/12 71/6 81/6 101/8 103/16 104/5 110/9 129/7 146/3 146/14 146/20 152/1 map [7] 43/21 44/6 44/9 44/16 45/2 45/2 45/11 maps [8] 3/12 38/15 38/21 38/22 39/2 39/4 43/5 43/5 March [5] 1/16 80/22	85/17 92/15 202/18 March 30 [1] 92/15 margin [1] 81/4 mark [10] 86/23 100/10 104/22 118/20 119/13 131/7 143/12 157/3 165/9 181/8 marked [1] 5/20 materials [2] 10/16 46/21 matter [12] 110/15 110/18 121/6 140/11 146/16 152/16 178/23 180/22 180/23 187/22 188/1 188/14 mattered [1] 196/1 matters [1] 92/23 may [22] 9/21 30/9 60/10 68/16 84/7 89/6 111/7 111/11 114/19 124/1 124/2 132/16 135/18 152/15 152/16 154/3 175/16 175/17 178/6 182/19 190/3 200/21 May 12 [1] 68/16 maybe [23] 16/10 28/6 28/16 39/22 44/13 46/7 47/1 50/8 50/9 56/3 56/21 65/14 88/22 130/17 134/3 134/4 135/10 136/7 145/2 175/14 193/22 193/23 194/7 mayor [2] 25/14 25/20 mayor's [5] 36/16 64/8 64/12 64/17 65/3 McLellan [4] 118/22 119/3 197/16 197/18 me [64] 8/6 9/12 11/7 13/3 13/11 15/12 15/18 16/19 18/5 18/22 24/4 30/6 30/20 33/14 46/4 53/16 60/12 65/19 65/20 67/22 73/7 79/3 79/3 90/3 93/7 94/9 100/21 108/20 109/8 109/10 111/8 111/8 112/10 124/17 129/21 136/9 137/16 137/18 138/7 139/4 150/23 156/5 162/15 164/15 164/19 166/18 168/19 169/3 169/9 169/21 173/9 175/14 175/16 175/19 176/11 184/6 192/15 192/19 192/20 194/11 194/15 198/14 201/3 202/10 mean [27] 7/17 7/22 17/9 28/11 37/6 45/10 49/6 55/22 62/14 63/7 76/5 76/21 78/4 80/12 84/20 98/2 125/16 138/15 141/11 146/6 160/11 160/16 161/20 162/13 162/15 162/17 195/17 meaning [2] 9/18 146/7
---	---	--	---	---

M	89/7 92/17 162/5 187/6 194/13 197/16 minutes [6] 98/11 100/12 130/17 164/18 194/7 200/4 misidentified [1] 168/14 misperceptions [1] 152/17 misplaced [1] 177/15 missed [1] 166/11 missing [1] 177/7 mission [17] 3/11 31/16 31/20 35/14 35/20 36/2 36/13 36/15 37/10 37/20 47/13 48/14 48/20 50/1 50/12 51/11 55/14 misuse [1] 134/12 mobile [1] 70/21 moment [4] 68/7 80/23 119/17 132/11 money [3] 46/7 89/18 96/13 monitor [2] 67/7 75/12 month [5] 4/11 75/15 96/2 102/16 143/7 monthly [11] 10/22 11/4 11/5 25/13 25/15 29/18 29/23 40/12 40/12 40/13 108/17 months [3] 178/7 180/13 187/10 MOP [4] 3/8 4/13 4/20 114/14 moral [1] 134/11 more [53] 17/11 18/1 18/2 32/15 60/21 69/3 69/16 72/21 76/3 76/23 77/2 80/1 80/2 81/3 81/4 81/8 85/11 85/12 87/12 89/18 95/4 96/12 96/13 101/8 101/15 104/9 104/15 113/1 122/12 126/11 126/14 126/17 130/4 134/1 136/19 138/7 140/14 144/8 144/12 144/12 144/17 144/18 147/4 154/16 156/14 156/15 156/20 158/23 168/2 169/18 188/19 193/22 194/1 morning [2] 6/3 7/8 morphed [1] 138/6 most [3] 61/1 101/1 124/14 mostly [3] 29/14 39/16 133/21 motivation [2] 96/15 161/17 motorist [1] 122/8 motorists [2] 71/21 158/20 move [4] 62/12 78/2 162/6 165/15 moved [2] 27/20 27/21 moving [3] 37/23 135/1 197/15	Mr [3] 170/17 171/17 194/9 Mr. [28] 7/8 11/21 11/21 23/10 24/3 39/1 83/20 161/6 170/8 170/20 171/3 171/5 171/17 172/4 172/20 173/10 174/5 179/15 181/14 182/23 183/3 184/10 184/18 186/11 186/13 189/21 200/8 201/1 Mr. Brinkworth [8] 7/8 23/10 24/3 39/1 83/20 161/6 200/8 201/1 Mr. Gregory [1] 186/11 Mr. Gullede [6] 171/3 171/5 171/17 172/4 172/20 173/10 Mr. Gullede's [3] 170/8 170/20 174/5 Mr. Hardy [1] 189/21 Mr. Poole [1] 11/21 Mr. Quinn [1] 11/21 Mr. Roberts [1] 179/15 Mr. Saxon [1] 186/13 Mr. Scott [4] 181/14 182/23 183/3 184/18 Mr. Scott's [1] 184/10 Ms [25] 3/3 7/7 23/2 23/14 33/12 53/9 66/8 73/16 98/15 130/20 157/13 159/11 162/20 163/22 164/1 164/11 165/8 176/3 176/7 176/7 177/3 177/6 180/21 186/3 200/7 much [10] 22/13 23/23 29/11 31/22 45/17 78/8 81/12 108/6 144/13 192/13 multiple [19] 61/2 61/5 72/17 98/17 99/1 99/5 99/9 99/13 100/7 101/2 101/10 101/15 101/20 101/23 102/4 129/16 130/1 143/8 172/12 municipal [3] 6/23 19/3 47/17 music [2] 159/17 159/19 must [7] 9/23 82/15 133/2 148/21 148/21 161/21 170/12 mute [3] 194/16 195/3 201/6 my [33] 6/3 7/8 9/21 18/15 19/23 22/18 27/22 37/1 39/1 52/17 97/11 98/2 105/8 106/17 108/21 109/7 113/16 117/10 117/11 117/12 126/13 139/3 143/11 151/12 162/14 168/16 169/20 171/8 197/7 202/13 202/17 202/18 202/22 myself [1] 24/7	N N.Y [1] 1/9 name [6] 6/3 6/15 7/8 42/11 133/22 202/18 named [2] 14/6 181/10 NARC [3] 43/21 43/22 43/23 narcotics [1] 43/23 narrative [2] 30/7 190/16 narratives [1] 30/11 narrowing [1] 150/18 nasty [2] 178/11 195/7 national [4] 2/4 6/18 7/9 137/1 nature [4] 146/8 154/20 187/20 188/5 near [3] 49/3 49/7 197/7 nearby [1] 68/11 necessarily [8] 25/14 49/10 56/14 58/16 80/10 88/6 155/12 156/12 necessary [1] 70/15 need [24] 7/23 9/1 10/3 24/9 33/1 64/9 65/20 69/21 76/2 98/3 98/5 111/8 138/17 150/2 156/12 168/2 169/3 175/16 175/17 177/19 189/2 193/18 194/9 194/13 needed [8] 10/3 17/14 23/20 67/6 72/15 81/13 87/22 143/4 needing [1] 72/23 needs [3] 9/10 81/23 88/5 neighborhoods [5] 31/1 31/17 31/18 39/17 74/13 neither [1] 202/14 NELSON [1] 2/13 never [7] 16/6 62/19 86/22 123/23 183/10 198/23 199/5 new [9] 1/2 1/14 2/5 2/5 2/10 71/2 84/11 93/15 93/19 News [8] 4/10 92/20 93/1 95/11 95/16 95/18 95/20 96/16 next [7] 60/12 76/7 98/2 119/19 165/21 174/23 190/16 Niagara [1] 2/10 nice [2] 161/19 161/23 Nichols [2] 63/23 64/2 nine [1] 14/3 no [160] 8/19 8/23 9/6 9/18 10/8 10/12 10/15 12/1 12/4 14/13 14/15 14/15 14/20 15/22 16/2 16/6 16/6 17/13 17/18 17/22 24/6 25/7 25/7 25/20 25/20 26/3 27/10 27/14 27/22 28/3 28/23 29/17 30/19 31/12 32/8 33/3	35/18 38/6 39/6 39/9 39/15 40/8 41/10 45/8 47/22 52/4 53/6 54/7 59/7 59/17 59/23 62/18 67/20 69/19 70/6 72/2 72/14 73/1 74/9 74/19 75/8 75/11 76/1 76/21 78/22 83/2 84/4 84/19 85/3 85/21 86/22 88/14 90/9 90/18 90/21 90/22 91/9 94/4 94/12 94/15 95/14 96/6 97/3 98/10 99/6 99/10 101/18 102/2 103/15 103/23 104/3 104/17 104/20 106/2 108/8 110/15 110/18 112/10 112/10 112/22 118/11 118/19 123/9 123/17 123/22 126/22 129/6 129/21 130/11 130/15 134/23 137/10 140/4 143/9 144/14 145/12 147/10 147/19 148/9 148/13 148/18 149/16 149/22 152/23 153/3 153/8 153/12 153/16 153/20 155/3 159/3 159/6 159/6 159/13 159/16 160/17 163/9 163/11 163/15 164/9 165/5 165/22 167/13 168/1 172/2 172/6 178/13 180/10 181/22 184/6 185/4 185/7 185/23 186/17 190/15 191/16 195/16 195/17 198/20 200/22 nobody [1] 97/1 nodding [1] 9/19 non [5] 140/21 141/2 141/6 176/8 176/12 non-citizen [3] 140/21 141/2 141/6 non-responsive [2] 176/8 176/12 none [2] 31/15 131/6 normal [1] 49/17 normally [2] 46/4 76/20 North [6] 45/8 45/10 125/2 125/5 125/10 125/12 northeast [1] 45/14 not [200] 5/20 6/5 9/22 16/7 16/18 16/20 24/4 25/7 25/14 25/18 26/13 26/13 28/1 30/19 31/12 32/18 34/3 35/4 36/13 38/12 38/20 39/23 41/4 42/20 43/17 43/19 43/23 44/1 44/12 45/8 47/6 49/10 50/22 50/23 52/3 52/4 52/8 52/8 52/13 52/17 53/1 53/23 55/5 55/7 55/12 56/7 57/20 58/5 59/9 61/22 62/21 62/23 64/6 66/12 66/16
----------	--	--	--	--

<p>N</p> <p>not... [145] 71/20 73/3 74/8 74/11 75/4 78/2 80/12 82/17 83/4 83/9 83/10 83/12 83/15 88/11 90/16 90/23 91/9 91/12 93/4 93/8 93/18 93/21 94/13 95/8 96/23 100/5 100/9 104/3 104/15 106/22 107/17 107/21 108/11 110/1 110/1 110/8 110/8 111/11 112/3 112/20 113/7 113/16 114/5 114/7 116/3 118/5 118/11 118/16 121/1 121/11 121/12 121/16 122/10 123/2 123/13 123/20 127/22 128/7 128/17 128/20 128/23 133/7 138/10 142/22 143/2 143/10 145/10 146/7 147/15 149/4 149/6 149/7 149/9 149/10 149/15 149/21 151/4 153/20 155/17 157/19 158/11 160/1 164/6 164/10 164/12 165/23 167/7 167/8 167/17 167/20 170/16 171/23 172/2 172/3 172/6 173/1 173/5 174/1 175/4 176/12 176/15 179/20 180/3 180/5 180/10 180/23 181/20 182/8 182/15 182/18 182/20 182/21 183/9 183/12 183/14 183/14 183/15 183/15 183/16 184/11 184/19 184/19 184/20 185/5 185/11 185/13 185/14 185/15 188/3 188/7 188/23 189/9 192/7 192/13 192/16 193/3 194/5 195/17 195/21 195/22 195/23 197/23 198/10 200/12 201/4 not asking [1] 43/19 Notable [1] 42/15 Notary [2] 202/3 202/21 note [1] 111/10 notes [2] 10/6 202/13 nothing [8] 57/16 92/7 140/4 159/2 164/2 164/3 196/22 202/7 notice [5] 1/18 36/14 154/6 199/14 202/9 noticed [1] 144/15 noticing [1] 6/17 noting [1] 45/2 November [3] 118/22 119/16 119/22 November 19 [2] 118/22 119/16 November 20 [1] 119/22 now [13] 8/18 21/21</p>	<p>23/21 45/22 52/17 55/13 66/3 67/21 97/22 170/3 184/9 190/16 194/14 number [16] 17/17 23/5 43/9 65/17 72/15 74/21 94/16 98/16 100/15 102/20 102/22 112/7 144/3 144/21 146/20 200/8 Numbered [1] 36/3 numbering [1] 175/12 numbers [9] 75/9 75/12 84/14 84/21 94/11 103/3 106/9 108/5 144/20 numerous [1] 113/13</p> <p>O</p> <p>o'clock [1] 164/20 oath [3] 6/10 6/11 7/20 object [3] 9/21 14/21 159/2 objecting [2] 82/20 168/23 objection [3] 83/1 83/13 168/20 objections [1] 6/12 objective [1] 59/21 obligation [3] 109/12 141/13 188/6 obligations [1] 193/4 observations [1] 70/22 observe [9] 28/22 29/1 29/7 29/8 72/4 137/4 149/1 149/5 149/8 observed [1] 197/7 obtained [1] 70/21 obvious [1] 71/15 obviously [1] 156/23 occasion [6] 72/3 133/10 137/4 149/1 149/5 149/8 Occasionally [1] 37/13 occupants [1] 33/10 occurred [5] 8/9 22/8 60/22 163/20 187/19 occurring [1] 22/4 October [6] 169/23 181/9 186/2 186/10 196/21 198/15 October 2013 [2] 181/9 186/2 October 2015 [1] 196/21 October 22 [2] 186/10 198/15 October 28 [1] 169/23 off [18] 19/9 22/21 22/23 33/20 50/22 53/7 66/5 66/7 73/8 73/11 113/16 141/23 159/9 161/22 162/9 173/6 194/18 200/15 offense [3] 77/8 110/15 110/19 offenses [2] 112/2 112/2 offhand [1] 125/23 office [9] 6/22 12/9</p>	<p>27/18 30/3 30/5 132/20 176/5 176/16 195/4 officer [93] 20/23 21/8 21/11 49/16 53/20 53/20 56/10 64/3 68/10 68/11 68/13 68/17 72/15 77/3 105/16 122/7 127/12 128/9 129/2 129/3 131/14 132/16 133/2 138/16 139/15 140/12 141/11 142/1 150/14 152/14 153/18 154/7 154/15 154/21 155/7 155/21 158/7 158/22 159/1 162/23 164/11 166/3 172/20 173/2 174/9 175/2 175/2 175/5 176/4 177/1 177/3 178/9 178/15 178/22 179/5 179/8 179/14 179/18 180/14 181/11 181/15 182/19 183/9 183/11 183/18 184/7 185/9 186/4 186/13 187/7 187/13 187/21 188/17 189/23 190/3 190/17 191/17 193/1 193/3 194/20 195/6 195/13 195/17 196/3 196/14 196/17 196/21 197/4 198/5 198/17 198/22 199/10 200/12 officer's [9] 49/23 129/8 129/11 133/22 151/21 152/20 153/2 153/6 164/4 officers [137] 18/10 18/15 21/22 25/10 25/10 26/23 27/4 27/9 28/4 29/2 30/21 32/2 32/9 32/12 34/12 35/3 49/10 55/5 55/10 62/10 62/16 62/17 62/22 64/12 65/7 67/5 70/7 71/6 71/15 74/20 75/6 76/12 77/3 77/5 78/12 79/14 79/15 81/8 85/2 86/16 86/21 87/10 87/14 88/16 89/19 89/21 90/4 91/2 91/6 92/19 93/17 93/20 95/3 96/12 99/4 99/9 99/12 99/21 100/3 103/20 104/15 104/19 105/4 105/13 106/4 106/7 106/10 107/18 109/13 111/22 113/11 114/3 115/11 115/14 115/20 116/8 116/18 117/18 117/22 118/12 118/17 123/4 123/11 123/19 128/21 130/9 130/13 131/2 131/20 133/9 133/11 133/13 133/19 133/21 134/22 135/19 136/16 138/20 140/17 141/18</p>	<p>143/4 143/22 144/2 144/9 144/10 144/23 145/3 147/5 147/8 147/11 147/13 147/17 148/3 148/7 149/23 151/13 155/11 156/1 156/8 156/16 158/16 158/20 159/23 165/17 165/21 167/8 169/10 171/20 171/23 172/12 172/16 173/18 174/3 174/10 176/15 188/6 188/11 offices [2] 27/22 35/4 official [1] 123/21 often [6] 20/6 28/4 28/14 143/3 151/17 199/3 Oftentimes [3] 46/14 140/9 147/2 oh [4] 114/11 175/11 179/22 186/1 OHIO [5] 1/23 6/1 202/1 202/4 202/21 Ok [1] 161/18 okay [161] 8/11 9/2 9/15 9/16 9/20 9/21 10/2 10/5 11/1 11/11 11/14 12/14 13/3 13/6 13/9 13/15 13/18 13/21 14/1 14/8 14/16 14/18 15/3 19/21 20/20 20/22 21/3 21/15 21/21 23/13 24/1 24/18 24/21 24/23 25/6 26/9 26/11 26/19 27/8 32/23 33/1 33/4 33/18 33/23 33/23 35/1 36/8 36/11 36/14 42/8 42/14 42/16 42/21 44/2 45/15 45/18 52/15 53/18 56/18 56/19 60/13 60/13 64/1 64/10 66/5 66/13 68/15 70/18 70/23 71/4 74/2 74/4 75/22 79/4 79/4 79/11 81/1 84/9 85/20 87/6 89/8 91/13 91/23 92/18 96/3 97/4 97/20 97/21 98/8 99/2 101/6 102/17 105/2 110/22 111/6 111/9 111/9 111/18 112/4 112/8 112/19 114/11 114/21 114/22 115/13 119/2 119/9 119/18 120/2 130/18 131/18 131/23 132/13 133/8 134/9 134/18 145/18 146/11 157/6 157/10 157/12 162/6 162/6 162/7 165/2 165/15 166/11 166/11 169/3 170/4 170/4 170/5 170/7 170/10 175/3 176/2 176/22 177/19 177/21 178/5 178/6 179/7 179/22 180/1 180/3</p>	<p>183/2 186/12 189/19 189/19 189/20 190/2 191/12 192/2 194/17 197/2 197/17 197/17 198/18 200/22 201/3 201/5 once [7] 8/2 11/18 28/6 28/16 121/9 143/7 143/7 one [41] 17/5 20/17 26/15 26/17 27/19 31/7 33/13 43/20 47/1 55/13 72/21 95/9 98/16 98/21 99/14 101/4 101/12 102/15 102/23 103/1 104/16 112/7 112/23 115/6 122/7 125/8 136/19 138/12 140/14 155/13 163/2 168/15 172/16 175/18 177/6 187/17 189/12 195/1 198/8 198/10 199/22 ones [2] 135/12 189/7 only [15] 15/13 35/4 46/19 71/17 82/19 107/5 112/1 112/15 113/21 120/6 121/3 128/9 172/16 181/18 184/17 oops [1] 175/15 open [1] 8/17 operated [1] 76/20 operation [1] 110/12 operational [4] 19/11 19/12 19/16 19/22 operations [3] 95/16 96/1 109/9 operator's [1] 119/6 opine [1] 52/18 opinion [8] 16/3 16/7 100/1 160/15 161/11 166/6 177/12 178/22 opportunities [3] 89/15 90/2 90/7 opportunity [4] 35/22 90/5 91/8 122/11 opposed [1] 50/10 ORAL [1] 1/12 orange [2] 44/3 100/20 order [11] 82/1 87/22 88/4 158/6 171/18 189/2 190/19 190/23 191/14 197/12 200/11 ordered [3] 189/23 190/17 190/18 orders [4] 16/14 16/15 16/19 66/23 ordinance [8] 77/14 77/18 107/4 107/12 107/16 107/19 107/23 108/22 ordinances [2] 107/2 107/7 ordinarily [1] 158/14 ordinary [1] 58/20 organizational [3] 3/8 23/6 24/11 origin [1] 137/1 Originally [1] 73/18</p>
--	---	---	---	--

O	P			
other [40] 8/17 8/20 8/20 10/6 10/13 10/16 11/22 12/3 12/14 15/19 17/19 19/7 28/6 28/16 40/19 43/6 46/21 54/22 55/8 71/2 77/5 92/14 95/18 101/7 105/18 115/18 116/22 116/23 120/10 125/8 148/1 150/8 166/17 168/1 177/6 180/5 180/14 189/2 192/21 200/3 others [10] 1/6 32/21 54/21 64/13 72/9 109/11 176/4 181/6 181/7 188/13 our [10] 23/15 53/5 81/3 81/5 122/6 128/23 143/23 164/23 165/6 200/9 out [29] 8/9 22/20 29/1 29/8 37/18 43/15 50/5 51/5 51/6 60/16 61/7 64/14 70/8 77/3 77/11 77/16 89/11 90/22 95/4 95/13 153/22 175/19 179/16 180/2 180/11 187/3 190/18 191/14 192/13 outcome [2] 140/6 202/16 outlined [1] 76/18 outside [2] 18/19 116/19 outstanding [1] 37/17 over [31] 11/10 14/3 26/11 27/21 28/9 28/17 30/9 72/9 72/20 74/5 81/6 85/7 90/22 91/9 92/1 92/4 92/20 93/2 102/21 126/1 129/2 151/21 158/6 158/23 162/21 164/12 168/13 170/16 188/17 190/7 190/8 overall [2] 61/2 61/14 overhead [1] 71/16 oversaw [2] 18/8 19/23 oversight [5] 66/14 66/15 74/5 74/8 74/10 overtime [22] 60/19 87/4 87/8 87/13 87/22 88/4 88/9 88/18 89/13 89/15 89/18 89/19 89/22 90/2 90/4 90/7 90/10 90/14 90/20 90/22 91/3 91/7 Owens [1] 178/3 own [4] 63/11 70/4 93/11 105/13 owned [1] 52/9 owner [14] 52/21 53/1 119/5 119/8 120/7 120/9 121/2 166/10 167/18 167/21 168/7 168/8 168/14 177/10	P-294b [2] 140/21 141/8 P-73 [21] 4/6 5/5 5/7 5/9 5/11 5/16 139/14 142/2 142/5 162/3 162/7 162/20 169/23 170/11 176/20 179/3 180/10 189/15 190/12 192/15 200/19 P-73s [1] 200/15 p.m [2] 1/17 201/12 page [26] 3/2 3/6 3/8 4/2 5/2 23/8 38/16 38/19 42/21 44/9 44/20 45/15 45/17 60/12 79/5 88/21 93/23 94/6 95/19 95/21 157/4 160/6 168/3 170/1 181/14 186/9 pages [3] 4/13 38/16 43/19 paid [2] 81/6 89/19 panels [1] 18/18 paperwork [4] 18/21 18/21 19/1 19/7 paragraph [1] 66/17 parameters [1] 92/8 Pardon [2] 65/23 73/7 Park [1] 33/6 parked [6] 51/17 54/16 165/18 166/3 167/12 190/4 parking [20] 49/12 49/16 51/10 51/16 52/5 52/10 52/20 53/22 54/4 54/19 54/22 55/3 55/11 75/13 78/17 108/2 108/4 108/6 108/10 108/22 part [32] 12/16 36/1 36/12 36/13 36/14 36/21 45/19 49/12 49/18 49/23 51/16 61/14 64/17 69/15 69/23 86/9 95/22 104/8 111/3 113/9 122/15 124/6 127/20 131/1 131/10 134/21 157/15 170/5 173/6 175/14 176/12 190/16 part-time [1] 12/16 participate [1] 155/10 participated [1] 155/14 participating [3] 6/8 8/11 65/8 particular [12] 13/9 35/9 37/19 59/21 64/22 122/19 150/16 150/17 153/22 179/8 180/18 189/7 particularly [1] 136/22 particulars [3] 154/12 191/20 192/22 parties [2] 46/7 152/18 party [3] 118/3 174/6 202/15 party's [1] 200/3	pass [7] 47/7 71/22 72/8 72/8 163/5 163/6 199/7 passed [3] 162/15 164/1 164/9 passenger [2] 120/7 121/4 passes [1] 157/21 passing [6] 33/4 57/15 57/20 72/4 158/22 163/3 past [2] 52/21 120/6 patience [1] 24/5 Patrick [9] 60/2 60/7 79/6 87/1 89/5 169/23 176/20 184/1 184/5 patrol [10] 20/23 21/7 21/11 39/8 39/11 42/1 48/8 48/12 49/10 67/9 patrolled [1] 39/16 patrolling [2] 39/14 143/22 patrols [1] 67/8 pattern [2] 134/5 157/1 patterns [3] 42/15 147/18 148/4 pay [12] 79/10 79/20 80/7 81/9 82/8 87/23 88/5 88/10 88/17 121/10 183/6 184/12 paycheck [1] 89/18 paying [2] 87/12 108/18 penal [1] 113/16 pending [2] 10/4 33/21 pensions [1] 90/5 people [37] 30/21 32/15 35/3 37/8 37/18 41/12 46/6 46/12 50/5 50/8 51/5 57/15 68/4 72/4 76/23 78/2 121/18 121/20 124/21 125/2 125/5 125/10 125/12 126/10 126/13 126/16 133/17 144/19 152/7 152/12 158/14 158/21 177/6 178/20 180/15 180/23 188/13 per [11] 4/11 4/11 35/2 101/4 101/8 102/16 103/1 103/5 104/16 143/8 172/16 perceive [1] 152/15 percent [7] 22/16 22/17 96/2 105/20 105/22 105/22 105/22 perform [2] 37/3 51/21 performance [4] 131/19 132/6 132/15 145/7 performed [5] 49/2 149/12 149/18 181/2 188/20 performing [2] 37/9 188/21 perhaps [3] 18/4 159/17 181/6 period [15] 30/10 42/6 42/13 94/7 95/1 95/7 95/8 97/18 100/17	101/3 103/6 107/13 108/7 187/18 190/6 permission [2] 52/22 53/1 permit [1] 109/18 permits [1] 58/19 permitted [1] 116/20 Perry [3] 28/12 28/15 28/21 persistent [1] 76/3 person [32] 6/10 8/7 28/4 28/7 29/13 29/14 44/12 45/1 55/9 57/20 68/9 123/14 126/22 127/4 127/15 127/19 129/4 162/23 163/7 163/10 166/10 168/20 173/19 178/23 180/22 181/10 184/9 184/15 187/22 188/1 188/14 197/3 person's [4] 50/22 126/21 127/21 182/19 personal [2] 31/13 198/3 personality [1] 18/1 personally [13] 25/7 28/14 29/1 39/7 55/4 55/8 59/14 74/17 87/13 99/3 123/6 128/11 141/12 personnel [1] 78/10 pertaining [2] 25/22 83/4 pertains [1] 179/5 Philip [1] 53/12 philosophy [1] 90/19 phone [9] 168/13 176/6 177/7 177/9 177/15 178/7 193/19 194/10 194/13 phones [1] 176/6 photos [1] 46/12 phrased [1] 82/18 Phyllis [1] 179/4 physical [3] 10/9 28/1 45/1 physically [3] 6/5 27/18 77/15 picked [2] 11/9 73/21 pictures [1] 46/6 PL [1] 113/15 place [8] 21/20 74/13 81/2 97/4 117/14 121/11 192/11 202/9 placed [1] 91/2 plain [1] 191/11 plaintiffs [4] 1/7 2/3 6/20 7/11 plan [2] 60/11 61/18 plans [1] 18/13 plate [10] 70/21 79/9 79/14 79/16 79/20 80/2 81/5 81/8 81/23 85/22 plates [5] 186/14 186/15 186/17 186/21 187/4 platoons [1] 26/8 please [32] 6/14 9/8	9/12 9/17 27/7 33/13 58/5 59/1 59/2 59/4 62/13 65/21 81/1 81/15 82/14 83/22 88/2 106/20 114/9 147/23 150/2 150/4 150/19 162/6 168/1 169/6 170/4 170/15 174/19 174/21 193/9 201/8 PO [2] 177/2 197/8 point [14] 14/15 19/14 73/21 101/11 101/12 154/22 157/20 173/14 183/4 186/6 187/3 189/23 198/8 199/23 points [2] 37/2 69/4 police [46] 7/17 8/4 12/11 12/15 13/2 13/7 13/13 13/19 19/21 23/6 32/14 32/22 41/5 47/15 57/14 62/1 65/2 65/4 65/15 66/13 66/15 67/22 67/22 68/6 68/8 68/10 68/11 76/3 76/14 77/7 77/10 78/8 82/5 86/16 95/17 96/17 100/17 100/20 101/1 101/16 130/21 141/7 159/23 173/17 177/8 188/6 policies [3] 110/23 121/19 129/10 policing [6] 16/12 47/10 61/14 78/5 78/13 122/15 policy [17] 36/17 36/19 36/23 92/9 109/3 109/14 109/18 111/10 118/1 119/11 120/13 120/22 121/12 121/15 122/21 123/1 182/4 political [2] 116/9 116/17 POOLE [3] 2/8 6/21 11/21 poor [1] 134/16 popping [1] 44/13 portion [1] 47/4 position [13] 12/10 12/23 13/6 14/19 14/23 20/7 20/20 21/10 21/15 21/17 31/5 66/12 184/10 positive [5] 132/10 132/16 132/19 133/8 134/2 possess [2] 125/5 125/10 possession [1] 22/7 possible [12] 62/22 70/13 79/23 80/2 95/2 96/11 139/13 167/3 183/15 192/7 196/6 198/10 possibly [5] 44/1 64/4 115/17 115/18 126/5 Post [1] 123/22 potential [3] 32/9 165/12 165/13

P	159/6 159/8 159/10 159/14 163/13 190/9 190/12 192/20 probably [5] 22/16 42/18 47/11 154/22 156/19 problem [3] 8/8 24/6 53/6 procedure [1] 137/12 procedures [19] 23/7 23/9 109/15 111/2 111/4 112/12 113/19 115/12 116/5 116/20 118/6 131/9 131/10 133/3 136/19 148/19 167/1 170/22 171/8 proceeded [1] 166/3 process [11] 40/14 131/5 131/6 139/3 147/7 152/6 155/1 155/4 157/15 192/9 200/10 produce [5] 25/6 42/19 87/14 91/6 98/21 produced [6] 10/18 23/7 43/10 75/10 175/7 175/13 producing [1] 98/21 production [8] 17/16 75/3 75/5 82/2 87/10 90/8 90/11 90/15 professional [3] 16/11 149/15 149/21 professionally [1] 188/12 profile [1] 32/15 profiling [10] 126/6 126/20 127/6 127/9 127/14 128/5 128/12 128/16 130/10 130/14 program [3] 18/8 64/11 64/12 programs [1] 8/17 prohibited [1] 115/19 prohibits [1] 118/9 projects [2] 18/17 64/23 properly [4] 184/8 185/10 185/11 186/19 properties [1] 49/3 property [19] 44/10 44/10 44/16 52/6 52/11 52/13 52/14 52/20 52/21 54/1 54/2 54/5 54/9 54/16 55/6 63/16 67/10 68/20 134/12 proposing [1] 198/4 protect [1] 116/9 provide [23] 7/13 46/1 48/5 48/22 55/4 55/9 59/14 67/8 99/3 99/8 104/18 114/2 117/16 118/6 118/17 123/3 123/6 128/15 128/19 133/23 158/13 169/14 191/13 provided [2] 61/11 154/13 provides [3] 89/18	135/3 190/12 providing [6] 49/13 49/19 66/18 74/5 74/8 74/10 provision [2] 114/14 128/1 provisions [1] 71/11 provocation [2] 184/6 185/4 proximity [1] 51/8 public [7] 52/13 138/21 141/5 160/23 188/8 202/3 202/21 pull [6] 65/21 126/1 158/6 158/23 168/1 193/10 pulled [5] 72/9 72/18 162/21 189/21 190/7 pulling [2] 164/11 190/8 pulls [1] 129/2 punishment [1] 154/3 purchased [1] 105/14 purporting [1] 46/1 purpose [10] 55/19 56/4 56/9 61/4 61/9 63/15 64/20 65/12 69/10 69/13 purposes [2] 25/4 122/6 pursuant [5] 1/18 111/16 111/19 113/20 202/9 pursue [1] 135/20 push [3] 17/13 81/1 170/4 put [7] 30/15 42/18 76/23 77/5 170/2 179/11 199/14	Q quality [5] 77/9 140/7 142/12 149/11 149/17 quantify [1] 144/13 quell [1] 31/1 question [40] 9/13 9/15 14/22 15/17 17/16 27/7 33/21 36/7 39/1 52/17 56/8 58/7 59/1 59/4 73/13 74/16 82/14 82/16 83/2 83/6 83/8 83/10 83/21 83/23 84/2 91/11 98/2 106/18 106/20 126/7 150/4 150/19 151/12 165/3 170/14 171/8 172/3 174/19 174/21 179/12 questioning [2] 176/5 176/16 questions [19] 9/22 9/23 10/4 38/21 43/20 97/5 97/6 114/22 158/15 158/23 164/4 164/13 164/22 168/21 174/23 192/4 194/4 200/23 201/4 quick [3] 22/20 194/3 194/16 quickly [1] 66/2	Quinn [1] 11/21 quote [7] 123/22 170/9 179/10 179/16 179/18 195/7 197/22 R race [11] 46/11 46/11 123/14 126/14 126/16 126/21 127/5 127/21 127/22 136/23 172/5 racial [22] 126/11 126/20 126/23 127/2 127/6 127/7 127/9 127/13 128/4 128/12 128/12 128/16 128/16 129/23 130/9 130/14 137/6 170/18 170/23 171/9 171/13 171/19 raise [1] 54/10 raises [1] 150/23 ran [4] 63/4 63/8 63/14 70/4 ranging [1] 101/3 ranking [1] 135/19 rarely [1] 197/21 rate [3] 87/14 103/7 103/11 rates [3] 101/2 101/10 101/21 rather [4] 48/12 76/4 76/15 161/14 reach [3] 166/1 180/8 200/16 read [61] 30/16 33/13 33/17 34/18 36/5 45/18 45/19 48/2 53/16 58/7 58/8 59/3 59/5 60/11 64/8 65/19 73/13 73/15 75/21 79/2 80/23 84/3 85/19 87/4 89/7 92/17 92/19 93/1 93/4 93/5 95/15 95/18 95/19 106/20 106/21 112/6 112/9 119/17 120/1 132/12 142/9 150/5 157/8 160/19 162/5 165/13 166/9 169/5 170/3 170/11 174/18 174/20 175/23 178/4 179/5 183/1 185/6 189/18 194/22 196/23 197/16 reader [3] 70/22 81/6 85/22 readers [9] 79/9 79/10 79/14 79/16 79/20 80/2 80/7 81/9 82/1 reading [9] 36/9 84/1 95/13 96/18 146/12 158/12 168/12 169/1 193/1 ready [5] 33/15 53/17 60/12 177/21 181/12 real [3] 13/5 19/11 122/10 really [6] 17/13 101/11 105/7 107/3 108/3 178/21 reap [1] 92/22 rear [1] 190/19	reason [19] 9/12 10/13 15/3 49/22 51/15 94/13 96/4 122/10 122/20 126/22 127/16 127/18 127/20 129/18 163/2 164/9 166/13 184/15 186/17 reasonable [4] 163/17 173/2 190/20 191/2 reasons [6] 29/4 115/21 116/1 166/17 166/21 167/2 recall [105] 14/6 14/6 20/5 25/21 30/11 35/18 41/4 41/20 47/6 47/11 47/12 48/3 54/11 54/14 55/7 55/12 57/11 59/13 59/19 62/21 73/1 73/3 74/2 74/11 74/15 75/4 75/23 88/12 88/15 88/19 90/12 91/17 91/18 92/23 93/18 93/21 95/13 96/18 96/20 96/23 100/1 100/5 100/9 101/22 103/12 104/13 104/17 106/5 107/17 107/21 108/1 108/11 108/20 109/20 114/15 117/2 117/13 117/15 117/20 117/21 117/23 118/16 119/12 121/1 121/16 121/23 122/2 122/23 123/5 123/13 123/20 125/23 128/14 128/17 128/20 128/23 129/12 133/17 133/19 134/19 135/23 141/21 142/22 143/2 143/6 143/6 147/15 149/4 149/7 149/10 150/6 153/9 153/13 153/20 154/12 160/21 169/13 169/16 172/19 178/17 193/9 193/16 196/15 196/16 196/18 receive [21] 29/19 29/21 29/22 30/1 32/2 39/22 59/11 59/18 87/22 88/4 108/12 108/15 118/15 128/11 128/21 143/3 143/19 146/21 146/21 153/18 183/18 received [16] 15/13 29/15 29/18 30/13 41/19 47/8 54/8 144/2 144/22 147/4 154/22 162/7 167/18 170/11 197/21 199/10 receiving [3] 74/2 169/8 188/8 recent [7] 57/5 57/9 57/12 58/4 58/21 60/15 68/18 recently [1] 123/21 recess [5] 53/8 98/14 130/19 165/7 200/6 recognize [1] 23/11
----------	---	--	---	---	--

R	relates [1] 44/23 relative [1] 193/22 relatively [1] 196/9 release [1] 167/20 released [4] 119/7 120/8 121/3 168/7 relevant [1] 123/15 reliance [2] 76/4 76/15 religion [1] 137/1 relying [1] 192/10 remember [9] 20/12 73/14 117/4 118/8 133/15 133/17 133/22 178/11 187/23 remote [1] 8/12 remotely [6] 1/13 1/23 6/1 6/7 6/11 202/8 remove [3] 56/10 76/9 191/1 removed [4] 179/18 179/23 186/18 190/21 removing [1] 186/20 rent [2] 183/7 184/13 repeat [8] 58/5 59/2 83/22 88/2 103/9 136/6 150/2 150/3 repeated [2] 134/13 134/20 rephrase [2] 83/6 83/8 replaced [1] 15/18 reply [1] 169/20 report [24] 3/13 10/22 10/23 11/4 11/5 11/12 25/8 25/13 42/16 42/23 43/16 44/20 45/16 45/16 46/1 46/5 137/16 139/11 191/5 192/17 193/2 195/12 196/23 198/21 reported [8] 1/21 5/21 20/3 20/4 24/17 24/22 25/2 172/11 reporter [10] 6/5 9/10 9/18 58/8 59/5 73/15 84/3 106/21 150/5 174/20 reporting [7] 6/6 6/13 24/12 30/10 40/12 53/22 198/15 reports [16] 25/6 25/11 25/16 25/21 25/22 29/15 29/18 30/7 30/8 30/12 39/22 43/9 43/12 108/13 170/8 188/19 represent [3] 6/15 7/10 38/21 represented [1] 45/8 representing [1] 6/23 request [5] 33/5 55/8 82/6 99/7 106/3 requested [1] 67/11 requesting [3] 60/19 87/7 116/11 require [6] 110/14 112/1 112/20 142/2 170/22 171/9 required [3] 137/11 158/14 191/13 requirement [1] 141/22	requirements [3] 59/12 59/15 113/10 requires [2] 71/9 112/15 resident [2] 48/21 48/22 residents [2] 48/21 148/16 RESISTS [1] 1/4 resolution [1] 185/7 resolve [4] 120/20 152/18 152/19 172/3 resolved [3] 151/15 170/20 177/18 resolving [1] 152/21 resource [3] 18/8 147/5 147/8 respect [2] 55/10 99/5 respectfully [4] 162/12 170/2 189/17 193/14 respective [1] 41/17 respond [5] 21/23 22/2 29/10 48/21 173/15 responded [2] 143/17 161/18 responding [1] 18/14 response [11] 57/5 57/8 58/3 58/13 58/21 69/7 69/20 70/1 169/8 187/5 197/15 responsibilities [3] 18/3 117/18 131/14 responsibility [9] 88/17 109/13 113/9 132/4 135/21 136/12 136/15 150/22 177/8 responsible [8] 18/14 38/4 75/5 109/2 131/21 135/17 137/21 140/6 responsive [3] 106/17 176/8 176/12 rest [2] 100/20 101/16 restraint [1] 160/3 rests [1] 135/21 result [3] 116/10 127/13 197/23 resulted [1] 37/21 resulting [2] 51/22 70/20 results [1] 198/16 retain [1] 151/9 retained [2] 136/11 136/14 retire [1] 13/12 retraining [1] 148/8 retrieve [2] 181/21 184/13 return [2] 106/23 113/18 returned [1] 177/9 returning [3] 183/9 183/12 189/20 reveal [1] 82/21 revenue [19] 78/16 81/9 81/20 84/15 85/5 85/12 86/9 86/13 86/22 87/17 87/23 88/5 88/10 88/17 92/5 93/15 93/19 96/21	108/23 reverted [1] 21/10 review [4] 10/16 35/22 46/22 84/8 reviewed [4] 11/7 46/20 47/20 187/6 revoked [2] 110/13 182/20 reward [5] 89/12 89/16 90/7 90/11 90/15 Richards [5] 175/22 176/3 176/7 176/21 177/3 Richards' [1] 177/6 right [116] 8/18 33/23 38/14 46/2 52/6 57/17 60/17 61/12 61/18 64/23 66/3 67/14 68/23 69/8 69/21 70/10 70/13 71/12 72/10 73/23 74/21 80/19 82/2 84/11 85/23 86/5 87/8 89/10 89/13 92/2 92/6 93/6 93/12 94/21 97/2 97/21 98/17 98/21 105/9 105/12 105/13 105/15 105/23 108/14 109/15 111/13 111/14 112/13 112/17 112/21 113/22 114/4 114/10 114/20 120/13 120/18 124/15 125/15 127/19 129/4 130/22 131/2 132/17 133/3 133/4 137/22 140/6 143/11 143/17 145/21 150/8 150/22 151/10 152/15 154/17 155/19 157/21 158/9 159/1 159/18 159/19 162/7 163/1 163/22 163/23 164/3 164/8 166/22 166/23 167/10 169/19 170/6 171/14 171/20 172/5 172/9 172/13 172/22 173/8 180/5 180/15 183/22 185/11 187/11 193/15 193/16 194/23 195/14 196/7 196/10 197/5 197/9 197/13 198/1 199/1 200/13 Rinaldo [1] 123/21 rise [7] 95/12 96/7 102/3 107/3 108/3 163/13 163/17 road [1] 72/18 roadblock [21] 3/17 57/4 57/8 57/12 57/16 57/21 58/12 59/21 62/1 62/3 62/10 62/11 63/7 70/17 70/19 72/3 72/5 72/7 72/22 161/19 161/22 roadblocks [11] 37/11 37/19 62/22 67/6 67/16 71/15 71/20 72/1 72/17 73/2 73/5 Robbin [1] 175/2 Roberts [70] 60/2 60/7	60/14 61/20 79/6 79/8 79/19 80/6 80/21 85/18 87/1 87/7 87/15 87/21 88/3 88/13 88/15 89/5 89/9 90/13 92/12 92/14 114/18 115/2 128/18 137/20 143/14 143/15 143/19 149/12 153/5 153/9 160/7 162/3 162/20 165/11 165/16 165/21 167/8 167/18 167/19 169/14 170/1 170/8 171/6 171/12 171/17 171/18 172/11 172/15 173/1 173/10 176/20 177/1 177/5 177/12 179/14 179/15 181/2 184/1 184/5 184/22 188/16 188/20 189/15 189/21 190/11 191/10 191/17 196/7 Roberts' [3] 90/10 161/4 192/1 role [22] 13/18 19/6 27/3 27/8 27/11 31/13 36/21 37/1 38/7 39/5 66/19 78/16 96/21 131/1 131/4 140/5 155/1 155/18 161/15 180/17 196/10 198/3 roll [1] 28/22 room [4] 8/22 9/4 9/7 41/12 rose [1] 136/10 rotate [1] 94/9 routine [1] 123/23 routinely [5] 62/4 110/17 114/7 115/21 188/7 rude [5] 176/8 178/10 187/9 195/7 197/4 rudely [1] 180/15 rudeness [12] 146/15 146/18 146/22 176/23 177/2 178/16 180/17 180/19 187/17 196/3 199/1 199/18 ruled [1] 53/23 run [5] 37/12 57/8 58/12 62/22 63/11 running [5] 37/19 65/12 69/6 69/10 69/23 RUST [1] 1/4
			S	
			safely [1] 71/22 safety [6] 47/5 50/20 59/21 61/21 67/18 69/17 said [31] 11/1 11/11 25/2 31/7 58/12 76/7 78/4 85/4 105/9 117/8 119/8 137/14 146/3 158/11 160/8 160/9 168/4 176/11 179/15 180/11 183/16 185/4 185/13 186/16 187/23 191/10 195/21 197/20	

S	38/12 109/7	seized [4] 111/16	199/12 199/13 199/14	slovenly [1] 134/15
said... [3] 202/8 202/10	Scott [6] 181/10	111/19 111/22 113/20	199/21	slowdowns [1] 72/1
202/15	181/14 182/23 183/3	seizure [3] 112/1	she's [7] 178/23	small [2] 23/15 169/2
salaries [1] 89/21	183/23 184/18	112/15 112/20	180/23 181/1 183/9	smaller [1] 63/21
same [19] 14/9 21/20	Scott's [1] 184/10	selected [1] 60/21	187/22 187/23 188/1	smartphones [1] 8/21
26/16 28/1 29/22 63/7	scratch [3] 28/20 86/7	send [4] 73/22 142/6	shift [2] 28/19 95/5	Smith [2] 178/3 194/22
77/10 88/21 112/5	136/13	147/2 194/15	shifts [2] 91/3 91/7	sneakers [1] 186/14
115/4 115/4 133/6	screen [1] 23/16	sending [1] 148/7	shooting [1] 43/11	so [191] 9/12 12/12
175/10 181/14 181/18	scroll [17] 23/20 33/6	sends [1] 151/6	shootings [6] 68/18	12/21 13/6 14/14
182/8 183/1 186/2	35/15 35/16 38/19	sent [18] 32/21 34/19	68/23 69/7 69/14	14/16 15/13 17/5
198/10	43/18 65/20 79/3 79/4	53/12 57/1 65/17	69/16 70/1	17/23 18/15 19/3
sarcasm [1] 162/1	79/4 94/5 100/14	72/20 75/18 75/19	short [3] 77/8 130/16	19/14 20/1 20/3 21/19
satisfaction [1] 170/21	111/8 112/6 146/9	85/7 85/18 94/1 94/3	197/8	21/20 23/3 23/16
satisfied [6] 142/11	157/7 165/12	139/5 154/1 155/7	shorter [1] 77/11	23/19 24/5 24/7 24/10
149/11 149/17 150/9	Scrolling [1] 132/9	155/16 155/19 162/16	shorthand [1] 202/13	25/8 25/16 27/22 28/1
152/18 171/5	seal [1] 202/18	155/16 155/19 162/16	shortly [1] 119/21	33/4 33/17 34/1 34/19
satisfy [1] 151/19	search [1] 56/11	sentence [1] 76/8	should [20] 16/13	35/16 37/19 38/12
saturation [1] 61/3	seat [4] 56/3 172/21	separate [4] 26/8	16/21 16/23 81/8	38/21 42/21 43/18
save [1] 43/8	179/10 181/15	178/14 187/8 198/8	85/11 104/15 106/6	45/10 46/1 48/11 51/7
saw [3] 72/6 141/10	second [23] 22/22	September [2] 103/4	106/11 111/1 114/3	51/15 53/10 57/1
180/12	33/13 65/22 72/13	143/14	120/8 123/11 134/19	60/14 61/4 63/22 65/7
Saxon [2] 186/11	73/9 94/5 112/2	Serafini [22] 53/13	138/3 141/18 149/9	65/10 66/3 66/9 68/16
186/13	112/17 112/18 113/6	53/13 105/1 118/23	179/11 180/17 181/6	69/6 69/23 70/11
say [34] 11/4 12/18	113/22 114/23 117/6	119/15 119/22 128/18	188/11	73/13 73/17 76/14
22/9 22/16 33/22 40/2	136/3 168/2 170/1	137/21 145/17 145/23	shouldn't [4] 50/23	77/15 79/14 80/11
42/17 42/22 43/8	175/19 176/1 177/19	149/18 153/5 153/10	168/7 174/2 174/14	81/7 81/12 83/3 83/5
48/18 69/17 89/14	182/12 182/23 185/19	195/8 196/2 196/7	show [3] 60/20 102/11	83/14 83/20 84/10
101/4 109/10 117/5	195/1	196/10 196/12 196/13	108/13	85/12 87/7 88/20 89/9
124/6 125/8 125/11	secondary [3] 72/10	197/7 198/4 198/16	showing [1] 102/19	92/3 94/6 94/9 94/9
125/14 134/10 138/17	158/6 162/21	Serafini's [1] 196/23	shown [5] 3/5 44/5	95/3 95/19 96/18
139/15 143/7 144/17	section [21] 45/11	64/7 68/12 68/16	44/15 46/12 87/10	97/12 97/12 97/14
152/1 154/6 163/21	111/1 111/1 111/7	175/1 186/1 187/7	shows [4] 24/12 81/18	98/11 98/23 100/14
164/6 164/14 164/14	111/10 111/15 111/21	122/12	100/15 119/5	100/15 100/21 102/13
170/12 171/23 191/8	112/3 112/11 113/18	135/3 154/16 179/1	shut [1] 201/6	102/18 103/16 104/4
193/14	114/6 115/11 115/15	service [4] 44/1 47/16	side [15] 39/17 39/18	104/5 104/8 105/7
saying [12] 9/11 105/5	131/12 131/18 134/7	48/21 134/17	39/21 40/4 72/18	105/12 106/15 108/6
105/5 105/6 120/3	135/1 135/13 136/20	services [5] 48/5 48/8	72/21 74/14 124/15	108/16 110/4 110/9
128/7 128/7 152/13	140/15 148/20	49/9 49/13 49/19	124/18 124/22 126/3	111/6 114/16 115/6
182/10 188/3 188/4	secure [1] 177/9	set [8] 37/11 65/10	143/21 148/17 188/17	115/6 117/12 120/12
192/16	security [2] 18/9 18/13	73/1 73/17 90/23	188/17	120/21 122/6 122/9
says [37] 35/2 35/14	see [49] 14/1 17/20	120/17 174/23 202/9	sides [2] 152/3 152/17	128/3 129/21 131/12
36/2 37/3 38/1 42/4	23/20 28/9 29/6 29/20	setting [5] 34/4 39/10	sign [3] 28/17 28/19	132/1 134/19 136/11
57/4 60/15 60/20	33/1 35/16 36/18	41/23 73/20 74/18	141/23	138/21 139/1 139/13
61/23 69/2 70/20 79/9	38/19 42/8 43/4 43/16	settle [2] 151/2 151/4	signal [2] 126/3 126/8	139/16 139/16 143/14
79/12 81/3 84/13 86/3	45/22 56/19 60/23	settled [1] 150/7	signature [3] 162/11	144/15 144/19 145/9
87/10 89/12 92/19	61/6 62/9 62/19 75/15	Seventh [1] 2/5	162/14 189/16	150/11 151/12 152/1
105/20 111/16 112/5	75/15 84/15 87/13	several [2] 21/9 60/15	signed [4] 19/9 162/9	152/2 152/10 152/16
113/19 116/7 119/3	90/7 90/17 94/7 94/16	severe [1] 44/23	173/6 193/12	152/17 155/17 155/19
140/17 162/12 177/1	94/19 100/14 101/1	sex [1] 137/1	signing [1] 200/15	157/13 158/12 158/19
182/7 183/8 184/5	101/9 102/22 107/2	sexual [1] 137/2	similar [3] 127/4 133/6	158/21 159/8 162/4
184/7 185/9 186/16	108/2 114/11 117/1	Shaffer [1] 67/2	197/8	162/7 162/20 164/6
199/3 199/6	125/20 138/2 140/5	shaking [1] 9/19	similarly [1] 1/6	164/11 165/12 165/16
scan [1] 30/17	143/20 147/17 148/3	shall [6] 111/17 113/21	simply [5] 68/3 124/9	167/12 169/2 169/4
scenario [2] 167/12	156/23 162/11 168/4	114/7 119/7 137/2	127/10 140/11 188/4	170/5 174/2 174/23
184/23	176/11 177/9 179/20	148/22	since [3] 12/10 165/23	175/8 175/11 175/14
scene [1] 8/8	182/10	sharing [1] 40/14	168/6	175/20 176/3 176/19
scheduling [1] 88/21	seeing [4] 35/18 50/5	she [45] 66/11 66/12	single [11] 57/20 81/5	176/23 177/23 178/6
scheduling-wise [1]	73/1 193/16	157/18 158/10 158/11	98/17 98/20 99/17	178/6 179/8 181/1
88/21	seek [1] 31/19	158/13 159/16 159/18	99/22 100/16 101/13	181/14 182/10 182/10
school [18] 17/12 18/7	seem [3] 66/18 112/22	161/18 161/21 162/22	129/16 172/13 187/10	183/3 185/5 185/6
18/8 18/9 18/11 18/14	115/3	163/2 163/3 163/5	sit [1] 18/17	186/13 186/19 188/7
18/17 18/18 20/8	seems [12] 61/9 65/6	163/6 164/2 164/3	site [2] 51/6 106/16	188/23 189/7 189/20
24/12 25/10 27/20	86/7 86/8 87/21 88/3	164/7 164/9 164/10	sites [3] 47/15 48/13	190/21 191/17 191/23
27/21 27/21 27/22	116/11 127/9 161/13	176/11 178/10 178/23	51/19	193/1 193/6 193/12
27/23 147/5 147/8	171/4 171/4 171/5	180/22 183/14 183/15	Sitting [1] 178/18	193/22 194/5 195/10
schools [17] 13/22	seen [13] 23/11 35/17	183/17 185/11 185/13	situated [1] 1/6	196/22 197/3 199/8
13/23 14/1 16/21 17/1	39/3 43/10 47/23 48/1	185/17 186/15 186/16	situation [1] 150/11	199/13 199/14 199/23
17/5 17/17 17/20 18/4	84/18 94/11 100/11	187/4 188/2 188/4	six [5] 98/21 101/12	200/8 202/13
18/7 20/13 22/14	102/13 162/22 196/6	188/14 190/6 190/18	187/8 187/9 196/2	social [3] 43/12 45/16
22/18 25/22 38/9	198/19	190/21 199/6 199/6	size [2] 45/21 169/4	46/5

S	168/20	186/20 189/21 198/22	122/16	122/1
solely [9] 109/18	special [2] 21/4 107/15	198/23	street [5] 28/22 56/10	subscribed [1] 202/17
109/21 111/11 127/5	specific [13] 29/4 32/2	stating [4] 6/15 115/8	95/4 160/8 163/8	substantial [2] 49/2
166/19 170/9 178/21	38/20 43/20 48/11	132/14 185/3	streets [2] 51/8 64/15	102/3
190/15 191/16	48/13 51/2 68/22	station [10] 26/18 28/9	stretch [1] 53/5	substantially [1] 94/17
some [45] 9/21 16/19	71/14 71/19 95/6	28/11 28/14 28/21	strict [2] 36/15 36/22	subsumed [1] 21/20
17/2 17/3 18/13 18/18	114/2 133/15	34/23 135/10 145/1	Strike [168] 3/11 3/12	succeeded [1] 196/7
19/1 30/22 31/1 31/17	specifically [12] 31/23	150/8 199/13	10/21 10/23 11/1 11/8	such [6] 15/23 59/18
31/20 37/17 40/8	36/1 47/11 47/12	statistics [16] 29/19	11/11 13/23 14/5 14/8	92/23 123/23 128/19
41/14 41/15 47/1	48/11 51/13 61/8	29/23 43/5 43/5 75/16	14/12 14/14 14/16	128/21
47/14 56/1 60/21	76/16 102/15 103/21	76/5 76/6 76/7 76/15	14/19 15/20 18/5	sufficient [4] 181/3
61/13 64/12 64/13	143/19 187/23	76/16 89/10 94/7	18/20 19/5 19/15 20/4	192/4 192/17 199/9
66/18 72/8 77/3 89/21	specificity [4] 125/11	94/10 107/1 108/13	20/6 22/14 25/2 25/12	suggest [1] 88/16
102/13 106/14 115/23	125/14 152/1 191/9	130/7	26/1 26/5 26/10 26/15	suit [1] 8/10
116/11 133/10 145/4	specifics [2] 118/11	stats [2] 94/2 129/21	26/20 27/8 27/11 28/2	Suite [1] 2/5
151/18 154/3 154/22	133/18	status [3] 52/18 54/7	28/5 28/7 29/11 29/20	summarizing [1] 35/2
154/22 155/14 157/1	speculate [2] 83/18	168/5	30/2 30/10 30/20 31/2	summary [3] 45/22
175/5 175/11 177/20	83/19	stenographic [1] 6/4	31/6 31/8 31/10 31/14	176/9 181/23
180/23 181/1 188/13	speculating [1] 57/23	step [1] 190/18	31/16 31/19 31/22	summons [6] 37/14
190/6	speculation [3] 83/12	stepping [1] 187/6	32/2 32/9 33/8 34/1	71/1 81/4 81/19
somebody [8] 50/7	83/16 83/16	steps [4] 62/9 71/14	34/7 34/9 34/12 34/20	181/16 197/21
76/9 126/1 128/22	speculative [1] 82/13	71/19 130/8	35/4 35/14 35/20 36/2	summonses [6] 34/10
129/2 134/3 145/2	spending [1] 69/3	Steven [2] 63/22 64/2	36/14 37/3 37/10	72/15 80/1 81/13
191/14	spent [1] 22/13	sticker [2] 110/3	37/20 38/2 38/5 38/13	94/17 113/14
somehow [1] 177/15	spoke [4] 86/20 86/22	111/12	38/17 38/19 38/22	Sunday [2] 92/19 93/1
someone [1] 15/18	171/23 184/5	still [8] 9/23 45/4 77/12	39/7 39/10 39/13	superior [11] 117/22
something [18] 29/10	spoken [5] 117/9	91/8 127/13 146/17	39/16 40/3 41/2 41/23	131/13 131/20 133/2
40/7 44/12 44/23 47/2	199/21 199/21 199/22	183/5 188/21	47/8 55/13 60/8 60/9	135/16 135/18 135/19
67/21 77/7 78/21	199/23	stop [56] 31/20 34/13	60/19 61/6 62/4 63/9	135/22 140/17 141/11
93/15 93/19 102/13	sporadically [1] 25/15	43/19 50/4 50/11	63/12 70/5 70/7 73/4	141/18
110/10 117/8 123/18	sports [1] 95/18	72/10 72/13 72/13	74/20 75/6 75/10	superiors [1] 116/12
134/4 138/7 154/1	squad [3] 30/21 49/1	97/4 98/17 98/20	75/13 76/19 78/12	supervised [1] 26/5
154/4	53/21	99/22 100/16 101/4	79/13 79/15 80/18	supervising [1] 132/15
sometimes [10] 16/22	squads [1] 47/2	101/8 101/13 103/1	81/8 85/1 85/11 85/22	supervision [1] 29/11
25/14 28/17 29/8	square [2] 2/10 45/20	103/5 104/16 122/4	86/3 86/15 86/20	supervisor [5] 117/11
37/15 37/21 63/8	squinting [1] 33/16	122/7 122/9 122/10	87/17 89/10 92/15	135/10 136/3 156/15
63/11 188/3 188/4	Stacy [1] 184/2	123/12 123/16 123/23	93/16 94/4 94/8 96/11	156/21
Somewhat [1] 122/5	staffed [1] 66/3	124/4 126/2 127/12	97/15 99/4 99/8 99/11	supervisors [4] 19/18
son [2] 176/4 177/6	stairway [1] 67/6	127/13 127/15 127/19	99/20 100/2 100/7	19/19 131/13 131/20
son's [1] 176/6	stand [1] 43/22	127/20 128/2 128/3	100/18 101/7 101/15	supervisors/superior [1]
soon [1] 196/9	standard [2] 190/23	128/8 128/10 129/3	102/1 102/5 103/2	131/20
sorry [16] 12/18 34/16	191/4	129/16 158/6 158/15	103/21 104/14 104/18	suppose [1] 175/11
82/15 88/2 91/11	standards [5] 134/14	162/21 164/9 165/17	106/4 106/7 106/10	supposed [4] 62/6
103/8 114/9 114/11	134/21 149/15 149/21	172/13 172/17 178/10	107/1 107/8 107/19	62/15 137/13 154/2
136/6 136/13 158/5	183/13	178/16 190/3 190/9	110/17 113/1 114/13	sure [25] 17/10 24/6
166/11 174/18 175/17	standing [3] 162/17	190/13 191/18 195/7	114/20 115/9 115/14	31/21 42/20 44/1
177/21 179/22	163/12 163/16	195/14 197/5 197/22	115/20 116/12 116/18	50/13 52/8 52/8 52/13
sort [1] 175/18	start [5] 18/4 60/5	stopped [14] 56/12	117/17 119/4 122/14	53/6 56/7 58/5 64/6
sound [4] 43/13 119/10	131/12 138/12 186/9	72/6 73/19 123/14	123/7 123/10 124/14	66/12 66/16 71/22
167/14 169/17	started [3] 28/19 83/2	157/14 157/21 158/1	128/16 133/16 136/16	73/10 89/1 121/12
sounded [2] 117/6	97/10	158/15 158/20 159/7	143/4 143/16 144/1	125/22 126/6 146/8
167/19	starting [3] 6/16 101/9	170/9 172/4 181/15	144/8 144/18 144/22	176/12 182/21 194/4
sounds [4] 98/12	102/5	193/6	147/4 147/9 147/13	surrounding [1] 51/9
157/18 159/16 192/15	state [15] 17/4 71/2	stopping [5] 124/1	147/17 148/3 155/11	suspect [2] 33/10 34/6
source [2] 93/15 93/19	76/2 92/2 141/18	126/22 159/11 190/8	172/11 175/2 176/5	suspected [3] 163/10
South [6] 45/3 125/2	147/23 167/5 171/11	193/4	176/15 176/16	163/12 163/16
125/5 125/10 125/12	173/16 175/4 180/8	stops [24] 33/9 34/6	string [1] 133/5	suspects [1] 34/23
125/15	191/23 201/14 202/4	34/9 34/10 37/22	strong [1] 60/20	suspended [8] 110/12
span [1] 187/9	202/21	49/11 50/6 56/2 58/3	structure [2] 24/15	118/2 181/17 182/6
speak [19] 9/17 60/23	stated [4] 67/5 173/10	58/21 59/12 59/16	26/4	182/7 182/9 182/11
79/18 80/11 81/14	180/3 200/10	99/14 102/18 102/21	studies [1] 71/23	182/20
81/16 86/19 100/2	statement [6] 120/15	122/15 122/18 122/19	subject [11] 7/23 58/2	suspension [2] 181/17
100/6 121/14 128/8	120/21 124/3 146/6	122/22 123/4 123/8	58/20 64/7 66/13	182/10
128/9 137/15 139/15	146/19 149/9	124/14 197/9 199/11	75/19 76/12 86/20	suspicion [8] 157/15
147/11 160/22 161/7	statements [2] 120/12	storage [2] 85/9 111/3	92/16 94/1 165/11	158/2 163/17 179/19
171/20 184/17	148/22	story [1] 76/8	submit [2] 140/18	179/23 190/20 191/2
speaking [11] 9/14	states [15] 1/1 81/23	straightforward [1]	141/13	191/14
36/1 68/22 76/16	92/22 114/7 131/18	188/1	submitted [1] 170/1	suspicionless [3] 58/3
138/19 140/11 162/22	135/14 136/21 143/19	strategies [1] 75/20	subordinate [1] 109/13	58/21 59/9
163/7 163/12 163/16	148/20 165/21 186/13	strategy [2] 61/15	subordinates [2] 59/15	suspiciousless [1]

<p>S</p> <p>suspiciousless... [1] 59/10</p> <p>sustained [2] 153/11 153/14</p> <p>sweep [7] 64/8 64/11 64/22 65/3 65/8 65/11 65/13</p> <p>sweeps [2] 64/20 67/7</p> <p>sworn [2] 7/4 202/7</p> <p>system [3] 21/19 67/8 146/17</p> <p>T</p> <p>tablets [1] 8/21</p> <p>tags [12] 49/12 51/10 51/16 52/11 52/20 75/13 78/17 108/2 108/4 108/6 108/10 108/22</p> <p>take [34] 10/2 10/3 33/12 53/3 62/9 64/8 65/18 66/1 71/14 71/19 76/12 84/8 85/18 88/21 92/1 97/12 100/12 100/13 102/13 118/3 130/8 130/16 132/11 137/15 164/17 164/23 165/6 170/16 176/15 188/13 194/3 194/6 197/16 200/4</p> <p>taken [16] 15/20 23/7 53/8 77/16 98/14 130/19 148/23 149/9 165/7 171/5 178/20 184/11 200/6 202/8 202/10 202/13</p> <p>takes [3] 23/16 121/11 178/23</p> <p>taking [5] 50/22 92/4 92/20 93/2 183/11</p> <p>talk [11] 40/14 41/14 67/21 133/10 138/16 138/18 145/3 152/12 152/13 152/13 196/13</p> <p>talked [4] 75/2 93/2 134/3 148/6</p> <p>talking [4] 131/15 138/11 150/11 150/20</p> <p>tardiness [1] 134/16</p> <p>target [6] 3/12 38/3 38/5 38/18 38/20 38/23</p> <p>targeted [1] 38/2</p> <p>team [2] 64/22 65/3</p> <p>technical [1] 177/20</p> <p>techniques [2] 132/16 132/19</p> <p>telephone [2] 29/12 29/14</p> <p>tell [17] 7/23 8/6 11/7 15/12 18/5 30/20 46/4 67/22 93/4 93/7 105/21 132/21 133/11 139/4 167/21 168/8 169/1</p> <p>telling [2] 88/15 166/16</p> <p>tells [1] 76/8</p> <p>ten [1] 69/14</p>	<p>term [2] 17/9 59/9</p> <p>terms [4] 17/16 140/1 161/10 177/15</p> <p>test [1] 22/20</p> <p>testified [1] 7/5</p> <p>testify [2] 10/13 202/7</p> <p>testifying [2] 7/19 10/10</p> <p>testimony [7] 7/13 128/3 158/21 202/5 202/6 202/8 202/10</p> <p>text [2] 57/4 194/16</p> <p>than [25] 8/17 8/20 11/23 12/3 15/19 19/7 48/12 54/22 72/21 76/4 76/15 81/4 87/12 95/4 95/18 101/16 104/16 105/18 129/17 130/5 144/9 147/5 147/8 161/14 193/23</p> <p>Thank [7] 23/22 24/23 44/2 97/20 161/18 170/15 200/23</p> <p>that [787]</p> <p>that's [46] 17/5 23/18 24/23 32/20 36/8 38/11 42/3 45/13 45/13 46/1 46/2 48/12 52/13 53/6 54/17 56/16 63/19 80/10 80/14 82/17 85/17 88/6 89/3 91/13 91/13 92/10 102/18 110/5 111/21 124/8 131/7 139/10 141/5 160/22 164/16 165/6 169/20 179/4 180/10 186/1 187/1 187/19 188/4 192/3 200/1 200/1</p> <p>theft [2] 44/13 177/17</p> <p>their [38] 28/19 31/20 41/17 46/10 46/15 46/17 47/9 71/18 77/13 78/13 78/16 86/16 88/8 89/21 90/5 95/4 96/15 100/3 101/2 105/13 106/15 116/8 117/18 121/18 131/22 132/6 133/18 138/5 138/6 138/10 140/12 140/18 156/23 157/1 176/6 189/5 191/14 193/4</p> <p>them [64] 17/2 17/5 17/14 25/7 28/19 29/8 30/4 30/13 30/15 30/15 30/16 30/17 30/18 32/13 38/12 39/3 47/4 47/9 48/23 52/9 52/22 69/1 71/9 71/17 75/15 79/18 81/10 86/19 86/22 88/10 89/11 91/8 104/20 105/8 106/14 108/15 116/9 119/8 121/3 126/6 132/20 132/20 132/21 133/11 133/11 134/2 141/21 146/23 147/1 150/7 154/5 154/5 155/14</p>	<p>156/3 156/4 156/12 158/23 158/23 167/1 180/8 186/5 186/7 186/17 188/9</p> <p>themselves [8] 79/10 79/20 80/8 105/14 137/8 139/8 188/7 188/11</p> <p>then [67] 11/11 13/22 14/4 18/4 18/5 19/17 21/19 25/12 26/19 26/23 27/20 27/21 30/4 41/14 44/2 49/22 53/2 69/2 92/4 94/20 106/16 114/22 116/4 127/18 128/1 128/4 133/1 134/15 135/11 136/8 137/16 137/20 137/23 138/7 139/6 139/11 139/18 142/7 143/17 145/23 151/3 151/7 151/7 152/19 161/18 163/5 163/6 164/23 166/3 167/18 173/15 175/23 176/6 177/5 177/5 177/9 179/10 181/16 181/18 181/20 182/12 183/12 184/11 184/12 185/4 190/18 198/8</p> <p>there [114] 9/4 10/13 10/21 14/14 14/15 15/3 15/23 16/22 17/19 21/9 22/9 24/16 26/7 26/7 26/14 26/15 26/17 26/19 30/11 33/21 34/10 35/9 37/17 37/18 38/16 39/18 39/20 39/23 40/1 40/8 40/23 40/23 40/23 41/12 45/3 46/20 50/5 50/7 51/9 54/22 55/2 58/11 58/11 58/12 68/4 68/5 69/3 69/10 69/14 72/20 72/20 73/1 73/19 73/21 76/21 77/13 79/12 85/21 91/18 95/6 95/9 103/8 103/9 107/3 108/3 113/14 114/12 120/21 124/4 125/18 125/22 127/6 134/5 137/18 138/2 139/12 139/23 140/9 141/8 144/5 144/8 144/9 144/15 149/14 149/20 150/18 151/4 154/2 159/18 162/11 163/7 164/2 164/6 164/9 166/9 166/13 166/17 168/17 168/18 175/11 176/23 177/16 180/13 182/16 185/7 186/17 187/7 189/9 189/12 190/12 191/2 191/10 196/2 200/8</p> <p>there's [16] 42/21 49/22 50/6 85/8 113/13 118/2 123/22</p>	<p>133/5 152/1 159/2 159/3 159/6 166/21 191/3 192/21 196/22</p> <p>thereafter [1] 202/11</p> <p>thereof [1] 202/16</p> <p>these [41] 23/19 39/2 39/4 43/9 50/6 62/6 62/12 67/13 69/11 70/1 76/23 77/23 78/2 94/11 108/9 108/13 115/3 116/19 118/23 137/22 143/22 146/4 146/14 150/22 151/17 152/2 152/3 152/10 175/4 178/6 178/12 178/21 180/21 187/11 187/16 188/12 189/4 189/7 194/6 198/1 200/2</p> <p>they [124] 14/18 15/4 15/14 15/16 15/18 21/9 21/19 25/11 25/12 26/1 29/6 30/6 30/8 33/10 34/6 34/9 37/11 37/12 37/13 37/13 37/15 37/16 39/23 41/6 46/14 47/14 47/16 48/22 48/23 51/17 52/13 52/22 52/22 53/2 55/21 56/1 56/2 59/18 62/15 65/2 65/10 70/9 70/12 70/15 71/18 77/11 77/14 77/15 78/16 81/9 81/12 81/12 89/22 91/7 94/13 95/2 95/3 96/6 96/12 99/16 99/18 104/15 105/5 105/7 105/8 105/12 105/14 106/11 106/12 106/15 106/16 108/23 115/23 115/23 116/22 117/1 120/15 121/3 122/9 122/18 122/18 123/11 124/1 124/2 124/18 125/8 126/2 134/3 137/16 138/3 138/5 138/5 139/11 139/14 144/7 144/17 144/19 147/3 150/9 150/9 150/23 151/1 151/16 152/12 152/15 153/6 154/1 154/12 155/19 158/16 159/6 159/7 159/23 163/19 163/21 163/21 165/18 165/23 175/5 186/16 186/23 189/5 193/6 199/4</p> <p>They make [1] 122/18</p> <p>they'd [2] 77/12 79/23</p> <p>they're [15] 50/21 51/17 68/13 85/7 103/19 105/5 105/19 106/8 150/6 152/13 157/22 158/1 160/1 174/22 188/7</p> <p>they've [1] 159/4</p> <p>thing [4] 46/8 63/7 112/6 123/23</p>	<p>things [2] 44/14 78/2</p> <p>think [61] 16/23 17/2 17/4 17/5 17/14 41/21 43/17 52/17 58/2 58/9 65/14 65/14 77/17 78/9 79/19 80/6 82/5 82/11 85/4 86/8 88/6 88/8 97/4 98/2 98/5 102/3 104/3 106/6 106/11 106/17 117/3 119/19 124/8 124/8 130/4 138/5 144/19 145/8 145/9 145/9 145/12 148/6 152/7 156/14 160/15 160/22 161/15 173/17 175/17 178/18 181/2 184/9 184/14 184/22 185/13 188/21 191/4 191/13 196/1 199/6 199/9</p> <p>thinks [1] 161/6</p> <p>third [5] 112/21 112/23 113/6 114/4 118/3</p> <p>Thirteen [1] 21/16</p> <p>this [260]</p> <p>Thomas [39] 114/18 114/19 175/2 175/5 176/4 176/8 177/1 177/2 178/9 178/22 179/5 179/9 179/14 179/18 180/14 180/21 181/11 181/15 183/9 183/18 184/7 185/9 186/3 186/4 186/14 187/7 187/21 188/17 189/23 190/17 194/20 195/6 196/21 197/4 197/8 198/5 198/17 198/22 199/10</p> <p>Thomas's [9] 178/15 183/11 187/13 191/18 195/13 195/18 196/3 196/14 196/17</p> <p>thoroughly [2] 148/21 149/2</p> <p>those [35] 11/20 25/22 29/4 30/1 30/7 30/23 34/10 34/19 43/13 44/3 44/13 48/13 49/11 50/22 58/2 74/2 96/13 102/21 103/3 106/16 109/9 115/21 115/23 115/23 123/3 125/20 135/6 139/1 146/7 151/12 151/15 167/2 173/3 191/22 192/4</p> <p>though [10] 43/2 56/15 108/12 116/2 144/20 146/16 146/23 168/13 173/6 173/23</p> <p>thought [7] 77/1 78/21 131/16 142/19 146/12 178/17 195/19</p> <p>thousands [2] 86/4 197/20</p> <p>three [10] 12/12 27/19 103/5 157/4 164/20 178/7 180/12 180/13 194/1 194/7</p>
--	--	--	--	---

T	202/9	61/21 63/17 67/18	types [4] 44/14 125/20	107/9 109/9
three-page [1] 157/4	times [18] 11/17 27/19	69/17 70/9 71/3 71/12	134/1 146/7	universe [1] 166/21
through [44] 17/2	29/3 72/1 72/20 76/6	72/1 74/21 77/8 77/17	typewriting [1] 202/11	University [1] 97/10
18/22 19/7 25/3 25/5	77/2 81/6 129/15	91/16 91/19 91/21	typical [3] 34/1 41/11	unjustified [7] 172/21
25/18 26/4 27/5 27/16	133/15 140/10 143/8	92/1 92/5 92/16 92/21	42/22	173/11 173/18 174/3
29/14 33/13 36/3 36/5	145/9 145/10 145/10	93/2 93/11 94/17	typically [1] 40/17	174/6 174/14 174/22
37/13 43/9 43/18	150/7 150/9 200/8	94/23 95/12 95/23		unknown [1] 124/4
57/15 57/20 72/5 72/8	tint [11] 104/18 105/4	96/2 96/8 102/8 104/6	U	unlawful [4] 54/5
72/9 78/17 80/8 85/19	105/6 105/10 105/13	110/6 110/8 122/9	Uh [2] 127/3 141/8	110/12 126/1 168/18
86/10 96/21 106/22	105/17 106/3 106/6	122/11 123/23 124/14	Uh-huh [2] 127/3 141/8	unlawfully [4] 105/17
128/23 139/17 150/23	106/12 106/15 106/15	125/3 127/12 130/4	ultimate [5] 135/20	168/6 169/10 184/11
157/16 157/18 157/21	tinted [22] 4/11 99/13	158/8 158/16 158/19	136/11 136/14 150/21	unless [4] 9/22 120/9
158/22 162/15 163/4	99/22 100/3 102/16	159/4 165/17 178/10	151/9	155/16 167/20
163/5 163/6 164/1	102/19 102/20 102/23	178/16 190/3 195/7	ultimately [4] 136/4	unless it's [1] 155/16
164/9 173/9 174/7	103/5 103/7 103/10	195/14 197/5 197/9	136/9 138/8 151/2	unprofessional [1]
194/2 194/6	103/14 103/16 103/19	197/22 199/11	Um [1] 77/7	197/5
throughout [4] 40/16	103/22 104/1 104/5	trafficking [1] 22/4	Um-hum [1] 77/7	unreasonably [1] 71/20
67/7 101/3 124/9	104/16 105/17 106/9	train [1] 132/20	umbrage [1] 188/13	unredacted [1] 46/10
ticket [9] 55/6 98/21	172/12 172/16	trained [1] 118/12	unauthorized [1]	unwritten [1] 123/1
99/14 99/17 104/16	tints [2] 56/3 99/16	training [13] 32/3 59/11	143/16	up [40] 24/8 29/10
129/4 172/16 173/21	titled [1] 60/10	59/14 59/18 118/15	under [11] 7/19 21/22	33/6 35/16 37/11 60/6
174/1	today [14] 7/13 7/20	118/17 123/3 123/6	107/2 132/5 154/15	61/17 62/13 64/15
ticketing [26] 4/11	8/14 9/4 9/11 10/7	128/11 128/15 128/19	156/1 156/8 156/16	64/15 65/10 65/18
54/15 55/10 80/8	10/11 10/14 24/4	128/21 153/19	157/22 160/1 182/18	65/21 69/3 73/1 73/21
96/22 97/2 99/1 99/5	67/21 84/18 120/5	transaction [2] 163/20	underneath [2] 26/20	78/10 81/1 90/23
99/9 99/13 100/3	122/6 178/18	163/21	26/23	115/6 117/7 119/5
100/7 100/11 101/2	today's [3] 10/17 11/15	transcribe [1] 9/11	understand [13] 7/14	119/14 121/21 122/1
101/10 101/16 101/21	11/22	transcribed [1] 202/11	7/16 7/19 9/23 24/7	124/11 131/13 137/19
102/1 102/4 102/12	told [8] 15/5 39/23	transcript [1] 202/12	36/21 48/10 85/10	139/12 150/9 160/6
103/7 103/11 103/14	58/17 119/5 123/21	transcription [1] 202/13	94/3 139/19 159/8	162/6 162/16 165/15
103/22 104/1 107/12	161/21 179/9 187/4	transportation [1]	176/12 184/2	168/1 169/4 170/4
tickets [55] 4/11 49/16	tolerance [4] 36/16	181/22	understanding [2]	176/7 193/10 197/15
50/10 50/12 52/23	36/19 36/22 64/17	treated [1] 180/14	139/3 193/3	upcoming [1] 161/22
54/1 70/10 70/12	tonight [1] 57/5	trends [1] 40/15	Unfortunately [2] 146/3	update [2] 41/16 168/4
70/15 71/7 72/19	too [2] 26/8 51/4	trial [2] 7/14 174/16	146/14	updated [1] 169/9
74/21 75/12 77/13	took [11] 74/13 77/3	trickle [1] 109/10	unfounded [1] 195/10	upon [1] 152/4
78/17 82/6 82/7 91/6	83/5 111/22 117/14	tried [4] 17/4 176/7	uniforms [1] 138/22	us [12] 9/8 21/10 23/8
92/5 95/1 95/12 96/2	176/4 181/19 186/14	180/8 181/7	unit [102] 4/11 11/5	23/16 24/5 65/23
96/8 96/12 96/14	188/17 192/11 196/16	truck [3] 120/9 121/6	14/4 14/8 15/21 18/6	105/6 105/10 134/6
98/16 98/17 99/16	tool [2] 32/6 106/8	121/9	19/6 19/15 22/15 26/2	154/1 181/14 194/6
99/22 100/15 101/4	tools [1] 55/13	trucks [3] 72/22 73/1	26/5 26/9 26/19 27/12	us by [1] 105/6
101/8 101/13 102/16	top [10] 35/14 36/2	121/13	28/2 28/5 28/8 29/12	use [9] 7/16 9/18 41/18
102/19 102/20 102/23	36/12 38/1 38/17	true [2] 60/6 202/12	29/15 29/18 31/5	47/9 61/1 90/20 91/21
103/16 103/19 104/5	45/11 62/1 92/12	trusts [1] 13/5	38/13 41/2 41/23 47/9	132/16 143/16
106/9 106/13 110/9	113/16 198/13	truth [4] 7/23 202/7	47/13 48/4 48/15 49/2	used [6] 7/13 55/13
113/1 129/7 129/16	topic [3] 118/7 118/15	202/7 202/8	51/15 53/13 55/5 55/9	62/4 78/11 106/16
130/1 172/13 172/21	118/18	truthfully [2] 10/11	60/7 63/4 63/8 63/14	141/8
173/3 173/11 173/18	tow [12] 49/22 72/22	10/14	65/7 66/20 67/1 69/6	useful [1] 61/1
174/4 174/10 174/14	73/1 110/14 110/17	try [10] 9/13 77/4 94/9	70/4 70/7 75/6 75/10	using [3] 8/14 41/20
time [68] 8/11 10/2	115/23 120/5 120/9	100/13 102/14 120/20	75/14 78/12 79/13	63/6
12/16 14/9 14/11	121/6 121/9 121/10	144/21 150/7 151/16	79/14 81/3 81/5 86/16	Usually [1] 162/14
15/10 22/13 33/10	121/12	151/18	86/21 87/8 87/17	
43/3 43/3 43/8 43/8	towed [7] 72/23 111/7	trying [1] 91/12	87/22 88/4 88/16	V
53/14 60/8 64/4 66/11	111/17 111/23 113/21	turn [3] 45/15 95/21	93/16 94/5 94/8 96/11	V/T [1] 87/11
69/3 71/18 73/19	114/7 114/19	126/9	97/15 99/4 99/8 99/11	valid [6] 83/13 106/13
74/12 77/11 85/23	towing [14] 109/3	turned [1] 161/22	99/21 100/2 100/8	119/5 120/8 121/2
89/19 91/18 93/1 94/4	109/18 111/3 111/5	turning [2] 24/10 44/9	100/19 101/7 101/11	186/17
94/7 95/1 95/7 95/8	113/19 114/13 115/17	turpitude [1] 134/11	101/14 102/1 102/4	value [1] 193/22
95/9 97/14 97/18 98/9	115/17 115/18 115/21	twice [1] 144/12	103/21 104/15 104/19	various [3] 27/19
100/17 101/3 101/14	117/18 118/13 120/13	two [23] 13/17 18/16	106/4 106/10 107/1	100/16 113/15
102/13 102/21 103/6	120/22	19/4 20/21 21/2 21/2	107/8 107/19 110/17	vary [2] 43/3 46/18
107/13 107/22 108/7	tows [2] 116/19 118/10	23/17 26/7 26/8 66/4	113/2 114/13 122/14	vast [3] 57/15 74/12
108/9 108/21 114/12	Tracey [1] 175/22	79/10 79/21 93/23	123/7 123/11 128/15	124/21
119/11 119/12 134/19	trade [1] 163/1	97/11 101/4 115/3	133/16 136/13 143/4	VAT [1] 112/5
136/20 138/17 149/14	traffic [70] 21/23 32/5	120/12 172/11 178/2	143/16 144/2 144/9	vehicle [58] 33/9 33/9
149/20 150/16 153/9	34/6 37/4 37/9 37/12	178/14 178/20 186/3	144/22 147/4 147/12	49/3 49/6 50/15 50/21
153/13 165/18 178/14	37/22 47/5 49/3 49/7	191/11	147/17 148/3 155/11	56/11 59/12 59/16
178/17 186/2 187/18	50/1 50/15 50/21	two-page [1] 93/23	UNITED [1] 1/1	70/9 71/2 71/12 86/10
190/6 196/17 197/8	55/14 55/21 55/22	type [6] 34/1 42/8 46/7	units [7] 26/12 76/20	87/11 104/6 105/17
198/6 198/8 200/5	55/23 56/1 59/20	46/10 154/3 178/19	100/16 100/18 101/10	110/6 111/2 111/23

V	31/21 32/7 51/3 60/15 violent [6] 44/21 44/22 45/9 60/17 60/22 61/8 virtue [1] 126/21 visibility [1] 56/5 visible [2] 60/20 68/3 visit [2] 28/14 28/20 visiting [1] 28/21 volume [1] 147/12 vs [1] 1/8 VTL [17] 4/14 110/5 110/7 110/15 110/18 111/16 111/19 112/1 112/5 112/15 112/16 112/21 112/23 113/5 113/15 113/20 114/4 VTL 511-b [4] 4/14 110/7 110/15 112/5	38/19 38/19 40/12 43/18 45/16 53/3 53/7 60/20 60/23 66/5 67/8 69/20 70/19 71/22 73/8 73/13 73/14 76/2 76/6 76/23 77/3 78/7 78/10 78/11 94/5 94/6 94/9 95/22 97/6 98/3 100/10 102/11 105/9 108/2 110/22 111/1 111/6 112/6 112/12 114/22 115/6 120/5 124/9 139/13 143/19 145/3 146/3 146/7 146/9 146/14 146/21 146/21 146/23 150/7 150/8 150/19 150/21 151/2 151/3 151/18 152/17 152/19 154/2 154/3 157/7 160/9 164/17 164/23 165/5 166/9 167/1 170/1 175/6 175/18 178/8 180/12 185/18 186/5 188/15 193/18 193/20 193/22 195/2 195/10 197/15 200/1 we'd [1] 79/23 we'll [2] 115/1 119/20 we're [16] 9/7 57/23 65/22 66/2 66/9 68/5 88/20 98/23 124/10 138/19 150/11 150/16 150/17 159/9 185/15 195/5 we've [3] 23/19 185/10 187/6 weapons [2] 22/7 125/10 wear [1] 179/10 weather [1] 60/17 Wednesday [1] 1/16 week [4] 28/6 28/16 143/7 143/8 weekly [2] 25/6 38/1 weeks [2] 79/10 79/21 well [42] 17/9 37/11 45/19 50/4 50/15 50/20 51/4 53/12 61/2 69/4 69/14 76/6 76/21 77/11 83/7 85/7 86/7 89/18 95/21 105/5 106/14 111/21 116/17 119/17 125/15 131/18 137/23 139/3 150/20 158/19 159/6 161/21 162/12 163/21 166/9 168/6 171/18 173/15 180/8 189/12 192/1 199/12 went [9] 19/1 21/19 37/13 39/10 41/23 157/18 175/21 189/12 189/13 were [199] 5/20 10/18 11/9 13/3 13/4 13/15 13/21 14/1 14/16 15/4 15/5 15/23 16/7 16/15 17/6 17/15 17/19 18/3 19/14 19/19 20/15	21/10 21/11 21/13 21/21 22/4 22/7 22/9 22/13 24/16 25/18 25/22 26/7 26/19 26/20 26/23 27/22 28/1 28/21 29/4 29/6 30/6 30/11 30/22 31/22 32/5 32/15 34/10 38/4 39/4 39/7 39/13 39/16 39/23 46/14 47/14 47/16 51/20 54/4 55/16 55/21 56/1 60/3 62/3 62/6 62/10 62/12 62/15 65/8 65/10 69/14 70/8 70/12 70/15 71/15 71/20 72/3 72/17 72/20 72/20 72/23 73/2 73/4 73/14 74/8 74/12 74/23 76/14 76/15 78/12 78/16 82/11 85/1 88/9 90/23 91/2 92/8 94/4 94/8 95/3 95/3 95/4 95/9 96/6 96/12 97/1 97/14 97/15 99/11 99/16 101/2 101/14 101/15 102/19 102/21 103/6 103/8 103/10 104/5 105/6 105/10 106/9 106/13 107/7 107/15 107/22 108/9 108/21 109/2 109/14 113/11 114/14 115/20 115/23 116/18 116/19 116/22 117/1 118/12 119/4 119/16 120/17 121/3 121/17 124/18 125/15 125/22 126/2 129/15 130/9 130/13 135/7 136/1 137/12 140/6 140/9 142/11 144/1 144/6 144/7 144/8 144/9 146/22 149/6 149/11 149/17 151/14 152/4 153/1 154/2 155/19 158/12 158/20 167/8 173/11 174/3 175/1 175/6 175/7 175/11 175/13 176/23 178/6 178/8 178/15 179/16 180/11 180/13 184/10 186/17 186/23 187/4 187/8 187/10 189/5 191/10 191/17 197/23 200/8 weren't [5] 53/2 74/17 105/12 108/18 150/9 WESTERN [1] 1/2 what [131] 7/22 11/7 12/7 12/23 13/4 13/6 13/18 13/21 14/23 15/9 20/7 21/7 21/13 22/11 29/6 29/7 29/20 29/20 30/12 30/20 31/16 36/19 37/6 38/10 39/10 40/11 43/22 44/1 46/4 46/10 47/13 48/7 51/15	52/18 53/1 54/15 55/22 55/22 57/12 61/4 64/11 65/11 67/22 68/6 69/13 72/15 74/23 76/5 76/6 77/2 78/4 80/12 84/20 88/7 91/2 92/8 92/9 94/23 96/15 101/20 102/3 108/21 109/21 110/3 111/19 114/3 115/14 116/20 120/22 123/11 124/1 124/2 124/5 124/10 126/8 126/16 126/20 126/23 131/4 131/11 132/19 132/21 137/12 138/3 138/15 141/1 142/6 146/6 146/13 149/23 151/14 152/12 152/13 154/9 159/8 159/10 160/11 160/15 160/15 161/10 161/17 161/19 162/13 166/13 166/15 169/1 169/18 171/16 176/11 176/13 178/17 180/17 182/6 184/17 186/20 187/20 187/23 189/2 189/4 189/5 190/7 191/7 191/8 191/21 191/22 191/22 192/14 196/5 199/15 200/3 200/17 what's [3] 41/16 195/3 199/17 whatever [2] 42/17 138/17 wheelhouse [2] 80/11 80/13 Whelan [9] 114/18 114/19 115/3 115/7 116/7 120/4 198/14 198/14 198/21 when [84] 8/9 11/1 11/4 13/3 13/12 14/4 14/6 18/3 19/14 21/21 22/13 24/16 28/21 30/12 32/5 33/15 38/9 51/20 53/17 54/8 55/5 60/12 63/14 65/19 67/5 67/10 70/4 70/7 70/15 72/3 72/17 73/19 74/4 76/10 76/14 78/4 79/3 91/18 94/8 95/13 97/1 97/8 111/7 111/8 114/3 114/12 114/18 117/18 118/1 123/11 123/15 124/10 133/1 133/5 133/23 134/19 135/7 135/14 136/1 138/3 139/16 149/14 149/20 149/23 151/13 153/1 153/9 153/21 154/14 155/1 158/16 158/21 160/19 175/18 176/7 181/17 182/20 186/15 187/3 187/19 190/3 193/4 196/12 200/10 Whenever [1] 131/19 where [29] 17/20 27/18
----------	---	--	--	---

W

wait [7] 9/12 9/13
65/22 71/23 72/4
72/12 185/23
waiting [2] 72/18 195/2
waive [1] 6/12
walk [1] 124/11
walking [1] 163/8
want [23] 13/11 17/4
17/11 22/19 27/6
31/10 78/23 83/18
98/7 114/23 116/7
130/16 133/12 133/14
140/16 159/23 175/4
176/11 179/10 184/20
194/3 194/5 196/5
wanted [9] 15/9 15/14
24/1 24/10 65/4 97/6
147/20 148/1 148/2
wanting [2] 76/14
164/12
wants [5] 60/16 115/8
116/9 117/8 158/22
warms [1] 60/17
warned [2] 161/18
161/21
warrant [3] 37/16 50/7
146/17
warrants [1] 37/18
was [390]
wasn't [14] 8/8 24/21
58/13 74/19 104/4
113/2 113/9 143/9
164/8 168/23 177/7
182/15 185/18 192/11
water [1] 53/5
way [33] 48/10 57/12
62/14 72/7 75/9 76/19
77/18 78/6 78/11
82/17 88/9 98/16
98/20 115/14 125/8
129/22 133/13 133/14
134/3 143/9 145/5
145/12 152/19 160/22
161/7 168/1 168/15
176/14 188/4 188/13
193/11 199/9 202/15
we [100] 9/2 9/11 10/2
10/4 16/21 17/14 18/4
22/21 24/8 27/20 33/6
33/12 35/15 35/21

<p>W</p> <p>where... [27] 33/10 34/6 39/13 43/19 60/21 60/23 61/1 64/6 64/12 73/14 75/2 81/2 101/11 107/3 134/1 137/11 139/14 139/16 151/1 151/17 152/18 167/12 168/4 179/20 189/7 200/1 200/1 whereas [1] 107/4 WHEREOF [1] 202/17 whether [45] 39/2 51/22 62/10 62/17 71/6 80/7 81/16 83/7 90/13 90/17 92/23 105/3 105/16 105/22 107/7 115/20 116/12 117/13 121/6 121/11 122/12 129/7 130/9 130/13 133/19 138/9 139/7 139/8 143/7 145/5 147/13 148/10 148/15 153/23 159/18 161/5 168/8 172/3 173/1 174/3 181/5 182/7 185/17 196/16 200/11 which [31] 10/20 20/10 26/5 34/12 45/3 50/16 66/12 70/16 78/4 100/19 100/19 100/21 102/18 103/2 106/23 110/12 111/16 114/6 115/9 119/20 122/7 131/9 131/12 134/7 135/1 136/20 141/15 150/11 175/7 183/6 189/22 while [5] 9/2 9/7 72/4 91/7 122/5 white [2] 129/17 130/5 who [38] 6/15 15/5 19/12 19/19 26/20 26/23 30/21 30/21 32/15 53/19 64/2 65/8 71/1 73/17 117/9 118/3 124/1 126/14 126/16 136/5 137/21 138/9 143/20 152/14 152/15 157/20 161/1 162/23 163/8 166/8 166/10 167/21 168/8 168/14 169/10 184/2 188/8 197/3 who's [4] 139/12 160/23 168/21 175/2 whole [2] 120/17 202/7 whomever [2] 42/18 137/15 whose [2] 184/10 202/5 why [29] 10/13 14/18 16/23 31/2 50/14 57/8 58/10 58/11 67/2 79/15 79/19 85/4 89/15 103/16 104/4 107/12 108/6 121/2 121/6 124/19 164/7 166/17 166/21 170/16</p>	<p>183/14 186/16 187/4 190/21 193/6 wide [1] 81/4 Wilcox [16] 80/18 81/3 81/7 84/7 84/10 84/20 85/4 85/10 85/17 85/21 86/7 86/8 92/13 92/14 92/19 93/5 will [58] 6/6 6/8 6/10 9/13 10/3 23/3 26/18 32/19 37/3 38/1 38/3 38/15 53/7 54/20 56/16 60/1 63/19 65/16 68/12 75/17 80/16 80/22 84/5 84/13 85/15 86/23 87/13 91/21 92/22 94/6 100/10 111/10 111/15 135/2 135/4 135/16 140/18 140/20 140/22 148/19 160/9 165/9 165/12 169/21 170/3 170/5 175/18 175/20 175/23 177/23 178/4 179/5 185/23 186/7 189/18 194/6 196/22 196/23 William [2] 53/12 53/19 Williams [1] 179/4 willing [1] 60/22 wills [1] 13/5 WILNER [15] 2/4 3/3 6/18 7/7 7/9 23/2 23/14 33/12 53/9 66/8 73/16 98/15 130/20 165/8 200/7 window [8] 4/11 99/13 99/14 102/16 102/23 103/7 103/10 172/16 windows [16] 99/22 100/3 102/19 102/20 103/5 103/14 103/16 103/19 103/22 104/1 104/5 104/16 105/16 106/9 106/12 172/12 wise [1] 88/21 wish [1] 83/8 wishes [1] 173/22 within [13] 13/7 20/7 21/17 40/2 48/16 50/2 51/3 51/8 51/8 51/23 55/10 96/17 130/12 without [13] 62/23 63/12 70/4 105/17 111/21 143/22 143/23 157/14 158/1 171/13 172/8 173/7 181/20 witness [13] 3/2 3/5 6/6 72/17 72/22 74/10 82/21 83/5 83/17 83/19 149/8 202/5 202/17 witnessed [3] 163/21 199/1 199/3 witnesses [5] 148/21 148/22 149/5 176/16 180/6 woman [4] 160/8 160/12 161/5 161/12 wonderful [1] 201/9</p>	<p>wondering [1] 97/8 word [1] 83/3 words [1] 148/1 work [18] 12/7 12/17 26/1 29/2 30/22 38/7 38/12 41/19 81/12 81/19 86/16 87/16 88/23 91/8 115/10 133/13 134/4 181/22 worked [7] 12/16 12/18 18/9 18/16 39/4 125/18 144/18 workers [1] 64/13 working [9] 13/3 21/21 85/22 89/22 90/2 90/4 91/3 91/7 183/15 works [1] 22/21 world [1] 78/4 would [276] wouldn't [8] 68/10 77/15 77/15 100/11 104/3 124/21 138/21 174/16 write [13] 37/14 49/16 54/1 71/1 71/7 71/9 80/1 81/13 98/17 110/9 113/14 129/3 129/7 writes [1] 81/4 writing [9] 49/12 50/1 75/23 77/13 81/19 96/12 104/11 140/18 141/14 written [11] 10/6 104/5 110/22 114/2 122/21 129/10 141/19 141/20 143/21 159/16 197/20 wrong [6] 88/16 159/2 164/2 164/3 175/15 188/3 wrongdoing [1] 158/2</p> <p>Y</p> <p>yeah [42] 17/9 19/17 20/5 23/18 25/5 36/4 36/10 42/17 42/17 45/13 48/19 56/23 60/9 61/9 62/15 76/17 77/22 93/14 94/19 94/19 98/1 100/23 108/15 108/17 108/17 109/6 111/1 111/5 111/5 112/18 124/4 126/5 131/11 132/3 139/10 151/11 155/12 165/20 180/1 181/13 182/1 194/1 year [4] 20/12 20/17 21/6 187/10 years [11] 12/12 13/2 13/17 14/3 20/21 21/2 21/2 21/16 48/3 97/11 160/21 yellow [2] 44/2 100/19 yes [218] yet [1] 112/23 YORK [6] 1/2 1/14 2/5 2/5 2/10 71/2 you [739] you'd [3] 77/4 132/11</p>	<p>201/7 you're [38] 31/7 33/15 39/2 48/11 50/4 50/5 50/15 50/22 51/5 51/7 52/3 53/17 54/19 60/12 65/19 77/22 87/1 89/6 108/20 119/23 120/3 124/1 124/5 126/5 126/21 131/15 133/13 137/11 152/7 162/17 166/18 182/10 189/17 192/16 192/19 192/20 195/3 200/19 you've [3] 51/6 102/13 152/8 young [1] 17/7 your [113] 6/14 6/15 6/15 8/3 8/11 9/1 9/5 9/19 9/21 11/14 11/19 11/23 12/3 12/23 13/18 14/23 17/16 18/2 19/5 19/6 19/14 20/7 21/17 21/22 22/13 26/1 27/3 27/5 27/8 27/11 27/15 27/18 29/5 29/11 35/19 36/21 38/7 39/5 41/19 46/9 48/13 50/8 51/20 54/9 59/15 59/20 66/17 69/20 75/9 76/22 81/15 83/2 88/7 89/18 91/13 93/20 94/23 95/15 97/8 105/3 107/18 111/15 113/9 113/11 114/6 117/22 122/1 123/18 126/10 126/20 126/23 128/3 130/9 130/13 131/4 132/5 133/9 134/22 135/7 135/23 139/4 139/15 140/5 141/20 143/10 147/11 148/7 149/23 149/23 150/20 151/8 151/8 151/20 154/15 156/1 156/8 156/17 158/21 166/6 167/22 169/8 170/5 174/9 174/10 175/7 177/12 179/11 187/20 189/8 189/8 193/2 193/3 195/2</p> <p>Z</p> <p>zero [4] 36/16 36/19 36/22 64/17 zip [2] 129/15 129/17 zoom [3] 8/14 8/17 23/19</p>
--	--	--	---