

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

AMERICAN NEWS & INFORMATION SVCS. INC. and EDWARD PERUTA Plaintiff	*	CIVIL ACTION NO. 3:15-CV-01209-RNC
	*	
vs.	*	
	*	
JAMES C. ROVELLA, MICHAEL COATES, BRANDON J. O'BRIEN, SEAN SPELL, BRIAN FOLEY, ET AL. Defendants	*	MARCH 24, 2017
	*	
	*	

VIDEOTAPE DEPOSITION
OF
OFFICER MICHAEL COATES

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 Friday, March 24, 2017, commencing at 10:05 a.m.

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A P P E A R A N C E S

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ALSO IN ATTENDANCE:

Edward Peruta

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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
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LIST OF EXHIBITS
[Marked for Identification]

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MICHAEL COATES

PLAINTIFF

<u>EXHIBIT NO.</u>	<u>DESCRIPTION</u>	<u>PAGE</u>
67	General Order 3-2b (pgs)	11
68	(Copy of Exhibit 4) Hartbeat Dispatch Summary Record 9/12/14 (14 pgs)	13
69	(Copy of Exhibit 7) Crime Scene Entry Log 9/12/14 (2 pgs)	14
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**REPORTER'S NOTE: All exhibits retained
by Court Reporter and
returned to Attorney Baird.

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

1
2
3 It is stipulated by the Attorneys for the Plaintiff
4 and the Defendant that each party reserves the right to
5 make specific objections in open court to each and every
6 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 the
11 notice.

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

15 It is further stipulated and agreed that the Deponent
16 will read and sign the deposition transcript.

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1 OFFICER MICHAEL COATES,
2 Deponent, of Hartford Police Department, 253 High
3 Street, Hartford, Connecticut 06103, after first
4 having been duly sworn by the Court Reporter,
5 testified under oath as follows:

6
7 [Mr. Peruta not present.]

8
9 [Plaintiff Exhibit 67-76: Marked for ID.]

10
11 DIRECT EXAMINATION

12
13 BY MS. BAIRD:

14 Q Good Morning, Lieutenant. How are you today?

15 A Good morning. Fine. Thank you.

16 Q We were introduced prior to going on the record,
17 but I'll do so again. My name is Attorney Rachel Baird.
18 This is my office, and I represent American News &
19 Information Services and Edward Peruta in a federal
20 lawsuit brought against you as an individual, and some
21 other individuals, and Chief Rovella in the matter of
22 *Peruta versus Rovella*. And thank you for joining me today
23 in this deposition.

24 A You're welcome.

25 Q Have you been through this process of a

1 deposition previously?

2 A I have.

3 Q On approximately how many occasions?

4 A A couple of times maybe?

5 Q When was the last time?

6 A Ten years ago?

7 Q Okay. So even though you probably recall some
8 of the process or procedures related to a deposition, I'll
9 go over it again.

10 If you answer a question, make sure it's verbal,
11 not a nod of the head because we do have a court reporter
12 taking down what you say. We also have a video camera
13 taking down your image and what you say as well. Okay?

14 A Okay.

15 Q If you need a break, let me know, we will take a
16 break. If you don't understand a question that I ask,
17 again let me know that you don't understand the question.
18 Don't try to answer a question if you don't understand it.

19 A Okay.

20 Q Agreed? And let me see, what else? If there's
21 anything affecting your ability to focus on what I'm
22 saying or to comfortably answer, whether it be physical,
23 mental whatever else, bring that to our attention because
24 the goal here is to ask clear questions and get accurate
25 answers.

1 A I will.

2 Q So I will begin. What is your current position
3 with the Hartford Police Department?

4 A I am a police lieutenant, and my current
5 assignment is the commander of Internal Affairs.

6 Q How long have you been the commander of Internal
7 Affairs?

8 A Since October of 2014.

9 Q When you became the commander of Internal
10 Affairs in October of 2014, who did you directly report
11 to?

12 A Directly report? To Deputy Chief Dustin Rendock
13 and the chief of police.

14 Q Have the individuals that you directly report to
15 changed since October of 2014 in your current assignment?

16 A They have not.

17 Q And do you directly report to -- is it Deputy
18 Chief Rendock?

19 A Yes, ma'am.

20 Q Do you directly report to Deputy Chief Rendock
21 and Chief Rovella equally or is there a chain of command?

22 A There is a chain of command. It goes Deputy
23 Chief Rendock to Chief Rovella.

24 Q What is Deputy Chief Rendock's position
25 currently?

1 A He is the deputy chief in charge of Professional
2 Standards Bureau.

3 Q Was his position the same in October 2014 as the
4 deputy chief of the Professional Standards Bureau?

5 A Yes, ma'am.

6 Q What did you do prior to your assignment as
7 commander in October 2014 of the -- is it the I.A.U.?

8 A I.A.D. Internal Affairs Division.

9 Q Okay. What was your immediate position prior to
10 becoming commander of the I.A.D.?

11 A I was a sergeant assigned to the Vice &
12 Narcotics Division.

13 Q And how long did you serve as sergeant assigned
14 to the Vice & Narcotics Division?

15 A Approximately six years?

16 Q And just prior to that assignment as sergeant of
17 the Vice & Narcotics Division, what was your assignment?

18 A I was a sergeant assigned to a Street Crimes
19 Unit.

20 Q To what street crimes?

21 A Street Crimes Unit.

22 Q Okay. Did you serve in any particular area or
23 areas --

24 A City-wide.

25 Q -- of the city? And how long were you a

1 sergeant assigned to a Street Crimes Unit?

2 A Approximately six months?

3 Q When did you become sergeant?

4 A In February of 2008, I believe.

5 Q What was your first assignment as a sergeant?

6 A Patrol.

7 Q And what was your next assignment as a sergeant?

8 A Street Crimes -- city-wide Street Crimes Unit.

9 Q When did you join the Hartford Police
10 Department?

11 A 2003.

12 Q And between 2003 and 2008, is it fair to say
13 that you were a patrol officer?

14 A No, ma'am.

15 Q What were you?

16 A For the first two years -- I believe 2003,
17 2004 -- I served in the Patrol Division. And then I was
18 assigned to the Community Response Division which later
19 became the Conditions Unit. And then in 2007 I was
20 appointed -- I guess you could say appointed to a
21 detective -- Major Crimes detective. And I was in Major
22 Crimes until I was promoted in February 2008 to the rank
23 of sergeant.

24 Q I'm going to hand you Exhibit 27 -- Exhibit 26,
25 excuse me. Directing your attention to the second page of

1 Exhibit 26 where it references, under Section 3, a General
2 Order No. 3-2b. Are you able to find that?

3 A Yes.

4 Q And are you familiar with General Order 3-2b?

5 A Yes.

6 Q Do you know if that's the General Order that's
7 currently in effect?

8 A One of them, yes.

9 Q And -- right. And do you know if that General
10 Order was in effect on September 12th of 2014?

11 A I believe so. Yes.

12 MS. BAIRD: I'd have this mark as the next
13 exhibit.

14

15 [Plaintiff Exhibit 67: Marked for ID.]

16

17 BY MS. BAIRD:

18 Q Handing you what's been marked as Exhibit 67.
19 If you want to take an opportunity just to look through it
20 and then indicate whether you recognize it.

21 A This is 3-2b, yes.

22 Q Was Exhibit 67 in effect when you became
23 commander of the I.A.D. in October 2014?

24 A Yes.

25 Q Looking at Exhibit 27 again and directing your

1 attention to -- excuse me, 26. Looking to Exhibit 26
2 again and directing your attention to page two. Under
3 Section 3 of the General Orders, there is a General Order
4 3-02 entitled "Citizen Complaint Procedure" listed. Do
5 you see that?

6 A Yes.

7 Q Did Exhibit 67 rescind General Order No. 3-02?

8 A Not to my knowledge, no. It amended it.

9 Q Okay. And again directing your attention to
10 General Order 3-2a listed on Exhibit 26 on the second page
11 entitled "Citizen Complaint Procedure - Amendment to Order
12 3-2," again, did Exhibit 67 rescind General Order
13 No. 3-2a?

14 A No.

15 Q Okay. Do you know if General Orders No. 3-02 --
16 I'll start with that one -- is still in effect?

17 A Yes.

18 Q And with regard to General Order 3-2a, is that
19 still in effect?

20 A Yes.

21 Q And then if I could direct your attention to the
22 last page of Exhibit 26, which is page 10.

23 MS. HARRIS: Exhibit?

24 MS. BAIRD: Twenty-six.

25

1 BY MS. BAIRD:

2 Q Under the Standard Operating Procedures there's
3 a listing for IAD 13-001. Do you see that?

4 A I do.

5 Q And it references -- or has next to it "Citizen
6 Complaints Conducting Internal Investigations." Do you
7 see that?

8 A Yes.

9 MS. BAIRD: And I will have this marked as
10 the next exhibit.

11

12 [Plaintiff Exhibit 68: Marked for ID.]

13

14 BY MS. BAIRD:

15 Q Give you a moment to look at the pages contained
16 in Exhibit 68. Do you recognize Exhibit 68?

17 A I do.

18 Q And is that the document referenced in
19 Exhibit 26 on page 10 under Standard Operating Procedures?

20 A Yes.

21 Q On Exhibit 68 on page one, in the box at the top
22 there is a "Reference GO 3-2b" language. Do you see that?

23 A Yes.

24 Q Does that reference Exhibit 67?

25 A Yes.

1 Q Okay.

2 MS. BAIRD: This could be marked as the
3 next exhibit.

4

5 [Plaintiff Exhibit 69: Marked for ID.]

6

7 BY MS. BAIRD:

8 Q Handing you Exhibit 69. Have you seen
9 Exhibit 69 previously?

10 A Yes.

11 Q Directing your attention to the second page of
12 Exhibit 69 at the top, under "Purpose of This Report," it
13 references that this is the fifth annual report of the
14 Hartford Police Department I.A.D. Do you see that
15 language?

16 A I do.

17 Q And do you know if there were four previous
18 reports to Exhibit 69?

19 A I'm just trying to think. I know I produced two
20 or three of them, so I'm going to say yes.

21 Q And do you know if there was a report produced
22 prior to September 12th of 2014?

23 A Yes.

24 Q Okay. When was -- what was the time frame when
25 you produced your reports?

1 A Generally in the first quarter of each new year
2 for the previous year.

3 Q Okay. So looking at Exhibit 69, going by the
4 general rule that -- or the generality that you just
5 testified about, Exhibit 69 has the date of 2016 on the
6 front; correct?

7 A Correct.

8 Q So going again by generality, is it fair to say
9 that this report would have been produced in January
10 through -- first quarter, that's January through March of
11 2017?

12 A No.

13 Q When would it have been -- when was it produced?

14 A January -- probably the first quarter of 2016 it
15 would be.

16 Q Okay. Now, prior to becoming commander of the
17 Internal Affairs department, did you have any involvement
18 in producing a report similar to Exhibit 69?

19 A No, ma'am.

20 Q You would have done that after you became the
21 commander; right?

22 A Correct.

23 Q And so do you know if the first report that you
24 were involved in producing was produced in January through
25 March of 2015?

1 A Yes. That sounds right, yes.

2 Q And then Exhibit 69, you've already said that it
3 would have been produced in January through March of 2016;
4 correct?

5 A Correct.

6 Q And are you in -- do you know if the I.A.D. or
7 the HPD's in the process of producing a report that will
8 have "2017" on the cover?

9 A Yes, ma'am.

10 Q And how far along is the HPD --

11 MS. HARRIS: I'm going to object. This
12 is --

13 MS. FEOLA-GUERRIERI: I object.

14 MS. HARRIS: -- not in any way related to
15 the allegations in this complaint.

16 MS. FEOLA-GUERRIERI: I'm going to join in
17 that. I think this line of questioning is going
18 far afield of the allegations --

19 MS. BAIRD: Are you telling him not to
20 answer?

21 MS. HARRIS: You can answer -- what, the
22 question is whether or not they're in the
23 process?

24 MS. BAIRD: In the process and how far
25 along.

1 MS. HARRIS: He answered that they were in
2 the process; right?

3 THE WITNESS: Yes.

4 MS. HARRIS: That's his --

5 MS. BAIRD: Are you telling him not to
6 answer how far along?

7 MS. HARRIS: I am going to claim it,
8 because I don't think it's at all relevant.

9 BY MS. BAIRD:

10 Q Has it been completed?

11 A No.

12 Q When you joined the I.A.D. -- or when you became
13 commander of the I.A.D. in October of 2014, was Chief
14 Rovella the chief of the Hartford Police Department?

15 A Yes, ma'am.

16 Q Was there an assistant chief of the Hartford
17 Police Department at that time?

18 A I believe -- I believe so, yes.

19 Q And who was that?

20 A Chief Heavren -- Assistant Chief Heavren.

21 Q Who did you supervise in the I.A.D. when you
22 became the commander in October 2014? If anyone.

23 A I supervised my Internal Affairs sergeants. I
24 also supervised the Backgrounds Division and Civil
25 Litigation.

1 Q In October 2014, how many I.A.D. sergeants were
2 there?

3 A Eight?

4 Q And did that remain consistent through 2015?

5 A We might have lost one or two. I'm not sure.

6 Q Did the sergeants supervise anybody in the
7 I.A.D.?

8 A In Internal Affairs, no. They all reported to
9 me. They did not have any subordinates.

10 Q And in Civil Litigation, how many people did you
11 supervise in Civil Litigation in 2014?

12 A One.

13 Q And who was that? In 2014 when you joined.

14 A I have to remember her name.

15 Q When you say "her," was she a civilian?

16 A It was Detective Ursula Wiebusch. Sorry.

17 MS. FEOLA-GUERRIERI: How could you forget
18 her?

19 THE WITNESS: I know.

20 BY MS. BAIRD:

21 Q And was Detective Wiebusch there throughout
22 2015?

23 A I believe so.

24 Q Did she leave at any point?

25 A Yes.

1 Q And was she replaced by anybody?

2 A Yes.

3 Q And who was she replaced by?

4 A Detective Omayra Martinez-Baidy.

5 Q And do you know when that -- do you know when
6 Detective Martinez-Baidy replaced Detective Wiebusch?

7 A It's probably a year-and-a-half ago now. About
8 a year-and-a-half.

9 Q And is Detective Martinez-Baidy still -- does
10 she still report to you as a member of the Civil
11 Litigation?

12 A Yes.

13 Q And Background, what role does this unit or
14 division called "Background" play?

15 A Backgrounds Unit conducts all background
16 investigations for potential police candidates --

17 Q Okay.

18 A -- civilians, citizen ride-alongs, pistol
19 permits.

20 Q I'm going to Exhibit 45. There you go. Have
21 you seen Exhibit 45 previously?

22 A Yes.

23 MS. HARRIS: I don't think she meant to
24 hand you -- maybe she did -- 46, but right now
25 she's asking 45.

1 BY MS. BAIRD:

2 Q Oh, okay. 45. Did I hand you that? Yeah,
3 okay.

4 Who is Lieutenant Brandon O'Brien, whose name
5 appears on the first page of Exhibit 45?

6 A He is a lieutenant. He's the commander of the
7 Vice, Intelligence & -- or -- Narcotics Division, yeah.

8 Q What role, if any, did you have in the
9 investigation of I.A.D. Case No. 14-100?

10 A In terms of investigating? I had none.

11 Q In terms of intake of the complaint did you have
12 any role?

13 A I did not.

14 Q Is it fair to say that when I.A.D. Case
15 No. 14-100 was filed, you were not in the Internal Affairs
16 unit yet or Internal Affairs department yet?

17 A That's correct.

18 Q When you became commander in October of 2014,
19 did you review the pending Internal Affairs complaints and
20 investigations?

21 MS. FEOLA-GUERRIERI: Objection to form.

22 MS. HARRIS: Yeah, I join the objection,
23 but you can answer if you understand it.

24 A I would have -- yes. I would have reviewed the
25 open cases, yes.

1 BY MS. BAIRD:

2 Q And how is an open case defined in the I.A.D.?

3 A One that's still active that hasn't been closed
4 by the chief of police.

5 Q At some point did you become familiar with
6 I.A.D. Case No. 14-100 after becoming commander?

7 A I was aware of it, yes.

8 Q Were you aware of I.A.D. Case No. 14-100 prior
9 to becoming commander of the department?

10 A No.

11 Q And do you know when you became aware of I.A.D.
12 Case No. 14-100?

13 A I believe it was in my first few weeks of
14 assuming command of the division.

15 Q And what brought Case No. 14-100 to your
16 attention?

17 A From what I remember there was no -- we didn't
18 have any video associated with the complaint.

19 Q Was Lieutenant Brandon -- strike that.

20 What was, if you know, Lieutenant Brandon
21 O'Brien's role in Case No. 14-100?

22 A What was his -- he was the investigator assigned
23 to the complaint.

24 Q And do you know who assigned Lieutenant O'Brien
25 to investigate the complaint?

1 A I did.

2 Q Did you assign Lieutenant O'Brien to investigate
3 the complaint after you became commander of the I.A.D.?

4 A Correct.

5 Q Was anybody assigned to investigate 14-100 prior
6 to Lieutenant O'Brien?

7 A Yes.

8 Q And who was that?

9 A Lieutenant Gerardo Pleasant.

10 Q What was the reason, if you know, for the change
11 from the investigator being Lieutenant Pleasant to
12 Lieutenant O'Brien?

13 A When I did actually get to review the video --
14 and I can't remember where; if it was sent to me or on
15 YouTube -- I observed that it was actually Sergeant Spell
16 who was the target officer in the complaint. And then I
17 realized Brandon O'Brien was his commander, so I
18 reassigned it to Brandon O'Brien to investigate.

19 Q And what reason did you have for assigning
20 Sergeant Spell's commander to investigate the complaint
21 instead of Lieutenant Pleasant?

22 A Because for field complaints they would go to
23 the target officer's commander.

24 Q Okay. Do you know if -- upon the assignment of
25 Lieutenant Pleasant to 14-100, if any interviews had been

1 conducted by Lieutenant Pleasant?

2 A No.

3 Q What work in the investigation related to 14-100
4 had Lieutenant Pleasant performed, if any?

5 A I don't think he did anything.

6 Q Was Lieutenant Pleasant assigned to the I.A.D.
7 when you became commander in October 2014?

8 A No, ma'am.

9 Q Did you supervise Lieutenant O'Brien in his
10 investigation of 14-100?

11 A No, ma'am.

12 Q Did you review Lieutenant O'Brien's
13 investigation in Case No. 14-100?

14 A At some point I did.

15 Q And what point would that have been?

16 A That would have been probably when I found out
17 about the lawsuit.

18 Q And what lawsuit are you referring to? The one
19 we're here for today?

20 A Yes, ma'am.

21 Q And what reason would you have reviewed his work
22 when you found out about the lawsuit?

23 A Because I knew the lawsuit was centered on -- or
24 in part on that complaint.

25 Q And in terms of reviewing 14-100 when you found

1 out about the lawsuit, what did that review consist of?

2 A I'm sure I just read the file -- the report.

3 Q Okay. And the report -- the report you're
4 referring to, does that include Exhibit 45?

5 A Yes, ma'am.

6 Q Does Case No. 14-100 include any video footage?

7 A Yes.

8 Q Okay. And does I.A.D. Case No. 14-100 have a
9 folder -- a physical folder at the HPD?

10 A Yes.

11 Q And does that folder contain any disk or drive
12 or thumb drive or anything containing video footage
13 related to 14-100?

14 A Yes.

15 Q Did you observe the video footage that's on the
16 drive or whatever media contains the video footage in the
17 file for Case No. 14-100?

18 MS. HARRIS: I'm just going to object and
19 instruct you that she's not permitted to know
20 anything we've discussed. So outside of any
21 discussions you and I have had you may answer.

22 MS. FEOLA-GUERRIERI: Yes. Objection. Are
23 you asking at the time that he reviewed it?

24 MS. BAIRD: Yes.

25 MS. FEOLA-GUERRIERI: The first time he's

1 reviewed it?

2 MS. BAIRD: Yes.

3 BY MS. BAIRD:

4 Q The footage that's in his file -- not yours, but
5 in his file at the HPD.

6 A No, ma'am.

7 Q Okay. Now, you did view, I believe was your
8 testimony, some video related to 14-100 on YouTube or some
9 other Internet --

10 A Yes.

11 Q -- access.

12 A I believe so, yes.

13 Q And when you viewed that video on the Internet,
14 did you identify Sergeant Spell as the individual
15 complained about in 14-100?

16 A Yes.

17 Q Did you review Plaintiff's Exhibit 45 at or near
18 the date after which it was completed?

19 A I would have had to, yes.

20 Q And why would you have had to?

21 A It would have come back to me closed from the
22 chief of police, and I would have had to send out a
23 disposition notice to the involved officers as well as
24 have the disposition letter sent to the complainant.

25 Q In Exhibit 45 on the first page, it lists the

1 person to whom the memorandum is addressed as Deputy Chief
2 Brian J. Foley. Do you see that?

3 A I do.

4 Q Did you at that time, in March of 2015, report
5 to Deputy Chief Foley?

6 A No.

7 Q Did at that time, in March of 2015, memorandums
8 of I.A.D. investigation findings go to Deputy Chief Foley?

9 A Certain investigations would have, yes.

10 Q Did certain investigation findings go to you?

11 A Yes.

12 Q Let me just direct your attention to the last
13 page of Exhibit 45 where it says "exonerated."

14 A Yes.

15 Q Is this memorandum that's been marked as
16 Exhibit 45 characterized as some kind of finding of the
17 I.A.D.?

18 A Yes, ma'am.

19 Q Okay. And after a finding has been made -- or
20 after the finding was made in Exhibit 45 of exoneration,
21 was the next step that the finding be conveyed to Deputy
22 Chief Foley?

23 A Yes.

24 Q Okay. And do you know why in the case of 14-100
25 the finding was communicated to Deputy Chief Foley?

1 A Yes.

2 Q Why?

3 A He follows -- or Lieutenant O'Brien falls under
4 Deputy Chief Foley in the chain of command.

5 Q Did you review 14-100's finding in Exhibit 45
6 for any reason?

7 MS. HARRIS: Objection to the form.

8 MS. FEOLA-GUERRIERI: Objection.

9 BY MS. BAIRD:

10 Q At or around the time of March 26th, 2015.

11 A I'm not sure if it was at that time, but like I
12 said previously, I would have had to in order to send out
13 the disposition notice and the complainant letter.

14 Q Did you have any input into the manner of
15 investigating Case No. 14-100?

16 A No.

17 Q Did you have any authority to supervise
18 Lieutenant O'Brien in the manner in which he investigated
19 Case No. 14-100?

20 A No.

21 Q Okay. This is Exhibit 21, and also 23 and 24,
22 which are one-page letters as well. Just hand them all at
23 the same time.

24

25 MS. HARRIS: Did you give 21 through 28?

1 MS. BAIRD: Yes.

2 MS. HARRIS: All right. Got it.

3 BY MS. BAIRD:

4 Q Directing your attention to Exhibit No. 21, have
5 you seen this letter before?

6 A Yes, I believe so.

7 Q And did you see Exhibit 21 after you became
8 commander of the I.A.D.?

9 A Yes.

10 Q Who preceded you as the commander of I.A.D.?

11 A Now Lieutenant Martin Cunningham was the acting
12 commander prior to my arrival.

13 Q Is now Lieutenant Cunningham still in the
14 I.A.D.?

15 A No, ma'am.

16 Q When did Lieutenant Cunningham leave the I.A.D.?

17 A October of 2014 when I took over.

18 Q Who was in charge of the I.A.D. prior to
19 Sergeant Cunningham becoming the acting commander?

20 A It was Lieutenant Rob Davis.

21 Q And do you know why Chief Heavren would have
22 been the person assigning an investigation for
23 Mr. Peruta's complaint as reflected in Exhibit 21?

24 MS. FEOLA-GUERRIERI: Objection to the
25 form.

1 MS. HARRIS: You can answer if you
2 understand the question.

3 MS. FEOLA-GUERRIERI: Are you asking him to
4 speculate as to -- or are you asking him about
5 procedure?

6 MS. BAIRD: Well, I -- okay.

7 BY MS. BAIRD:

8 Q Do you see Exhibit 21?

9 A Yes, ma'am.

10 Q Okay. And in the second line it says Chief
11 Heavren will be assigning an investigator for your
12 complaint?

13 A Yes, ma'am.

14 Q Do you have any personal knowledge of Chief
15 Heavren assigning an investigator for Mr. Peruta's
16 complaint?

17 A No, ma'am.

18 Q Do you know what position Chief Heavren held on
19 September 16, 2014?

20 A Assistant chief.

21 Q And when you became commander in 2014, was Chief
22 Heavren still the assistant chief?

23 A I believe so.

24 Q And did he assign investigations after you
25 became commander in 2014?

1 A He might have.

2 Q And I was unclear. Do you still have an
3 assistant chief?

4 A No, ma'am.

5 Q Okay. Was Assistant Chief Heavren the last one,
6 that you recall?

7 A I believe so, yes.

8 Q In reviewing the file 14-100 when you became
9 commander of the I.A.D. in October 2014, did it come to
10 your attention or did you learn whether Chief Heavren had,
11 in fact, assigned an investigator for Mr. Peruta's
12 complaint?

13 A No.

14 Q Do you know who assigned Lieutenant Pleasant to
15 investigate Mr. Peruta's complaint?

16 A It would have been Chief Heavren.

17 Q And what was Lieutenant Pleasant's assignment at
18 that time, in September 2014?

19 A He was either a patrol or a headquarters
20 commander.

21 Q Directing your attention to Exhibit 23, which is
22 a one-page letter, have you seen Exhibit 23?

23 A Yes.

24 Q Did you have any involvement in drafting
25 Exhibit 23?

1 A No, ma'am.

2 Q How long is -- let me strike that.

3 Are there -- since you've been commander of the
4 I.A.D., are there parameters for the length of time that
5 I.A.D. investigations can take?

6 A Yes, ma'am.

7 Q And what are those parameters? Since
8 October 2014. And if they've changed, let me know.

9 A Okay. They are supposed to be done within 60
10 days.

11 Q And was 14-100 completed within 60 days?

12 A No.

13 Q Do you know why?

14 A No. I mean I can tell you why up front.
15 Because I had to reassign it, so he lost probably a few
16 weeks of investigation time there, but I can't tell you
17 after that, no.

18 Q And you're talking about the reassignment from
19 Lieutenant Pleasant to Lieutenant O'Brien?

20 A That's correct.

21 Q Do you know how long it was after you became
22 commander when that transfer from Lieutenant Pleasant to
23 Lieutenant O'Brien as the investigator occurred?

24 A I do not.

25 Q Just if you still have -- you do have the

1 memorandum in front of you, Exhibit 22. Just directing
2 your attention to paragraph three on the first page.

3 Oh, did I get it right?

4 MS. HARRIS: I think you had given him a
5 different copy. I think it was 45 I think was
6 the one you were --

7 BY MS. BAIRD:

8 Q Forty-five. I'm sorry.

9 A Yes, ma'am.

10 Q Okay. Paragraph three of Exhibit 45 where it
11 states, "On or about November 17th, 2014, Lieutenant
12 O'Brien spoke to Edward Peruta," is it fair to say that
13 prior to November 17th, 2014, Lieutenant O'Brien would
14 have been assigned to the investigation?

15 A Yes, ma'am.

16 Q Is there any -- is there any action taken when
17 an I.A.D. takes longer than 60 days to investigate --

18 MS. HARRIS: Objection.

19 MS. FEOLA-GUERRIERI: Objection to form.

20 BY MS. BAIRD:

21 Q -- I.A.D. complaint?

22 MS. HARRIS: Objection to the form.

23 You can answer if you understand.

24 A Yes.

25

1 BY MS. BAIRD:

2 Q And what is that?

3 A Generally, per the Order the investigator would
4 have to request a 15-day extension to the Internal
5 Affairs commander. Anything over 15 days or 75 days
6 total, the chief of police would have to give permission.

7 Q If you still have Exhibit 68 in front of you?

8 A Yes, ma'am.

9 Q And directing your attention to page 5 of 7 of
10 Exhibit 68. Does that contain provisions to follow when
11 an I.A.D. investigation takes longer than 60 days?

12 A Yes, ma'am.

13 Q And were those in effect on or after
14 September 12th, 2014?

15 A Yes, ma'am.

16 Q Do you know if that procedure was followed in
17 14-100?

18 A No.

19 Q Would there be a way to check to see if the
20 procedure was followed?

21 MS. FEOLA-GUERRIERI: Objection to form.

22 A I would have to see if -- yes, there is a way, I
23 suppose.

24 BY MS. BAIRD:

25 Q But sitting here today, you don't have knowledge

1 of whether that procedure was followed or not?

2 A I do not; correct.

3 Q In reviewing Exhibit 45, are you able to
4 determine for what charge or charges there was a finding
5 in 14-100?

6 A Yes, ma'am.

7 Q And for what charge or charges was there a
8 finding?

9 MS. HARRIS: Objection to form.

10 You can answer.

11 A Discourteous Attitude.

12 BY MS. BAIRD:

13 Q And what was the finding?

14 A Exonerated.

15 Q And in looking at Plaintiff's Exhibit 23, that
16 letter, does the letter, Exhibit 23, convey the finding in
17 Exhibit 45?

18 A Yes, ma'am.

19 Q Do you know if Mr. Peruta made an allegation of
20 Discourteous Attitude in his complaint?

21 MS. HARRIS: Object to the form.

22 You can answer.

23 A I'm sorry?

24 BY MS. BAIRD:

25 Q Do you know if Mr. Peruta made a complaint of

1 Discourteous Attitude in his complaint 14-100?

2 A Without -- no. I don't know.

3 Q Did you actually review Mr. Peruta's complaint
4 for any reason after you became commander?

5 A Yes.

6 Q And why did you review it?

7 A Probably it's when I read the report and when I
8 found out about the lawsuit. Or it could have been
9 before, I don't recall.

10 Q Okay. Exhibit 31. Do you recognize Exhibit 31?

11 A I do.

12 Q And what is it?

13 A It's Edward Peruta's citizen complaint which was
14 filed under 14-100.

15 Q And on page one of Exhibit 31 where it refers to
16 field lieutenant, do you know if that was Lieutenant
17 Pleasant?

18 A Yes.

19 Q And on Exhibit 31, on the first page in the
20 bottom left-hand corner, are you able to tell who the
21 person indicated is who accepted the complaint?

22 A Sergeant Martin Cunningham.

23 Q In reviewing the complaint, Exhibit 31, did you
24 identify what allegations Mr. Peruta had made?

25 MS. HARRIS: Objection. Again you're

1 asking when he came on?

2 MS. BAIRD: Well, he's unclear when he
3 reviewed it. So whenever he reviewed it. He
4 says he -- I believe he said he reviewed it when
5 he learned of civil litigation or litigation. I
6 don't know what that was --

7 A But it --

8 MS. HARRIS: Again --

9 BY MS. BAIRD:

10 Q How many times --

11 MS. HARRIS: Just don't answer as to
12 anything that you and I have discussed.
13 Anything prior to counsel.

14 BY MS. BAIRD:

15 Q Right. And yes, these questions are asked in
16 terms of your performance of your job as the commander of
17 I.A.D. And I'll try to say that each time just so we're
18 all on the same -- just so we all remember. So let me ask
19 it again.

20 In your performance as the commander of I.A.D.,
21 did you review Exhibit 31?

22 A Yes.

23 Q Okay. Do you recall how many times you reviewed
24 Exhibit 31?

25 A No.

1 Q When did you review Exhibit 31?

2 A Some point after October 2014.

3 Q Okay. And whenever that time frame was after
4 October 2014 when you reviewed Exhibit 31, did you
5 identify the allegations that Mr. Peruta was making
6 against the officer or officers?

7 A Yes.

8 Q And what were those?

9 A The allegations Mr. Peruta was making? I see
10 them here on top of this page: Conduct Unbecoming,
11 Harassment, Threatening Arrest of the Complainant, and
12 Civil Rights Violation.

13 Q Do you know if there was a finding by the I.A.D.
14 in Case No. 14-100 regarding Mr. Peruta's allegation in
15 Exhibit 31 of a Civil Rights Violation?

16 MS. FEOLA-GUERRIERI: Objection. Form.

17 MS. HARRIS: Join.

18 A No.

19 BY MS. BAIRD:

20 Q Was there a finding by the I.A.D. in Case
21 No. 14-100 pertaining to Mr. Peruta's allegation of a
22 Civil Rights Violation?

23 MS. FEOLA-GUERRIERI: Objection to form.

24 MS. HARRIS: Objection to form.

25 A No.

1 BY MS. BAIRD:

2 Q Do you know why not?

3 A No.

4 Q Was there a finding in I.A.D. Case 14-100
5 pertaining to Mr. Peruta's allegation of Harassment as
6 contained in Exhibit 31?

7 MS. FEOLA-GUERRIERI: Objection to form.

8 MS. HARRIS: Join.

9 A No.

10 BY MS. BAIRD:

11 Q Do you know why not?

12 A No.

13 Q Was there a finding in I.A.D. Case No. 14-100
14 pertaining to Mr. Peruta's complaint of Harassment as
15 contained in Exhibit 31?

16 MS. FEOLA-GUERRIERI: Objection.

17 MS. HARRIS: Objection.

18 You can answer.

19 A No.

20 BY MS. BAIRD:

21 Q Do you know why not?

22 A No.

23 Q Was there a finding in Case No. 14-100
24 concerning Mr. Peruta's allegation of Conduct Unbecoming
25 an Officer as contained in Exhibit 31?

1 MS. FEOLA-GUERRIERI: Objection.

2 MS. HARRIS: Join.

3 You can answer.

4 A No.

5 BY MS. BAIRD:

6 Q Do you know why not?

7 A No.

8 Q Exhibit 24 is a one-page letter, that I believe
9 you already have in front of you, dated April 23rd, 2015.

10 A Yes.

11 Q Have you seen Exhibit 24 previously?

12 A Yes.

13 Q Have you noticed -- or did you notice when you
14 saw Exhibit 23 and 24 previously that the date contained
15 in the first sentence was different?

16 A Yes.

17 Q And do you agree that the date in Exhibit 24 is
18 a correction to the date in Exhibit 23?

19 A Yes.

20 Q Did you have any input into effecting or making
21 that correction?

22 A No.

23 Q Did you notice that error in Exhibit 23?

24 A Yes.

25 Q Okay. Did you bring that to the attention of

1 Chief Rovella?

2 A No.

3 Q When did you notice the error?

4 A When I reviewed the two documents and saw the
5 corrected date on one.

6 Q Do you know if there are form letters that are
7 used to notify complainants about the findings or results
8 of their I.A.D. complaints?

9 A Yes, ma'am.

10 Q And what are the -- are there a specific number
11 of form letters?

12 A Depending on the disposition, yes. Or the
13 finding, yes.

14 Q And in looking at Exhibit 24, the third
15 sentence -- the second and third sentence, I should say --
16 third sentence in Exhibit 24, "The acts reported did occur
17 but were justified, lawful and proper," is that language
18 that is contained in one or more of the form letters that
19 go out to complainants after the I.A.D.?

20 A Yes, just one: The "Exonerated" form letter.

21 Q How many classes, if there are classes, or
22 categories, if there are categories, of I.A.D. complaints
23 are there?

24 A Two.

25 Q And what are those?

1 A Class A and Class B complaints.

2 Q What class is a Civil Rights Violation Internal
3 Affairs complaint?

4 A A.

5 Q What class is a Conduct Unbecoming an Officer
6 complaint?

7 A A.

8 Q What class is a Harassment complaint?

9 A B.

10 Q And is there a nature of complaint that is
11 Threatening Arrest?

12 A It would find its cat -- yeah, we would have a
13 category depending on the circumstances.

14 Q What class of complaint is Discourteous Conduct?

15 A B.

16 Q Why are the various complaints made to I.A.D.
17 classified or categorized as A or B?

18 MS. HARRIS: Objection.

19 You can answer.

20 MS. FEOLA-GUERRIERI: Objection.

21 A They're based on the severity of the
22 allegations. Class As are more severe.

23 BY MS. BAIRD:

24 Q Does the classification of an allegation as A or
25 B affect its investigation?

1 A I don't --

2 MS. FEOLA-GUERRIERI: Objection.

3 A I don't understand the question.

4 BY MS. BAIRD:

5 Q Well, what effect, if any, does the
6 classification of an allegation as A or B have on the
7 investigation?

8 MS. FEOLA-GUERRIERI: Objection.

9 MS. HARRIS: Objection.

10 You can answer.

11 A It would determine who would be investigating;
12 whether it stayed internally within Internal Affairs or
13 was assigned to the field for investigation.

14 BY MS. BAIRD:

15 Q Which class allegation, A or B, is assigned to
16 the field?

17 A B complaints.

18 Q And are A complaints investigated by Internal
19 Affairs?

20 A Yes.

21 Q Was that the procedure in place when you became
22 commander in October 2014?

23 A Yes.

24 Q What training did you receive prior to October
25 of 2014 that prepared you for your duties as commander of

1 the I.A.D.? Specifically. You can list all your training
2 if you want, but I'm really asking specific to I.A.D.

3 A I believe that's supervisory training. Basic
4 and advanced interview and interrogation. Took a few
5 more courses the year I was -- in 2014 prior to going up
6 there as well. Supervising a detective bureau training I
7 believe was that year as well.

8 Q Did you conduct any I.A.D. investigations while
9 you were out in the field?

10 A No.

11 Q I'm pulling out Exhibit 61C. Directing your
12 attention to the last two pages of Exhibit 61C, it should
13 be e-mails. We'll start with the last page of 61C.

14 A Mm-hmm.

15 Q Have you seen the e-mails reflected in the last
16 page of Exhibit 61C?

17 MS. FEOLA-GUERRIERI: Objection. Are you
18 asking now or previously?

19 MS. BAIRD: Previously. Previously.

20 MS. HARRIS: Again, outside of anything you
21 and I have discussed.

22 A No.

23 BY MS. BAIRD:

24 Q Who is Anlinda Y. Knight; if you know?

25 A She was my administrative assistant.

1 Q When did she stop being your administrative
2 assistant?

3 A July of 2016 maybe?

4 Q Was she the administrative -- was she an
5 administrative assistant in the I.A.D. when you came on as
6 commander in October 2014?

7 A Yes, ma'am.

8 Q And what were her duties between October 2014
9 and when she was no longer there in July 2016?

10 A She would handle confidential secretary tasks,
11 including she'd handle citizen complaint paperwork, form
12 letters, things like that. Telephone calls, filing.

13 Q Do you know -- let me put it this way. Back
14 in -- limit the time period. Between October 2014 and
15 March of 2015, were you aware of an individual by the name
16 of Jacqueline Manning-Bainer?

17 A Perhaps.

18 Q Between September -- October of 2014 and March
19 of 2015, were you aware of a company called Integrated
20 Security Services?

21 A Yeah.

22 Q Did you have any awareness of Integrated
23 Security Services prior to October of 2014?

24 A No.

25 Q And what was the reason -- or how did you become

1 aware of -- I'll call it "ISS"; okay? How did you become
2 aware of ISS between October 2014 and March 2015?

3 A I would have known through -- because of the
4 Civilian Review Board, that they did the investigations
5 for them -- citizen complaint investigations.

6 Q Did you have any knowledge in 2014 or 2015 that
7 ISS was conducting an investigation of Mr. Peruta's
8 complaint?

9 A No.

10 Q Did you have any knowledge in -- after October
11 2014, that Integrated Security Services had requested
12 information from Ms. Knight about Mr. Peruta's complaint?

13 A No.

14 MS. HARRIS: Objection to the form.

15 THE WITNESS: Okay.

16 MS. HARRIS: You can answer.

17 BY MS. BAIRD:

18 Q Did Ms. Knight ever bring it to your attention
19 that ISS was requesting information about Mr. Peruta's
20 complaint?

21 A Not that I recall, no.

22 Q What records or documents or information, if you
23 know, was shared with ISS concerning Mr. Peruta's
24 complaint?

25 A I don't know.

1 Q Do you know if on October 21st, 2014, you had
2 yet become the commander of the I.A.D.? Was there an
3 exact date that you recall when you took on the position?

4 A I don't recall. I believe I was promoted to the
5 rank of lieutenant on October 19th. I don't know if it
6 was a transition time. I'm not -- I'm not really sure
7 when I exactly went up there and started.

8 Q Has anyone replaced Ms. Knight in the
9 position --

10 A Yes.

11 Q -- that she held?

12 A Yes.

13 Q Who has replaced her?

14 A Ms. Deitra Bush.

15 Q Did the HPD Internal Affairs department have an
16 operational manual when you came on board in October 2014?

17 A Yes.

18 Q Has that manual been updated or revised or
19 amended since that time?

20 A I might have made changes to it. I'm not sure.

21 Q Other than Sergeant Spell, whom you identified
22 from the video that you watched on the Internet, were
23 there other officers that you viewed on the Internet at
24 the scene of the complaint made by Mr. Peruta in 14-100?

25 A Yes.

1 Q And did you identify any of those officers?

2 A No.

3 Q Why not?

4 MS. HARRIS: Objection.

5 MS. FEOLA-GUERRIERI: Objection.

6 BY MS. BAIRD:

7 Q Was there a reason why not?

8 A No.

9 Q Do you know if Sergeant Spell was interviewed
10 related to I.A.D. Case 14-100?

11 A Yes.

12 Q Do you know if any officers at the scene of the
13 complaint that was made by Mr. Peruta were interviewed?

14 A I don't know.

15 Q And just to be clear, even though Lieutenant
16 O'Brien did the investigation in 14-100, is it I.A.D. that
17 maintains the file for Case No. 14-100?

18 A Yes, ma'am.

19 Q Are there any recordings, in the I.A.D. file for
20 14-100, of the interview conducted of Sergeant Spell by
21 Lieutenant O'Brien?

22 A Not that I recall, no.

23 Q Were you part of the decision made by Lieutenant
24 O'Brien to not record the interview conducted of Sergeant
25 Spell related to Case No. 14-100?

1 MS. FEOLA-GUERRIERI: Objection.

2 MS. HARRIS: Form.

3 You can answer.

4 A No.

5 BY MS. BAIRD:

6 Q Does the HPD I.A.D. ever record interviews?

7 A Yes.

8 Q When?

9 MS. FEOLA-GUERRIERI: Objection.

10 MS. HARRIS: Join.

11 You can answer.

12 A We generally record all of our interviews in

13 I.A.D.

14 BY MS. BAIRD:

15 Q And when did that begin; if you know?

16 A It's been standard practice since I took over.

17 I'm sure it's -- I'll leave it at that.

18 Q When you came on board in October 2014 as
19 commander of the I.A.D., did you review any audits or
20 findings recommending that the HPD I.A.D. record
21 interviews?

22 MS. HARRIS: Objection to the form.

23 MS. FEOLA-GUERRIERI: Objection.

24 MS. HARRIS: You can answer if you

25 understand.

1 A I'm sorry. Repeat the question?

2 BY MS. BAIRD:

3 Q When you came on board as the commander of the
4 I.A.D. in October 2014, did you review any previous audits
5 that had been done of the HPD I.A.D.?

6 MS. HARRIS: Again objection.

7 But you can answer.

8 MS. FEOLA-GUERRIERI: Objection.

9 A Yes, I have. Since I took over as commander,
10 yes.

11 BY MS. BAIRD:

12 Q And did that -- did any of these audits make
13 recommendations with regard to recording interviews?

14 MS. FEOLA-GUERRIERI: Objection.

15 MS. HARRIS: Objection.

16 You can answer.

17 A I don't specifically recall.

18 BY MS. BAIRD:

19 Q Have you discussed with Lieutenant O'Brien his
20 decision not to record the interview of Sergeant Spell
21 related to Case No. 14-100?

22 A No.

23 MS. FEOLA-GUERRIERI: Objection to form.

24 MS. HARRIS: Let me get the objection out
25 before you answer so that she's not clear,

1 but --

2 THE WITNESS: I'm sorry.

3

4 MS. HARRIS: -- but you can answer her
5 question.

6 A No.

7 BY MS. BAIRD:

8 Q Have you discussed with Lieutenant O'Brien his
9 decision not to interview any other officers who were at
10 the scene on September 12th, 2014, related to Mr. Peruta's
11 complaint?

12 MS. FEOLA-GUERRIERI: Objection.

13 MS. HARRIS: Objection.

14 You can answer.

15 A No.

16 MS. BAIRD: This will be the next exhibit,
17 70.

18

19 [Plaintiff Exhibit 70: Marked for ID.]

20

21 MS. FEOLA-GUERRIERI: I'm just going to
22 excuse myself, but you can proceed.

23

24 [Ms. Feola-Guerrieri left proceedings.]

25

1 BY MS. BAIRD:

2 Q Lieutenant Coates, do you recognize the
3 individual in Exhibit 70?

4 A I do.

5 Q And who is that?

6 A I believe it's Officer Marfella.

7 Q And is your recognition of Officer Marfella
8 unrelated to this case?

9 A Yes.

10 Q Okay. Have you worked with Officer Marfella
11 before?

12 A Yes. I know --

13 Q Have you seen him around the police department?

14 A Yes.

15 Q And if you had seen Exhibit 70 back in October
16 of 2014, would you have recognized him then?

17 A Yes.

18 Q You didn't just meet him after October 2014, is
19 what I'm getting at.

20 A No.

21 Q You knew him before then.

22 A Yes.

23 MS. BAIRD: Next exhibit.

24

25 [Plaintiff Exhibit 71: Marked for ID.]

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[Ms. Feola-Guerrieri rejoined proceedings.]

BY MS. BAIRD:

Q Exhibit 71. Do you recognize the individual in that photo?

MS. HARRIS: Objection.

MS. BAIRD: 71.

MS. HARRIS: Which individual? It depicts multiple.

BY MS. BAIRD:

Q Okay. Let me see that. Yes.

The individual in the left corner, as you look at Exhibit 71, in the forefront of the picture facing the picture, with a baseball cap on and a white -- some sort of white collar.

A It looks like Off -- yes.

Q And who is it?

A It looks like Officer Ricardo Colon.

Q And have you seen Officer Colon in the course of your duties with the Hartford Police Department?

A Yes.

Q And did you know Officer Colon prior to October 2014?

A I'm not sure.

1 Yes, I did. I did know him prior to 2014.

2 Q Does the HPD I.A.D. maintain a database or
3 records of photographs of Hartford police officers?

4 A Yes.

5 Q For what purpose or purposes?

6 A For identification.

7 Q Do you know if related to Case No. 14-100
8 Integrated Security Services ever requested an opportunity
9 to look at that book?

10 A No.

11 Q What information that I.A.D. had concerning Case
12 No. 14-100 was available to Integrated Security Services?

13 MS. FEOLA-GUERRIERI: Objection.

14 MS. HARRIS: Objection.

15 BY MS. BAIRD:

16 Q In October of 2014 through March of 2015.

17 MS. FEOLA-GUERRIERI: Objection.

18 MS. HARRIS: Again I object.

19 You can answer.

20 A Specifically they would have gotten the citizen
21 complaint and the Hartbeat information or dispatch
22 summary.

23 BY MS. BAIRD:

24 Q Between October 2014 and March of 2015, would
25 any of the reports related to the incident that occurred

1 on September 12th, 2014, in the vicinity of Park and
2 Hungerford Streets been made available to ISS?

3 MS. HARRIS: Objection.

4 You can answer.

5 A No.

6 BY MS. BAIRD:

7 Q Why not?

8 A My understanding it was an active homicide
9 investigation.

10 Q Okay. Is that a written policy of the HPD that
11 the independent investigator for the Board would not
12 receive information if there was an active homicide
13 investigation?

14 MS. FEOLA-GUERRIERI: Objection to the
15 form.

16 MS. HARRIS: Objection.

17 You can answer.

18 A I don't believe there's a policy. No.

19 BY MS. BAIRD:

20 Q Okay. On what basis or grounds do you rely on
21 to state that information concerning the events of
22 September 12th, 2014, that the I.A.D. had, would not have
23 been made available to ISS or the independent investigator
24 because there was an active homicide investigation?

25 MS. FEOLA-GUERRIERI: Objection.

1 MS. HARRIS: Objection.

2 A I don't understand the question.

3 BY MS. BAIRD:

4 Q Well, when you became commander of the I.A.D. in
5 2014, were you verbally told by someone at HPD that if
6 there is an active homicide investigation, don't give
7 records to the independent investigator if they are
8 looking at a complaint related to an active homicide
9 investigation?

10 MS. FEOLA-GUERRIERI: Objection.

11 MS. HARRIS: Objection.

12 MS. FEOLA-GUERRIERI: Any
13 attorney/client-privileged communications
14 inquiry I would instruct him not to answer if
15 it's based on legal advice.

16 MS. BAIRD: Well, it's not. I'm talking
17 about HPD --

18 MS. FEOLA-GUERRIERI: Well, I mean
19 they're -- same objection.

20 MS. HARRIS: Yes. You can answer anything
21 outside of an attorney/client communication.

22 THE WITNESS: Okay.

23 A I understand what you're getting at. No, I
24 don't believe I was told by anybody.

25

1 BY MS. BAIRD:

2 Q Okay. What are the reasons then, sitting here
3 today, why the I.A.D. did not or does not provide its
4 records or records pertaining to an active homicide
5 investigation to the independent investigators for the
6 Board?

7 MS. FEOLA-GUERRIERI: Objection. Form.

8 MS. HARRIS: Objection.

9 You can answer.

10 A Repeat the question, please. I'm sorry.

11 BY MS. BAIRD:

12 Q Sure. What are the reasons, if you know, why
13 there is this -- I don't know what to call it -- why you
14 follow this procedure of not providing reports pertaining
15 to active homicide investigations to independent
16 investigators looking at complaints about I.A.D.
17 complaints?

18 MS. HARRIS: Objection.

19 But you can answer.

20 A Okay. To the best of my knowledge, I was
21 never -- nobody ever requested those reports from me.

22 BY MS. BAIRD:

23 Q To your knowledge, has there been a statement
24 communicated to Integrated Security Services that reports
25 will not be provided to them if an active homicide

1 investigation is proceeding?

2 MS. FEOLA-GUERRIERI: Objection.

3 MS. HARRIS: Objection.

4 You can answer.

5 MS. FEOLA-GUERRIERI: Are you asking if
6 he's ever said that to them or --

7 MS. BAIRD: To his knowledge as commander.

8 A No.

9 BY MS. BAIRD:

10 Q Okay. And is there such a written or unwritten
11 policy in the I.A.D. to prohibit the release or disclosure
12 of reports pertaining to cases involving active homicide
13 investigations --

14 MS. FEOLA-GUERRIERI: Objection.

15 MS. HARRIS: Objection.

16 BY MS. BAIRD:

17 Q -- to the independent investigators performing
18 work on behalf of the Board?

19 MS. FEOLA-GUERRIERI: Objection.

20 MS. HARRIS: Again objection to form.

21 You can answer.

22 A I would not release them to the Board or to the
23 investigator, no.

24 BY MS. BAIRD:

25 Q Why not?

1 A Because it's an active homicide investigation.

2 MS. BAIRD: This is the next exhibit.

3

4 [Plaintiff Exhibit 72: Marked for ID.]

5

6 BY MS. BAIRD:

7 Q Do you recognize the individual -- as you look
8 at Exhibit 72, he's on the far right and he has his right
9 hand raised?

10 A No.

11 Q What procedure, if any, does the I.A.D. have to
12 determine whether the individual in Exhibit 72 is a
13 Hartford police officer?

14 MS. FEOLA-GUERRIERI: Objection.

15 MS. HARRIS: Objection.

16 You can answer.

17 A We look at a dispatch summary to see who
18 responded out there, and we just go through the list,
19 show this picture. Somebody would probably eventually be
20 able to identify who that was or come forward and say,
21 "That was me."

22 BY MS. BAIRD:

23 Q These are Exhibits 4 and 5. Are Exhibits 4 and
24 5 dispatch summaries for the Hartford Police Department?

25 A Yes, ma'am.

1 Q And can you tell what date or dates the events
2 occurred that these dispatch summary records refer to?

3 A September 12th, 2014.

4 Q And I believe you had indicated that in addition
5 to the citizen's complaint, that dispatch summary records
6 would be made available to independent investigators?

7 A They generally are, yes.

8 Q And when you say "generally," in particular with
9 regard to Mr. Peruta's complaint No. 14-100 is there any
10 reason why the dispatch summary record in Exhibits 4 and 5
11 would not have been made available to the independent
12 investigator?

13 MS. FEOLA-GUERRIERI: Objection.

14 MS. HARRIS: Objection.

15 You can answer.

16 A I don't know.

17 BY MS. BAIRD:

18 Q Well, you agree that in October of 2014 there
19 was an active homicide investigation regarding the
20 9/12/2014 incident?

21 A I believe it was still ongoing, yes.

22 Q Would that have been a reason not to provide the
23 independent investigators for the Board the dispatch
24 summary report reflected in Exhibits 4 and 5?

25 A No, not necessarily.

1 MS. BAIRD: This is marked as the next
2 exhibit.

3
4 [Plaintiff Exhibit 73: Marked for ID.]

5

6 BY MS. BAIRD:

7 Q This is Exhibit 73. Do you recognize the
8 individual portrayed in Exhibit 73 in the middle of the
9 picture with a white shirt and he's looking to his left?

10 A Yes.

11 Q And who is that?

12 A Retired Sergeant Sean Spell.

13 Q And did you know retired Sergeant Sean Spell
14 prior to October 2014?

15 A Yes.

16 Q In Exhibit 73, as you look at it there's an
17 officer on the left of the photograph -- a close-up in the
18 corner. Do you recognize that officer?

19 A I believe it's Sergeant Sean Michel.

20 Q And did you know Sergeant Michel prior to
21 October 2014?

22 A Yes.

23 Q In Exhibit 73, on the right of the picture where
24 you just see the officer's head, not his entire body, and
25 that officer seems to be looking to the left and he has an

1 HPD hat on, a uniform hat, do you know who that is?

2 A I believe -- yes.

3 Q Who is that?

4 A I believe it's Officer Barone.

5 Q And then finally in Exhibit 73, on the far right
6 there is a uniformed officer. You can see his entire body
7 from head to foot. He's walking in the street. Do you
8 recognize him?

9 A No.

10 Q And again with regard to I.A.D. 14-100, do you
11 have any independent knowledge whether Lieutenant O'Brien
12 contacted Sergeant Michel with regard to Mr. Peruta's
13 complaint?

14 A No.

15 Q Do you have any independent knowledge of whether
16 Lieutenant O'Brien contacted Officer Barone with regard to
17 Mr. Peruta's complaint?

18 A No.

19 Q Have you seen anything in Case No. 14-100 that
20 records or memorializes any contact made with Officer
21 Barone related to Case No. 14-100?

22 MS. HARRIS: Objection to the form.

23 You can answer if you understand.

24 A Not that I recall, no.

25

1 BY MS. BAIRD:

2 Q Okay. Have you seen any information in Case
3 No. 14-100, the file that you maintain, whether any
4 contact was made or portraying any contact by Lieutenant
5 O'Brien with Sergeant Michel related to the investigation?

6 A Not that I recall, no.

7 [Mr. Peruta joined proceedings.]

8 BY MS. BAIRD:

9 Q Do you know if anyone assisted Lieutenant
10 O'Brien with the investigation?

11 A I don't know.

12 Q Did anyone in I.A.D. assist Lieutenant O'Brien
13 with the investigation?

14 A Not that I know of, no.

15 Q And the eight sergeants that you testified were
16 in I.A.D. when you joined in October 2014 -- and there may
17 be one less now -- do they investigate I.A.D.s --
18 complaints?

19 A Seven. Yes.

20 Q And is the investigation of I.A.D. complaints
21 their job duty?

22 A One of them, yes.

23 Q Do the job duties among the seven sergeants
24 differ?

25 A No.

1 Q And other than investigating I.A.D. complaints,
2 what are their job duties?

3 A Investigate internal complaints,
4 officer-involved shootings, conduct inspections, handle
5 criminal cases as well, political corruption cases.
6 City -- other city employees of the city department
7 criminal investigations.

8 MS. BAIRD: Next exhibit.

9
10 [Plaintiff Exhibit 74: Marked for ID.]

11

12 BY MS. BAIRD:

13 Q Exhibit 74. Do you recognize the officer in
14 Exhibit 74 who is at the forefront and he's looking to the
15 right and he has a uniform hat on?

16 A Looks like Officer Barone again? I'm not
17 positive.

18 Q When you viewed the video on the Internet and
19 identified Sergeant Spell, did you identify any other
20 officers from the video?

21 MS. HARRIS: Objection. Asked and
22 answered.

23 You can answer.

24 A I don't recall.

25

1 BY MS. BAIRD:

2 Q Do you know if other officers were in the video?

3 A Yes.

4 Q Did you recognize the other officers in the
5 video when you viewed it?

6 MS. HARRIS: Objection.

7 You can answer.

8 A I don't recall.

9 BY MS. BAIRD:

10 Q Did you take any action to attempt to identify
11 other officers besides Sergeant Spell in the video?

12 MS. HARRIS: Objection.

13 You can answer.

14 A No.

15 BY MS. BAIRD:

16 Q Did you identify any civilian witnesses in the
17 video?

18 A No.

19 MS. BAIRD: The next exhibit.

20

21 [Plaintiff Exhibit 75: Marked for ID.]

22

23 BY MS. BAIRD:

24 Q Lieutenant Coates, your name appears on
25 Exhibit 75 at the bottom of the first page; correct?

1 A Correct.

2 Q And were you aware that your name appears there?

3 A I was.

4 Q Okay. And do you know what pages one and two of
5 Exhibit 75 are taken from?

6 MS. FEOLA-GUERRIERI: Objection.

7 MS. HARRIS: Join, but you can answer.

8 A The police department's Web site.

9 BY MS. BAIRD:

10 Q Did you have any input into the information
11 provided on the first page of Exhibit 75?

12 A Yes.

13 Q Did you have any input into the information
14 provided in the block on page 75 under "Guide to Filing a
15 Citizen Complaint"?

16 MS. HARRIS: Objection.

17 You can answer.

18 A Yes.

19 BY MS. BAIRD:

20 Q And what input did you have into the information
21 provided in that block "Guide to Filing a Citizen
22 Complaint"?

23 MS. HARRIS: Again objection. I'm just
24 going to object to the line of relevance in
25 general.

1 You can answer, but this is dated today.

2 So relevance to this case is questionable. But
3 you can answer the question.

4 A I reviewed it, and I believe -- just for
5 content -- and I think I found one -- maybe one or two
6 grammatical errors.

7 BY MS. BAIRD:

8 Q When you became commander of the I.A.D. in
9 October of 2014, was the method of making an I.A.D.
10 complaint through an e-mail available?

11 A Yes.

12 Q And was that e-mail address
13 PoliceIAD@Hartford.gov?

14 A Yes.

15 Q When you became commander of the I.A.D. in
16 October 2014, was the method of making an I.A.D. complaint
17 by mail to the commander of I.A. available?

18 A Yes.

19 Q When you became commander of the I.A.D. in
20 October 2014, was the method of making an I.A.D. complaint
21 in person at the Hartford Police headquarters available?

22 A Yes.

23 Q When you became commander of the I.A.D. in
24 October 2014, was the method of telephoning HPD I.A.
25 directly available?

1 A Yes.

2 Q And when you became commander of the I.A.D. in
3 October 2014, was the method of mailing to the City of
4 Hartford Office of Corporation Counsel method available?

5 A Yes.

6 MS. BAIRD: Next exhibit.

7

8 [Plaintiff Exhibit 76Marked for ID.]

9

10 BY MS. BAIRD:

11 Q Exhibit 76.

12 MS. HARRIS: Do you intend to be using that
13 highlighted?

14 MS. BAIRD: That's all I've got. I can go
15 over it with him. I can ask him.

16 MS. HARRIS: Well, I just didn't know if
17 you wanted us having your highlights.

18 MS. BAIRD: Oh, I don't care.

19 MS. HARRIS: Okay.

20 MS. BAIRD: That's fine.

21 BY MS. BAIRD:

22 Q Have you seen Exhibit 76 previously, Lieutenant
23 Coates?

24 A Yes.

25 Q And do you know if Exhibit 76 is the most recent

1 version of the Civilian Police Review Board Bylaws?

2 A I believe it is, yes.

3 MS. FEOLA-GUERRIERI: Just for the record,
4 it says it's page -- the last page says that
5 it's page 11 of 14, and there's only 11 pages
6 here.

7 MS. BAIRD: That's true. Thank you.

8 BY MS. BAIRD:

9 Q Have you attended Civilian Review Board
10 meetings?

11 A Yes.

12 Q For any reason did you follow Case 14-100 to
13 determine what happened at the Civilian Review Board?

14 A No.

15 Q Other than Integrated Security Services, are you
16 aware of other independent investigators who have been
17 assigned to cases by the Civilian Review Board since
18 October 2014?

19 A Yes. I think there might have been one or two
20 other companies. I can't recall.

21 Q What role, if any, did you have regarding Case
22 14-100 in assisting or working with the Board's
23 independent investigators investigating Mr. Peruta's
24 complaint?

25 A None that I recall.

1 Q Did you have any knowledge of when the Board's
2 independent investigators were investigating Mr. Peruta's
3 complaint?

4 A No.

5 MS. FEOLA-GUERRIERI: Objection to form.

6 A No.

7 BY MS. BAIRD:

8 Q Is there any duty or obligation by the Board's
9 independent investigators, that you know of, to notify
10 I.A.D. when they're investigating a complaint?

11 MS. HARRIS: I'm going to object.

12 You can answer.

13 A No.

14 BY MS. BAIRD:

15 Q Did the Board's independent investigator,
16 Integrated Security Services, interview Sergeant Spell
17 related to Case No. 14-100?

18 MS. HARRIS: Objection.

19 MS. FEOLA-GUERRIERI: Objection.

20 A I don't know.

21 BY MS. BAIRD:

22 Q Other than the e-mail that -- I don't know if
23 you still have it in front of you, 61C -- we already spoke
24 about, do you know of any other contact that the Board's
25 independent investigator had with the Hartford Police

1 Department about Case No. 14-100?

2 A I don't recall any, no.

3 Q What effect, if any, is there on an I.A.D.
4 investigation if notice of a lawsuit or claim has been
5 filed?

6 MS. FEOLA-GUERRIERI: Objection to form.

7 MS. HARRIS: Objection.

8 You can answer.

9 A None.

10 BY MS. BAIRD:

11 Q Is it fair to say the investigation proceeds?

12 A Yes.

13 Q And again I'm just referring to your course of
14 duties as a commander of I.A.D. What reason was there for
15 you to review Case No. 14-100 when you learned of a
16 lawsuit?

17 MS. HARRIS: Objection. Direct him not to
18 answer. Attorney/client privilege.

19 MS. BAIRD: Okay.

20 THE WITNESS: Mind if we take a restroom
21 break?

22 MS. BAIRD: Oh, yes.

23

24 [Off record: 11:56 a.m. to 12:03 p.m.]

25

1 BY MS. BAIRD:

2 Q Okay, Lieutenant. Are you ready?

3 A Yes, ma'am.

4 Q A few more questions here.

5 Do you know Kim Taylor?

6 A I do.

7 Q And when did you meet her in the course of your
8 duties as a Hartford Police Department sworn officer?

9 A It would have been early on. Probably the month
10 I was promoted.

11 Q And that would have been October 2014?

12 A Correct.

13 Q And do you contact -- since October 2014, have
14 you been in contact with Ms. Taylor related to your duties
15 as a commander of I.A.D.?

16 A Yes.

17 Q And what necessitates -- or what is the nature
18 of the contacts you've had with Ms. Taylor since October
19 of 2014 related to being a commander of the I.A.D.?

20 A Citizen complaints we discuss.

21 Q And what is the nature of those discussions?

22 MS. FEOLA-GUERRIERI: Objection.

23 MS. HARRIS: You can answer.

24 MS. FEOLA-GUERRIERI: Are you asking about
25 a particular?

1 BY MS. BAIRD:

2 Q Well, what kinds of discussions do you have with
3 Ms. Taylor related to the I.A.D. citizen complaints?

4 A Oh, she might need additional information or
5 reports, or I might need something from her. Or she --
6 and she routinely sends me complaints as well that get
7 turned in to City Hall that get forwarded to me.

8 Q When you became commander of the I.A.D. in
9 October 2014, had you met Mr. Peruta prior?

10 A No.

11 Q Between October 2014 and March of 2015, did you
12 personally meet Mr. Peruta at any time?

13 A I'm not sure if we personally met. I know we
14 spoke on the phone.

15 Q Okay. And sitting here today, are you aware the
16 person to my left is Ed Peruta?

17 A I am.

18 Q And prior to today had you ever seen Mr. Peruta
19 before?

20 A Yes.

21 Q And when was the last time you had seen
22 Mr. Peruta prior to today?

23 A Maybe the summer of 2015? I'm not sure.

24 Q And that occasion when you saw Mr. Peruta
25 perhaps in the summer of 2015, did it relate to Case

1 No. 14-100?

2 A No.

3 Q What did it relate to?

4 A An F.O.I. request, I believe.

5 Q Was that occasion the first time you had
6 directly met and been in the presence of Mr. Peruta?

7 A Yes.

8 Q You mentioned that you had spoken to him on the
9 phone. Did that conversation or conversations occur prior
10 to meeting him in person?

11 A Yes.

12 Q And how many conversations were there?

13 A I don't -- I don't know.

14 Q Could it have been one?

15 A No, it was --

16 MS. FEOLA-GUERRIERI: Objection. He's
17 already said he doesn't know.

18 MS. BAIRD: Okay. Well, I mean I'm going
19 to try to narrow it down.

20 BY MS. BAIRD:

21 Q Could it have been more than one?

22 MS. FEOLA-GUERRIERI: How could you narrow
23 that down, "I don't know"? Objection.

24 BY MS. BAIRD:

25 Q Well, was it just one?

1 MS. FEOLA-GUERRIERI: Objection.

2 BY MS. BAIRD:

3 Q You can answer.

4 MS. HARRIS: You can answer.

5 A It was more than one.

6 BY MS. BAIRD:

7 Q Okay. So you remember it was more than one.

8 A Yes.

9 Q Okay. I'll try to make my questions clearer.

10 A Thank you.

11 Q And were -- did any phone conversation that you
12 had with Mr. Peruta pertain to Case No. 14-100?

13 A I believe they would have, yes.

14 Q Okay. And do you recall what -- did you call
15 Mr. Peruta at any time or did he call you?

16 A I don't recall who called who.

17 Q And did you provide any information to
18 Mr. Peruta over the phone related to Case No. 14-100?

19 A I can't remember.

20 Q Did Mr. Peruta provide you any information over
21 the phone when he called? If he called.

22 MS. HARRIS: Objection.

23 BY MS. BAIRD:

24 Q When you called. Whenever you spoke to him over
25 the phone.

1 MS. HARRIS: Objection to the form.

2 You can answer.

3 A Yes, I know on one occasion, because we were in
4 contact because I didn't have a DVD or a working copy of
5 a DVD, and I think he directed me to YouTube to view it.

6 MS. BAIRD: Is Exhibit -- I'm speaking to
7 Mr. Peruta now.

8 Is Exhibit 24 in that computer?

9 MR. PERUTA: No.

10 MS. BAIRD: No. Okay.

11 MR. PERUTA: Exact files are on the hard
12 drive of the computer --

13 MS. BAIRD: Okay.

14 MR. PERUTA: -- which I explained to
15 Attorney Harris prior to the deposition.

16 MS. BAIRD: Okay. If I can just have a
17 moment.

18 Can we just go off the record because I
19 need to inquire of the Court Reporter about an
20 exhibit. If that's okay.

21 MS. HARRIS: Yeah.

22

23 [Off record: 12:08 p.m. to 12:13 p.m.]

24

25

1 BY MS. BAIRD:

2 Q Lieutenant Coates, this is Exhibit 63. I'm
3 going to show you the first file on Exhibit 63 that's
4 entitled "9/12/2014 Hartford Shooting and the." That's
5 what we can see on the TV in front of us. Can you see it
6 okay?

7 A Yes.

8 Q And I'll just let it play, and then I'll ask you
9 what I'm going to ask you. Okay?

10 A Okay.

11 [Video Played.]

12 BY MS. BAIRD:

13 Q The video from Exhibit 64 --

14 MS. HARRIS: 63.

15 BY MS. BAIRD:

16 Q -- from 63 that's entitled 9/12/2014 Hartford
17 Shooting," have you seen that before?

18 A I have.

19 Q Is that the video you've referenced in your
20 testimony today a couple of times as the video you saw on
21 the Internet of the incident from 9/12/2014?

22 A I'm not sure.

23 Q Do you know when you viewed this video in
24 Exhibit 63?

25 MS. HARRIS: And anything outside of

1 contacts with your attorney.

2 A No.

3 BY MS. BAIRD:

4 Q Do you know if you viewed it prior to March of
5 2015?

6 A I could have.

7 Q Was the video that we just saw in Exhibit 63 the
8 video where you were able to identify Sergeant Spell and
9 pass on -- and use that information to assign Lieutenant
10 O'Brien to the investigation?

11 A It could --

12 MS. FEOLA-GUERRIERI: Objection. He's
13 never said that he'd even seen this video
14 before.

15 MS. BAIRD: Well, let's clarify that.

16 BY MS. BAIRD:

17 Q Have you seen the video that we just watched in
18 Exhibit 63?

19 A It looks familiar, yes.

20 MS. BAIRD: I thought he had said he -- can
21 I have that read back to me? Because I just
22 want to clarify --

23 MS. FEOLA-GUERRIERI: He said he saw
24 something on YouTube.

25 MS. BAIRD: Okay.

1 MS. FEOLA-GUERRIERI: He didn't say he saw
2 this.

3 MS. BAIRD: After we finished watching the
4 video can we have the questions read back that I
5 asked him? Because I don't remember.

6
7 [Last 4 questions and answers read back by
8 reporter.]

9
10 BY MS. BAIRD:

11 Q Did you make -- do you have any notes related to
12 the video that you viewed that allowed you to identify
13 Sergeant Spell in the I.A.D. file at the Hartford Police
14 Department?

15 A No, ma'am.

16 Q When you viewed the video that allowed you to
17 identify Sergeant Spell, were you with anyone?

18 A I don't recall.

19 Q When you viewed the video that allowed you to
20 identify Sergeant Spell, where were you?

21 A I'm assuming my office?

22 Q When you viewed the video that allowed you to
23 identify Sergeant Spell -- okay. Let me strike that.

24 The video that we just watched in Exhibit 63, do
25 you agree that Officer Barone was portrayed in that

1 video?

2 A Yes.

3 Q And do you agree that Officer Marfella was
4 portrayed in that video?

5 A Yes.

6 Q When you viewed the video that allowed you to
7 identify Sergeant Spell and convey that to Lieutenant
8 O'Brien or assign Lieutenant O'Brien to the case, did that
9 video also include Officer Barone?

10 A I don't recall.

11 Q Okay. And the video that allowed you to
12 identify Sergeant Spell, did that video contain or portray
13 Officer Marfella?

14 A I don't recall.

15 Q So sitting here today, the video that you
16 watched on the Internet that you're not sure is the same
17 video in Exhibit 63, the officer that you recall
18 identifying is Sergeant Spell.

19 A Correct.

20 Q Okay. Did you convey to --

21 MS. FEOLA-GUERRIERI: Want me to turn the
22 light on?

23 MS. BAIRD: Oh, yeah. Go ahead.

24 MS. FEOLA-GUERRIERI: Fall asleep.

25

1 BY MS. BAIRD:

2 Q Did you convey to Mr. Peruta the results of the
3 Hartford Police Department's investigation of Case
4 No. 14-100? Did you convey that?

5 MS. HARRIS: You mean him personally?

6 MS. BAIRD: Yes.

7 A I don't recall if I did.

8 BY MS. BAIRD:

9 Q Okay. Did you convey to Mr. Peruta the results
10 of the independent investigator's investigation into the
11 complaint made by Mr. Peruta related to September 12th,
12 2014?

13 MS. HARRIS: Objection.

14 You can answer.

15 A No, I don't -- no, I don't recall talking about
16 that.

17 BY MS. BAIRD:

18 Q At any time -- and we're just talking about any
19 time prior to your knowledge of the pending lawsuit -- did
20 you learn of the results of the investigation conducted by
21 the Board's independent investigator into Mr. Peruta's
22 complaint about September 12th, 2014?

23 A Prior to the lawsuit?

24 Q Yes.

25 A No, I don't believe so.

1 MS. BAIRD: Okay. No further questions.

2 All set. From me. Thank you.

3 THE WITNESS: Thank you.

4 MS. FEOLA-GUERRIERI: Are you --

5 MS. HARRIS: I just have one quick
6 question. Can you grab Exhibit 22, please? Or
7 it might have been 45. Sorry, 45.

8

9 CROSS-EXAMINATION

10

11 BY MS. HARRIS:

12 Q If you turn to the last page, Attorney Baird had
13 asked you about -- a series of questions about the
14 findings of the report.

15 I'm sorry. Flip to the page that's listed page
16 four of -- page four. Under Section 5, "Investigative
17 Summary and Findings," does that section continue from
18 page four to page five?

19 A Yes.

20 Q So there's more than one sentence of findings in
21 that report; correct?

22 A Yes.

23 Q All right. And directing your attention to the
24 bottom of page four, the last sentence on page four which
25 continues into page five, does Lieutenant O'Brien address

1 that Mr. Peruta had made a First Amendment -- raised a
2 First Amendment concern?

3 A Yes.

4 Q Okay. And continuing on to page five, at the
5 top, the second sentence -- or the first full sentence,
6 continuing through the end of that paragraph, does
7 Lieutenant O'Brien address Mr. Peruta's concern that he
8 was threatened with arrest, without precisely using those
9 words?

10 A Yes.

11 MS. HARRIS: No further questions.

12 MS. FEOLA-GUERRIERI: I just have a couple
13 of follow-up.

14

15 CROSS-EXAMINATION

16

17 BY MS. FEOLA-GUERRIERI:

18 Q You were previously asked questions by
19 plaintiff's counsel about the variety of reasons why
20 documents comprising an ongoing homicide investigation may
21 not be produced to the investigator -- the private
22 investigator for the Civilian Review Board. Do you
23 remember those questions?

24 A Yes.

25 Q And would one reason be that the independent

1 investigator for the Civilian Review Board -- one reason
2 why documents would be produced on an ongoing criminal
3 investigation to the administrative investigator here,
4 would one reason be that they didn't ask for it?

5 A Yes.

6 Q Okay. Would another reason be that providing
7 such information would compromise the integrity of an
8 ongoing criminal investigation?

9 A Yes.

10 Q And does the manner in which administrative
11 investigations are conducted by the Hartford Police
12 Department's Internal Affairs Division involve the
13 exercise of some discretion on the part of the officer
14 investigating?

15 A Yes.

16 MS. FEOLA-GUERRIERI: I have no further
17 questions.

18

19 REDIRECT EXAMINATION

20

21 BY MS. BAIRD:

22 Q Exhibit 45. What are you able to determine,
23 from looking at Exhibit 45, was Lieutenant O'Brien's
24 finding with regard to the Civil Rights Violation alleged
25 by Mr. Peruta?

1 MS. HARRIS: I'll object to the form.

2 If you understand.

3 MS. FEOLA-GUERRIERI: Join.

4 MS. BAIRD: Well, I can start again.

5 BY MS. BAIRD:

6 Q There are specific findings that the I.A.D.
7 makes with regard to allegations brought by a civilian --
8 a complainant; correct?

9 A Correct.

10 Q Okay. Let's see. One of them is exoneration --
11 "exonerated"?

12 A Yes.

13 Q And is one of them "sustained"?

14 A Yes.

15 Q One of them's "not sustained."

16 A Yes.

17 Q One of them is "withdrawn"?

18 A Yes.

19 Q And what's the fifth?

20 A There's "unfounded."

21 Q Okay. Are there any more?

22 A Yes.

23 Q What are the other ones?

24 A "Closed administratively." "Closed on intake."

25 "Partially sustained."

1 Q And of all those we just listed, which finding
2 apply to -- which finding or findings, I don't know, apply
3 to the Civil Rights Violation alleged by Mr. Peruta in
4 Exhibit 31, his Citizen Complaint Form?

5 MS. FEOLA-GUERRIERI: Objection.

6 MS. HARRIS: Objection.

7 You can answer if you know.

8 A I don't know.

9 BY MS. BAIRD:

10 Q And which finding, of the choices we just
11 reviewed, apply to Mr. Peruta's allegation in Exhibit 31,
12 his Citizen Complaint Form, of "Conduct Unbecoming an
13 Officer"?

14 MS. FEOLA-GUERRIERI: Objection.

15 MS. HARRIS: Join.

16 A I don't know.

17 BY MS. BAIRD:

18 Q Could I have all the exhibits you have in front
19 of you? Thank you.

20 A (Handing.)

21 MS. BAIRD: No further questions.

22 MS. FEOLA-GUERRIERI: Thank you.

23

24 [Deposition concluded: 12:30 p.m.]

25

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JURAT

I, OFFICER MICHAEL COATES, have read the foregoing transcript of the testimony given at my deposition on March 24, 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

OFFICER MICHAEL COATES

Subscribed and sworn to before me this _____ day of _____, 2017.

Notary Public

My Commission Expires:_____

REPORTER: Patricia Tyszka
CT Lic. #0046

BY MS. BAIRD: [93]
BY MS. FEOLA-GUERRIERI: [1]
82/15
BY MS. HARRIS: [1] 81/9
MR. PERUTA: [3] 75/8 75/10 75/13
MS. BAIRD: [43] 11/11 12/23 13/8
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