

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

AMERICAN NEWS & INFORMATION SVCS.
INC. and EDWARD PERUTA
Plaintiff

vs.

JAMES C. ROVELLA, MICHAEL COATES,
BRANDON J. O'BRIEN, SEAN SPELL,
BRIAN FOLEY, ET AL.
Defendants

*
* CIVIL ACTION NO.
* 3:15-CV-01209-RNC
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* MARCH 22, 2017
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VIDEOTAPE DEPOSITION
OF
JACQUELINE MANNING-BAINER

Taken before Patricia Tyszka, Registered Merit Reporter and Notary Public, in and for the State of Connecticut, pursuant to the Federal Rules of Civil Procedure, at the Law Offices of Rachel M. Baird & Associate, 15 Burlington Road, Harwinton, Connecticut, on Wednesday, March 22, 2017, commencing at 10:03 a.m.

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Transcript Legend

- [sic] - Exactly as said.
- [phonetic] - Exact spelling not provided.
- [...] - Indicates omission of word[s] when reading OR trailing off and not finishing a sentence.

Direct Examination by Ms. Baird	6
Cross-Examination by Ms. Harris	90
Cross-Examination by Ms. Feola-Guerrieri	103
Redirect Examination by Ms. Baird	114
Recross-Examination by Ms. Harris	128
Continued Redirect Examination by Ms. Baird	131

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LIST OF EXHIBITS
[Marked for Identification]

JACQUELINE MANNING-BAINER

PLAINTIFF

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
62	Subpoena	6

**REPORTER'S NOTE: Original exhibits retained
by Court Reporter.

S T I P U L A T I O N S

1
2
3 It is stipulated by the Attorneys for the
4 Plaintiff and the Defendant that each party reserves the
5 right to make specific objections in open court to each and
6 every question asked and the answers given thereto by the
7 witness, reserving the right to move to strike out where
8 applicable, except as to such objections as are directed to
9 the form of the question.

10 It is stipulated and agreed to the adequacy of
11 the notice.

12 It is stipulated and agreed between counsel for
13 the parties that the proof of the authority of the
14 Commissioner before whom this deposition is taken is
15 waived.

16 It is further stipulated and agreed that the
17 Deponent will read and sign the deposition transcript.
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JACQUELINE MANNING-BAINER,
Deponent, of Integrated Security Services, 40 Russ
Street, Hartford, Connecticut 06106, after first
having been duly sworn by the Court Reporter,
testified under oath as follows:

DIRECT EXAMINATION

BY MS. BAIRD:

Q So good morning, Ms. Bainer.

A Good morning.

Q My name is Rachel Baird, and as you indicated
out in the lobby, we have met before. It's been a while,
though.

A It has been long.

Q It has been. I'm going to show you a document
which is a subpoena for you to testify here today.
Actually we should have it marked.

[Plaintiff Exhibit 62: Marked for ID.]

BY MS. BAIRD:

Q If I can have the copy that's not marked.

A Sure.

1 Q Thanks.

2 So the document that's been marked Exhibit 62,
3 did you receive this subpoena to appear here today?

4 A Yes. I didn't accept it in-hand, but my
5 representative from my office did.

6 Q Okay. And are you accompanied by counsel today?

7 A No.

8 Q Did you know that you do have the right -- I
9 guess I could say "the right" -- to have counsel here with
10 you today during this deposition?

11 A Sure.

12 Q And you've chosen not to do so.

13 A Correct.

14 Q Have you ever been through a deposition process
15 before?

16 A I've testified.

17 Q Okay.

18 A In court. But no, I haven't ever been deposed
19 in a conference room.

20 Q So as noted on Exhibit 62, we indicated that the
21 deposition will be recorded by stenographic and
22 video/audio recording. Did you notice that?

23 A Yes.

24 Q And so to my right is the stenographic court
25 reporter.

1 A Okay.

2 Q And there is a camera directly in front of you
3 that's recording this deposition by video and audio.

4 A Yeah.

5 Q So you're aware of that.

6 A I'm aware of that.

7 Q If you have any questions during the course of
8 this deposition, please bring them up because we want to
9 make sure that you understand the question and that there
10 aren't any issues that are preventing you from accurately
11 responding.

12 A Understood.

13 Q If you need a break, ask for a break --

14 A Okay.

15 Q -- we have restrooms, we have some water. And I
16 don't anticipate this will go past the lunch period --

17 A Great.

18 Q -- so we won't have that issue to contend with.

19 A Thank you.

20 Q Do you have any questions before we begin?

21 A No.

22 MS. FEOLA-GUERRIERI: Are you going to
23 explain read and sign?

24 MS. BAIRD: Yes. Thank you. Thank you.

25

1 BY MS. BAIRD:

2 Q There will be a copy of this deposition printed,
3 and that copy will be provided to you and you'll have a
4 chance to read through it.

5 A Okay.

6 Q And if you want to clarify anything or add
7 anything, there's what's called an errata sheet at the end
8 of the deposition, and you'll be able to put the page
9 number and any comments you have about a particular line
10 on that page number.

11 A Excellent.

12 Q And it will explain to you in the errata sheet
13 what you can do. And I don't quite know -- I don't know
14 if I've ever done a deposition with somebody
15 unrepresented. I'm not quite sure how you get the copy of
16 the deposition transcript. I guess I would get it and
17 provide it to you?

18 A Sure.

19 Q Yes. So I think that's what will happen. Okay?

20 A Okay.

21 Q And if something different happens or if we're
22 advised differently during the break by the reporter, I'll
23 let you know.

24 A Great.

25 Q What is your --

1 MS. FEOLA-GUERRIERI: So I mean just to
2 clarify, I think she is choosing to read and
3 sign the transcript.

4 MS. BAIRD: Oh, yes. Yes.

5 THE WITNESS: Yes.

6 MS. FEOLA-GUERRIERI: Instead of waiving
7 your right to do that.

8 THE WITNESS: Oh, correct. Yes.

9 MS. BAIRD: Exactly.

10 THE WITNESS: I will definitely read
11 through it and make notations of anything that I
12 have -- you know, need to clarify.

13 MS. BAIRD: Right.

14 THE WITNESS: Absolutely.

15 BY MS. BAIRD:

16 Q Okay. Your name is currently Jacqueline Bainer;
17 correct?

18 A Correct.

19 Q Now, at one point you were known as Jacqueline
20 Manning-Bainer?

21 A Yes. Well -- so I have been Jacqueline Manning
22 for 42 years until I got married basically, so all my
23 clients knew me as Jacqueline Manning. So I just chose
24 to hyphenate my name in my e-mails so that people would
25 know that it was me e-mailing them instead of seeing

1 Jacqueline Bainer. And so, yes, I continue to use
2 Manning with hyphenated even though that's not my legal
3 name. My legal name is Jacqueline Bainer. I changed it
4 in 2014, I think. In the summer of 2014 I believe I
5 changed it.

6 Q Thank you for that clarification, and I'll call
7 you Ms. Bainer for the course --

8 A Thank you.

9 Q During the course of this deposition.
10 Where are you currently employed?

11 A Integrated Security Services.

12 Q And what is Integrated Security Services?

13 A It's a private detective agency and security
14 agency, and the headquarters is in Manhattan and we have
15 local offices here in Connecticut: In Hartford and in
16 Norwalk.

17 Q Where is your office located?

18 A 40 Russ Street, Hartford, Connecticut.

19 Q And is that the address you prefer to be used
20 for the purposes of this deposition and case?

21 A I do.

22 Q How long have you been employed by -- can I call
23 it ISS?

24 A Sure. Absolutely.

25 Q How long have you been employed by ISS?

1 A Since October 19th of 2009. So approximately
2 almost eight years.

3 Q Have your job duties and responsibilities
4 remained consistent over that eight years?

5 A Until last summer they were. I was the managing
6 director of the office and tasked with overseeing all of
7 the investigations that came in from the State of
8 Connecticut and clients in the State of Connecticut.

9 Q And you were -- you were the managing director
10 during the eight years -- well, through, what did you say,
11 last summer --

12 A Through May of 2016; yeah.

13 Q And how did those duties change in May of 2016?

14 A I went on a TV show, so basically I -- it was a
15 very intense filming process, and I had to step down and
16 relinquish my duties of running the office because it was
17 a filming period of more than a month.

18 Q And is that filming period still going on?

19 A No, it's ended. And then I returned to the
20 office and worked on cases as a private investigator and
21 was negotiating a new contract with my -- with ISS, the
22 CEO, for my current position that I have right now.

23 Q And is the CEO named Alan --

24 A Schisselle [phonetic].

25 Q Schlissel.

1 A No. Schissel.

2 Q Schissel. Has he been the CEO during your
3 entire eight --

4 A Yes.

5 Q -- years?

6 COURT REPORTER: Could I just ask you to
7 wait until she finishes a question completely
8 before you answer so that way I can get you
9 both.

10 THE WITNESS: Absolutely.

11 BY MS. BAIRD:

12 Q I forgot to tell you that. I'm supposed to tell
13 you that.

14 A Okay.

15 Q Now, what is this TV show that you've
16 referenced? I have to ask since you brought it up.

17 A It's on CBS. It's called "Hunted." It's a
18 reality TV show in which people attempt to hide and go
19 off the grid, so to speak, away from electronics and
20 things like that, and then investigators attempt to track
21 them down and catch them.

22 Q Is this a TV show that is currently aired on
23 CBS?

24 A It aired. The season finale was March, I think,
25 1st? It was the -- first Wednesday in March was the

1 season finale, but I'm still in a contract to go back if
2 they renew for a Season Two.

3 Q How many episodes were in Season One?

4 A Eight.

5 Q And did all eight episodes air?

6 A All the episodes have aired, yes. Correct.

7 Q Is anybody else from ISS involved in the show
8 that -- it's called "The Hunted"?

9 A No, it's called "Hunted."

10 Q "Hunted."

11 A Yeah. And -- no, there's a -- my partner who
12 was on the show with me, he was a former Integrated
13 employee, so he did work private investigations for us.
14 That's how I met him. But then he left in 2012 to pursue
15 an independent military contracting job.

16 Q And what is his name?

17 A Paul Rossi.

18 Q So currently are you working for ISS?

19 A I'm currently working for ISS as a 1099 employee
20 as the Director of Communications, which is basically on
21 marketing. I'm doing a lot of marketing materials and
22 sales for the company.

23 Q Are you currently employed as a 1099 employee by
24 anyone else other than ISS?

25 A Yes, by the TV show. Well, I'm not really

1 employed, but I'm under contract, so I would have to go
2 back.

3 Q Okay. Besides the TV show and ISS, any other
4 current employment?

5 A It's not employment, but I am working on a TV
6 project in development currently. But it hasn't been
7 sold to a network yet, so I'm not getting paid for that,
8 but it is a project I'm working on.

9 Q Who replaced you as the managing director in May
10 of 2016?

11 A Carrie-Jo McGuffey.

12 Q And is that C-a-r-y?

13 A C-a-r-r-i-e, hyphen, Jo -- J-o -- McGuffey --
14 M-c- capital G -u-f-f-e-y.

15 Q When you were the managing director through May
16 2016, is it fair to say that you also performed
17 investigations?

18 A Absolutely.

19 Q And in May -- I'll go May of 2016 when you were
20 last managing director, who else in your office performed
21 investigations at the Russ Street location?

22 A In May of 2016? We have Kristin Brazalovich.
23 Would you like me to spell her last name?

24 Q I know the court reporter would.

25 A B-r-a-z --

1 COURT REPORTER: Is it on your Web site?

2 THE WITNESS: It is. No. No. No. I'm
3 sorry. She is not on our Web site. She is not.

4 A B-r-a-z-a-v-i-c-h. I think.

5 BY MS. BAIRD:

6 Q Anyone else?

7 A Carrie-Jo McGuffey was performing investigations
8 and she still is. Who else was in our office in May of
9 2016? That would be Alaina Underwood. I'm just trying
10 to think back May 2016 and who was with us when I left
11 for filming. Amanda Tattersall, who, for the record, is
12 my daughter. She was just performing administrative
13 background checks. And she's the office administrator.

14 Oh, I can't really remember who else --

15 Q Well, you know, this is a deposition, so if you
16 recall things later --

17 A Okay.

18 Q -- you can bring them to our attention. I mean
19 obviously you're sitting there with no notes or
20 documents --

21 A Right.

22 Q -- so it may be hard to remember certain things.

23 A Yeah, I'm not sure if there was anyone else that
24 was on staff conducting investigations at that time. I
25 know that we used subcontractors. There's a

1 subcontractor that we used at the time too.

2 Q And that's also the reason for the errata sheet.
3 When you're reading through the deposition, you think of
4 things to add, you can do that as well.

5 A Sure.

6 Q The people that you've named that you recall
7 this moment, Carrie-Jo McGuffey, was she there in the fall
8 of 2014? And when I say "fall," I mean basically between
9 September 2014 and December 2014.

10 A I believe she -- she was. However, she at the
11 time had her own private detective license so we were
12 subcontracting her. But we were giving her a lot of work
13 and she was working pretty closely with us, and I believe
14 that she was there in -- at that time frame. I could be
15 wrong, though.

16 Q How about Alaina Underwood? Was she there in
17 the fall of 2014?

18 A No.

19 Q And Carrie --

20 A Kristin Brazalovich?

21 Q Yes. Kristin Brazalovich?

22 A Kristin has been with us since -- she's been
23 with ISS since before I even started.

24 Q And when you started, it sounds like you
25 immediately had the position of managing director?

1 A Correct.

2 Q And Carrie-Jo McGuffey was, was she there in the
3 fall of 2014?

4 A I think you just asked me that and I was not --
5 and I'm not positive, but I believe that she was.

6 Q Okay.

7 A And she would have been there in a
8 subcontracting capacity.

9 Q How about Christine Brazalovich?

10 A Kristin, yes.

11 Q Yes. Okay. Got it.

12 Among the investigators at ISS at the Russ
13 Street location, were assignments divided in any way?
14 For example, particular agencies or organizations were
15 given to one investigator and others given to other
16 investigators?

17 A Generally we like to be consistent in the terms
18 that if a particular lawyer worked -- liked working with
19 a specific investigator, then yes. In the case of the
20 City of Hartford cases, Kristin Brazalovich was the
21 primary investigator on a lot of the cases.

22 There's one other person that was I believe with
23 us in 2014 that I just recalled, and that is I believe
24 Desiree Gardner, who is currently with us now. And I do
25 think that she started -- she might have started at that

1 time.

2 Q How about a Diane Ferraro?

3 A Oh, she was the office administrator, yes. She
4 worked from -- I don't remember, but I -- she worked
5 there for about two years and she was the office manager.

6 Q Did she do any investigations?

7 A She did some, you know, administrative like
8 background checks by procedure, which we, of course, then
9 looked over. But she didn't really speak to people. She
10 served process too in her downtime.

11 Q And were there any -- and I don't want to talk
12 obviously about jobs for private attorneys --

13 A Right.

14 Q -- because I understand there's confidentiality.
15 Were there any government agencies that you primarily did
16 work for through May 2016?

17 A Well, I wouldn't say government agencies. I'll
18 just explain and you can define that however you like.

19 So at the Office of the Chief Public Defender of
20 the State of Connecticut there's often conflicts with
21 co-defendants and they assign cases to assigned counsel.

22 (Gesturing.) They are private attorneys who take
23 contract work for the state and they would hire us.

24 So the State of Connecticut would pay us for our
25 investigations, but we were under the -- we were not

1 under any type of specific contract, we would just do
2 work with assigned counsel appointed to represent the
3 defendant. And in many of the cases it was the
4 petitioner in writs of habeas corpus.

5 Q And did you do that kind of work?

6 A Oh, yes. Yes. I cut my teeth on that kind of
7 work. That's my first love.

8 Q And are you familiar with the Hartford Civilian
9 Review Board?

10 A Yes.

11 Q Did you perform any investigations on behalf of
12 or for the Hartford Civilian Police Review Board?

13 A Yes.

14 Q Approximately how many?

15 A Well, I oversaw all of them from the time that I
16 came on in 2009 to -- until the time I left in 2016. So
17 I oversaw and managed all of them and I was responsible
18 for reviewing the final reports. If the investigators
19 came to a conclusion that I did not agree with, I would
20 change the findings or support them in terms of just
21 issuing the final report and looking at all the facts
22 over again. And there was times that I actually did do
23 the investigation myself where I interviewed the
24 complainant, looked at the evidence and came to a final
25 resolution to the best of my ability.

1 Q If I could have Exhibit 61C.

2 On the subpoena that we marked at the beginning
3 of this deposition as Exhibit 62, it asked you to bring
4 the -- well, it asked you to testify with regard to the
5 investigation conducted by ISS, Hartford Police
6 Department I.A. Case No. 14-100. Do you see that on the
7 subpoena --

8 A I do.

9 Q -- Exhibit 62?

10 A I do.

11 Q And I just handed you Exhibit 61C. And if you
12 could look through Exhibit 61C and indicate whether the
13 five reports and then the last two pages of e-mails are,
14 in fact, related to that Case No. 14-100.

15 A Yes.

16 Q The first page of Exhibit 61C is marked as
17 Report No. 1 in the upper right-hand corner. Do you see
18 that?

19 A I do.

20 Q And what is -- what is the procedure, if there
21 is a procedure at ISS, for numbering reports?

22 A We use a proprietary database and so we don't
23 necessarily number them ourselves, but as we open new
24 reports within the database it populates the number of
25 the report into that. So there would be five open

1 reports in our database and the database numbers them.

2 Q Is it fair to say that Report No. 1 would
3 indicate the initial work done in a case?

4 A It's the intake basically. Going down to the
5 City of Hartford, picking up the case and entering all of
6 the information into the database about whatever the
7 city's provided in their intake sheet.

8 Q And the date on Report No. 1 of September 17th,
9 2014, does that indicate the date that the work was
10 performed that is detailed on Report No. 1?

11 A It should be the date that it was picked up and
12 entered into the system.

13 Q Are you the one that performed or gathered any
14 of the information contained on Report No. 1 in
15 Exhibit 61C?

16 A No.

17 Q Do you know who was?

18 A This would be information that came directly
19 from the City of Hartford's Civilian Review Board
20 complaint that we received and picked up at the office.

21 Q And when you say "picked up at the office" --

22 A Corporation Counsel.

23 Q And the assigned investigator on Report No. 1
24 was Diane Ferraro?

25 A She is the office administrator, so she did the

1 intake. She did the work that was in this report. She
2 did the intake.

3 Q I'm going to provide you as well another
4 exhibit, 61A. What documents or records or source was the
5 information gathered from that appears on Report No. 1 in
6 Exhibit 61C?

7 A I'm sorry. Can you repeat that?

8 Q What document or records or source was the
9 information that's contained in Report No. 1 in
10 Exhibit 61C gathered from?

11 A From this complaint form.

12 Q Okay. And is the complaint form that you're
13 referring to the first page of Exhibit 61A?

14 A Yes.

15 Q Are you familiar with that format of document
16 that is in Exhibit 61A on the first page?

17 A Absolutely.

18 Q And is that a document that you're familiar with
19 as receiving from the City of Hartford regarding
20 complaints?

21 A Correct.

22 Q Has that document changed over time?

23 MS. FEOLA-GUERRIERI: Objection to form.

24 You can answer if you understand the
25 question.

1 A Not to my knowledge. It seems like it's always
2 been this way.

3 BY MS. BAIRD:

4 Q And just to clarify, the first page of
5 Exhibit 61A has a date of September 16, 2014, on it. Do
6 you see that?

7 A I do.

8 Q And have you received any Full Complaint
9 Information documents from the City of Hartford related to
10 Civilian Review Board investigations since 9/16/2004 --
11 2014?

12 A You mean have we received additional cases?

13 Q Yes.

14 A Oh, yes.

15 Q And do you know if this Full Complaint
16 Information form, the first page of Plaintiff's
17 Exhibit 61A, is used -- has been used in subsequent
18 cases that --

19 A Consistently.

20 Q And just sticking to the first page of
21 Exhibit 61A, is it -- I'll -- this one that was received
22 with a date of 9/16/2004. Is this by e-mail or fax or you
23 pick it up?

24 A We pick them up. We have to sign for them.

25 Q And then going on in Exhibit 61A to the second

1 page with the title of Citizen Complaint Form, is this a
2 document that you can tell from the first page of
3 Exhibit 61C that you received at the intake?

4 A Yeah, I would assume so, as long as this is the
5 same document that I signed for. But it looks like a
6 complaint I would receive, and absolutely I remember this
7 particular case.

8 Q So the first page of Exhibit 61C, the Report
9 No. 1, where would the information about the complaint
10 number be obtained?

11 A Information about the complaint number?

12 Q Yes. In No. 1 under "Details."

13 A Well, it's in the box here "For Office Use
14 Only" where it would say "IAD No. CC2014" --

15 Q Okay. I see that on the second page of
16 Exhibit 61A.

17 A Oh, you're referring to the first page?

18 Q No, I'm just confirming. You had mentioned
19 information, so I do see what you're referring to, I
20 believe, on the Citizen Complaint Form which is the second
21 page of Exhibit 61A?

22 A Yes.

23 Q And then the I.A.D. No. 14-100, would you have
24 obtained that from the Full Complaint Information page,
25 first page of Exhibit 61A?

1 A If it's contained. At times there's not an
2 I.A.D. number on the first page because the city assigns
3 it their case number, and it hasn't always gone through
4 Internal Affairs to receive a case number before we sign
5 for it.

6 Q Okay.

7 A So there have been times where I've had to
8 request an I.A.D. number.

9 Q And who would you make that request to?

10 A Whoever is in charge of the Internal Affairs
11 Division.

12 Q At the Hartford Police Department?

13 A Correct. And at that time I believe it was
14 Anlinda Thomas.

15 Q And would your investigation then proceed at the
16 same time, as far as you knew, as the I.A.D.
17 investigation?

18 A Yes. They're parallel investigations.

19 Q And has it been that way since you became
20 associated with ISS in 2009?

21 A That's correct. And I always advise the
22 complainants that Internal Affairs is going to be
23 conducting their own investigation and we'll likely be
24 contacting them, but that we are not affiliated with
25 them.

1 Q With regard to the investigation conducted as
2 reflected on the first page of Exhibit 61A, Case
3 No. 2014-1475, did you collaborate with Internal Affairs
4 at all in your investigation?

5 A What do you mean by "collaborate"?

6 MS. FEOLA-GUERRIERI: Objection.

7 BY MS. BAIRD:

8 Q Did you gather information from Internal Affairs
9 at all in the course of your investigation?

10 A Yes. We generally -- I think in this particular
11 case the only information that I needed -- which I see
12 the officer's name is listed on the intake form, but it
13 didn't get documented as such in our report, so I was
14 looking to identify the officer. So I did in this
15 particular case send correspondence to Internal Affairs
16 asking them to identify the officer.

17 Q Okay. Let me catch up with what you just said.

18 A Sorry. Sorry.

19 Q So you're referring to the first page of
20 Exhibit 61C, Report No. 1, under "Details," No. 11, list
21 of accused officers?

22 A Correct.

23 Q Where it states "Officer Unknown"?

24 A Unknown; correct.

25 Q So at the time of the intake it appears that the

1 officer was listed as unknown.

2 A Yes. At my office, through Diana. There is a
3 reason she is not with our company anymore, but --

4 MS. FEOLA-GUERRIERI: Well. This is also
5 dated April 27th of 2015 --

6 THE WITNESS: Yeah, and I'm not --

7 MS. FEOLA-GUERRIERI: -- and we've already
8 heard testimony that this is updated as the case
9 proceeds.

10 A Yeah, and I just don't recall that -- I don't
11 have the actual complaint form that I received. I didn't
12 have a copy of that. But it's -- then I guess it is
13 possible that this did say "unknown" at the time I -- at
14 the time that my office signed for it.

15 BY MS. BAIRD:

16 Q Okay. So let me clarify that. The first page
17 of Exhibit 61C, who filled out the information next to the
18 details 1 through 13?

19 A That would have been Diana, the office
20 administrator. And she would have taken that information
21 from this form, 61A.

22 Q Okay. And as Counsel for the City pointed out
23 just now, the date on the top of Exhibit 61A, the first
24 page, is April 27th, 2015; right?

25 A Correct.

1 MS. FEOLA-GUERRIERI: Just to clarify the
2 record, I'm the Counsel for the named party
3 defendant Chief Rovella.

4 MS. BAIRD: Okay. Okay. Who was sued in
5 his individual and official capacity --

6 MS. FEOLA-GUERRIERI: That's correct.

7 MS. BAIRD: -- just to clarify the record.

8 BY MS. BAIRD:

9 Q Now, do you know -- and you may not -- whether
10 Ms. Ferraro or anyone from ISS picked up the Citizen
11 Complaint Form, which is contained in Exhibit 61A, when
12 the investigation was assigned?

13 A Absolutely. We pick up -- generally the package
14 is this full information case intake sheet along with the
15 complaint.

16 Q And do you know where the information listed
17 under "Details," No. 6, on Report No. 1 in Plaintiff's
18 Exhibit 61, would have been obtained from?

19 A The intake page of 61A.

20 Q Okay. And that's the first page of Exhibit 61A;
21 correct?

22 A Correct. Where it says "Type of Complaint" and
23 "Allegation."

24 Q Moving on to Report No. 2 in Exhibit 61C. And
25 this is the assigned investigator Kristin Braz --

1 A Brazalovich.

2 Q Brazalovich, that's noted on Report No. 2 that
3 you referenced earlier in your testimony as an
4 investigator with ISS?

5 A Correct.

6 Q And am I correct that Report No. 2 indicates
7 that Ms. Brazalovich was assigned to this investigation?

8 A She was.

9 Q And would you have been the one that assigned
10 her to the investigation?

11 A That's correct.

12 Q Who filled out the information on Report No. 2
13 under 1 through 7 indicating what the complainant states?

14 A That would have been Kristin Brazalovich. It
15 would be her report memorializing her interview with
16 Mr. Peruta. And it goes on to page two where there are
17 11 points.

18 Q Okay.

19 A And then some additional information.

20 Q There is an in-person interview that is
21 indicated was scheduled for 9/22 on the first page of
22 Report No. 2. Do you know if that interview went forward?

23 A Yes, it did. And I believe it ended up being on
24 September 24th, because at this particular point in the
25 investigation I took over.

1 Q Okay. Is it fair to say then that the
2 information in the, as you pointed out, 11 points in
3 Report No. 2 were gathered from documents you had obtained
4 or ISS had obtained in the investigation?

5 MS. FEOLA-GUERRIERI: Objection.

6 MS. HARRIS: Join.

7 THE WITNESS: Sorry.

8 MS. FEOLA-GUERRIERI: Oh, you could still
9 answer if you understand the question.

10 A You're asking about Report No. 2?

11 BY MS. BAIRD:

12 Q Yes.

13 A Well, Kristin Brazalovich would have -- I would
14 have e-mailed her a copy of the complaint. She would
15 have reviewed it and then she would contact the
16 complainant and do the interview. So some of this
17 information may have been gathered from this
18 documentation of the complainant --

19 Q And this documentation that you're pointing
20 out --

21 A I'm sorry. 61A.

22 Q 61A.

23 A Correct.

24 Q Yes.

25 A So in her review she would have reviewed this

1 documentation as it indicates that she was -- yes, that
2 she conducted a complete and thorough review of the
3 documentation and that she could contact the complainant
4 and interview him. And this is, I think, both. This
5 report contains both. That these were statements made to
6 her by the complainant over the phone as well as
7 information she gleaned from this civilian complaint --
8 Citizen Complaint Form.

9 Q Okay. I'm probably missing it and I apologize.
10 Is there a place on Report No. 2 that indicates there was
11 a phone contact?

12 A Yes.

13 Q Okay. Where is that?

14 A Let's see. "The assigned contact" -- this is
15 the second paragraph under "Details." "The assigned
16 contacted the complainant, who was anxious to discuss the
17 matter. An in-person interview was scheduled for 9/22."

18 Q Okay.

19 A But on the phone she said, "The complainant
20 stated as follows."

21 Q Okay. And then moving on to Report No. 3 in
22 Exhibit 61C, your name appears next to "Assigned
23 Investigator."

24 A Correct.

25 Q Was there a reason for the change in

1 investigators?

2 A Yes, there was.

3 Q And what was that reason?

4 A Kristin was not able to meet him at our --
5 Mr. Peruta at our office at the time, so she asked me if
6 I would continue on with the investigation and do the
7 in-person interview, which, of course, I did.

8 Q And was that interview conducted on
9 September 24th?

10 A It would appear so, yes.

11 Q Of 2014.

12 A Yes. Correct.

13 Q Was the interview recorded by audio, by any
14 means of --

15 A No.

16 Q Okay. Did you take notes during the interview?

17 A Generally I do.

18 Q Do you still have those notes?

19 A No. I generally do not keep my notes. It's not
20 our practice. I will review the notes, type my report
21 and then dispose of the notes.

22 Q Had you had contact with Mr. Peruta -- direct,
23 in-person contact with Mr. Peruta prior to September 24th,
24 2014?

25 A Yes.

1 Q On how many occasions?

2 A Just one.

3 Q And what was the nature of that contact?

4 A Well, the nature of the contact was that you and
5 Mr. Peruta came to my office. I believe it was in -- I
6 don't really recall; it might be 2011, 2012 -- to discuss
7 a case that I was working on with a client who needed
8 representation.

9 Q Did you and Mr. Peruta discuss at all when you
10 met on September 24th, 2014, that you had already met?

11 A We did.

12 Q So you both recognized each other.

13 A Yeah, and we had established that over the
14 telephone prior to him coming in.

15 Q How many times did you talk to Mr. Peruta over
16 the telephone about this investigation that you were
17 performing for the Civilian Review Board before he came
18 in?

19 A Well, I'm really not sure. I know that I
20 reached -- I think I reached out to him to advise him
21 that I was going to be conducting the interview, and it
22 appears as though it was originally scheduled for the
23 22nd, but then got moved to the 24th. I'm not sure.
24 Maybe just once on the telephone and then I spoke to him
25 in person when he came in. And then after the

1 investigation was concluded, he called my office.

2 Q Okay. And the information on the first page of
3 Report No. 3 under "Details," is that information taken
4 from your conversation with Mr. Peruta on September 24th?

5 A That's correct.

6 Q About how long did the interview take on the
7 24th?

8 A I really don't recall. But I can't imagine it
9 was more than 35 minutes, 40 minutes.

10 Q Was anybody else present?

11 A No. Just myself and the complainant in the
12 conference room of my office.

13 Q And what documents or records did you have
14 related to the complaint during that interview with
15 Mr. Peruta on the 24th?

16 A He provided me additionally and above and beyond
17 the complaint, which I already had from the city, with a
18 few printed-out cases of case law.

19 Q And is it fair to say that on the second page of
20 Report No. 3 you listed at least some of the cases or all
21 of the cases that he provided?

22 A That's correct.

23 Q Let me see here. This is Exhibit 61G. I'll
24 just ask if you've ever seen any part, all of, or none of
25 that document before?

1 A I really don't recall if I saw -- if he provided
2 me with a copy of this.

3 Q You know, just to be fair, I mean if you look at
4 the second page of Exhibit 61G, it's got an article dated
5 August 11th, 2015 --

6 A I did see that.

7 Q -- and you were long finished your
8 investigation --

9 A Yes.

10 Q -- by August 11th, 2015; right?

11 A Correct.

12 Q So I just want to point that out to you. Let
13 me -- because I know it's a lot of documents to look
14 through. So do you -- without speculating, do you recall
15 Exhibit 61G, any part of it or all of it or none of it?

16 A Well, I'm going to have to look through it,
17 so --

18 Q Okay. Take your time.

19 A I really don't -- I really don't have any
20 recollection of these particular documents in this
21 format. Not to say that the complainant did not give me
22 this. I'm not sure. I would have submitted everything
23 with the City of Hartford with my final report as the
24 documents that were provided to me.

25 I do recall these cases and reading them, but I

1 don't know if the complainant provided me with the case
2 law in this format or if he had given me something else
3 with respect to the synopsis of the case law that he felt
4 supported his claim.

5 Q Okay.

6 A So I'm just not sure in this context, but it's
7 possible.

8 Q Okay. Thank you.
9 I'll take that away from you.

10 A Sure. Thanks.

11 Q Because I don't think we'll be referring to it.

12 MS. FEOLA-GUERRIERI: You know what? Just
13 to clarify, on page two of her report she
14 actually says that "he provided the following
15 cases" --

16 THE WITNESS: Right.

17 MS. FEOLA-GUERRIERI: -- "to support."
18 And they are all listed, so --

19 MS. BAIRD: I don't know -- yeah.

20 MS. FEOLA-GUERRIERI: I don't know if they
21 are in here. They could be in here.

22 A Yeah. I know that sometimes that they -- you
23 know, that cases are summarized in different manners and
24 capacities, and that looks like it's a complaint in this
25 case. And I'm not sure if he provided me with the actual

1 complaint to cite the case law or if it was -- to my
2 recollection I'm recalling something that was a summary
3 of case law.

4 BY MS. BAIRD:

5 Q Right.

6 A But I can't say for sure that it was in that
7 document format. But I did cite the cases. I do
8 remember reading those cases in whatever context he
9 provided them to me. The synopsis of the case law.

10 And I do -- is it all right if I please take a
11 break?

12 MS. BAIRD: Oh, yes. Of course.

13

14 [Off record: 10:48 a.m. to 10:57 a.m.]

15

16 BY MS. BAIRD:

17 Q So going back to Exhibit 61C, the first page,
18 under No. 10, "Details."

19 A Yeah.

20 Q This was an intake form; am I correct?

21 A Correct.

22 Q But it lists -- it says, "List of all witnesses
23 interviewed with addresses and phone numbers." If I could
24 just ask, what witnesses could have been interviewed prior
25 to you even getting the case --

1 MS. FEOLA-GUERRIERI: Objection.

2 BY MS. BAIRD:

3 Q -- at the time of intake?

4 A Well, typically this particular line 10 is for
5 any witnesses that the complainant identifies that will
6 support his or her case.

7 Q Oh, okay.

8 A And then here it said not applicable because
9 Mr. Peruta did not list any witnesses.

10 Q I got it.

11 On Report No. 3 on the first page of Exhibit --
12 Exhibit 61C, Report No. 3, the first page of that report.

13 A Yes.

14 Q The last paragraph indicates that the complaint
15 said that the officer in charge in the video had a white
16 T-shirt with a badge around his neck. Is that information
17 that was provided to you during the interview?

18 A Yes. And it should say "the complainant said,"
19 not "the complaint said."

20 Q Okay.

21 A That's always a tricky word, especially with
22 auto-correct.

23 Q And you had mentioned that Diane Ferraro is no
24 longer with your office?

25 A Correct, yeah.

1 Q And you seemed to indicate there was a reason
2 for that. What is the reason for that?

3 A She just -- you know, she was an administrative
4 assistant and I just didn't feel supported by her in
5 general.

6 Q And when did she leave?

7 A Oh, she left in 2015. Yeah.

8 Q Did you ever identify the officer in charge, in
9 the video as described by the complainant, who was wearing
10 a white T-shirt with a badge?

11 A I did not. And I had sent e-mails, which are in
12 the back of 61C here, to Anlinda Thomas requesting that
13 information. But at the time she apparently did not have
14 the information to provide because there were multiple --
15 as she says, there were "unknown officer, multiple patrol
16 units responded to the call, a shooting incident and the
17 involved officer's were not identified by name by the
18 complainant," is what Ms. Thomas wrote to me.

19 I'm sorry, her name is also Knight -- Anlinda
20 Knight Thomas. The e-mail is from Anlinda Knight, but
21 she had gotten married and so I refer to her as Anlinda
22 Thomas, just to clarify.

23 Q Do you know what position Ms. Thomas held when
24 you were -- when you were in contact with her by e-mail as
25 indicated in the last two pages of Exhibit 61C?

1 A I'm not sure what her exact job title is with
2 Internal Affairs, but when I came to Integrated in -- ISS
3 in 2009, she was the contact person to get any type of
4 reports, any type of information that we needed
5 pertaining to our investigation. If there wasn't a
6 police report attached that we wanted to see, she would
7 provide it to us and answer -- you know, give us
8 information that we were looking for.

9 Q And what information, if any, did Ms. Knight
10 provide regarding this investigation of Mr. Peruta's
11 complaint in 2014?

12 A I don't think she provided anything. I asked
13 her to identify the officer and she couldn't.

14 Q Report No. 4 in Exhibit 61C lists the assigned
15 investigator as Kristin Brazalovich. Is it fair to say
16 that she was still involved in the investigation?

17 A No. No. It's not.

18 Q Okay.

19 A And we -- right. So let's see --

20 Q Well, I'll ask the question.

21 A Sure.

22 Q In that Report No. 4 there is information listed
23 under "Details." Who put that information in to Report
24 No. 4?

25 A I did.

1 Q And who performed the activity described under
2 "Details" in Report No. 4?

3 A I did.

4 Q So do you know why Ms. Brazalovich's name is on
5 Report No. 4?

6 A I do. Because when we put in the assigned
7 investigator's name -- so, for instance, in Report 1 it
8 was Ms. Ferraro did the intake. Then we changed it to
9 Kristin doing the interview. And then I changed it to my
10 name, although I don't know why it would have defaulted
11 back to her name. That might -- I don't know, that might
12 have just been an error.

13 Q Okay. Now, you indicate in Report No. 4 that
14 you conducted legal research; is that correct?

15 A Correct.

16 Q And was this part of your investigation for the
17 Civilian Review Board to conduct legal research?

18 A Yes. When -- when it's appropriate.

19 Q Okay. And so you've done that in other cases as
20 well, not just in Mr. Peruta's case?

21 A Yes, in -- just various types of legal research
22 if -- you know, researching the laws or even the
23 ordinances as they relate to any case.

24 Q Did you look at any policies or procedures of
25 the Hartford Police Department?

1 A With respect to this case?

2 Q With respect to Mr. Peruta's case, yes.

3 A If it doesn't say that I did, I probably did
4 not.

5 Q Let me pull out Exhibit 27 here which is a media
6 policy.

7 I'm showing you what's been marked as
8 Exhibit 27. Have seen that policy before?

9 A I don't believe so.

10 MS. FEOLA-GUERRIERI: Are you asking her in
11 relation to this investigation?

12 MS. BAIRD: I'm just asking before today.

13 A In general no, because I don't think I've ever
14 had another case, outside of Mr. Peruta's, where the
15 media was challenging anything. So I don't -- I don't
16 think that I've ever seen this before.

17 BY MS. BAIRD:

18 Q Okay. And so I'll just ask the next follow-up
19 question. With regard to Mr. Peruta's case, did you
20 review Exhibit 27, the Media Policy?

21 A No.

22 Q Do you know if you reviewed any policy of the
23 Hartford Police Department with regard to Mr. Peruta's
24 case?

25 A I don't believe that I did if it doesn't say

1 that I did, because his complaint was, from my perception
2 and my discussion with him, the straight-up First
3 Amendment violation. And so he -- I don't think he was
4 really claiming any policies or procedures had been
5 violated, other than just his First Amendment claim. So
6 it didn't -- yeah -- so no, I don't think that I did.

7 Q Okay. Now, in Report No. 4 did you, in your
8 investigation, draw any conclusions about whether the
9 officer -- officers wanted Mr. Peruta to film the dead
10 body in the street?

11 MS. HARRIS: Objection.

12 MS. FEOLA-GUERRIERI: Objection to form.

13 MS. HARRIS: You can answer.

14 A In Report 4?

15 BY MS. BAIRD:

16 Q Yes.

17 A I'll have to read it.

18 Yes.

19 Q And what was your conclusion?

20 A I obtained this conclusion by reviewing the
21 YouTube video, and so I note that at one point the police
22 officer is heard saying "you're not filming a dead body."
23 And it is clear on the YouTube video which the
24 complainant edited to add the words this is the "real
25 reason" that he was told to stop filming.

1 Q Okay. And --

2 A "Indeed" --

3 Q Did you accept -- I mean is that what your -- is
4 that how you drew your conclusion, based on what the
5 complainant edited to the YouTube video?

6 A No. It was in my conversation with him too.
7 I'm not sure -- so he's saying that the reason that he
8 was told to stop filming was because the officer said,
9 "you're not filming a dead body."

10 He sent this to me and then he also had edited
11 that into the video at the end. I recall the video, and
12 in the end it said, you know -- I don't remember exactly
13 what it said, but it's in there. And he put text to the
14 end of the video where he was blocked out and filming
15 from a distance, I guess, and said this is the real
16 reason that Hartford police told him to stop filming.
17 They didn't want him filming a dead body.

18 Q Okay. And did you accept the complainant's
19 position as stated in those words on the YouTube video?

20 MS. FEOLA-GUERRIERI: Objection to the
21 form.

22 MS. HARRIS: Objection.

23 A Yeah, I'm just not sure what you mean did I
24 accept it.

25

1 BY MS. BAIRD:

2 Q Well, I'm just trying to gather whether that was
3 your conclusion or whether you're saying that was the
4 complainant's conclusion.

5 A Yes. I watched the video which he provided to
6 me, and I can see what I noted here, I saw -- I observed
7 this, which is all observable in the video; that the
8 officer is telling him he's not going to film a dead
9 body. And then in the end of that video there is text
10 that the complainant put in there basically saying that
11 this is the real reason that Hartford police told him to
12 stop filming.

13 Q And did you in the -- I mean you're a fact
14 finder as an investigator; correct?

15 A Correct.

16 Q And did you -- did you make any determination or
17 findings of facts about whether Mr. Peruta's position that
18 that was the officer's intention, to block the filming of
19 a dead body?

20 MS. HARRIS: Objection.

21 MS. FEOLA-GUERRIERI: Objection to form.

22 A Yes, because that's what he said. That's -- he
23 was being prevented from filming the crime scene, and the
24 reason was because he was filming the dead body. And the
25 officer is seen in the video telling him he's not filming

1 a dead body. And then in the end, you know, the
2 complainant put his own text into the video basically
3 saying that he was not allowed to film a dead body.

4 BY MS. BAIRD:

5 Q Now, in the video did you observe an officer
6 make any statement about a dead body?

7 A Yeah, I believe so. I believe he said, "you're
8 not filming a dead body." But it's been a while since I
9 saw the video --

10 Q Yeah, we'll get to that.

11 A But it says in my report that that's what I
12 observed in the video, so ...

13 Q And were you ever able to identify the officer
14 in the video who made a statement about a dead body?

15 A No. No. It's in the video, to my recollection,
16 who I now know to be Sergeant Spell, but did not know
17 that at the time -- former Officer Spell -- that he was
18 directing an officer to tell the complainant to stop
19 filming.

20 Q And in Report No. 4, you reference in the
21 paragraph second from the bottom, in the first line,
22 "officers." Do you see that?

23 A I'm sorry. Second from the bottom?

24 Q Yes. The second paragraph from the bottom of
25 Report 4.

1 A "Indeed, it does seem as though the officers did
2 not want the complainant filming the dead body lying in
3 the street."

4 Q And do you recall if you observed in the video
5 any officer, other than who you now know to be Sergeant
6 Spell, indicating or acting as if they didn't want the
7 complainant to film a dead body?

8 A Yes. As I said, Sergeant Spell can be seen in
9 the video telling an officer to tell the complainant to
10 stop filming. And then that officer --

11 MS. HARRIS: I'm going to -- well, go
12 ahead.

13 A That's my recollection.

14 BY MS. BAIRD:

15 Q And who -- were you able to identify the officer
16 that Sergeant Spell -- who you now know to be Sergeant
17 Spell -- was indicating --

18 A No.

19 Q -- to?

20 A No.

21 Q Going on in Plaintiff's Exhibit 61C, the Report
22 No. 5. And the assigned investigator listed on Report
23 No. 5, that's you, right --

24 A That's correct.

25 Q -- Jacqueline Manning?

1 Is this the last report that you did regarding
2 Mr. Peruta's complaint?

3 A Yes. This is the final report. The
4 investigation summary.

5 Q If I could just, while you're keeping that
6 Report No. 5 open, ask you to go back to Exhibit 61A, the
7 complaint that Mr. Peruta filed. Under "Description of
8 the Incident" in his complaint, which is the fifth page of
9 his Citizen Complaint --

10 A Well, these aren't numbered. Are you referring
11 to --

12 Q Yes. Just go five pages in of his Citizen
13 Complaint.

14 A (Indicating.)

15 Q One more. And does it have "Description of the
16 Incident" at the top?

17 A Yeah.

18 Q And if I could -- if I -- in accepting or taking
19 in the investigation, did ISS rely on the charges filed by
20 Mr. Peruta in his Citizen Complaint of "conduct unbecoming
21 an officer," "harassment," "threatening," and "civil
22 rights violation" in listing what his complaints were in
23 Report No. 5? Because they seem to be different.

24 MS. FEOLA-GUERRIERI: Objection.

25 A "Threatening arrest of complainant" is not an

1 actual terminology used by the -- on the civilian
2 complaint review board.

3 BY MS. BAIRD:

4 Q Okay.

5 A So I think when we took the case in -- sorry,
6 let me just go back. Yeah, the complaint was listed --
7 we relied on the complaints that were outlined in the
8 civilian -- in the intake sheet.

9 Q Okay. And that's the first page of Exhibit 61A?

10 A Yes.

11 Q And those match up; correct?

12 A Correct. The one that does not match up with
13 the complainant's was "threatening arrest of the
14 complainant." And it seems as though it was marked off
15 as a "discourteous attitude" because there is not
16 "threatening arrest of a complainant." That's a box to
17 check off in the complaint form.

18 Q Okay. Thank you.

19 In Report No. 5 you mentioned your experience as
20 a former journalist. You mentioned --

21 A Yes.

22 Q -- you were a former journalist.

23 A Right.

24 Q We didn't talk about what you did before 2009,
25 so let's do that now.

1 A Sure.

2 Q What jobs have you held or what experience do
3 you have as a journalist?

4 A I worked as a contributing writer for the
5 *Southington Observer* for a number of years, and I also
6 worked as full-time for the *Bristol Press* as a staff
7 reporter.

8 Q When did you work for the *Bristol Press* --

9 A 2007.

10 Q -- as a staff reporter?

11 A Sorry. 2007.

12 Q And did you say *Southington*?

13 A *Observer*.

14 Q *Southington Observer*. When did you work for the
15 *Southington Observer*?

16 A I worked for them for -- I think it was in 2002
17 through 2004. It's been a long life, so don't hold me to
18 that. But it was probably about two years as
19 contributing writer covering various different --
20 specifically the Board of Education, Planning and Zoning,
21 you know, board meetings and issues.

22 Q And what kind of issues did you cover during
23 your time at the *Bristol Press*?

24 A I was assigned to cover the Town of Plymouth,
25 and I uncovered a whole host of issues that were going on

1 at the time regarding the then Mayor, Jan Krampitz.

2 COURT REPORTER: Did you say you covered or
3 uncovered?

4 THE WITNESS: Covered and uncovered.

5 BY MS. BAIRD:

6 Q What education beyond high school do you have?

7 A I went to the Connecticut School of
8 Broadcasting. That's my post-high school. That was my
9 post-high school training, and I wanted to be a broadcast
10 journalist.

11 Q And what was your first job after your
12 graduation from the Connecticut School of Broadcasting?

13 A Oh, I waitressed for a number of years, and
14 wrote. I wrote a lot of creative writing. And so I
15 really was a single mother, so I was raising my child and
16 waitressing to make ends meet. But I was learning and
17 studying all different kinds of things at the time
18 because I'm very curious and I'm always learning.

19 Q When did you graduate from the Connecticut
20 School of Broadcasting?

21 A I think it was 1994. Yeah, '94.

22 Q And what did you do after the job at the *Bristol*
23 *Press*?

24 A I went to work for J&G Investigations.

25 Q Where are they located?

1 A Columbia.

2 Q Okay.

3 A Not the country. Connecticut.

4 Q And were you at J&G until 2009 when --

5 A Correct.

6 Q -- you joined ISS?

7 A That's correct.

8 Q And between 2004 and 2007 were you employed?

9 A I actually took a sabbatical for a little while,
10 but yes, I'm sure that I had some, you know, jobs to make
11 ends meet. I was really trying to develop as a writer.

12 Q Did you -- let me strike that. Let me ask this.

13 I'm looking at Report No. 5, and you had
14 indicated under the "Details" in Report No. 5 that the
15 matter was concerning for several reasons. And when you
16 say "concerning," do you mean concerning to you?

17 A Yes, I did.

18 Q And what were the several reasons? I know you
19 list one, but what were the several?

20 A Well, as I mentioned, I am a journalist -- you
21 know, former journalist, but I always have the heart of a
22 journalist. And the most -- the most concerning thing
23 about the incident was that this was a homicide
24 investigation that was very fresh. It had just been --
25 it just happened. And as a criminal defense investigator

1 too, which is a lot of what I do, you know, it's
2 imperative that details of homicide investigations stay
3 confidential until the case is adjudicated.

4 So the fact that the main evidence in this case,
5 which is the dead body, the clothes the victim was
6 wearing and other details about the crime scene could get
7 out and be public, that was concerning to me as a
8 criminal defense investigator. That the public now had
9 knowledge of the crime scene because it's on YouTube.

10 And, you know, just to elaborate a little more,
11 as a criminal defense investigator there's often times
12 where jailhouse snitches and, you know, people come
13 forward and they have details, and they convict people
14 on, you know, basically their testimony. And if details
15 of a crime scene investigation, particularly a homicide
16 investigation, get out into public forum, that's
17 dangerous and anyone could then have details that were
18 confidential and their testimony could be used to convict
19 somebody. That was the main concern that I had.

20 Q Okay. And you indicate in Report No. 5 that one
21 of your concerns was based on the fact that the officers
22 ordered Mr. Peruta to stop filming. Is that true?

23 A That's true.

24 Q So do you think your experience or your work as
25 an investigator in criminal matters impacted your concerns

1 in this case?

2 A Sure.

3 Q And when you worked at the *Bristol Press* or the
4 *Southington Observer*, did you follow any policies or
5 procedures about not filming crime scenes or dead bodies?

6 A No, because that wasn't really my beat. I
7 didn't go to homicide scenes during the course of my
8 duties.

9 Q Do you know if there were other individuals at
10 the fresh homicide scene on Park Street who had cameras or
11 cell phones that were able to take video?

12 A I'm not sure.

13 Q Did you go to the location of the scene, the
14 homicide scene from September 12th, 2014?

15 A No.

16 Q Are you familiar with the intersection of Park
17 and Hungerford Streets in Hartford --

18 A Yes, because my office is around the corner.

19 MS. FEOLA-GUERRIERI: Can I take a quick
20 break when you get a chance?

21 MS. BAIRD: That's fine.

22

23 [Off record: 11:25 a.m. to 11:28 a.m.]

24

25 MS. BAIRD: Okay. Back on the record?

1 MS. FEOLA-GUERRIERI: Yes. Thank you.

2 BY MS. BAIRD:

3 Q Report No. 5 that we were looking at in
4 Exhibit 61C, the second page -- well, the first and second
5 page, under "Findings." You wrote that; correct?

6 A Correct.

7 Q Fair to say that you made some legal conclusions
8 in there about the scope of the First Amendment?

9 A Yes, to the best of my ability. I did not think
10 that the case law that Mr. Peruta presented was parallel
11 to his complaint. I didn't find it to be supportive of
12 his particular circumstances. And I'm not a lawyer and
13 neither is he, but, you know, we do the best that we can.

14 Q Sure. And then on the third page of Report
15 No. 5, under "Disposition."

16 A Yeah.

17 Q You list the officer as "unknown"; right?

18 A Correct.

19 Q Now, was it your understanding that Mr. Peruta
20 was making a complaint about one officer or more than one
21 officer?

22 A His general complaint seemed to be about the
23 detective, who I now know to be Sean Spell. And he said
24 that -- as a matter of fact, I recall now that he said he
25 didn't blame the other officer who was telling him to

1 stop filming, because he was just doing his duty under,
2 you know, the officer in charge, who was Mr. Spell.

3 Q Okay. And then again on page three of Report
4 No. 5, you list four areas regarding the complaint:
5 Discourteous Attitude, Conduct Becoming -- Unbecoming an
6 Officer --

7 A Yeah.

8 Q -- Harassment, and Civil Rights Violation;
9 correct?

10 A Correct.

11 Q And for each of those you find "not sustained."

12 A That's correct.

13 Q What are the different options you have in terms
14 of findings after an investigation?

15 A So we can sustain a complaint, which is
16 basically that we feel the evidence supports the
17 complainant's concerns. And each particular charge, we
18 can sustain one and not sustain another as long as we
19 believe -- you know, if we see that there's enough
20 evidence to draw that conclusion, then we can sustain a
21 complaint.

22 "Not sustained" means that we don't have enough
23 information or there isn't just enough evidence one way
24 or the other to sustain the complaint.

25 We can exonerate the officer. We can find that

1 the officer's actions were completely appropriate and
2 that the -- and that they followed policy and
3 procedure -- whatever the complaint is, that they
4 followed the law and that there was no violation, so we
5 can completely exonerate them.

6 We can --

7 Q So far you've listed three; right?

8 A Yeah, there's -- I think there's five.

9 Oh, "unfounded," which means there's no basis
10 for the complaint whatsoever.

11 Q Okay. And if you think of any others just let
12 us know.

13 A I think there's one more. I'm just --

14 Q Where do you get your direction from or
15 knowledge about the different categories of findings? And
16 you've just listed four. Are those in some policy,
17 procedure --

18 A Yes. Yes.

19 Q -- where are they?

20 A They were provided to me by the city a while
21 ago.

22 Oh, I know what the other -- it's "withdrawn" is
23 the other conclusion. If the complainant withdraws their
24 complaint. And so those are the dispositions that were
25 provided to me by the City of Hartford. I do have those

1 in a -- I believe in an e-mail, although I know I did
2 lose my e-mails, so I'm not sure if I still have those.
3 But we're pretty familiar with them.

4 Q Now, the date of the report, your final report,
5 Investigative Summary, Report No. 5, is dated
6 October 20th, 2014?

7 A Yes.

8 Q Is it fair to say that's when you actually wrote
9 the report?

10 A Prob -- yeah, the final version of it. I might
11 have started it. I generally will jot down my thoughts
12 and, you know -- into the synopsis and then I'll add to
13 it. But it's possible -- oh, this is -- yes. Yes.

14 Q Do you know if -- and I'm referring to the last
15 two pages, the e-mails of Exhibit 61C now. Do you know if
16 you were done writing Report No. 5 on October 21st when
17 these e-mails were sent -- or when the e-mail was sent to
18 Ms. Knight?

19 A Yes. Probably what happened was I realized the
20 officer had not been identified when I was writing the
21 final report. So I wrote the final report probably on
22 the 20th, realized that, sent her correspondence asking
23 her to -- for me to fill in that last portion, which was
24 the officer. And then I could not do that, so I just
25 didn't change the date of the report because I probably

1 wrote it on the 20th, realized that she -- that the
2 officer had not been identified, e-mailed Anlinda asking
3 her for that last piece of information, which she didn't
4 have.

5 Q And in your e-mail to Ms. Knight in Exhibit 61C
6 that was sent on October 21st, you ask Ms. Knight to
7 identify the officers who were the subject of the
8 complaint; correct?

9 A Correct.

10 Q And Ms. Knight, do you recall receiving an
11 e-mail from her saying "unknown officer"?

12 A Yeah. I don't recall it, but I do see that I
13 did.

14 Q And then if you look at the last page of
15 Exhibit 61C where it has an e-mail dated October 21st, at
16 2:15 and 33 seconds p.m. --

17 A Yeah.

18 Q -- it appears that Ms. Knight provided more
19 detail than the e-mail that was sent on October 21st at
20 2:12:37.

21 A Yes. It appears that she sent me an e-mail
22 saying "unknown officer," and then followed it up a
23 couple minutes later with an e-mail saying, "unknown
24 officer, multiple patrol units responded to the call, a
25 shooting incident." And the involved officers who were

1 not identified by name by the complainant.

2 Q Did you access or request access to any Hartford
3 Police Department reports or records regarding this
4 incident?

5 A Absolutely not. It's a homicide investigation.
6 They were not going to give that to me.

7 Q So it's your experience that in a homicide
8 investigation that's active, that the Hartford Police
9 Department does not provide ISS records related to the
10 investigation?

11 A If it's ongoing, yes. I have been denied
12 records for ongoing cases that were obviously still under
13 investigation. But anything that's been adjudicated,
14 I've always been given those documents. I --

15 Q I'm sorry.

16 A I also have been given documents that were
17 related to ongoing matters specifically if the
18 complainant is being charged with something. Then we
19 will have that report to determine what happened. So
20 it's not all cases of ongoing investigation. But I do --
21 this was a homicide investigation, and I didn't even
22 attempt to do it because there's really no reason to do
23 that. Mr. Peruta was not arrested and there was nothing
24 pertaining to him or the officers' interactions with him,
25 I'm sure, in the police file. It was a homicide

1 investigation.

2 Q Well, do you agree that in the police file there
3 might have been information about officers who were at the
4 scene?

5 A That's -- yes.

6 Q And that knowing officers at the scene may have
7 assisted in determining the identity of the individual
8 referenced as an "unknown officer" in the e-mails?

9 A True. Yes. But I asked directly for that
10 information so that -- because I wasn't going to ask for
11 the police file of a murder -- murder case that was
12 ongoing.

13 Q And did you have any conversations with
14 Ms. Knight, outside of the e-mails that we have in Exhibit
15 61C, about her attempts to identify the unknown officer?

16 A No. I've only spoken to Anlinda Thomas over the
17 phone maybe twice in the whole time I've been there.
18 Everything's done by e-mail.

19 Q Is there a specific period of time when ISS --
20 I'll ask with regard to Mr. Peruta's case. Was there a
21 specific period of time when ISS was expected to complete
22 its investigation after the initial intake?

23 A Generally we're assigned 30 days. However, I've
24 never been denied a -- and granted an extension when I've
25 asked for it if I felt that I needed more time to speak

1 to a witness or gather more information. I've routinely
2 asked for extensions, so -- but typically we're assigned
3 30 days to investigate the case and we can ask for more
4 time if we need it.

5 Q Did you consider contacting someone in the
6 Internal Affairs department at the Hartford Police
7 Department and showing them the officer portrayed in the
8 video who had mentioned or referenced a dead body to get
9 his identification?

10 A No. I didn't consider that.

11 Q Okay. Why not?

12 A Because I just didn't think of it. I --
13 generally when I don't know who an officer is being
14 accused, I e-mail and generally I get an identity. This
15 is one of the few cases that I wasn't -- I didn't get an
16 identity.

17 Q But you did have a video picture of the
18 individual.

19 A I did. I did not think to send that.

20 Q Let me grab another exhibit here.

21 This is Exhibit 61D. It's a one-page letter.

22 Just ask if you've seen that before?

23 A It's possible.

24 Q But if you don't recall, you don't recall.

25 A Yeah, I don't recall.

1 Q Okay. Do you know a person who works for the
2 City of Hartford by the name of Kimberly Taylor?

3 A Yes.

4 Q And how long have you known her?

5 A Since I took over the office in 2009.

6 Q And do you know her through your work on behalf
7 of the Civilian Review Board?

8 A She's my main primary contact at the City of
9 Hartford Corporation Counsel. At the time, though, it
10 was the Office of Human Relations.

11 Q In 2009 when you began work with ISS, Ms. Taylor
12 was assigned or worked for --

13 A The Office of Human Relations.

14 Q And do you know when that changed to the Office
15 of Corporation Counsel?

16 A A few years in. I'm not sure of the date.

17 Q So if I could direct your attention to the first
18 page of 61A, if you still have it in front of you.

19 A I do.

20 Q On Exhibit 61A, the first page, where it says
21 "Referral Agency: Office of Human Relations," do you know
22 if in 2014 Ms. Taylor was still in the Office of Human
23 Relations?

24 A I know she's always handled assigning us these
25 matters. We get notification from her that we have cases

1 to be picked up. Whether or not it was actually the
2 Office of Human Relations or Corporation Counsel at that
3 time, I don't know. It says the Office of Human
4 Relations, so I'm going to -- I don't know about their
5 internal -- when that transitioned over. I'm not sure.

6 Q And in all five reports in Exhibit 61C, they --
7 there is an addressee listed as Sandra Kee --

8 A Borges.

9 Q -- Borges. Do you know who that is?

10 A She is the former Corporation Counsel?

11 Q Have you ever met Ms. Borges personally?

12 A No.

13 Q Did you communicate with Ms. Borges concerning
14 Mr. Peruta's complaint?

15 A I don't think so. I don't think I ever
16 communicated directly -- I might have once or twice, but
17 not on this matter, I don't think.

18 Q Other than Ms. Taylor, since your employment
19 with ISS since 2009 has anyone else in the City of
20 Hartford served as a contact point regarding your
21 investigations for the Civilian Review Board?

22 A I'm sorry. I misunderstood. So -- I'm not sure
23 I understand.

24 Q No. That's good.

25 A So you're saying that in the time that I started

1 from Integrated in 2009 until I ended, was there ever
2 anyone else at the City of Hartford that was a contact
3 person for us regarding these cases --

4 Q Yes.

5 A -- other than Kimberly Taylor?

6 Q Yes.

7 A No. Never.

8 Q Exhibit 61D -- I'm sorry, 61E and F. I'll hand
9 them both to you at the same time.

10 61E contains the name of Alan Schissel.

11 A Yeah. Schissel.

12 Q Schissel. And he is the principle or the owner
13 of ISS?

14 A Correct.

15 Q What is H.P. Investigations, if you know, that's
16 listed at the top of Exhibit 61E?

17 A It's a division of Integrated Security.

18 Q And are you employed by that division of
19 Integrated Security?

20 A Yes, my -- but my paychecks come directly from
21 Integrated Security. I'm not really sure of the
22 corporate structure related to that.

23 Q Okay. Do you know what "H.P." stands for?

24 A Do I have to answer that question? "Hot
25 Pursuit."

1 Q Oh, okay.

2 A It's just a -- just a little joke.

3 Q Going on to Exhibit 61F. This is a -- are you
4 familiar -- have you seen this document before, this
5 three-page document, 61F?

6 A Well, I haven't seen the first page, but the
7 second pages are -- is our invoice.

8 Q Okay. So the second and third page of 61F, have
9 you seen those pages?

10 A Second and third page, yes.

11 Q And sitting here today, to the best of your
12 knowledge, are the details of the professional services
13 rendered and the time, hours, and charges accurate?

14 A Yes.

15 Q Other than the work indicated on the second and
16 third page of Exhibit 61F, was there -- or were there any
17 other services provided or work performed in this file
18 No. 2014-1475?

19 A No.

20 Q This is Exhibit 61B. Take a moment to look
21 through the five pages in Exhibit 61B and, when you've had
22 ample opportunity to do that, indicate if you recognize or
23 have seen any of the pages contained in 61B previous to
24 today.

25 A This is an Internal Affairs report, so I would

1 not have -- I've never seen this with respect to -- I
2 don't get copies of these.

3 Q Okay. So the first page of Exhibit 61B, which
4 has a date of March 26th, 2015, on it, that's not a
5 document you've seen before?

6 A No.

7 Q And then there's a three-page memorandum that
8 follows in 61B, dated March 26th, 2015. You've never seen
9 that document before today?

10 A No.

11 Q Do you know who Lieutenant O'Brien is, who is
12 listed on the first page of that March 26th memorandum?

13 A No.

14 Q Do you know who Deputy Chief Foley is?

15 A I know of him, but I've never met him or spoken
16 to him.

17 Q And then I'll just ask, the last page of
18 Exhibit 61B, have you seen that before?

19 A No.

20 Q What, if you know, is the information available
21 to ISS from the Hartford Police Department related to
22 investigations you perform? What information can you
23 access from the Hartford Police Department related to
24 investigations you do for the Civilian Review Board?

25 MS. FEOLA-GUERRIERI: Objection to the form

1 of the question.

2 MS. HARRIS: Join.

3 A Do I answer anyway?

4 BY MS. BAIRD:

5 Q If you understand.

6 MS. FEOLA-GUERRIERI: If you can respond to
7 that question in every case.

8 A I can't in every case, but generally speaking I
9 ask for whatever I feel I need for the investigation. So
10 if there's some video footage that might have been taken
11 from a gas station and seized by the police in the
12 arrest, I will ask for that. If there's a police report
13 in association -- well, I can ask directly for anything I
14 need from any outside party, so we've seized, you know,
15 and asked for footage before -- not seized, but requested
16 footage from outside parties. But I've asked for, you
17 know, police reports associated with the arrests. I've
18 asked for and received CADD reports, 9-1-1 calls, you
19 know, recordings.

20 Generally anything that I need specifically I
21 can have. I know what I cannot have is I cannot
22 interview the officers because they are represented by
23 union representatives. So we definitely have never had
24 access to officers. But other than that, it's really on
25 a case-by-case basis. Whatever it is that I deem I need,

1 I request.

2 BY MS. BAIRD:

3 Q Is information related to an ongoing homicide
4 investigation, such as you indicated was the case in
5 Mr. Peruta's complaint, is that off limits?

6 A Well, just as a person I know it's off limits.
7 I didn't ask for it because I didn't determine that it
8 would have anything to do with what Mr. Peruta was
9 complaining about, so I did not ask for it. But I
10 wouldn't ask for it. It's a homicide investigation. I
11 just know better. Like, I'm not going to -- and plus,
12 there was nothing in there that would even be relevant,
13 so there's no reason to ask for any documentation related
14 to that homicide.

15 Now, if he had been arrested for interfering, I
16 would have asked for that report. But he wasn't.

17 Q But you did ask in the e-mail for the identity
18 of the officer.

19 A Yes. Because we're asked to identify the
20 officers.

21 Q Other than Ms. Knight, in the course of your
22 investigations for ISS since 2009, have you spoken to
23 anyone at the Hartford Police Department assigned to the
24 Internal Affairs department?

25 A Yes. I communicated on a couple of -- when I

1 first started, there was Lieutenant Brooks. So I had
2 asked Lieutenant Brooks for some information that Anlinda
3 I think was not prepared to give to me. She needed to
4 push it past him. So I did meet Neville Brooks once and
5 talked to him and communicated with him via an e-mail a
6 few times. And then Lieutenant Davis, Robert Davis, I
7 communicated with him by e-mail a few times.

8 There were points where Anlinda was just not
9 around, so the contact person for Internal Affairs would
10 change. Lieutenant Coates, I've communicated with him.
11 And then with respect to my requests I've also
12 communicated through the F.O.I. Division with Ursula
13 Wiebusch looking for information. Then there's someone
14 who is in charge of the Division of Emergency
15 Communications, which is the 9-1-1 calls. I can't
16 remember what his name is. But I've e-mailed and
17 requested, you know, 9-1-1, you know, recordings from him
18 directly. But I think that would probably be the extent
19 of the people that I've communicated with in Internal
20 Affairs.

21 Q I'm going to -- well, let me put it this way.
22 When you were investigating Mr. Peruta's complaint, did
23 you gain access to a CD or DVD with information on it?

24 A Yes.

25 Q And just best recall, what information did it

1 have on it?

2 A It was a video recording of the actual incident
3 that he had with police. And he provided that to me.

4 Q Okay.

5 A At the time that I interviewed him on
6 September 24th.

7 Q Okay. And if I could have a moment to see if I
8 can get that to play, this would be Exhibit 61I -- 61H
9 from yesterday. Okay?

10 MS. FEOLA-GUERRIERI: Do you know how long
11 that is?

12 MS. BAIRD: I do not.

13 THE WITNESS: I think it's like two, two or
14 three minutes. Maybe five minutes tops.

15 MS. FEOLA-GUERRIERI: So there's more than
16 just the video on there. The cases --

17 MS. BAIRD: For the record, there was a
18 file folder that was brought yesterday by the
19 deponent, Kim Taylor, Kimberly Taylor, and we
20 marked the file folder as Exhibit 61. And
21 attached to that file folder was a CD -- or DVD
22 that we marked as 61H. If that's correct, 61H?
23 Yes.

24 My office copied the contents of 61H onto a
25 hard drive and we, for today's purposes, copied

1 the contents of 61H back to a CD or DVD to show
2 to this deponent, Jacqueline --

3 THE WITNESS: Bainer.

4 MS. BAIRD: Bainer. We also made a copy
5 for Counsel, and perhaps we should just enter
6 this as a new exhibit to make sure it matches
7 the 61H that was brought yesterday. But --

8 MS. FEOLA-GUERRIERI: Right. 61H is
9 already marked.

10 MS. BAIRD: Yes.

11 MS. FEOLA-GUERRIERI: And you're saying
12 that that is just a copy of it.

13 MS. BAIRD: A copy of it. Right.

14 MS. FEOLA-GUERRIERI: Okay.

15 BY MS. BAIRD:

16 Q So Ms. Manning, what -- Ms. Bainer, what I'm
17 going to do is go through the contents of Exhibit 61 --

18 A H.

19 Q -- H and ask you if you recognize the documents
20 or folders or media on 61H.

21 [Playing Exhibit 61H.]

22 BY MS. BAIRD:

23 Q And if you need to get closer -- I know it's
24 kind of hard to see from where you are, but do you
25 recognize this document that appears to be eight pages

1 with some highlighting in it?

2 MS. FEOLA-GUERRIERI: Can you blow it up a
3 little?

4 MS. BAIRD: Okay. Let me see. There we
5 go.

6 A Yes, this is one of the cases that the
7 complainant cited as evidence in his case.

8 BY MS. BAIRD:

9 Q Okay.

10 A Supporting cases that ...

11 Q Okay.

12 [Playing Video 61H.]

13 BY MS. BAIRD:

14 Q And moving onward to another document contained
15 on 61H, do you recognize this document?

16 A I don't recognize it, you know, but I recognize
17 the case name, so ...

18 Q Okay.

19 A As being another case that was cited by the
20 complainant.

21 [Playing Exhibit 61H.]

22 BY MS. BAIRD:

23 Q Do you recognize this document as one being
24 provided to you by the complainant, Mr. Peruta?

25 A I don't recognize it. It's possible that I

1 recognize that document because you showed it to me in
2 the -- you showed it to me in the exhibit earlier. But
3 it's possible and probable that he did give it to me.
4 I'm not denying he didn't.

5 Q Do you know --

6 A I just don't recognize it.

7 Q Do you know if you printed off any of these
8 documents from the disk to paper format?

9 A I don't recall.

10 [Playing Exhibit 61H.]

11 BY MS. BAIRD:

12 Q And do you recognize this document?

13 A It's part of Exhibit -- Citizen Complaint Form,
14 Exhibit 61A.

15 Q And do you recognize this document as having
16 been received in the course of your investigation of
17 Mr. Peruta's complaint?

18 A It doesn't look familiar to me, but it's
19 possible.

20 [Playing Exhibit 61H.]

21 BY MS. BAIRD:

22 Q Do you recognize this document as having been
23 received from Mr. Peruta regarding his complaint?

24 A I don't recognize it. It's been a long time,
25 but it's -- again, it's possible and even probable that

1 he did give that to me.

2 Q All right.

3 [Playing Exhibit 61H.]

4 BY MS. BAIRD:

5 Q Okay. Do you recognize this document as having
6 been provided by Mr. Peruta related to the complaint?

7 A Again, I recognize this document because it was
8 in the exhibit that you showed me earlier, but I don't
9 have a specific recollection of that document. I do
10 remember him citing a Monell claim. So that Monell claim
11 is familiar to me.

12 [Playing Exhibit 61H.]

13 BY MS. BAIRD:

14 Q Do you recognize that document?

15 A No, I don't recognize it.

16 Q Okay.

17 A Not from memory.

18 [Playing Exhibit 61H.]

19 BY MS. BAIRD:

20 Q Okay. And do you recognize this as having
21 received it related to Mr. Peruta's complaint?

22 A I mean, if that's the document I signed for,
23 then yes.

24 Q Okay. Now --

25 A I'm sorry. Attorney Baird, can you go back to

1 that document, please?

2 Q Sure. The last one?

3 A Yeah, the last one.

4 [Replaying Exhibit 61H.]

5 MS. BAIRD: Oh, I know. Cover your eyes.

6 Oh, my God.

7 MS. FEOLA-GUERRIERI: For the record, we're
8 not looking.

9 BY MS. BAIRD:

10 Q Okay. Here we go. You wanted me to go back to
11 the last one that is Citizen Complaint Form?

12 A Yeah. It's not the same as the one in this
13 exhibit.

14 Q Right.

15 A It's different handwriting, it's the -- the
16 phone numbers don't line up the same way that they're
17 written on this particular form. So I'm just -- I'm just
18 noting that that document that's up there is not matching
19 with this 61A.

20 Q Okay. And do you recall receiving the document
21 on 61H that's listed as Citizen Complaint Form in one
22 page?

23 A 61H?

24 MS. FEOLA-GUERRIERI: That.

25

1 BY MS. BAIRD:

2 Q Yes. Is it 61H? I? 61H.

3 A I'm sorry. Can you --

4 Q Oh. We were going through the documents on 61H.
5 Do you remember receiving the Citizen Complainant Form
6 that's up on the screen as part of Exhibit 61H?

7 A Well, what I'm saying is I did receive a Citizen
8 Complaint Form from the City of Hartford for Mr. Peruta's
9 complaint. You know, you've showed me this other
10 document here, the Citizen Complaint Form, and I'm just
11 pointing out that these two documents are not the same
12 documents.

13 Q Okay.

14 A So I can't say that it was this one or that one
15 that I received because the handwriting is not the same,
16 it's not the same -- the phone numbers are not aligning.
17 So it looks like that's a written -- it's not the same as
18 this 61A.

19 Q Citizen Complaint Form.

20 A Correct. Correct. It's not -- I mean, in here
21 the numbers of the area code are above the 978. That one
22 it's straight out. So I don't know which one I received,
23 if there's multiple versions of this first page of the
24 Citizen Complaint form. I know I signed for one. It had
25 information on it, but I don't know if it's that one or

1 this one that I received because they're different.

2 Q Okay.

3 A Oh, no. That would have been the one that he
4 submitted directly to Internal Affairs which would --

5 Q Well, I can't answer questions.

6 Do you recall receiving 19 video clips from
7 Mr. Peruta about the Park Street incident?

8 A I don't recall receiving 19 clips.

9 Q I am going to play the first clip that indicates
10 "Hartford Shooting and the First Amendment" and then,
11 after it plays, ask you if you recognize the video from
12 the investigation.

13 A Okay.

14 Q Let's hope this works.

15 [Playing Exhibit 61H.]

16 BY MS. BAIRD:

17 Q Ms. Bainer, we've just had the opportunity to
18 review a 3-minute-and-32-second video on Exhibit 61H. Do
19 you recognize that video?

20 A Yes. That's familiar to me.

21 Q And did you -- did you obtain that video or did
22 Mr. Peruta provide that video --

23 A Yes.

24 Q -- to you?

25 A He did.

1 Q And earlier in your testimony today you had
2 mentioned a video. Is that what you recall --

3 A Yes.

4 Q -- as the video?

5 A That is -- that is what I recall as the video.

6 Q Do you recall looking at any other videos
7 associated with Mr. Peruta's case?

8 A I don't off the top of my head.

9 Q Do you recall if Mr. Peruta provided you any
10 other videos besides the one associated -- besides the one
11 you've just testified to that you've seen before?

12 A I don't believe he did. I don't recall that he
13 did. I only recall one video.

14 Q Okay. And this is Exhibit 61H. I'm going to
15 show you a couple of clips, at least, from Exhibit 61H to
16 see if you recall --

17 A Okay.

18 Q -- seeing them.

19 This is Clip 1.

20 [Exhibit 61H Played.]

21 A Do remember seeing that.

22 [Exhibit 61H Paused.]

23 A I do recall that, Attorney Baird.

24 BY MS. BAIRD:

25 Q Okay. So if that's Clip 1 and if that is --

1 that is Clip 1, and your testimony is that you recall
2 seeing that?

3 A Yes.

4 Q This is Clip 2.

5 [Exhibit 61H Played and Paused.]

6 BY MS. BAIRD:

7 Q Do you recall Clip 2?

8 A I don't recall that one off the top of my head,
9 but if it was on the CD that he provided me, then I most
10 likely looked at all of them. I typically don't skip
11 over stuff. That just isn't implanting on my brain or
12 memory.

13 Q This is Clip 3.

14 [Exhibit 61H Played and Paused.]

15 BY MS. BAIRD:

16 Q Do you recall seeing Clip 3?

17 A I don't recall it off the top of my head.

18 Q This is Clip 4.

19 [Exhibit 61H Played and Paused.]

20 A I don't recall that video.

21 BY MS. BAIRD:

22 Q Did you at any point convey to Ms. Knight, when
23 you were attempting to find out from her the identity of
24 the officer or officers, that there were video photographs
25 of officers?

1 A No. Again, I just didn't think -- I just didn't
2 think to screen-shot a picture of the officer. It didn't
3 enter my -- just didn't enter my consciousness.

4 Q This is Clip 5 in Exhibit 61H.

5 [Exhibit 61H Played and Paused.]

6 BY MS. BAIRD:

7 Q Do you recall seeing that?

8 A I don't.

9 Q Okay. Clip 6.

10 [Exhibit 61H Played and Paused.]

11 BY MS. BAIRD:

12 Q For the record, Clip 6 on Exhibit 61H, did it
13 appear to you to not have any video?

14 A It just did when you played it.

15 Q Right. But there was audio, but no video.

16 A Yeah, there could -- yes.

17 Q This is Clip 7.

18 [Exhibit 61H Played and Paused.]

19 BY MS. BAIRD:

20 Q Do you recall viewing Clip 7 in Exhibit 61H
21 related to Mr. Peruta's complaint?

22 A I believe that was a clip that was taken from
23 that video -- the long video.

24 Q The 3-minute-and-32-second video?

25 A Yeah. Yes.

1 Q This is Clip 8.

2 [Exhibit 61H Played and Paused.]

3 BY MS. BAIRD:

4 Q Did you have an opportunity to see Clip 8? It
5 was very short; right?

6 A It was like a blip.

7 Q Okay. Clip 9.

8 [Exhibit 61H Played and Paused.]

9 A That I believe was also a segment of the
10 3-minute-and-32-second clip.

11 BY MS. BAIRD:

12 Q This is Clip 10.

13 [Exhibit 61H Played and Paused.]

14 BY MS. BAIRD:

15 Q Do you recall Clip 10?

16 A I believe that also was a portion of the
17 3-minute-and-32-second video.

18 Q Clip 11.

19 [Exhibit 61H Played and Paused.]

20 BY MS. BAIRD:

21 Q Do you recall Clip 11 -- viewing that?

22 A Again yes, it was part of the larger video.

23 Q This is Clip 12.

24 [Exhibit 61H Played and Paused.]

25

1 BY MS. BAIRD:

2 Q Do you recall viewing Clip 12?

3 A I do, as part of the larger video.

4 Q Clip 13.

5 [Exhibit 61H Played and Paused.]

6 BY MS. BAIRD:

7 Q Do you recall viewing Clip 13?

8 A I do, as part of the larger video.

9 [Exhibit 61H Played and Paused.]

10 BY MS. BAIRD:

11 Q Do you recall Clip 14?

12 A I do, as part of the larger video.

13 Q Okay. This is Clip 15.

14 [Exhibit 61H Played and Paused.]

15 BY MS. BAIRD:

16 Q And do you recall Clip 15?

17 A I do. It's part of the 3-minute-and-32-second
18 video.

19 Q This is Clip 16.

20 [Exhibit 61H Played and Paused.]

21 BY MS. BAIRD:

22 Q Do you you recall Clip 16?

23 A I specifically recall Clip 16.

24 Q And why is that?

25 A Because he -- the officer said that there was a

1 secondary crime scene and was pushing everybody back.

2 Q Okay. And do you have any independent knowledge
3 about that secondary crime scene?

4 A I don't.

5 Q This is Clip No. 17.

6 [Exhibit 61H Played and Paused.]

7 BY MS. BAIRD:

8 Q Do you recall viewing any part of or all of the
9 video? It's a 4-minute-and-10-second video clip, No. 17.

10 A I do -- I do have a vague recollection of that,
11 specifically being that the argument that was taking
12 place about his right to film. I do have a recollection
13 of that.

14 Q And do you know if you obtained that clip from
15 Mr. Peruta?

16 A I really don't know. I have a vague
17 recollection of that. I can't say for sure that I
18 definitely saw that video, but I do have a recollection
19 of it. And if he provided it to me, I certainly did see
20 it.

21 Q And this is Clip 18.

22 [Exhibit 61H Played and Paused.]

23 BY MS. BAIRD:

24 Q Anything about Clip 18 that you recall?

25 A Yeah, that's the end of the video. It's the end

1 portion of the 3-minute-and-32-second video.

2 Q And this is Clip 19.

3 [Exhibit 61H Played and Stopped.]

4 BY MS. BAIRD:

5 Q Do you recall anything about Clip 19?

6 A I don't recall that specifically.

7 Q This is Exhibit 57. Have you ever reviewed the
8 ordinance reflected in Exhibit 57, Section 2-196?

9 A I have.

10 Q Is that ordinance an ordinance you rely upon in
11 your role of investigating complaints for the Civilian
12 Review Board?

13 MS. FEOLA-GUERRIERI: Objection to form.

14 A I don't specifically regularly refer to this
15 document, but I have seen and investigated the -- you
16 know, the process of the Civilian Review Board when I
17 first came on board with the company and started doing
18 these investigations. I do recall reading this and
19 probably thereafter, but I don't rely upon it on a
20 regular basis.

21 BY MS. BAIRD:

22 Q Who does ISS report to in the City of Hartford
23 with regard to its investigations?

24 A We don't really -- we submit our final reports
25 to Corporation Counsel. But we don't really report to

1 anybody in the city specifically, except for to just, you
2 know, maybe get clarification on something. It's my
3 understanding that we report for the Civilian Review
4 Board, but the final reports are sent to the Corporation
5 Counsel to be processed and then assigned on the agenda.

6 Q Okay. Since 2009 when you first became employed
7 with ISS, have you attended any Civilian Review Board
8 meetings?

9 A I have attended a few.

10 Q When was the last one?

11 A I'm not really sure.

12 Q And what would have been the purpose for
13 attending a Civilian Review Board meeting?

14 A To be present in case the Civilian Review Board
15 members had any questions specifically when -- I do
16 recall going to a Civilian Review Board meeting with a
17 woman who was doing investigations for us who trains --
18 trained an investigator -- trained police at the Police
19 Academy, and she did an investigation for us. Her name
20 was Donna Nicholson. It was an excessive force case.

21 She came with me to the meeting to demonstrate
22 to the Civilian Review Board members why we believed it
23 was excessive force and to actually show police
24 procedures and tactics and why this particular person --
25 it was a head blow, so -- and why that's against policy

1 and procedure. So ...

2 Q And the policy or procedure that you were
3 referencing was Hartford Police Department policy --

4 A It was both.

5 Q -- or procedure?

6 A It was both, but it was just force -- use of
7 force. And also as it's taught in the Policy Academy to,
8 you know, any officers looking to get a job with any
9 department. So Ms. Nicholson is a professor of criminal
10 justice at Manchester Community College and she did some
11 investigations for us, and we thought it was really
12 important in this particular case that she go and
13 demonstrate for the Civilian Review Board.

14 Q When was that?

15 A I want to say 2011 maybe, 2012?

16 Q Okay. I recall, and correct me if I'm wrong,
17 that with regard to Exhibit 61B -- if you still have that
18 in front of you?

19 A B?

20 Q Yes. It's the City of Hartford, March 26th,
21 2015, memorandum.

22 A Yes.

23 Q You had indicated that you had not seen the
24 interdepartmental memorandum contained in the second,
25 third, and fourth pages of Exhibit 61B previously;

1 correct?

2 A That's correct, yes. I mean I don't recall that
3 I saw this. And typically I don't see any Internal
4 Affairs investigation reports.

5 Q That's what I was going to ask you. Are there
6 occasions when you do see I.A. reports?

7 A There have been maybe two occasions, and one was
8 even very recently where the complainant was complaining
9 about the Internal Affairs investigation and the previous
10 independent investigator that had been assigned. So I
11 was looking at the previous independent investigation
12 which was done by S.S.I., and then -- and I did ask and
13 they -- the City of Hartford provided me with the
14 Internal Affairs investigation that was conducted with
15 respect to the complainant.

16 But typically I don't have any -- you know, I
17 would only get this if I requested it under Freedom of
18 Information Act. These documents are not provided to me.

19 MS. BAIRD: Okay. I'm going to take -- I
20 believe I'm done, but I'm going to take a
21 10-minute break, just to -- it may only be
22 five -- and just review things, and then we'll
23 possibly of be out of here. Okay?

24 THE WITNESS: Thank you.

25 MS. HARRIS: I will have a few questions.

1 MS. BAIRD: Oh, I forgot.

2

3 [Off record: 12:31 p.m. to 12:41 p.m.]

4

5 MS. BAIRD: On the record.

6 The plaintiff has concluded their

7 questioning. Thank you every much.

8 THE WITNESS: You're welcome. Thanks.

9

10 CROSS-EXAMINATION

11

12 BY MS. HARRIS:

13 Q Ms. Manning, I have -- Bainer, I'm sorry.

14 A That's okay.

15 MS. FEOLA-GUERRIERI: We've been reading

16 your reports with your name.

17 BY MS. HARRIS:

18 Q I have a few follow-up questions. Everything --
19 grab Exhibit 61C, please.

20 A My reports?

21 Q Which are the reports, yes.

22 So the second page, Report No. 2, I just want to
23 make sure that I got this correctly. On that page where
24 it says "The complainant stated" and then there's a
25 series of 11 bullet points that follow, that section

1 would have been written by Christine --

2 A Kristin.

3 Q Kristin, sorry, Brazalovich?

4 A Brazalovich.

5 Q Brazalovich. Thank you. Is that correct?

6 A That's correct.

7 Q Were you a participant in that phone
8 conversation?

9 A No.

10 Q Okay. Did your office typically record
11 conversations?

12 A No.

13 Q Okay. Do you ever record conversations?

14 A Unless the attorney for whoever we're working
15 for specifically directs us to do so as a dying
16 declaration. But we do not.

17 Q So in this case, this phone conversation would
18 not have been --

19 A No.

20 Q -- recorded in any way.

21 A No.

22 Q Okay. Going on to the next report, No. 3.

23 Again, this is a report that you -- you authored; correct?

24 A Yes.

25 Q All right. A couple of quick questions here.

1 So looking at just the first paragraph, it said the
2 complainant came and provided the full video recording of
3 the incident with HPD, and case law to support his First
4 Amendment violation claim.

5 So is this documenting a conversation you
6 actually had -- you personally had with Mr. Peruta;
7 correct?

8 A That's correct.

9 Q All right. Was anybody else present for that
10 conversation, other than you and Mr. Peruta?

11 A No.

12 Q And I apologize if I'm repeating some of
13 Rachel's questions.

14 Looking at the fourth paragraph, the first
15 sentence. You wrote "The complainant was also
16 particularly upset that officers continued to tell him to
17 get back and stop filming and when he did not stop
18 filming they threatened to arrest him," end quote.

19 Did I read that first sentence correctly?

20 A Yes.

21 Q Do you have a recollection of your conversation
22 with Mr. Peruta?

23 A Vague, but yes.

24 Q All right. Did Mr. Peruta specifically tell you
25 that the officers told him to stop filming?

1 A Yes.

2 Q Okay. We just had the opportunity to review
3 multiple video clips that were on the CD that was provided
4 to you by Mr. Peruta; correct?

5 A Correct.

6 Q Am I correct that nowhere on that video does any
7 officer captured tell -- ordering him to stop filming?

8 A To the best of my recollection from what I just
9 saw, they just said "you're not filming a dead body."

10 Q Okay, but --

11 A I didn't --

12 Q -- he continued to film; correct?

13 A That's what it appeared, yes.

14 Q All right. And prior -- all right, let me back
15 up.

16 There's video in that, the video we just
17 watched, where the officers are pushing the crime scene
18 tape back; correct?

19 A Correct.

20 Q And they're generally ordering Mr. Peruta and
21 the other people who are present to get back.

22 A Correct. He said, "Everyone get back."

23 Q Right. At any time before the statement "no,
24 you're not going to film a dead body" did you hear any
25 officer tell Mr. Peruta to stop filming?

1 A No.

2 Q Okay. Did Mr. Peruta tell you that any officer
3 had ever placed their hands on him?

4 A I don't recall that he did say that.

5 Q Okay. Did Mr. Peruta claim that any officer
6 tried to take his film?

7 A I don't believe he did say that. I don't recall
8 him saying that.

9 Q All right. But Mr. Peruta did tell you that the
10 officers told him to -- ordered him to stop filming.

11 A Yes. That would be -- that's what I wrote in my
12 report, yes.

13 Q Okay. I'm going to go back to the video clip,
14 but -- all right.

15 At the time that you had this conversation with
16 Mr. Peruta on approximately September 24th, 2014, had you
17 yet reviewed that video that Mr. Peruta provided you?

18 A I don't believe that I had.

19 Q Did you review the video with Mr. Peruta?

20 A No.

21 Q Did you have any conversation with Mr. Peruta --
22 well, let me back up.

23 The video we just watched had -- there was --
24 the first video we watched was approximately a 3-minute
25 video that was compiled by Mr. Peruta with captioning;

1 correct?

2 A Correct.

3 Q All right. You understand that that's a video
4 that was edited by Mr. Peruta and put together by
5 Mr. Peruta; correct?

6 A Correct.

7 Q All right. The subsequent video clips that we
8 watched after that, the approximately 19 clips, did you
9 have any conversation with Mr. Peruta about what was
10 occurring in between those clips and what is not captured
11 on video?

12 A No.

13 Q All right. And then going down, still on Report
14 No. 3 which is a part of Exhibit 61C, the last paragraph
15 on the bottom of that first page states -- and I'm going
16 to read it. "The complaint" -- which should say
17 "complainant" -- "said the officer in charge in the video,
18 in a white tee shirt with the badge around his neck is the
19 person who violated his rights. He doesn't blame the
20 officer who told him to stop filming because he was only
21 following orders," end quote.

22 Did I read that correctly?

23 A That's correct.

24 Q All right. Again, did Mr. Peruta say that there
25 was any officer who told him to stop filming, other than

1 the officer with -- in the white T-shirt?

2 A Yes. He said that the officer in the white
3 T-shirt told another officer to direct him to stop
4 filming.

5 Q Okay. Were you provided with any video evidence
6 that captured a conversation in which an officer directed
7 another officer to tell him to stop filming?

8 A I didn't hear that. There was nothing that I
9 heard in audio that captured that.

10 Q Okay. And did Mr. Peruta tell you that he did
11 not have a complaint against any officer other than the
12 officer in the white T-shirt?

13 A Yes.

14 Q All right. We just watched the series of videos
15 that was on the CD. Were you provided with any other
16 video evidence from Mr. Peruta other than what we've just
17 watched?

18 A Not that I recall.

19 Q Did you have any conversation with Mr. Peruta
20 about his editing process for the video?

21 A No, I did not.

22 Q Did you have any conversation with Mr. Peruta
23 about why the video was in multiple clips as opposed to a
24 steady stream of video?

25 A No, I did not.

1 Q Some of this may be covered by what Attorney
2 Baird asked you previously, but at the time that you were
3 investigating this matter, you did not have access to any
4 of the police reports; correct?

5 A I didn't ask for them and, yes, I wouldn't
6 assume I would have access since it's an open homicide
7 investigation.

8 Q Okay. And did you talk to any person other than
9 Mr. Peruta?

10 A No, I did not.

11 Q So you did not have any information as to
12 whether additional information had been gathered by the
13 police which caused them to enlarge the crime scene;
14 correct?

15 A That's correct.

16 Q All right. And you didn't have any information
17 regarding whether or not they needed to force entry into a
18 nearby building; correct?

19 A That's correct.

20 Q If you could turn to your Report No. 5, which is
21 the October 20th, 2014, report which is included within
22 Exhibit 61C.

23 Under the findings -- the second paragraph under
24 "Findings" there, it says, "This complainant is
25 ultimately seeking a mandate that all Hartford police

1 officers be trained in the First Amendment. The
2 complainant has also made it clear that he intends to
3 take this matter all the way to the Supreme Court. The
4 complainant was advised that our role is simply to
5 determine if the evidence supports his claims."

6 A Correct.

7 Q Those first two statements, first of all, "the
8 complainant is ultimately seeking a mandate that all
9 Hartford officers be trained in the First Amendment," is
10 that something that Mr. Peruta told you?

11 A Yes.

12 Q When did he tell you that?

13 A During the interview that I had with him.

14 Q Did you only speak to Mr. Peruta that first
15 occasion?

16 A What do you mean? I'm sorry.

17 Q Approximately how many times did you speak
18 directly to Mr. Peruta in the course of your
19 investigation?

20 A The one -- again, I believe I had a phone call
21 with him to set up the meeting for the 24th. I had met
22 with him on this particular case.

23 He may have called me one other time after this,
24 I'm not really sure. But I do know that he did end up
25 calling me several months after I completed the

1 investigation at my office because someone, I guess, in
2 the City of Hartford -- at least this is what he said to
3 me -- had told him that I had found against him and he
4 was very upset about it.

5 Q Okay. I'm going to circle back to that, but let
6 me stay in the course of your investigation.

7 A Yeah.

8 Q So let me just make sure I'm clear. You had the
9 initial phone call to set up the interview with
10 Mr. Peruta; correct?

11 A Correct.

12 Q And you actually had an interview with
13 Mr. Peruta.

14 A Correct.

15 Q You did not review that video with him during
16 the interview.

17 A I believe I did not. I don't think that I did
18 review that video with him. It's possible I did, but I'm
19 not positive. But I know that I definitely reviewed it
20 afterwards in detail without him present.

21 Q Okay. After you viewed the video, did you have
22 any further conversation with Mr. Peruta about your
23 investigation of his complaint?

24 A I'm not sure if I did speak to him again while
25 my investigation was still open. I don't know.

1 Q Okay.

2 A I do know that he did call me months later.

3 That -- that I do recall.

4 Q Okay. I want to stick right now for just the
5 course of your --

6 A I don't recall --

7 Q -- during the course of your investigation.

8 A I don't recall if we had a follow-up phone call
9 after this in-person interview. It's possible, but I
10 don't recall.

11 Q Okay. The second -- looking again at Report
12 No. 5, which is the October 20, 2014, which is part of
13 Exhibit 61C, that second sentence says "The complainant
14 also made it clear that he intends to take this matter all
15 the way to the Supreme Court."

16 A Yes.

17 Q Is that something Mr. Peruta told you?

18 A Absolutely.

19 Q So was it Mr. Peruta's -- did Mr. Peruta express
20 to you that he intends to take the matter all the way to
21 the Supreme Court regardless of what the finding was?

22 A What he said to me is that -- that he knows how
23 this process works. That the chief is ultimately -- even
24 if we find in his favor, the chief is ultimately going to
25 squash it and that he'll have to bring it forward to the

1 Supreme Court, and he intends to take it all the way to
2 the Supreme Court.

3 Q So that was his opinion that he stated to you.

4 A Correct.

5 Q Okay. And at the time that you had spoken to
6 Mr. Peruta, he had already uploaded his video to YouTube;
7 correct?

8 A I think so.

9 Q Ms. Bainer, what -- you're not an attorney;
10 correct?

11 A That's correct.

12 Q Have you attended law school?

13 A No.

14 Q Okay. Your report makes a few references to you
15 tried to conduct some legal research; correct?

16 A Correct.

17 Q Do you have Lexis in your office?

18 A We do.

19 Q All right. What training have you had in how to
20 conduct legal research?

21 A No formal training in conducting legal research.
22 I did attempt to use LexisNexis, but then I also used
23 Google Scholar. I don't know if I mentioned that in my
24 report, but I did use Google Scholar basically under
25 "case law cited" and ...

1 Q Okay. And if you could look at the e-mails that
2 are at the back of Exhibit 61C. Looking -- so I'm looking
3 at the October 21st, 2014, e-mail timed at 9:24 a.m.
4 That's the e-mail that you sent to Anlinda Knight;
5 correct?

6 A Yes.

7 Q All right. And that e-mail only states, Can you
8 identify the officers who are the subject of this
9 complaint, thank you? Is that correct?

10 A That's correct.

11 Q All right. Did you ever indicate to Ms. Knight
12 that you were specifically asking to identify the officer
13 in the white T-shirt?

14 A No.

15 Q Okay. At the times that you spoke with
16 Mr. Peruta, did he know the name of the officer?

17 A No.

18 Q You stated earlier that at some point you have
19 communicated with Lieutenant Michael Coates; is that
20 correct?

21 A Yes.

22 Q Did you communicate with Lieutenant Michael
23 Coates specifically regarding this case?

24 A I don't believe so.

25 MS. HARRIS: I don't have any other

1 questions.

2 MS. FEOLA-GUERRIERI: I have a couple
3 follow-up questions, Ms. Bainer.

4

5 CROSS-EXAMINATION

6

7 BY MS. FEOLA-GUERRIERI:

8 Q On 61C, the second page and the third page are
9 Report Nos. 2; correct?

10 A Yes.

11 Q And you indicated that this was information
12 contained within Integrated Security Services' records,
13 correct, on this file?

14 A No. This information was taken from a telephone
15 interview that Ms. Brazalovich conducted with the
16 complainant.

17 Q I understand, but what I'm asking you is is this
18 a business record of Integrated --

19 A Yes.

20 Q -- Security Services?

21 A That's correct.

22 Q And is this a document and report that you
23 relied on in coming to your Investigative Summary?

24 A Yes.

25 Q And so even though you did not personally have

1 conversations with Mr. Peruta, and Ms. Kristin Brazalovich
2 did on this particular date, is all of the information
3 contained within paragraphs 1 through 11 consistent with
4 the information you, yourself, personally received from
5 Mr. Peruta?

6 A Well, I'll have to look that over right now.

7 Yes.

8 Q Okay. So is it fair to say that the statements
9 that are attributed to Mr. Peruta, as reflected in Report
10 No. 2, are consistent with what he told you?

11 A That's correct.

12 Q Okay. And essentially you understood his
13 complaint to be against one particular officer: The one
14 in the white T-shirt.

15 A Correct.

16 Q That he was not making a claim against any other
17 officer.

18 A Correct.

19 Q Or the Chief of Police for that matter.

20 A Correct.

21 Q Or the City of Hartford for that matter.

22 A Correct.

23 Q Okay. And, in fact, he actually admitted in one
24 of the reports that he didn't even place blame on the
25 other officers.

1 A That's correct.

2 Q Okay. So your charge, in your mind, was to
3 investigate any potential civil rights violation -- i.e.,
4 First Amendment violation -- of that white T-shirt
5 officer.

6 A Correct.

7 Q All right. Now, the other complaint -- I'm
8 sorry -- the complaint essentially from your
9 understanding, is it fair to say, was that he was directed
10 several times to stop filming?

11 A Correct.

12 Q Okay. Did you see any evidence presented by
13 Mr. Peruta, or otherwise, that indicated that he was
14 ordered to stop filming at any time?

15 A Not in those words. I did see the officer
16 clearly in the video -- well, didn't see him. Actually
17 heard someone telling him "you're not filming a dead
18 body."

19 Q "You're not filming a dead body" --

20 A Dead body --

21 Q -- is different from saying stop filming
22 altogether.

23 A Correct.

24 Q All right. So then is it fair to say then that
25 what Mr. Peruta was complaining about -- i.e., that the

1 officer told him to stop filming -- was not supported by
2 the evidence?

3 A Yes, that's fair to say.

4 Q And that was essentially part and parcel of your
5 conclusion.

6 A I didn't see it that way at the time, but yes.

7 Q Well, you indicated in your testimony that you
8 researched the cases that he provided and did not find
9 that they were analogous to this situation.

10 A Correct.

11 Q All right. And in 61C, first page of Report
12 No. 3 --

13 A Yes.

14 Q -- under the "Detail" section, first paragraph,
15 it states, "On this date, the complainant came to 40 Russ,
16 Hartford, Connecticut to provide the full video recording
17 of the incident with HPD and case law to support his First
18 Amendment violation claim."

19 Does that sentence that is contained in your
20 Report No. 3 dated September 24th, 2014, confirm that
21 Mr. Peruta actually provided you with those recordings
22 and the case law?

23 A True. That's correct.

24 Q I'm just going to show you a photocopy of the
25 outside portion of the disk that was contained and marked

1 in a previous exhibit, which was the disk. Do you
2 recognize receipt of that disk?

3 A I can't say that this was the disk itself. He
4 did give me a disk.

5 Q One disk.

6 A One disk.

7 Q Okay. And you can see there's handwriting on
8 this disk?

9 A Yeah.

10 Q Is that your handwriting?

11 A No, that's not my handwriting.

12 Q Okay. And do you see on the disk it says "raw &
13 edited video," "various documents," "1st Amendment"?

14 A Yes.

15 Q That is not your handwriting; correct?

16 A That's not my handwriting, no.

17 Q And it says on the right side "failure to
18 train"?

19 A That's not my handwriting.

20 Q "Fit property of American News"?

21 A No, that's not my handwriting.

22 Q Did you understand Mr. Peruta was affiliated
23 with American News?

24 A Yes.

25 Q Okay. Report No. 4, the fourth full paragraph

1 under "Details." You've already indicated you drafted
2 this, despite the fact that --

3 A Yes.

4 Q -- it has this error, correct --

5 A Yes.

6 Q -- as to the investigator?

7 A That's correct.

8 Q It indicates in the second sentence "There were
9 other spectators behind the crime scene tape perimeter,
10 but the officer targeted the complainant and told him to
11 stop filming."

12 Is that statement essentially a summary of what
13 Mr. Peruta was complaining about?

14 A I'm sorry. Where are you referring to?

15 Q The fourth full paragraph under "Details,"
16 second sentence.

17 A Sorry.

18 Q And it starts "there were other."

19 A -- "which clearly does show the Caucasian
20 officer with the white tee shirt and the badge around his
21 neck"? Is that what you're talking about?

22 Q Yes, but the second sentence.

23 A "There were other spectators behind the crime
24 scene tape perimeter, but the officer targeted the
25 complainant and told him to stop filming. At one point,

1 the officer is heard saying 'you're not filming a dead
2 body.' It's clear that" -- yes.

3 Q Okay. So I just -- I'm just asking the
4 question, the second sentence there that starts "there
5 were other spectators behind" --

6 A Mm-hmm.

7 Q Okay? Is that your understanding of what he was
8 complaining about?

9 A That's -- yes.

10 Q Okay.

11 A That is my understanding.

12 Q And again, his complaint was that he was told to
13 stop filming altogether.

14 A Correct.

15 Q Now, you -- in the second page of Report No. 5,
16 the fourth paragraph down again, starting "The
17 complainant"?

18 A Mm-hmm.

19 Q Okay. You see that?

20 A Yes.

21 Q All right. And you write "The complainant
22 claims he was harassed because he was told five times to
23 shut off the camera and threatened with arrest when he
24 repeatedly refused." Do you see that?

25 A Yes, I do.

1 Q Is that what he told you?

2 A Yes.

3 Q So he told you that he was told five times to
4 shut off the camera and threatened with arrest.

5 A Yes. Correct.

6 Q Okay. And did you see any evidence of that?
7 That he was told five times to shut off the camera?

8 A No. Again, I heard several times "you're not
9 filming a dead body," "you're not filming a dead body,"
10 "you're not filming a dead body." But not specifically
11 "stop filming." Or "turn off the camera."

12 Q All right. And "The assigned finds that
13 complainant wilfully disobeyed the officer because he
14 chose to debate the First Amendment at a homicide crime
15 scene. This does not constitute harassment."

16 So is it fair to say in that sentence your
17 finding was that he disobeyed the verbal commands of the
18 officer on the scene?

19 A That's correct.

20 Q And that's a crime; correct?

21 A Yes. That would be interfering or -- typically
22 interfering and ...

23 Q Okay. Now, you also said that you had a
24 conversation with Mr. Peruta after -- sometime after your
25 report was submitted and he called you.

1 A Yes.

2 Q Can you please tell me what happened?

3 A Well, I answered the phone at the office. He
4 called the direct line at the office and he said,
5 "Looking for Ms. Manning," and I said, "This is her," and
6 he said, "This is Mr. Peruta," and I said, "Oh, hello
7 Mr. Peruta," something to that effect. I don't remember
8 the exact words that were exchanged, but he did tell me
9 that he had a contact in the City of Hartford who told
10 him that I had found against him, and he was very, very
11 upset about that. And I told him that I could not
12 discuss findings until it came up for Board review. I'm
13 under policy, I can't discuss it. And he said, you know,
14 "I'm very, very upset," and I said, "That's your
15 prerogative" and the phone call ended.

16 Q Okay. Did you feel threatened at any -- by his
17 tone?

18 A I'm just -- I don't -- didn't feel physically
19 threatened, but generally speaking he's an extremely
20 aggressive person and he is at times antagonistic. I
21 find his behavior to be just generally unpleasant, my
22 communications with him.

23 Q Well, what did you understand, if anything, was
24 the purpose of his call to you?

25 A Just to let me know that he wasn't happy that I

1 found against him. I didn't know if he expected me to
2 talk about it with him, but I couldn't, and told him that
3 I couldn't discuss it until it came up for Board review.

4 Q Okay. And was that the last time you've ever
5 had communication with him?

6 A Direct communication, yes.

7 Q Okay. Any indirect communication?

8 A Yes. Back in I think it was September of 2016,
9 he -- Mr. Peruta approached one of my colleagues in
10 Integrated Security Services -- his name is Andy
11 Thibault -- and he gave him a copy of an F.O.I. request
12 that he was going to submit to the City of Hartford. I
13 have a copy of that. And it basically was asking for all
14 of Integrated Security's billing for the City of Hartford
15 and our contract since the inception of our contract --

16 Q And how did you come to know that?

17 A My colleague called me and said that Mr. Peruta
18 had called him and said that he needed to speak with him
19 urgently; that he needed to come over to his house. That
20 he went to my colleague's house and handed him this
21 Freedom of Information Act request that he intended to
22 hand-deliver to the City of Hartford for our bills, and
23 made -- and read some of the lines out of my report to my
24 colleague. And then also basically -- to Andy's -- to my
25 colleague's words, that he implied that Integrated

1 Security writes reports for the City of Hartford in a
2 manner that protects them from lawsuits.

3 Q Okay. And so is it your understanding through
4 conversations with Mr. Thibault that Mr. Peruta actually
5 went to his residence?

6 A Yes.

7 Q Was that by consent?

8 A Andy -- Mr. Peruta apparently, from my
9 conversation with Andy, called him, said he needed to
10 speak with him urgently, can he come to his house? Andy
11 said sure. So he came to his house, which is in
12 Litchfield and I guess not very far from this office.

13 Q I see. And have you had any communications --
14 aside from what you had already indicated, any other
15 indirect communications with Mr. Peruta?

16 A No.

17 Q Okay. And what about any communications other
18 than what you've already testified to with Attorney Baird?

19 A No.

20 Q Okay. All right.

21 MS. FEOLA-GUERRIERI: I have no further
22 questions.

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REDIRECT EXAMINATION

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BY MS. BAIRD:

Q Did Mr. Thibault indicate to you that he knew Ed Peruta --

A Yes.

Q -- prior to that meeting at the residence?

A Yes. He was familiar with Mr. Peruta; correct.

Q Familiar with him. And that they had met on previous occasions where --

A Yes.

Q -- I was present?

A Yes.

Q Mr. Thibault's familiar with me?

A He did.

Q I live in Litchfield?

A Yes. Correct.

Q Okay. And I'm well aware of where Mr. Thibault lives?

A Well, he didn't say that --

Q Okay.

A -- but if you are, then you are.

Q Okay. Did you make any notes about the conversation that you had with Mr. Peruta that you described him being upset about your findings?

1 A No.

2 Q Did you inform the Office of Corporation Counsel
3 about it?

4 A I think I might have called Kimberly Taylor and
5 advised her that I -- I possibly did.

6 Q Do you know if you sent an e-mail to Ms. Taylor
7 about the conversation with Mr. Peruta?

8 A It's possible I did, but I -- I don't -- I don't
9 recall.

10 Q Now, have you had any training in taking
11 statements from complainants or witnesses?

12 A Yes.

13 Q What kind of training have you had?

14 A I was trained by the first investigation agency
15 that I worked for. A retired State Police Major, Greg
16 Senick, I worked under his direction for two years and I
17 was trained in how to take a witness statement basically.
18 And I am a notary, so I can take sworn affidavits.

19 Q Okay. And you'll agree that reports -- Report
20 No. 5 in Exhibit 61C is not notarized by -- by Mr. Peruta
21 certainly?

22 A That's -- yes -- wait. That's correct. Yes.

23 Q Okay. And that, in fact, it's not even
24 notarized by you, is it?

25 A Wait. I'm sorry. Are you referring to Report 5

1 as my synopsis?

2 Q Yes.

3 A Yes. This is a final report, it's not a
4 statement that was taken. I mean, I do refer statements
5 made to me, but it's not a formal statement.

6 Q Okay. Well, is there any formal statement that
7 you took of Mr. Peruta?

8 A No.

9 Q So there is no notarized statement that you took
10 of Mr. Peruta.

11 A That's correct.

12 Q And were you trained by Mr. Senick, or through
13 any other training at taking statements, that there are a
14 number of ways to take statements? The person can write
15 the statement out themselves.

16 A Yes.

17 Q You can write the statement based on what they
18 say.

19 A Absolutely.

20 Q And after the person writes the statement out
21 themselves, they sign it.

22 A Yes, and swear to it under oath.

23 Q And swear to it. And if you write the statement
24 out for them, then they read it; correct?

25 A Correct.

1 Q And when they read it, what do you tell them to
2 do while they're reading it?

3 A Well, I swore them -- I swear them under oath
4 and I -- and they review the statement. And if
5 everything in there is true, then they sign that it's
6 true to the best of their knowledge and belief upon
7 penalty of perjury.

8 Q Okay. And what do you tell them to do when
9 they're reading the statement and there's something in
10 there that they don't agree with or that maybe you got it
11 wrong?

12 A Exactly. Then we can change it. We can either
13 change it in the computer if it's a document in there at
14 my office, then we can change it. Or we have at times
15 even have them hand-written and corrected on there with
16 blue pen. Everyone always signs in blue pen and only if
17 they're comfortable. You know, at any time a witness is
18 giving a statement, I advise them that they have to be
19 comfortable with the words that are being chosen, and a
20 lot of times they do hand-write the statement themselves.

21 Q And let's say the technique where you write the
22 statement for them and while they're reading it and they
23 see an error. Have you been taught that they perhaps
24 correct the error, put their initials --

25 A Yes.

1 Q -- and write the date and time?

2 A Exact -- well, not the date and time. Just that
3 they're initialing it and they correct it. And it's in
4 blue pen and then they have dated and signed it where
5 it's appropriate under the notary.

6 Q And that technique was not used with Mr. Peruta;
7 right?

8 A No. We don't take formal statements from
9 complainants or witnesses in the City of Hartford cases,
10 generally speaking.

11 Q And did you have an opportunity, in fact, to
12 review a statement by Mr. Peruta that was notarized?

13 A Yes, I did.

14 Q And is that contained at Exhibit 61A? That's
15 the Citizen Complaint document that we were looking at.

16 A It's the "Description of the Incident."
17 "Respectfully." Yes.

18 Q And is there anywhere stated that you saw in the
19 notarized statement given by Mr. Peruta in 61A where he
20 says he was told to stop filming?

21 A I don't see that he specifically said that.

22 Q Okay. And did you at any point say to
23 Mr. Peruta in your meeting with him, or afterwards in a
24 follow-up phone call, "Gee, the notarized statement in the
25 Citizen Complaint Form doesn't say anything about they

1 told you to stop filming. Why did you tell me that?"

2 MS. FEOLA-GUERRIERI: Objection to form.

3 MS. HARRIS: I join.

4 A No, I didn't and -- no. This is -- the reason
5 that we generally meet with the complainant is so that we
6 can get a -- you know, more information from them.
7 That's -- you know, all the information is not always
8 contained in the complaint. We will at times definitely
9 refer back to their complaint if the information isn't
10 consistent. I didn't really necessarily find this to be
11 inconsistent because it was just something that he said,
12 and this is obviously a very, you know, well constructed
13 type document and I didn't particularly notice that he
14 didn't say in this specifically that he was told to stop
15 filming.

16 BY MS. BAIRD:

17 Q Okay. And after you had an opportunity to
18 review whatever video it was that you did review, did you
19 contact Mr. Peruta and say, "I didn't" -- "I didn't see or
20 hear any indication in the clips you gave me that the
21 police officers told you to stop filming"?

22 MS. FEOLA-GUERRIERI: Objection to form.

23 MS. HARRIS: Objection.

24 A No. Because I took his -- the statement of
25 "you're not filming the dead body" that he's not filming

1 the dead body.

2 BY MS. BAIRD:

3 Q Okay. And I know Counsel had asked you, I think
4 the words were "was there any indication that the" -- hold
5 on. I want to get this straight.

6 I'm going to ask the court reporter to go back
7 and read Chief Rovella's Counsel's question about "stop
8 filming altogether." There was a question that indicated
9 "altogether" and I need that read back.

10

11 [Requested questions and answers read back by
12 reporter.]

13

14 BY MS. BAIRD:

15 Q Did Mr. Peruta tell you at any point in your
16 conversations with him that he was told to stop filming
17 altogether?

18 A Well, he didn't say "altogether," but yes, he
19 said he was told to stop filming.

20 Q Okay. And did you take that to mean he was told
21 to stop filming a dead body?

22 A No. I took it to mean that he was told to stop
23 filming.

24 Q Okay. And so he was -- when -- in your Report
25 No. 5, page two in Exhibit 61C where the -- where you

1 state that the officer is clearly heard saying "you're not
2 filming a dead body"; correct?

3 A Yes. Correct.

4 Q And is that the phrase that you took to mean
5 you're not filming at all?

6 MS. FEOLA-GUERRIERI: Objection.

7 MS. HARRIS: Objection.

8 A It was both in my conversation with Mr. Peruta
9 and reviewing the video that I came to this conclusion.
10 And additionally, Kristin Brazalovich's report, which she
11 interviewed him as well.

12 BY MS. BAIRD:

13 Q And did you read Ms. Brazalovich's report --

14 A I did.

15 Q You did.

16 A Yes.

17 Q Prior to making your summary -- Investigative
18 Summary, Report No. 5?

19 A Most certainly.

20 Q Are you familiar with -- I know you said you
21 went to the Connecticut School of Broadcasting. Based on
22 either that training or other training or experience are
23 you familiar with how videographers or video journalists
24 take clips or video scenes at a crime scene?

25 A No.

1 Q Okay. So do you have any knowledge about how
2 long the clips -- how long news stations or other media
3 outlets prefer that the clips are?

4 A I have no knowledge of any of that type of
5 industry information.

6 Q After you -- we may have gone over this already.
7 After you drafted Report No. 3, was Mr. Peruta provided
8 any opportunity to look at it?

9 MS. FEOLA-GUERRIERI: Objection to form.

10 A No.

11 BY MS. BAIRD:

12 Q Was Mr. Peruta provided any opportunity to look
13 at Report No. 4 or Report No. 5?

14 A No.

15 MS. FEOLA-GUERRIERI: Same objection.

16 BY MS. BAIRD:

17 Q Is the City of Hartford aware that you destroy
18 notes related to your investigations on behalf of the
19 Civilian Review Board?

20 MS. FEOLA-GUERRIERI: Objection.

21 A I just don't retain notes. I've never retained
22 notes for any client, so -- I document my findings and I
23 generally do not keep my notes.

24 BY MS. BAIRD:

25 Q Is it fair to say that when you draft reports

1 similar to Reports No. 1 through 5 in Exhibit 61C, you
2 don't include everything that's in your notes? Right?

3 A It depend -- yeah, no, not always.

4 Q I had shown you a media policy. Oh, it is still
5 right there in front of you. If I could just grab it and
6 get the number. No. 27.

7 Are you aware of any media policy that has
8 rescinded Exhibit 27?

9 MS. FEOLA-GUERRIERI: Objection. She's
10 already testified that she doesn't rely on that.

11 A I've never seen this document, so I wouldn't be
12 aware of anything that rescinded or replaced it.

13 BY MS. BAIRD:

14 Q And did Corporation Counsel on behalf of Chief
15 Rovella accurately state your testimony that you do not
16 rely on any media policy of the Hartford Police
17 Department?

18 MS. FEOLA-GUERRIERI: Objection to the
19 form.

20 MS. HARRIS: Objection.

21 A I've never had a cause --

22 MS. BAIRD: Well, if we could read back
23 what Counsel said on the objection.

24 MS. FEOLA-GUERRIERI: I said "objection to
25 the form."

1 MS. BAIRD: But then there was a comment
2 afterwards.

3
4 [Requested objection read back by
5 reporter.]

6
7 MS. FEOLA-GUERRIERI: Asked and answered.

8 BY MS. BAIRD:

9 Q Okay. Is that your testimony, that you have
10 already testified that you do not rely on Exhibit 27?

11 A I've never seen Exhibit 27.

12 Q And have you ever seen any media policy
13 promulgated by the City of Hartford Police Department?

14 A I do not believe that I have.

15 Q Do you rely on any policies or procedures or
16 General Orders of the Hartford Police Department?

17 A I do.

18 Q For what purpose?

19 A For the purpose of any ongoing investigation.
20 So there's a code of conduct which we rely upon because
21 officers are often generally accused of violating the
22 code of conduct. If so, we have to specifically put in
23 our report which section of the code of conduct they're
24 accused of violating. The code of conduct also defines
25 conduct unbecoming an officer, neglect of duty. So we

1 rely on the code of conduct and any other type of policy.
2 For instance, there were accusations in one case about an
3 officer not documenting an accident by the end of the
4 course of shift duty, so I would ask for policies and
5 procedures related to that.

6 I've never had a cause in a case yet, from all
7 the years in the City of Hartford, which I've requested
8 the media policy. I have requested numerous other
9 policies and procedures with respect to any other
10 investigation I'm conducting.

11 Q What is Google Scholar? I heard you mention
12 that. I just have to ask.

13 A It's a search engine on Google that searches
14 case law.

15 Q Okay. Does it require a subscription or it's
16 just --

17 A No. You just go into Google and -- Google
18 Scholar specifically and you can click the state that
19 you're looking for, the specific case law. You can look
20 for scholarly articles or case law, and then you put in
21 the search terms -- I'm very good at searching with
22 search terms and quotation marks to sort of, you know,
23 narrow down my hits. So Google Scholar I found to be
24 really great. Of course, the cases are not Shepardized,
25 you know, when I find them or anything to that degree,

1 but I generally when I'm looking for any type of case law
2 for any reason -- and I've been asked to do it on
3 numerous occasions for other lawyers to help support
4 legal claims to do legal research, though.

5 Q And has the Civilian Review Board -- your work
6 on behalf of the Civilian Review Board, have you been
7 asked specifically to do that kind of legal research?

8 A No. I mean if we get a case in and there's --
9 you know, a legal search and seizure, to that effect. I,
10 of course, will always pull up and cite directly from
11 the -- you know, just straight from the Constitution,
12 whatever. So if it's the Fourth Amendment, illegal
13 search and seizure, so I would cite from that and -- but
14 I would not really do case law research. This is the
15 only case I've ever had in the City of Hartford where
16 I've been asked to draw, you know, a strict legal
17 conclusion.

18 Q And who asked you to draw that strict legal
19 conclusion?

20 A Well --

21 MS. FEOLA-GUERRIERI: Objection to form.

22 A When I received this case, it was very simple --
23 it came across simplistically that he was saying that his
24 First Amendment rights had been violated, and this is the
25 case law that he cited. I've never had any other

1 complainant give me case law before or cite a Monell
2 claim or any type of complex legal argument before. So
3 this is the first time that I've had to look at a case
4 and determine whether or not the case law cited supports
5 the allegations. Because I basically was being asked to
6 render, you know, judgment on that.

7 I've been asked certainly to determine if
8 someone's, you know, civil rights have been violated by
9 excessive force and all these others things and, of
10 course, I'm using the facts on that. But I've never had
11 a complainant submit case law to me before. So that's, I
12 guess, what I mean by that.

13 BY MS. BAIRD:

14 Q Okay. You had mentioned that you had training
15 in report writing --

16 A Mm-hmm.

17 Q -- or statement taking, whatever you want to
18 call it, from Mr. Senick, who was a Connecticut State
19 Trooper?

20 A He was a Connecticut State Police major.

21 Q Okay. Any other training in law enforcement
22 techniques? Formal, that you --

23 A Not --

24 Q Or on the job.

25 A Yeah, formally, but --

1 Q Okay.

2 A I mean, I'm sorry, not formally. However, yes,
3 on the job. With any -- like I said initially, I'm
4 extremely curious, and if I don't understand something
5 I'm going to research it so that I do have an
6 understanding of it.

7 Q Did either -- and is it J&G?

8 A Yes.

9 Q Do I recall that correctly? J&G or ISS send you
10 to any training seminars specific to your work?

11 A No. I have never been sent.

12 MS. BAIRD: I don't have any further
13 questions. Thank you.

14 MS. HARRIS: Two quick follow-up questions.

15

16 RE-CROSS-EXAMINATION

17

18 BY MS. HARRIS:

19 Q With regard to -- I was just going to ask about
20 the video in this case. When you receive -- well, let
21 me -- sorry. Let me rephrase that.

22 Generally speaking when a complainant provides
23 you with documentation or video, when you submit your
24 reports to the Office of Corporation Counsel do you
25 typically return the original documents and video that

1 the complainant has supplied you directly back with those
2 reports?

3 A Absolutely as a matter of practice.

4 Q Okay. So in other words, any originals you
5 would no longer have in your possession. Those would have
6 been turned over.

7 A That's correct.

8 Q Okay. And then in relation to this incident
9 where Mr. Peruta provided your colleague with a copy of an
10 F.O.I. -- was it a Freedom of Information request or a
11 complaint?

12 A It was a request.

13 Q Okay. Was he expecting your organization to
14 respond to that request?

15 A No.

16 Q I'm not sure I'm understanding what you said.

17 A No. He said that it was -- and it was addressed
18 to the City of Hartford. That he intended to
19 hand-deliver this F.O.I. request to the City of Hartford.

20 Q Okay. Do you know why Mr. Peruta felt the need
21 to give your colleague a copy of a document that he
22 didn't -- an F.O.I. request?

23 A I have absolutely no idea.

24 Q Did he intend that as some sort of threat
25 against your organization? That he was going to sue you

1 or imperil your contract with the city?

2 A He did not say that, so -- and I know that as
3 Attorney Baird mentioned, that my colleague Andy was
4 familiar with Ed and had -- the complainant, and had seen
5 him on several occasions, including with Attorney Baird
6 at some book signings and things that are of a local
7 nature.

8 So I don't know what his motive was to provide
9 my colleague a copy of this. I just know what he told my
10 colleague with respect to me and Integrated in general.
11 I know he knows that Andy Thibault works for us.

12 Q Okay. Mr. Thibault, was he at that point in
13 time in a position that is superior to yours within --

14 A No.

15 Q Okay. And did your organization provide any
16 response to that F.O.I. request to Mr. Peruta?

17 A No.

18 Q Okay. Did you have any further contact with
19 Mr. Peruta about it?

20 A No.

21 MS. HARRIS: Okay. Thanks. That's all I
22 have.

23 MS. FEOLA-GUERRIERI: No.

24 MS. BAIRD: I have some follow-up to that.

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CONTINUED REDIRECT EXAMINATION

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BY MS. BAIRD:

Q How long have you known Mr. Thibault?

A Oh, a long time.

Q Okay. Is it fair to say that he has written articles and, in fact, a couple of books about police misconduct?

A Oh, absolutely.

Q Fair to say he's known for looking into allegations of police misconduct?

A Yes.

Q Is it also fair to say he's very recognized or he's known for being a person with interest in the First Amendment?

A Oh, yes. Absolutely.

Q Okay. And you had indicated to Counsel that you submit your reports to the Office of Corporation Counsel? I may have to have it read back. I forgot what the question was.

A That's correct.

Q Yes. Was there a time when you submitted your reports to the Office of Human Relations?

A Yes. When -- yes. When I first came on to Integrated and that was -- it was directed at the Office

1 of Human Relations, and then at some point that office
2 did not exist anymore and this work was absorbed into the
3 Office of Corporation Counsel, and I was then directing
4 all of our final reports and evidence to Corporation
5 Counsel.

6 Q And you indicated to Mr. Peruta in this
7 conversation you had with him by phone when you've
8 testified it appeared he was upset about your findings,
9 that he would have to wait for it to come up before Board
10 review?

11 A Correct.

12 Q Do you know if it ever came up for Board review?

13 A To my knowledge it didn't.

14 Q Okay. And what do you know about whether it
15 came up for Board review or not?

16 A I watched the October 19th broadcast of the
17 Civilian Review Board meeting, and it was my
18 understanding that it did not come up for review because
19 it was in litigation.

20 Q Okay. And are you aware or have you been aware
21 since 2009 in your work for the Civilian Review Board that
22 cases that are in litigation don't come up for Board
23 review?

24 A Yes.

25 Q And how were you made aware of that?

1 A Well, generally speaking, if a case that we are
2 investigating and the city receives notice of a lawsuit,
3 we will be directed to cease our investigation.

4 Q Have there, in fact, been cases where you've
5 been told by the Office of Corporation Counsel to stop
6 investigating --

7 MS. FEOLA-GUERRIERI: Objection.

8 BY MS. BAIRD:

9 Q -- the case?

10 MS. FEOLA-GUERRIERI: This is going beyond
11 the last set of questions. I think we've, you
12 know, been here now for -- I think you're
13 getting into an area you could have covered
14 before.

15 MS. BAIRD: Let me see if there's anything
16 within the scope.

17 BY MS. BAIRD:

18 Q What led you to watch the Civilian Review Board
19 meeting in October?

20 A Because prior to that is when Mr. Peruta
21 approached my colleague Andy Thibault.

22 Q So you learned through Mr. Thibault that that
23 meeting may well be videotaped?

24 A Yes.

25 MS. BAIRD: Okay. No further questions.

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MS. FEOLA-GUERRIERI: Nothing further.

Thank you.

[Deposition concluded at 1:41 p.m.]

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JURAT

I, JACQUELINE MANNING-BAINER, have read the foregoing transcript of the testimony given at my deposition on March 21, 2017, and it is true and accurate to the best of my knowledge and belief as originally transcribed and/or with the changes as noted on the attached Errata Sheet.

DATE JACQUELINE MANNING-BAINER

Subscribed and sworn to before me this _____ day of _____, 2017.

Notary Public

My Commission Expires:_____

REPORTER: Patricia Tyszka
CT Lic. #0046

1 STATE OF CONNECTICUT :
 2 COUNTY OF HARTFORD : Ss: WEST HARTLAND

3
 4 I, PATRICIA TYSZKA, a Registered Merit Reporter
 5 and Notary Public duly commissioned and qualified in and
 6 for the State of Connecticut, do hereby certify
 7 that pursuant to notice there came before me on March
 8 21, 2017, the following-named person to wit: JACQUELINE
 9 MANNING-BAINER, who was by me duly sworn to testify to the
 10 truth and nothing but the truth; that she was thereupon
 11 carefully examined upon her oath and her examination
 12 reduced to writing under my supervision; that this
 13 transcript is a true record of the testimony given by the
 14 witness.

15 I further certify that I am neither attorney nor
 16 counsel for nor related to nor employed by any of the
 17 parties to the action in which this deposition is taken;
 18 and further, I am not a relative or employee of any
 19 attorney or counsel employed by the parties hereto, or
 20 financially interested in this action.

21
 22
 23 _____
 Patricia Tyszka
 LSR, RMR and Notary Public
 24 CT Lic. #0046

 DATE

25 My Commission Expires:
 May 31, 2020

<p>BY MS. BAIRD: [71] 6/7 6/21 8/24 10/14 13/10 16/4 24/2 27/6 28/14 29/7 31/10 38/3 38/14 39/1 43/16 44/14 45/24 47/3 48/13 50/2 52/4 56/1 69/3 70/1 73/14 73/21 74/7 74/12 74/21 75/10 75/20 76/3 76/12 76/18 77/8 77/24 79/15 80/23 81/5 81/14 81/20 82/5 82/10 82/18 83/2 83/10 83/13 83/19 83/24 84/5 84/9 84/14 84/20 85/6 85/22 86/3 86/20 114/1 119/15 120/1 120/12 121/11 122/10 122/15 122/23 123/12 124/7 127/12 131/1 133/7 133/16</p> <p>BY MS. FEOLA-GUERRIERI: [1] 103/5</p> <p>BY MS. HARRIS: [3] 90/10 90/16 128/16</p> <p>COURT REPORTER: [3] 13/5 15/25 52/1</p> <p>MS. BAIRD: [27] 8/23 10/3 10/8 10/12 29/3 29/6 37/18 38/11 43/11 55/20 55/23 72/11 72/16 73/3 73/9 73/12 74/3 77/4 89/18 89/25 90/3 123/21 123/25 128/11 130/23 133/14 133/24</p> <p>MS. FEOLA-GUERRIERI: [51] 8/21 9/25 10/5 23/22 27/5 28/3 28/6 28/25 29/5 31/4 31/7 37/11 37/16 37/19 38/25 43/9 44/11 45/19 46/20 49/23 55/18 55/25 68/24 69/5 72/9 72/14 73/7 73/10 73/13 74/1 77/6 77/23 86/12 90/14 103/1 113/20 119/1 119/21 121/5 122/8 122/14 122/19 123/8 123/17 123/23 124/5 126/20 130/22 133/6 133/9 133/25</p> <p>MS. HARRIS: [15] 31/5 44/10 44/12 45/21 46/19 48/10 69/1 89/24 102/24 119/2 119/22 121/6 123/19 128/13 130/20</p> <p>THE WITNESS: [14] 10/4 10/7 10/9 10/13 13/9 16/1 28/5 31/6 37/15 52/3 72/12 73/2 89/23 90/7</p>	<p>11:28 [1] 55/23 11th [2] 36/5 36/10 12 [2] 83/23 84/2 128 [1] 3/16 12:31 [1] 90/3 12:41 [1] 90/3 12th [2] 2/18 55/14 13 [3] 28/18 84/4 84/7 131 [1] 3/17 14 [1] 84/11 1475 [2] 27/3 67/18 15 [4] 1/19 2/5 84/13 84/16 16 [4] 24/5 84/19 84/22 84/23 1656 [1] 2/19 17 [2] 85/5 85/9 17th [1] 22/8 18 [2] 85/21 85/24 19 [5] 79/6 79/8 86/2 86/5 95/8 196 [1] 86/8 1994 [1] 52/21 19th [2] 12/1 132/16 1:41 [1] 134/4 1st [2] 13/25 107/13</p>	<p>3-minute-and-32-second [6] 79/18 82/24 83/10 83/17 84/17 86/1 30 [2] 62/23 63/3 31 [1] 137/25 33 [1] 60/16 330 [1] 1/23 35 [1] 35/9 3:15-CV-01209-RNC [1] 1/6</p>
<p>'94 [1] 52/21 'you're [1] 109/1</p>	<p>2</p> <p>2-196 [1] 86/8 20 [1] 100/12 2002 [2] 2/6 51/16 2004 [4] 24/10 24/22 51/17 53/8 2007 [3] 51/9 51/11 53/8 2009 [13] 12/1 20/16 26/20 41/3 50/24 53/4 64/5 64/11 65/19 66/1 70/22 87/6 132/21 2011 [2] 34/6 88/15 2012 [3] 14/14 34/6 88/15 2014 [23] 11/4 11/4 17/8 17/9 17/9 17/17 18/3 18/23 22/9 24/5 24/11 33/11 33/24 34/10 41/11 55/14 59/6 64/22 94/16 97/21 100/12 102/3 106/20 2014-1475 [1] 67/18 2015 [8] 28/5 28/24 36/5 36/10 40/7 68/4 68/8 88/21 2016 [11] 12/12 12/13 15/10 15/16 15/19 15/22 16/9 16/10 19/16 20/16 112/8 2017 [6] 1/9 1/19 135/6 135/15 136/21 137/8 2020 [1] 137/25 203 [1] 1/24 20th [4] 59/6 59/22 60/1 97/21 21 [1] 135/6 21, 2017 [1] 137/8 2190 [1] 1/24 21st [5] 59/16 60/6 60/15 60/19 102/3 22 [4] 1/9 1/19 30/21 32/17 22nd [1] 34/23 24th [12] 30/24 33/9 33/23 34/10 34/23 35/4 35/7 35/15 72/6 94/16 98/21 106/20 26th [4] 68/4 68/8 68/12 88/20 27 [7] 43/5 43/8 43/20 123/6 123/8 124/10 124/11 271-2190 [1] 1/24 27th [2] 28/5 28/24 2:12:37 [1] 60/20 2:15 [1] 60/16</p>	<p>4</p> <p>4-minute-and-10-second [1] 85/9 40 [4] 6/2 11/18 35/9 106/15 42 [1] 10/22</p>
<p>-u-f-f-e-y [1] 15/14</p>	<p>2</p> <p>21 [1] 135/6 21, 2017 [1] 137/8 2190 [1] 1/24 21st [5] 59/16 60/6 60/15 60/19 102/3 22 [4] 1/9 1/19 30/21 32/17 22nd [1] 34/23 24th [12] 30/24 33/9 33/23 34/10 34/23 35/4 35/7 35/15 72/6 94/16 98/21 106/20 26th [4] 68/4 68/8 68/12 88/20 27 [7] 43/5 43/8 43/20 123/6 123/8 124/10 124/11 271-2190 [1] 1/24 27th [2] 28/5 28/24 2:12:37 [1] 60/20 2:15 [1] 60/16</p>	<p>5</p> <p>550 [1] 2/12 57 [2] 86/7 86/8</p>
<p>0</p> <p>0046 [4] 1/22 135/23 136/25 137/24 06103 [2] 2/12 2/18 06106 [1] 6/3 06410 [1] 1/24 06791-2002 [1] 2/6</p>	<p>3</p> <p>3-minute [1] 94/24</p>	<p>6</p> <p>605-9340 [1] 2/6 61 [3] 29/18 72/20 73/17 61A [27] 23/4 23/13 23/16 24/5 24/17 24/21 24/25 25/16 25/21 25/25 27/2 28/21 28/23 29/11 29/19 29/20 31/21 31/22 49/6 50/9 64/18 64/20 75/14 77/19 78/18 118/14 118/19 61B [8] 67/20 67/21 67/23 68/3 68/8 68/18 88/17 88/25 61C [35] 21/1 21/11 21/12 21/16 22/15 23/6 23/10 25/3 25/8 27/20 28/17 29/24 32/22 38/17 39/12 40/12 40/25 41/14 48/21 56/4 59/15 60/5 60/15 62/15 65/6 90/19 95/14 97/22 100/13 102/2 103/8 106/11 115/20 120/25 123/1 61D [2] 63/21 66/8 61E [3] 66/8 66/10 66/16 61F [4] 67/3 67/5 67/8 67/16 61G [3] 35/23 36/4 36/15 61H [51] 72/8 72/22 72/22 72/24 73/1 73/7 73/8 73/20 73/21 74/12 74/15 74/21 75/10 75/20 76/3 76/12 76/18 77/4 77/21 77/23 78/2 78/2 78/4 78/6 79/15 79/18 80/14 80/15 80/20 80/22 81/5 81/14 81/19 82/4 82/5 82/10 82/12 82/18 82/20 83/2 83/8 83/13 83/19 83/24 84/5 84/9 84/14 84/20 85/6 85/22 86/3 61I [1] 72/8 62 [6] 4/5 6/21 7/2 7/20 21/3 21/9</p>
<p>1</p> <p>10 [4] 38/18 39/4 83/12 83/15 10-minute [1] 89/21 100 [4] 2/18 21/6 21/14 25/23 103 [1] 3/14 1099 [2] 14/19 14/23 10:03 [1] 1/19 10:48 [1] 38/14 10:57 [1] 38/14 11 [7] 27/20 30/17 31/2 83/18 83/21 90/25 104/3 114 [1] 3/15 11:25 [1] 55/23</p>	<p>3</p> <p>3-minute [1] 94/24</p>	<p>7</p> <p>757-9709 [1] 2/12</p>
<p>1</p>	<p>3</p>	<p>8</p> <p>860 [3] 2/6 2/12 2/19 899-1656 [1] 2/19</p>
<p>1</p>	<p>3</p>	<p>9</p> <p>9-1-1 [3] 69/18 71/15 71/17 9/16/2004 [2] 24/10 24/22 9/22 [2] 30/21 32/17 90 [1] 3/13 9340 [1] 2/6 9709 [1] 2/12 978 [1] 78/21 9:24 a.m [1] 102/3</p>
<p>1</p>	<p>3</p>	<p>A</p> <p>a.m [6] 1/19 38/14 38/14 55/23 55/23</p>

<p>A</p> <p>a.m... [1] 102/3</p> <p>ability [2] 20/25 56/9</p> <p>able [5] 9/8 33/4 47/13 48/15 55/11</p> <p>about [60] 9/9 17/16 18/9 19/2 19/5 19/12 22/6 25/9 25/11 31/10 34/16 35/6 44/8 46/17 47/6 47/14 50/24 51/18 53/23 54/6 55/5 56/8 56/20 56/22 58/15 62/3 62/15 65/4 70/9 79/7 85/3 85/12 85/24 86/5 89/9 95/9 96/20 96/23 99/4 99/22 105/25 108/13 108/21 109/8 111/11 112/2 113/17 114/23 114/25 115/3 115/7 118/25 120/7 122/1 125/2 128/19 130/19 131/7 132/8 132/14</p> <p>above [2] 35/16 78/21</p> <p>absolutely [14] 10/14 11/24 13/10 15/18 23/17 25/6 29/13 61/5 100/18 116/19 129/3 129/23 131/9 131/16</p> <p>absorbed [1] 132/2</p> <p>Academy [2] 87/19 88/7</p> <p>accept [4] 7/4 45/3 45/18 45/24</p> <p>accepting [1] 49/18</p> <p>access [7] 61/2 61/2 68/23 69/24 71/23 97/3 97/6</p> <p>accident [1] 125/3</p> <p>accompanied [1] 7/6</p> <p>accurate [3] 67/13 135/6 136/4</p> <p>accurately [2] 8/10 123/15</p> <p>accusations [1] 125/2</p> <p>accused [4] 27/21 63/14 124/21 124/24</p> <p>across [1] 126/23</p> <p>Act [2] 89/18 112/21</p> <p>acting [1] 48/6</p> <p>action [3] 1/6 137/17 137/20</p> <p>actions [1] 58/1</p> <p>active [1] 61/8</p> <p>activity [1] 42/1</p> <p>actual [4] 28/11 37/25 50/1 72/2</p> <p>actually [13] 6/18 20/22 37/14 53/9 59/8 65/1 87/23 92/6 99/12 104/23 105/16 106/21 113/4</p> <p>add [4] 9/6 17/4 44/24 59/12</p> <p>additional [3] 24/12 30/19 97/12</p> <p>additionally [2] 35/16 121/10</p> <p>additions [1] 136/3</p> <p>address [1] 11/19</p> <p>addressed [1] 129/17</p> <p>addressee [1] 65/7</p> <p>addresses [1] 38/23</p> <p>adequacy [1] 5/10</p> <p>adjudicated [2] 54/3 61/13</p> <p>administrative [3] 16/12 19/7 40/3</p> <p>administrator [4] 16/13 19/3 22/25 28/20</p> <p>admitted [1] 104/23</p> <p>advise [3] 26/21 34/20 117/18</p> <p>advised [3] 9/22 98/4 115/5</p> <p>Affairs [16] 26/4 26/10 26/22 27/3 27/8 27/15 41/2 63/6 67/25 70/24 71/9 71/20 79/4 89/4 89/9 89/14</p> <p>affidavits [1] 115/18</p> <p>affiliated [2] 26/24 107/22</p> <p>after [18] 6/3 34/25 52/11 52/22 57/14 62/22 79/11 95/8 98/23 98/25 99/21 100/9 110/24 110/24 116/20 119/17 122/6 122/7</p> <p>afterwards [3] 99/20 118/23 124/2</p> <p>again [14] 20/22 57/3 75/25 76/7 82/1 83/22 91/23 95/24 98/20 99/24 100/11</p>	<p>109/12 109/16 110/8</p> <p>against [8] 87/25 96/11 99/3 104/13 104/16 111/10 112/1 129/25</p> <p>agencies [3] 18/14 19/15 19/17</p> <p>agency [4] 11/13 11/14 64/21 115/14</p> <p>agenda [1] 87/5</p> <p>aggressive [1] 111/20</p> <p>ago [1] 58/21</p> <p>agree [4] 20/19 62/2 115/19 117/10</p> <p>agreed [3] 5/10 5/12 5/16</p> <p>ahead [1] 48/12</p> <p>air [1] 14/5</p> <p>aired [3] 13/22 13/24 14/6</p> <p>AL [1] 1/10</p> <p>Alaina [2] 16/9 17/16</p> <p>Alan [2] 12/23 66/10</p> <p>aligning [1] 78/16</p> <p>all [61] 10/22 12/6 14/5 14/6 20/15 20/17 20/21 22/5 27/4 27/9 34/9 35/20 35/24 36/15 37/18 38/10 38/22 46/7 52/17 61/20 65/6 76/2 81/10 85/8 91/25 92/9 92/24 93/14 93/14 94/9 94/14 95/3 95/7 95/13 95/24 96/14 97/16 97/25 98/3 98/7 98/8 100/14 100/20 101/1 101/19 102/7 102/11 104/2 105/7 105/24 106/11 109/21 110/12 112/13 113/20 119/7 121/5 125/6 127/9 130/21 132/4</p> <p>Allegation [1] 29/23</p> <p>allegations [2] 127/5 131/11</p> <p>allowed [1] 47/3</p> <p>almost [1] 12/2</p> <p>along [1] 29/14</p> <p>already [11] 28/7 34/10 35/17 73/9 101/6 108/1 113/14 113/18 122/6 123/10 124/10</p> <p>also [20] 15/16 17/2 28/4 40/19 45/10 51/5 61/16 71/11 73/4 83/9 83/16 88/7 92/15 98/2 100/14 101/22 110/23 112/24 124/24 131/13</p> <p>although [2] 42/10 59/1</p> <p>altogether [6] 105/22 109/13 120/8 120/9 120/17 120/18</p> <p>always [12] 24/1 26/3 26/21 39/21 52/18 53/21 61/14 64/24 117/16 119/7 123/3 126/10</p> <p>am [9] 15/5 30/6 38/20 53/20 79/9 93/6 115/18 137/15 137/18</p> <p>Amanda [1] 16/11</p> <p>Amendment [14] 44/3 44/5 56/8 79/10 92/4 98/1 98/9 105/4 106/18 107/13 110/14 126/12 126/24 131/15</p> <p>AMERICAN [3] 1/6 107/20 107/23</p> <p>Among [1] 18/12</p> <p>ample [1] 67/22</p> <p>analogous [1] 106/9</p> <p>and further [1] 137/18</p> <p>and if [1] 80/25</p> <p>and/or with [1] 135/8</p> <p>Andrews [1] 1/23</p> <p>Andy [7] 112/10 113/8 113/9 113/10 130/3 130/11 133/21</p> <p>Andy's [1] 112/24</p> <p>Anlinda [10] 26/14 40/12 40/19 40/20 40/21 60/2 62/16 71/2 71/8 102/4</p> <p>another [8] 23/3 43/14 57/18 63/20 74/14 74/19 96/3 96/7</p> <p>answer [8] 13/8 23/24 31/9 41/7 44/13 66/24 69/3 79/5</p> <p>answered [2] 111/3 124/7</p>	<p>answers [2] 5/6 120/11</p> <p>antagonistic [1] 111/20</p> <p>anticipate [1] 8/16</p> <p>anxious [1] 32/16</p> <p>any [115] 8/7 8/10 8/20 9/9 15/3 18/13 19/6 19/11 19/15 20/1 20/11 22/13 24/8 33/13 35/24 36/15 36/19 39/5 39/9 41/3 41/4 41/9 42/23 42/24 43/22 44/4 44/8 46/16 47/6 48/5 55/4 58/11 61/2 62/13 67/16 67/23 69/14 70/13 75/7 80/6 80/9 81/22 82/13 85/2 85/8 87/7 87/15 88/8 88/8 89/3 89/16 91/20 93/6 93/23 93/24 94/2 94/5 94/21 95/9 95/25 96/5 96/11 96/15 96/19 96/22 97/3 97/8 97/11 97/16 99/22 102/25 104/16 105/3 105/12 105/14 110/6 111/16 112/7 113/13 113/14 113/17 114/23 115/10 116/6 116/13 117/17 118/22 119/20 120/4 120/15 122/1 122/4 122/8 122/12 122/22 123/7 123/16 124/12 124/15 124/19 125/1 125/9 126/1 126/2 126/25 127/2 127/21 128/3 128/10 128/12 129/4 130/15 130/18 137/16 137/18</p> <p>anybody [4] 14/7 35/10 87/1 92/9</p> <p>anymore [2] 28/3 132/2</p> <p>anyone [8] 14/24 16/6 16/23 29/10 54/17 65/19 66/2 70/23</p> <p>anything [16] 9/6 9/7 10/11 41/12 43/15 61/13 69/13 69/20 70/8 85/24 86/5 111/23 118/25 123/12 125/25 133/15</p> <p>anyway [1] 69/3</p> <p>anywhere [1] 118/18</p> <p>apologize [2] 32/9 92/12</p> <p>apparently [2] 40/13 113/8</p> <p>appear [3] 7/3 33/10 82/13</p> <p>appeared [3] 93/13 132/8 136/21</p> <p>appears [7] 23/5 27/25 32/22 34/22 60/18 60/21 73/25</p> <p>applicable [2] 5/8 39/8</p> <p>appointed [1] 20/2</p> <p>approached [2] 112/9 133/21</p> <p>appropriate [3] 42/18 58/1 118/5</p> <p>approximately [6] 12/1 20/14 94/16 94/24 95/8 98/17</p> <p>April [2] 28/5 28/24</p> <p>April 27th [2] 28/5 28/24</p> <p>are [63] 5/8 7/6 8/10 8/22 11/10 14/18 14/23 19/22 20/8 21/13 22/13 23/15 26/24 30/16 37/18 37/21 37/23 40/11 43/10 49/10 52/25 55/16 57/13 58/16 58/19 58/24 66/18 67/3 67/7 67/12 69/22 73/24 78/11 78/16 78/21 87/4 89/5 89/18 90/21 93/17 93/21 102/2 102/8 103/8 104/9 104/10 108/14 114/22 114/22 115/25 116/13 117/19 121/20 121/22 122/3 123/7 124/21 125/24 130/6 132/20 132/22 133/1 136/3</p> <p>area [2] 78/21 133/13</p> <p>areas [1] 57/4</p> <p>aren't [2] 8/10 49/10</p> <p>argument [2] 85/11 127/2</p> <p>around [5] 39/16 55/18 71/9 95/18 108/20</p> <p>arrest [7] 49/25 50/13 50/16 69/12 92/18 109/23 110/4</p> <p>arrested [2] 61/23 70/15</p> <p>arrests [1] 69/17</p> <p>article [1] 36/4</p>
--	---	--

A
 articles [2] 125/20 131/7
 as [106] 3/4 5/8 5/8 6/5 6/12 7/20
 10/19 10/23 12/20 14/19 14/20 14/23
 15/9 17/4 21/3 21/16 21/23 23/3 23/19
 25/4 25/4 26/16 26/16 26/16 27/1
 27/13 28/1 28/8 28/22 30/3 31/2 32/1
 32/6 32/6 32/20 34/22 36/23 40/9
 40/15 40/21 40/24 41/15 42/19 42/23
 43/7 45/19 46/14 48/1 48/6 48/8 50/14
 50/15 50/19 51/3 51/4 51/6 51/6 51/10
 51/18 53/11 53/20 53/25 54/7 54/11
 54/24 56/17 56/24 57/18 57/18 62/8
 65/7 65/20 70/4 70/6 72/20 72/22 73/6
 74/7 74/19 74/23 75/15 75/22 76/5
 76/20 77/12 77/21 78/6 78/17 80/4
 80/5 84/3 84/8 84/12 88/7 91/15 96/23
 97/11 104/9 108/6 116/1 121/11 129/3
 129/24 130/2 135/7 135/8
 aside [1] 113/14
 ask [32] 8/13 13/6 13/16 35/24 38/24
 41/20 43/18 49/6 53/12 60/6 62/10
 62/20 63/3 63/22 68/17 69/9 69/12
 69/13 70/7 70/9 70/10 70/13 70/17
 73/19 79/11 89/5 89/12 97/5 120/6
 125/4 125/12 128/19
 asked [24] 5/6 18/4 21/3 21/4 33/5
 41/12 62/9 62/25 63/2 69/15 69/16
 69/18 70/16 70/19 71/2 97/2 120/3
 124/7 126/2 126/7 126/16 126/18
 127/5 127/7
 asking [10] 27/16 31/10 43/10 43/12
 59/22 60/2 102/12 103/17 109/3
 112/13
 assign [1] 19/21
 assigned [21] 19/21 20/2 22/23 29/12
 29/25 30/7 30/9 32/14 32/15 32/22
 41/14 42/6 48/22 51/24 62/23 63/2
 64/12 70/23 87/5 89/10 110/12
 assigning [1] 64/24
 assignments [1] 18/13
 assigns [1] 26/2
 assistant [1] 40/4
 assisted [1] 62/7
 Associate [2] 1/19 2/5
 associated [4] 26/20 69/17 80/7 80/10
 association [1] 69/13
 assume [2] 25/4 97/6
 att.net [1] 1/25
 attached [3] 41/6 72/21 135/9
 attempt [4] 13/18 13/20 61/22 101/22
 attempting [1] 81/23
 attempts [1] 62/15
 attended [3] 87/7 87/9 101/12
 attending [1] 87/13
 attention [2] 16/18 64/17
 attitude [2] 50/15 57/5
 attorney [10] 76/25 80/23 91/14 97/1
 101/9 113/18 130/3 130/5 137/15
 137/19
 attorney or [1] 137/19
 attorneys [3] 5/3 19/12 19/22
 attributed [1] 104/9
 audio [5] 7/22 8/3 33/13 82/15 96/9
 August [2] 36/5 36/10
 August 11th [2] 36/5 36/10
 authored [1] 91/23
 authority [1] 5/13
 auto [1] 39/22
 auto-correct [1] 39/22

available [1] 68/20
 aware [9] 8/5 8/6 114/18 122/17 123/7
 123/12 132/20 132/20 132/25
 away [2] 13/19 37/9
B
 B-r-a-z [1] 15/25
 B-r-a-z-a-v-i-c-h [1] 16/4
 back [31] 14/1 15/2 16/10 38/17 40/12
 42/11 49/6 50/6 55/25 73/1 76/25
 77/10 85/1 92/17 93/14 93/18 93/21
 93/22 94/13 94/22 99/5 102/2 112/8
 119/9 120/6 120/9 120/11 123/22
 124/4 129/1 131/19
 background [2] 16/13 19/8
 badge [4] 39/16 40/10 95/18 108/20
 BAINER [22] 1/15 4/3 6/1 6/10 10/16
 10/20 11/1 11/3 11/7 73/3 73/4 73/16
 79/17 90/13 101/9 103/3 135/4 135/12
 136/3 136/18 136/21 137/9
 Baird [13] 1/18 2/5 2/7 3/12 3/15 3/17
 6/12 76/25 80/23 97/2 113/18 130/3
 130/5
 based [4] 45/4 54/21 116/17 121/21
 basically [14] 10/22 12/14 14/20 17/8
 22/4 46/10 47/2 54/14 57/16 101/24
 112/13 112/24 115/17 127/5
 basis [3] 58/9 69/25 86/20
 be [54] 7/21 9/2 9/3 9/8 11/19 16/9
 16/22 17/14 18/17 21/25 22/11 22/18
 25/10 26/22 26/23 30/15 34/6 34/21
 36/3 37/11 37/21 47/16 48/5 48/8
 48/16 49/23 52/9 54/7 54/18 56/11
 56/22 56/23 65/1 70/12 71/18 72/8
 73/25 87/5 87/14 89/21 89/23 94/11
 97/1 98/1 98/9 104/13 110/21 111/21
 117/18 119/10 123/11 125/23 133/3
 133/23
 beat [1] 55/6
 became [2] 26/19 87/6
 because [44] 8/8 12/16 19/14 26/2
 30/24 36/13 37/11 39/8 40/14 42/6
 43/13 44/1 45/8 46/22 46/24 49/23
 50/15 52/18 54/9 55/6 55/18 57/1
 59/25 61/22 62/10 63/12 69/22 70/7
 70/19 75/1 76/7 78/15 79/1 84/25
 95/20 99/1 109/22 110/13 119/11
 119/24 124/20 127/5 132/18 133/20
 Becoming [1] 57/5
 been [67] 6/4 6/13 6/15 6/16 7/2 7/14
 7/18 10/21 11/22 11/25 13/2 15/6
 17/22 17/22 18/7 24/2 24/17 26/7
 26/19 28/19 29/18 30/9 30/14 31/17
 38/24 42/12 43/7 44/4 47/8 51/17
 53/24 59/20 60/2 61/11 61/13 61/14
 61/16 62/3 62/17 62/24 69/10 70/15
 75/16 75/22 75/24 76/6 79/3 87/12
 89/7 89/10 90/15 91/1 91/18 97/12
 117/23 126/2 126/6 126/16 126/24
 127/7 127/8 128/11 129/6 132/20
 133/4 133/5 133/12
 before [30] 1/17 5/14 6/13 7/15 8/20
 13/8 17/23 26/4 34/17 35/25 43/8
 43/12 43/16 50/24 63/22 67/4 68/5
 68/9 68/18 69/15 80/11 93/23 127/1
 127/2 127/11 132/9 133/14 135/14
 136/23 137/7
 began [1] 64/11
 begin [1] 8/20
 beginning [1] 21/2

behalf [5] 20/11 64/6 122/18 123/14
 126/6
 behavior [1] 111/21
 behind [3] 108/9 108/23 109/5
 being [11] 30/23 46/23 61/18 63/13
 74/19 74/23 85/11 114/25 117/19
 127/5 131/14
 belief [3] 117/6 135/7 136/4
 believe [27] 11/4 17/10 17/13 18/5
 18/22 18/23 25/20 26/13 30/23 34/5
 43/9 43/25 47/7 47/7 57/19 59/1 80/12
 82/22 83/9 83/16 89/20 94/7 94/18
 98/20 99/17 102/24 124/14
 believed [1] 87/22
 besides [3] 15/3 80/10 80/10
 best [9] 20/25 56/9 56/13 67/11 71/25
 93/8 117/6 135/7 136/4
 better [1] 70/11
 between [4] 5/12 17/8 53/8 95/10
 beyond [3] 35/16 52/6 133/10
 billing [1] 112/14
 bills [1] 112/22
 blame [3] 56/25 95/19 104/24
 blip [1] 83/6
 block [1] 46/18
 blocked [1] 45/14
 blow [2] 74/2 87/25
 blue [3] 117/16 117/16 118/4
 board [34] 20/9 20/12 22/19 24/10
 34/17 42/17 50/2 51/20 51/21 64/7
 65/21 68/24 86/12 86/16 86/17 87/4
 87/7 87/13 87/14 87/16 87/22 88/13
 111/12 112/3 122/19 126/5 126/6
 132/9 132/12 132/15 132/17 132/21
 132/22 133/18
 bodies [1] 55/5
 body [28] 44/10 44/22 45/9 45/17 46/9
 46/19 46/24 47/1 47/3 47/6 47/8 47/14
 48/2 48/7 54/5 63/8 93/9 93/24 105/18
 105/19 105/20 110/9 110/9 110/10
 119/25 120/1 120/21 121/2
 body.' [1] 109/2
 book [1] 130/6
 books [1] 131/7
 Borges [4] 65/8 65/9 65/11 65/13
 both [8] 13/9 32/4 32/5 34/12 66/9 88/4
 88/6 121/8
 bottom [4] 47/21 47/23 47/24 95/15
 box [2] 25/13 50/16
 brain [1] 81/11
 BRANDON [1] 1/9
 Braz [1] 29/25
 Brazalovich [16] 15/22 17/20 17/21
 18/9 18/20 30/1 30/2 30/7 30/14 31/13
 41/15 91/3 91/4 91/5 103/15 104/1
 Brazalovich's [3] 42/4 121/10 121/13
 break [6] 8/13 8/13 9/22 38/11 55/20
 89/21
 BRIAN [1] 1/10
 bring [4] 8/8 16/18 21/3 100/25
 Bristol [5] 51/6 51/8 51/23 52/22 55/3
 broadcast [2] 52/9 132/16
 Broadcasting [4] 52/8 52/12 52/20
 121/21
 Brooks [3] 71/1 71/2 71/4
 brought [3] 13/16 72/18 73/7
 building [1] 97/18
 bullet [1] 90/25
 Burlington [2] 1/19 2/5
 business [1] 103/18

<p>C</p> <p>C-a-r-r-i-e [1] 15/13</p> <p>C-a-r-y [1] 15/12</p> <p>CADD [1] 69/18</p> <p>call [12] 11/6 11/22 40/16 60/24 98/20 99/9 100/2 100/8 111/15 111/24 118/24 127/18</p> <p>called [12] 9/7 13/17 14/8 14/9 35/1 98/23 110/25 111/4 112/17 112/18 113/9 115/4</p> <p>calling [1] 98/25</p> <p>calls [2] 69/18 71/15</p> <p>came [22] 12/7 20/16 20/19 20/24 22/18 34/5 34/17 34/25 41/2 86/17 87/21 92/2 106/15 111/12 112/3 113/11 121/9 126/23 131/24 132/12 132/15 137/7</p> <p>camera [5] 8/2 109/23 110/4 110/7 110/11</p> <p>cameras [1] 55/10</p> <p>can [44] 6/24 9/13 11/22 13/8 16/18 17/4 19/18 23/7 23/24 25/2 44/13 46/6 48/8 55/19 56/13 57/15 57/18 57/20 57/25 57/25 58/5 58/6 63/3 68/22 69/6 69/13 69/21 72/8 74/2 76/25 78/3 102/7 107/7 111/2 113/10 115/18 116/14 116/17 117/12 117/12 117/14 119/6 125/18 125/19</p> <p>can't [10] 16/14 35/8 38/6 69/8 71/15 78/14 79/5 85/17 107/3 111/13</p> <p>cannot [2] 69/21 69/21</p> <p>capacities [1] 37/24</p> <p>capacity [2] 18/8 29/5</p> <p>capital [1] 15/14</p> <p>captioning [1] 94/25</p> <p>captured [4] 93/7 95/10 96/6 96/9</p> <p>carefully [1] 137/11</p> <p>Carrie [5] 15/11 16/7 17/7 17/19 18/2</p> <p>Carrie-Jo [4] 15/11 16/7 17/7 18/2</p> <p>case [76] 11/20 18/19 21/6 21/14 22/3 22/5 25/7 26/3 26/4 27/2 27/11 27/15 28/8 29/14 34/7 35/18 37/1 37/3 37/25 38/1 38/3 38/9 38/25 39/6 42/20 42/23 43/1 43/2 43/14 43/19 43/24 50/5 54/3 54/4 55/1 56/10 62/11 62/20 63/3 69/7 69/8 69/25 69/25 70/4 74/7 74/17 74/19 80/7 87/14 87/20 88/12 91/17 92/3 98/22 101/25 102/23 106/17 106/22 125/2 125/6 125/14 125/19 125/20 126/1 126/8 126/14 126/15 126/22 126/25 127/1 127/3 127/4 127/11 128/20 133/1 133/9</p> <p>case-by-case [1] 69/25</p> <p>cases [29] 12/20 18/20 18/21 19/21 20/3 24/12 24/18 35/18 35/20 35/21 36/25 37/15 37/23 38/7 38/8 42/19 61/12 61/20 63/15 64/25 66/3 72/16 74/6 74/10 106/8 118/9 125/24 132/22 133/4</p> <p>cases that [1] 24/18</p> <p>catch [2] 13/21 27/17</p> <p>categories [1] 58/15</p> <p>Caucasian [1] 108/19</p> <p>cause [2] 123/21 125/6</p> <p>caused [1] 97/13</p> <p>CBS [2] 13/17 13/23</p> <p>CC2014 [1] 25/14</p> <p>CD [6] 71/23 72/21 73/1 81/9 93/3 96/15</p> <p>cease [1] 133/3</p>	<p>cell [1] 55/11</p> <p>CEO [3] 12/22 12/23 13/2</p> <p>certain [1] 16/22</p> <p>certainly [4] 85/19 115/21 121/19 127/7</p> <p>certify [3] 136/3 137/6 137/15</p> <p>challenging [1] 43/15</p> <p>chance [2] 9/4 55/20</p> <p>change [8] 12/13 20/20 32/25 59/25 71/10 117/12 117/13 117/14</p> <p>changed [6] 11/3 11/5 23/22 42/8 42/9 64/14</p> <p>changes [1] 135/8</p> <p>charge [8] 26/10 39/15 40/8 57/2 57/17 71/14 95/17 105/2</p> <p>charged [1] 61/18</p> <p>charges [2] 49/19 67/13</p> <p>check [1] 50/17</p> <p>checks [2] 16/13 19/8</p> <p>Cheshire [1] 1/24</p> <p>chief [8] 19/19 29/3 68/14 100/23 100/24 104/19 120/7 123/14</p> <p>child [1] 52/15</p> <p>choosing [1] 10/2</p> <p>chose [2] 10/23 110/14</p> <p>chosen [2] 7/12 117/19</p> <p>Christine [2] 18/9 91/1</p> <p>circle [1] 99/5</p> <p>circumstances [1] 56/12</p> <p>cite [5] 38/1 38/7 126/10 126/13 127/1</p> <p>cited [5] 74/7 74/19 101/25 126/25 127/4</p> <p>citing [1] 76/10</p> <p>Citizen [17] 25/1 25/20 29/10 32/8 49/9 49/12 49/20 75/13 77/11 77/21 78/5 78/7 78/10 78/19 78/24 118/15 118/25</p> <p>city [37] 2/11 18/20 22/5 22/19 23/19 24/9 26/2 28/22 35/17 36/23 58/20 58/25 64/2 64/8 65/19 66/2 78/8 86/22 87/1 88/20 89/13 99/2 104/21 111/9 112/12 112/14 112/22 113/1 118/9 122/17 124/13 125/7 126/15 129/18 129/19 130/1 133/2</p> <p>city's [1] 22/7</p> <p>civil [6] 1/6 1/18 49/21 57/8 105/3 127/8</p> <p>civilian [27] 20/8 20/12 22/19 24/10 32/7 34/17 42/17 50/1 50/8 64/7 65/21 68/24 86/11 86/16 87/3 87/7 87/13 87/14 87/16 87/22 88/13 122/19 126/5 126/6 132/17 132/21 133/18</p> <p>claim [9] 37/4 44/5 76/10 76/10 92/4 94/5 104/16 106/18 127/2</p> <p>claiming [1] 44/4</p> <p>claims [3] 98/5 109/22 126/4</p> <p>clarification [2] 11/6 87/2</p> <p>clarify [9] 9/6 10/2 10/12 24/4 28/16 29/1 29/7 37/13 40/22</p> <p>clear [5] 44/23 98/2 99/8 100/14 109/2</p> <p>clearly [3] 105/16 108/19 121/1</p> <p>click [1] 125/18</p> <p>client [2] 34/7 122/22</p> <p>clients [2] 10/23 12/8</p> <p>clip [41] 79/9 80/19 80/25 81/1 81/4 81/7 81/13 81/16 81/18 82/4 82/9 82/12 82/17 82/20 82/22 83/1 83/4 83/7 83/10 83/12 83/15 83/18 83/21 83/23 84/2 84/4 84/7 84/11 84/13 84/16 84/19 84/22 84/23 85/5 85/9 85/14 85/21 85/24 86/2 86/5 94/13</p> <p>Clip 1 [2] 80/25 81/1</p>	<p>Clip 10 [2] 83/12 83/15</p> <p>Clip 11 [2] 83/18 83/21</p> <p>Clip 12 [2] 83/23 84/2</p> <p>Clip 13 [2] 84/4 84/7</p> <p>Clip 14 [1] 84/11</p> <p>Clip 15 [2] 84/13 84/16</p> <p>Clip 16 [3] 84/19 84/22 84/23</p> <p>Clip 18 [2] 85/21 85/24</p> <p>Clip 19 [2] 86/2 86/5</p> <p>Clip 2 [2] 81/4 81/7</p> <p>Clip 3 [2] 81/13 81/16</p> <p>Clip 4 [1] 81/18</p> <p>Clip 5 [1] 82/4</p> <p>Clip 6 [2] 82/9 82/12</p> <p>Clip 7 [2] 82/17 82/20</p> <p>Clip 8 [2] 83/1 83/4</p> <p>Clip 9 [1] 83/7</p> <p>clips [12] 79/6 79/8 80/15 93/3 95/7 95/8 95/10 96/23 119/20 121/24 122/2 122/3</p> <p>closely [1] 17/13</p> <p>closer [1] 73/23</p> <p>clothes [1] 54/5</p> <p>co [1] 19/21</p> <p>co-defendants [1] 19/21</p> <p>COATES [4] 1/9 71/10 102/19 102/23</p> <p>code [6] 78/21 124/20 124/22 124/23 124/24 125/1</p> <p>collaborate [2] 27/3 27/5</p> <p>colleague [8] 112/17 112/24 129/9 129/21 130/3 130/9 130/10 133/21</p> <p>colleague's [2] 112/20 112/25</p> <p>colleagues [1] 112/9</p> <p>College [1] 88/10</p> <p>Columbia [1] 53/1</p> <p>come [8] 54/12 66/20 112/16 112/19 113/10 132/9 132/18 132/22</p> <p>comfortable [2] 117/17 117/19</p> <p>coming [2] 34/14 103/23</p> <p>commands [1] 110/17</p> <p>commencing [1] 1/19</p> <p>comment [1] 124/1</p> <p>comments [1] 9/9</p> <p>Commission [3] 135/20 136/24 137/25</p> <p>commissioned [1] 137/5</p> <p>Commissioner [1] 5/14</p> <p>communicate [2] 65/13 102/22</p> <p>communicated [8] 65/16 70/25 71/5 71/7 71/10 71/12 71/19 102/19</p> <p>communication [3] 112/5 112/6 112/7</p> <p>communications [6] 14/20 71/15 111/22 113/13 113/15 113/17</p> <p>Community [1] 88/10</p> <p>company [3] 14/22 28/3 86/17</p> <p>compiled [1] 94/25</p> <p>complainant [57] 20/24 30/13 31/16 31/18 32/3 32/6 32/16 32/19 35/11 36/21 37/1 39/5 39/18 40/9 40/18 44/24 45/5 46/10 47/2 47/18 48/2 48/7 48/9 49/25 50/14 50/16 58/23 61/1 61/18 74/7 74/20 74/24 78/5 89/8 89/15 90/24 92/2 92/15 95/17 97/24 98/2 98/4 98/8 100/13 103/16 106/15 108/10 108/25 109/17 109/21 110/13 119/5 127/1 127/11 128/22 129/1 130/4</p> <p>complainant's [4] 45/18 46/4 50/13 57/17</p> <p>complainants [3] 26/22 115/11 118/9</p> <p>complaining [5] 70/9 89/8 105/25</p>
--	---	---

<p>C</p> <p>complaining... [2] 108/13 109/8</p> <p>complaint [75] 22/20 23/11 23/12 24/8 24/15 25/1 25/6 25/9 25/11 25/20 25/24 28/11 29/11 29/15 29/22 31/14 32/7 32/8 35/14 35/17 37/24 38/1 39/14 39/19 41/11 44/1 49/2 49/7 49/8 49/9 49/13 49/20 50/2 50/6 50/17 56/11 56/20 56/22 57/4 57/15 57/21 57/24 58/3 58/10 58/24 60/8 65/14 70/5 71/22 75/13 75/17 75/23 76/6 76/21 77/11 77/21 78/8 78/9 78/10 78/19 78/24 82/21 95/16 96/11 99/23 102/9 104/13 105/7 105/8 109/12 118/15 118/25 119/8 119/9 129/11</p> <p>complaints [4] 23/20 49/22 50/7 86/11</p> <p>complete [2] 32/2 62/21</p> <p>completed [1] 98/25</p> <p>completely [3] 13/7 58/1 58/5</p> <p>complex [1] 127/2</p> <p>computer [1] 117/13</p> <p>concern [1] 54/19</p> <p>concerning [6] 53/15 53/16 53/16 53/22 54/7 65/13</p> <p>concerns [3] 54/21 54/25 57/17</p> <p>concluded [3] 35/1 90/6 134/4</p> <p>conclusion [12] 20/19 44/19 44/20 45/4 46/3 46/4 57/20 58/23 106/5 121/9 126/17 126/19</p> <p>conclusions [2] 44/8 56/7</p> <p>conduct [11] 42/17 49/20 57/5 101/15 101/20 124/20 124/22 124/23 124/24 124/25 125/1</p> <p>conducted [7] 21/5 27/1 32/2 33/8 42/14 89/14 103/15</p> <p>conducting [5] 16/24 26/23 34/21 101/21 125/10</p> <p>conference [2] 7/19 35/12</p> <p>confidential [2] 54/3 54/18</p> <p>confidentiality [1] 19/14</p> <p>confirm [1] 106/20</p> <p>confirming [1] 25/18</p> <p>conflicts [1] 19/20</p> <p>CONNECTICUT [20] 1/3 1/18 1/19 6/3 11/15 11/18 12/8 12/8 19/20 19/24 52/7 52/12 52/19 53/3 106/16 121/21 127/18 127/20 137/1 137/6</p> <p>consciousness [1] 82/3</p> <p>consent [1] 113/7</p> <p>consider [2] 63/5 63/10</p> <p>consistent [5] 12/4 18/17 104/3 104/10 119/10</p> <p>Consistently [1] 24/19</p> <p>constitute [1] 110/15</p> <p>Constitution [1] 126/11</p> <p>constructed [1] 119/12</p> <p>contact [17] 31/15 32/3 32/11 32/14 33/22 33/23 34/3 34/4 40/24 41/3 64/8 65/20 66/2 71/9 111/9 119/19 130/18</p> <p>contacted [1] 32/16</p> <p>contacting [2] 26/24 63/5</p> <p>contained [13] 22/14 23/9 26/1 29/11 67/23 74/14 88/24 103/12 104/3 106/19 106/25 118/14 119/8</p> <p>contains [2] 32/5 66/10</p> <p>contend [1] 8/18</p> <p>contents [3] 72/24 73/1 73/17</p> <p>context [2] 37/6 38/8</p> <p>continue [2] 11/1 33/6</p> <p>continued [4] 3/17 92/16 93/12 131/1</p>	<p>contract [8] 12/21 14/1 15/1 19/23 20/1 112/15 112/15 130/1</p> <p>contracting [1] 14/15</p> <p>contributing [2] 51/4 51/19</p> <p>conversation [20] 35/4 45/6 91/8 91/17 92/5 92/10 92/21 94/15 94/21 95/9 96/6 96/19 96/22 99/22 110/24 113/9 114/24 115/7 121/8 132/7</p> <p>conversations [6] 62/13 91/11 91/13 104/1 113/4 120/16</p> <p>convey [1] 81/22</p> <p>convict [2] 54/13 54/18</p> <p>Cook [1] 1/23</p> <p>copied [2] 72/24 72/25</p> <p>copies [1] 68/2</p> <p>copy [15] 6/24 9/2 9/3 9/15 28/12 31/14 36/2 73/4 73/12 73/13 112/11 112/13 129/9 129/21 130/9</p> <p>corner [2] 21/17 55/18</p> <p>corporate [1] 66/22</p> <p>Corporation [15] 2/11 22/22 64/9 64/15 65/2 65/10 86/25 87/4 115/2 123/14 128/24 131/18 132/3 132/4 133/5</p> <p>corpus [1] 20/4</p> <p>correct [122] 7/13 10/8 10/17 10/18 14/6 18/1 23/21 26/13 26/21 27/22 27/24 28/25 29/6 29/21 29/22 30/5 30/6 30/11 31/23 32/24 33/12 35/5 35/22 36/11 38/20 38/21 39/22 39/25 42/14 42/15 46/14 46/15 48/24 50/11 50/12 53/5 53/7 56/5 56/6 56/18 57/9 57/10 57/12 60/8 60/9 66/14 72/22 78/20 78/20 88/16 89/1 89/2 91/5 91/6 91/23 92/7 92/8 93/4 93/5 93/6 93/12 93/18 93/19 93/22 95/1 95/2 95/5 95/6 95/23 97/4 97/14 97/15 97/18 97/19 98/6 99/10 99/11 99/14 101/4 101/7 101/10 101/11 101/15 101/16 102/5 102/9 102/10 102/20 103/9 103/13 103/21 104/11 104/15 104/18 104/20 104/22 105/1 105/6 105/11 105/23 106/10 106/23 107/15 108/4 108/7 109/14 110/5 110/19 110/20 114/8 114/17 115/22 116/11 116/24 116/25 117/24 118/3 121/2 121/3 129/7 131/21 132/11</p> <p>corrected [1] 117/15</p> <p>CORRECTION [1] 136/5</p> <p>corrections [2] 136/3 136/21</p> <p>correctly [4] 90/23 92/19 95/22 128/9</p> <p>correspondence [2] 27/15 59/22</p> <p>could [25] 7/9 13/6 17/14 21/1 21/12 31/8 32/3 37/21 38/23 38/24 49/5 49/18 54/6 54/17 54/18 59/24 64/17 72/7 82/16 97/20 102/1 111/11 123/5 123/22 133/13</p> <p>couldn't [3] 41/13 112/2 112/3</p> <p>counsel [28] 2/11 5/12 7/6 7/9 19/21 20/2 22/22 28/22 29/2 64/9 64/15 65/2 65/10 73/5 86/25 87/5 115/2 120/3 123/14 123/23 128/24 131/17 131/18 132/3 132/5 133/5 137/16 137/19</p> <p>Counsel's [1] 120/7</p> <p>country [1] 53/3</p> <p>County [2] 136/20 137/2</p> <p>couple [6] 60/23 70/25 80/15 91/25 103/2 131/7</p> <p>course [18] 8/7 11/7 11/9 19/8 27/9 33/7 38/12 55/7 70/21 75/16 98/18 99/6 100/5 100/7 125/4 125/24 126/10</p>	<p>127/10</p> <p>court [13] 1/2 4/8 5/5 6/4 7/18 7/24 15/24 98/3 100/15 100/21 101/1 101/2 120/6</p> <p>cover [3] 51/22 51/24 77/5</p> <p>covered [4] 52/2 52/4 97/1 133/13</p> <p>covering [1] 51/19</p> <p>creative [1] 52/14</p> <p>crime [14] 46/23 54/6 54/9 54/15 55/5 85/1 85/3 93/17 97/13 108/9 108/23 110/14 110/20 121/24</p> <p>criminal [5] 53/25 54/8 54/11 54/25 88/9</p> <p>Cross [4] 3/13 3/14 90/10 103/5</p> <p>Cross-Examination [4] 3/13 3/14 90/10 103/5</p> <p>CRUMBIE [1] 2/17</p> <p>crumbielaw.com [1] 2/20</p> <p>CT [8] 1/22 1/24 2/6 2/12 2/18 135/23 136/25 137/24</p> <p>ctfingertips [1] 1/25</p> <p>curious [2] 52/18 128/4</p> <p>current [2] 12/22 15/4</p> <p>currently [8] 10/16 11/10 13/22 14/18 14/19 14/23 15/6 18/24</p> <p>cut [1] 20/6</p> <p>CV [1] 1/6</p> <hr/> <p>D</p> <p>dangerous [1] 54/17</p> <p>database [5] 21/22 21/24 22/1 22/1 22/6</p> <p>date [17] 22/8 22/9 22/11 24/5 24/22 28/23 59/4 59/25 64/16 68/4 104/2 106/15 118/1 118/2 135/12 136/18 137/23</p> <p>dated [7] 28/5 36/4 59/5 60/15 68/8 106/20 118/4</p> <p>daughter [1] 16/12</p> <p>Davis [2] 71/6 71/6</p> <p>day [2] 135/15 136/20</p> <p>days [2] 62/23 63/3</p> <p>dead [30] 44/9 44/22 45/9 45/17 46/8 46/19 46/24 47/1 47/3 47/6 47/8 47/14 48/2 48/7 54/5 55/5 63/8 93/9 93/24 105/17 105/19 105/20 109/1 110/9 110/9 110/10 119/25 120/1 120/21 121/2</p> <p>debate [1] 110/14</p> <p>December [1] 17/9</p> <p>December 2014 [1] 17/9</p> <p>declaration [1] 91/16</p> <p>deem [1] 69/25</p> <p>defaulted [1] 42/10</p> <p>defendant [4] 2/10 5/4 20/3 29/3</p> <p>defendants [3] 1/10 2/16 19/21</p> <p>Defender [1] 19/19</p> <p>defense [3] 53/25 54/8 54/11</p> <p>define [1] 19/18</p> <p>defines [1] 124/24</p> <p>definitely [5] 10/10 69/23 85/18 99/19 119/8</p> <p>degree [1] 125/25</p> <p>deliver [2] 112/22 129/19</p> <p>demonstrate [2] 87/21 88/13</p> <p>denied [2] 61/11 62/24</p> <p>denying [1] 75/4</p> <p>department [17] 21/6 26/12 42/25 43/23 61/3 61/9 63/6 63/7 68/21 68/23 70/23 70/24 88/3 88/9 123/17 124/13</p>
---	---	--

<p>D</p> <p>department... [1] 124/16 depend [1] 123/3 deponent [4] 5/17 6/2 72/19 73/2 deposed [1] 7/18 deposition [20] 1/14 5/14 5/17 7/10 7/14 7/21 8/3 8/8 9/2 9/8 9/14 9/16 11/9 11/20 16/15 17/3 21/3 134/4 135/6 137/17 Deputy [1] 68/14 described [3] 40/9 42/1 114/25 DESCRIPTION [4] 4/4 49/7 49/15 118/16 Desiree [1] 18/24 despite [1] 108/2 destroy [1] 122/17 detail [3] 60/19 99/20 106/14 detailed [1] 22/10 details [18] 25/12 27/20 28/18 29/17 32/15 35/3 38/18 41/23 42/2 53/14 54/2 54/6 54/13 54/14 54/17 67/12 108/1 108/15 detective [3] 11/13 17/11 56/23 determination [1] 46/16 determine [5] 61/19 70/7 98/5 127/4 127/7 determining [1] 62/7 develop [1] 53/11 development [1] 15/6 Diana [2] 28/2 28/19 Diane [3] 19/2 22/24 39/23 did [184] did you [1] 112/16 didn't [44] 7/4 19/9 27/13 28/11 40/4 44/6 45/17 48/6 50/24 55/7 56/11 56/25 59/25 60/3 61/21 63/10 63/12 63/15 70/7 70/7 75/4 82/1 82/1 82/2 82/3 93/11 96/8 97/5 97/16 104/24 105/16 106/6 111/18 112/1 114/20 119/4 119/10 119/13 119/14 119/19 119/19 120/18 129/22 132/13 different [10] 9/21 37/23 49/23 51/19 52/17 57/13 58/15 77/15 79/1 105/21 differently [1] 9/22 direct [7] 3/12 6/7 33/22 64/17 96/3 111/4 112/6 directed [5] 5/8 96/6 105/9 131/25 133/3 directing [2] 47/18 132/3 direction [2] 58/14 115/16 directly [11] 8/2 22/18 62/9 65/16 66/20 69/13 71/18 79/4 98/18 126/10 129/1 director [7] 12/6 12/9 14/20 15/9 15/15 15/20 17/25 directs [1] 91/15 discourteous [2] 50/15 57/5 discuss [6] 32/16 34/6 34/9 111/12 111/13 112/3 discussion [1] 44/2 disk [10] 75/8 106/25 107/1 107/2 107/3 107/4 107/5 107/6 107/8 107/12 disobeyed [2] 110/13 110/17 dispose [1] 33/21 Disposition [1] 56/15 dispositions [1] 58/24 distance [1] 45/15 DISTRICT [2] 1/2 1/3 divided [1] 18/13 division [5] 26/11 66/17 66/18 71/12 71/14</p>	<p>do [165] document [39] 6/16 7/2 23/8 23/15 23/18 23/22 25/2 25/5 35/25 38/7 67/4 67/5 68/5 68/9 73/25 74/14 74/15 74/23 75/1 75/12 75/15 75/22 76/5 76/7 76/9 76/14 76/22 77/1 77/18 77/20 78/10 86/15 103/22 117/13 118/15 119/13 122/22 123/11 129/21 documentation [6] 31/18 31/19 32/1 32/3 70/13 128/23 documented [1] 27/13 documenting [2] 92/5 125/3 documents [18] 16/20 23/4 24/9 31/3 35/13 36/13 36/20 36/24 61/14 61/16 73/19 75/8 78/4 78/11 78/12 89/18 107/13 128/25 does [11] 22/9 48/1 49/15 50/12 61/9 86/22 93/6 106/19 108/19 110/15 125/15 doesn't [6] 43/3 43/25 75/18 95/19 118/25 123/10 doing [5] 14/21 42/9 57/1 86/17 87/17 don't [95] 8/16 9/13 9/13 19/4 19/11 21/22 28/10 28/10 34/6 35/8 36/1 36/19 36/19 37/1 37/11 37/19 37/20 41/12 42/10 42/11 43/9 43/13 43/15 43/15 43/25 44/3 44/6 45/12 51/17 57/22 60/12 63/13 63/24 63/24 63/25 65/3 65/4 65/15 65/15 65/17 68/2 74/16 74/25 75/6 75/9 75/24 76/8 76/15 77/16 78/22 78/25 79/8 80/8 80/12 80/12 81/8 81/10 81/17 81/20 82/8 85/4 85/16 86/6 86/14 86/19 86/24 86/25 89/2 89/3 89/16 94/4 94/7 94/7 94/18 99/17 99/25 100/6 100/8 100/10 101/23 102/24 102/25 111/7 111/18 115/8 115/8 117/10 118/8 118/21 122/21 123/2 128/4 128/12 130/8 132/22 done [7] 9/14 22/3 42/19 59/16 62/18 89/12 89/20 Donna [1] 87/20 down [7] 12/15 13/21 22/4 59/11 95/13 109/16 125/23 downtime [1] 19/10 draft [1] 122/25 drafted [2] 108/1 122/7 draw [4] 44/8 57/20 126/16 126/18 drew [1] 45/4 drive [1] 72/25 duly [3] 6/4 137/5 137/9 during [14] 7/10 8/7 9/22 11/9 12/10 13/2 33/16 35/14 39/17 51/22 55/7 98/13 99/15 100/7 duties [4] 12/3 12/13 12/16 55/8 duty [3] 57/1 124/25 125/4 DVD [3] 71/23 72/21 73/1 dying [1] 91/15</p> <hr/> <p>E</p> <p>e-mail [20] 24/22 40/20 40/24 59/1 59/17 60/5 60/11 60/15 60/19 60/21 60/23 62/18 63/14 70/17 71/5 71/7 102/3 102/4 102/7 115/6 e-mailed [3] 31/14 60/2 71/16 e-mailing [1] 10/25 e-mails [9] 10/24 21/13 40/11 59/2 59/15 59/17 62/8 62/14 102/1 each [5] 5/4 5/5 34/12 57/11 57/17 earlier [5] 30/3 75/2 76/8 80/1 102/18</p>	<p>Ed [2] 114/5 130/4 Ed Peruta [1] 114/5 edited [5] 44/24 45/5 45/10 95/4 107/13 editing [1] 96/20 education [2] 51/20 52/6 EDWARD [1] 1/6 effect [2] 111/7 126/9 eight [7] 12/2 12/4 12/10 13/3 14/4 14/5 73/25 either [3] 117/12 121/22 128/7 elaborate [1] 54/10 electronics [1] 13/19 else [12] 14/7 14/24 15/20 16/6 16/8 16/14 16/23 35/10 37/2 65/19 66/2 92/9 Emergency [1] 71/14 employed [10] 11/10 11/22 11/25 14/23 15/1 53/8 66/18 87/6 137/16 137/19 employee [4] 14/13 14/19 14/23 137/18 employment [3] 15/4 15/5 65/18 end [12] 9/7 45/11 45/12 45/14 46/9 47/1 85/25 85/25 92/18 95/21 98/24 125/3 ended [4] 12/19 30/23 66/1 111/15 ends [2] 52/16 53/11 enforcement [1] 127/21 engine [1] 125/13 enlarge [1] 97/13 enough [3] 57/19 57/22 57/23 enter [3] 73/5 82/3 82/3 entered [1] 22/12 entering [1] 22/5 entire [1] 13/3 entry [1] 97/17 episodes [3] 14/3 14/5 14/6 errata [5] 9/7 9/12 17/2 135/9 136/1 error [4] 42/12 108/4 117/23 117/24 especially [1] 39/21 Esq [3] 2/7 2/13 2/20 essentially [4] 104/12 105/8 106/4 108/12 established [1] 34/13 ET [1] 1/10 even [13] 11/2 17/23 38/25 42/22 61/21 70/12 75/25 89/8 100/23 103/25 104/24 115/23 117/15 ever [19] 7/14 7/18 9/14 35/24 40/8 43/13 43/16 47/13 65/11 65/15 66/1 86/7 91/13 94/3 102/11 112/4 124/12 126/15 132/12 every [4] 5/6 69/7 69/8 90/7 everybody [1] 85/1 Everyone [2] 93/22 117/16 everything [4] 36/22 90/18 117/5 123/2 Everything's [1] 62/18 evidence [13] 20/24 54/4 57/16 57/20 57/23 74/7 96/5 96/16 98/5 105/12 106/2 110/6 132/4 exact [4] 3/5 41/1 111/8 118/2 exactly [4] 3/4 10/9 45/12 117/12 examination [13] 3/12 3/13 3/14 3/15 3/16 3/17 6/7 90/10 103/5 114/1 128/16 131/1 137/11 examined [1] 137/11 example [1] 18/14 Excellent [1] 9/11 except [2] 5/8 87/1 excessive [3] 87/20 87/23 127/9 exchanged [1] 111/8 exhibit [127] 4/4 6/21 7/2 7/20 21/1</p>
--	--	---

E
exhibit... [122] 21/3 21/9 21/11 21/12
21/16 22/15 23/4 23/6 23/10 23/13
23/16 24/5 24/17 24/21 24/25 25/3
25/8 25/16 25/21 25/25 27/2 27/20
28/17 28/23 29/11 29/18 29/20 29/24
32/22 35/23 36/4 36/15 38/17 39/11
39/12 40/25 41/14 43/5 43/8 43/20
48/21 49/6 50/9 56/4 59/15 60/5 60/15
62/14 63/20 63/21 64/20 65/6 66/8
66/16 67/3 67/16 67/20 67/21 68/3
68/18 72/8 72/20 73/6 73/17 73/21
74/21 75/2 75/10 75/13 75/14 75/20
76/3 76/8 76/12 76/18 77/4 77/13 78/6
79/15 79/18 80/14 80/15 80/20 80/22
81/5 81/14 81/19 82/4 82/5 82/10
82/12 82/18 82/20 83/2 83/8 83/13
83/19 83/24 84/5 84/9 84/14 84/20
85/6 85/22 86/3 86/7 86/8 88/17 88/25
90/19 95/14 97/22 100/13 102/2 107/1
115/20 118/14 120/25 123/1 123/8
124/10 124/11
Exhibit 27 [6] 43/5 43/8 43/20 123/8
124/10 124/11
Exhibit 57 [2] 86/7 86/8
Exhibit 61 [3] 29/18 72/20 73/17
Exhibit 61A [18] 23/13 23/16 24/5
24/17 24/21 24/25 25/16 25/21 25/25
27/2 28/23 29/11 29/20 49/6 50/9
64/20 75/14 118/14
Exhibit 61B [6] 67/20 67/21 68/3 68/18
88/17 88/25
Exhibit 61C [30] 21/1 21/11 21/12
21/16 22/15 23/10 25/3 25/8 27/20
28/17 29/24 32/22 38/17 39/12 40/25
41/14 48/21 56/4 59/15 60/5 60/15
65/6 90/19 95/14 97/22 100/13 102/2
115/20 120/25 123/1
Exhibit 61D [2] 63/21 66/8
Exhibit 61E [1] 66/16
Exhibit 61F [2] 67/3 67/16
Exhibit 61G [2] 36/4 36/15
Exhibit 61H [6] 79/18 80/14 80/15 82/4
82/12 82/20
Exhibit 61I [1] 72/8
Exhibit 62 [3] 7/2 7/20 21/3
exhibits [2] 4/1 4/8
exist [1] 132/2
exonerate [2] 57/25 58/5
expected [2] 62/21 112/1
expecting [1] 129/13
experience [5] 50/19 51/2 54/24 61/7
121/22
experience that [1] 61/7
Expires [3] 135/20 136/24 137/25
explain [3] 8/23 9/12 19/18
express [1] 100/19
extension [1] 62/24
extensions [1] 63/2
extent [1] 71/18
extremely [2] 111/19 128/4
eyes [1] 77/5

F
F.O.I [6] 71/12 112/11 129/10 129/19
129/22 130/16
fact [11] 21/14 46/13 54/4 54/21 56/24
104/23 108/2 115/23 118/11 131/7
133/4
facts [3] 20/21 46/17 127/10

failure [1] 107/17
fair [17] 15/16 22/2 31/1 35/19 36/3
41/15 56/7 59/8 104/8 105/9 105/24
106/3 110/16 122/25 131/6 131/10
131/13
fall [4] 17/7 17/8 17/17 18/3
familiar [15] 20/8 23/15 23/18 55/16
59/3 67/4 75/18 76/11 79/20 114/8
114/9 114/14 121/20 121/23 130/4
far [3] 26/16 58/7 113/12
favor [1] 100/24
fax [1] 24/22
Federal [1] 1/18
feel [5] 40/4 57/16 69/9 111/16 111/18
felt [3] 37/3 62/25 129/20
Feola [2] 2/13 3/14
Feola-Guerrieri [2] 2/13 3/14
feoln001 [1] 2/14
Ferraro [5] 19/2 22/24 29/10 39/23
42/8
few [9] 35/18 63/15 64/16 71/6 71/7
87/9 89/25 90/18 101/14
fifth [1] 49/8
file [8] 61/25 62/2 62/11 67/17 72/18
72/20 72/21 103/13
filed [2] 49/7 49/19
fill [1] 59/23
filled [2] 28/17 30/12
film [8] 44/9 46/8 47/3 48/7 85/12 93/12
93/24 94/6
filming [61] 12/15 12/17 12/18 16/11
44/22 44/25 45/8 45/9 45/14 45/16
45/17 46/12 46/18 46/23 46/24 46/25
47/8 47/19 48/2 48/10 54/22 55/5 57/1
92/17 92/18 92/25 93/7 93/9 93/25
94/10 95/20 95/25 96/4 96/7 105/10
105/14 105/17 105/19 105/21 106/1
108/11 108/25 109/1 109/13 110/9
110/9 110/10 110/11 118/20 119/1
119/15 119/21 119/25 119/25 120/8
120/16 120/19 120/21 120/23 121/2
121/5
final [13] 20/18 20/21 20/24 36/23 49/3
59/4 59/10 59/21 59/21 86/24 87/4
116/3 132/4
finale [2] 13/24 14/1
financially [1] 137/20
find [9] 56/11 57/11 57/25 81/23 100/24
106/8 111/21 119/10 125/25
finder [1] 46/14
finding [2] 100/21 110/17
findings [11] 20/20 46/17 56/5 57/14
58/15 97/23 97/24 111/12 114/25
122/22 132/8
finds [1] 110/12
fine [1] 55/21
finished [1] 36/7
finishes [1] 13/7
finishing [1] 3/7
first [63] 6/3 13/25 20/7 21/16 23/13
23/16 24/4 24/16 24/20 25/2 25/8
25/17 25/25 26/2 27/2 27/19 28/16
28/23 29/20 30/21 35/2 38/17 39/11
39/12 44/2 44/5 47/21 50/9 52/11 56/4
56/8 64/17 64/20 67/6 68/3 68/12 71/1
78/23 79/9 79/10 86/17 87/6 92/1 92/3
92/14 92/19 94/24 95/15 98/1 98/7
98/7 98/9 98/14 105/4 106/11 106/14
106/17 110/14 115/14 126/24 127/3
131/14 131/24

Fit [1] 107/20
five [11] 21/13 21/25 49/12 58/8 65/6
67/21 72/14 89/22 109/22 110/3 110/7
Floor [1] 2/18
folder [3] 72/18 72/20 72/21
folders [1] 73/20
FOLEY [2] 1/10 68/14
follow [9] 43/18 55/4 90/18 90/25 100/8
103/3 118/24 128/14 130/24
follow-up [7] 43/18 90/18 100/8 103/3
118/24 128/14 130/24
followed [3] 58/2 58/4 60/22
following [4] 37/14 95/21 136/3 137/8
following-named [1] 137/8
follows [3] 6/5 32/20 68/8
footage [3] 69/10 69/15 69/16
footage from [1] 69/16
force [6] 87/20 87/23 88/6 88/7 97/17
127/9
foregoing [2] 135/5 136/21
forgot [3] 13/12 90/1 131/19
form [35] 5/9 23/11 23/12 23/23 24/16
25/1 25/20 27/12 28/11 28/21 29/11
32/8 38/20 44/12 45/21 46/21 50/17
68/25 75/13 77/11 77/17 77/21 78/5
78/8 78/10 78/19 78/24 86/13 118/25
119/2 119/22 122/9 123/19 123/25
126/21
formal [5] 101/21 116/5 116/6 118/8
127/22
formally [2] 127/25 128/2
format [5] 23/15 36/21 37/2 38/7 75/8
former [6] 14/12 47/17 50/20 50/22
53/21 65/10
forum [1] 54/16
forward [3] 30/22 54/13 100/25
found [4] 99/3 111/10 112/1 125/23
four [2] 57/4 58/16
fourth [6] 88/25 92/14 107/25 108/15
109/16 126/12
frame [1] 17/14
Freedom [3] 89/17 112/21 129/10
fresh [2] 53/24 55/10
front [4] 8/2 64/18 88/18 123/5
full [9] 24/8 24/15 25/24 29/14 51/6
92/2 106/16 107/25 108/15
full-time [1] 51/6
further [9] 5/16 99/22 113/21 128/12
130/18 133/25 134/1 137/15 137/18

G
gain [1] 71/23
Gardner [1] 18/24
gas [1] 69/11
gather [3] 27/8 46/2 63/1
gathered [6] 22/13 23/5 23/10 31/3
31/17 97/12
gave [2] 112/11 119/20
Gee [1] 118/24
general [5] 40/5 43/13 56/22 124/16
130/10
generally [21] 18/17 27/10 29/13 33/17
33/19 59/11 62/23 63/13 63/14 69/8
69/20 93/20 111/19 111/21 118/10
119/5 122/23 124/21 126/1 128/22
133/1
Gesturing [1] 19/22
get [27] 9/15 9/16 13/8 27/13 41/3
47/10 54/6 54/16 55/20 58/14 63/8
63/14 63/15 64/25 68/2 72/8 73/23

G
get... [10] 87/2 88/8 89/17 92/17 93/21
93/22 119/6 120/5 123/6 126/8
getting [3] 15/7 38/25 133/13
give [9] 36/21 41/7 61/6 71/3 75/3 76/1
107/4 127/1 129/21
given [9] 5/6 18/15 18/15 37/2 61/14
61/16 118/19 135/5 137/13
giving [2] 17/12 117/18
gleaned [1] 32/7
go [20] 8/16 13/18 14/1 15/1 15/19
48/11 49/6 49/12 50/6 55/7 55/13
73/17 74/5 76/25 77/10 77/10 88/12
94/13 120/6 125/17
God [1] 77/6
goes [1] 30/16
going [42] 6/16 8/22 12/18 22/4 23/3
24/25 26/22 34/21 36/16 38/17 46/8
48/11 48/21 51/25 61/6 62/10 65/4
67/3 70/11 71/21 73/17 78/4 79/9
80/14 87/16 89/5 89/19 89/20 91/22
93/24 94/13 95/13 95/15 99/5 100/24
106/24 112/12 120/6 128/5 128/19
129/25 133/10
gone [2] 26/3 122/6
good [4] 6/10 6/11 65/24 125/21
Google [7] 101/23 101/24 125/11
125/13 125/17 125/17 125/23
got [7] 10/22 18/11 34/23 36/4 39/10
90/23 117/10
gotten [1] 40/21
government [2] 19/15 19/17
grab [3] 63/20 90/19 123/5
graduate [1] 52/19
graduation [1] 52/12
granted [1] 62/24
great [3] 8/17 9/24 125/24
Greg [1] 115/15
grid [1] 13/19
GROUP [1] 2/17
Guerrieri [2] 2/13 3/14
guess [7] 7/9 9/16 28/12 45/15 99/1
113/12 127/12

H
H.P [2] 66/15 66/23
habeas [1] 20/4
had [88] 12/15 17/11 17/25 25/18 26/7
31/3 31/4 33/22 33/22 34/10 34/13
35/17 37/2 39/15 39/23 40/11 40/21
43/14 44/4 45/10 53/10 53/13 53/24
54/8 54/19 55/10 59/20 60/2 63/8
67/21 69/23 70/15 71/1 72/3 78/24
79/17 80/1 87/15 88/23 88/23 89/10
92/6 92/6 93/2 94/3 94/15 94/16 94/18
94/23 97/12 98/13 98/20 98/21 99/3
99/3 99/8 99/12 100/8 101/5 101/6
101/19 110/23 111/9 111/10 112/5
112/18 113/13 113/14 114/9 114/24
115/10 115/13 119/17 120/3 123/4
123/21 125/6 126/15 126/24 126/25
127/3 127/10 127/14 127/14 130/4
130/4 131/17 132/7
hand [7] 7/4 21/17 66/8 112/22 117/15
117/20 129/19
hand-deliver [2] 112/22 129/19
hand-write [1] 117/20
hand-written [1] 117/15
handed [2] 21/11 112/20
handled [1] 64/24

hands [1] 94/3
handwriting [9] 77/15 78/15 107/7
107/10 107/11 107/15 107/16 107/19
107/21
happen [1] 9/19
happened [4] 53/25 59/19 61/19 111/2
happens [1] 9/21
happy [1] 111/25
harassed [1] 109/22
harassment [3] 49/21 57/8 110/15
hard [3] 16/22 72/25 73/24
Harris [3] 2/20 3/13 3/16
HARTFORD [57] 2/11 2/12 2/18 6/3
11/15 11/18 18/20 20/8 20/12 21/5
22/5 23/19 24/9 26/12 36/23 42/25
43/23 45/16 46/11 55/17 58/25 61/2
61/8 63/6 64/2 64/9 65/20 66/2 68/21
68/23 70/23 78/8 79/10 86/22 88/3
88/20 89/13 97/25 98/9 99/2 104/21
106/16 111/9 112/12 112/14 112/22
113/1 118/9 122/17 123/16 124/13
124/16 125/7 126/15 129/18 129/19
137/2
Hartford's [1] 22/19
hartford.gov [1] 2/14
HARTLAND [1] 137/1
Harwinton [2] 1/19 2/6
has [18] 6/15 6/16 13/2 17/22 23/22
24/5 24/17 26/19 60/15 65/19 68/4
90/6 98/2 108/4 123/7 126/5 129/1
131/6
hasn't [2] 15/6 26/3
have [180]
haven't [2] 7/18 67/6
having [5] 6/4 75/15 75/22 76/5 76/20
he [148]
he'll [1] 100/25
he's [8] 45/7 46/8 46/25 111/19 119/25
131/10 131/13 131/14
head [4] 80/8 81/8 81/17 87/25
headquarters [1] 11/14
hear [3] 93/24 96/8 119/20
heard [8] 28/8 44/22 96/9 105/17 109/1
110/8 121/1 125/11
heart [1] 53/21
held [2] 40/23 51/2
hello [1] 111/6
help [1] 126/3
her [35] 15/23 17/11 17/12 17/12 19/10
30/10 30/15 30/15 31/14 31/25 32/6
37/13 39/6 40/4 40/19 40/21 40/24
41/1 41/13 42/11 43/10 59/22 59/23
60/3 60/11 62/15 64/4 64/6 64/25
81/23 87/19 111/5 115/5 137/11
137/11
here [20] 6/17 7/3 7/9 11/15 25/13
35/23 37/21 37/21 39/8 40/12 43/5
46/6 63/20 67/11 77/10 78/10 78/20
89/23 91/25 133/12
hereby [2] 136/3 137/6
hereto [1] 137/19
hide [1] 13/18
high [3] 52/6 52/8 52/9
highlighting [1] 74/1
Hill [1] 1/23
him [75] 14/14 32/4 33/4 34/14 34/20
34/20 34/24 44/2 45/6 45/16 45/17
46/8 46/11 46/25 56/25 61/24 61/24
68/15 68/15 68/16 71/4 71/5 71/5 71/7
71/10 71/17 72/5 76/10 92/16 92/18

92/25 93/7 94/3 94/8 94/10 94/10
95/20 95/25 96/3 96/7 98/13 98/21
98/22 99/3 99/3 99/15 99/18 99/20
99/24 105/16 105/17 106/1 108/10
108/25 111/10 111/10 111/11 111/22
112/1 112/2 112/2 112/5 112/11
112/18 112/18 112/20 113/9 113/10
114/9 114/25 118/23 120/16 121/11
130/5 132/7
hire [1] 19/23
his [48] 14/16 29/5 37/4 39/6 39/16
44/1 44/5 47/2 49/8 49/9 49/12 49/20
49/22 56/11 56/12 56/22 57/1 63/9
71/16 74/7 75/23 85/12 92/3 94/6
95/18 95/19 96/20 98/5 99/23 100/24
101/3 101/6 104/12 106/17 108/20
109/12 111/16 111/21 111/24 112/10
112/19 113/5 113/10 113/11 115/16
119/24 126/23 130/8
hits [1] 125/23
hmm [3] 109/6 109/18 127/16
hold [2] 51/17 120/4
homicide [15] 53/23 54/2 54/15 55/7
55/10 55/14 61/5 61/7 61/21 61/25
70/3 70/10 70/14 97/6 110/14
hope [1] 79/14
host [1] 51/25
Hot [1] 66/24
hours [1] 67/13
house [4] 112/19 112/20 113/10 113/11
how [26] 9/15 11/22 11/25 12/13 14/3
14/14 17/16 18/9 19/2 20/14 34/1
34/15 35/6 45/4 64/4 72/10 98/17
100/22 101/19 112/16 115/17 121/23
122/1 122/2 131/4 132/25
however [4] 17/10 19/18 62/23 128/2
HPD [2] 92/3 106/17
Human [8] 64/10 64/13 64/21 64/22
65/2 65/3 131/23 132/1
Hungerford [1] 55/17
Hunted [4] 13/17 14/8 14/9 14/10
hyphen [1] 15/13
hyphenate [1] 10/24
hyphenated [1] 11/2

I
I am [1] 137/18
I know [1] 99/19
I'll [15] 9/22 11/6 15/19 19/17 24/21
35/23 37/9 41/20 43/18 44/17 59/12
62/20 66/8 68/17 104/6
I'm [103] 6/16 8/6 9/15 13/12 14/1
14/19 14/21 14/25 15/1 15/7 15/8 16/2
16/9 16/23 18/5 23/3 23/7 25/18 28/6
29/2 31/21 32/9 34/19 34/23 36/16
36/22 37/6 37/25 38/2 40/19 41/1 43/7
43/12 45/7 45/23 46/2 47/23 48/11
52/18 52/18 53/10 53/13 55/12 56/12
58/13 59/2 59/14 61/15 61/25 64/16
65/4 65/5 65/22 65/22 66/8 66/21
70/11 71/21 73/16 75/4 76/25 77/17
77/17 78/3 78/7 78/10 80/14 87/11
88/16 89/19 89/20 89/20 90/13 92/12
94/13 95/15 98/16 98/24 99/5 99/8
99/18 99/24 102/2 103/17 105/7
106/24 108/14 109/3 111/12 111/14
111/18 114/18 115/25 120/6 125/10
125/21 126/1 127/10 128/2 128/3
128/5 129/16 129/16
I've [32] 7/16 9/14 26/7 43/13 43/16

<p>I I've... [27] 61/14 62/16 62/17 62/23 62/24 63/1 68/1 68/15 69/16 69/17 71/10 71/11 71/16 71/19 122/21 123/11 123/21 124/11 125/6 125/7 126/2 126/15 126/16 126/25 127/3 127/7 127/10 I.A [2] 21/6 89/6 I.A.D [4] 25/23 26/2 26/8 26/16 i.e [2] 105/3 105/25 IAD [1] 25/14 ID [1] 6/21 idea [1] 129/23 identification [2] 4/1 63/9 identified [4] 40/17 59/20 60/2 61/1 identifies [1] 39/5 identify [11] 27/14 27/16 40/8 41/13 47/13 48/15 60/7 62/15 70/19 102/8 102/12 identity [5] 62/7 63/14 63/16 70/17 81/23 if it [1] 81/9 illegal [1] 126/12 imagine [1] 35/8 immediately [1] 17/25 impacted [1] 54/25 imperative [1] 54/2 imperial [1] 130/1 implanting [1] 81/11 implied [1] 112/25 important [1] 88/12 in this [1] 137/20 in-hand [1] 7/4 in-person [5] 30/20 32/17 33/7 33/23 100/9 INC [1] 1/6 inception [1] 112/15 incident [12] 40/16 49/8 49/16 53/23 60/25 61/4 72/2 79/7 92/3 106/17 118/16 129/8 include [1] 123/2 included [1] 97/21 including [1] 130/5 inconsistent [1] 119/11 Indeed [2] 45/2 48/1 independent [4] 14/15 85/2 89/10 89/11 indicate [9] 21/12 22/3 22/9 40/1 42/13 54/20 67/22 102/11 114/4 indicated [16] 6/12 7/20 30/21 40/25 53/14 67/15 70/4 88/23 103/11 105/13 106/7 108/1 113/14 120/8 131/17 132/6 indicates [7] 3/6 30/6 32/1 32/10 39/14 79/9 108/8 indicating [4] 30/13 48/6 48/17 49/14 indication [2] 119/20 120/4 indirect [2] 112/7 113/15 individual [3] 29/5 62/7 63/18 individuals [1] 55/9 industry [1] 122/5 inform [1] 115/2 information [60] 1/6 22/6 22/14 22/18 23/5 23/9 24/9 24/16 25/9 25/11 25/19 25/24 27/8 27/11 28/17 28/20 29/14 29/16 30/12 30/19 31/2 31/17 32/7 35/2 35/3 39/16 40/13 40/14 41/4 41/8 41/9 41/22 41/23 57/23 60/3 62/3 62/10 63/1 68/20 68/22 70/3 71/2 71/13 71/23 71/25 78/25 89/18 97/11 97/12 97/16 103/11 103/14 104/2</p>	<p>104/4 112/21 119/6 119/7 119/9 122/5 129/10 initial [3] 22/3 62/22 99/9 initialing [1] 118/3 initially [1] 128/3 initials [1] 117/24 instance [2] 42/7 125/2 instead [2] 10/6 10/25 intake [14] 22/4 22/7 23/1 23/2 25/3 27/12 27/25 29/14 29/19 38/20 39/3 42/8 50/8 62/22 Integrated [16] 6/2 11/11 11/12 14/12 41/2 66/1 66/17 66/19 66/21 103/12 103/18 112/10 112/14 112/25 130/10 131/25 intend [1] 129/24 intended [2] 112/21 129/18 intends [4] 98/2 100/14 100/20 101/1 intense [1] 12/15 intention [1] 46/18 interactions [1] 61/24 interdepartmental [1] 88/24 interest [1] 131/14 interested [1] 137/20 interfering [3] 70/15 110/21 110/22 internal [17] 26/4 26/10 26/22 27/3 27/8 27/15 41/2 63/6 65/5 67/25 70/24 71/9 71/19 79/4 89/3 89/9 89/14 intersection [1] 55/16 interview [22] 30/15 30/20 30/22 31/16 32/4 32/17 33/7 33/8 33/13 33/16 34/21 35/6 35/14 39/17 42/9 69/22 98/13 99/9 99/12 99/16 100/9 103/15 interviewed [5] 20/23 38/23 38/24 72/5 121/11 investigate [2] 63/3 105/3 investigated [1] 86/15 investigating [5] 71/22 86/11 97/3 133/2 133/6 investigation [58] 20/23 21/5 26/15 26/17 26/23 27/1 27/4 27/9 29/12 30/7 30/10 30/25 31/4 33/6 34/16 35/1 36/8 41/5 41/10 41/16 42/16 43/11 44/8 49/4 49/19 53/24 54/15 54/16 57/14 61/5 61/8 61/10 61/13 61/20 61/21 62/1 62/22 69/9 70/4 70/10 75/16 79/12 87/19 89/4 89/9 89/11 89/14 97/7 98/19 99/1 99/6 99/23 99/25 100/7 115/14 124/19 125/10 133/3 investigations [23] 12/7 14/13 15/17 15/21 16/7 16/24 19/6 19/25 20/11 24/10 26/18 52/24 54/2 65/21 66/15 68/22 68/24 70/22 86/18 86/23 87/17 88/11 122/18 Investigative [3] 59/5 103/23 121/17 investigator [18] 12/20 18/15 18/19 18/21 22/23 29/25 30/4 32/23 41/15 46/14 48/22 53/25 54/8 54/11 54/25 87/18 89/10 108/6 investigator's [1] 42/7 investigators [5] 13/20 18/12 18/16 20/18 33/1 invoice [1] 67/7 involved [4] 14/7 40/17 41/16 60/25 is [256] isn't [3] 57/23 81/11 119/9 ISS [30] 11/23 11/25 12/21 14/7 14/18 14/19 14/24 15/3 17/23 18/12 21/5 21/21 26/20 29/10 30/4 31/4 41/2 49/19 53/6 61/9 62/19 62/21 64/11</p>	<p>65/19 66/13 68/21 70/22 86/22 87/7 128/9 issue [1] 8/18 issues [4] 8/10 51/21 51/22 51/25 issuing [1] 20/21 it [269] it's [79] 6/13 11/13 12/19 13/17 13/17 13/17 14/8 14/9 15/5 22/4 24/1 25/13 26/1 28/12 33/19 36/4 36/13 37/6 37/24 41/17 42/18 45/13 47/8 47/15 51/17 54/1 54/9 58/22 59/13 61/5 61/7 61/11 61/20 63/21 63/23 66/17 67/2 69/24 70/6 70/10 72/13 73/23 74/25 75/3 75/13 75/18 75/24 75/25 75/25 77/12 77/15 77/15 78/16 78/17 78/20 78/22 78/25 84/17 85/9 85/25 87/2 88/7 88/20 97/6 99/18 100/9 109/2 115/8 115/23 116/3 116/5 117/5 117/13 118/3 118/5 118/16 125/13 125/15 126/12 its [2] 62/22 86/23 itself [1] 107/3 J J-o [1] 15/13 JACQUELINE [17] 1/15 4/3 6/1 10/16 10/19 10/21 10/23 11/1 11/3 48/25 73/2 135/4 135/12 136/3 136/18 136/21 137/8 jailhouse [1] 54/12 JAMES [2] 1/9 2/10 Jan [1] 52/1 Jo [5] 15/11 15/13 16/7 17/7 18/2 job [8] 12/3 14/15 41/1 52/11 52/22 88/8 127/24 128/3 jobs [3] 19/12 51/2 53/10 join [3] 31/6 69/2 119/3 joined [1] 53/6 joke [1] 67/2 jot [1] 59/11 journalist [7] 50/20 50/22 51/3 52/10 53/20 53/21 53/22 journalists [1] 121/23 judgment [1] 127/6 JURAT [1] 135/2 just [105] 10/1 10/23 13/6 16/9 16/12 18/4 18/23 19/18 20/1 20/20 21/11 24/4 24/20 25/18 27/17 28/10 28/23 29/1 29/7 34/2 34/24 35/11 35/24 36/3 36/12 37/6 37/12 38/24 40/3 40/4 40/22 42/12 42/20 42/21 43/12 43/18 44/5 45/23 46/2 49/5 49/12 50/6 53/24 53/25 54/10 57/1 57/23 58/11 58/13 58/16 59/24 63/12 63/22 67/2 67/2 68/17 70/6 70/11 71/8 71/25 72/16 73/5 73/12 75/6 77/17 77/17 78/10 79/17 80/11 81/11 82/1 82/1 82/3 82/14 87/1 88/6 89/21 89/22 90/22 92/1 93/2 93/8 93/9 93/16 94/23 96/14 96/16 99/8 100/4 106/24 109/3 109/3 111/18 111/21 111/25 118/2 119/11 122/21 123/5 125/12 125/16 125/17 126/11 128/19 130/9 justice [1] 88/10 K Kee [1] 65/7 keep [2] 33/19 122/23 keeping [1] 49/5 Kim [1] 72/19</p>
---	--	---

K

Kimberly [4] 64/2 66/5 72/19 115/4
 kind [6] 20/5 20/6 51/22 73/24 115/13
 126/7
 kinds [1] 52/17
 knew [3] 10/23 26/16 114/4
 Knight [14] 40/19 40/20 40/20 41/9
 59/18 60/5 60/6 60/10 60/18 62/14
 70/21 81/22 102/4 102/11
 know [128] 7/8 9/13 9/13 9/23 10/12
 10/25 15/24 16/15 16/25 19/7 22/17
 24/15 29/9 29/16 30/22 34/19 36/3
 36/13 37/1 37/12 37/19 37/20 37/22
 37/23 40/3 40/23 41/7 42/4 42/10
 42/11 42/22 43/22 45/12 47/1 47/16
 47/16 48/5 48/16 51/21 53/10 53/18
 53/21 54/1 54/10 54/12 54/14 55/9
 56/13 56/23 57/2 57/19 58/12 58/22
 59/1 59/12 59/14 59/15 63/13 64/1
 64/6 64/14 64/21 64/24 65/3 65/4 65/9
 66/15 66/23 68/11 68/14 68/15 68/20
 69/14 69/17 69/19 69/21 70/6 70/11
 71/17 71/17 72/10 73/23 74/16 75/5
 75/7 77/5 78/9 78/22 78/24 78/25
 85/14 85/16 86/16 87/2 88/8 89/16
 98/24 99/19 99/25 100/2 101/23
 102/16 111/13 111/25 112/1 112/16
 115/6 117/17 119/6 119/7 119/12
 120/3 121/20 125/22 125/25 126/9
 126/11 126/16 127/6 127/8 129/20
 130/2 130/8 130/9 130/11 132/12
 132/14 133/12
 knowing [1] 62/6
 knowledge [11] 24/1 54/9 58/15 67/12
 85/2 117/6 122/1 122/4 132/13 135/7
 136/4
 known [5] 10/19 64/4 131/4 131/10
 131/14
 knows [2] 100/22 130/11
 Krampitz [1] 52/1
 Kristin [16] 15/22 17/20 17/21 17/22
 18/10 18/20 29/25 30/14 31/13 33/4
 41/15 42/9 91/2 91/3 104/1 121/10

L

larger [4] 83/22 84/3 84/8 84/12
 last [20] 12/5 12/11 15/20 15/23 21/13
 39/14 40/25 49/1 59/14 59/23 60/3
 60/14 68/17 77/2 77/3 77/11 87/10
 95/14 112/4 133/11
 later [3] 16/16 60/23 100/2
 law [25] 1/18 2/17 35/18 37/2 37/3 38/1
 38/3 38/9 56/10 58/4 92/3 101/12
 101/25 106/17 106/22 125/14 125/19
 125/20 126/1 126/14 126/25 127/1
 127/4 127/11 127/21
 laws [1] 42/22
 lawsuit [1] 133/2
 lawsuits [1] 113/2
 lawyer [2] 18/18 56/12
 lawyers [1] 126/3
 learned [1] 133/22
 learning [2] 52/16 52/18
 least [3] 35/20 80/15 99/2
 leave [1] 40/6
 led [1] 133/18
 left [4] 14/14 16/10 20/16 40/7
 legal [16] 11/2 11/3 42/14 42/17 42/21
 56/7 101/15 101/20 101/21 126/4
 126/4 126/7 126/9 126/16 126/18

127/2

Legend [1] 3/2
 let [21] 9/23 27/17 28/16 35/23 36/12
 43/5 50/6 53/12 53/12 58/11 63/20
 71/21 74/4 93/14 94/22 99/5 99/8
 111/25 128/20 128/21 133/15
 let's [5] 32/14 41/19 50/25 79/14
 117/21
 letter [1] 63/21
 Lexis [1] 101/17
 LexisNexis [1] 101/22
 Lic [4] 1/22 135/23 136/25 137/24
 license [1] 17/11
 Lieutenant [7] 68/11 71/1 71/2 71/6
 71/10 102/19 102/22
 life [1] 51/17
 like [14] 13/20 15/23 17/24 18/17 19/7
 19/18 24/1 25/5 37/24 70/11 72/13
 78/17 83/6 128/3
 liked [1] 18/18
 likely [2] 26/23 81/10
 limits [2] 70/5 70/6
 line [6] 9/9 39/4 47/21 77/16 111/4
 136/5
 lines [1] 112/23
 list [7] 4/1 27/20 38/22 39/9 53/19
 56/17 57/4
 listed [14] 27/12 28/1 29/16 35/20
 37/18 41/22 48/22 50/6 58/7 58/16
 65/7 66/16 68/12 77/21
 listing [1] 49/22
 lists [2] 38/22 41/14
 Litchfield [2] 113/12 114/16
 litigation [2] 132/19 132/22
 little [4] 53/9 54/10 67/2 74/3
 live [1] 114/16
 lives [1] 114/19
 LLC [1] 2/17
 lobby [1] 6/13
 local [2] 11/15 130/6
 located [2] 11/17 52/25
 location [3] 15/21 18/13 55/13
 long [16] 6/15 11/22 11/25 25/4 35/6
 36/7 51/17 57/18 64/4 72/10 75/24
 82/23 122/2 122/2 131/4 131/5
 longer [2] 39/24 129/5
 look [14] 21/12 36/3 36/13 36/16 42/24
 60/14 67/20 75/18 102/1 104/6 122/8
 122/12 125/19 127/3
 looked [3] 19/9 20/24 81/10
 looking [20] 20/21 27/14 41/8 53/13
 56/3 71/13 77/8 80/6 88/8 89/11 92/1
 92/14 100/11 102/2 102/2 111/5
 118/15 125/19 126/1 131/10
 looks [3] 25/5 37/24 78/17
 lose [1] 59/2
 lot [7] 14/21 17/12 18/21 36/13 52/14
 54/1 117/20
 love [1] 20/7
 LSR [2] 1/22 137/23
 lunch [1] 8/16
 lying [1] 48/2

M

M-c [1] 15/14
 made [10] 32/5 47/14 56/7 73/4 98/2
 100/14 112/23 116/5 132/25 136/21
 mail [20] 24/22 40/20 40/24 59/1 59/17
 60/5 60/11 60/15 60/19 60/21 60/23
 62/18 63/14 70/17 71/5 71/7 102/3

102/4 102/7 115/6
 mailed [3] 31/14 60/2 71/16
 mailing [1] 10/25
 mails [9] 10/24 21/13 40/11 59/2 59/15
 59/17 62/8 62/14 102/1
 main [4] 2/12 54/4 54/19 64/8
 major [2] 115/15 127/20
 make [12] 5/5 8/9 10/11 26/9 46/16
 47/6 52/16 53/10 73/6 90/23 99/8
 114/23
 makes [1] 101/14
 making [3] 56/20 104/16 121/17
 managed [1] 20/17
 manager [1] 19/5
 managing [6] 12/5 12/9 15/9 15/15
 15/20 17/25
 Manchester [1] 88/10
 mandate [2] 97/25 98/8
 Manhattan [1] 11/14
 manner [1] 113/2
 manners [1] 37/23
 MANNING [17] 1/15 4/3 6/1 10/20
 10/21 10/23 11/2 48/25 73/16 90/13
 111/5 135/4 135/12 136/3 136/18
 136/21 137/9
 MANNING-BAINER [10] 1/15 4/3 6/1
 10/20 135/4 135/12 136/3 136/18
 136/21 137/9
 many [6] 14/3 20/3 20/14 34/1 34/15
 98/17
 MARCH [10] 1/9 1/19 13/24 13/25 68/4
 68/8 68/12 88/20 135/6 137/7
 March 26th [3] 68/8 68/12 88/20
 marked [13] 4/1 6/18 6/21 6/24 7/2
 21/2 21/16 43/7 50/14 72/20 72/22
 73/9 106/25
 marketing [2] 14/21 14/21
 marks [1] 125/22
 married [2] 10/22 40/21
 match [2] 50/11 50/12
 matches [1] 73/6
 matching [1] 77/18
 materials [1] 14/21
 matter [11] 32/17 53/15 56/24 65/17
 97/3 98/3 100/14 100/20 104/19
 104/21 129/3
 matters [3] 54/25 61/17 64/25
 may [21] 12/12 12/13 15/9 15/15 15/19
 15/19 15/22 16/8 16/10 16/22 19/16
 29/9 31/17 62/6 89/21 97/1 98/23
 122/6 131/19 133/23 137/25
 maybe [7] 34/24 62/17 72/14 87/2
 88/15 89/7 117/10
 Mayor [1] 52/1
 McGuffey [5] 15/11 15/13 16/7 17/7
 18/2
 me [82] 10/23 10/25 14/12 15/23 18/4
 27/17 28/16 33/5 35/16 35/23 36/2
 36/13 36/21 36/24 37/1 37/2 37/25
 38/9 40/18 43/5 45/10 46/6 50/6 51/17
 53/12 53/12 54/7 58/20 58/25 59/23
 60/21 61/6 63/20 71/3 71/21 72/3 74/4
 75/1 75/2 75/3 75/18 76/1 76/8 76/11
 77/10 78/9 79/20 81/9 85/19 87/21
 88/16 89/13 89/18 93/14 94/22 98/23
 98/25 99/3 99/6 99/8 100/2 100/22
 107/4 111/2 111/8 111/25 112/1
 112/17 114/14 116/5 119/1 119/20
 127/1 127/11 128/21 128/21 130/10
 133/15 135/14 136/23 137/7 137/9

M
mean [21] 10/1 16/18 17/8 24/12 27/5
36/3 45/3 45/23 46/13 53/16 76/22
78/20 89/2 98/16 116/4 120/20 120/22
121/4 126/8 127/12 128/2
means [3] 33/14 57/22 58/9
media [10] 43/5 43/15 43/20 73/20
122/2 123/4 123/7 123/16 124/12
125/8
meet [5] 33/4 52/16 53/11 71/4 119/5
meeting [9] 87/13 87/16 87/21 98/21
114/7 118/23 132/17 133/19 133/23
meetings [2] 51/21 87/8
members [2] 87/15 87/22
memorandum [4] 68/7 68/12 88/21
88/24
memorializing [1] 30/15
memory [2] 76/17 81/12
mention [1] 125/11
mentioned [10] 25/18 39/23 50/19
50/20 53/20 63/8 80/2 101/23 127/14
130/3
Merit [2] 1/17 137/4
met [8] 6/13 14/14 34/10 34/10 65/11
68/15 98/21 114/9
MICHAEL [3] 1/9 102/19 102/22
might [9] 18/25 34/6 42/11 42/11 59/10
62/3 65/16 69/10 115/4
military [1] 14/15
mind [1] 105/2
minute [9] 79/18 82/24 83/10 83/17
84/17 85/9 86/1 89/21 94/24
minutes [5] 35/9 35/9 60/23 72/14
72/14
misconduct [2] 131/8 131/11
missing [1] 32/9
misunderstood [1] 65/22
Mm [3] 109/6 109/18 127/16
Mm-hmm [3] 109/6 109/18 127/16
moment [3] 17/7 67/20 72/7
Monell [3] 76/10 76/10 127/1
month [1] 12/17
months [2] 98/25 100/2
more [12] 12/17 35/9 49/15 54/10
56/20 58/13 60/18 62/25 63/1 63/3
72/15 119/6
morning [2] 6/10 6/11
most [4] 53/22 53/22 81/9 121/19
mother [1] 52/15
motive [1] 130/8
move [1] 5/7
moved [1] 34/23
moving [3] 29/24 32/21 74/14
Mr [3] 99/13 114/8 114/14
Mr. [121] 30/16 33/5 33/22 33/23 34/5
34/9 34/15 35/4 35/15 39/9 41/10
42/20 43/2 43/14 43/19 43/23 44/9
46/17 49/2 49/7 49/20 54/22 56/10
56/19 57/2 61/23 62/20 65/14 70/5
70/8 71/22 74/24 75/17 75/23 76/6
76/21 78/8 79/7 79/22 80/7 80/9 82/21
85/15 92/6 92/10 92/22 92/24 93/4
93/20 93/25 94/2 94/5 94/9 94/16
94/17 94/19 94/21 94/25 95/4 95/5
95/9 95/24 96/10 96/16 96/19 96/22
97/9 98/10 98/14 98/18 99/10 99/22
100/17 100/19 100/19 101/6 102/16
104/1 104/5 104/9 105/13 105/25 106/21
106/21 107/22 108/13 110/24 111/6
111/7 112/9 112/17 113/4 113/4 113/8

113/15 114/4 114/18 114/24 115/7
115/20 116/7 116/10 116/12 118/6
118/12 118/19 118/23 119/19 120/15
121/8 122/7 122/12 127/18 129/9
129/20 130/12 130/16 130/19 131/4
132/6 133/20 133/22
Mr. Peruta [94] 30/16 33/5 33/22 33/23
34/5 34/9 34/15 35/4 35/15 39/9 44/9
49/7 49/20 54/22 56/10 56/19 61/23
70/8 74/24 75/23 76/6 79/7 79/22 80/9
85/15 92/6 92/10 92/22 92/24 93/4
93/20 93/25 94/2 94/5 94/9 94/16
94/17 94/19 94/21 94/25 95/4 95/5
95/9 95/24 96/10 96/16 96/19 96/22
97/9 98/10 98/14 98/18 99/10 99/22
100/17 100/19 101/6 102/16 104/1
104/5 104/9 105/13 105/25 106/21
107/22 108/13 110/24 111/6 111/7
112/9 112/17 113/4 113/8 113/15
114/24 115/7 115/20 116/7 116/10
118/6 118/12 118/19 118/23 119/19
120/15 121/8 122/7 122/12 129/9
129/20 130/16 130/19 132/6 133/20
Mr. Peruta's [18] 41/10 42/20 43/2
43/14 43/19 43/23 46/17 49/2 62/20
65/14 70/5 71/22 75/17 76/21 78/8
80/7 82/21 100/19
Mr. Senick [2] 116/12 127/18
Mr. Spell [1] 57/2
Mr. Thibault [6] 113/4 114/4 114/18
130/12 131/4 133/22
Ms [17] 3/12 3/13 3/14 3/15 3/16 3/17
6/10 40/18 40/23 64/11 65/18 73/16
79/17 88/9 103/3 104/1 111/5
Ms. [24] 11/7 29/10 30/7 41/9 42/4
42/8 59/18 60/5 60/6 60/10 60/18
62/14 64/22 65/11 65/13 70/21 73/16
81/22 90/13 101/9 102/11 103/15
115/6 121/13
Ms. Bainer [3] 11/7 73/16 101/9
Ms. Borges [2] 65/11 65/13
Ms. Brazalovich [2] 30/7 103/15
Ms. Brazalovich's [2] 42/4 121/13
Ms. Ferraro [2] 29/10 42/8
Ms. Knight [10] 41/9 59/18 60/5 60/6
60/10 60/18 62/14 70/21 81/22 102/11
Ms. Manning [1] 90/13
Ms. Taylor [2] 64/22 115/6
much [1] 90/7
multiple [6] 40/14 40/15 60/24 78/23
93/3 96/23
murder [2] 62/11 62/11
my [94] 6/12 7/4 7/5 7/24 10/22 10/24
10/24 11/2 11/3 12/16 12/21 12/22
14/11 16/12 20/6 20/7 20/25 24/1 28/2
28/14 33/19 33/20 34/5 35/1 35/12
36/23 38/1 42/9 44/1 44/2 45/6 47/11
47/15 48/13 52/8 52/8 52/15 55/6 55/7
55/18 56/9 59/2 59/11 64/8 66/20
66/20 71/11 72/24 77/6 80/8 81/8
81/11 81/17 82/3 82/3 87/2 90/20 93/8
94/11 99/1 99/25 101/23 107/11
107/16 107/19 107/21 109/11 111/21
112/9 112/17 112/20 112/23 112/23
112/24 113/8 116/1 117/14 121/8
122/22 122/23 125/23 130/3 130/9
130/9 132/13 132/17 133/21 135/5
135/7 135/20 136/4 136/24 137/12
137/25
myself [2] 20/23 35/11

N
name [24] 6/12 10/16 10/24 11/3 11/3
14/16 15/23 27/12 32/22 40/17 40/19
42/4 42/7 42/10 42/11 61/1 64/2 66/10
71/16 74/17 87/19 90/16 102/16
112/10
named [4] 12/23 17/6 29/2 137/8
narrow [1] 125/23
Nathalie [1] 2/13
nature [3] 34/3 34/4 130/7
nearby [1] 97/18
necessarily [2] 21/23 119/10
neck [3] 39/16 95/18 108/21
need [10] 8/13 10/12 63/4 69/9 69/14
69/20 69/25 73/23 120/9 129/20
needed [9] 27/11 34/7 41/4 62/25 71/3
97/17 112/18 112/19 113/9
neglect [1] 124/25
negotiating [1] 12/21
neither [2] 56/13 137/15
network [1] 15/7
never [14] 62/24 66/7 68/1 68/8 68/15
69/23 122/21 123/11 123/21 124/11
125/6 126/25 127/10 128/11
Neville [1] 71/4
new [3] 12/21 21/23 73/6
news [4] 1/6 107/20 107/23 122/2
next [4] 28/17 32/22 43/18 91/22
Nicholson [2] 87/20 88/9
no [109] 1/6 1/22 4/4 7/7 7/18 8/21
12/19 13/1 14/9 14/11 16/2 16/2 16/2
16/19 17/18 22/16 25/12 25/14 25/18
33/15 33/19 35/11 38/18 39/23 41/17
41/17 43/13 43/21 44/6 45/6 47/15
47/15 48/18 48/20 55/6 55/15 58/4
58/9 61/22 62/16 63/10 65/12 65/24
66/7 67/18 67/19 68/6 68/10 68/13
68/19 70/13 76/15 79/3 82/1 82/15
85/5 85/9 91/9 91/12 91/19 91/21
92/11 93/23 94/1 94/20 95/12 96/21
96/25 97/10 101/13 101/21 102/14
102/17 103/14 106/12 107/11 107/16
107/21 110/8 113/16 113/19 113/21
115/1 116/8 116/9 118/8 119/4 119/4
119/24 120/22 120/25 121/25 122/4
122/10 122/14 123/3 123/6 125/17
126/8 128/11 129/5 129/15 129/17
129/23 130/14 130/17 130/20 130/23
133/25
No. [66] 21/6 21/14 21/17 22/2 22/8
22/10 22/14 22/23 23/5 23/9 25/9
25/23 27/3 27/20 27/20 29/17 29/17
29/24 30/2 30/6 30/12 30/22 31/3
31/10 32/10 32/21 35/3 35/20 39/11
39/12 41/14 41/22 41/24 42/2 42/5
42/13 44/7 47/20 48/22 48/23 49/6
49/23 50/19 53/13 53/14 54/20 56/3
56/15 57/4 59/5 59/16 90/22 91/22
95/14 97/20 100/12 104/10 106/20
107/25 109/15 115/20 121/18 122/7
122/13 122/13 123/1
No. 1 [12] 21/17 22/2 22/8 22/10 22/14
22/23 23/5 23/9 25/9 27/20 29/17
123/1
No. 11 [1] 27/20
No. 14-100 [3] 21/6 21/14 25/23
No. 2 [10] 29/24 30/2 30/6 30/12 30/22
31/3 31/10 32/10 90/22 104/10
No. 2014-1475 [1] 27/3
No. 3 [9] 32/21 35/3 35/20 39/11 39/12

N
No. 3... [4] 91/22 95/14 106/20 122/7
No. 4 [10] 41/14 41/22 41/24 42/2 42/5
42/13 44/7 47/20 107/25 122/13
No. 5 [19] 48/22 48/23 49/6 49/23
50/19 53/13 53/14 54/20 56/3 56/15
57/4 59/5 59/16 97/20 100/12 109/15
115/20 121/18 122/13
No. 6 [1] 29/17
none [2] 35/24 36/15
Norwalk [1] 11/16
Nos [1] 103/9
not [172]
notarized [6] 115/20 115/24 116/9
118/12 118/19 118/24
notary [7] 1/17 115/18 118/5 135/18
136/23 137/5 137/23
notations [1] 10/11
note [2] 4/8 44/21
noted [4] 7/20 30/2 46/6 135/8
notes [12] 16/19 33/16 33/18 33/19
33/20 33/21 114/23 122/18 122/21
122/22 122/23 123/2
nothing [5] 61/23 70/12 96/8 134/1
137/10
notice [5] 5/11 7/22 119/13 133/2 137/7
notification [1] 64/25
noting [1] 77/18
now [28] 10/19 12/22 13/15 18/24
28/23 29/9 42/13 44/7 47/5 47/16 48/5
48/16 50/25 54/8 56/19 56/23 56/24
59/4 59/15 70/15 76/24 100/4 104/6
105/7 109/15 110/23 115/10 133/12
nowhere [1] 93/6
number [14] 9/9 9/10 21/23 21/24
25/10 25/11 26/2 26/3 26/4 26/8 51/5
52/13 116/14 123/6
numbered [1] 49/10
numbering [1] 21/21
numbers [5] 22/1 38/23 77/16 78/16
78/21
numerous [2] 125/8 126/3

O
O'BRIEN [2] 1/9 68/11
oath [5] 6/5 116/22 117/3 136/21
137/11
objection [29] 23/23 27/6 31/5 39/1
44/11 44/12 45/20 45/22 46/20 46/21
49/24 68/25 86/13 119/2 119/22
119/23 121/6 121/7 122/9 122/15
122/20 123/9 123/18 123/20 123/23
123/24 124/4 126/21 133/7
objections [2] 5/5 5/8
observable [1] 46/7
observe [1] 47/5
observed [3] 46/6 47/12 48/4
Observer [5] 51/5 51/13 51/14 51/15
55/4
obtain [1] 79/21
obtained [7] 25/10 25/24 29/18 31/3
31/4 44/20 85/14
obviously [4] 16/19 19/12 61/12 119/12
occasion [1] 98/15
occasions [6] 34/1 89/6 89/7 114/10
126/3 130/5
occurring [1] 95/10
October [11] 12/1 59/6 59/16 60/6
60/15 60/19 97/21 100/12 102/3
132/16 133/19

October 19th [1] 132/16
October 20 [1] 100/12
October 20th [1] 59/6
October 21st [5] 59/16 60/6 60/15
60/19 102/3
of my [1] 135/7
of your [1] 100/5
off [17] 3/6 13/19 38/14 50/14 50/17
55/23 70/5 70/6 75/7 80/8 81/8 81/17
90/3 109/23 110/4 110/7 110/11
office [49] 2/11 7/5 11/17 12/6 12/16
12/20 15/20 16/8 16/13 19/3 19/5
19/19 22/20 22/21 22/25 25/13 28/2
28/14 28/19 33/5 34/5 35/1 35/12
39/24 55/18 64/5 64/10 64/13 64/14
64/21 64/22 65/2 65/3 72/24 91/10
99/1 101/17 111/3 111/4 113/12 115/2
117/14 128/24 131/18 131/23 131/25
132/1 132/3 133/5
officer [73] 27/14 27/16 27/23 28/1
39/15 40/8 40/15 41/13 44/9 44/22
45/8 46/8 46/25 47/5 47/13 47/17
47/18 48/5 48/9 48/10 48/15 49/21
56/17 56/20 56/21 56/25 57/2 57/6
57/25 59/20 59/24 60/2 60/11 60/22
60/24 62/8 62/15 63/7 63/13 70/18
81/24 82/2 84/25 93/7 93/25 94/2 94/5
95/17 95/20 95/25 96/1 96/2 96/3 96/6
96/7 96/11 96/12 102/12 102/16
104/13 104/17 105/5 105/15 106/1
108/10 108/20 108/24 109/1 110/13
110/18 121/1 124/25 125/3
officer's [4] 27/12 40/17 46/18 58/1
officers [25] 27/21 44/9 47/22 48/1
54/21 60/7 60/25 62/3 62/6 69/22
69/24 70/20 81/24 81/25 88/8 92/16
92/25 93/17 94/10 98/1 98/9 102/8
104/25 119/21 124/21
officers' [1] 61/24
offices [2] 1/18 11/15
official [1] 29/5
often [3] 19/20 54/11 124/21
oh [26] 10/4 10/8 16/14 19/3 20/6
24/14 25/17 31/8 38/12 39/7 40/7
52/13 58/9 58/22 59/13 67/1 77/5 77/6
78/4 79/3 90/1 111/6 123/4 131/5
131/9 131/16
okay [156]
omission [1] 3/6
once [3] 34/24 65/16 71/4
one [51] 10/19 14/3 18/15 18/22 22/13
24/21 30/9 34/2 44/21 49/15 50/12
53/19 54/20 56/20 56/20 57/18 57/23
58/13 63/15 63/21 74/6 74/23 77/2
77/3 77/11 77/12 77/21 78/14 78/14
78/21 78/22 78/24 78/25 79/1 79/3
80/10 80/10 80/13 81/8 87/10 89/7
98/20 98/23 104/13 104/13 104/23
107/5 107/6 108/25 112/9 125/2
one-page [1] 63/21
ongoing [7] 61/11 61/12 61/17 61/20
62/12 70/3 124/19
only [11] 25/14 27/11 62/16 80/13
89/17 89/21 95/20 98/14 102/7 117/16
126/15
onward [1] 74/14
open [6] 5/5 21/23 21/25 49/6 97/6
99/25
opinion [1] 101/3
opportunity [8] 67/22 79/17 83/4 93/2

118/11 119/17 122/8 122/12
opposed [1] 96/23
options [1] 57/13
or none [1] 36/15
ordered [3] 54/22 94/10 105/14
ordering [2] 93/7 93/20
orders [2] 95/21 124/16
ordinance [3] 86/8 86/10 86/10
ordinances [1] 42/23
organization [3] 129/13 129/25 130/15
organizations [1] 18/14
original [2] 4/8 128/25
originally [2] 34/22 135/7
originals [1] 129/4
other [51] 14/24 15/3 18/15 18/22
34/12 42/19 44/5 48/5 54/6 55/9 56/25
57/24 58/22 58/23 65/18 66/5 67/15
67/17 69/24 70/21 78/9 80/6 80/10
92/10 93/21 95/25 96/11 96/15 96/16
97/8 98/23 102/25 104/16 104/25
105/7 108/9 108/18 108/23 109/5
113/14 113/17 116/13 121/22 122/2
125/1 125/8 125/9 126/3 126/25
127/21 129/4
others [3] 18/15 58/11 127/9
otherwise [1] 105/13
our [20] 16/3 16/8 16/18 19/24 22/1
27/13 28/3 33/4 33/5 33/20 41/5 67/7
86/24 98/4 112/15 112/15 112/22
124/23 132/4 133/3
ourselves [1] 21/23
out [22] 5/7 6/13 28/17 28/22 30/12
31/2 31/20 34/20 35/18 36/12 43/5
45/14 54/7 54/16 78/11 78/22 81/23
89/23 112/23 116/15 116/20 116/24
outlets [1] 122/3
outlined [1] 50/7
outside [5] 43/14 62/14 69/14 69/16
106/25
over [16] 12/4 19/9 20/22 23/22 30/25
32/6 34/13 34/15 62/16 64/5 65/5
81/11 104/6 112/19 122/6 129/6
oversaw [2] 20/15 20/17
overseeing [1] 12/6
own [3] 17/11 26/23 47/2
owner [1] 66/12

P
p.m [4] 60/16 90/3 90/3 134/4
package [1] 29/13
page [63] 4/4 9/8 9/10 21/16 23/13
23/16 24/4 24/16 24/20 25/1 25/2 25/8
25/15 25/17 25/21 25/24 25/25 26/2
27/2 27/19 28/16 28/24 29/19 29/20
30/16 30/21 35/2 35/19 36/4 37/13
38/17 39/11 39/12 49/8 50/9 56/4 56/5
56/14 57/3 60/14 63/21 64/18 64/20
67/5 67/6 67/8 67/10 67/16 68/3 68/7
68/12 68/17 77/22 78/23 90/22 90/23
95/15 103/8 103/8 106/11 109/15
120/25 136/5
page three [1] 57/3
page two [3] 30/16 37/13 120/25
pages [10] 21/13 40/25 49/12 59/15
67/7 67/9 67/21 67/23 73/25 88/25
paid [1] 15/7
paper [1] 75/8
paragraph [12] 32/15 39/14 47/21
47/24 92/1 92/14 95/14 97/23 106/14
107/25 108/15 109/16

<p>P</p> <p>paragraphs [1] 104/3 parallel [2] 26/18 56/10 parcel [1] 106/4 Park [3] 55/10 55/16 79/7 part [14] 35/24 36/15 42/16 75/13 78/6 83/22 84/3 84/8 84/12 84/17 85/8 95/14 100/12 106/4 participant [1] 91/7 particular [17] 9/9 18/14 18/18 25/7 27/10 27/15 30/24 36/20 39/4 56/12 57/17 77/17 87/24 88/12 98/22 104/2 104/13 particularly [3] 54/15 92/16 119/13 parties [4] 5/13 69/16 137/17 137/19 partner [1] 14/11 party [3] 5/4 29/2 69/14 past [2] 8/16 71/4 Patricia [6] 1/17 1/22 135/23 136/25 137/4 137/23 patrol [2] 40/15 60/24 Paul [1] 14/17 Paused [18] 80/22 81/5 81/14 81/19 82/5 82/10 82/18 83/2 83/8 83/13 83/19 83/24 84/5 84/9 84/14 84/20 85/6 85/22 pay [1] 19/24 paychecks [1] 66/20 Pearl [1] 2/18 pen [3] 117/16 117/16 118/4 penalty [1] 117/7 people [8] 10/24 13/18 17/6 19/9 54/12 54/13 71/19 93/21 perception [1] 44/1 perform [2] 20/11 68/22 performed [6] 15/16 15/20 22/10 22/13 42/1 67/17 performed or [1] 22/13 performing [3] 16/7 16/12 34/17 perhaps [2] 73/5 117/23 perimeter [2] 108/9 108/24 period [5] 8/16 12/17 12/18 62/19 62/21 perjury [1] 117/7 person [20] 18/22 30/20 32/17 33/7 33/23 34/25 41/3 64/1 66/3 70/6 71/9 87/24 95/19 97/8 100/9 111/20 116/14 116/20 131/14 137/8 personally [5] 65/11 92/6 103/25 104/4 136/21 pertaining [2] 41/5 61/24 PERUTA [98] 1/6 30/16 33/5 33/22 33/23 34/5 34/9 34/15 35/4 35/15 39/9 44/9 49/7 49/20 54/22 56/10 56/19 61/23 70/8 74/24 75/23 76/6 79/7 79/22 80/9 85/15 92/6 92/10 92/22 92/24 93/4 93/20 93/25 94/2 94/5 94/9 94/16 94/17 94/19 94/21 94/25 95/4 95/5 95/9 95/24 96/10 96/16 96/19 96/22 97/9 98/10 98/14 98/18 99/10 99/13 99/22 100/17 100/19 101/6 102/16 104/1 104/5 104/9 105/13 105/25 106/21 107/22 108/13 110/24 111/6 111/7 112/9 112/17 113/4 113/8 113/15 114/5 114/8 114/24 115/7 115/20 116/7 116/10 118/6 118/12 118/19 118/23 119/19 120/15 121/8 122/7 122/12 129/9 129/20 130/16 130/19 132/6 133/20 Peruta's [18] 41/10 42/20 43/2 43/14</p>	<p>43/19 43/23 46/17 49/2 62/20 65/14 70/5 71/22 75/17 76/21 78/8 80/7 82/21 100/19 petitioner [1] 20/4 phone [16] 32/6 32/11 32/19 38/23 62/17 77/16 78/16 91/7 91/17 98/20 99/9 100/8 111/3 111/15 118/24 132/7 phones [1] 55/11 phonetic [2] 3/5 12/24 photocopy [1] 106/24 photographs [1] 81/24 phrase [1] 121/4 physically [1] 111/18 pick [3] 24/23 24/24 29/13 picked [5] 22/11 22/20 22/21 29/10 65/1 picking [1] 22/5 picture [2] 63/17 82/2 piece [1] 60/3 place [3] 32/10 85/12 104/24 placed [1] 94/3 plaintiff [6] 1/7 2/4 4/4 5/4 6/21 90/6 Plaintiff's [3] 24/16 29/17 48/21 Planning [1] 51/20 play [2] 72/8 79/9 played [20] 80/20 81/5 81/14 81/19 82/5 82/10 82/14 82/18 83/2 83/8 83/13 83/19 83/24 84/5 84/9 84/14 84/20 85/6 85/22 86/3 Playing [9] 73/21 74/12 74/21 75/10 75/20 76/3 76/12 76/18 79/15 plays [1] 79/11 please [5] 8/8 38/10 77/1 90/19 111/2 plus [1] 70/11 Plymouth [1] 51/24 point [12] 10/19 30/24 36/12 44/21 65/20 81/22 102/18 108/25 118/22 120/15 130/12 132/1 pointed [2] 28/22 31/2 pointing [2] 31/19 78/11 points [4] 30/17 31/2 71/8 90/25 police [38] 20/12 21/5 26/12 41/6 42/25 43/23 44/21 45/16 46/11 61/3 61/8 61/25 62/2 62/11 63/6 68/21 68/23 69/11 69/12 69/17 70/23 72/3 87/18 87/18 87/23 88/3 97/4 97/13 97/25 104/19 115/15 119/21 123/16 124/13 124/16 127/20 131/7 131/11 policies [6] 42/24 44/4 55/4 124/15 125/4 125/9 policy [17] 43/6 43/8 43/20 43/22 58/2 58/16 87/25 88/2 88/3 88/7 111/13 123/4 123/7 123/16 124/12 125/1 125/8 populates [1] 21/24 portion [4] 59/23 83/16 86/1 106/25 portrayed [1] 63/7 position [6] 12/22 17/25 40/23 45/19 46/17 130/13 positive [2] 18/5 99/19 possession [1] 129/5 possible [11] 28/13 37/7 59/13 63/23 74/25 75/3 75/19 75/25 99/18 100/9 115/8 possibly [2] 89/23 115/5 post [2] 52/8 52/9 post-high [2] 52/8 52/9 potential [1] 105/3 practice [2] 33/20 129/3 prefer [2] 11/19 122/3</p>	<p>prepared [1] 71/3 prerogative [1] 111/15 present [6] 35/10 87/14 92/9 93/21 99/20 114/12 presented [2] 56/10 105/12 Press [5] 51/6 51/8 51/23 52/23 55/3 pretty [2] 17/13 59/3 prevented [1] 46/23 preventing [1] 8/10 previous [5] 67/23 89/9 89/11 107/1 114/10 previously [2] 88/25 97/2 primarily [1] 19/15 primary [2] 18/21 64/8 principle [1] 66/12 printed [3] 9/2 35/18 75/7 printed-out [1] 35/18 prior [7] 33/23 34/14 38/24 93/14 114/7 121/17 133/20 private [6] 11/13 12/20 14/13 17/11 19/12 19/22 Prob [1] 59/10 probable [2] 75/3 75/25 probably [8] 32/9 43/3 51/18 59/19 59/21 59/25 71/18 86/19 procedure [9] 1/18 19/8 21/20 21/21 58/3 58/17 88/1 88/2 88/5 procedures [7] 42/24 44/4 55/5 87/24 124/15 125/5 125/9 proceed [1] 26/15 proceeds [1] 28/9 process [6] 7/14 12/15 19/10 86/16 96/20 100/23 processed [1] 87/5 professional [1] 67/12 professor [1] 88/9 project [2] 15/6 15/8 promulgated [1] 124/13 proof [1] 5/13 property [1] 107/20 proprietary [1] 21/22 protects [1] 113/2 provide [10] 9/17 23/3 40/14 41/7 41/10 61/9 79/22 106/16 130/8 130/15 provided [36] 3/5 9/3 22/7 35/16 35/21 36/1 36/24 37/1 37/14 37/25 38/9 39/17 41/12 46/5 58/20 58/25 60/18 67/17 72/3 74/24 76/6 80/9 81/9 85/19 89/13 89/18 92/2 93/3 94/17 96/5 96/15 106/8 106/21 122/7 122/12 129/9 provides [1] 128/22 public [9] 1/17 19/19 54/7 54/8 54/16 135/18 136/23 137/5 137/23 pull [2] 43/5 126/10 purpose [4] 87/12 111/24 124/18 124/19 purposes [2] 11/20 72/25 pursuant [2] 1/18 137/7 pursue [1] 14/14 Pursuit [1] 66/25 push [1] 71/4 pushing [2] 85/1 93/17 put [11] 9/8 41/23 42/6 45/13 46/10 47/2 71/21 95/4 117/24 124/22 125/20</p> <p>Q</p> <p>qualified [1] 137/5 question [15] 5/6 5/9 8/9 13/7 23/25 31/9 41/20 43/19 66/24 69/1 69/7</p>
--	---	--

<p>Q</p> <p>question... [4] 109/4 120/7 120/8 131/20</p> <p>questioning [1] 90/7</p> <p>questions [16] 8/7 8/20 79/5 87/15 89/25 90/18 91/25 92/13 103/1 103/3 113/22 120/11 128/13 128/14 133/11 133/25</p> <p>quick [3] 55/19 91/25 128/14</p> <p>quite [2] 9/13 9/15</p> <p>quotation [1] 125/22</p> <p>quote [2] 92/18 95/21</p>	<p>92/21 93/8</p> <p>record [15] 16/11 29/2 29/7 38/14 55/23 55/25 72/17 77/7 82/12 90/3 90/5 91/10 91/13 103/18 137/13</p> <p>recorded [3] 7/21 33/13 91/20</p> <p>recording [5] 7/22 8/3 72/2 92/2 106/16</p> <p>recordings [3] 69/19 71/17 106/21</p> <p>records [7] 23/4 23/8 35/13 61/3 61/9 61/12 103/12</p> <p>Recross [2] 3/16 128/16</p> <p>Recross-Examination [2] 3/16 128/16</p> <p>Redirect [4] 3/15 3/17 114/1 131/1</p> <p>reduced [1] 137/12</p> <p>refer [4] 40/21 86/14 116/4 119/9</p> <p>reference [1] 47/20</p> <p>referenced [4] 13/16 30/3 62/8 63/8</p> <p>references [1] 101/14</p> <p>referencing [1] 88/3</p> <p>Referral [1] 64/21</p> <p>referring [9] 23/13 25/17 25/19 27/19 37/11 49/10 59/14 108/14 115/25</p> <p>reflected [3] 27/2 86/8 104/9</p> <p>refused [1] 109/24</p> <p>regard [8] 21/4 27/1 43/19 43/23 62/20 86/23 88/17 128/19</p> <p>regarding [11] 23/19 41/10 49/1 52/1 57/4 61/3 65/20 66/3 75/23 97/17 102/23</p> <p>regardless [1] 100/21</p> <p>Registered [2] 1/17 137/4</p> <p>regular [1] 86/20</p> <p>regularly [1] 86/14</p> <p>relate [1] 42/23</p> <p>related [16] 21/14 24/9 35/14 61/9 61/17 66/22 68/21 68/23 70/3 70/13 76/6 76/21 82/21 122/18 125/5 137/16</p> <p>relation [2] 43/11 129/8</p> <p>Relations [8] 64/10 64/13 64/21 64/23 65/2 65/4 131/23 132/1</p> <p>relative [1] 137/18</p> <p>relevant [1] 70/12</p> <p>relied [2] 50/7 103/23</p> <p>relinquish [1] 12/16</p> <p>rely [9] 49/19 86/10 86/19 123/10 123/16 124/10 124/15 124/20 125/1</p> <p>remained [1] 12/4</p> <p>remember [11] 16/14 16/22 19/4 25/6 38/8 45/12 71/16 76/10 78/5 80/21 111/7</p> <p>render [1] 127/6</p> <p>rendered [1] 67/13</p> <p>renew [1] 14/2</p> <p>repeat [1] 23/7</p> <p>repeatedly [1] 109/24</p> <p>repeating [1] 92/12</p> <p>rephrase [1] 128/21</p> <p>replaced [2] 15/9 123/12</p> <p>Replaying [1] 77/4</p> <p>report [106] 20/21 21/17 21/25 22/2 22/8 22/10 22/14 22/23 23/1 23/5 23/9 25/8 27/13 27/20 29/17 29/24 30/2 30/6 30/12 30/15 30/22 31/3 31/10 32/5 32/10 32/21 33/20 35/3 35/20 36/23 37/13 39/11 39/12 39/12 41/6 41/14 41/22 41/23 42/2 42/5 42/7 42/13 44/7 44/14 47/11 47/20 47/25 48/21 48/22 49/1 49/3 49/6 49/23 50/19 53/13 53/14 54/20 56/3 56/14 57/3 59/4 59/4 59/5 59/9 59/16 59/21 59/21 59/25 61/19 67/25 69/12 70/16</p>	<p>86/22 86/25 87/3 90/22 91/22 91/23 94/12 95/13 97/20 97/21 100/11 101/14 101/24 103/9 103/22 104/9 106/11 106/20 107/25 109/15 110/25 112/23 115/19 115/25 116/3 120/24 121/10 121/13 121/18 122/7 122/13 122/13 124/23 127/15</p> <p>reporter [14] 1/17 4/8 6/4 7/25 9/22 15/24 51/7 51/10 120/6 120/12 124/5 135/23 136/25 137/4</p> <p>REPORTER'S [1] 4/8</p> <p>Reporting [1] 1/23</p> <p>reports [28] 20/18 21/13 21/21 21/24 22/1 41/4 61/3 65/6 69/17 69/18 86/24 87/4 89/4 89/6 90/16 90/20 90/21 97/4 104/24 113/1 115/19 122/25 123/1 128/24 129/2 131/18 131/23 132/4</p> <p>represent [1] 20/2</p> <p>representation [1] 34/8</p> <p>representative [1] 7/5</p> <p>representatives [1] 69/23</p> <p>represented [1] 69/22</p> <p>REPRESENTING [3] 2/4 2/10 2/16</p> <p>request [12] 26/8 26/9 61/2 70/1 112/11 112/21 129/10 129/12 129/14 129/19 129/22 130/16</p> <p>requested [7] 69/15 71/17 89/17 120/11 124/4 125/7 125/8</p> <p>requesting [1] 40/12</p> <p>requests [1] 71/11</p> <p>require [1] 125/15</p> <p>rescinded [2] 123/8 123/12</p> <p>research [10] 42/14 42/17 42/21 101/15 101/20 101/21 126/4 126/7 126/14 128/5</p> <p>researched [1] 106/8</p> <p>researching [1] 42/22</p> <p>reserves [1] 5/4</p> <p>reserving [1] 5/7</p> <p>residence [2] 113/5 114/7</p> <p>resolution [1] 20/25</p> <p>respect [8] 37/3 43/1 43/2 68/1 71/11 89/15 125/9 130/10</p> <p>Respectfully [1] 118/17</p> <p>respond [2] 69/6 129/14</p> <p>responded [2] 40/16 60/24</p> <p>responding [1] 8/11</p> <p>response [1] 130/16</p> <p>responsibilities [1] 12/3</p> <p>responsible [1] 20/17</p> <p>restrooms [1] 8/15</p> <p>retain [1] 122/21</p> <p>retained [2] 4/8 122/21</p> <p>retired [1] 115/15</p> <p>return [1] 128/25</p> <p>returned [1] 12/19</p> <p>review [46] 20/9 20/12 22/19 24/10 31/25 32/2 33/20 34/17 42/17 43/20 50/2 64/7 65/21 68/24 79/18 86/12 86/16 87/3 87/7 87/13 87/14 87/16 87/22 88/13 89/22 93/2 94/19 99/15 99/18 111/12 112/3 117/4 118/12 119/18 119/18 122/19 126/5 126/6 132/10 132/12 132/15 132/17 132/18 132/21 132/23 133/18</p> <p>reviewed [6] 31/15 31/25 43/22 86/7 94/17 99/19</p> <p>reviewing [3] 20/18 44/20 121/9</p> <p>rharris [1] 2/20</p> <p>right [57] 5/5 5/7 7/8 7/9 7/24 10/7</p>
<p>R</p> <p>Rachel [4] 1/18 2/5 2/7 6/12</p> <p>Rachel's [1] 92/13</p> <p>rachelbairdlaw.com [1] 2/8</p> <p>raising [1] 52/15</p> <p>raw [1] 107/12</p> <p>rbaird [1] 2/8</p> <p>reached [2] 34/20 34/20</p> <p>read [20] 5/17 8/23 9/4 10/2 10/10 44/17 92/19 95/16 95/22 112/23 116/24 117/1 120/7 120/9 120/11 121/13 123/22 124/4 131/19 135/4</p> <p>reading [9] 3/6 17/3 36/25 38/8 86/18 90/15 117/2 117/9 117/22</p> <p>real [3] 44/24 45/15 46/11</p> <p>reality [1] 13/18</p> <p>realized [3] 59/19 59/22 60/1</p> <p>really [25] 14/25 16/14 19/9 34/6 34/19 35/8 36/1 36/19 36/19 44/4 52/15 53/11 55/6 61/22 66/21 69/24 85/16 86/24 86/25 87/11 88/11 98/24 119/10 125/24 126/14</p> <p>reason [16] 17/2 28/3 32/25 33/3 40/1 40/2 44/25 45/7 45/16 46/11 46/24 61/22 70/13 119/4 126/2 136/5</p> <p>reasons [2] 53/15 53/18</p> <p>Rebecca [1] 2/20</p> <p>recall [62] 16/16 17/6 28/10 34/6 35/8 36/1 36/14 36/25 45/11 48/4 56/24 60/10 60/12 63/24 63/24 63/25 71/25 75/9 77/20 79/6 79/8 80/2 80/5 80/6 80/9 80/12 80/13 80/16 80/23 81/1 81/7 81/8 81/16 81/17 81/20 82/7 82/20 83/15 83/21 84/2 84/7 84/11 84/16 84/22 84/23 85/8 85/24 86/5 86/6 86/18 87/16 88/16 89/2 94/4 94/7 96/18 100/3 100/6 100/8 100/10 115/9 128/9</p> <p>recalled [1] 18/23</p> <p>recalling [1] 38/2</p> <p>receipt [1] 107/2</p> <p>receive [5] 7/3 25/6 26/4 78/7 128/20</p> <p>received [15] 22/20 24/8 24/12 24/21 25/3 28/11 69/18 75/16 75/23 76/21 78/15 78/22 79/1 104/4 126/22</p> <p>received and [1] 22/20</p> <p>receives [1] 133/2</p> <p>receiving [6] 23/19 60/10 77/20 78/5 79/6 79/8</p> <p>recently [1] 89/8</p> <p>recognize [22] 67/22 73/19 73/25 74/15 74/16 74/16 74/23 74/25 75/1 75/6 75/12 75/15 75/22 75/24 76/5 76/7 76/14 76/15 76/20 79/11 79/19 107/2</p> <p>recognized [2] 34/12 131/13</p> <p>recollection [11] 36/20 38/2 47/15 48/13 76/9 85/10 85/12 85/17 85/18</p>		

R
 right... [51] 10/13 12/22 16/21 19/13
 21/17 28/24 36/10 37/16 38/5 38/10
 41/19 48/23 50/23 56/17 58/7 73/8
 73/13 76/2 77/14 82/15 83/5 85/12
 91/25 92/9 92/24 93/14 93/14 93/23
 94/9 94/14 95/3 95/7 95/13 95/24
 96/14 97/16 100/4 101/19 102/7
 102/11 104/6 105/7 105/24 106/11
 107/17 109/21 110/12 113/20 118/7
 123/2 123/5
 right-hand [1] 21/17
 rights [6] 49/22 57/8 95/19 105/3
 126/24 127/8
 RMR [2] 1/22 137/23
 RNC [1] 1/6
 Road [3] 1/19 1/23 2/5
 Robert [1] 71/6
 role [2] 86/11 98/4
 room [2] 7/19 35/12
 Rossi [1] 14/17
 routinely [1] 63/1
 ROVELLA [4] 1/9 2/10 29/3 123/15
 Rovella's [1] 120/7
 Rules [1] 1/18
 running [1] 12/16
 Russ [5] 6/2 11/18 15/21 18/12 106/15

S
 S.S.I [1] 89/12
 sabbatical [1] 53/9
 said [45] 3/4 27/17 32/19 39/8 39/15
 39/18 39/19 45/8 45/12 45/13 45/15
 46/22 47/7 48/8 56/23 56/24 84/25
 92/1 93/9 93/22 95/17 96/2 99/2
 100/22 110/23 111/4 111/5 111/6
 111/6 111/13 111/14 112/17 112/18
 113/9 113/11 118/21 119/11 120/19
 121/20 123/23 123/24 128/3 129/16
 129/17 136/20
 sales [1] 14/22
 same [10] 25/5 26/16 66/9 77/12 77/16
 78/11 78/15 78/16 78/17 122/15
 Sandra [1] 65/7
 saw [7] 36/1 46/6 47/9 85/18 89/3 93/9
 118/18
 say [48] 7/9 12/10 15/16 17/8 19/17
 22/2 22/21 25/14 28/13 31/1 35/19
 36/21 38/6 39/18 41/15 43/3 43/25
 51/12 52/2 53/16 56/7 59/8 78/14
 85/17 88/15 94/4 94/7 95/16 95/24
 104/8 105/9 105/24 106/3 107/3
 110/16 114/20 116/18 117/21 118/22
 118/25 119/14 119/19 120/18 122/25
 130/2 131/6 131/10 131/13
 saying [16] 44/22 45/7 46/3 46/10 47/3
 60/11 60/22 60/23 65/25 73/11 78/7
 94/8 105/21 109/1 121/1 126/23
 says [13] 29/22 37/14 38/22 40/15
 47/11 64/20 65/3 90/24 97/24 100/13
 107/12 107/17 118/20
 scene [18] 46/23 54/6 54/9 54/15 55/10
 55/13 55/14 62/4 62/6 85/1 85/3 93/17
 97/13 108/9 108/24 110/15 110/18
 121/24
 scenes [3] 55/5 55/7 121/24
 scheduled [3] 30/21 32/17 34/22
 Schissel [5] 13/1 13/2 66/10 66/11
 66/12
 Schisselle [1] 12/24

Schlüssel [1] 12/25
 Scholar [5] 101/23 101/24 125/11
 125/18 125/23
 scholarly [1] 125/20
 school [8] 52/6 52/7 52/8 52/9 52/12
 52/20 101/12 121/21
 scope [2] 56/8 133/16
 screen [2] 78/6 82/2
 screen-shot [1] 82/2
 SEAN [2] 1/9 56/23
 search [5] 125/13 125/21 125/22 126/9
 126/13
 searches [1] 125/13
 searching [1] 125/21
 season [4] 13/24 14/1 14/2 14/3
 second [33] 24/25 25/15 25/20 32/15
 35/19 36/4 47/21 47/23 47/24 56/4
 56/4 67/7 67/8 67/10 67/15 79/18
 82/24 83/10 83/17 84/17 85/9 86/1
 88/24 90/22 97/23 100/11 100/13
 103/8 108/8 108/16 108/22 109/4
 109/15
 secondary [2] 85/1 85/3
 seconds [1] 60/16
 section [4] 86/8 90/25 106/14 124/23
 security [11] 6/2 11/11 11/12 11/13
 66/17 66/19 66/21 103/12 103/20
 112/10 113/1
 Security's [1] 112/14
 see [37] 21/6 21/17 24/6 25/15 25/19
 27/11 32/14 35/23 36/6 41/6 41/19
 46/6 47/22 57/19 60/12 72/7 73/24
 74/4 80/16 83/4 85/19 89/3 89/6
 105/12 105/15 105/16 106/6 107/7
 107/12 109/19 109/24 110/6 113/13
 117/23 118/21 119/19 133/15
 seeing [6] 10/25 80/18 80/21 81/2
 81/16 82/7
 seeking [2] 97/25 98/8
 seem [2] 48/1 49/23
 seemed [2] 40/1 56/22
 seems [2] 24/1 50/14
 seen [21] 35/24 43/8 43/16 46/25 48/8
 63/22 67/4 67/6 67/9 67/23 68/1 68/5
 68/8 68/18 80/11 86/15 88/23 123/11
 124/11 124/12 130/4
 segment [1] 83/9
 seized [3] 69/11 69/14 69/15
 seizure [2] 126/9 126/13
 seminars [1] 128/10
 send [3] 27/15 63/19 128/9
 Senick [3] 115/16 116/12 127/18
 sent [12] 40/11 45/10 59/17 59/17
 59/22 60/6 60/19 60/21 87/4 102/4
 115/6 128/11
 sentence [10] 3/7 92/15 92/19 100/13
 106/19 108/8 108/16 108/22 109/4
 110/16
 September [13] 17/9 22/8 24/5 30/24
 33/9 33/23 34/10 35/4 55/14 72/6
 94/16 106/20 112/8
 September 16 [1] 24/5
 September 17th [1] 22/8
 September 2014 [1] 17/9
 September 24th [8] 30/24 33/9 33/23
 34/10 35/4 72/6 94/16 106/20
 Sergeant [5] 47/16 48/5 48/8 48/16
 48/16
 series [2] 90/25 96/14
 served [2] 19/10 65/20

Service [1] 1/23
 services [7] 6/2 11/11 11/12 67/12
 67/17 103/20 112/10
 Services' [1] 103/12
 set [3] 98/21 99/9 133/11
 several [7] 53/15 53/18 53/19 98/25
 105/10 110/8 130/5
 she [67] 10/2 13/7 16/3 16/3 16/8
 16/12 17/7 17/10 17/10 17/10 17/13
 17/14 17/16 18/2 18/5 18/7 18/25
 18/25 19/3 19/3 19/4 19/5 19/6 19/7
 19/9 19/9 22/25 22/25 23/1 23/1 28/3
 28/20 30/8 31/14 31/15 31/25 32/1
 32/2 32/3 32/7 32/19 33/5 37/13 40/3
 40/3 40/6 40/7 40/13 40/15 40/21 41/3
 41/6 41/12 41/13 41/16 60/1 60/3
 60/21 65/10 71/3 87/19 87/21 88/10
 88/12 121/10 123/10 137/10
 she's [5] 16/13 17/22 64/8 64/24 123/9
 sheet [8] 9/7 9/12 17/2 22/7 29/14 50/8
 135/9 136/1
 Shepardized [1] 125/24
 shift [1] 125/4
 shirt [10] 39/16 40/10 95/18 96/1 96/3
 96/12 102/13 104/14 105/4 108/20
 shooting [3] 40/16 60/25 79/10
 short [1] 83/5
 shot [1] 82/2
 should [5] 6/18 22/11 39/18 73/5 95/16
 show [14] 6/16 12/14 13/15 13/18
 13/22 14/7 14/12 14/25 15/3 73/1
 80/15 87/23 106/24 108/19
 showed [4] 75/1 75/2 76/8 78/9
 showing [2] 43/7 63/7
 shown [1] 123/4
 shut [3] 109/23 110/4 110/7
 sic [1] 3/4
 side [1] 107/17
 sign [7] 5/17 8/23 10/3 24/24 26/4
 116/21 117/5
 signed [5] 25/5 28/14 76/22 78/24
 118/4
 signings [1] 130/6
 signs [1] 117/16
 similar [1] 123/1
 simple [1] 126/22
 simplistically [1] 126/23
 simply [1] 98/4
 since [15] 12/1 13/16 17/22 17/23
 24/10 26/19 47/8 64/5 65/18 65/19
 70/22 87/6 97/6 112/15 132/21
 single [1] 52/15
 site [2] 16/1 16/3
 sitting [2] 16/19 67/11
 situation [1] 106/9
 skip [1] 81/10
 snitches [1] 54/12
 so [155]
 sold [1] 15/7
 some [21] 8/15 19/7 30/19 31/16 35/20
 53/10 56/7 58/16 69/10 71/2 74/1
 88/10 92/12 97/1 101/15 102/18
 112/23 129/24 130/6 130/24 132/1
 somebody [2] 9/14 54/19
 someone [4] 63/5 71/13 99/1 105/17
 someone's [1] 127/8
 something [11] 9/21 37/2 38/2 61/18
 87/2 98/10 100/17 111/7 117/9 119/11
 128/4
 sometime [1] 110/24

S
sometimes [1] 37/22
sorry [24] 16/3 23/7 27/18 27/18 31/7
31/21 40/19 47/23 50/5 51/11 61/15
65/22 66/8 76/25 78/3 90/13 91/3
98/16 105/8 108/14 108/17 115/25
128/2 128/21
sort [2] 125/22 129/24
sounds [1] 17/24
source [2] 23/4 23/8
Southington [5] 51/5 51/12 51/14 51/15
55/4
speak [8] 13/19 19/9 62/25 98/14 98/17
99/24 112/18 113/10
speaking [5] 69/8 111/19 118/10
128/22 133/1
specific [8] 5/5 18/19 20/1 62/19 62/21
76/9 125/19 128/10
specifically [19] 51/20 61/17 69/20
84/23 85/11 86/6 86/14 87/1 87/15
91/15 92/24 102/12 102/23 110/10
118/21 119/14 124/22 125/18 126/7
spectators [3] 108/9 108/23 109/5
speculating [1] 36/14
spell [10] 1/9 15/23 47/16 47/17 48/6
48/8 48/16 48/17 56/23 57/2
spelling [1] 3/5
spoke [2] 34/24 102/15
spoken [4] 62/16 68/15 70/22 101/5
squash [1] 100/25
Ss [1] 137/1
staff [3] 16/24 51/6 51/10
stands [1] 66/23
started [8] 17/23 17/24 18/25 18/25
59/11 65/25 71/1 86/17
starting [1] 109/16
starts [2] 108/18 109/4
state [14] 1/17 12/7 12/8 19/20 19/23
19/24 115/15 121/1 123/15 125/18
127/18 127/20 137/1 137/6
State of [1] 1/17
stated [6] 32/20 45/19 90/24 101/3
102/18 118/18
statement [23] 47/6 47/14 93/23
108/12 115/17 116/4 116/5 116/6
116/9 116/15 116/17 116/20 116/23
117/4 117/9 117/18 117/20 117/22
118/12 118/19 118/24 119/24 127/17
statements [8] 32/5 98/7 104/8 115/11
116/4 116/13 116/14 118/8
states [6] 1/2 27/23 30/13 95/15 102/7
106/15
station [1] 69/11
stations [1] 122/2
stay [2] 54/2 99/6
steady [1] 96/24
stenographic [2] 7/21 7/24
step [1] 12/15
stick [1] 100/4
sticking [1] 24/20
still [14] 12/18 14/1 16/8 31/8 33/18
41/16 59/2 61/12 64/18 64/22 88/17
95/13 99/25 123/4
stipulated [4] 5/3 5/10 5/12 5/16
stop [36] 44/25 45/8 45/16 46/12 47/18
48/10 54/22 57/1 92/17 92/17 92/25
93/7 93/25 94/10 95/20 95/25 96/3
96/7 105/10 105/14 105/21 106/1
108/11 108/25 109/13 110/11 118/20
119/1 119/14 119/21 120/7 120/16

120/19 120/21 120/22 133/5
Stopped [1] 86/3
straight [4] 44/2 78/22 120/5 126/11
straight-up [1] 44/2
stream [1] 96/24
street [10] 2/12 2/18 6/3 11/18 15/21
18/13 44/10 48/3 55/10 79/7
Streets [1] 55/17
strict [2] 126/16 126/18
strike [2] 5/7 53/12
structure [1] 66/22
studying [1] 52/17
stuff [1] 81/11
subcontracting [2] 17/12 18/8
subcontractor [1] 17/1
subcontractors [1] 16/25
subject [2] 60/7 102/8
submit [5] 86/24 112/12 127/11 128/23
131/18
submitted [4] 36/22 79/4 110/25 131/22
subpoena [5] 4/5 6/17 7/3 21/2 21/7
Subscribed [1] 135/14
subscription [1] 125/15
subsequent [2] 24/17 95/7
such [3] 5/8 27/13 70/4
sue [1] 129/25
sued [1] 29/4
summarized [1] 37/23
summary [7] 38/2 49/4 59/5 103/23
108/12 121/17 121/18
summer [3] 11/4 12/5 12/11
superior [1] 130/13
supervision [1] 137/12
supplied [1] 129/1
support [6] 20/20 37/17 39/6 92/3
106/17 126/3
supported [3] 37/4 40/4 106/1
Supporting [1] 74/10
supportive [1] 56/11
supports [3] 57/16 98/5 127/4
supposed [1] 13/12
Supreme [5] 98/3 100/15 100/21 101/1
101/2
sure [40] 6/25 7/11 8/9 9/15 9/18 11/24
16/23 17/5 34/19 34/23 36/22 37/6
37/10 37/25 38/6 41/1 41/21 45/7
45/23 51/1 53/10 55/2 55/12 56/14
59/2 61/25 64/16 65/5 65/22 66/21
73/6 77/2 85/17 87/11 90/23 98/24
99/8 99/24 113/11 129/16
sustain [5] 57/15 57/18 57/18 57/20
57/24
sustained [2] 57/11 57/22
SVCS [1] 1/6
swear [3] 116/22 116/23 117/3
swore [1] 117/3
sworn [4] 6/4 115/18 135/14 137/9
synopsis [4] 37/3 38/9 59/12 116/1
system [1] 22/12

T
T-shirt [8] 39/16 40/10 96/1 96/3 96/12
102/13 104/14 105/4
tactics [1] 87/24
take [22] 19/22 33/16 35/6 36/18 37/9
38/10 55/11 55/19 67/20 89/19 89/20
94/6 98/3 100/14 100/20 101/1 115/17
115/18 116/14 118/8 120/20 121/24
taken [9] 1/17 5/14 28/20 35/3 69/10
82/22 103/14 116/4 137/17

taking [5] 49/18 85/11 115/10 116/13
127/17
talk [5] 19/11 34/15 50/24 97/8 112/2
talked [1] 71/5
talking [1] 108/21
tape [3] 93/18 108/9 108/24
targeted [2] 108/10 108/24
tasked [1] 12/6
Tattersall [1] 16/11
taught [2] 88/7 117/23
Taylor [9] 64/2 64/11 64/22 65/18 66/5
72/19 72/19 115/4 115/6
technique [2] 117/21 118/6
techniques [1] 127/22
tee [2] 95/18 108/20
teeth [1] 20/6
telephone [4] 34/14 34/16 34/24 103/14
tell [20] 13/12 13/12 25/2 47/18 48/9
92/16 92/24 93/7 93/25 94/2 94/9 96/7
96/10 98/12 111/2 111/8 117/1 117/8
119/1 120/15
telling [5] 46/8 46/25 48/9 56/25 105/17
terminology [1] 50/1
terms [5] 18/17 20/20 57/13 125/21
125/22
testified [7] 6/5 7/16 80/11 113/18
123/10 124/10 132/8
testify [3] 6/17 21/4 137/9
testimony [11] 28/8 30/3 54/14 54/18
80/1 81/1 106/7 123/15 124/9 135/5
137/13
text [3] 45/13 46/9 47/2
than [19] 12/17 14/24 35/9 44/5 48/5
56/20 60/19 65/18 66/5 67/15 69/24
70/21 72/15 92/10 95/25 96/11 96/16
97/8 113/18
thank [14] 8/19 8/24 8/24 11/6 11/8
37/8 50/18 56/1 89/24 90/7 91/5 102/9
128/13 134/2
Thanks [4] 7/1 37/10 90/8 130/21
that [668]
that I [1] 115/5
That might [1] 42/11
that pursuant [1] 137/7
that's [86] 6/24 7/2 8/3 9/19 11/2 14/14
17/2 20/7 23/9 26/21 29/6 29/20 30/2
30/11 35/5 35/22 39/21 46/22 46/22
47/11 48/13 48/23 48/24 50/9 50/16
52/8 53/7 54/16 54/23 55/21 57/12
59/8 61/8 61/13 62/5 65/24 66/15 68/4
72/22 76/22 77/18 77/21 78/6 78/17
79/20 80/25 85/25 87/25 89/2 89/5
90/14 91/6 92/8 93/13 94/11 95/3
95/23 97/15 97/19 101/11 102/4
102/10 103/21 104/11 105/1 106/3
106/23 107/11 107/16 107/19 107/21
108/7 109/9 110/19 110/20 111/14
115/22 115/22 116/11 118/14 119/7
123/2 127/11 129/7 130/21 131/21
the action [1] 137/17
their [12] 22/7 26/3 26/23 54/14 54/18
58/23 65/4 90/6 94/3 117/6 117/24
119/9
them [37] 8/8 10/25 13/21 13/21 16/18
20/15 20/17 20/20 21/23 22/1 24/24
24/24 26/24 26/25 27/16 36/25 38/9
51/16 58/5 59/3 63/7 66/9 80/18 81/10
97/5 97/13 113/2 116/24 117/1 117/3
117/3 117/8 117/15 117/18 117/22
119/6 125/25

T
themselves [3] 116/15 116/21 117/20
then [63] 12/19 13/20 14/14 18/19 19/8
21/13 24/25 25/23 26/15 28/12 30/19
31/1 31/15 32/21 33/21 34/23 34/24
34/25 39/8 42/8 42/9 45/10 46/9 47/1
48/10 52/1 54/17 56/14 57/3 57/20
59/12 59/24 60/14 60/22 61/18 68/7
68/17 71/6 71/11 71/13 76/23 79/10
81/9 87/5 89/12 89/22 90/24 95/13
101/22 105/24 105/24 112/24 114/22
116/24 117/5 117/12 117/14 118/4
124/1 125/20 129/8 132/1 132/3
there [85] 8/2 8/9 9/2 16/19 16/23 17/7
17/14 17/16 18/2 18/7 19/5 19/11
19/15 20/22 21/20 21/25 26/7 28/2
30/16 30/20 32/10 32/10 32/25 33/2
40/1 40/14 40/15 41/5 41/22 45/13
46/9 46/10 50/15 55/9 56/8 57/23 58/4
61/23 62/2 62/17 62/19 62/20 65/7
66/1 67/16 67/16 70/12 70/12 71/1
71/8 72/16 72/17 74/4 77/18 81/24
82/15 82/16 84/25 89/5 89/7 94/23
95/24 96/8 97/24 108/8 108/18 108/23
109/4 109/4 116/6 116/9 116/13 117/5
117/10 117/13 117/15 118/18 120/4
120/8 123/5 124/1 125/2 131/22 133/4
137/7
there's [28] 9/7 14/11 16/25 18/22
19/14 19/20 26/1 54/11 57/19 58/8
58/8 58/9 58/13 61/22 68/7 69/10
69/12 70/13 71/13 72/15 78/23 90/24
93/16 107/7 117/9 124/20 126/8
133/15
thereafter [1] 86/19
thereto [1] 5/6
thereupon [1] 137/10
these [13] 32/5 36/20 36/25 49/10
59/17 64/24 66/3 68/2 75/7 78/11
86/18 89/18 127/9
they [43] 12/5 14/2 19/21 19/22 19/23
37/18 37/20 37/21 37/22 42/23 45/17
48/6 49/23 52/25 54/13 54/13 58/2
58/3 58/19 58/20 61/6 65/6 69/22
89/13 92/18 93/9 97/17 106/9 114/9
116/17 116/21 116/24 117/1 117/4
117/5 117/10 117/18 117/20 117/22
117/23 118/3 118/4 118/25
they're [10] 26/18 77/16 79/1 93/20
117/2 117/9 117/17 117/22 118/3
124/23
Thibault [9] 112/11 113/4 114/4 114/18
130/11 130/12 131/4 133/21 133/22
Thibault's [1] 114/14
thing [1] 53/22
things [8] 13/20 16/16 16/22 17/4 52/17
89/22 127/9 130/6
think [43] 9/19 10/2 11/4 13/24 16/4
16/10 17/3 18/4 18/25 27/10 32/4
34/20 37/11 41/12 43/13 43/16 44/3
44/6 50/5 51/16 52/21 54/24 56/9 58/8
58/11 58/13 63/12 63/19 65/15 65/15
65/17 71/3 71/18 72/13 82/1 82/2
99/17 101/8 112/8 115/4 120/3 133/11
133/12
third [6] 56/14 67/8 67/10 67/16 88/25
103/8
this [187]
Thomas [7] 26/14 40/12 40/18 40/20
40/22 40/23 62/16

thorough [1] 32/2
those [18] 12/13 33/18 38/8 45/19
50/11 57/11 58/16 58/24 58/25 59/2
61/14 67/9 95/10 98/7 105/15 106/21
129/1 129/5
though [9] 6/14 11/2 17/15 34/22 48/1
50/14 64/9 103/25 126/4
thought [1] 88/11
thoughts [1] 59/11
threat [1] 129/24
threatened [5] 92/18 109/23 110/4
111/16 111/19
threatening [4] 49/21 49/25 50/13
50/16
three [5] 57/3 58/7 67/5 68/7 72/14
three-page [2] 67/5 68/7
through [26] 7/14 9/4 10/11 12/10
12/12 15/15 17/3 19/16 21/12 26/3
28/2 28/18 30/13 36/14 36/16 51/17
64/6 67/21 71/12 73/17 78/4 104/3
113/3 116/12 123/1 133/22
time [49] 16/24 17/1 17/11 17/14 19/1
20/15 20/16 23/22 26/13 26/16 27/25
28/13 28/14 33/5 36/18 39/3 40/13
47/17 51/6 51/23 52/1 52/17 62/17
62/19 62/21 62/25 63/4 64/9 65/3
65/25 66/9 67/13 72/5 75/24 93/23
94/15 97/2 98/23 101/5 105/14 106/6
112/4 117/17 118/1 118/2 127/3
130/13 131/5 131/22
timed [1] 102/3
times [18] 20/22 26/1 26/7 34/15 54/11
71/6 71/7 98/17 102/15 105/10 109/22
110/3 110/7 110/8 111/20 117/14
117/20 119/8
title [2] 25/1 41/1
to the [2] 136/4 137/9
today [9] 6/17 7/3 7/6 7/10 43/12 67/11
67/24 68/9 80/1
today's [1] 72/25
together [1] 95/4
told [35] 44/25 45/8 45/16 46/11 92/25
94/10 95/20 95/25 96/3 98/10 99/3
100/17 104/10 106/1 108/10 108/25
109/12 109/22 110/1 110/3 110/3
110/7 111/9 111/11 112/2 118/20
119/1 119/14 119/21 120/16 120/19
120/20 120/22 130/9 133/5
tone [1] 111/17
too [4] 17/1 19/10 45/6 54/1
took [9] 30/25 50/5 53/9 64/5 116/7
116/9 119/24 120/22 121/4
top [6] 28/23 49/16 66/16 80/8 81/8
81/17
tops [1] 72/14
Town [1] 51/24
track [1] 13/20
trailing [1] 3/6
train [1] 107/18
trained [7] 87/18 87/18 98/1 98/9
115/14 115/17 116/12
training [11] 52/9 101/19 101/21 115/10
115/13 116/13 121/22 121/22 127/14
127/21 128/10
trains [1] 87/17
transcribed [1] 135/8
transcript [6] 3/2 5/17 9/16 10/3 135/5
137/13
transitioned [1] 65/5
tricky [1] 39/21

tried [2] 94/6 101/15
Trooper [1] 127/19
true [9] 54/22 54/23 62/9 106/23 117/5
117/6 135/6 136/3 137/13
truth [3] 136/21 137/10 137/10
trying [3] 16/9 46/2 53/11
turn [2] 97/20 110/11
turned [1] 129/6
TV [7] 12/14 13/15 13/18 13/22 14/25
15/3 15/5
twice [2] 62/17 65/16
two [16] 14/2 19/5 21/13 30/16 37/13
40/25 51/18 59/15 72/13 72/13 78/11
89/7 98/7 115/16 120/25 128/14
type [10] 20/1 29/22 33/20 41/3 41/4
119/13 122/4 125/1 126/1 127/2
types [1] 42/21
typically [8] 39/4 63/2 81/10 89/3 89/16
91/10 110/21 128/25
Tyszka [6] 1/17 1/22 135/23 136/25
137/4 137/23

U
ultimately [4] 97/25 98/8 100/23 100/24
unbecoming [3] 49/20 57/5 124/25
uncovered [3] 51/25 52/3 52/4
under [32] 6/5 15/1 19/25 20/1 25/12
27/20 29/17 30/13 32/15 35/3 38/18
41/23 42/1 49/7 53/14 56/5 56/15 57/1
61/12 89/17 97/23 97/23 101/24
106/14 108/1 108/15 111/13 115/16
116/22 117/3 118/5 137/12
under oath [1] 117/3
understand [10] 8/9 19/14 23/24 31/9
65/23 69/5 95/3 103/17 107/22 111/23
understanding [10] 56/19 87/3 105/9
109/7 109/11 113/3 128/4 128/6
129/16 132/18
understood [2] 8/12 104/12
Underwood [2] 16/9 17/16
unfounded [1] 58/9
union [1] 69/23
UNITED [1] 1/2
units [2] 40/16 60/24
unknown [11] 27/23 27/24 28/1 28/13
40/15 56/17 60/11 60/22 60/23 62/8
62/15
Unless [1] 91/14
unpleasant [1] 111/21
unrepresented [1] 9/15
until [9] 10/22 12/5 13/7 20/16 53/4
54/3 66/1 111/12 112/3
up [41] 8/8 13/16 22/5 22/11 22/20
22/21 24/23 24/24 27/17 29/10 29/13
30/23 43/18 44/2 50/11 50/12 60/22
65/1 74/2 77/16 77/18 78/6 90/18
93/15 94/22 98/21 98/24 99/9 100/8
103/3 111/12 112/3 118/24 126/10
128/14 130/24 132/9 132/12 132/15
132/18 132/22
updated [1] 28/8
uploaded [1] 101/6
upon [5] 86/10 86/19 117/6 124/20
137/11
upper [1] 21/17
upset [6] 92/16 99/4 111/11 111/14
114/25 132/8
urgently [2] 112/19 113/10
Ursula [1] 71/12
us [18] 14/13 16/10 17/13 17/22 18/23

U
us... [13] 18/24 19/23 19/24 41/7 41/7
58/12 64/24 66/3 87/17 87/19 88/11
91/15 130/11
use [6] 11/1 21/22 25/13 88/6 101/22
101/24
used [9] 11/19 16/25 17/1 24/17 24/17
50/1 54/18 101/22 118/6
using [1] 127/10

V
vague [3] 85/10 85/16 92/23
various [3] 42/21 51/19 107/13
verbal [1] 110/17
version [1] 59/10
versions [1] 78/23
very [15] 12/15 52/18 53/24 83/5 89/8
99/4 111/10 111/10 111/14 111/14
113/12 119/12 125/21 126/22 131/13
via [1] 71/5
victim [1] 54/5
video [92] 7/22 8/3 39/15 40/9 44/21
44/23 45/5 45/11 45/11 45/14 45/19
46/5 46/7 46/9 46/25 47/2 47/5 47/9
47/12 47/14 47/15 48/4 48/9 55/11
63/8 63/17 69/10 72/2 72/16 74/12
79/6 79/11 79/18 79/19 79/21 79/22
80/2 80/4 80/5 80/13 81/20 81/24
82/13 82/15 82/23 82/23 82/24 83/17
83/22 84/3 84/8 84/12 84/18 85/9 85/9
85/18 85/25 86/1 92/2 93/3 93/6 93/16
93/16 94/13 94/17 94/19 94/23 94/24
94/25 95/3 95/7 95/11 95/17 96/5
96/16 96/20 96/23 96/24 99/15 99/18
99/21 101/6 105/16 106/16 107/13
119/18 121/9 121/23 121/24 128/20
128/23 128/25
video/audio [1] 7/22
videographers [1] 121/23
videos [3] 80/6 80/10 96/14
VIDEOTAPE [1] 1/14
videotaped [1] 133/23
viewed [1] 99/21
viewing [5] 82/20 83/21 84/2 84/7 85/8
violated [4] 44/5 95/19 126/24 127/8
violating [2] 124/21 124/24
violation [8] 44/3 49/22 57/8 58/4 92/4
105/3 105/4 106/18

W
wait [4] 13/7 115/22 115/25 132/9
waitressed [1] 52/13
waitressing [1] 52/16
waived [1] 5/15
waiving [1] 10/6
want [12] 8/8 9/6 19/11 36/12 45/17
48/2 48/6 88/15 90/22 100/4 120/5
127/17
wanted [4] 41/6 44/9 52/9 77/10
was [287]
wasn't [6] 41/5 55/6 62/10 63/15 70/16
111/25
watch [1] 133/18
watched [8] 46/5 93/17 94/23 94/24
95/8 96/14 96/17 132/16
water [1] 8/15
way [13] 13/8 18/13 24/2 26/19 57/23
71/21 77/16 91/20 98/3 100/15 100/20
101/1 106/6
ways [1] 116/14

we [104] 6/13 6/18 7/20 8/8 8/15 8/15
8/18 8/20 11/14 15/22 16/25 17/1
17/11 17/12 18/17 19/8 19/25 19/25
20/1 21/2 21/22 21/22 21/23 22/20
24/12 24/24 24/24 26/4 26/24 27/10
29/13 34/11 34/13 41/4 41/6 41/8
41/19 42/6 42/8 50/5 50/7 50/24 56/3
56/13 56/13 57/15 57/16 57/17 57/18
57/19 57/20 57/22 57/25 57/25 58/4
58/6 61/18 62/14 63/3 63/4 64/25
64/25 69/23 72/19 72/22 72/25 73/4
73/5 74/4 77/10 78/4 86/24 86/24
86/25 87/3 87/22 88/11 91/16 93/2
93/16 94/23 94/24 95/7 96/14 100/8
100/24 101/18 117/12 117/12 117/14
117/14 118/8 118/15 119/5 119/5
119/8 122/6 123/22 124/20 124/22
124/25 126/8 133/1 133/3
we'll [4] 26/23 37/11 47/10 89/22
we're [7] 9/21 59/3 62/23 63/2 70/19
77/7 91/14
we've [6] 28/7 69/14 79/17 90/15 96/16
133/11
wearing [2] 40/9 54/6
Web [2] 16/1 16/3
Web site [1] 16/3
Wednesday [2] 1/19 13/25
welcome [1] 90/8
well [50] 10/21 12/10 14/25 16/15 17/4
19/17 20/15 21/4 23/3 25/13 28/4
31/13 32/6 34/4 34/19 36/16 39/4
41/20 42/20 46/2 48/11 49/10 53/20
56/4 62/2 67/6 69/13 70/6 71/21 78/7
79/5 94/22 104/6 105/16 106/7 111/3
111/23 114/18 114/20 116/6 117/3
118/2 119/12 120/18 121/11 123/22
126/20 128/20 133/1 133/23
went [7] 12/14 30/22 52/7 52/24 112/20
113/5 121/21
were [75] 10/19 12/5 12/9 12/9 14/3
15/15 15/19 17/11 17/12 18/13 18/14
19/11 19/15 19/25 19/25 31/3 32/5
34/16 36/7 36/24 40/14 40/15 40/17
40/24 40/24 41/8 47/13 48/15 49/22
50/7 50/22 51/25 53/4 53/8 53/18
53/19 54/17 55/9 55/11 56/3 58/1
58/20 58/24 59/16 59/17 60/7 60/25
61/6 61/12 61/16 62/3 67/16 71/8
71/22 78/4 81/23 81/24 88/2 91/7 93/3
96/5 96/15 97/2 102/12 106/9 108/8
108/18 108/23 109/5 111/8 116/12
118/15 120/4 125/2 132/25
WEST [1] 137/1
what [102] 9/13 9/19 9/25 11/12 12/10
13/15 14/16 21/20 21/20 23/4 23/8
25/19 27/5 27/17 30/13 33/3 34/3
35/13 37/12 38/24 40/2 40/18 40/23
41/1 41/9 44/19 45/3 45/4 45/13 45/23
46/6 46/22 47/11 49/22 50/24 51/2
51/2 51/22 52/6 52/11 52/22 53/18
53/19 54/1 57/13 58/22 59/19 61/19
66/15 66/23 68/20 68/22 69/21 70/8
71/16 71/25 73/16 73/16 78/7 80/2
80/5 87/12 89/5 93/8 93/13 94/11 95/9
95/10 96/16 97/1 98/16 99/2 100/21
100/22 101/9 101/19 103/17 104/10
105/25 108/12 108/21 109/7 110/1
111/2 111/23 113/14 113/17 113/18
115/13 116/17 117/1 117/8 123/23
124/18 125/11 127/12 129/16 130/8

130/9 131/19 132/14 133/18
what's [2] 9/7 43/7
whatever [8] 22/6 38/8 58/3 69/9 69/25
119/18 126/12 127/17
whatsoever [1] 58/10
when [66] 3/6 15/15 15/19 16/10 17/3
17/8 17/24 22/21 29/11 34/9 34/25
40/6 40/23 40/24 41/2 42/6 42/18
42/18 50/5 51/8 51/14 52/19 53/4
53/15 55/3 55/20 59/8 59/16 59/17
59/20 62/19 62/21 62/24 63/13 64/11
64/14 65/5 67/21 70/25 71/22 81/22
82/14 86/16 87/6 87/10 87/15 88/14
89/6 92/17 98/12 109/23 117/1 117/8
120/24 122/25 125/25 126/1 126/22
128/20 128/22 128/23 131/22 131/24
131/24 132/7 133/20
where [36] 5/7 11/10 11/17 20/23 25/9
25/14 26/7 27/23 29/16 29/22 30/16
32/13 43/14 45/14 52/25 54/12 58/14
58/19 60/15 64/20 71/8 73/24 89/8
90/23 93/17 108/14 114/10 114/18
117/21 118/4 118/19 120/25 120/25
126/15 129/9 133/4
whether [11] 21/12 29/9 44/8 46/2 46/3
46/17 65/1 97/12 97/17 127/4 132/14
which [43] 6/17 13/18 14/20 19/8 25/20
27/11 29/11 33/7 35/17 40/11 43/5
44/23 46/5 46/7 49/8 54/1 54/5 57/15
58/9 59/23 60/3 68/3 71/15 78/22 79/4
89/12 90/21 95/14 95/16 96/6 97/13
97/20 97/21 100/12 100/12 107/1
108/19 113/11 121/10 124/20 124/23
125/7 137/17
while [8] 6/13 47/8 49/5 53/9 58/20
99/24 117/2 117/22
white [10] 39/15 40/10 95/18 96/1 96/2
96/12 102/13 104/14 105/4 108/20
who [51] 14/11 15/9 15/20 16/8 16/10
16/11 16/14 18/24 19/22 22/17 26/9
28/17 29/4 30/12 32/16 34/7 40/9
41/23 42/1 47/14 47/16 48/5 48/15
48/16 55/10 56/23 56/25 57/2 60/7
60/25 62/3 63/8 63/13 64/1 65/9 68/11
68/11 68/14 71/14 86/22 87/17 87/17
93/21 95/19 95/20 95/25 102/8 111/9
126/18 127/18 137/9
whoever [2] 26/10 91/14
whole [2] 51/25 62/17
whom [1] 5/14
why [10] 42/4 42/10 63/11 84/24 87/22
87/24 87/25 96/23 119/1 129/20
Wiebusch [1] 71/13
wilfully [1] 110/13
will [17] 5/17 7/21 8/16 9/2 9/3 9/12
9/19 10/10 33/20 39/5 59/11 61/19
69/12 89/25 119/8 126/10 133/3
wit [1] 137/8
withdrawn [1] 58/22
withdraws [1] 58/23
within [6] 21/24 97/21 103/12 104/3
130/13 133/16
without [2] 36/14 99/20
witness [5] 5/7 63/1 115/17 117/17
137/14
witnesses [6] 38/22 38/24 39/5 39/9
115/11 118/9
woman [1] 87/17
won't [1] 8/18
word [2] 3/6 39/21

W

words [8] 44/24 45/19 105/15 111/8
 112/25 117/19 120/4 129/4
 work [22] 14/13 17/12 19/16 19/23 20/2
 20/5 20/7 22/3 22/9 23/1 51/8 51/14
 52/24 54/24 64/6 64/11 67/15 67/17
 126/5 128/10 132/2 132/21
 worked [11] 12/20 18/18 19/4 19/4 51/4
 51/6 51/16 55/3 64/12 115/15 115/16
 working [8] 14/18 14/19 15/5 15/8
 17/13 18/18 34/7 91/14
 works [4] 64/1 79/14 100/23 130/11
 would [59] 9/16 10/24 15/1 15/23 15/24
 16/9 18/7 19/23 19/24 20/1 20/19
 21/25 22/2 22/18 25/4 25/6 25/9 25/14
 25/23 26/9 26/15 28/19 28/20 29/18
 30/9 30/14 30/15 31/13 31/13 31/14
 31/15 31/25 33/6 33/10 36/22 41/6
 42/10 67/25 70/8 70/12 70/16 71/9
 71/18 72/8 79/3 79/4 87/12 89/17 91/1
 91/17 94/11 97/6 110/21 125/4 126/13
 126/14 129/5 129/5 132/9
 wouldn't [4] 19/17 70/10 97/5 123/11
 write [7] 109/21 116/14 116/17 116/23
 117/20 117/21 118/1
 writer [3] 51/4 51/19 53/11
 writes [2] 113/1 116/20
 writing [5] 52/14 59/16 59/20 127/15
 137/12
 writs [1] 20/4
 written [5] 77/17 78/17 91/1 117/15
 131/6
 wrong [3] 17/15 88/16 117/11
 wrote [9] 40/18 52/14 52/14 56/5 59/8
 59/21 60/1 92/15 94/11

Y

yeah [37] 8/4 12/12 14/11 16/23 25/4
 28/6 28/10 34/13 37/19 37/22 38/19
 39/25 40/7 44/6 45/23 47/7 47/10
 49/17 50/6 52/21 56/16 57/7 58/8
 59/10 60/12 60/17 63/25 66/11 77/3
 77/12 82/16 82/25 85/25 99/7 107/9
 123/3 127/25
 years [12] 10/22 12/2 12/4 12/10 13/5
 19/5 51/5 51/18 52/13 64/16 115/16
 125/7
 yes [161]
 yesterday [3] 72/9 72/18 73/7
 yet [3] 15/7 94/17 125/6
 you [570]
 you'll [3] 9/3 9/8 115/19
 you're [33] 8/5 16/19 17/3 23/12 23/18
 25/17 25/19 27/19 31/10 31/19 44/22
 45/9 46/3 46/13 47/7 49/5 65/25 73/11
 90/8 93/9 93/24 101/9 105/17 105/19
 108/21 110/8 110/9 110/10 119/25
 121/1 121/5 125/19 133/12
 you've [19] 7/12 13/15 17/6 35/24
 42/19 58/7 58/16 63/22 67/21 68/5
 68/8 78/9 80/11 80/11 108/1 112/4
 113/18 132/7 133/4
 your [96] 9/25 10/7 10/16 11/17 12/3
 13/2 15/20 16/1 26/15 27/4 27/9 30/3
 32/22 35/4 36/7 36/18 39/24 42/16
 44/7 44/19 45/3 45/4 46/3 50/19 51/23
 52/11 52/11 54/21 54/24 54/24 54/25
 56/19 58/14 59/4 60/5 61/7 64/6 64/17
 65/18 65/20 67/11 70/21 75/16 77/5
 80/1 81/1 86/11 90/16 90/16 91/10

92/21 97/20 98/18 99/6 99/22 100/5
 100/7 101/14 101/17 103/23 105/2
 105/2 105/8 106/4 106/7 106/19
 107/10 107/15 109/7 110/16 110/24
 111/14 113/3 114/25 118/23 120/15
 120/24 121/17 122/18 123/2 123/15
 124/9 126/5 128/10 128/23 129/5
 129/9 129/13 129/21 129/25 130/1
 130/15 131/18 131/22 132/8 132/21
 yours [1] 130/13
 yourself [1] 104/4
 YouTube [6] 44/21 44/23 45/5 45/19
 54/9 101/6

Z

Zoning [1] 51/20