

\*\*\* CONFIDENTIAL \*\*\*

ROCHESTER CITY COUNCIL

IN RE: INDEPENDENT INVESTIGATION INTO |  
 THE CITY OF ROCHESTER'S RESPONSE TO AND |  
 HANDLING OF THE RPD'S MARCH 23, 2020 USE |  
 OF FORCE AGAINST DANIEL PRUDE |  
 \_\_\_\_\_ |

REMOTE DEPOSITION of MAYOR LOVELY WARREN,  
 taken via Zoom on Monday, December 21, 2020,  
 commencing at 9:33 a.m., before Pamela Grimaldi (by  
 Zoom), a Registered Professional Reporter, Certified  
 Realtime Reporter, Certified LiveNote Reporter, and  
 Notary Public within and for the State of New York.

HUDSON COURT REPORTING & VIDEO

1-800-310-1769

**New York**  
**212-273-9911**

**Hudson Court Reporting & Video**  
**1-800-310-1769**

**New Jersey**  
**732-906-2078**

1 A P P E A R A N C E S:

2

EMERY CELLI BRINCKERHOFF

3

ABADY WARD & MAAZEL LLP

4

Attorneys for the City Council of  
Rochester

5

600 Fifth Avenue, 10th Floor  
New York, New York 10020  
212.763.5000

6

BY: ANDREW CELLI, ESQ. (by Zoom)  
acelli@ecbawm.com

7

- and -

8

SCOUT KATOVICH, ESQ. (by Zoom)  
skatovich@ecbawm.com

9

- and -

KATIE ROSENFELD, ESQ. (by Zoom)  
krosenfeld@ecbawm.com

10

11

12

MORRISON FOERSTER

13

Attorneys for the City of Rochester  
and the witness

14

250 West 55th Street  
New York, New York 10019-1601  
212.468.4000

15

16

BY: CARRIE COHEN, ESQ. (by Zoom)  
ccohen@mofoc.com

17

- and -

LILY WESTERGAARD, ESQ. (by Zoom)  
lwestergaard@mofoc.com

18

19

20

21

22

23

24

25



I N D E X P A G E

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Exhibits	Description	Page
17	Transcript of 9/9/20 council briefing	294
18	(Not referenced)	
19	(Not referenced)	
20	Transcript of 9/16/20 Chodak interview Bates Nos. Warren 417 through 424	299
21	12/10/20 Report by OPI	30
22	(Not referenced)	
23R	Compendium of text messages, date at top 3/31/20	43
24	(Not referenced)	
25	9/2/20 Scott-Warren text exchange	187

(All exhibits were retained by Mr. Celli.)

1 MAYOR LOVELY WARREN,

2 called as a witness, having been first  
3 duly sworn/affirmed by Pamela Grimaldi,  
4 Registered Professional Reporter and  
5 Notary Public of the State of New York,  
6 was examined and testified as follows:

7 DIRECT EXAMINATION

8 BY MR. CELLI:

9 Q Good morning, Mayor Warren. We met  
10 briefly off the record. But just to make it  
11 official, I'm Andrew Celli, and as I think you know,  
12 I and my colleagues from the Emery Celli firm in New  
13 York are the independent investigators appointed by  
14 the city council to review the Prude matter. You're  
15 aware of that, right?

16 A Yes.

17 Q And you're here today with Ms. Cohen  
18 who represents the City of Rochester, correct?

19 A Correct.

20 Q I know you're an attorney, so I can  
21 probably dispense with some of the formalities here,  
22 but have you sat for a deposition before?

23 A No.

24 Q Okay. In your practice, did you have  
25 opportunities to -- was that the kind of practice

1 where you took depositions, or not so much?

2 A No. I worked for the State of New  
3 York and I did some real estate stuff on the side,  
4 so I never really did depositions.

5 Q Okay. Well, you're not missing much.  
6 But I will, just so we're clear, go through sort of  
7 the basic protocol.

8 So today I'm going to be asking you a  
9 series of questions, and I would just ask you to  
10 listen carefully to my questions and give as full  
11 and truthful and accurate a response as you can to  
12 each one. Okay?

13 A Yes.

14 Q If at any time you don't understand my  
15 question, please tell me you don't understand it and  
16 I'll do my best to rephrase it or ask a different  
17 question. Okay?

18 A Okay.

19 Q Obviously, if you want to take a break  
20 at any time, if you're feeling fatigued or you have  
21 something else you need to do, you know, and need to  
22 take a little time away from the deposition, just  
23 let me know and we'll stop and accommodate that,  
24 okay?

25 A Okay.

1           Q       If I ask you a question and you give  
2           an answer, I'm going to assume that you understood  
3           my question and gave the best answer you can, okay?

4           A       Okay.

5           Q       Is there any reason, Mayor, that you  
6           think you can't give truthful and accurate testimony  
7           today?

8           A       No.

9           Q       Okay. Great. So let's start right  
10          in.

11                    You understand that we're here today  
12          to take your testimony with respect to issues around  
13          the mental health arrest and death of Daniel Prude,  
14          right?

15          A       Yes.

16          Q       And as you sit here today, you know  
17          that Mr. Prude had a police -- an encounter with the  
18          Rochester Police Department on March 23, 2020,  
19          right?

20          A       Yes.

21          Q       Just to locate that in time for you,  
22          when was the first time that you understood that  
23          there was a police encounter between someone who you  
24          now know to be Daniel Prude?

25          A       On the morning of I would believe

1 March 23. So the day I think that he was -- that  
2 this happened in the middle of the night or early  
3 morning hours, so it would be that day.

4 Q Okay. And how did you come to learn  
5 of this encounter?

6 A The police chief gave me a call.

7 Q Okay. And I'm going to from time to  
8 time today show you some documents. I might as well  
9 do this now. I'm going to do this by sharing my  
10 screen, but I think you also have a copy of some of  
11 the documents. Let me see if I can get this to  
12 open.

13 How were you informed about the police  
14 encounter with Mr. Prude? Was it by a phone call, a  
15 text message, an email, or some other means,  
16 initially?

17 A It was a phone call.

18 Q Okay. And did you -- actually, I'm  
19 going to save this and do this a little bit later  
20 and just stop the screen share.

21 What did Chief Singletary tell you on  
22 the phone call where you first learned about this  
23 encounter?

24 A He stated that we had a gentleman that  
25 was -- brother that was visiting from Chicago whose



1 brother had called stating that he was on PCP,  
2 having some mental health challenges and was in  
3 distress, and that his understanding was that he was  
4 taken into -- while taking him into custody, he had,  
5 you know, lost consciousness. They had taken him to  
6 the hospital. However, because he was, you know,  
7 high off of PCP, he lost consciousness and was  
8 probably not going to make it, and that he would let  
9 me know what -- you know, what came of it, of this  
10 situation.

11 Q And did you have anything to say in  
12 this conversation? Did you ask any questions or was  
13 there any back and forth?

14 A So in this conversation -- and I want  
15 it to be clear, in this discussion I ran two  
16 discussions together. Over time I've had time to go  
17 back and do some research on some things. And so  
18 originally it was a call -- I looked at my cell  
19 phone records so that I can make sure that I give  
20 truthful and accurate answers as I know it, and so I  
21 looked at my cell phone records. And the first  
22 call, he basically just let me know about the  
23 incident and what he believed to be the case, that  
24 this gentleman was on PCP.

25 And then later on that day, because we

1 were in the middle of coronavirus, a number of  
2 different meetings, routine meetings that usually  
3 happen in person, those meetings were turned to  
4 conference calls. So when I went back to look at my  
5 phone records, I saw that those meetings had been  
6 turned into conference calls, so we had another  
7 discussion about our routine meeting. And we had  
8 another discussion about this where this was after  
9 he had seen the video, where he again stated that  
10 this gentleman was high off PCP, that he was  
11 taken -- while taking him into custody, he had lost  
12 consciousness, but that our officers had done  
13 nothing wrong, and everything was -- he reviewed the  
14 video, our officers had done nothing wrong, and most  
15 likely that he would pass away because of his  
16 overdose.

17 Q Got it. Okay. That's extremely  
18 helpful.

19 Let's focus first on the initial call  
20 that you had with Chief Singletary. And I want to  
21 try to break these into smaller parts, if we can.

22 Did -- in the initial call with Chief  
23 Singletary, he told you that that Mr. Prude had been  
24 taken into police custody as opposed to having just  
25 been provided with medical assistance; is that

1 right?

2 A Correct.

3 Q Okay. In that first call, did the  
4 chief indicate to you anything about Mr. Prude  
5 having engaged in any criminal activity?

6 A No, he did not.

7 Q Okay. In this first call, did he tell  
8 you that Mr. Prude had -- was naked or nearly naked  
9 on the street that night?

10 A Not that I recall.

11 Q Okay. Did he tell you about any  
12 statements in that first call, Chief Singletary tell  
13 you about any statements that Mr. Prude made at the  
14 time he was taken into custody?

15 A Not that I recall.

16 Q Okay. I think you said that he told  
17 you in the first call that Mr. Prude was in  
18 distress; is that right?

19 A He didn't say "distress." What he  
20 said was that he was high off of PCP and mental  
21 health -- in a state of mental health challenges,  
22 so -- but he did not say "distress."

23 Q Okay. Did you have an understanding  
24 of -- well, strike that.

25 What was your understanding of what

1 the chief was communicating when he said that  
2 Mr. Prude was in the midst of mental health  
3 challenges when he was taken into custody?

4 A That he was having a mental health  
5 break, as well as suffering from whatever drug that  
6 he was on.

7 Q Got it.

8 So in your mind, anyways, you  
9 understood those to be two different things, that  
10 Mr. Prude was on PCP and also had a mental health  
11 challenge as two distinct conditions; is that fair?

12 A No. No. To me I thought that the  
13 mental health challenge was due to the PCP.

14 Q Okay. In that first call, did Chief  
15 Singletary tell you how many officers -- or  
16 characterize the number of officers who were  
17 involved in taking Mr. Prude into custody?

18 A No.

19 Q Did he tell you it was one or more  
20 than one or several, even if he didn't give a  
21 number?

22 A No. He said that he had not seen the  
23 video, and that he was going to go and look at and  
24 research things, and if there was a problem, he  
25 would let me know.

1 Q Got it.

2 Did he tell you anything in that first  
3 call about the conduct of the police?

4 A No.

5 Q In other words -- okay. Did he say  
6 anything one way or the other about whether the  
7 police had placed their hands on Mr. Prude?

8 A Not that I recall.

9 Q Okay. Did he say anything about  
10 Mr. Prude having been placed in handcuffs?

11 A Not that I recall.

12 Q Am I correct, though, that he did  
13 indicate that Mr. Prude was taken into police  
14 custody; is that fair?

15 A While taking him into custody. So --  
16 while taking him into custody. So, you know, that  
17 could have meant anything.

18 Q Well, what did you understand that  
19 phrase to mean when you heard it from the chief that  
20 morning?

21 A That they -- that the police were  
22 taking him to the -- to get help mentally, and it  
23 was a mental health arrest, and so they were going  
24 to take him to the hospital to get help.

25 Q All right. In that first call, did

1 Chief Singletary say anything about there having  
2 been a spit sock put over Mr. Prude's head?

3 A No, not that I recall.

4 Q Okay. Had you ever heard that term  
5 before this case, spit sock?

6 A I don't think so.

7 Q Okay. And in that first call, did  
8 Chief Singletary tell you that officers of the RPD  
9 had applied force in -- to Mr. Prude at the time  
10 that he was taken into custody?

11 A No.

12 Q Did he say anything about officers  
13 having engaged in stabilization techniques?

14 A No, not that I recall.

15 Q In that first call -- we're just  
16 limiting it to that for the moment -- did the chief  
17 say anything about officers or an officer having  
18 applied a segmenting technique to Mr. Prude?

19 A No.

20 Q Okay.

21 A I'm sorry, that's my dog.

22 (A discussion was held off the  
23 record.)

24 BY MR. CELLI:

25 Q In that first call, did Chief

1 Singletary communicate to you that in the process of  
2 taking Mr. Prude into custody, that he was in a  
3 seated position and tried to stand, and that he was  
4 restrained?

5 A No.

6 Q Okay.

7 A The first call was very short.

8 Q Okay. Is there anything about that  
9 first call that you recall that we haven't talked  
10 about?

11 A No.

12 Q Tell me again what the chief said to  
13 you in the first call about what his follow-up steps  
14 were going to be.

15 A He said that he was going to go and  
16 view the video, and if something was wrong, he would  
17 let me know.

18 Q Got it.

19 And you understood that the chief  
20 would have access to body-worn camera video, right?

21 A Yes.

22 Q And, in fact, the wearing of body-worn  
23 camera video machines was one of the initiatives  
24 that you put into place as the mayor, correct?

25 A Yes.

1 Q In that first call, did you ask him to  
2 share with you any body-worn camera video?

3 A No, I did not.

4 Q Okay. In that first call, did Chief  
5 Singletary communicate to you that there would  
6 likely be a criminal investigation of this incident?

7 A No.

8 Q Okay. Did he mention to you that  
9 there might be a Professional Standards Section  
10 review of this incident? In that first call.

11 MS. COHEN: Did the reporter get the  
12 answer?

13 THE COURT REPORTER: No. I was  
14 waiting on her answer. Did she answer at  
15 the same time as the question?

16 MS. COHEN: Yeah. I think she said  
17 no.

18 Q So you said at the top, which I really  
19 appreciated, that you went and did some research and  
20 determined as you sit here that you think there were  
21 two phone calls with the chief on March 23 on this  
22 topic, right?

23 A Right.

24 Q And the research that you did was to  
25 look at your cell phone records?



1           A        Yes. I had early on went back to look  
2       at my cell phone records to see if there were more  
3       than one phone call, because I had -- you know,  
4       through this process a number of things had, you  
5       know, been revealed that I did not recall. And I  
6       did not see the number that I had associated with  
7       the chief twice on my cell phone records.

8                        However, after going back again and  
9       looking at my calendar and looking at my cell phone,  
10      I realized that we had converted a lot of routine  
11      meetings with senior management into a conference  
12      call, and so then I looked at the records, and the  
13      conference call line was where the second call took  
14      place.

15           Q        Got it.

16                        And do you recall what the topic of  
17      the conference call was before you got to the issue  
18      of Mr. Prude?

19           A        It was our regular scheduled meeting.

20           Q        And who were the participants in that  
21      conference call?

22           A        Generally it -- sometimes other people  
23      join us, but in this it was just the chief and I.

24           Q        I see. So in other words, just so I  
25      get this straight -- strike that.

1                   At what time of day was the conference  
2 call?

3                   A       It was in the afternoon, probably  
4 around 1:30.

5                   Q       Okay.

6                   A       Somewhere around then.

7                   Q       And so am I getting this right that  
8 there was sort of a regularly scheduled call between  
9 yourself and the chief that happened around 1:30 in  
10 the afternoon on March 23, and as part of that call,  
11 there was a report given to you on the Prude matter?

12                  A       Yes. An update.

13                  Q       Update. Right.

14                           Was anybody else on that conference  
15 call at any point in time?

16                  A       Not that I recall.

17                  Q       Okay. So tell me what you recall --  
18 just, again, I'm trying to separate these things  
19 out. What did the chief say to you and what did you  
20 say to him -- strike that.

21                           Do you recall any topics other than  
22 the Prude matter that you talked about in the  
23 conference call at 1:30 on the 23rd?

24                  A       Yes.

25                  Q       What were those?

1           A           There was another incident that  
2 happened that night with someone else, I can't  
3 remember whether the person had been actually  
4 murdered or was shot, but there was another incident  
5 in -- I believe it was on West Main Street, he  
6 updated me on that. He updated me on what was  
7 happening in the community around crime. This was  
8 our regularly scheduled meeting, so it was, you  
9 know, with my senior management team and  
10 different -- at least once a month outside of our  
11 regularly scheduled S&T meetings, I routinely have  
12 meetings with our senior management team. And so we  
13 talked about what was happening in the police  
14 department, about our COVID response and how that  
15 was affecting police officers, making sure that they  
16 had the proper PPE, and this was one of those  
17 updates in that regular scheduled meeting.

18           Q           Got it.

19                       And am I correct that the Prude matter  
20 had come up after you had gone through and talked  
21 about all those other matters, or was it somewhere  
22 in the middle or at the beginning?

23           A           I do not recall exactly where it came  
24 in the conversation.

25           Q           Okay. How long was the conversation,

1 including all these topics, with Chief Singletary?

2 A According to my cell phone records, it  
3 was about 20 minutes, 23 minutes.

4 Q Okay. And how long was the call with  
5 the chief on the morning of the 23rd?

6 A I believe it was about five, five  
7 minutes.

8 Q Okay. And what did the chief say to  
9 you and what did you say to him in the afternoon  
10 call on the 23rd about the Prude matter?

11 A He said that he had reviewed the  
12 video, and that the officers had acted in accordance  
13 with policy, and that this gentleman was in the  
14 hospital and most likely would die from his PCP  
15 overdose. And that the process would be, because it  
16 was an in-custody death, that the PSS would start an  
17 investigation, that the DA's office would do a  
18 review. And I believe that he mentioned -- he might  
19 have mentioned the AG's office, because at that  
20 time, any in-custody death had to also go to the  
21 AG's office to review. But that he was not  
22 concerned about anything because, based on his  
23 review of everything, this was -- the officers acted  
24 in accordance with our policies and procedures.

25 Q Okay. And what did you say to the

1 chief in this call about the Prude issue?

2 A I asked did we do everything by the  
3 book, and he said yes.

4 Q And when you say you asked, Did we do  
5 everything by the book, who's the "we" that you're  
6 referring to there?

7 A Our officers, whoever was taking  
8 Mr. Prude into custody.

9 Q Got it. And he said yes to that?

10 A Yes.

11 Q And you understood when the chief said  
12 he reviewed the video, he was talking about  
13 body-worn camera video, correct?

14 A Yes.

15 Q So I'm going to kind of go through the  
16 same questions that I asked about the first call,  
17 because I want to make sure we have a really clear  
18 record. And perhaps this will stimulate your  
19 recollection also.

20 Did Chief Singletary say to you in the  
21 second call that -- well, was -- that Mr. Prude had  
22 been taken into police custody as distinct from  
23 simply having been provided medical attention?

24 A He said while taking him into custody  
25 he had lost consciousness.

1 Q Okay. And did he tell you anything  
2 about whether Mr. Prude had engaged in any criminal  
3 conduct prior to the encounter with the police?

4 A No.

5 Q Okay. Did he communicate to you that  
6 Mr. Prude had -- was naked on the street that night  
7 even though it was a cold winter night?

8 A No.

9 Q Did he tell you that -- anything about  
10 statements that Mr. Prude made in the presence of  
11 police officers that night?

12 A No.

13 Q In the second call, did he communicate  
14 to you that Mr. Prude appeared to be in distress  
15 when he was with police officers?

16 A No.

17 Q Okay. Did Chief Singletary tell you  
18 how many officers were involved in the encounter  
19 with Mr. Prude in the second --

20 A No.

21 Q -- call?

22 A I'm sorry.

23 Q Did I cut you off?

24 A No. I think I -- I thought you were  
25 done with the question, but you weren't. So I'm

1       sorry for interrupting.

2               Q       No, no. Not at all. This is awkward  
3       in a normal circumstance, and a little more awkward  
4       on Zoom.

5                       Did you -- was it clear to you when  
6       you spoke to Chief Singletary the second time that  
7       there were more than one RPD officers involved in  
8       the encounter with Mr. Prude?

9               A       No. In the second call, it was -- he  
10       gave no reason to think that this was any different  
11       than any routine call to our police department.

12              Q       And based on that, you understood that  
13       there were more than one officers who were involved  
14       in the encounter with Mr. Prude, or something else?

15              A       I did not know how many officers were  
16       involved.

17              Q       Okay. But I think you testified  
18       earlier that the chief told you that the officers,  
19       in plural, acted in accordance with policy, right?

20              A       Correct.

21              Q       And so from that, did you conclude  
22       that there was at least more than one officer that  
23       was involved in this encounter?

24              A       One or two.

25              Q       Okay. In the second call, did Chief

1 Singletary communicate to you that officers had laid  
2 their hands on Mr. Prude?

3 A Not that I recall.

4 Q Did he say anything about the fact  
5 that Mr. Prude had been placed in handcuffs?

6 A No.

7 Q In the second call, did Chief  
8 Singletary mention that a spit sock had been placed  
9 over Mr. Prude's head?

10 A Not that I recall.

11 Q He might have said something like  
12 that, but as you sit here today you're just not  
13 sure?

14 A No, I don't believe he mentioned or  
15 described the video at all.

16 Q Uh-huh. Well, did he -- that's a  
17 great way to put it. Let me ask the question that  
18 way, then.

19 Did the chief mention or describe any  
20 physical contact of any sort between RPD officers  
21 and Mr. Prude in this second phone call?

22 A No.

23 Q Did the chief use the term  
24 "stabilization" to describe officers' conduct with  
25 respect to Mr. Prude?



1           A       Not that I recall.

2           Q       What about the term "segmenting," did  
3 he say anything about officers or an officer  
4 segmenting Mr. Prude in describing their contact  
5 with Mr. Prude?

6           A       Not that I recall.

7           Q       Did the chief say to you that  
8 Mr. Prude had tried to stand and had been  
9 restrained?

10          A       No, not that I recall. There was no  
11 description of the video.

12          Q       Okay. Would it be fair to say, Mayor  
13 Warren, that by the end of the second call you  
14 understood that there had been some physical contact  
15 between RPD officers or an officer and Mr. Prude,  
16 but that it wasn't described to you?

17          A       I don't understand the question.

18          Q       Okay. So I'm now asking you to think  
19 back on your conversation -- the two conversations  
20 that you had that day with Chief Singletary, and as  
21 best you can, whether you can tell me that at the  
22 conclusion of those two calls you had an  
23 understanding that there was some physical contact  
24 between RPD officers and Mr. Prude, but it was not  
25 described in detail to you?

1           A       No. I -- at the end of the calls, I  
2 did not believe that our officers had had any  
3 outside-of-the-normal physical contact when taking  
4 someone into custody, so I had no reason to believe  
5 that this arrest was anything but routine.

6           Q       Uh-huh. What was your understanding  
7 as of that point in time as to what the normal  
8 physical contact would be between an arrestee and a  
9 member of the RPD?

10          A       That you would pat the person down,  
11 put them in handcuffs, and put them in the car or  
12 you would put them on a stretcher. Sometimes you  
13 would have to put them in handcuffs to put them on a  
14 stretcher to take them to the hospital.

15          Q       Okay. So that's a helpful  
16 clarification.

17                   So is it fair to say that at the end  
18 of the second call you understood -- your  
19 understanding was that the only contact between RPD  
20 officers and Mr. Prude was the normal contact that  
21 you would expect in the course of an arrest, as you  
22 described it?

23          A       Yes.

24          Q       Okay. What was your understanding  
25 after these two calls that day about why there would

1 be a Professional Standards Section review of this  
2 arrest?

3 A Because there was -- because it would  
4 be classified -- if Mr. Prude passed away, it would  
5 be classified as an in-custody death.

6 Q And same question about why -- what  
7 was your understanding about why there would be an  
8 investigation by the Monroe County District  
9 Attorney's office?

10 A Because it would be classified as an  
11 in-custody death if he passed away.

12 Q And what was your understanding of  
13 why, at this point in time, there would be an  
14 investigation by the Attorney General's office?

15 A Because it was classified as an  
16 in-custody death.

17 Q Okay.

18 Did Chief Singletary in this call, the  
19 second call, mention that there would be an  
20 investigation by the Major Crimes Unit?

21 A I don't recall.

22 Q Okay.

23 A This PSS -- I may assume that PSS is  
24 Major Crimes, but I think that what I recall is PSS.

25 Q Got it.

1                   And why did you ask the chief whether  
2 we did everything by the book?

3                   A        Because in other instances that I have  
4 been involved in with body-worn camera video, the  
5 officers, in my mind, did not act in accordance with  
6 their [indiscernible due to Zoom doorbell] and I  
7 wanted to know if we did everything by the book.

8                   (Ms. Rosenfeld joined the deposition.)

9                   Q        And the chief assured --

10                  A        I'm sorry. When I say "by the book,"  
11 I mean by our policies and procedures.

12                  Q        Right. That was my next question.

13                           And the chief assured you in this  
14 second call that the officers had behaved in a way  
15 that was consistent with policies and procedures; is  
16 that fair?

17                  A        Correct.

18                  Q        Did he say the same thing at the  
19 conclusion of the call that you had that morning?

20                  A        He did not know at that point. He  
21 said he was going to review everything, and if there  
22 was something that was wrong, he would let me know.

23                  Q        Uh-huh. Okay.

24                           At any point on March 23, were there  
25 any other conversations that you had with Chief

1 Singletary on the 23rd about the Prude matter?

2 A No.

3 Q Okay. So in either of these two  
4 conversations, did Chief Singletary communicate to  
5 you that there was no kicking or punching of  
6 Mr. Prude by RPD officers?

7 A Not that I recalled.

8 Q You don't remember him saying, Nobody  
9 punched or kicked this guy?

10 A Not that I recall.

11 Q Okay. And I don't mean to be pedantic  
12 about this, but I want to ask, when you say not that  
13 you recall, are you saying it's possible but you  
14 don't remember, or are you saying it definitely  
15 didn't happen?

16 A Not that I -- I don't remember it  
17 happening.

18 Q Okay.

19 A What I remember is -- my understanding  
20 was that this was a routine arrest.

21 Q Right. I'm really focusing on what  
22 the chief said as opposed to -- at this point as  
23 opposed to your understanding, but I appreciate  
24 that.

25 Did the chief in the second call, or

1 really any time on the 23rd, mention that a spit  
2 sock had been applied to Mr. Prude?

3 A Not that I recall.

4 Q Mayor Warren, you gave an interview to  
5 the Office of Public Integrity, right?

6 A Yes.

7 Q I'm going to show you a copy of the  
8 report that they issued last week. I'm just going  
9 to ask a couple questions about it.

10 So what we've previously marked as  
11 Warren Exhibit 21 is the report issued on December  
12 10 from the City of Rochester Office of Public  
13 Integrity, and I'm going to take you to page 17.

14 MS. COHEN: And if you could please  
15 enlarge it on your screen.

16 MR. CELLI: As soon as I get there.

17 MS. COHEN: Thank you.

18 MR. CELLI: I see the page numbers are  
19 a bit different.

20 Here we go.

21 BY MR. CELLI:

22 Q I place in front of you an interview  
23 summary that was published as part of the OPI's  
24 report on this matter. Do you see that?

25 A Yes.

1 Q And do you recall giving an interview  
2 to the Office of Public Integrity?

3 A Yes.

4 Q And that was on November 16, 2020?

5 A Yes.

6 Q I'm not just -- I'm going to focus you  
7 on that's what they say, but I'm really asking for  
8 your recollection.

9 A Yes.

10 Q And how long was the interview that  
11 you gave with OPI?

12 A I believe around a half an hour.

13 Q And who was present?

14 A It was Timothy Weir and one of the  
15 other investigators.

16 Q Okay. They have -- they quote you in  
17 this interview as saying that -- I'm focusing up  
18 here. I don't know if you can see my pointer. It's  
19 in the second full paragraph. The Mayor recalls  
20 that during this phone conversation, Chief  
21 Singletary told her that a gentleman had contacted  
22 911 and indicated that his brother was high on PCP  
23 and having a psychotic break.

24 Do you see that?

25 A Yes.

1           Q       And they put the words "psychotic  
2 break" in quotes. Was that the term that you told  
3 the investigators from OPI was told to you by Chief  
4 Singletary?

5           A       He might not have said "psychotic  
6 break," but I think it was mental health issues.

7           Q       Okay. That's fine.

8                   And is that the term that you used  
9 when you spoke to OPI, "psychotic break"?

10          A       I might have.

11          Q       Okay. Now, in this interview you  
12 mentioned just the one phone call. I take it that  
13 you gave this interview prior to doing the research  
14 on your cell phone records; is that right?

15          A       I researched my cell phone records  
16 twice. So originally, a while ago, I looked to see  
17 if there were any -- I remember I ran -- you know,  
18 my recollection of the discussion was that this  
19 gentleman was high off PCP, that everything was done  
20 by the book, and that there was one phone call.

21                   And after speaking to the chief, you  
22 know, he indicated that there were two calls, two  
23 separate calls, I went back and -- you know, I did  
24 not recall the second call. I just recalled this  
25 one discussion about this. So I looked at my phone



1 records then, and I only saw the one call from the  
2 number that I associated with the chief. So I  
3 assumed that I was right and he was wrong.

4           However, after this meeting and after  
5 Tim Weir had indicated to me that there was a  
6 routine scheduled meeting and did it happen, I went  
7 back and I looked at my calendar and then looked at  
8 my cell phone again, and realized that there was.  
9 And all of our routine scheduled meetings at that  
10 time had been converted to conference calls. And so  
11 I had a number of calls to my -- the City's  
12 conference call line on that day, and I am assuming  
13 that that is when that second call took place,  
14 during that time.

15           Q       Got it. That's helpful. I appreciate  
16 that answer. In the course of it, you say that you  
17 spoke to Chief Singletary and he had told you that  
18 there were two calls, and at that point you only  
19 believed there were one [verbatim]. When was that  
20 conversation?

21           A       That was on September 7, I believe.

22           Q       Okay. We'll come to that. Okay.

23                    By the end of the day on March 23, is  
24 it fair to say that you understood that members of  
25 the RPD would be under criminal investigation by

1 either the Monroe County District Attorney's office  
2 or the Attorney General's office?

3 A No.

4 Q Why not?

5 A Because by the end of that call, I  
6 believe that our officers was acting in accordance  
7 to their policies and procedures and that this would  
8 just be a routine review, as many other incidences  
9 were routine review. So, basically, there had been  
10 a number of different cases that the DA's office  
11 will come in and look at because that is just the  
12 way the policies and procedures are.

13 Q So I guess if I'm understanding right,  
14 you're drawing a distinction between what you had  
15 described as a routine review and a criminal  
16 investigation. Am I getting that right?

17 A Yes.

18 Q Let's just articulate that really  
19 clearly. What was your understanding as of this  
20 point of the difference between a routine review by  
21 the DA's office or the AG's office, or both, and a  
22 criminal investigation?

23 A In a routine review, documents are  
24 provided and they look at everything and they make a  
25 determination on whether there is to be another

1 step.

2 Q And what is your understanding of what  
3 the determination is that the prosecutor's offices  
4 make in a routine review?

5 A Whether this case would go to grand  
6 jury, to be reviewed by a grand jury, or rather the  
7 district attorney or whoever would make a  
8 determination that there is nothing to proceed on.

9 Q And in your mind on the 23rd of March,  
10 what was your understanding of a criminal  
11 investigation as opposed to a routine review?

12 A Criminal investigation would be a more  
13 extensive investigation because they believed  
14 something was done wrong.

15 Q Got it.

16 Would you agree that by the end of the  
17 day on the 23rd, you understood that the -- any  
18 officers involved in the Prude matter would be  
19 subject to an investigation by the Professional  
20 Standards Section?

21 A Can you repeat the question?

22 Q Sure.

23 By the end of the day on March 23,  
24 2020, was it your understanding that officers  
25 involved in the Prude mental health arrest, that

1 their conduct would be reviewed by the Professional  
2 Standards Section of the RPD?

3 A Yes.

4 Q So by the end of the day on the 23rd,  
5 did you consider asking yourself to review the  
6 body-worn camera footage of this incident?

7 A No. Nothing that the chief had said  
8 to me in our discussions had led me to want to or  
9 think that I needed to review the body-worn camera  
10 footage video, because my understanding was this was  
11 a gentleman that was overdose -- that had overdosed  
12 on PCP and was taken to the hospital.

13 Q Uh-huh. Would you agree that as of  
14 the end of the day on the 23rd, it was your  
15 understanding that nothing that RPD officers had  
16 done had contributed to Mr. Prude having become  
17 unconscious and having a medical issue?

18 A Correct.

19 Q Okay. And in the time since the 23rd,  
20 you've been critical of Chief Singletary in a number  
21 of statements that we'll talk about later today.  
22 Knowing what you know now, what would you have  
23 expected the chief to tell you that he didn't tell  
24 you on the 23rd, if anything?

25 A That I needed to come in and

1 immediately review the video.

2 Q And why would you have expected or --  
3 him to have asked you to review the video at that  
4 point?

5 A Because the video -- based on my  
6 response to other incidences with our police  
7 department, this video aligns with something that I  
8 would be very critical of.

9 Q And what responses to other incidences  
10 are you referring to?

11 A The Christopher Pate video and the way  
12 our officers responded. We had another situation in  
13 I believe it was June or sometime with a gentleman,  
14 another mental health or drug issue and, you know,  
15 our officers had acted, you know, with a bystander a  
16 little bit out of line. And so when I review the  
17 body-worn camera video, I have a critical eye and I  
18 see things that people that are outside of -- things  
19 that I believe that people that are in law  
20 enforcement may look at as routine as not okay.

21 Q Okay. Well, the June incident --  
22 you're talking about the incident in June 2020 that  
23 occurred on Bay Street?

24 A Yes.

25 Q Okay. So as of the 23rd of March,

1 obviously that hadn't happened yet, right?

2 A Correct.

3 Q But the Christopher Pate incident,  
4 what was it about that incident that causes you to  
5 think that you would have expected Chief Singletary  
6 to show you the body-worn camera footage in the  
7 Prude case right away?

8 A The behavior of the officers.

9 Q What do you mean by that?

10 A The -- in the Christopher Pate video,  
11 the antagonizing, the things and the words that were  
12 said and the actions of the police officers was very  
13 disturbing, and I had indicated such in the past,  
14 and would have expected that reviewing this video  
15 would have raised the same, in my mind, for him on  
16 how I would react to it, not how he would, but how I  
17 would react to it that there was an issue here.

18 Q Right. And you had raised your  
19 concerns about the Christopher Pate video with Chief  
20 Singletary, right?

21 A No. At the time he was not the chief.  
22 It was Chief Simonelli, but he was one of -- he was  
23 in command.

24 Q Uh-huh. Well, it's an important point  
25 that I get the titles right.

1                   What had you spoken to -- strike that.  
2                   Had you ever told La'Ron Singletary,  
3 whatever his title may have been at a particular  
4 point in time, about your reaction to the Pate  
5 video?

6                   A        Yes.

7                   Q        And had you told him that prior to  
8 March 23, 2020?

9                   A        Yes.

10                  Q        And what basically had you  
11 communicated to him about the Pate video?

12                  A        The entire command staff knew that I  
13 did not find Christopher Pate's video to be routine  
14 behavior; that the antagonizing of a resident,  
15 putting, you know, charges on a resident, that  
16 officers standing by and allowing a resident to be  
17 beaten knowing that this resident is not who they  
18 are looking for, how the situation was handled at  
19 the hospital, was not becoming of our department and  
20 not aligned with our policies and procedures.

21                  Q        Okay. By the end of the day on the  
22 23rd had you given any consideration to there being  
23 a notification to the public about the fact that  
24 there had been a mental health arrest, that a person  
25 had gone unconscious during that mental health

1 arrest, and that it was possible and even likely  
2 that the person would pass away?

3 A No, because this was a routine  
4 situation, and I believed that there was nothing out  
5 of the norm.

6 Q Okay. And same question by the end of  
7 the day on the 23rd, did you give any consideration  
8 to notifying anybody at city council about the Prude  
9 incident?

10 A No.

11 Q Other than Chief Singletary -- and why  
12 not?

13 A Because I believe that this was a  
14 routine situation, that there was nothing out of the  
15 norm, and that there was nothing that I needed to do  
16 in this particular situation because this was a  
17 normal set of circumstances.

18 Q Okay. Well, had you had situations in  
19 the past during your mayoralty where there were  
20 in-custody -- there was an in-custody death of  
21 somebody? When I say "in custody," I mean in the  
22 custody of the RPD.

23 A There was one other incident a number  
24 of years ago, I cannot remember the gentleman's  
25 name, while we were taking him into custody there



1 was a taser incident. He was -- the gentleman was,  
2 I believe, on drugs as well. He had driven a car  
3 into some buildings. When he got out of the van,  
4 one of our officers had tased him and he had died.  
5 And, you know, that was -- I think some of it was on  
6 video, but the circumstances were so out of the norm  
7 that, you know, that situation, for me was something  
8 that was not necessarily routine because we had  
9 property damage, the car, a number of different  
10 things.

11 Q That was Mr. Gregory; is that correct?

12 A I don't recall his name. I'll assume  
13 that that --

14 Q No, no need to assume. I'm just  
15 trying to stimulate your recollection. If you don't  
16 recall, that's fine.

17 Well, you would agree, though, that an  
18 in-custody death of any kind is not something that  
19 happens with frequency in Rochester, right?

20 A Correct.

21 Q Okay. And the other time that there  
22 was an in-custody death was where officers had  
23 applied a taser to somebody and that person died,  
24 right?

25 A Yes.

1           Q       And when -- on the 23rd did it -- is  
2 this something you thought about, like this  
3 situation is different from the in taser -- the  
4 taser in-custody death that had occurred previously,  
5 or did that not cross your mind?

6           A       It did not cross my mind because I  
7 believed that this was a PCP overdose, and we've had  
8 overdoses happen routinely in our community.

9           Q       Okay. So let's -- I'm going to switch  
10 back to screen sharing, and I'm going to...

11                   Well, let me ask a general question.  
12 What is the next thing you heard about the Prude  
13 matter?

14           A       It was a week later where I received a  
15 text from the chief that said, The gentleman that I  
16 briefed you on on Monday that was here from Chicago  
17 on PCP, he passed away and the ME will determine  
18 cause of death.

19           Q       Right.

20                   Going back for one minute, other than  
21 Chief Singletary, did you speak to anybody about the  
22 Prude matter from the 23rd to the 31st of March?

23           A       No.

24           Q       So I'm putting before you what we've  
25 marked for purposes of this deposition as Warren

1 Exhibit 23R. And my understanding of this is it's a  
2 compendium of text messages that came from your cell  
3 phone, Mayor Warren. I want to direct your  
4 attention to the very first entry.

5 Can you see that okay?

6 A Yes.

7 Q I can make it bigger.

8 And this is an entry from March 31,  
9 2020 at 8:20 in the morning, and it reads or begins,  
10 Morning Mayor. The individual I gave you a briefing  
11 about last Monday (gentleman likely high on PCP from  
12 Chicago), doctors pronounced him last night. The  
13 cause of death will be determined by the ME's office  
14 at some point.

15 Do you see that?

16 A Yes.

17 Q And that's the text message that  
18 you're referring to from Chief Singletary?

19 A Yes.

20 Q And you understood at this point that,  
21 in fact, Mr. Prude had died, right?

22 A Yes.

23 Q And that this was, in fact, going to  
24 be treated as an in-custody death as the chief had  
25 predicted, right?

1 A Yes.

2 Q And would you agree that as of this  
3 point -- strike that.

4 Had anything changed about your  
5 perception of what had occurred in the Prude  
6 incident between the 23rd and the 31st?

7 A No.

8 Q Did you give any consideration when  
9 you learned from the chief that Mr. Prude had  
10 actually died to notifying the public that this had  
11 occurred?

12 A No.

13 Q Why not?

14 A Because I believed this was a drug  
15 overdose.

16 Q And same question with respect to  
17 notifying the council. Did you give any  
18 consideration of notifying the council when you  
19 learned that Mr. Prude had actually died?

20 A No.

21 Q And why not?

22 A Because I believed that this was a  
23 drug overdose, and that this was -- there was  
24 nothing out of the norm.

25 Q The next message refers to the ME's

1 office. You understood that to be the medical  
2 examiner's office, right?

3 A Yes.

4 Q And have you in your time as mayor had  
5 the opportunity to review findings or hear about  
6 findings from the medical examiner's office on prior  
7 occasions?

8 A Not that I remember.

9 Q Did you understand when you received  
10 this message that the medical examiner's office was  
11 going to determine the cause and manner of  
12 Mr. Prude's death?

13 A Yes.

14 Q And did you consider the -- when you  
15 saw this message, did you understand that what the  
16 medical examiner would have to say about the cause  
17 and manner of Mr. Prude's death, that would be  
18 something that would be significant to you as mayor?

19 A Yes.

20 Q Okay. And did you do anything to  
21 follow up on Chief Singletary's note here that says  
22 that the medical examiner is going to determine the  
23 cause of death?

24 A No.

25 Q Why not?

1           A           Because there was nothing from the  
2           discussion that I had with the chief that gave me a  
3           reason to question whether that this was different  
4           than a routine overdose and that the medical  
5           examiner would determine that it was such.

6           Q           Okay.

7           A           Was the reason why he passed away.

8           Q           At some point you learned that the  
9           medical examiner determined that Mr. Prude died by  
10          homicide, right?

11          A           Yes.

12          Q           And when you learned that, whenever  
13          that was, we'll talk about that, you understood that  
14          that meant that his death had been caused by another  
15          person, at least in part; is that fair?

16          A           Yes.

17          Q           Okay. Were you surprised to learn  
18          that the medical examiner determined that  
19          Mr. Prude's death was caused by homicide?

20          A           At the time that I recall learning  
21          about the medical examiner's, I had seen the video,  
22          and so I was not surprised.

23          Q           Okay. But as you sit here today,  
24          would you agree that when you believed that  
25          Mr. Prude's death had been caused by an overdose,

1 that is not a cause that would have resulted in a  
2 finding of homicide, right? To your knowledge.

3 A Can you repeat the question? Sorry.

4 Q Probably not. But maybe Pam can help.

5 (Whereupon, a portion of the record  
6 was read by the reporter.)

7 A Correct.

8 Q Okay. When you received this text  
9 message from the chief -- let me ask, do you recall  
10 receiving this message on March 31?

11 A Yes.

12 Q Okay. And did you speak with the  
13 chief about this message at any point in time after  
14 that?

15 A No. Well --

16 Q Did you want to --

17 MS. COHEN: You mean about this  
18 matter?

19 MR. CELLI: No. About this message.

20 Q I'm sorry. That was not a great  
21 question.

22 Let me ask it another way.

23 In the message -- well, did you speak  
24 with Chief Singletary about the fact that he had  
25 sent you a message on March 31 at any point in time

1 after this?

2 A Yes. The chief and I had a discussion  
3 on, I believe, September 7 about what he recalled  
4 and what I recalled.

5 Q Okay. We'll come to that.

6 Other than that, had you -- there were  
7 no other conversations between you and the chief  
8 about the fact that he sent you a message on March  
9 31; is that correct?

10 A No.

11 Q Okay.

12 A Well, actually, when we had a  
13 discussion after I saw the video.

14 Q And when was that?

15 A On August 4.

16 Q Okay. Did -- during his time as  
17 police chief, did Chief Singletary have a practice  
18 of reporting to you significant events at the RPD?

19 A Yes.

20 Q And what was his practice with regard  
21 to that?

22 A Several. Sometimes it was by phone  
23 followed by an email of update on significant  
24 issues, and sometimes it was by text message.

25 Q Okay. Did you ever express a view or



1 a preference to the chief about how you wanted to be  
2 informed of significant events at the RPD?

3 A Tell me any way that -- tell me any  
4 way that you -- but make sure that I know.

5 Q Okay. So would it be fair to say that  
6 you didn't tell him in particular, I like to get it  
7 by text, or I like to get it by email, or, Just call  
8 me on the phone or write me a memo or come to my  
9 office? You didn't specify a means by which  
10 significant events would be disclosed to you; is  
11 that fair?

12 A Correct.

13 Q Okay. And were there times when the  
14 chief would disclose significant events to you  
15 orally without a text message, phone call, or email?

16 A No. Generally I would get an oral  
17 notification and get a follow-up email about what we  
18 discussed.

19 Q Uh-huh. And sometimes there would be  
20 a text message also?

21 A If he notified me by text message,  
22 there would also be a follow-up email. So, for  
23 example, if there was a murder or something, I  
24 routinely like to call the victim's family and just  
25 check in and ask them how they are doing and offer

1       our condolences on behalf of the City. So he may  
2       notify me by text message or by a phone call. But  
3       the day or two after I would get a report from him  
4       or something that was forwarded from him to me with  
5       the family's information and any updates on that  
6       situation.

7               Q       Was there anything specific about the  
8       way you expected Chief Singletary to report to you  
9       about significant uses of force by members of the  
10      RPD as opposed to a homicide that happened, a  
11      shooting? You know, a traffic accident or some  
12      other kind of significant issue.

13             A       I would expect to get a phone call and  
14      a follow-up email about the incident or a follow-up  
15      discussion with him in one of our routine meetings  
16      about what happened and what his response would be.

17             Q       Were there any circumstances prior to  
18      late March of 2020 where you became aware of a  
19      significant event at the RPD that Chief Singletary  
20      had not reported to you?

21             A       No.

22             Q       Were there ever any problems or issues  
23      with Chief Singletary making timely reports to you  
24      of significant events at the department?

25             A       Not that I know of.

1           Q       Did anybody else other than Chief  
2       Singletary have any responsibility for making  
3       reports to you of matters of significance that  
4       occurred involving the RPD?

5           A       When the chief was on vacation or at  
6       training and somebody else was filling in for him,  
7       then those people would be responsible.

8           Q       That would be somebody from the RPD  
9       command staff; is that right?

10          A       Yes.

11          Q       Okay. Were there ever situations,  
12       Mayor Warren, something significant that related to  
13       the RPD was brought to your attention for the first  
14       time by other members of your administration, people  
15       who were not part of the RPD?

16          A       Yes.

17          Q       What do you recall about that  
18       generally?

19          A       There were times when we would get  
20       notified on Facebook or someone would call our  
21       Office of Constituent Services and we would follow  
22       up on those matters.

23          Q       And those -- what kinds of matters  
24       would be brought to your attention in that way that  
25       related to the Rochester Police Department?

1           A       A constituent making a complaint about  
2       how they were being treated.

3           Q       Right.  And what department or bureau  
4       would those complaints come in through if there was  
5       one?

6           A       The Office of Constituent Services.

7           Q       Is that a part of the communications  
8       bureau or a part of the mayor's office or some other  
9       larger bureau or department?

10          A       Part of the mayor's office.  They sit  
11       outside my door.

12          Q       Got it.

13                   And other than complaints from  
14       constituents that would come in through that  
15       mechanism, did you ever have the experience of  
16       learning about a significant event involving the RPD  
17       from other members of your administration, not  
18       somebody within the RPD itself?

19          A       The deputy mayor.

20          Q       What do you recall about that?

21          A       The -- sometimes a constituent would  
22       send him a Facebook message or he might see  
23       something on Facebook and follow up and let me know  
24       and I would follow up as well.

25          Q       Okay.  Prior to March or April --

1 well, strike that.

2 At any time have you ever had the  
3 experience of becoming aware of a significant event  
4 that you believe should have been reported to you by  
5 the communications bureau that was not timely  
6 reported to you, you learned about it some other  
7 way, but you believe that they should have told you  
8 about it?

9 A No.

10 Q So there were no issues or problems  
11 with reporting coming to you from the communications  
12 bureau; is that fair?

13 A Not that I recall. No.

14 Q Was it the case in the early part of  
15 this year that from time to time matters of  
16 significance to the City would be brought to your  
17 attention by folks over at the communications  
18 bureau?

19 A Yes.

20 Q But there hadn't been any complaints  
21 or problems with timeliness with respect to reports  
22 coming to you from the communications bureau; is  
23 that fair?

24 A Right.

25 Q Okay. I'm going to show you a

1 document that we've previously marked as Warren  
2 Exhibit No. 1. This is an email from Chief  
3 Singletary to you dated May 11, 2020. Do you see  
4 that?

5 A Yes.

6 Q And do you recall receiving this email  
7 message from Chief Singletary?

8 A Yes.

9 Q And when you received this message  
10 from Chief Singletary, what did you understand its  
11 purpose to be?

12 A I had contacted the chief because I  
13 had received a Facebook video and a call in my  
14 office from the family of -- the mom who was very  
15 upset with how our officers acted, and I had wanted  
16 him to follow up and let me know what was the plan.

17 Q Got it.

18 So am I correct that this email from  
19 the chief was actually a response to a request for  
20 information from you or your office?

21 A Yes.

22 Q Okay. You see in this email Chief  
23 Singletary says, In addition -- this is in the  
24 second paragraph, down here, I have PSS doing a  
25 cursory review of all the body-worn camera footage

1 with a focus on additional training needs or  
2 discipline. Upon an initial view of the video,  
3 there does appear to be some training issues needing  
4 to be addressed.

5 Do you see that?

6 A Yes.

7 Q And did you understand from that  
8 communication that the chief believed that the  
9 conduct of the officers in this situation was not  
10 consistent with their training?

11 A Correct.

12 Q And you understood that one of the  
13 things that the chief would be telling you about  
14 would be if there was a deviation from training by  
15 officers, right?

16 A I'm sorry, sir. Can you hold on one  
17 second? My dog is barking. Can I let him out?

18 MR. CELLI: Do you want to take a  
19 break, Mayor? We've been going over an  
20 hour.

21 MS. COHEN: That would be great, Andy.

22 MR. CELLI: Let's take five minutes.  
23 Ten, if you'd like.

24 (Whereupon, a recess was taken  
25 between 10:49 and 11:01 a.m.)

1 BY MR. CELLI:

2 Q Mayor Warren, you mentioned in this  
3 morning's testimony about an incident that happened  
4 in June of 2020 on Bay Street involving the RPD.

5 A Yes.

6 Q And that was a case where the RPD had  
7 contact with somebody who may have been having a  
8 mental health challenge; is that your recollection?

9 A Yes.

10 Q And in that case, Chief Singletary  
11 gave a public statement about what occurred in that  
12 situation, correct?

13 A Yes.

14 Q And how often does Chief Singletary  
15 give public statements about RPD operations?

16 A All the time.

17 Q All the time? Did you think it was  
18 significant that he spoke to the press on the  
19 occasion of the Bay Street issue?

20 A Yes.

21 Q And when that happened -- and I have  
22 an article from The Spectrum that I can show you if  
23 you'd like to see it. But when that happened, did  
24 it trigger for you any thoughts about the fact that  
25 you had been notified of an issue with the mental



1 health arrest back in March?

2 A No.

3 Q So you didn't put together in your  
4 head that here we have an issue in June that  
5 involved the police having contact with somebody who  
6 might have been having a mental health challenge,  
7 and that you had also had a conversation with the  
8 chief about a situation involving a mental health  
9 issue with a person going back to March?

10 A No. Because in my mind the March  
11 incident was an overdose, it wasn't -- the  
12 overdose -- I didn't classify that March incident as  
13 a mental health issue. It was an overdose issue.

14 Q Okay. I'm going to now screen share  
15 with you, Mayor, and go to what we've marked  
16 previously as Warren Exhibit 3. Do you recall  
17 receiving this email from Chief Singletary on July  
18 6, 2020?

19 A Yes.

20 Q And in this email is the chief  
21 reporting to you about the passing of somebody who  
22 had been a shooting victim back in 2017? Right?

23 A Yes.

24 Q And the person actually passed away on  
25 June 30 of '20, so three years later, correct?

1 A Yes.

2 Q And in it he points out that the  
3 medical examiner has ruled the death of this person  
4 to be a homicide, right?

5 A Yes.

6 Q And he says that that will count  
7 towards this year's numbers, right?

8 A Yes.

9 Q What did you understand him to mean by  
10 that?

11 A Routinely in our meetings we report --  
12 he reports to me our homicide numbers, and monthly I  
13 get a report on our homicide numbers. And 2020 was  
14 a year that our homicide numbers had really  
15 significantly gone up. We had had a number of, you  
16 know -- crime was going up, and so we were paying  
17 very close attention to those numbers. And so every  
18 time he would give me a report on what those numbers  
19 are and the -- you know, where they were from. And  
20 so he wanted me to know that we would have an  
21 additional homicide classified for this year,  
22 however, it wasn't a shooting that took place this  
23 year; it was from a previous year, but it would  
24 count towards this year.

25 Q Got it.

1 I'm just going to get up and close my  
2 door because my kid's making noise here.

3 Okay. And did you expect that the  
4 chief would inform you whenever there was a homicide  
5 in Rochester?

6 A Yes. I get notified several ways when  
7 there's a homicide. I get notified by a text from  
8 911, as well as a phone call from 911, and usually  
9 the chief or someone in senior management command  
10 will call me to let me know.

11 Q Okay. Is there a notification  
12 procedure for you to -- when there's been a  
13 determination by the medical examiner that a  
14 homicide has occurred?

15 A Outside of the normal procedures of --

16 Q Yeah. Other than what you've already  
17 talked about.

18 A No. The -- if it's a homicide, then  
19 it is -- I get notified by 911, I get a phone call  
20 from 911 as well as a text, and then I would receive  
21 a call from senior -- you know, someone in the  
22 senior management.

23 Q Okay. And do you -- at any given time  
24 as part of your job as mayor, do you know how many  
25 homicides have occurred in Rochester in the current

1 year?

2 A We're at, I believe, 38.

3 Q And --

4 A I'm sorry. We would be at 39. We  
5 just had another homicide this weekend.

6 Q Sorry to hear that.

7 And is it your practice to sort of  
8 have in your mind and keep track of how many  
9 homicides take place in Rochester?

10 A Yes.

11 Q And that's important for you to know  
12 as mayor, right?

13 A Yes.

14 Q And were there situations where you  
15 might receive a notification of a homicide from the  
16 911 system and then Chief Singletary would notify  
17 you of the homicide also orally?

18 A Yes.

19 Q And in that kind of situation, there  
20 would -- there would not be anything written from  
21 Chief Singletary or the department to notify you of  
22 a homicide that would have come through this other  
23 mechanism, which would be the 911 system; is that  
24 fair?

25 A Yes and no, because what would

1 generally happen is 911 would notify me, I may  
2 receive a phone call, but again, I would usually  
3 receive either an email or a text message with the  
4 family's contact information because I called the  
5 family to extend our condolences.

6 Q Got it.

7 Did you ever receive an email or text  
8 with contact information for the Prude family prior  
9 to August 4, 2020?

10 A No.

11 Q Okay. Do you have an understanding of  
12 why Chief Singletary decided to report this  
13 homicide, the one that he reported on July 6, 2020,  
14 by email as opposed to by some other method?

15 A Because this was a homicide that did  
16 not happen in this year, or a shooting that did not  
17 happen in 2020, it was a previous year, so it  
18 wouldn't be something that would be on our radar for  
19 this year. So because the shooting happened in  
20 2017, but the person passed away in 2020, this would  
21 not be a homicide that we would -- that I would be  
22 tracking in this year's numbers.

23 Q Got it.

24 I'm going to go to another exhibit,  
25 Mayor Warren. This one we've marked as Exhibit 14.

1 I want to sort of explain it to you before we talk  
2 about it.

3 So at the top of this exhibit is an  
4 email chain between Stephanie Prince of the law  
5 department and Patrick Beath of the law department.  
6 And the date of that is September 8, 2020. Okay?  
7 I'm actually going to ask some questions about the  
8 bottom part of the email chain, which is an exchange  
9 between Chief Singletary and Justin Roj that  
10 occurred Friday, April 10 at 6:10 -- between 5:30  
11 and 6:10 p.m. Okay?

12 A Okay.

13 Q So I'm not asking any questions or  
14 interested in your knowledge about this exchange  
15 between Ms. Prince and Mr. Beath. I'm going to  
16 really focus on the exchange between Mr. Roj and the  
17 chief, okay?

18 A Yes.

19 Q So as you sit here today, you are  
20 aware that Chief Singletary wrote an email to Justin  
21 Roj on April 10, 2020 to provide his version of the  
22 medical examiner's ruling on the Prude death, right?

23 A Today I am aware of this email.

24 Q Right. And my question -- and that  
25 report that Chief Singletary gave to Justin Roj,

1 that's this email here on April 10 at 5:34 p.m.,  
2 right?

3 A Yes, that's what it says.

4 Q Okay. Did Mr. Roj say anything to you  
5 in or about this period about the fact that he had  
6 received a report from Chief Singletary about a  
7 mental health arrest that we now know to have  
8 involved Mr. Prude?

9 A No.

10 Q Did he show you this email at any  
11 time?

12 A Prior to me finding out about it in  
13 August?

14 Q Well, let's -- yeah. When's the first  
15 time you saw this email, I guess is maybe a better  
16 way to ask it?

17 A In August after the deputy mayor -- I  
18 believe when the deputy mayor did his report -- or,  
19 no -- or right before the deputy mayor did his  
20 report.

21 Q So if I tell you that the deputy  
22 mayor's managerial report -- is that the one you're  
23 referring to?

24 A Yes.

25 Q If I told you that that came out on

1 September 14, would that assist you in placing in  
2 time when you first saw this exchange between  
3 Mr. Roj and Chief Singletary?

4 A So it was between September 7 and  
5 September 14. I'm sorry.

6 Q It's okay. I just want to make sure  
7 we get it clear.

8 Putting aside the email for the  
9 moment, when is the first time that you had learned  
10 that Mr. Roj had been informed on April 10 that the  
11 medical examiner had ruled the death of Mr. Prude to  
12 be a homicide?

13 A September 7.

14 Q And how did you learn that?

15 A From the chief.

16 Q And was this in the conversation that  
17 you had referred to earlier in your testimony?

18 A Yes.

19 Q And were you surprised when the chief  
20 informed you of that?

21 A Yes.

22 Q And why were you surprised?

23 A Because I had no idea.

24 Q Okay. As you look at this email  
25 exchange between the chief and Mr. Roj now, does it



1 reflect from your point of view a customary or  
2 ordinary interaction between the chief of police and  
3 the head of the communications bureau under your  
4 administration? And by that I mean would it be  
5 normal for the chief to send an email like this to  
6 the head of communications about an issue that might  
7 become public involving the PD?

8 A Yes.

9 Q And how -- what was your understanding  
10 of the degree to which the chief and Justin Roj  
11 would communicate about matters that might become  
12 public involving the RPD at this time?

13 A Generally the communication is between  
14 the police's PIO and our communications person. So  
15 routinely there are -- the police department has  
16 their own public information officer that handled a  
17 lot of their day-to-day communications and contact  
18 with the media, and if there was to be a --  
19 something that the administration should know of  
20 that would be outside of our normal operations, that  
21 then our communications person would be informed so  
22 that they know how to respond. And if it's  
23 something out of the -- you know, something that is  
24 larger, then I would respond.

25 But here there had been no media

1 inquiries and there -- well, the email says that  
2 there's no media inquiries and that, you know, if  
3 somebody -- you know, if there were, that they would  
4 coordinate with Frank, who's on the police -- the  
5 police information side.

6 Q Got it.

7 And was Jackie Shuman the public  
8 information officer at the PD at this point?

9 A Yes.

10 Q Do you -- as you sit here today,  
11 knowing all the things you know about this case, do  
12 you have any understanding of why the chief would  
13 send this directly to Justin Roj and then it would  
14 not go through the folks at Office of Public  
15 Information at the PD?

16 A No, I do not.

17 Q Was it customary for the chief to  
18 communicate himself directly, not through OPI,  
19 but -- or PIO, but through -- just directly to the  
20 communications bureau?

21 A Not really, unless there is a major --  
22 unless -- generally it's the opposite. Generally we  
23 may get a call in our communications area and we  
24 would -- our director of communications would be  
25 calling the chief to get an answer. So it usually

1 is opposite or not this way.

2 Q I understand that. I guess I'm asking  
3 a slightly different question.

4 Where there is a routine matter  
5 involving the RPD, would it be customary for the  
6 chief of police himself personally to communicate  
7 about that with the head of the communications  
8 bureau, Mr. Roj?

9 A Depends on the issue.

10 Q What do you mean by that?

11 A That if it's something that rises to a  
12 level of -- that would become major for our  
13 administration, then it would be a direct  
14 communication.

15 Q Okay. As you sit here today and  
16 review this email, are you surprised that the chief  
17 himself personally reached out to Justin Roj about  
18 the Prude matter in April of 2020?

19 A No.

20 Q Why not?

21 A Because I don't see this -- I see this  
22 matter as something that he would tell the  
23 communications director.

24 Q Okay. I will represent to you, Mayor  
25 Warren, that the 10th of April of this year was the

1 holiday of Good Friday and the end of Holy Week, and  
2 then that Sunday, the 12th, was Easter. Did you  
3 observe those holidays?

4 A Yes.

5 Q Okay. And you understand that Chief  
6 Singletary has asserted that he spoke to you about  
7 the Prude matter on Monday, April 13, which would be  
8 the day after Easter. You know that he says that,  
9 right?

10 A The elevator? The thing about the  
11 elevator?

12 Q Right. So let me ask it as a  
13 question.

14 Is it your understanding that the  
15 chief claims to have spoken to you on April 13 in  
16 the basement of City Hall near the elevator doors,  
17 and that he discussed the Prude matter with you at  
18 that point?

19 A No. I thought that he was asserting  
20 that he had a discussion with me on April 16.

21 Q Okay. Do you recall -- is it your  
22 understanding -- strike that.

23 Did you have a conversation with Chief  
24 Singletary on April 13 or 16 about the Prude matter?

25 A I don't remember that.

1           Q       Okay.  If the chief says that he spoke  
2       to you on the 13th or 16th around -- with regard to  
3       the Prude matter, are you denying that, or you're  
4       saying you just don't recall one way or the other?

5           A       I don't remember ever having that  
6       discussion.

7           Q       Okay.  Well, let me ask directly.  Did  
8       the chief speak to you about the Prude matter for  
9       approximately five minutes at the doors of the  
10      basement elevator in City Hall in April of 2020?

11          A       I don't remember him discussing with  
12      me the Prude matter.  I do remember us talking on  
13      the 16th, because we just had a press conference on  
14      homicides.

15          Q       And was that the press conference  
16      where Wanda Ridgeway was present?

17          A       She was not present.  It was by Zoom.

18          Q       Oh, okay.  So she was there, but in  
19      Zoom form, I guess you'd say.

20          A       Correct.

21          Q       Got it.

22                    What do you recall about the  
23      conversation you had with the chief on the 16th  
24      around the press conference concerning homicides?

25          A       We were just talking about the

1 increase in homicides and the fact that we were in  
2 the middle of a pandemic and, you know, how we were  
3 going to handle, you know, this situation, and  
4 couldn't believe that the numbers were as -- getting  
5 as bad as they were.

6 Q The numbers of the homicides?

7 A Homicides, shooting, violence. All of  
8 that.

9 Q Got it.

10 And in that conversation did the chief  
11 convey to you that the medical examiner had ruled  
12 the death of Mr. Prude to be a homicide?

13 A I don't remember that.

14 Q Okay. You're not saying it definitely  
15 didn't happen, you just don't remember one way or  
16 the other?

17 A I don't remember having that  
18 conversation.

19 Q Uh-huh. Well, do you remember in the  
20 context of the discussion with the chief after the  
21 press conference involving homicides there being any  
22 discussion of the medical examiner?

23 A No, I do not remember that.

24 Q When is the first time you learned  
25 that the cause of Mr. Prude's death had been ruled a

1 homicide?

2 A After I watched the video on August 4  
3 is the first time I recalled it.

4 Q So to be clear, your testimony is you  
5 may have heard it earlier, you don't remember that,  
6 but you do remember hearing it after you saw the  
7 video on August 4?

8 A I don't remember having a conversation  
9 at all regarding the medical examiner in -- April 16  
10 as it relates to the Prude matter. I do remember  
11 discussing it as part of the overall review of the  
12 video camera and how we were going to handle it as  
13 an administration.

14 Q And that was on August 4, right?

15 A Yes.

16 Q All right. But I'm -- so your answer  
17 was a little bit more narrow than my question, so  
18 let me reask the question.

19 Whether you heard about it in -- after  
20 the press conference on April 16 or at any other  
21 time, is it your testimony that you don't recall one  
22 way or the other hearing that the medical examiner  
23 had determined Mr. Prude's death to be a homicide  
24 prior to August 4 of 2012?

25 A Correct.

1           Q       And I ask it that way because I want  
2       to be clear that your testimony is that it's  
3       possible that you did hear it prior to August 4, you  
4       just don't recall it, as opposed to you saying, I  
5       definitely didn't hear it before the 4th.

6           A       Correct.

7           Q       Okay. And you understand that the  
8       term "homicide" does not necessarily mean that  
9       someone has committed a criminal act, right?

10          A       Right.

11          Q       Homicide just means that one person  
12       caused the death of another person and it doesn't  
13       really speak to culpability; is that fair?

14          A       Yes.

15          Q       Okay. But if somebody were the victim  
16       of a homicide and there were no criminal  
17       culpability, that homicide would count towards the  
18       number of homicides in the City of Rochester that  
19       would get recorded by the medical examiner, right?

20          A       No.

21          Q       And why not?

22          A       Because it wouldn't be classified as  
23       a -- the way that the FBI classifies our homicide  
24       numbers, it has to be a true homicide, that someone  
25       died criminally at the hands of another person.



1 Q Okay. So when you --

2 A So self-defense or something like that  
3 would not count, even though it may be a homicide  
4 because it's classified as a death by somebody else,  
5 but it wouldn't be -- count towards our numbers.

6 Q Got it.

7 So when you said earlier that -- I  
8 think you said there were, sadly, 38 homicides this  
9 year in Rochester, that number is limited to  
10 homicides where -- where there is the belief that  
11 criminal conduct occurred to cause the death?

12 A Yes.

13 Q Got it.

14 A That's my understanding.

15 Q And who makes the decision as to --  
16 strike that.

17 Have there been situations during your  
18 time as mayor, Mayor Warren, that a death has been  
19 reported to you that was a homicide in the sense of  
20 a death caused by another person, but no criminal  
21 culpability was found to have occurred?

22 A Yes. In self-defense.

23 Q Okay. And how have those kinds of  
24 homicides been reported to you typically?

25 A The same way as any other, meaning I

1 would get a 911 call, I would get a report of what  
2 happened, and contact -- and I would contact the  
3 family, because generally it takes a while to  
4 determine self-defense or, you know, what the  
5 results of this particular situation may be.

6 Q Right. And so that was -- you're  
7 getting right to my question. When in the sequence  
8 of events is it determined that a death caused by  
9 another person will not count as a criminal  
10 homicide, for example, as you've said, if the death  
11 was caused in self-defense?

12 A Originally it would be counted in the  
13 numbers, and then if it was determined that it was  
14 self-defense, it would be taken out.

15 Q And the determination of self-defense  
16 might come after a criminal trial, right?

17 A I don't know.

18 Q Well, was the Prude death counted  
19 towards the homicide count in Rochester for 2020?

20 A Not that I know of.

21 Q Okay. Have you asked anybody whether  
22 that death is one of the 38 that have occurred in  
23 Rochester this year by your count?

24 A No, I have not.

25 Q Has anybody said to you, We're not

1 going to count the Prude death as a homicide in  
2 terms of our reporting of homicides, criminal  
3 homicides, in Rochester?

4 A No, they have not.

5 Q Okay. Do you believe that someone --  
6 that there is an open question at this point as to  
7 whether the Prude death will count as a criminal  
8 homicide for this year?

9 A I don't understand the question.

10 Q Sure.

11 I mean, is it that someone has decided  
12 it's not going to count this year? You said no one  
13 has decided it is going to count. Or is it just an  
14 open question that is to be determined?

15 A I don't know who makes that  
16 determination. I think that there is an FBI or a  
17 DOJ criteria that makes that determination, and so  
18 it's not, I guess, subjective. It's based on  
19 whatever that criteria is.

20 Q Understood.

21 I guess my question is whatever  
22 criteria are applied, the ones that get reported to  
23 you as a criminal homicide, is there -- is it your  
24 understanding that whether the Prude death is going  
25 to count as a criminal homicide is a question yet to

1 be determined?

2 A Yes.

3 Q Okay.

4 A Let me clarify that. I don't know if  
5 it is in the numbers. No one has told me that it  
6 is.

7 Q Okay. You're just not sure one way or  
8 the other right now?

9 A Correct.

10 Q Okay.

11 Would you agree that a death by  
12 overdose would not be -- would be inconsistent with  
13 a finding by the medical examiner of death by  
14 homicide, right?

15 A The medical examiner had determined  
16 that three things were contributory factors for  
17 cause of death.

18 Q I see. And your point is that one of  
19 those was the fact that Mr. Prude was -- had taken  
20 PCP, right?

21 A Correct.

22 Q But there's no -- are you aware of any  
23 evidence that someone other than Mr. Prude injected  
24 him or caused him to ingest the PCP such that that  
25 person would have been responsible for homicide?

1 MS. COHEN: Andy, I'm sorry, I  
2 don't --

3 Q Let me ask it a different way.  
4 Actually, let me move on.

5 So Chief Singletary has asserted that  
6 you and he had a phone call to discuss the Prude  
7 matter on April 27. Are you aware of that?

8 A No.

9 Q Okay. Do you recall a phone call with  
10 Chief Singletary in late April on this subject?

11 A No.

12 Q Do you recall the chief telling you  
13 that the office of the Attorney General had formally  
14 taken over the investigation of the Prude matter?

15 A No.

16 Q That's not something you learned from  
17 the chief?

18 A No. It was on -- after viewing the  
19 video when we had a meeting with everyone that I  
20 recall learning of the Attorney General's  
21 information, as well as the other -- the ME's  
22 report. Not April. I'm sorry. August.

23 Q August. Uh-huh.

24 Have you ever heard that the medical  
25 examiner determined that Mr. Prude died in part as a

1 result of asphyxia in the setting of a physical  
2 restraint?

3 A Yes. After viewing the video when we  
4 had the discussion.

5 Q That was the first time you heard that  
6 phrase?

7 A Yes.

8 Q And that was on August 4?

9 A Yes.

10 Q And that was also the first time you  
11 heard that the medical examiner had determined that  
12 Mr. Prude died as a result of a homicide?

13 A The first time I heard that the  
14 medical examiner had determined that there were --  
15 what was in the report of the medical examiner, so  
16 the homicide by asphyxiation. I believe this email  
17 that you have up is not what the medical examiner --

18 Q I agree with that. Let's take it  
19 down.

20 A So I don't recall the specific words,  
21 but I believe that the order was homicide by  
22 asphyxiation, excited delirium, and then PCP. I  
23 believe that's the order that the medical examiner  
24 determined. And that all three were contributory  
25 factors.

1           Q       Right. I guess -- I appreciate that.  
2       And you're 100 percent right about that. But I'm  
3       just curious, did you ever hear prior to seeing the  
4       medical examiner's report that Mr. Prude had died as  
5       a result, at least in part, of asphyxia?

6           A       In that meeting on August 4, yes.

7           Q       But not before that?

8           A       Not before that.

9           Q       Okay. I'm going to represent to you,  
10       Mayor Warren, that in the early part of April a  
11       lawyer for the family of Mr. Prude submitted a  
12       request to the City of Rochester that they preserve  
13       all records and documents in connection with  
14       Mr. Prude's mental health arrest. When did you  
15       first become aware that -- or are you aware that  
16       that happened?

17          A       Yes. On August 4. I had a meeting  
18       with Tim Curtin, our attorney.

19          Q       Okay. That's the first time you  
20       learned that there had been a preservation request?

21          A       Yes.

22          Q       And when you learned that, you  
23       understood that the preservation request was often a  
24       precursor to a lawsuit against the City, right?

25          A       Yes.

1 Q Okay.

2 MS. COHEN: Andy, could you just make  
3 sure that she's not just confusing a  
4 preservation request and a FOIL?

5 MR. CELLI: I'm going to do all of  
6 them, actually.

7 Q So I will represent to you that when  
8 I'm talking about a preservation request, I'm  
9 talking about a letter from a lawyer that asks an  
10 agency to simply preserve and keep records and  
11 documents concerning a particular matter, not a  
12 request to publicly -- to release that information  
13 to a requester. Do you understand the difference?

14 A So can you repeat -- I understand the  
15 difference now, but can you repeat your question?  
16 Because that would change my answer.

17 Q Sure. Let me -- yes. I want to get  
18 the right answer.

19 So have you ever heard that the Prude  
20 family, through its attorney, made a request in  
21 early April for the City of Rochester to preserve  
22 records and documents concerning the mental health  
23 arrest of Mr. Prude?

24 A No.

25 Q Okay. As you -- this is the first



1 time you're hearing it today; is that correct?

2 A No, it's not. I'm saying at that  
3 point in time in April I did not know. I did not  
4 know about the preservation request until after the  
5 deputy mayor did his report.

6 Q Got it. Thank you. That's helpful.

7 I will also represent to you that in  
8 the early part of April a lawyer representing the  
9 family of Mr. Prude made a request for the  
10 disclosure of information pursuant to the Freedom of  
11 Information law. You're aware of that, right?

12 A I did not know at the time, but I  
13 learned -- since learned when the deputy mayor did  
14 his report.

15 Q Okay. That's helpful.

16 So am I correct in saying that the  
17 first time you became aware that there was a Freedom  
18 of Information law request from the Prude family was  
19 sometime after September 14 when the deputy mayor  
20 issued his managerial report?

21 A No. So let me just get my bearings  
22 and understanding.

23 So after August 4, which I saw the  
24 video, we had a discussion on the -- about the ME's  
25 report, about the AG's office, and about the video,

1 and that discussion was with the corporation  
2 counsel, the deputy mayor, as well as the police  
3 chief.

4 After -- that was I believe about an  
5 hour and a half meeting on this.

6 Sometime after the video had been  
7 released, we asked the law department, because there  
8 were some issues going back and forth between the  
9 AG's office and the law department about what was  
10 said, when it was said, what was requested -- the  
11 law department put together a time -- a timeline.  
12 And in that timeline, for their notification, all of  
13 their information and when and how those things came  
14 through was on that timeline.

15 Additionally, a timeline had been  
16 created for the media, and the deputy mayor had also  
17 included a timeline in his report.

18 Q Got it.

19 A So between those three incidences is  
20 where I found out about all of this. And that was  
21 after I viewed the video on August 4. So I would  
22 learn of all those things between August 4 and  
23 September 17.

24 Q So I'm going to share with you what  
25 we've previously marked as Warren Exhibit 10. And

1 you see at the top it's an email from Tim Curtin to  
2 you and the deputy mayor and others dated September  
3 3, and below that is the timeline that is an email  
4 from Stephanie Prince to Tim Curtin of the same date  
5 a little bit earlier in the day.

6 Is this the law department timeline  
7 that you transferred in your last answer?

8 A Yes.

9 Q And it was when you received this  
10 message that you first learned that there was a  
11 preservation -- I'm sorry -- that there was a FOIL  
12 request submitted to the City by the Prude family's  
13 lawyer?

14 A No. I actually meant that there was a  
15 FOIL request for the video that the law department  
16 was going to release, and that was the reason why  
17 the corporation counsel was showing me it on August  
18 4.

19 Q Okay. That's clarifying.

20 And when you received this law  
21 department timeline, is this the first time you  
22 learned that there was a preservation letter that  
23 the family of Mr. Prude, through their attorney, had  
24 submitted to the City of Rochester? And I'll just  
25 direct you to the note of April 3, the first entry

1 of Ms. Prince's timeline.

2 A Yes.

3 Q Okay. So prior to August 4 you were  
4 not aware that a FOIL request had been made by the  
5 Prude family for documents concerning the Prude  
6 mental health arrest?

7 A Correct.

8 Q I want to ask a few questions about  
9 the period between April 27, 2020 and August 4,  
10 2020.

11 During that period did you come to  
12 learn that the Major Crimes Unit at the RPD had  
13 conducted an investigation of officers involved in  
14 the Prude incident?

15 A No.

16 Q As you sit here today, are you aware  
17 that the MCU conducted that investigation?

18 A Yes.

19 Q When did you learn that information,  
20 that there had been an investigation of the officers  
21 conducted by the Major Crimes Unit?

22 A The first time that I remember this  
23 issue coming up was at a press conference where one  
24 of the media had asked the chief, and he had said  
25 that there had been no determination as to the

1 attorney -- as to officers' actions at that time.  
2 However, then later when the deputy mayor did his  
3 report is when I believe was the first time I knew  
4 that they had actually did a report and had the  
5 finding that they had.

6 Q And did you conclude that the chief  
7 had misspoken or not been forthright in his  
8 statement at the press conference about the Major  
9 Crimes Unit?

10 A I don't know -- I don't know as I sat  
11 there at the press conference at that time that -- I  
12 can't say that he knew because there was a lot of  
13 things that I didn't know. So I can't -- I don't  
14 know.

15 Q Okay. Just so I'm clear, the first  
16 time that you understood there was a Major Crimes  
17 Unit investigation of the Prude matter was when you  
18 heard about it at the press conference from Chief  
19 Singletary; is that correct?

20 A No. It was -- a reporter asked was  
21 there -- I can't remember word for word, but I  
22 remember a reporter asking had there been a  
23 determination into the officers' conduct, and the  
24 answer, I believe, was no, there was no  
25 determination, because we were waiting for the AG's

1 office to get back to us.

2 Q Right. I guess my question, Mayor, is  
3 whether that was the first time you understood that  
4 the Major Crimes Unit of the RPD had conducted or  
5 was conducting an investigation of these officers in  
6 connect with Prude?

7 A I didn't know that the Major Crimes  
8 office was conducting a review. My understanding  
9 had always been that PSS was the ones that was  
10 conducting the review.

11 Q Okay. Now, during the period from  
12 late April till August 4, there were some  
13 circumstances that arose in Rochester involving the  
14 conduct of members of the Rochester Police  
15 Department, right? In general, there were some --  
16 we talked earlier about an incident in June  
17 involving an arrest of the bystander, for example.  
18 Do you recall that?

19 A Yes.

20 Q And you recall that one of the issues  
21 that came up was that in mid May it came to light  
22 that a member of the RPD had handcuffed a  
23 10-year-old child?

24 A Yes.

25 Q And what do you recall about that

1 issue?

2           A       I received a phone call from a county  
3 legislator who was friends with the family that was  
4 very upset about the 10-year-old being handcuffed.  
5 I had also received video from the Facebook video  
6 and reports from people in the community. I had had  
7 a discussion with the chief about this matter, and I  
8 reviewed the body-worn camera video. The chief and  
9 I went over, you know, what I thought was -- should  
10 have been done differently within the video. We  
11 talked about looking at our policies and procedures  
12 about handcuffing a child, and I met with the  
13 family.

14           Q       How did it come to pass that you  
15 reviewed the body-worn camera video from the  
16 incident involving the 10-year-old?

17           A       I had first seen the Facebook video,  
18 and it was not very clear. So I requested to see  
19 the body-worn camera video as well.

20           Q       And when you say you requested it, did  
21 you ask Chief Singletary to secure it for you?

22           A       Yes.

23           Q       And he did that?

24           A       Yes.

25           Q       And how -- logistically, how did you

1 actually view it? Did he forward it to you on an  
2 email, or did you go to his office, did he come to  
3 your office? How did that happen?

4 A I don't remember. I just know that I  
5 saw it.

6 Q And in this time frame were you aware  
7 that members of the press had made Freedom of  
8 Information requests for the body-worn camera  
9 [verbatim] of the child being handcuffed?

10 A I believe so, yes.

11 Q And did you ask Mr. Roj and the folks  
12 at the communications department to make it a  
13 priority to release body-worn camera footage of  
14 the -- that showed the child being handcuffed?

15 A I don't remember if I -- I think -- I  
16 don't remember if I said make it a priority or that  
17 we needed to deal with, you know -- to make sure  
18 that we dealt with this situation.

19 Q Okay. Well, have you ever heard,  
20 Mayor Warren, that preparing the body-worn camera  
21 video footage from the handcuffing of the  
22 10-year-old was something that caused personnel to  
23 stop work on review and redaction of body-worn  
24 camera footage from the Prude incident so that they  
25 could work on the video with respect to the



1 10-year-old?

2 A No, I had not heard that until  
3 recently. And it shouldn't have.

4 Q When you say "recently," what do you  
5 mean?

6 A I did not hear that until the chief  
7 asserted that in his Notice of Claim.

8 Q Got it.

9 So before that, before you read that  
10 document, you had never heard from any source that  
11 by making the videotape about the 10-year-old --  
12 having that be released, that it had diverted a  
13 resource from reviewing the videotape of the Prude  
14 matter?

15 A It should not have. I had never heard  
16 that before. And one -- it should not have.

17 Q Tell me why you say that, when you say  
18 "it should not have." What do you mean by that?

19 A Because there are a number of  
20 different people that can redact and provide the  
21 redactions for body-worn camera video. So the issue  
22 with the 10 -- I mean, you don't take an entire team  
23 to redact one video and -- over another. You could  
24 do both at the same time.

25 Q Got it.

1                   Have you undertaken to figure out  
2 whether or to what degree the production of the  
3 video with respect to the 10-year-old may have  
4 delayed the release or the redaction of material  
5 from the video involving the Prude incident?

6                   A        Have I --

7                   Q        Have you figured out whether that  
8 actually created some delay? And if so, how much?

9                   A        No, I have not figured that out,  
10 because that's something that was just arisen.

11                  Q        Okay.

12                  A        And I don't believe that it should  
13 have; that I don't believe that -- I believe that we  
14 could do two videos at the same time.

15                  Q        Right. During the period that you  
16 were aware that there were requests for the video  
17 about the 10-year-old, of the 10-year-old being  
18 handcuffed, were you also aware at that time that  
19 body-worn camera video of the Prude incident was  
20 being prepared or was being redacted in connection  
21 with a request?

22                  A        No.

23                  Q        Okay. As you sit here today, are you  
24 aware that in June of 2020 there were discussions  
25 between the law department and the RPD at a high

1 level about whether to release body-worn camera  
2 footage of the Prude incident in response to a  
3 request?

4 A As I sit here today, yes.

5 Q Right. And when is the first time you  
6 became aware that those conversations were  
7 happening?

8 A After I viewed the video on August 4.

9 Q And what was the context in which you  
10 learned that there had been discussions back in June  
11 between the PD and the law department?

12 A I don't believe on August 4 the date  
13 was what was part of the discussion; it was more in  
14 general. So I would go back to that through the  
15 course of viewing the video on August 4 to the  
16 deputy mayor's report on September 17, there were a  
17 lot of things that I became aware of that I didn't  
18 know was happening.

19 Q Fair enough.

20 My question was when you first heard  
21 on August 4 that there had been discussions between  
22 the law department and the PD going back to June,  
23 was it your understanding that the senior members of  
24 the police department were opposed to releasing the  
25 body-worn camera from the Prude incident?

1           A       No. On August 4, the corporation  
2       counsel had come to inform me that they had no legal  
3       basis for withholding the video from the Prude  
4       family into -- and releasing it, and was explaining  
5       to me the situation behind the Prude incident.

6           Q       Understood. I appreciate that answer.  
7       My question is a little bit different, which is  
8       whether on August 4, in the context of any of these  
9       discussions, you learned that the police department  
10      was opposed to release of the body-worn camera  
11      footage from the Prude incident.

12          A       No. On August 4 it was more so about  
13      the AG's investigation and what the -- what our  
14      corporation counsel and the police department  
15      believed would be an adverse effect on that  
16      investigation.

17          Q       What can you tell us about your  
18      experience as mayor reviewing body-worn camera  
19      footage from the RPD? How does the process  
20      generally work?

21          A       So there's several different ways that  
22      body-worn camera comes to my attention. So when we  
23      first brought body-worn camera videos to the City of  
24      Rochester, it was because we wanted to have as much  
25      transparency as possible and wanted to be able to

1 train from the body-worn camera video, but also to  
2 give our residents the understanding that we were  
3 going to be looking at these videos and, you know,  
4 protect them, protect our officers, and be able to  
5 have a transparent recollection of what transpired  
6 during an investigation or an interaction with our  
7 police department.

8           Several -- it took us a while to get  
9 the body-worn camera policy right. And at the  
10 time -- it was Chief Simonelli who was the chief at  
11 the time.

12           We also had a relationship set up with  
13 a community organization that was led by Reverend  
14 Seward and his -- and UCLM, and also the ACLU and  
15 others were a part of that, that met quarterly to  
16 review certain interactions with the police and  
17 body-worn camera video. I could get a call from  
18 that review with residents, community people, that a  
19 sergeant -- any time there was a use of force claim,  
20 that a use of force form that was filled out by an  
21 officer indicating that they had used force on a  
22 resident in an arrest, that that would be reviewed  
23 by a supervisor. The supervisor would review that  
24 to determine if the police officer was acting in  
25 accordance with policies and procedures. If they

1 believed that it was not within the scope of the  
2 policies and procedures, they would then send that  
3 up the chain of command, and at times PSS would open  
4 an investigation if there was a significant issue  
5 regarding what was shown on the body-worn camera  
6 video.

7 I get informed of that through the  
8 chief in regular scheduled meetings. If there is a  
9 disciplinary issue, that is -- that may result in a  
10 lawsuit to the City, or if there are also, I guess,  
11 requests to -- from residents through the Office of  
12 Constituent Services that may call and say, you  
13 know, I felt like I was treated wrong, or, I saw  
14 this and this is where I saw it at, and then I would  
15 call and I would say, I want to see the body-worn  
16 camera video on this day on this time, explain the  
17 reason why, and we would go from there.

18 Q Got it. And so that's very helpful.

19 Just to pick up right where you left  
20 off, so when you would call, you would call Chief  
21 Singletary, or the chief at that time?

22 A Yes.

23 Q And what were the next steps that  
24 would happen? You call the chief and say, I want to  
25 see the body-worn camera from thus-and-such incident

1 or date, and then what? How would it actually get  
2 to you?

3 A So sometimes it would be emailed to me  
4 on the drive, or sometimes I would go over to PSS to  
5 review.

6 Q And PSS is in the public safety  
7 building?

8 A Yes. Or sometimes they would come to  
9 my office and review.

10 Q Okay. So I guess there's three ways.  
11 One is that you would have access through an email  
12 link; is that right?

13 A Right.

14 Q One is that you would go over to the  
15 public safety building, to the police department's  
16 Professional -- I'm blanking on it -- PSS and watch  
17 it there?

18 A The chief's office.

19 Q To the chief's office.

20 And the third is the people from PSS  
21 would come to your office, what, with a disc or a  
22 laptop and show you that way?

23 A They would show it -- I'm not sure if  
24 they have a disc, but there's a system that they  
25 would access in my office.

1 Q Got it. Okay.

2 Have you ever been told during your  
3 time as Mayor that you were not permitted to review  
4 body-worn camera video for a particular incident for  
5 any reason?

6 A No.

7 Q So every time you've asked, they've  
8 said yes; is that fair?

9 A Yes.

10 Q Okay. And there have been  
11 circumstances where you have asked that the police  
12 department share body-worn camera footage with  
13 members of the city council also, right?

14 A Both. So city council can and have  
15 always been -- and have always requested on their  
16 own, the same as I, to see body-worn camera video  
17 whenever they want to. So constituents may contact  
18 them directly and say, This is what happened to me,  
19 and they will contact the police department outside  
20 of my office, they would go directly to the police  
21 chief or whomever in the police department and ask  
22 to see the video.

23 If it's an issue that has risen to my  
24 level about an incident that has occurred, I would  
25 either inform them, and they can see the body-worn



1 camera on their own. I would inform them of the  
2 issue, not necessarily inform them that they should  
3 see the video.

4 Q Got it. And let's just start with  
5 that.

6 So when that kind of thing -- that has  
7 happened in the past, right?

8 A Yes.

9 Q And when that happened, where you  
10 inform them of an issue, was it your understanding  
11 that council members would then directly interface  
12 with the RPD in order to get access to the body-worn  
13 camera video?

14 A Yes.

15 Q And do you recall any circumstances  
16 where members of the council asked to review  
17 body-worn camera footage and you were not aware of  
18 the incident before you learned that council had  
19 asked for this information?

20 A Can you repeat the question?

21 Q Yeah. Let me see if I can ask it a  
22 little more directly.

23 You testified that council members  
24 were authorized to call the police department  
25 directly and say, I want to see body-worn camera

1 footage from thus-and-such incident, right?

2 A Yes.

3 Q And my question to you is did you ever  
4 hear that that happened about an incident that you  
5 were not previously aware of?

6 A Yes.

7 Q What was the incident where that  
8 happened?

9 A I don't remember the incident per se,  
10 I just remember, like, receiving either an email or  
11 call saying that, Council Member Patterson or  
12 Council Member Lupien would like to see this video.  
13 Here is the incident that they are calling about.  
14 So it wasn't like a specific -- nothing alerts me  
15 that there was something that -- that happened that  
16 I was not -- that they were contacted directly by a  
17 constituent that they wanted to see this particular  
18 video, and I was just being notified that they were  
19 going to show them this particular video.

20 Q Got it.

21 In those situations, Mayor Warren, was  
22 it your belief that you were being asked to  
23 authorize the council members to review the video,  
24 or you were just being notified that they had  
25 requested it and the PD was going to go ahead and do

1 it, whatever you said?

2 A I never author -- I never had to  
3 authorize council seeing a body-worn camera video.  
4 They can -- they have the ability to ask to see it.  
5 I was just being notified just in case something  
6 came out of the video that I might needed [verbatim]  
7 to be aware of.

8 Q Right.

9 And in cases where members of the  
10 council asked to review body-worn camera video and  
11 you had not yourself heard about the issue before  
12 but you learned of it by being notified by the  
13 department, as you've testified, did you ask to also  
14 see the same video?

15 A At times, yes. At times, no. Because  
16 what would happen is if there was an issue that  
17 council has seen a video and thought that there was  
18 a problem, they would contact me.

19 Q Got it.

20 So if you had learned -- if you  
21 learned about an incident by this method, that is,  
22 the department telling you that council -- somebody  
23 at council was asking to see a video of a particular  
24 incident, you might say, I'd like to see the same  
25 one, or you might say, Thanks for telling me, and

1 then if it turned into something important, you  
2 assume you would learn about it from council  
3 directly?

4 A So can you break that down --

5 Q I'm trying to summarize -- so in the  
6 situation where you hear from the police department  
7 that somebody at council has asked to see video of a  
8 particular incident, okay, and that incident is not  
9 one that you were previously aware of or that you  
10 had previously seen the video of -- okay?

11 A Okay.

12 Q I asked whether you always asked to  
13 see the video that's going to be shown to the  
14 council, and your answer was, Not always. Sometimes  
15 I would, and sometimes I wouldn't. Right?

16 A Correct.

17 Q And in situations where you wouldn't  
18 ask, was it your assumption and understanding that  
19 if there were a problem with the way the officers  
20 behaved on the video, that you would hear about that  
21 because a council member who was reviewing it would  
22 contact you?

23 A Either the council member or the  
24 police department.

25 Q Okay. Okay.

1           A           Because remember, the way that the  
2 process worked is a sergeant or somebody, a  
3 supervisor, would review, and any use of force case,  
4 a sergeant would review it or a supervisor would  
5 review it, and then if they thought that there was a  
6 problem, then they would kick it up the chain of  
7 command.

8                       So there may be a situation where a  
9 supervisor might have determined that there was  
10 nothing that was done that was outside of normal  
11 protocols and procedures and it never went up the  
12 chain of command. And so a council member might  
13 have heard from a constituent saying, Hey, listen,  
14 this is a situation that happened and I want to see  
15 the video, that the chain of command hadn't seen or  
16 hadn't been aware of either.

17                      So if there was a problem in that  
18 particular video, either city council would contact  
19 and say, Hey, listen, I saw this video and, you  
20 know, I didn't appreciate X, Y, and Z, or the police  
21 department would say, I saw the video -- the council  
22 member asked me to see the video, and when we looked  
23 at the video, this is what we saw, and this is what  
24 we're going to do about it.

25           Q           Got it.

1                   At any time prior to September 2, did  
2 you hear that a member of the city council had  
3 requested to review body-worn camera footage from  
4 the Prude incident?

5                   A       No.

6                   Q       As you sit here today, are you aware  
7 that that happened?

8                   A       No, I'm not.

9                   Q       Okay. So --

10                  A       Where they denied?

11                  Q       I'm sorry?

12                  A       Where they denied?

13                  Q       No. I'm just asking whether you ever  
14 heard that anybody asked for --

15                  A       No.

16                  Q       Have you ever -- that's an interesting  
17 question, too. I mean, have you ever had the  
18 experience as mayor of learning that somebody on the  
19 council wanted to see body-worn camera footage and  
20 you directing the police department not to provide  
21 that footage?

22                  A       No. They -- council had just as much  
23 right as I to see video, and they were never denied.  
24 And they often requested to see video of incidences  
25 that their constituents, our constituents, called

1       them about.

2                   Q       Right.

3                               So we're in this period of basically  
4       April through August 4.  And you recall that George  
5       Floyd was killed by police on May 25, 2020, right?

6                   A       Yes.

7                   Q       And there were demonstrations that  
8       resulted from that killing across the country during  
9       that period, right?

10                  A       Yes.

11                  Q       And there were demonstrations in  
12       Rochester in the wake of the Floyd killing, as well,  
13       right?

14                  A       Yes.

15                  Q       Do you recall a discussion -- a  
16       one-to-one discussion with Chief Singletary on May  
17       26 about -- concerning demonstrations flowing from  
18       the George Floyd killing?

19                  A       I recall having discussions about the  
20       protests, but I don't specifically recall it being  
21       one to one.

22                  Q       Okay.  What do you recall about the  
23       discussions -- let me ask it a different way.

24                               In any discussions between you and  
25       Chief Singletary prior to September 2, 2020

1 concerning the demonstrations arising out of the  
2 George Floyd killing, did the issue of the Prude  
3 mental health arrest arise?

4 A No.

5 Q In any discussions that you had with  
6 anybody in city government concerning the  
7 demonstrations after the Floyd killing, did the  
8 issue of the Prude mental health arrest arise prior  
9 to September 2?

10 A No. Wait, hold on.

11 MS. COHEN: Do you mean August 4 or  
12 September 2?

13 MR. CELLI: September 2. I'm talking  
14 about September 2 now.

15 A So can you repeat the question?

16 Q Yeah.

17 Did you have any discussions with  
18 anybody in city government before September 2? And  
19 I'm selecting that date because that's the date that  
20 the Prude video was released by the family. Did you  
21 have any discussions with anybody in city government  
22 up to that date about the demonstrations arising  
23 from the Floyd killing in which the Prude incident  
24 also arose?

25 A When I viewed the video on August 4,



1 the -- we talked about the fact that there probably  
2 would be protests that resulted from the release of  
3 this video.

4 Q And what was said on that topic and by  
5 whom?

6 A Just in general, that given the nature  
7 of the video, that we could -- you know, in the  
8 release of the video to the family and the fact  
9 that, in my assertion and opinion, this video was  
10 very heart-wrenching, and that Mr. Prude had been --  
11 that he had been killed, that this would be a  
12 problem. And that's why I was very concerned about  
13 how we -- how we would tell the public, and I was  
14 instructed that I couldn't.

15 Q That you couldn't what?

16 A I could not talk about this publicly  
17 because of the AG's investigation.

18 Q And who instructed you along those  
19 lines?

20 A Our corporation counsel.

21 Q And that was in the meeting on  
22 August 4?

23 A Yes.

24 Q So we're going to go over that meeting  
25 in some detail. We'll come back to that.

1           Other than what you just testified  
2 about, did the issue of the Prude incident arise in  
3 the context of any other discussions within city  
4 government that you're aware of concerning the  
5 protests in the wake of the Floyd killing?

6           A       At that point in time, I was not aware  
7 of any discussions. However, my understanding,  
8 after the deputy mayor's report there was a  
9 discussion that took place within the police  
10 department about this.

11          Q       That's something you didn't learn  
12 about until after September 14?

13          A       Yes. After the deputy mayor's report.

14          Q       Were you surprised to see that members  
15 of the police leadership, including Chief  
16 Singletary, had expressed concerns about releasing  
17 the Prude body-worn camera video in the context of  
18 ongoing demonstrations after the George Floyd  
19 killing?

20          A       Yes. Because I always believed that  
21 the Prude incident was an overdose, that he had  
22 passed away from PCP -- a PCP overdose and not from  
23 the actions -- or any actions that was done by our  
24 police department.

25          Q       Okay. Mayor, I will represent to you

1 that the family of Mr. Prude filed a Notice of Claim  
2 with the City of Rochester on July 30. When did you  
3 first become aware -- you're aware of that fact as  
4 you sit here today, right?

5 A Yes, I was aware -- made aware of that  
6 on August 4.

7 Q Okay. Did the fact that the Prude  
8 family had expressed an intention to sue the City  
9 enter into your consideration about how to notify  
10 the public about the Prude matter?

11 A The fact that the family had -- not  
12 that they were going to sue the City, but the fact  
13 that we had this video, that it was -- the ME's  
14 report, it was all of the circumstances surrounding  
15 the video once I learned of it on August 4.

16 Q Right. But I'm trying to ask the  
17 question a little more narrowly, which is when you  
18 first learned that the Prude family had announced an  
19 intention to sue because they filed a Notice of  
20 Claim, did that fact enter into your consideration  
21 about whether and how to notify the public that  
22 there had been an encounter between Mr. Prude and  
23 members of the RPD and that he had died, in part, as  
24 a result of that?

25 A There's not -- it's not separate and

1 distinct for me, because it all happened at the same  
2 time on August 4.

3 Q Okay. So would it be fair to say that  
4 one of the things that you considered in determining  
5 whether to notify the public about the Prude  
6 incident was the fact that the family of Mr. Prude  
7 had filed a Notice of Claim?

8 A It was a total understanding more so  
9 about everything that had happened as it relates to  
10 Mr. Prude.

11 Q Right. And one of the things that had  
12 happened that you were aware of at that point was  
13 the fact that the family had expressed an intent to  
14 bring a lawsuit against the City?

15 A Yes, that was part of that discussion.

16 Q Other than what you've already talked  
17 about -- well, so I'm going to delve into a meaty  
18 section here, Mayor. We can keep going. We can  
19 take a short break if you want to get a bite, or  
20 take a shorter break and just relax, or we can just  
21 plow into it. But I probably have a good, you  
22 know -- this next section is pretty significant, and  
23 so it's going to be lengthy.

24 A We can keep going if you're okay.

25 MR. CELLI: Carrie, you good?

1 MS. COHEN: The court reporter. I  
2 don't know if the court reporter -- do you  
3 want to maybe break at 1:00, Andy, so you  
4 get at least a big chunk of it done?

5 (A discussion was held off the  
6 record.)

7 BY MR. CELLI:

8 Q Mayor Warren, other than what you've  
9 already testified to, were there any other contacts  
10 or communications between you and anybody else in  
11 city government between early April and August 4,  
12 2020 concerning the Prude matter?

13 A No, not that I remember, no.

14 Q And there came a time on August 4 when  
15 you had a meeting or series of meetings about the  
16 Prude matter, right?

17 A Yes.

18 Q I'm going to show you what we  
19 previously marked as Warren Exhibit 4. And this is  
20 an email from Tim Curtin to you at 12:33 on August 4  
21 regarding confidential attorney-client privilege.  
22 Do you see that?

23 A Yes.

24 Q And as you look at that, is it your  
25 understanding that what's -- what is this email?

1 Just so we're clear.

2 A So this email is an email from Tim  
3 Curtin of the video of the Daniel Prude death.

4 Q Is this Mr. Curtin forwarding to you  
5 body-worn camera footage of the encounter between  
6 Mr. Prude and the RPD?

7 A Yes.

8 Q And is he also forwarding to you the  
9 medical examiner's report concerning Mr. Prude's  
10 death?

11 A Yes.

12 Q And what was the context in which you  
13 received this? What were the circumstances?

14 A Mr. Curtin asked me had I been briefed  
15 or did I know about or see this video from the  
16 incident with Daniel Prude, and I said no, and he  
17 said that I needed to see the video.

18 Q Got it.

19 When Mr. Curtin said that to you, did  
20 the name Daniel Prude specifically mean anything to  
21 you?

22 A No, it did not.

23 Q Did Mr. Prude -- Mr. Curtin describe  
24 to you the nature or the circumstances of  
25 Mr. Prude's encounter with police, or did he just

1 say, This is the Daniel Prude video?

2 A No. He said -- he called me and said,  
3 Did you -- have you seen this video from the police  
4 department regarding this arrest? And I said no, I  
5 had not. No, I had not. And he said, You need to  
6 see this video.

7 Q Uh-huh.

8 A And so he said that he was going to  
9 send me the video and come down.

10 Q Got it. And did he do that?

11 A Yes.

12 Q And did that happen around 12:30 on  
13 the 4th?

14 A Yes.

15 Q And what happened next?

16 A I watched the video, and I became very  
17 disturbed at what I saw. I said to -- well, first  
18 the deputy mayor and the corporation counsel watched  
19 the video with me.

20 Q Right.

21 A I became very upset and very disturbed  
22 by what I saw. And I said, This is not what the  
23 chief had represented happened. I believed this was  
24 a PCP overdose and that -- you know, that this  
25 gentleman died from a PCP overdose, and this wasn't

1 what I was told, that everything was done by the  
2 book.

3 I immediately called the chief to my  
4 office and I began to yell and to scream about the  
5 video and what the video showed, and I told him that  
6 I believed that Mr. Prude had been killed; that the  
7 sock around his head was actually tightened; that  
8 they were doing a plank on Mr. Prude's head. That  
9 one part of the video that was very disturbing to me  
10 that I showed the chief and asked him what he saw,  
11 was I paused it at -- there's a part on Mr. -- on  
12 the officer's name escapes my mind at this point in  
13 time -- one of the video cameras that I was looking  
14 at and where the -- one of the officers that is on  
15 the back -- or, you know, in back of Mr. Prude,  
16 after he stopped breathing looks up into the camera.  
17 And I froze that part and I said, What do you see?  
18 What is your officer telling you? And he said,  
19 Well, nothing. I said, He's terrified. He looks  
20 like, We just killed this guy. We made a mistake or  
21 something's wrong here. He looks completely upset,  
22 the officer -- you know, I was looking at Officer  
23 Vaughn's camera. I don't know who the other officer  
24 was.

25 You know, and I asked, Was this proper



1 technique? You know, you said that this whole thing  
2 was done by the book. And he asserted that this was  
3 proper technique; that this was -- you know, that  
4 they had followed policy and procedure; that there  
5 was nothing wrong with what the officers did here.

6 I also spoke about how Mr. Prude was  
7 treated, you know, the laughing, the taunting, the  
8 repeating of "scoop crazy, scoop crazy." You know,  
9 that sort of -- I asked, Do you think that that is  
10 okay? Is that proper behavior? The laughing and --  
11 you know, you know that he's not in his right mind  
12 and you're doing that? Like, how could you not  
13 think that this video was a problem? And he said  
14 that he didn't believe that it was. And we went  
15 into, Now what is it that we're going to do?

16 And I want to clarify something from  
17 before, because I want to be clear when I say that  
18 the determination not to release this to the public  
19 had nothing to do with the lawsuit or the claim  
20 against the City. It had everything to do with the  
21 Attorney General's -- at the time, my understanding  
22 based on the law department's understanding, that  
23 the Attorney General would not -- asked us not to  
24 release anything regarding this.

25 So regardless of whether there's a

1 lawsuit pending against the City or not didn't have  
2 anything to do with whether we were going to release  
3 it; it had to do with that we were under the  
4 guidance of another state agency who, at the time, I  
5 understood from our corporation counsel, told us  
6 that we could not talk about this.

7 Q Got it. Okay. Thank you.

8 I want to go back and ask some  
9 clarifying questions.

10 How did you come to connect -- you  
11 testified before that you were not aware of the name  
12 Daniel Prude when the corporation counsel brought  
13 this video to your attention. How did you come to  
14 connect this video with the report that you'd  
15 received on March 23?

16 A When I watched the video.

17 Q And so when you put the video on and  
18 you observed that -- by viewing it, you realized  
19 that this was the same incident that the chief had  
20 told you about back on the 23rd of March?

21 A Yes.

22 Q And what was it about the video that  
23 caused you to reach that conclusion, if you recall?

24 A That -- the video and the fact that he  
25 was on drugs and the time frame.

1 Q I'm sorry, I missed that last piece.

2 A So the video was in March, so I  
3 would -- you know, and when I watched the video, I  
4 immediately knew that that was the incident.

5 Q From the date?

6 A Yes. From the date and the video.

7 Q And so what was it about what was  
8 shown on the video that caused you to connect this  
9 video to the incident that had been reported to you  
10 in March?

11 A Because the -- there's a part in that  
12 video where the AMR person says that, This isn't  
13 your fault. This gentleman is on drugs and this is  
14 what happens.

15 Q I see.

16 And so since you had been told in  
17 March on the 23rd that the person who had had an  
18 interaction with police was on drugs, you sort of  
19 put those two things together and assumed this was  
20 the same?

21 A Yes.

22 Q Got it.

23 A Yes.

24 Q Okay. Was the date of March 23  
25 visible on the videotape that you watched or did you

1 learn of that date some other way?

2 A I don't remember.

3 Q We still have this exhibit up. I  
4 don't see the date when the tape was made as being  
5 visible on the email. You would agree?

6 A No. If you open up -- if you open up  
7 the file, generally somewhere it shows some  
8 additional information.

9 Q Got it. Okay.

10 A On the video itself.

11 Q Got it.

12 So there was a period when you watched  
13 the videotape with the corporation counsel and the  
14 deputy mayor before the chief arrived; am I right  
15 about that?

16 A Yes.

17 Q Was anybody else in the room with you  
18 during that period?

19 A No.

20 Q And you testified a minute ago pretty  
21 extensively about your communications with the chief  
22 when he was in the room. Who else was present with  
23 you and the chief when you reviewed the video and  
24 had the interaction that you just described with  
25 him?

1           A       The deputy mayor and the corporation  
2       counsel.

3           Q       Okay.  So other than viewing the  
4       video, which you've testified about, what was the  
5       conversation that occurred on August 4 before the  
6       chief arrived at your office between you, the deputy  
7       mayor, and corporation counsel?

8           A       I was just visibly upset about the  
9       video and was expressing my frustration that this  
10      was not what I believed to have occurred.  And, you  
11      know, everybody was expressing their sentiment that  
12      this video was really bad and not in accordance with  
13      our -- what we believed to be in accordance with our  
14      policies and procedures.

15          Q       Got it.

16                    When you expressed your frustration,  
17       as you said a minute ago, about the video showing  
18       something that was not what you believed to have  
19       occurred, did you tell people in the meeting, that  
20       would be the deputy mayor and the corporation  
21       counsel, that the circumstances had been represented  
22       to you differently by the chief?

23          A       I told them what my understanding was,  
24       that this was a PCP overdose.

25          Q       Right.  And I appreciate that you're

1 being very careful in telling me your understanding.  
2 But I'm asking a little bit different, whether you  
3 said to them, This is not what the chief told me.  
4 The chief told me something different.

5 A I believe I did say that, that this is  
6 not what he said to me. He told me that everything  
7 was done by the book and that this was, you know, a  
8 PCP drug overdose in an in-custody death. This was  
9 not -- that's not what I see on this camera. Like,  
10 this is -- if Officer -- to me, and I said this  
11 expressly, if Officer Vaughn wasn't on that day, I  
12 truly believe that Daniel Prude would still be  
13 alive.

14 Q Okay. And was there a discussion  
15 prior to the chief arriving with corp. counsel and  
16 Deputy Mayor Smith about precisely what the chief  
17 had told you the circumstances of the arrest had  
18 been, other than what you've already testified  
19 about?

20 A I said exactly what I recall the chief  
21 saying to me to them.

22 Q Okay. And other than that, you don't  
23 recall any other discussion?

24 A Correct.

25 Q Thank you.

1                   Prior to the chief arriving, did you  
2 review the medical examiner's ruling that was  
3 attached to the email that had been sent you by  
4 Mr. Curtin?

5                   A       I don't remember if we reviewed that  
6 prior to or after he got there.

7                   Q       Okay. Well, tell me the discussion as  
8 best you recall it on August 4 around the medical  
9 examiner's report.

10                  A       The medical examiner -- so it was part  
11 of reviewing the video and then recognizing that  
12 there was a determination by the medical examiner  
13 that there was death by homicide by asphyxiation,  
14 the excited delirium and then PCP, and there was a  
15 discussion about because -- you know, the deputy  
16 mayor was stating that just because it said  
17 homicide, a medical homicide is different than an  
18 actual homicide, if you understand what I mean.  
19 That "homicide" in medical terms means something  
20 different, and was explaining that, and that they  
21 were all talking about the medical term "homicide."

22                  And I was adamant that I believed that  
23 Daniel Prude was actually, you know -- that our  
24 action, our officers' actions, actually led to his  
25 death, because there's a part in the video where I

1 believe that the sock is tightened around his face,  
2 and when Officer Vaughn then does the plank on him,  
3 that is, in my estimation of the video -- and this  
4 is just my estimation -- that that sock is tightened  
5 around his face with the plank, that that is  
6 actually choking him. And had that not been done,  
7 in my assertion, that this wouldn't have happened.

8           And so the chief maintained that this  
9 technique, how it was applied, was in accordance  
10 with policies and procedures and that he did not  
11 believe that that was an issue. And we went through  
12 the medical examiner's determination and the fact  
13 that the AG's office would be looking into all of it  
14 as part of their review.

15           Q       Your viewing of the body-worn camera  
16 video on August 4, was that the first time you  
17 became aware that a spit sock had been placed over  
18 Mr. Prude's head?

19           A       Yes.

20           Q       Okay. And had you ever -- were your  
21 aware of that technique as something the police  
22 would do from time to time when they were arresting  
23 somebody? Before this.

24           A       I don't remember, no.

25           Q       Okay. And in your conversation -- so



1 we're -- at any point on August 4, did you tell the  
2 deputy mayor and corporation counsel that what you  
3 viewed on the tape was a far cry from what Chief  
4 Singletary had told you had occurred?

5 A Yes, because it was. This is  
6 something that the chief and I fundamentally  
7 disagree on. What I see in that video is not  
8 something that the chief sees in that video.

9 Q And was there any discussion on August  
10 4 about disciplining the officers involved in this  
11 incident?

12 A Yes.

13 Q And who was present for that  
14 discussion?

15 A The chief, the corporation counsel,  
16 and the deputy mayor.

17 Q And what was the discussion as you  
18 recall it?

19 A I said that I wanted to suspend the  
20 officers, and the chief said that he did not believe  
21 that the officers did anything wrong, but that even  
22 if I wanted to, that I could not because the AG's  
23 office was involved and was reviewing this and had  
24 told the City basically to stand down.

25 Q That was the chief who said that to

1     you?

2                   A       Corporation counsel and the chief.

3                   Q       Both?

4                   A       I'm sorry. In the discussion, that  
5     was the gist of the conversation.

6                   Q       Right. And I'm trying to get a little  
7     more specific, if you recall. Who was it that told  
8     you that even if you wanted to suspend the officers,  
9     you were not permitted to do so?

10                  A       I believe it was corporation counsel.

11                  Q       And did he provide his reasoning for  
12     that?

13                  A       That the Attorney General's office had  
14     told the City that they were now reviewing the case,  
15     and that we would not do anything until they were  
16     done because they didn't want anything to cloud  
17     their investigation.

18                  Q       Got it.

19                             And the chief also talked about -- or  
20     asserted that you did not have the authority to  
21     discipline the officers at this point; is that  
22     right?

23                  A       Not that I didn't have the authority,  
24     but that we could not do so because of the AG's  
25     office. But he also did not agree that the officers

1 did anything wrong here or was acting outside of the  
2 policies and procedure.

3 Q Got it.

4 What did the chief say about the City  
5 not being able to discipline the officers because of  
6 the Attorney General?

7 A He said that he had not suspended the  
8 officers back in March because when he viewed the  
9 camera, that this was a proper technique, that it  
10 was proper protocol and procedure, and that he had  
11 went through the process that -- review process, and  
12 that the AG's office was now involved, and he  
13 believed that if we suspended the officers now, that  
14 that would taint the AG's investigation.

15 Q Would it be fair to say that the  
16 discussion about the possibility of disciplining  
17 these officers was enmeshed with the discussion  
18 about the Attorney General's investigation? Is that  
19 fair?

20 A Yes.

21 Q Okay. And did anyone assert in the  
22 context of that discussion that the Attorney General  
23 office's legal authority under an executive order  
24 was relevant to whether or not you could discipline  
25 the officers in this case?

1           A       They asserted that this is why the  
2 Attorney General's office was involved.

3           Q       Okay.  And --

4           A       So --

5           Q       Sorry.  I cut you off.

6           A       So that the Attorney General was the  
7 entity that reviewed the case because the governor  
8 gave the Attorney General's office the authority;  
9 that generally these cases in the past had been  
10 reviewed by the DA's office.

11          Q       Right.  And that's helpful.

12                   Did anyone -- when you say "they  
13 asserted," you mean the chief and the corporation  
14 counsel both, right?

15          A       Specifically about the executive order  
16 and how it became to be that the AG's office was in  
17 charge was corporation counsel.  Specifically about  
18 why the DA's office wasn't handling it, I believe  
19 that that was the chief.

20          Q       Got it.

21                   And did Mr. Curtin reference Executive  
22 Order 147 specifically?  Did he use that term?

23          A       I don't believe he used "Executive  
24 Order 147," that term, but he said that the  
25 governor.

1 Q The governor.

2 And was it your -- strike that.

3 Did Mr. Curtin say to you that the  
4 fact that the Attorney General's office was  
5 investigating this matter pursuant to a governor's  
6 executive order, that that legally precluded you  
7 taking action for disciplining the officers? Or was  
8 it something else, like a request from the AG's  
9 office not to take disciplinary action at this  
10 point?

11 A It was definitive that there was  
12 nothing that I as the mayor could do.

13 Q And just to ask it the other way, at  
14 no time did Mr. Curtin say to you, This is a request  
15 or an arrangement, informal arrangement that we've  
16 made with the Attorney General's office that we're  
17 going to hold off on discipline, right?

18 A No. It was definitive that there was  
19 nothing that we could do; that the AG's office had  
20 told us that we were to basically stand down and  
21 not -- and we couldn't do anything as a city in  
22 regards to this because they were taking the lead.

23 You know, I have to say that for me  
24 this was, you know, directive coming from  
25 corporation counsel. Now, I've been sued several

1 times, or the City has been sued several times  
2 because of decisions that I have made or gone out on  
3 different cases so -- for example, with the Sippel  
4 case and other things, you know, so corporation  
5 counsel has advised in the past to be careful and  
6 cautious about, as mayor, saying and doing certain  
7 things. So when the corporation counsel made this  
8 assertion, I did not question whether that was  
9 accurate or not.

10 Q Got it.

11 You understood Mr. Curtin to be  
12 providing you with legal advice when he made those  
13 assertions, right?

14 A Yes. And also his understanding of  
15 what was told to him.

16 Q You mentioned getting sued in the  
17 Sippel case. Are you testifying that one of the  
18 reasons you did not proceed with discipline because  
19 you were concerned that you might get sued?

20 A No. I'm testifying that I did not  
21 proceed with discipline because I was told that I  
22 could not by corporation counsel because of the  
23 Attorney General's office.

24 Q Right.

25 And did Mr. Curtin remind you about

1 the Sippel case when he was describing to you the  
2 issue of whether you could proceed or not?

3 A No.

4 Q Did you have a reaction to the advice  
5 that you were given by Mr. Curtin that you could not  
6 proceed because of the Attorney General's office  
7 investigation?

8 A Yes.

9 Q What was your reaction?

10 A I was very upset. I thought that that  
11 wasn't fair. I thought that this was a very  
12 disturbing video; that we should, you know, let the  
13 public know. We should talk about this. And I  
14 thought that we should be allowed to suspend the  
15 officers, as I thought during the Christopher Pate  
16 investigation. So being told that I had to stand  
17 down was not something that I thought was right.

18 Q Did Mr. Curtin tell you by way of  
19 legal advice that you were not allowed to let the  
20 public know about the Prude mental health arrest and  
21 death because of the Attorney General's office  
22 investigation?

23 A Yes.

24 Q And he was definitive on that score,  
25 as well, right?

1           A       Yes.

2           Q       Did you ask Mr. Curtin to go back and  
3 have another look or conduct any research, legal  
4 research, to determine whether his conclusion  
5 regarding the Attorney General's office  
6 investigation was correct?

7           A       No, because he told me that he had  
8 talked directly -- or that the law department had  
9 spoken directly to the attorney general that was  
10 handling this matter, and that that was their  
11 answer, that the City could not do anything until  
12 they were done with their investigation.

13          Q       Did you ask Mr. Curtin to determine  
14 whether he could speak with someone else at the  
15 Attorney General's office, sort of higher up the  
16 hierarchical chain, to determine whether the view  
17 that had been expressed to him as he described it  
18 was correct or incorrect?

19          A       No, I did not. I accepted that the  
20 person that he had spoken to or that the law  
21 department had spoken to about this matter was the  
22 person that would make the determination.

23          Q       Did he tell you the person's name that  
24 he had spoken to?

25          A       I don't recall specifically if he said



1 the person's name, but he said that we had spoken  
2 directly to the Attorney General's office.

3 Q Did Mr. Curtin tell you the -- where  
4 in the hierarchy at the AG's office the person who  
5 the law department spoke to sat, in other words,  
6 what his or her rank was?

7 A No.

8 Q Did it occur to you that maybe you  
9 should pick up the phone and talk to somebody at the  
10 AG's office about this assertion that you were  
11 precluded from taking action because of their  
12 investigation?

13 A No, it did not. The Attorney  
14 General's office is a state agency, and based on my  
15 understanding of the law, the State precludes us --  
16 not precludes -- supersedes the City. So having a  
17 state agency give a directive about this issue and  
18 the fact that this was based on a -- you know, that  
19 it was determined from the governor through  
20 executive order that the state agency that would  
21 take this over is the AG, I did not second-guess the  
22 direction that the AG's office was now in charge.

23 Q As communicated to you by Mr. Curtin?

24 A Yes.

25 Q I want to take you back to -- let me

1 ask a couple more questions before I do that.

2 In your conversations on August 4  
3 about the Prude matter, did you discuss the issue of  
4 the fact that there was an outstanding FOIL request  
5 for body-worn camera footage from the Prude family?

6 A Yes, that the body-worn camera footage  
7 would be released and that there was an ongoing  
8 dispute between the AG's office and the City. My  
9 understanding was that the AG's office did not want  
10 the City to release the body-worn camera video, but  
11 we believed that we didn't have a legal basis for  
12 withholding it and, therefore, it would be released  
13 to the family.

14 Q Got it.

15 At any time did Mr. Curtin say to you  
16 that there had been a deal made between the AG's  
17 office and the City concerning the release of  
18 body-worn camera footage from the Prude incident?

19 A No, not that there was a deal that was  
20 made, but that the attorneys for Mr. Prude's family  
21 had been given -- or had been shown the video by the  
22 Attorney General's office.

23 Q Right. My question, though, was  
24 whether Mr. Curtin told you that there was a deal or  
25 an agreement made between the AG's office and the

1 City concerning the FOIL request.

2 A No. It was -- it wasn't characterized  
3 as that. It was just an infor -- information that  
4 the lawyers for the family had seen the video at the  
5 AG's office.

6 Q Did Mr. Curtin tell you that it would  
7 be a violation of EO 147 to release the body-worn  
8 camera footage from the Prude incident?

9 A No, that wasn't what he asserted. The  
10 basis for not releasing the video was always around  
11 the Attorney General's investigation. And not being  
12 able to say anything about this, release the video,  
13 or go public, or anything, always was predicated  
14 based on my advice received from the law department  
15 that the Attorney General's office had precluded us  
16 from doing so.

17 Q That's the advice that you've been  
18 testifying about that occurred on August 4, right?

19 A Yes.

20 Q I want to share with you what we've  
21 previously marked as Exhibit 21. This is your  
22 interview notes from the OPI investigation which  
23 were released last week. And specifically I want to  
24 take you to the top of page 18, which is Warren 198  
25 and I'm indicating with my pointer.

1                   And the OPI here writes as part of a  
2                   summary of your interview -- sorry -- quote, The  
3                   Mayor also noted that the release of the body-worn  
4                   camera footage was discussed during this meeting.  
5                   Corporation counsel Curtin explained the New York  
6                   Attorney General's office had requested that the  
7                   City not release the footage at that time as it  
8                   could impact their investigation. The Mayor  
9                   accepted corporation counsel's guidance to not  
10                  release the footage to the public at that time, but  
11                  stated that she needed to brief the city council  
12                  president about this matter.

13                   Does that reflect what you told the  
14                  OPI when you gave an interview in November of 2020?

15                  A           Yes.

16                  Q           Here you told the OPI that the  
17                  Attorney General's office had requested that you not  
18                  release footage, right?

19                  A           Yes, for -- yes.

20                  Q           And my question is, is that a complete  
21                  and accurate statement about what Mr. Curtin told  
22                  you on August 4 in light of the testimony you gave  
23                  today about what Mr. Curtin said about that date?

24                               MS. COHEN: Andy, I just would note,  
25                               as you did, that this is OPI's summary

1 of what she said.

2 MR. CELLI: Right. Which is why I  
3 asked. And I just want to make sure I'm  
4 not misunderstanding.

5 Q Did you, in fact, tell the OPI,  
6 Corporation counsel explained the New York Attorney  
7 General's office had requested that the City not  
8 release the footage at that time as it could impact  
9 the investigation?

10 MR. CELLI: And I think the Mayor said  
11 she did say that.

12 Q Am I wrong about that?

13 A The corporation counsel told us that  
14 the New York Attorney General's office said that we  
15 could not.

16 Q Right. And this has it as a request.  
17 I'm seeing that there's a difference there, but  
18 maybe there isn't. What do you think about that,  
19 Mayor Warren?

20 A It's not a distinction and a  
21 difference to me. My understanding from our  
22 corporation counsel, we were told that we could not  
23 release anything or talk about this because the  
24 Attorney General was investigating and this was  
25 their investigation.

1           Q       Well, there's nothing in the report to  
2     the -- the summary of your interview with the OPI  
3     that talks about Mr. Curtin telling you that you  
4     couldn't make public notification about the Prude  
5     incident, right? I don't see that here.

6           A       I'm sorry, I disagree. When I say  
7     that he had -- rather, you requested my  
8     understanding, was that that the directive from the  
9     Attorney General's office was that we could not  
10    release the footage because it would impact their  
11    investigation.

12          Q       Right. And I'm drawing a distinction  
13    between releasing the footage and making a public  
14    notification about the incident.

15                    Is there anything in the interview  
16    notes that reflects you haven't told them that you  
17    were told by Mr. Curtin that you were not allowed to  
18    make a -- any public notification about the Prude  
19    matter?

20                   MS. COHEN: Andy, I just have to make  
21    sure the record's clear. These are not  
22    verbatim interview notes; this is OPI's  
23    characterization of --

24                   MR. CELLI: I understand. I just want  
25    to understand what the Mayor's

1 recollection is. That's all.

2 MS. COHEN: I think she's told you a  
3 couple times now what her recollection is  
4 of what she was told. However, OPI  
5 characterized --

6 MR. CELLI: Carrie, please.

7 Can you read the question back for us,  
8 Pam? I don't want the Mayor to be  
9 confused here.

10 (Whereupon, a portion of the record  
11 was read by the reporter.)

12 MS. COHEN: Also object. These are  
13 not interview notes. This is OPI's  
14 summary of the interview.

15 THE WITNESS: OPI never asked me was I  
16 allowed to publicly speak to the matter.  
17 They only asked was I allowed to actually  
18 release the footage.

19 BY MR. CELLI:

20 Q Got it. So because they did not ask  
21 you that question, it's your belief as you sit here  
22 that you did not explain to them when you gave the  
23 interview to OPI that, in fact, Mr. Curtin had  
24 definitively said to you, no, you can't make a  
25 public notification about the Prude matter?

1           A           Mr. Curtin in the meeting explicitly  
2           stated to me that this investigation was being  
3           handled by the Attorney General's office, and that  
4           the City could not release anything that pertained  
5           to it, could not discuss it, could not do anything  
6           that would impede the Attorney General's  
7           investigation.

8           Q           Understood.

9                       Well, other than what you've already  
10          testified about, Mayor Warren, what other discussion  
11          occurred on August 4 about whether -- whether the  
12          City should notify the public about the  
13          circumstances of Mr. Prude's death?

14          A           The discussion all centered around  
15          what we were allowed to do based on what our  
16          corporation counsel believed that the Attorney  
17          General's office had instructed us.

18          Q           Did you ever ask Mr. Curtin to -- for  
19          you to have a look at the Executive Order 147?

20          A           No. The Executive Order 147 was not  
21          the basis by which we were -- that the corporation  
22          counsel told us that we could not speak to this.  
23          The Executive Order 147 was the basis by which the  
24          Attorney General was the entity that was  
25          investigating. And so once we -- once the Attorney



1 General's office, which is a state agency, my  
2 understanding supersedes anything that the City  
3 could or do [verbatim], and because of that, we had  
4 to follow the directive of the Attorney General's  
5 office.

6 Q Got it.

7 So your understanding from what  
8 Mr. Curtin said was it wasn't so much that there was  
9 an executive order that gave them the authority to  
10 do the investigation; it was that the Attorney  
11 General's office had instructed the City of  
12 Rochester not to release the body-worn camera  
13 footage and not to make public statements about the  
14 Prude matter?

15 A Yes.

16 Q In the meeting on August 4, did anyone  
17 express the view that you or your administration  
18 should nevertheless notify the public about the  
19 circumstances of Mr. Prude's death?

20 A We talked about notifying the public  
21 several times, and every time it was that we were  
22 precluded from doing so because of the Attorney  
23 General's investigation.

24 Q Understood. My question is a little  
25 bit different, which is did anybody, maybe you or

1 somebody else, in the context of those discussions  
2 say, You know what? We should just do it anyways.  
3 Regardless of what the Attorney General thinks, we  
4 should make a public statement in some way? Did  
5 anybody offer that as an opinion?

6 A I don't recall that, because the AG's  
7 office is the chief law enforcement office of the  
8 State of New York. So they are in charge, so we did  
9 not think that -- well, I didn't question their  
10 authority here, their authority to direct the City  
11 here.

12 Q All right. I appreciate the answer.  
13 I'm less interested in the motivation. I just want  
14 to know whether somebody suggested it, and it sounds  
15 like nobody did. Is that fair?

16 A Not that I recall.

17 Q Okay. When you reviewed the video on  
18 August 4, did you conclude -- I take it you  
19 concluded that Chief Singletary's description of  
20 this incident involving Mr. Prude was not accurate;  
21 is that fair?

22 A What I -- when I viewed the video,  
23 yes, it was not accurate. But the chief and I  
24 fundamentally disagree with what this video showed.

25 Q I understand. I guess now I am

1 actually asking about your subjective thinking on  
2 this. When you reviewed the video on August 4, did  
3 you feel that the chief had been deceptive in  
4 describing to you what had occurred in the Prude  
5 arrest?

6 A He did not accurately show me what I  
7 thought I saw on that video -- what I saw in that  
8 video.

9 Q Right. And I'm asking whether on that  
10 day you concluded that that was something that he  
11 did deliberately to deceive you about the  
12 circumstances of the Prude arrest.

13 A I don't know whether he did it  
14 deliberately. I just know that what I saw was not  
15 what I believed -- what I saw was different than  
16 what the chief told me.

17 Q Was there a meeting between -- on the  
18 Prude matter on August 4 after Chief Singletary left  
19 the room?

20 A There may have been.

21 Q Okay. So not drawing any distinctions  
22 about whether the chief was there or not, I just  
23 want to ask a couple questions.

24 Was there a discussion on August 4 in  
25 which you participated where the fact that the Prude

1 family had filed a Notice of Claim with the City was  
2 discussed?

3 A Yes.

4 Q And what was the discussion, as you  
5 recall it?

6 A That the Prude family was -- had also  
7 filed a Notice of Claim in that they had also  
8 requested the video.

9 Q And was there any discussion about the  
10 amount of money that the Prude family was claiming  
11 they had suffered in damages as a result of the  
12 death of Mr. Prude?

13 A I don't believe that that -- the  
14 number came up. I don't remember the number coming  
15 up, just the issue that there was a Notice of Claim  
16 that had been filed and a request for the video.

17 Q Got it.

18 You said earlier that what you  
19 understood from Mr. Curtin on August 4 was that the  
20 Attorney General's office had instructed the City  
21 not to release the body-worn camera footage, but the  
22 City of Rochester had a different view of its  
23 obligations pursuant to FOIL; is that correct?

24 A Yes.

25 Q And what was the City of Rochester's

1 view about its obligations under FOIL as expressed  
2 to you by the corporation counsel?

3 A That there was a specific law dealing  
4 with freedom of information, and that you had to --  
5 that there are specific criteria and other issues  
6 that would -- that the Freedom of Information law  
7 says that you have to comply within this particular  
8 time frame. If you're not, then you have to notify  
9 the person. And if there is no legal basis by which  
10 you have to not provide that, then you have to  
11 provide that document.

12 Q Right. And Mr. Curtin was telling you  
13 that -- was it Mr. Curtin's view, as expressed to  
14 you, that the City had an obligation under the  
15 Freedom of Information law to produce the body-worn  
16 camera footage to the family?

17 A Yes.

18 Q And did he explain to you -- and did  
19 he advise you that that's something that the City of  
20 Rochester should do?

21 A Yes.

22 Q And did you -- did you have a view  
23 based on his advice as to whether you agreed or  
24 disagreed?

25 A No. I believe that the request came

1 from the family to see the body-worn camera video,  
2 they were entitled to do so.

3 Q Okay. And --

4 A And just so I'm clear, I believe that  
5 we should always release body-worn camera video.

6 Q Right. And did it occur to you --  
7 strike that.

8 Well, did you discuss at any point in  
9 time whether there was a tension between releasing  
10 the body-worn camera video pursuant to the Freedom  
11 of Information request from the family and the  
12 Attorney General's office instruction as it was  
13 described to you that the City should take no action  
14 and stand down during the AG's investigation?

15 A What I understood was that there had  
16 been a discussion with the AG's office about the  
17 release of the body-worn camera video to the family,  
18 and that it had been determined that there was no  
19 legal basis by which the City could not comply with  
20 the release and, therefore, we would.

21 Q Uh-huh. And you would agree, though,  
22 that releasing the body-worn camera footage to the  
23 family was inconsistent with what Mr. Curtin was  
24 telling you was the instruction from the AG's  
25 office, right?

1           A       I don't understand that.  There are  
2   two separate laws here.

3           Q       Okay.

4           A       There's a Freedom of Information Law  
5   that's state law that we have to comply with, and  
6   then you have this AG's office investigation.  So  
7   releasing the video to the family is not releasing  
8   it public.

9           Q       Have you ever heard anybody say that  
10  the City of Rochester agreed to delay the release of  
11  the body-worn camera footage to the Prude family on  
12  the basis that the Attorney General's office was  
13  going to offer the family's lawyers an opportunity  
14  to view that footage in their office?

15          A       I learned that after the fact and  
16  after the deputy mayor did his report.

17          Q       Okay.  And so that's not something  
18  that Mr. Curtin told you at any time prior to  
19  September 14?

20          A       Not that I remember, no.

21          Q       Now that you understand that, do you  
22  think that -- do you think that such an agreement  
23  was, in fact, made between the City of Rochester and  
24  the AG's office?

25          A       They sent a documentation I saw that

1 was the case.

2 Q What documentation is that?

3 A There was an email between Stephanie  
4 Prince and Jenn Sommers where the AG's office  
5 acknowledged that the City should send the -- they  
6 should send the body-worn camera video over to the  
7 AG's office and the AG's office would work with the  
8 family's attorney to see the video.

9 Q And your belief as you sit here today  
10 is that that evidence is supportive of an  
11 arrangement or an agreement between the AG's office  
12 and the City of Rochester to delay the release of  
13 the body-worn camera footage directly to the family  
14 from the City?

15 A Based on the documentation that I've  
16 seen that has come to light, that it was.

17 Q Do you have any explanation for why  
18 Mr. Curtin didn't mention this arrangement to you on  
19 August 4?

20 A I can't say why, except for that his  
21 assertion that the FOIL had to be released to the  
22 family and there was no basis. But, again, I think  
23 that if I had to say what the issue is here is you  
24 have a state agency that has taken over an  
25 investigation that's been providing some directive



1 as to what they believe the City should and should  
2 not be doing at that point in time. And we're  
3 complying with those -- with that.

4 So when the City got the FOIL to  
5 release the body-worn camera video, my understanding  
6 is they contacted the AG's office to say, Hey,  
7 listen, we have this FOIL, what do you want us to do  
8 about it? And, you know, that that played into the  
9 AG's office and their authority over the  
10 investigation, and that's the basis by which this  
11 agreement came that they would view the video at the  
12 AG's office instead of actually releasing the video.

13 MR. CELLI: I think we should break  
14 here.

15 Mayor, how long would you like?

16 MS. COHEN: That's fine. Before we go  
17 off the record, can I just clarify? I  
18 just want to make sure, Andy, that what  
19 she just testified to is all about things  
20 she was told, not anything she personally  
21 knew.

22 MR. CELLI: Okay.

23 (A discussion was held off the  
24 record.)

25 (Whereupon, a recess was taken

1                   between 1:21 and 2:04 p.m.)

2       BY MR. CELLI:

3                   Q       Okay.  So we're still talking about  
4       things that happened on August 4, 2020.  And was  
5       there a discussion on August 4, 2020 between you and  
6       your advisors about whether to take disciplinary  
7       action against Chief Singletary?

8                   A       Not then.

9                   Q       Okay.  When was the first time there  
10       was a discussion about taking disciplinary action  
11       against the chief?

12                  A       The deputy mayor and I after the  
13       meeting had a discussion about it.

14                  Q       I see.  So it was August 4, but not in  
15       the meeting with the corporation counsel?

16                  A       Correct.

17                  Q       Just the two of you, you and the  
18       deputy mayor?

19                  A       Yes, I believe so.

20                  Q       Okay.  And when did this happen  
21       relative to your viewing the videotape and meeting  
22       with the chief?

23                  A       If I remember correctly, I was on the  
24       road, and both the deputy mayor and I were still  
25       very, very upset about what we saw on the video, was

1 talking about the entire meeting that had taken  
2 place, frustrated about the fact that, you know, we  
3 had been advised that there was nothing that I could  
4 do or say or -- you know, that I was just basically  
5 waiting. And so that's when, you know, we decided  
6 that we would write the letter.

7 Q Okay. And when you say "write the  
8 letter," you mean the letter to Chief Singletary?

9 A Yes.

10 Q And you say you were on the road.  
11 Were you, like, in a car going someplace and talking  
12 to the deputy mayor?

13 A Yes. My husband was driving.

14 Q I see. I know you would never drive  
15 and talk on a cell phone. That would be wrong.  
16 Neither would I.

17 And just in terms of the time of day,  
18 when was this?

19 A In the evening.

20 Q And were you headed on a family  
21 vacation? Am I right about that?

22 A Yes.

23 Q Okay. Between -- and you said that  
24 the initial meeting when you saw the video, met with  
25 the chief, that whole period of time took about an

1 hour and a half, right?

2 A I believe so. It might have been a  
3 little bit longer.

4 Q And did you leave City Hall  
5 immediately thereafter, or were you there for other  
6 matters for a while?

7 A It was at the end of the day, so I  
8 believe it was the end of the day.

9 Q I see.

10 And so you and the deputy mayor had a  
11 conversation by phone. Was that a conversation that  
12 you stimulated or that he stimulated?

13 A I don't remember.

14 Q And you say "we decided to write the  
15 letter." What do you mean by that?

16 A So we were frustrated about what had  
17 transpired in the meeting in that we were being  
18 precluded but wanted to still reiterate -- I still  
19 wanted to reiterate my frustration over how I  
20 believe the situation had been handled thus far, so  
21 decided that I would write a letter reiterating  
22 that.

23 Q Okay. And did you ask the deputy  
24 mayor to draft that letter for you?

25 A Yes.

1           Q       And what was -- did you tell him what  
2       to put in the letter?

3           A       So the deputy mayor used to be my  
4       communications director, so he sort of knows how --  
5       in general terms how I might feel, and often he  
6       would draft things for me to edit and make it in my  
7       own voice.

8           Q       Got it. And you gave that answer to  
9       the question did you ask him what to write -- did  
10      you tell him what to write, and so I guess the  
11      answer is you did not tell him exactly what to  
12      write?

13          A       No, not specifically tell him what to  
14      include, but, basically, in general terms.

15          Q       Okay. What were the general terms?

16          A       That the frustration over the  
17      handling, the fact that we saw the video  
18      differently, how we expected to proceed and what  
19      wanted [verbatim] to happen next.

20          Q       When you talk about the frustration  
21      over the handling, what are you referring to there?

22          A       That the chief and I saw this video  
23      differently.

24          Q       Was one of the things you communicated  
25      to Deputy Mayor Smith that you wanted him to put in

1 the letter was that you felt that the chief had not  
2 been fully disclosive to you when he described the  
3 Prude incident on the first occasion?

4 A I wanted him to express that we saw  
5 this video differently.

6 Q And what do you mean by that?

7 A He saw that nothing was done wrong  
8 here, and I saw that things had been done wrong.

9 Q Okay. So to ask it a different way,  
10 would you agree that you did not tell the deputy  
11 mayor to include in the letter a statement to the  
12 effect that you were upset about the fact that he  
13 had not been fully disclosive with you when he had  
14 communicated about the Prude matter prior to August  
15 4?

16 A I told him include how I felt about  
17 the situation, and that we felt very differently  
18 about what this video showed.

19 Q But not that you were upset with him  
20 for not being disclosive to you?

21 A I was upset about the whole situation.

22 Q So let's look at what we've previously  
23 marked as Exhibit 6. I'm going to take you through  
24 this in a general way, and then we'll go back to  
25 some specific things.

1                   So the first thing I want to focus you  
2                   on is what appears on Warren Exhibit 6 at Bates  
3                   ranges Warren 6 and 7. Is this the initial draft of  
4                   the letter James Smith sent to you following your  
5                   phone conversation from the road?

6                   A           Yes.

7                   Q           Okay. And the next two pages, 8 and  
8                   9, are an exchange of emails between Mr. Curtin and  
9                   you and Mr. Smith. Do you see that?

10                  A           Yes.

11                  Q           And does this appear to be a  
12                  reflection of the -- strike that. Let me ask that a  
13                  different way.

14                                What does this email show you?

15                  A           The exchange between the deputy mayor,  
16                  myself, and Tim Curtin.

17                  Q           About the draft letter, right?

18                  A           Yes.

19                  Q           And Tim Curtin added some comments to  
20                  the draft letter and they are reflected in red ink,  
21                  right?

22                  A           Yes.

23                  Q           All right.

24                  A           But I don't know if he removed  
25                  anything.

1 Q Right. That's where I'm going to.

2 So just to be fully disclosive here,  
3 so we have No. 6, and then I'm also going to show  
4 you in a moment -- how do I get the two at once --  
5 Warren Exhibit 7. And Warren Exhibit 7 goes from  
6 Bates range Warren 12 to Warren 14. And if you look  
7 on Warren 13, you'll see a letter from you to Chief  
8 Singletary at 12:11 a.m.

9 A Yes.

10 Q That's the final letter that you sent  
11 to the chief, right?

12 A Yes. That was approved by law.

13 Q By the law department?

14 A Yes.

15 Q And then the beginning of this exhibit  
16 at Warren Bates range 12 to 13, that's Chief  
17 Singletary's response to your letter from August 6,  
18 right?

19 A Yes.

20 Q Okay. So we will come back to this.  
21 But I want to go back and focus you on the initial  
22 draft -- sorry.

23 Do you have a capability, Mayor  
24 Warren, to look at things on your computer as you're  
25 with us on the Zoom?



1           A       I believe so.

2           Q       Okay. It might be helpful to you. I  
3 looked at these two documents, and I want you to  
4 have them both open, if possible, but I can't open  
5 them both myself on the screen for you. It might be  
6 helpful for you to have Warren Exhibit 7, the part  
7 that includes your letter to the chief, available to  
8 you while I ask these questions.

9           MS. COHEN: Mayor, if you need us to  
10 PDF it to you so you can pull it up on  
11 your phone, we can do that, too, if that's  
12 easier.

13           THE WITNESS: I actually have -- I  
14 think that's included in a deputy mayor  
15 thing, so I'll -- let me go through this  
16 and I'll have it.

17           Q       The final one you'll probably want to  
18 have available.

19           A       Yes.

20           Q       So focusing on what we've marked as  
21 Warren Exhibit 6, because I think you testified  
22 that's the draft that Mr. Smith sent to you on  
23 August 4, right?

24           A       Yes.

25           Q       And the subject line is, Draft letter

1 for your consideration, right?

2 A Yes.

3 Q And he starts out his draft, Chief  
4 Singletary: After meeting with you, the deputy  
5 mayor, and corporation counsel this afternoon  
6 regarding the case of Mr. Prude, I have gone from  
7 angry to outraged.

8 Is that on the draft?

9 A Yes.

10 Q Okay. And if you look at the final  
11 version of the letter that you sent to the chief,  
12 that language about having gone from angry to  
13 outraged is not present. Do you see -- do you  
14 notice that?

15 A Correct.

16 Q Did you remove that language?

17 A I believe so.

18 Q Why did you remove that language?

19 A Because I wanted to describe the  
20 outrage, and I described it in the second paragraph.

21 Q Okay. So looking again at Warren 12,  
22 which is the draft, what Mr. Smith wrote was, What I  
23 saw on video is a far cry from the incident you  
24 previously described to me verbally.

25 And you see that, right?

1           A       Yes.

2           Q       And that language does not appear in  
3 your final letter to the chief, correct?

4           A       Correct.

5           Q       And did you remove that language from  
6 the draft?

7           A       I believe so.

8           Q       Okay. Why did you do that?

9           A       Because the chief had notified me that  
10 there was an incident of the PCP arrest, and I  
11 wanted to describe what I believe was the difference  
12 between what he said to me and what actually I saw.

13          Q       Right. Well, you would agree that in  
14 the draft that Mr. Smith gave you, that line, What I  
15 saw on video is a far cry from the incident that you  
16 previously described to me verbally, that was a  
17 way -- that would communicate to the chief a concern  
18 that he had been not accurate in describing the  
19 incident to you previously as compared to what you  
20 actually saw on the video, right?

21          A       I believe that the entire letter was  
22 an indication that what the chief had described to  
23 me on the video was different than what I had saw.

24          Q       Not what he described to you in the  
25 video, but what he described to you before you saw

1 the video, right?

2 A Yes.

3 Q Okay. So if you go further down on  
4 the draft letter, Mr. Smith's draft says, I am also  
5 angered that your initial characterization of this  
6 arrest to me as a mental hygiene matter involving a  
7 suspect under the influence of the drug PCP who died  
8 in custody grossly underplayed the role of the  
9 primary officer involved in this incident.

10 Do you see that?

11 A Yes.

12 Q And that language does not appear in  
13 your letter to the chief, right, final letter?

14 A Correct.

15 Q And did you remove that language from  
16 the draft that became the final letter?

17 A I don't remember removing that.

18 Q If you look at the final letter, which  
19 is found on Warren Exhibit 7, the second paragraph  
20 starts, I understand that this arrest was a mental  
21 hygiene matter involving a man under the influence  
22 of the drug PCP who ultimately succumbed to the  
23 actions sometime after he was taken to the hospital.

24 Do you see that?

25 A Yes.

1           Q       The language there, "ultimately  
2       succumbed to the actions," is that your language or  
3       did someone else put that into the draft? I don't  
4       see it in Mr. Smith's draft.

5           A       I don't remember. And I think that  
6       that might be a typo of somebody, either me or the  
7       corporation counsel, correcting or changing -- I  
8       wanted to put the letter -- so some of this was  
9       putting it into my -- how I would say it, and so I'm  
10      not sure, because I don't -- "ultimately succumbed  
11      to actions," whose actions?

12          Q       Right. That's sort of vague, right?

13          A       Yeah. So I don't -- so, I mean, when  
14      you have three people editing a document, it  
15      sometimes gets lost.

16          Q       Uh-huh. Just to direct your  
17      attention -- maybe this will help you understand  
18      where this language came from. I don't know.

19                    If you look at Warren Exhibit 6 at the  
20      bottom of Warren 10, there is a draft -- there's an  
21      email from Mr. Smith to you, and it includes this  
22      language about someone who ultimately succumbed to  
23      the actions on the night of the arrest. Do you see  
24      that?

25          A       Yes.

1           Q       And that's actually a little bit  
2 different than what's in the final letter, because  
3 this says, Ultimately succumbed to the actions on  
4 the night of the arrest, and the final letter talks  
5 about, Ultimately succumbing to the actions sometime  
6 after he was taken to the hospital.

7           A       Yes.

8           Q       You see that, right, Mayor Warren?

9           A       Yes.

10          Q       Now, looking at that draft, that is to  
11 say that appears on Warren -- Bates range Warren 10,  
12 does that help you recall whether the language about  
13 succumbing to the actions is something that you  
14 injected into the letter, or Mr. Smith, or somebody  
15 else?

16          A       No, I'm not -- I'm not sure.

17          Q       Did Mr. Smith do one draft of the  
18 letter for you or more than one draft?

19          A       So I believe that he did -- I believe  
20 he did one draft, emailed it to me, and I made some  
21 changes to put it in my own words, and I sent it  
22 back to him and I said, you know, Send it to law to  
23 review. And that partly is because of the fact that  
24 I just wanted to make sure that I was, you know,  
25 legally correct, and because of the issues I've had

1 in the past with lawsuits and things like that, I  
2 wanted law to review.

3 Q So you recall sending him edits  
4 actually in a document on the computer as opposed to  
5 just calling him with -- verbally giving him changes  
6 that you wanted to make?

7 A I don't remember, because I was on the  
8 road, so I don't remember whether I called him or  
9 emailed it, whether I did it on my phone or not.

10 Q Okay. That's why I asked.

11 Looking at the initial draft of  
12 Mr. Smith's letter to you, it refers to -- it says,  
13 The incident took place in March. The Attorney  
14 General's office must be quite near completion of  
15 their criminal review of the matter by now.

16 Do you see that?

17 A Yes.

18 Q If you look at your final version of  
19 the letter, it does not say "quite near," it just  
20 says "must be near." Do you see that?

21 A Yes.

22 Q Is that a change that you made?

23 A I don't know.

24 Q Okay. Do you remember having a  
25 conversation about -- around this letter about how

1 long it would be before the Attorney General's  
2 office would complete its investigation?

3 A No. At the meeting on the 4th, we had  
4 surmised that because this had been going on for a  
5 while and in the AG's office, that they might be  
6 close to completion.

7 Q And did you learn anything else about  
8 that subsequently?

9 A Later, yes.

10 Q What did you learn later?

11 A That a grand jury would be impaneled.

12 Q Okay. And when did you learn that?

13 A After the Attorney General announced  
14 it.

15 Q Okay. So that wasn't something that  
16 was shared with the City of Rochester by the AG's  
17 office prior to its public announcement?

18 A It might have been shared with law,  
19 but not -- I did not receive a call from the AG to  
20 announce it.

21 Q Okay. In the initial draft that  
22 Mr. Smith did of this letter, which is Exhibit 6,  
23 third paragraph up from the bottom ends with the  
24 statement, Quite frankly, I would have expected the  
25 chief of police to have shown me this video in



1 March.

2 Do you see that?

3 A Yes.

4 Q And that's not in the final letter  
5 that you sent to Chief Singletary, right?

6 A Correct.

7 Q And is that because you removed it  
8 from the draft?

9 A I'm not sure who removed it from the  
10 draft, but the incident took place in March.

11 Q Right. I guess my question is, do you  
12 have an explanation for why your final letter does  
13 not point out to the chief that you would have  
14 expected him to -- actually, let me ask it a  
15 different way.

16 Would you agree that at this time when  
17 this letter was being drafted you were of the view  
18 that you would have expected the police chief to  
19 have shown you the video back in March?

20 A If the chief believed that there was a  
21 problem. But the chief -- yes.

22 Q And so I guess my question is, do you  
23 have any explanation of why that statement, that is  
24 to say, "I would have expected the chief of police  
25 to have shown me this video in March," why that

1 statement does not appear in the final letter that  
2 got sent over?

3 A No, I do not.

4 Q Okay. I'll also point out that in the  
5 letter from Mr. Smith of the draft that he did  
6 initially, he says -- and I'm pointing with my  
7 pointer -- that, Going forward, it would be the  
8 policy of the Rochester Police Department and the  
9 City of Rochester that any body-worn or other camera  
10 footage from an arrest or altercation with police  
11 that results in the death of an individual be  
12 reviewed by the Mayor or her designee within 24  
13 hours.

14 Do you see that?

15 A Yes.

16 Q In the final letter that went to Chief  
17 Singletary, that 24 hours is now reflected as 48  
18 hours. Do you see that?

19 A Yes.

20 Q Do you know how that change came to  
21 be?

22 A I don't know how it came to be, but I  
23 thought that in -- I can say that I thought that a  
24 48-hour window, because dependent on when it goes  
25 into the system would determine when that would be

1 available. So it takes some time to upload.

2 And to go back to your other question,  
3 on the final letter, this paragraph, I say, Had I  
4 been made aware of or seen the video footage of his  
5 actions by you or your command staff, I would have  
6 asked for this to be immediately reviewed.

7 Q Right. Right. That's helpful. Thank  
8 you.

9 In the counterpart paragraph in Deputy  
10 Mayor Smith's version, just to say, on Warren 6, the  
11 draft that he sent over says, If I had been made  
12 aware of or seen the video footage of his actions by  
13 you or the command staff, I would have asked for his  
14 suspension and termination in March.

15 Right?

16 A Correct.

17 Q And then the final letter, I think you  
18 say you would have asked that the matter be reviewed  
19 immediately.

20 A Correct.

21 Q How did that change come to be?

22 A I believe that might have been changed  
23 by law, and I think that that has to do with the  
24 lawsuit that I had with Sippel. There was an  
25 assertion in that lawsuit that I had made a

1 determination -- that I had made some assertions of  
2 guilt that I should not have.

3 Q In the draft that the deputy mayor  
4 sent over to you, in the third paragraph from the  
5 bottom he writes, On that note, I will reiterate to  
6 you that I'm greatly concerned that I was not given  
7 a clearer picture of the nature of this arrest until  
8 today when the corporation counsel showed me the  
9 body-worn camera video from the officers at the  
10 scene and also from Officer Vaughn.

11 Do you see that?

12 A Yes.

13 Q And if you look at Warren Exhibit 7,  
14 which is the final version, that paragraph begins  
15 with the statement, I'm greatly concerned that these  
16 body-worn cameras are not just viewed through the  
17 lenses of the badge, but through the eyes of the  
18 people we serve.

19 Do you see that?

20 A Yes.

21 Q Is that language about "the lenses of  
22 the badge" and "the eyes of the people we serve," is  
23 that your language or did that come from somewhere  
24 else?

25 A That came from me.

1           Q       Okay.  And did you remove the comment  
2       that Mr. Smith had included that you would be,  
3       quote, reiterating to Chief Singletary that you were  
4       concerned that you had not been given a clearer  
5       picture of the nature of the arrest?

6           A       I go on to say that in the second  
7       sentence, I was not given a clearer picture of the  
8       nature of this arrest until today when the  
9       corporation counsel showed me the body-worn camera  
10      video.

11          Q       Right.  I guess my question is, the  
12      way it was drafted by Mr. Smith, he says that that's  
13      a reiteration of something you had said previously  
14      to Chief Singletary, right?

15          A       I'm not sure.

16          Q       Okay.  Well, he says, I reiterate to  
17      you that I'm greatly concerned that I was not given  
18      a clearer picture.

19                   Does that convey to you that Mr. Smith  
20      was saying that this was something you had said to  
21      Chief Singletary during a meeting on August 4?

22                   MS. COHEN:  Andy, I think you're  
23                   asking her to answer an impossible  
24                   question which she already told you she  
25                   can't answer.

1 Q What's your best understanding of why  
2 Mr. Smith included the phrase to "reiterate to you"?

3 A I don't know.

4 Q Mr. Smith's draft at the end says  
5 that -- in your voice saying, I expect daily updates  
6 in this matter until it is resolved, right?

7 A Correct.

8 Q And at the conclusion of the final  
9 draft, it simply says, I expect to be updated on  
10 this matter.

11 Do you see that?

12 A Yes.

13 Q Did you remove the request for the  
14 updates to be daily?

15 A I don't remember.

16 Q Why did you conclude, Mayor Warren,  
17 that a letter to Chief Singletary was necessary?

18 A I was very upset about the video when  
19 I saw it. I was upset about the fact that we could  
20 not -- we were being advised by law that we were  
21 under the direction of the AG's office and couldn't  
22 do or say anything, and I wanted to be very clear  
23 with the chief about how I felt about the video and  
24 about what I saw in the video versus what he saw and  
25 what he said.

1 Q Okay. And just to go back for a  
2 second, I'm looking at Warren Exhibit 7. I'm  
3 focusing now on the first part, which is Chief  
4 Singletary's response to your email.

5 A Yes.

6 Q Did you receive that response?

7 A Yes.

8 Q And what was your reaction when you  
9 received and read that response?

10 A That these are the things that the  
11 chief did that were procedural.

12 Q And you think that the chief was  
13 responding to the concerns that you reflected in  
14 your letter to him of August 6?

15 A Yes.

16 Q Would you agree that you were  
17 satisfied with the response that he gave?

18 A This was -- yes.

19 Q So I want to now focus you on the  
20 period of between August 4, 2020 and September 2,  
21 2020 when the Prude family released the body-worn  
22 camera footage. I'm going to ask you a series of  
23 questions about that period, and I think I probably  
24 know the answer based on your prior testimony, but  
25 I'd like to ask these questions to get a clear

1 record, okay?

2 A Okay.

3 Q So in the period between August 4,  
4 2020 when you first saw the body-worn camera footage  
5 and before September 2, did you make a decision not  
6 to notify the public of the facts and circumstances  
7 of Mr. Prude's arrest and death?

8 A I did not make the decision. I was  
9 advised by corporation counsel that I could not  
10 based on the directive of the Attorney General's  
11 office.

12 Q Okay. And that was advice that you  
13 accepted, right?

14 A It was advice that I was given, yes.

15 Q Yes, it was given, and yes, it was  
16 accepted; is that fair?

17 A Yes.

18 Q Okay. And other than that advice that  
19 was given and accepted by the corporation counsel,  
20 were there any other facts that you considered in  
21 determining that you would not notify the public of  
22 the facts and circumstances of the Prude death?

23 A No.

24 Q Did the demonstrations that had  
25 occurred that summer in Rochester following the



1 death of George Floyd play any role in your decision  
2 not to notify the public of the facts and  
3 circumstances of Mr. Prude's death?

4 A No.

5 Q Did any other concerns on the part of  
6 the leadership of the RPD about the impact of  
7 disclosure on civil unrest or demonstrations play a  
8 role in your decision not to make a public statement  
9 or --

10 A No.

11 Q -- or give public notification, I  
12 should say, about the circumstances of Mr. Prude's  
13 death?

14 A No.

15 Q Did the potential exposure of the City  
16 of Rochester to civil liability to the Prude family  
17 play a role in your decision that there not be a  
18 public notification of the circumstances of  
19 Mr. Prude's death?

20 A No.

21 Q So talking about the same period,  
22 August 4 to September 2, did you reach a conclusion  
23 or make a decision not to notify the public of the  
24 fact that members of Rochester Police Department  
25 were at that point under a criminal investigation?

1           A       At the advice of my counsel, I was  
2       told that I cannot.

3           Q       Right.  And then you accepted that  
4       advice, right?

5           A       Yes.

6           Q       And did the demonstrations that  
7       occurred over that summer in Rochester in the wake  
8       of the George Floyd killing play any role in your  
9       decision not to make a public notification of the  
10      fact that there were officers of the RPD that were  
11      under criminal investigation?

12          A       No.

13          Q       What about the fact that the RPD  
14      leadership was concerned about the impact of a  
15      disclosure of a criminal investigation of police  
16      officers and civil unrest or political  
17      demonstrations in Rochester at the time?

18          A       No.  At that time I did not know that  
19      the RPD leadership had had that feeling.

20          Q       Okay.  And on August 4 did you make a  
21      decision about whether to communicate to the city  
22      council the facts and circumstances of Mr. Prude's  
23      death?

24          A       Yes.

25          Q       And what did you decide on that score?

1 A To inform the council president.

2 Q Why did you select that methodology  
3 for informing the city council?

4 A Because she's the council president  
5 and she would be who I would normally inform.

6 Q Uh-huh. So is it generally the  
7 practice, your practice as mayor, that when you want  
8 to communicate something to the council, you do so  
9 through informing the council president?

10 A Yes.

11 Q And are there circumstances as mayor  
12 where you have in the past or on other occasions  
13 communicated important information to all members of  
14 the council at the same time as opposed to just  
15 telling the council president?

16 A Generally I tell the council president  
17 first and I let her know that, and based on that  
18 discussion, we make a -- she makes a decision on how  
19 she wants council to be informed.

20 Q Uh-huh. And have you had the occasion  
21 of communicating things to the council president  
22 that you wanted to communicate to the council but  
23 you informed her were confidential in nature?

24 A Yes.

25 Q And how does that work? When you

1     notify the council president of something that is  
2     confidential in nature, what are your expectations  
3     as to whether she will communicate that to other  
4     council members or not?

5             A       I just tell her what -- that it's  
6     confidential and that's it.

7             Q       Do you -- would you expect that -- if  
8     you told the council president something and said  
9     that it was confidential, would you expect that  
10    that's something that she would share with other  
11    members of the council or not?

12            A       It depends on what she might feel  
13    about the situation.

14            Q       What do you mean by that?

15            A       Ultimately it's her call, she's the  
16    council president.

17            Q       Okay. So your view is that if there's  
18    something you wanted to communicate to council, you  
19    tell the council president and then it's up to her  
20    to decide whether to tell other people; is that  
21    fair?

22            A       Yes.

23            Q       And if you were to tell her, the  
24    council president, something and tell her that it  
25    was confidential, it would still be up to her

1       whether she wanted to keep it confidential from  
2       other members of the city council; is that fair?

3               A       Yes.

4               Q       Okay.  And so if the council president  
5       was told something by you that you said was  
6       confidential and she communicated that to other  
7       members of the council, you would have no problem  
8       with that?

9               A       No.  She's the council president.

10              Q       Okay.  No, you would not have a  
11      problem with it, just to be clear?

12              A       No, I would not have a problem with  
13      it.

14              Q       Okay.  We'll come back to this topic.

15              A       Can I make a statement there?

16              Q       Sure.

17              A       And if it was said to be confidential,  
18      we have said -- I have said, If you tell council,  
19      just let them know that it's confidential.

20              Q       Okay.  I think we've established at  
21      this point that you learned on September 2 that the  
22      Prude family, through their lawyers, had released  
23      the body-worn camera footage of the Prude mental  
24      health arrest, right?

25              A       Yes.

1           Q       Were you aware prior to September 2  
2       that the body-worn camera footage had been sent over  
3       to the Prude family's lawyers?

4           A       Between August 4 and September 2?

5           Q       Yes.

6           A       Yes.

7           Q       And how did you learn that?

8           A       Corporation counsel notified me when  
9       he was going to -- that he had sent it over.

10          Q       Okay. And what were the -- how did he  
11       do that? What were the circumstances?

12          A       I believe it was a phone call to say  
13       that the body-worn camera video had been released to  
14       the family.

15          Q       And what was your reaction to that  
16       information?

17          A       Okay.

18          Q       Okay. Did Mr. Curtin tell you that  
19       the body-worn camera footage had been mailed out to  
20       the lawyers for the Prude family, but that he had  
21       not been informed that it had been mailed out?

22          A       That who had not been informed?

23          Q       Yeah, it was not a well-put question.

24                    Did Tim Curtin tell you that when the  
25       body-worn camera footage was mailed to the family,

1 the Prude family's lawyer, that he had not been  
2 informed before it went out that, in fact, the  
3 footage had been mailed to the family?

4 A I was just told that the footage had  
5 been released to the family.

6 Q Okay. So he didn't tell you that it  
7 went out without his knowledge; is that correct?

8 A Not that I recall, no.

9 Q Okay. If I told you that the  
10 body-worn camera footage was mailed out to the Prude  
11 family lawyer on August 12, could you tell me when  
12 you believed -- when you believe you were notified  
13 that that had happened?

14 A I believe on the same day.

15 Q Okay. When you learned that the  
16 body-worn camera footage had gone to the family, did  
17 you believe it was likely that the family or its  
18 lawyers would release some or all of this to the  
19 media?

20 A Yes.

21 Q And did you take any steps as a result  
22 of that conclusion?

23 A "Steps" meaning --

24 Q Did you do anything? Did you take any  
25 action as a result of having that understanding in

1 your mind that it was likely to be released?

2 A All of us knew, so -- that the video  
3 camera -- that the body-worn camera had been  
4 released, so no.

5 Q When you say "all of us," who do you  
6 mean?

7 A So I believe that corporation counsel  
8 knew, the chief knew, the deputy mayor knew, the  
9 communications director, I believe, also knew.

10 Q How do you know the chief knew that  
11 the body-worn camera footage had been mailed back to  
12 the family?

13 A Because it was already established  
14 that it would be.

15 Q What do you mean by that?

16 A On August 4, that was part of the  
17 discussion, that the body-worn -- there was no  
18 reason to hold the body-worn camera back legally  
19 based on what the Attorney General's office had  
20 said, so that the family would be getting the video  
21 within the next week or so.

22 Q Got it.

23 A Common knowledge.

24 Q And that was something that was  
25 expressed in front of the chief?



1           A       I believe so.

2           Q       And other than that conversation on  
3 August 4 that you just testified about, are you  
4 aware of the chief, deputy mayor, or Mr. Roj having  
5 been given a specific notification like the one you  
6 received that said the footage is now being mailed  
7 to the family?

8           A       I don't know.

9           Q       Were there any planning or steps that  
10 are taken by your administration to prepare for the  
11 fact that, from your point of view, it was likely  
12 that footage from the body-worn camera collection  
13 would be -- likely be publicly released after the  
14 family got it?

15          A       No.

16          Q       Was there any planning about how this  
17 would be dealt with from a public relations  
18 perspective or press perspective, or whether it  
19 might have an impact on policing activities, on  
20 demonstrations in the town, any of those things?

21          A       No, because we had been dealing with  
22 demonstrations all summer long, so it wouldn't be  
23 anything different than what we had been dealing  
24 with.

25          Q       Okay. After the body-worn camera

1 footage was mailed to the Prude family lawyers and  
2 before it became public on September 2, did you ever  
3 discuss with Chief Singletary or anybody from the  
4 department the fact that it had gone to the family?

5 A I don't remember.

6 Q During that same period, did you  
7 discuss that issue with the deputy mayor?

8 A I don't even remember.

9 Q How about Mr. Roj, did you, during  
10 that period, discuss the fact that the body-worn  
11 camera footage had been mailed out to the family?

12 A No, I don't remember.

13 Q Okay. Were you at all concerned,  
14 Mayor Warren, that the release of the body-worn  
15 camera footage to the media could inflame the  
16 demonstrators or people who were in the streets in  
17 Rochester at this period of time?

18 A I knew that people would be upset just  
19 as I had been upset.

20 Q And did that cause you to take any  
21 steps or do anything differently than you would have  
22 otherwise done?

23 A We were already dealing with protests,  
24 so we would deal with the protests the same way, and  
25 we would answer the media questions when they came.

1       However, my understanding was that, you know, even  
2       in that case, we would have to be very careful  
3       because of the AG's investigation.

4               Q       And where did you get that  
5       understanding?

6               A       Based on what corporation counsel had  
7       said on August 4.

8               Q       Okay. Did you notify or direct that  
9       anybody notify the Attorney General's office that  
10       this material had been sent over to the family?

11              A       The Attorney -- I believe that the  
12       Attorney General's office knew, or I was told that  
13       they knew because the corporation counsel had been  
14       going back and forth about the FOIL on the video,  
15       and I know -- I had been told by corporation counsel  
16       that the AG's office had been notified that there  
17       was no basis legally for them to withhold it.

18              Q       Got it.

19                     My question is a little bit different,  
20       which is did you direct anybody or did you yourself  
21       contact anybody at the Attorney General's office to  
22       let them know that the material had been sent over  
23       to the family?

24              A       Not at that time, no.

25              Q       At some other time did you?

1           A       I spoke to the Attorney General when  
2 the body camera video was released.

3           Q       And that would have been on September  
4 2 or on some date subsequent to that?

5           A       September 2.

6           Q       And what was your conversation with  
7 the Attorney General on September 2?

8           A       That the body-worn camera video in  
9 this case had been released and that I was going to  
10 make a statement about the -- you know, the fact  
11 that the AG's office was reviewing it and I wanted  
12 her to be aware.

13          Q       Okay. Was that a call that you made  
14 to Attorney General James or she made to you?

15          A       I made it to her.

16          Q       And you spoke to her directly, right?

17          A       Yes.

18          Q       And what did she say in response to  
19 your statement?

20          A       She said okay, she took down the  
21 information of the case, and said that she would let  
22 her office -- the person in her office that was  
23 handling it know, and thank you for calling her.

24          Q       Did the Attorney General say to you  
25 anything to the effect of, You really shouldn't be

1 making any comments of an investigation that our  
2 office is conducting?

3 A No, not at that time, no. No.

4 Q Did she make a comment like that to  
5 you at any time?

6 A No.

7 Q Okay. Prior to -- well, between  
8 August 4 and September 2, had you prepared public  
9 remarks that you would give in the event that the  
10 Prude body-worn camera footage were made public in  
11 the media?

12 A No.

13 Q Did there come a time when you spoke  
14 to Council President Loretta Scott about the Prude  
15 matter?

16 A Yes.

17 Q And that was sometime between August 4  
18 and September 2; is that correct?

19 A Yes.

20 Q And what occurred in that  
21 conversation? First of all, was that face to face,  
22 on the phone, or some other way?

23 A On the phone. I was out of town.

24 Q Okay. Do you remember the date?

25 A It was I believe around August 5 or

1 August 6. I had went back and looked at my cell  
2 phone records on this, and I think it was August 6,  
3 if I recall.

4 Q Okay. And were you on vacation with  
5 your family at that point?

6 A Yes.

7 Q Okay. And did you notice when you  
8 looked at your cell phone records how long your call  
9 was with council president that day?

10 A I believe it was between five and 10  
11 minutes.

12 Q Okay. And what do you recall about  
13 that call?

14 A I was calling to inform her that I had  
15 seen a disturbing video. I explained to her what I  
16 had saw on the video. I told her that the video was  
17 really bad. I told her that the ME's office had  
18 determined that it had been a homicide by  
19 asphyxiation, excited delirium, as well as PCP, and  
20 that all three concerns were contributing factors to  
21 the death; that the chief had told me that the  
22 techniques and all the things -- the techniques  
23 were in -- aligned with policy and procedure; and  
24 that, you know, that was his belief, but that the  
25 video, the antagonizing, the -- I described the

1 sound that -- the phrase "scoop crazy, scoop crazy,"  
2 that kept -- Officer Vaughn kept saying over and  
3 over again, the fact that I felt that this was, you  
4 know, a very disturbing video; and that this was now  
5 in the AG's office; and that we were told by -- that  
6 I had been told by corporation counsel that we could  
7 not say anything; that we could not release the  
8 video; that we could not do anything until the  
9 Attorney General's office was done.

10 Q Okay.

11 A I also told her that we -- that the  
12 family had filed a Notice of Claim as well as wanted  
13 the video.

14 Q So I appreciate that answer,  
15 especially the last part, because I was going to ask  
16 you, are you clear in your mind that you had this  
17 conversation with President Scott before the  
18 body-worn camera video was released to the family?

19 A Yes.

20 Q Okay. So you've now told us what you  
21 said during the call. Now tell me what she said  
22 during the call.

23 A She asked a couple questions about the  
24 video and in comparison to the Christopher Pate  
25 video, and I said that it was bad. And, you know,

1 she said, you know, So we can't say anything about  
2 this? And I said, No, this is confidential. That's  
3 what I'm being told by corporation counsel, because  
4 this is under review by the Attorney General's  
5 office.

6 Q Okay. Anything else you recall her  
7 saying?

8 A No.

9 Q Did you discuss any other topics in  
10 the call that you had with Council Member Scott --  
11 Council President Scott?

12 A I believe so, yes.

13 Q What were the other topics?

14 A I really don't remember.

15 Q Okay.

16 A That we talked about maybe one or two  
17 other things.

18 Q Okay. When you reached Council Member  
19 Scott, do you remember the time of day?

20 A I believe it was around 2:00 or 3:00  
21 in the afternoon.

22 Q Okay. Did she appear to be awake and  
23 alert when you spoke to her?

24 A I don't know. I do know that the --  
25 can we go off the record for a second?



1 MS. COHEN: Can we just take a quick  
2 break, perhaps?

3 MR. CELLI: Why don't we take a quick  
4 break and you guys talk and then I'll come  
5 back.

6 MS. COHEN: Great. I also wouldn't  
7 mind grabbing a cup of coffee, so let's  
8 take five minutes.

9 MR. CELLI: Let's take five.

10 (A discussion was held off the  
11 record.)

12 BY MR. CELLI:

13 Q So before the break we were talking  
14 about your conversation with President Scott about  
15 the Prude matter and other things, and I asked and  
16 you didn't get a chance to answer, so I'll just ask  
17 it again: When you spoke to President Scott that  
18 day, did you find her to be awake and alert?

19 A Yes.

20 Q Did she appear to be her usual self  
21 when you talked to her?

22 A Yes.

23 Q Okay. She didn't appear to be  
24 confused or disoriented when you spoke to her?

25 A Not that I could tell, no.

1           Q       And you know that she has a different  
2       recollection of that phone conversation, right?

3           A       Yes.

4           Q       Do you have any explanation for that?

5           A       What do you mean?

6           Q       I mean, obviously, people do remember  
7       things differently, and that may be one explanation.  
8       But are you aware of any other explanation for why  
9       she has a different recollection of that call from  
10      you?

11          A       I know that over the last year she has  
12      been experiencing some health challenges, so it's  
13      possible that that could have contributed to the  
14      difference.

15          Q       Right. I guess that's what I wanted  
16      to ask about. To your knowledge, was President  
17      Scott experiencing a health condition on the day you  
18      spoke to her such that it would interfere with her  
19      recollection of events?

20          A       Not to my knowledge.

21          Q       I'm going to now go to what we  
22      previously marked as Exhibit 23R. I'll screen share  
23      this with you. Actually, let me do one other thing  
24      before that.

25                   This is what we marked in advance as

1 Exhibit 25, if I can get it open.

2 Mayor Warren, do you see this text  
3 exchange?

4 A Yes.

5 Q Is this a text exchange between you  
6 and Council President Scott?

7 A Yes.

8 Q And this came in to you -- there's a  
9 statement here, I thought you asked me not to share  
10 the news about the person who died in custody. Did  
11 I understand, question mark.

12 That's Council President Scott  
13 communicating to you, right?

14 A Yes.

15 Q And that's at 10:00 -- 10:11 in the  
16 morning on Wednesday, September 2, right?

17 A Yes.

18 Q Do you know what stimulated that  
19 message from her?

20 A It was the family's release of the  
21 body-worn camera video, and that council was upset  
22 that they did not know about it. And when her chief  
23 of staff had asked my chief of staff about what was  
24 going on, I gave a quick response when I was in the  
25 middle of something just saying I had spoken to

1 Loretta about this, and this was the case where the  
2 gentleman that was on PCP had been restrained and  
3 had excited delirium, that this was that case.

4 Q Got it.

5 And this message that we've marked as  
6 Warren 25, was this exchange an exchange that took  
7 place on your personal cell phone?

8 A Yes.

9 Q Okay. And do you know -- and you may  
10 very well not know, but do you know why this  
11 exchange was only produced to us yesterday as  
12 opposed to when we got the other material from you,  
13 which was a few weeks back?

14 MS. COHEN: So, Andy, I will proffer  
15 you that this did not hit on the search  
16 terms used by the forensic term -- or the  
17 forensic firm. Not "term."

18 MR. CELLI: Got it. In that case I  
19 don't need to ask the Mayor that question.  
20 Thank you.

21 Q When Council President Scott texted  
22 you on the 2nd and said, I thought you asked me not  
23 to share the news about the person who died in  
24 custody. Did I understand? Your response was, I  
25 don't remember but I may have, right?

1 A Correct.

2 Q And that's -- you were telling the  
3 truth when you said that, right?

4 A Yes.

5 Q And you said we talked about so much  
6 that day, what were you referring to there?

7 A Because I know that we just didn't  
8 talk about the Daniel Prude incident; we talked  
9 about other things that day. So in a 10-minute  
10 discussion, a five-to-10-minute discussion, it was  
11 other things that we talked about.

12 Q Got it. Okay. And as you sit here  
13 today, you just don't recall what those other things  
14 were?

15 A No.

16 Q Okay. Now I want to take you to what  
17 we previously marked as Warren Exhibit 23R. This is  
18 the compendium of your text messages.

19 And just to situate you, you see here  
20 on page LW273-R2 there's a text exchange where the  
21 message is, Daniel Prude death in the media. We  
22 should discuss.

23 Do you see that?

24 A Yes.

25 Q And am I getting this right, was the

1 sender on that Mr. Curtin?

2 A I'm not sure. I don't know the  
3 number. I don't know his number by heart.

4 Q Right. And that number that ends in  
5 [REDACTED] that's your private phone number, right?

6 A Yes.

7 Q And just looking on my other version  
8 here to see what it says.

9 Do you recall learning that the Daniel  
10 Prude death had been released to the media in the  
11 early morning of September 2?

12 A Yes.

13 Q And do you think you learned that by  
14 virtue of somebody sending you a text message?

15 A Yes.

16 Q Was this the text message that  
17 notified you or was there a different one?

18 A I believe that it was a text message  
19 and a phone call about the press conference.

20 Q And who -- who sent you the text  
21 message and who made the phone call to you?

22 A I don't know who sent this text  
23 message; I don't know that number by heart. So --  
24 and I believe that I might have received a phone  
25 call from the communications director.

1 Q That's Mr. Roj?

2 A Yes.

3 Q So I'm going to direct your attention  
4 to this text message exchange, September 2 at  
5 9:26:39 a.m., where the message says, BJ wants to  
6 know if there's anything he can share with counsel  
7 about 11:00 a.m. presser.

8 Do you see that?

9 A Yes.

10 Q And had you been planning to have a  
11 11:00 a.m. news conference on September 2?

12 A No. This, I believe, was the Prude  
13 family's presser. They had released that they were  
14 going to have the press event that morning.

15 Q Got it.

16 A I believe that the D&C had been  
17 reporting it, and I had -- the D&C had been  
18 reporting it, and that's when I, if you look at  
19 9:34, respond back -- not -- yeah, 9:34 I respond  
20 back to Alex saying, Tell them that this is a case  
21 that I spoke to Loretta about, and the guy that --  
22 PCP, naked in the middle of Jefferson Avenue,  
23 complied with the police, and while waiting for an  
24 ambulance was spitting, they put a spit sock on, he  
25 tried to get up, one officer restrained him from

1 getting up, ended up throwing up and losing  
2 consciousness. They took him to the hospital. He  
3 later died. All things were contributing factors.

4 And after that text to BJ is when I  
5 received the text from Loretta saying, Did I say not  
6 to say anything?

7 Q Got it.

8 When you said the text to BJ, were you  
9 referring to the text message on September 2 at 9:26  
10 that begins, BJ wants to know?

11 A No. I'm sorry. That was the first  
12 text that I received from Alex. I didn't text BJ  
13 back. I text Alex back that response.

14 Q Right.

15 A And Alex then -- my understanding is  
16 Alex then text BJ.

17 Q So going back to the text exchange  
18 with President Scott, did you have a conversation  
19 with her that day in the wake of her question to you  
20 by text about the Daniel Prude matter?

21 A Yes. We had a briefing with council  
22 later that day.

23 Q Did you have a one-on-one conversation  
24 with her at any point that day?

25 A I don't remember. I don't think so.



1 Q You don't think so. Okay.

2 I want to direct your attention a  
3 little further down the page. This is LW274-R2.  
4 This is a text message September 2, 9:35 a.m., and  
5 this is from Council Member -- Vice President, I  
6 should say, Willie Lightfoot to you, right?

7 A Yes.

8 Q And he's forwarding you a  
9 Democrat & Chronicle news story: Daniel Prude,  
10 Rochester, New York police officers forcibly  
11 restrained Chicago man who died.

12 Do you see that?

13 A Yes.

14 Q And you responded to Vice President  
15 Lightfoot about a minute or so later at the top of  
16 the next page of the exhibit, quote, I talked to the  
17 council president about this and I believe the chief  
18 told you in March about the guy high off of PCP that  
19 ended up dying a week later.

20 Do you see that?

21 A Yes.

22 Q What are you referring to when you  
23 say, I believe the chief told you in March about the  
24 guy high off PCP that ended up dying a week later?

25 A Because all of our senior management

1 team people have meetings with the leaders of their  
2 division, and so I just assumed, and I assumed  
3 wrong.

4 Q Got it.

5 So as you sit here today, you don't  
6 have any information that Vice President Lightfoot  
7 was informed of the Prude arrest in March, correct?

8 A Correct, he was not. To my  
9 understanding he was not.

10 Q And how did you learn that you were  
11 wrong about that?

12 A Because he told me that he knew  
13 nothing about it, and in that meeting he was very  
14 upset about everything because he's the chair of  
15 public safety, and having regular meetings with the  
16 leader of the department, these are issues that  
17 generally are shared.

18 Q Did he respond to -- Council Vice  
19 President Lightfoot respond to your 9:36 text  
20 message with a text message back?

21 A I don't remember. I don't remember.

22 Q Okay. So you spoke to the press on  
23 September 2 about the Prude matter, right?

24 A Yes.

25 Q I'm going to show you what we've

1 previously marked as Warren Exhibit 8 and ask a few  
2 questions about that.

3 This is a transcript we had prepared  
4 from a video of your September 2 press conference.  
5 I'm going to start by directing your attention to --  
6 really to a sentence beginning on page 2, line 15.  
7 I want this community to know that at no point in  
8 time did the chief or I not do everything possible  
9 to make sure that this case was being handled  
10 according to the way it's outlined by Executive  
11 Order 147.

12 And then you go on to describe  
13 Executive Order 147. And we'll talk about that.

14 Had you reviewed Executive Order 147  
15 before you gave this press conference?

16 A Yes. And also talked to our  
17 corporation counsel.

18 Q When was the first time you reviewed  
19 the executive order itself?

20 A I believe the date of the press  
21 conference.

22 Q And you also spoke to corporation  
23 counsel about Executive Order 147 that day?

24 A Yes.

25 Q What did he say to you and what did

1 you say to him?

2 A That this was the basis by which the  
3 AG's office was legally the agency that handled the  
4 case.

5 Q Okay. When you reviewed Executive  
6 Order 147 -- and I can put it in front of you if  
7 that would help -- did you see anything in it that  
8 led you to the conclusion that the fact that the  
9 Attorney General's office had jurisdiction over a  
10 particular matter under the executive order, that  
11 that precluded the City of Rochester from making a  
12 public notification about the existence of that  
13 matter?

14 A Can you clarify the question?

15 Q Sure. You know what? Why don't we  
16 just do it a different -- a slightly different way.

17 When you spoke to the press on the 2nd  
18 of September, one of the things that you talked  
19 about -- I'm going to take you to page 4 now -- at  
20 the top of 4 on this exhibit you say, In this  
21 particular instance, this is not within our control.  
22 It's not within our control fairly, because the  
23 executive order outlines that this case has to be  
24 handled by the Attorney General's office. I've been  
25 in contact with the Attorney General's office and I

1 know that she's in contact with her team about  
2 moving this investigation along.

3 Okay. First of all, when you say  
4 you've been in contact with the Attorney General's  
5 office, is that the call you described earlier with  
6 Letitia James?

7 A Yes.

8 Q You say, I want everyone to understand  
9 and be very clear that at no point in time did we  
10 feel this was something we did not want to disclose.  
11 It is always something that we want to be  
12 forthright, up front about with our citizens.

13 And then you go on. And then it picks  
14 up on line 19, In this particular case, this is  
15 handled by another agency and we are precluded from  
16 getting involved in it until the agency has  
17 completed their investigation. Unfortunately, it's  
18 now September 2 and we still do not have a report  
19 from the AG's office.

20 Did you intend to communicate in this  
21 passage that the executive order precluded the City  
22 of Rochester from making a public notification of  
23 the Prude arrest and death?

24 A No. It was that the AG's office was  
25 handling the case and that was what precluded us

1 from doing so.

2 Q I see.

3 When you made this statement, did you  
4 believe that Executive Order 147 legally precluded  
5 the City from commenting publicly about the Prude  
6 matter?

7 A Based on my understanding, the  
8 executive order gave jurisdiction to the AG's  
9 office. My understanding from corporation counsel,  
10 let me say that, that the executive order gave  
11 jurisdiction over the case to the Attorney General's  
12 office, and, therefore, the Attorney General's  
13 office was to be the agency that handled everything,  
14 including notification to the public.

15 Q I guess -- I understand your answer,  
16 but my question's a little bit different, which is  
17 whether you understood the executive order to  
18 preclude legally the City of Rochester from itself  
19 notifying the public of the circumstances of  
20 Mr. Prude's death.

21 A I guess --

22 MS. COHEN: I don't think anyone wants  
23 you to guess, Mayor.

24 A I'm not saying I guess. I'm saying  
25 that executive order gave jurisdiction to the AG's

1 office.

2 Q I got that part. I'm interested in  
3 the other side of the coin, which is what did you  
4 understand the executive order --

5 A So --

6 Q -- to preclude the City from doing?

7 A I'm sorry for interrupting you.

8 Q No. I just wanted to make sure you  
9 understood my question, because I've asked it and  
10 you say, Well, it gave jurisdiction to the Attorney  
11 General's office. And I'm asking sort of the other  
12 side of the coin, if you will, which is what did you  
13 understand the legal effect of the executive order  
14 was on the City of Rochester's ability to publicly  
15 notify people about the circumstances of the Prude  
16 arrest.

17 A I believe that the -- as I said, the  
18 executive order gave jurisdiction to the AG's office  
19 and outlined how the AG -- how the AG's office would  
20 handle the case.

21 Q Did you understand when you gave these  
22 public statements on September 2 that the fact that  
23 the Attorney General's office had been given  
24 jurisdiction over the case legally precluded  
25 Rochester from making a public statement about it?

1           A           I understand from other corporation  
2           counsel that the AG's office had jurisdiction and,  
3           therefore, they had instructed us not to say  
4           anything or do anything with this case until they  
5           were finished with their investigation, according to  
6           our corporation counsel.

7           Q           So at the bottom of page 4, picking up  
8           again, line 19, you say, In this particular case,  
9           this is handled by another agency and we are  
10          precluded from getting involved in it until that  
11          agency has completed their investigation.  
12          Unfortunately, it is now September 2 and we still do  
13          not have a report from the AG's office. I know that  
14          they are working on it and I know that our law  
15          department and our police department have been  
16          working with them to move this along. As soon as --  
17          and as soon as -- as soon as we are allowed to get  
18          involved or to move this forward, we will do our  
19          investigation. But the law at this point in time  
20          precludes us from doing so.

21                        Do you see that?

22          A           Yes.

23          Q           And I want to understand what you were  
24          trying to communicate with that last line, I wanted  
25          to give you the context, "but the law at this point



1 precludes us from doing so."

2 A The AG's office is the entity that is  
3 handling the investigation and, therefore, they have  
4 superseded jurisdiction over the City of Rochester,  
5 and we are guided by them.

6 Q Right. But what specifically, if  
7 anything, were you saying that the law precluded the  
8 City of Rochester from doing?

9 A From discussing the case.

10 Q Okay.

11 A Based on my understanding from  
12 corporation counsel.

13 Q Let me take this one down for a moment  
14 and share with you Executive Law 47 -- Executive  
15 Order 147. It's kind of small.

16 MR. CELLI: You guys should have a  
17 copy of this. I can't even make it, for  
18 whatever reason, two pages on one screen.

19 Q Do you have this in front of you,  
20 Mayor?

21 A Yes.

22 Q Okay. Is there something in this  
23 executive order that you believe legally  
24 precludes -- precluded the City of Rochester from  
25 making public notification about the Prude matter?

1           A           Based on my corporation counsel's  
2           advice, the executive order gave jurisdiction to the  
3           Attorney General's office, and it goes through and  
4           talks about what the Attorney General's office would  
5           be doing in this particular case, in cases like  
6           this, and, therefore, the Attorney General's office  
7           had authority over this -- these matters. Their  
8           authority superseded the City's.

9           Q           I understand that that's based on what  
10          your corporation counsel told you. I'm asking you a  
11          slightly different question, which is, having  
12          reviewed Executive Order 147, can you point me to  
13          the part of the executive order that you think  
14          precludes the City of Rochester from making a public  
15          notification about the Prude matter?

16                   MS. COHEN: That's not what her  
17                   testimony was, Andy.

18                   MR. CELLI: Well, okay.

19          Q           If I'm misunderstanding, correct me.  
20                   Is it correct that you believe or that  
21          you believed on September 2 that Executive Order 147  
22          legally precluded the City of Rochester from making  
23          a public notification about the Prude matter?

24          A           That was information that was provided  
25          to me by my legal counsel.

1           Q       Right.  And you also reviewed the  
2       executive order, right?

3           A       Yes.

4           Q       Okay.  And is there -- can you point  
5       me to something in the executive order that led you  
6       to that conclusion?

7           A       When the executive order gives  
8       authority to the Attorney General's office, the  
9       Attorney General's office supersedes the State --  
10      the State of New York supersedes the City, and so  
11      the very nature of that case, of this particular  
12      case going to the Attorney General's office, is --  
13      and the executive order outlines the Attorney  
14      General's powers in this -- that, to me, supersedes  
15      anything that the City could do.  And based on the  
16      discussion that I had with corporation counsel about  
17      what the AG's office had already informed us, there  
18      was nothing that -- we were precluded from doing so.

19          Q       However, once the body-worn camera  
20      material was released to the media, you did give  
21      public statements about the Prude matter, right?  
22      That's one of the things that you were doing on  
23      September 2, right?

24          A       After I had spoken with the Attorney  
25      General.

1 Q And did you ask the Attorney General's  
2 permission to give a public statement?

3 A I told her that I was going to give a  
4 public statement and she did not tell me that I  
5 could not.

6 Q Okay. So you took that as her  
7 permitting you to deviate from Executive Order 147?

8 A Not permitting me to deviate, but that  
9 it was okay to talk in general terms, but not  
10 specifically. And because the City did not release  
11 the camera -- the body-worn camera video, the family  
12 did, that there was no violation on our part and our  
13 directive that we understood from -- that I  
14 understood from the law department.

15 Q I'm going to take you back, Mayor  
16 Warren, to Exhibit 8 and ask you a couple questions  
17 about that. I guess I'm not sharing yet. Hold on,  
18 I will share.

19 So you'll notice here at line 7 on  
20 page 8, we have Chief Singletary beginning his  
21 remarks. Do you see that?

22 A Yes.

23 Q And what Chief Singletary says at line  
24 16 is, So that morning of the incident I ordered a  
25 criminal investigation conducted by our Major Crimes

1 Unit as well as an internal investigation conducted  
2 by our Professional Standards Section.

3 Do you see that?

4 A Yes.

5 Q Is this the first time you were aware  
6 that there had been a criminal investigation ordered  
7 by Chief Singletary?

8 A Yes, that I recall. I just remember  
9 the PSS investigation.

10 Q Right. And so we're going to stick  
11 with Chief Singletary's comments for a bit.

12 Taking you over to page 7, picking up  
13 again here on line 16, he says, And that morning I  
14 ordered an internal investigation and a criminal  
15 investigation, as well, and I have been in constant  
16 contact with the AG's office regarding this  
17 investigation.

18 Do you see that?

19 A Yes.

20 Q What information do you have about  
21 contacts between Chief Singletary and the Attorney  
22 General's office regarding the Prude matter?

23 A At that point in time I had none.

24 Q I'm saying as you sit here today.

25 A Oh. That there was the back and forth

1 regarding the video and everything that the deputy  
2 mayor had reported on, and also inquiring about  
3 where they were with the investigation.

4 Q And there's a question here at the  
5 bottom of page 7, line 23, Unidentified Male, I  
6 presume that's a reporter who asked the question:  
7 Why did the department not make known what had  
8 happened at the time it happened or when you  
9 concluded your own investigation? There's nothing  
10 about the Attorney General's function that precludes  
11 that. Almost all the cases they look into are, in  
12 fact, known publicly. So why did you not say  
13 something?

14 And Chief Singletary's response was,  
15 So, I mean, as far as our protocol, we won't want to  
16 do anything to taint any kind of investigation  
17 whatsoever, whether it be a criminal investigation  
18 or an internal investigation. That is a protocol  
19 that we follow within our department.

20 Do you know what Chief Singletary was  
21 referring to there in terms of a protocol?

22 A How they handle their investigation.

23 Q Are you aware of a specific protocol  
24 about public commentary concerning investigations by  
25 the Major Crimes Unit or the Professional Standards

1 Section?

2 A Generally my understanding is when a  
3 matter is being reviewed by the District Attorney's  
4 office, we would state such; we would not  
5 necessarily go into details about everything, but we  
6 would notify and state such.

7 Q Right.

8 So when Chief Singletary says that  
9 there was a protocol within the department that  
10 precluded the department mentioning the fact that  
11 this arrest had occurred, was that incorrect? As  
12 you sit here now. I won't talk about what you  
13 thought then, but as you sit here now you would  
14 agree that's incorrect?

15 A Based on past practice, yes.

16 Q Okay. And when you heard the chief  
17 say this in the moment on September 2, did you  
18 conclude that he made an incorrect statement?

19 A I don't remember him making the  
20 statement.

21 Q Okay. What was your reaction -- I  
22 just want to focus you on page 8, line 1, the chief  
23 was asked, What was the cause of Prude's death? Was  
24 it homicide? And Chief Singletary responds, I can't  
25 get into specifics with regard to that. Obviously

1 there's still an ongoing investigation. There is  
2 the internal and criminal, as well as I understand  
3 there's a possible lawsuit regarding this case as  
4 well.

5 How did you react when Chief  
6 Singletary declined to answer the question of  
7 whether Mr. Prude's death was a homicide?

8 A I did not react.

9 Q Okay. Did you think it was proper,  
10 improper, or did you have no opinion about him  
11 declining to answer that simple question?

12 A I believe it was public information  
13 that -- what the ME's office had determined at that  
14 point.

15 Q And what's that belief based on?

16 A I believe that the family had released  
17 the cause of death from the ME's office.

18 Q Did you think it was kind of odd that  
19 the chief was declining to even confirm that fact?

20 A I don't know.

21 Q Did you talk to him about that  
22 afterwards?

23 A No, I did not.

24 Q As of September 2, was there an  
25 internal PSS investigation going on with respect to



1 the Prude matter?

2 A My understanding was that the internal  
3 PSS investigation had been put on hold until after  
4 the AG's office comes back with their determination  
5 because we couldn't compel the officers to testify,  
6 that -- that's my understanding of the process.

7 Q Well, do you think it was correct or  
8 incorrect when Chief Singletary said that there's  
9 still an ongoing investigation, there is an internal  
10 and criminal as well as a possible lawsuit regarding  
11 this case, suggesting that there was at that point  
12 an ongoing internal investigation?

13 A I think that part of it was correct,  
14 because the PSS investigation is still open, it's  
15 not closed, but -- however, I believe that the Major  
16 Crimes -- I learned later that the Major Crimes  
17 bureau had concluded their investigation.

18 Q Would you be surprised to learn, Mayor  
19 Warren, that the Professional Standards Section  
20 concluded their investigation of this matter within  
21 days of the death of Mr. Prude?

22 A Yes.

23 Q As of September 2 were you aware that  
24 the law department had initiated discussions with  
25 the family of Mr. Prude?

1           A       As of September 2?

2           Q       Yes.

3           A       Yes. I knew that on August 4, we had  
4 a Notice of Claim.

5           Q       Okay.

6           A       And the FOIL, I believe.

7           Q       Right. And -- well, just so I'm clear  
8 that I'm understanding you, I'm asking about  
9 settlement discussions in effort to resolve the  
10 claim that the family had against the City of  
11 Rochester. Were you aware as of September 2 that  
12 the law department had initiated those conversations  
13 with the Prude family's lawyers?

14          A       I knew that they had had discussions  
15 with the Prude family lawyers. I don't know  
16 specifically each of the details in that discussion.

17          Q       Well, did anybody ever tell you that  
18 there was going to be an effort to settle the  
19 lawsuit or the claim with the family prior to  
20 September 2?

21          A       Once we receive a Notice of Claim and  
22 our law department works on contacting and working  
23 with the lawyers to go back and forth, they have a  
24 process that they go through.

25          Q       Right.

1 I guess my question is were you ever  
2 informed that specifically with respect to this  
3 matter, the Prude matter, that there was going to be  
4 an effort to resolve the case prior to the filing of  
5 a lawsuit?

6 A That -- well, yes. It's part of our  
7 regular protocol. So there's a demand, and our law  
8 department works to resolve the matter.

9 Q Did you authorize the law department  
10 to attempt to settle the lawsuit with the Prude  
11 family prior to the -- to September 2?

12 A The law department is authorized to  
13 work on the best interests of the City in settling  
14 any case that we may receive in working with lawyers  
15 directly on that.

16 Q Sure. I understand that. I'm asking  
17 a different question. I'm asking whether you  
18 specifically authorized the corporation counsel to  
19 communicate a settlement offer or to engage in  
20 settlement discussions with the Prude family,  
21 separate and apart from what he would do in the  
22 normal course.

23 A No. That would all be in the normal  
24 course of his duties.

25 Q And is it your testimony that you were

1       unaware that there had been an effort to resolve the  
2       lawsuit -- the claim with the Prude family, that you  
3       had not been specifically informed of that?

4               A       I would say I would characterize it  
5       different. Our law department, whenever we are  
6       presented with a lawsuit, a possible lawsuit, they  
7       work with attorneys to resolve the matter. This  
8       would be treated no different than any other case.

9               Q       Did you ever participate in a  
10       discussion or were you aware of any discussion about  
11       the idea that if there was an early settlement of  
12       the Prude family's claim against the City of  
13       Rochester, that might have an impact on the release  
14       of the body-worn camera footage under FOIL?

15              A       No.

16              Q       Did you ever authorize a specific  
17       dollar amount to be paid to the Prude family -- I'm  
18       talking about prior to September 2 -- in settlement?  
19       I don't need to know the number. I'm just curious  
20       whether you authorized a number.

21              A       No. I'm not authorized to do that by  
22       myself.

23              Q       Well, did you discuss a number with  
24       corporation counsel --

25              A       No.

1 Q -- prior to September 2?

2 A No.

3 Q Did you discuss with corporation  
4 counsel the idea that the terms of -- strike that.

5 I'm going to take you, Mayor Warren,  
6 to page 16. And there's a question from a reporter  
7 at line 9, just to put this into context. And then  
8 starting around -- starting at line 20 you say, I  
9 would be the first one before you letting this  
10 community know that this situation -- even against  
11 my law department's advice many times. As you all  
12 know, I'm constantly being sued for things that I  
13 have said before investigations have been concluded.

14 I'm interested in what you meant when  
15 you said against your law department's advice.

16 A I have in the past made statements  
17 that the law department did not agree with me  
18 making. For example, [REDACTED]  
19 [REDACTED] case.

20 Q [REDACTED] I caught. What was the other  
21 one?

22 A [REDACTED]

23 Q [REDACTED] Okay.

24 Was it against your law department's  
25 advice to make statements at this point in time

1 about the Prude matter?

2 A Yes, it was.

3 Q And what was the advice given to you  
4 on that score?

5 A In this particular case, that this was  
6 being handled by another agency, a state agency, and  
7 in the Attorney General's office. In those other  
8 cases it was being handled by the City of Rochester,  
9 so I classified it and looked at it differently.

10 Q Well, in those other cases, or at  
11 least with respect to ██████████, was that a City of  
12 Rochester or was that Monroe County DA's office?

13 A We were in charge of the investigation  
14 and the DA was the agency that would be looking at  
15 the prosecution.

16 Q Got it.

17 A But the DA's office in my mind is not  
18 the Attorney General's office, because it doesn't  
19 necessarily supersede the City.

20 Q Understood.

21 So there's a passage at the beginning  
22 of page 17 where you say, This is the first case  
23 in -- since I've been mayor and the police chief  
24 that has been handled by another agency, the  
25 Attorney General's office. Because of that, our law

1 department has indicated to me that I have to make  
2 sure that I adhere to the Executive Order, to the  
3 Attorney General's instructions of them concluding  
4 their investigation. And so I just want people to  
5 be very clear, this is not something that's in our  
6 wheelhouse, in our control, at this moment in time,  
7 and had it been, then, for me, this would be  
8 something we would have talked about months ago.  
9 Unfortunately, I can't, because of what the law  
10 department is telling me that I have to adhere to,  
11 and that's the executive order. That's the Attorney  
12 General's office, you know, investigation.

13 Do you see that?

14 A Yes.

15 Q I notice in this passage -- strike  
16 that.

17 Let me ask this question: When you  
18 delivered these remarks, were you speaking from  
19 notes or a script that you developed in advance?

20 A Part of the way, yes.

21 Q Okay. Were these remarks something  
22 you had scripted out before you got up to speak to  
23 the press that day?

24 A Yes, some of them, yes.

25 Q Which parts of these remarks that we

1 just talked about were previously scripted?

2 A I believe the remarks in the very  
3 beginning and maybe the conclusion. I'm not sure.

4 Q Well, I guess my question is you seem  
5 to -- you mention both the executive order and the  
6 Attorney Generals' instructions in this passage.  
7 Why did you draw that distinction here?

8 A The executive order gave the Attorney  
9 General's office the authority, and it outlined what  
10 the Attorney General's office would be charged with,  
11 and the Attorney General's office is the agency  
12 that's in charge and, therefore, we have to comply  
13 with what they told us.

14 Q Okay. And when you say, "and had it  
15 been, then, for me, this would be something we would  
16 have talked about months ago," the "this" in that  
17 sentence is the Prude matter, right?

18 A Yes.

19 Q And when you say "it's something we  
20 would have talked about," what you're saying is  
21 that's something you would have made public remarks  
22 on; is that fair?

23 A Yes.

24 Q And when you say that it's something  
25 you would have talked about months ago, when would



1 you have made public remarks about the Prude matter  
2 had it been up to you?

3 A I wish I would have made remarks about  
4 it on March 23 and had seen the video. But because  
5 I had not seen the video until August 4, it would  
6 have been on August 4 when I would have been made  
7 aware. But because I had believed that there was no  
8 reason to see the video based on what I had been  
9 told, I did not see that video until August 4. When  
10 I saw that video on August 4, I wanted to make  
11 comment on it, however, I was told by our  
12 corporation counsel that I could not.

13 Q Do you believe today, Mayor Warren,  
14 that the Attorney General's office instructed the  
15 City of Rochester not to make public comments about  
16 the Prude matter?

17 A They said they had not.

18 Q Right.

19 And do you have any explanation as to  
20 why the AG's officer has said they had not given  
21 that instruction but you were led to believe that?

22 A No, I do not.

23 Q Have you done anything to find out why  
24 that discrepancy exists?

25 A Our law department believed that that

1 was the instructions that they were provided. The  
2 AG's office believed that they did not.

3 Q Do you think somebody's telling the  
4 truth and somebody's not telling the truth in that  
5 dispute?

6 A That was everyone's understanding.

7 Q Or maybe a misunderstanding; is that  
8 fair?

9 A Is what fair?

10 MS. COHEN: Are you asking her to  
11 guess? I don't think you want that.

12 Q Isn't it the case that as you sit here  
13 today, Mayor Warren, that you now know that what the  
14 Attorney General's office communicated to the law  
15 department was a suggestion about delaying the  
16 release of records and not anything having to do  
17 with not making public statements? You know that  
18 now, right?

19 A I know that the AG -- the Attorney  
20 General has indicated that they did not explicitly  
21 tell the City not to make public statements.  
22 However, I do know that the City, corporation  
23 counsel, believed that that was part of what was  
24 discussed.

25 Q Did corporate counsel tell you that he

1 personally spoke to folks from the Attorney  
2 General's office prior to September 2?

3 A I don't remember whether he said that  
4 "I" personally or that "we."

5 Q "We" meaning someone in the law  
6 department but not him personally?

7 A The law department, yes.

8 Q You recall that -- excuse me one  
9 second. I'm getting some background noise here.

10 Do you recall, Mayor Warren, that on  
11 September 3 the Attorney General's office announced  
12 that they had no objection to the City of Rochester  
13 proceeding with discipline against the officers in  
14 connection with the Prude matter, right?

15 A Yes.

16 Q Okay. And how did that announcement,  
17 to your knowledge, come to pass?

18 A The Attorney General announced it.

19 Q Did somebody from the City of  
20 Rochester ask them to make that statement?

21 A No.

22 Q Did they communicate --

23 A Not that I know of; let me just say  
24 that. I don't know.

25 Q Right.

1                   Did anybody communicate to you that --  
2                   that the Attorney General was going to make that  
3                   announcement before it was made publicly?

4                   A           No.

5                   Q           Okay.  So to your knowledge, that's  
6                   something you've learned by virtue of it being made  
7                   as a public statement by the AG's office?

8                   A           Yes.

9                   Q           Okay.  I'm going to show you what  
10                  we've marked as Exhibit 11A to your deposition.  
11                  This is another transcript that we created, Mayor  
12                  Warren, from a video of a news conference that you  
13                  participated in.  This one was on September 3.  And  
14                  I'll start by asking you on page 2 of the  
15                  transcript, at line 14, you say, quote, And I stand  
16                  here against the advice of our corporation counsel,  
17                  but I would not be who I am today had I not -- if I  
18                  don't stand on my own truth.

19                  Do you see that?

20                  A           Yes.

21                  Q           What was the advice of corporation  
22                  counsel that you were referring to?

23                  A           Not to suspend the officers.

24                  Q           So Mr. Curtin advised you not to  
25                  suspend the officers who were involved in the Prude

1 incident?

2 A Yes.

3 Q When did he give that advice?

4 A Earlier that day.

5 Q And what was his basis for giving that  
6 advice as he explained it to you? If he did.

7 A If I recall correctly, that all seven  
8 officers did not necessarily participate. However,  
9 because they stood by, it's like with the Sippel  
10 case and the McAvoy case, and allowed it to happen  
11 was why I believed that they should be disciplined  
12 as well.

13 Q Just so I'm clear, on page 3, line 13,  
14 you say, That is why I'm suspending the officers  
15 today against the advice of counsel, and I urge the  
16 Attorney General to complete her investigation.

17 You see that, right?

18 MS. COHEN: You're not screen sharing.

19 MR. CELLI: I'm sorry. I should be  
20 sharing this. Let me do that.

21 Q Can you see it now? Whatever there is  
22 to see.

23 MS. COHEN: It's blank.

24 Q Hold on.

25 So I'm on page 3. And I'm focused on

1 line 13. That's why I'm suspending the officers in  
2 question today against the advice of counsel.

3 Do you see that?

4 A Yes.

5 Q And I think I understand what you're  
6 communicating there, but I just want to clarify. If  
7 you go back a page where you say, "I stand here  
8 against the advice of our corporation counsel," did  
9 the corporation counsel at this point give you  
10 advice not to make a public statement?

11 A No. This was specifically regarding  
12 the matter on the suspension. He knew that I was  
13 going to announce the suspension.

14 Q Got it. Just wanted to make sure.

15 And when you say on page 3, line 18, I  
16 understand that the union may sue the City for it,  
17 you're saying that the union may sue the City for  
18 your decision to suspend the officers at this point;  
19 is that correct?

20 A Yes. Because the chief disagreed with  
21 me.

22 Q What do you mean by that?

23 A The chief did not believe that the  
24 officers should be suspended because he believed  
25 that they did nothing wrong.

1           Q       And was there a discussion that you  
2           and the chief had about that topic before you gave  
3           this statement?

4           A       Not right before we gave the  
5           statement. Throughout the course of after I viewed  
6           the video there was a clear difference of opinion on  
7           what this video showed.

8           Q       Okay. That was really my question.  
9           Did you have -- when you were making the decision to  
10          suspend these officers, you decided that after the  
11          Attorney General said that it was okay, right?

12          A       Yes.

13          Q       And at that point did you talk to the  
14          chief about your decision to do that, or were you  
15          just going based on what you understood his views to  
16          be from your conversations on August 4?

17          A       I informed the chief that I would be  
18          suspending the officers.

19          Q       Right. And what did he say to that?

20          A       I believe he said that he disagreed.

21          Q       And was there any other conversation  
22          on that subject?

23          A       I don't believe so.

24          Q       Okay. On page 3, line 22, you say, In  
25          addition, I have addressed with the police chief how

1 deeply and personally and professionally  
2 disappointed I am for him failing to fully and  
3 accurately inform me about what occurred with  
4 Mr. Prude. He knows he needs to do better to truly  
5 protect and serve our community, and I believe he  
6 will.

7 Do you see that?

8 A Yes.

9 Q What were you referring to there when  
10 you said you had addressed with the police chief how  
11 deeply and personally and professionally  
12 disappointed you were?

13 A The letter that I had sent to him.

14 Q Other than the letter, had you had any  
15 discussions that you were referring to in that  
16 passage?

17 A Yes, about the sharing of the  
18 body-worn camera videos, so the follow-up to the  
19 letter of sharing of body-worn camera video, use of  
20 force, and, you know, how we're -- how he sees  
21 things and how I see things.

22 Q Other than on August 4, when did you  
23 have that conversation with the chief?

24 A I don't -- it was after he came back  
25 from vacation, so had to be sometime at the end of



1 August.

2 Q Did you have a one-on-one meeting with  
3 the chief on the subject of the Prude matter on  
4 August 24?

5 A It's possible that that was part of  
6 the discussion, among other things.

7 Q Do you remember having a face-to-face,  
8 one-on-one conversation with the chief where Prude  
9 was discussed? In August, just to be clear, other  
10 than August 4.

11 A I don't remember. I know that we had  
12 been discussing body-worn camera changes and the  
13 certain protocols in COVID and violence.

14 Q What do you recall about those  
15 discussions?

16 A Basically we were still dealing with  
17 COVID and, you know, making sure that officers had  
18 the proper PPE. We had many violent incidences,  
19 murders were up, shootings were significantly up,  
20 and, you know, we were still dealing with some  
21 social unrest from the George Floyd -- George Floyd  
22 case. So all of those things had been going on  
23 throughout the summer.

24 Q And when you said to the public on  
25 September 3 that you had addressed with the police

1 chief how disappointed you were with him for, quote,  
2 failing to fully and accurately inform you of what  
3 occurred with Mr. Prude, was that in some way part  
4 of the conversations that you're referring to now?

5 A That was in the letter.

6 Q Okay. Did you tell Dr. Cephas Archie  
7 that you were going to be making a statement along  
8 these lines before you made it?

9 A Yes. We all had a -- Dr. Archie along  
10 with Alex, along with the corporation counsel, I  
11 believe -- maybe corporation counsel wasn't there.  
12 I'm not sure. There was a meeting that took place  
13 where the deputy mayor had encouraged me to fire the  
14 chief. Before this press conference.

15 Q And was that the meeting that Alex  
16 Yudelson, the deputy mayor, and Dr. Archie were  
17 present for?

18 A Yes.

19 Q And was Mr. Roj there as well?

20 A I don't remember.

21 Q Dr. Archie is the chief diversity  
22 officer for the City of Rochester?

23 A Yes.

24 Q And did you invite him to the meeting  
25 to talk about Chief Singletary or did that happen

1 some other way?

2 A It happened some other way because of  
3 the fact we were talking about the entire incident,  
4 and this had to do with racial relations and the  
5 racism in the community, and we wanted to make sure  
6 the language that was included in the remarks was  
7 not going to incite but, you know, to bring balance.  
8 And so that's why --

9 Q So this was -- I'm sorry. I cut you  
10 off.

11 A So when we had done this -- wrote this  
12 speech, as well as previously he had been brought in  
13 to address and look at language that may be  
14 inciteful, especially when you're talking about  
15 things that are racially intense.

16 Q Do you have a copy of -- strike that.  
17 So am I understanding this was a  
18 meeting to discuss the remarks that you were to  
19 deliver on September 3?

20 A Yes. And also at that meeting the  
21 issue came up about the chief and whether I should  
22 terminate him.

23 Q Right. And the deputy mayor took the  
24 view that the chief should be fired, right?

25 A Yes.

1           Q       And Dr. Archie took a contrary  
2 position; is that correct?

3           A       Everyone else in the room took a  
4 contrary position.

5           Q       Okay. And you decided at that point  
6 not to fire the chief, correct?

7           A       Correct.

8           Q       And why is that?

9           A       For several reasons. At that point in  
10 time I did not have the deputy mayor's report. I  
11 fundamentally believed that the chief and I saw this  
12 case differently. I believe that the chief was --  
13 you know, for me, I'm an African-American woman in  
14 the City and he's an African-American man, we were  
15 both born and raised there, we were both committed  
16 to the community. That didn't change. But we  
17 fundamentally just viewed this situation  
18 differently, and that we could get over it.

19          Q       Got it.

20                   And did you ever make a remark to the  
21 deputy mayor that you were not going to be the mayor  
22 who marched the first black chief out of the public  
23 safety building, or words to that effect?

24          A       I did not say that explicitly. I  
25 think that the deputy mayor, based on my response,

1 may have interpreted that way.

2 Q You know that he has publicly said  
3 that you said that, right?

4 A Yes. I often talk about race in  
5 not -- in being committed to diversity.

6 Q No, I understand. I just want to  
7 understand, you know that he has said that you said  
8 that, and my question is did you say it, or you  
9 don't remember saying it, or you deny saying it?

10 A I might have said it in a -- might  
11 have said it not those exact words, if you  
12 understand what I mean.

13 Q Yeah. Sure. In sum and substance  
14 that --

15 A In sum and substance, yes.

16 Q Okay.

17 A But he's not the first black police  
18 chief, I just want you to know that.

19 Q Okay. In Rochester he's not?

20 A No. He's like the third or fourth.

21 Q Okay.

22 A We had -- he's the third. We had  
23 Dr. Alexander, we had Chief Moore, and then Chief  
24 Singletary.

25 Q Did you ask Dr. Archie to preview for

1 Chief Singletary what you intended to say at the  
2 September 3 press conference?

3 A I did not ask Dr. Archie to do that.  
4 Dr. Archie and the chief are friends and have been  
5 friends prior to any of this. So I think that he  
6 took that on his own to do that.

7 Q When did you learn that Dr. Archie had  
8 kind of previewed for the chief what you were going  
9 to say at the September 3 press conference?

10 A I think after the meeting. After the  
11 press conference.

12 Q Okay. And Dr. Archie told you that he  
13 had done that?

14 A Yes, he said that, you know, I just --  
15 I checked on the chief and I talked to him about the  
16 remarks.

17 Q Uh-huh. And what did you say to him?  
18 What was the conversation?

19 A How's he doing.

20 Q And what did Dr. Archie have to say?

21 A I think he said that, you know, he was  
22 upset because I had suspended the officers and, you  
23 know, upset about everything that was happening, and  
24 that was about it.

25 Q Did Dr. Archie tell you that Chief

1 Singletary was upset that you had communicated in  
2 your public remarks that he had failed to fully and  
3 accurately inform you about what had occurred with  
4 Mr. Prude?

5 A No, I did not remember that.

6 Q So moving on with the transcript from  
7 the 3rd, on the top of page 4, line 4, you say,  
8 Experiencing and ultimately dying from a drug  
9 overdose in police custody, as I was told by the  
10 chief, is entirely different than what I ultimately  
11 witnessed on the video provided to me by the law  
12 department on August 4.

13 Do you see that?

14 A Yes.

15 Q And when you were talking about  
16 experiencing and ultimately dying from a drug  
17 overdose, that was your way of describing what Chief  
18 Singletary had told you on March 23 about the  
19 incident between the police and Mr. Prude; is that  
20 correct?

21 A Yes.

22 Q And then further on down on line 18  
23 you say, I also want to be very clear today about  
24 what I knew about Mr. Prude's death and when I knew  
25 it. After our police department responded to the

1 911 call on March 23, I was informed later that day  
2 by Chief Singletary that Mr. Prude had an apparent  
3 drug overdose while in custody. Chief Singletary  
4 never informed me of the actions of his officers to  
5 forcibly restrain Mr. Prude.

6 Do you see that?

7 A Yes.

8 Q And were you communicating to the  
9 public on September 3 that Chief Singletary had not  
10 informed you that there had been a physical  
11 restraint of Mr. Prude on March 23?

12 A Correct.

13 Q Okay. And were you intending to  
14 communicate to the public at that point that you had  
15 no knowledge that there had been a physical  
16 restraint of Mr. Prude prior to August 4?

17 A My recollection of the conversation  
18 with the chief on the 23rd was that Mr. Prude was  
19 high off of PCP and was being taken into custody,  
20 and that he basically had lost consciousness from  
21 that; that this was a routine arrest, that  
22 everything was done by the book, and that there were  
23 no issues.

24 Q So reading down at the bottom of 4 and  
25 over to 5, you say, I only learned of those



1 officers' actions on August 4 when corporation  
2 counsel Tim Curtin reviewed the video while  
3 fulfilling the FOIA for Mr. Prude's family.

4 Do you see that?

5 A Yes.

6 Q And the actions you're talking about  
7 there are what?

8 A The actions that the officers actually  
9 put a spit sock on him, tightened the spit sock  
10 around his head, and did a plank on his head.

11 Q Got it.

12 Looking at page 6, line 16, you say,  
13 In this case my failure in all of this that I truly  
14 say sorry for was using my legal mind in all of  
15 this. I'm an attorney by trade and with the mindset  
16 of an attorney and not necessarily the mindset of a  
17 human being, of a mother, of a friend, of a sister,  
18 of a daughter, of a cousin, didn't rely on the very  
19 fabric of what makes me and my foundation and my  
20 faith and family.

21 What did you mean when you said you  
22 were using your legal mind in all of this as opposed  
23 to the other parts of your personality?

24 A I was listening to all of the legal  
25 advice that I was hearing, meaning that I didn't

1       come forward and talk about this because the  
2       corporation counsel had advised me not to. So  
3       those -- that legal advice that, you know, we  
4       couldn't suspend the officers because legally that  
5       would impede the Attorney General's investigation;  
6       that, you know, we couldn't proceed with any  
7       internal investigations because of the AG's office.  
8       So all of those legal factors were the deciding  
9       factor in me not coming forward when I saw the video  
10      on August 4.

11               Q       Understood.

12                       Was one of the issues that also you  
13      consider, from the way you put it, your legal mind  
14      was the exposure, the liability exposure that the  
15      City would have as a result of what had happened to  
16      Mr. Prude?

17               A       No. We were already liable. That  
18      wouldn't go away. We couldn't bring him back.

19               Q       Moving to page 7 -- and this is really  
20      where you talk a little more about the legal side.  
21      Starting on line 1, I allowed the legal side of me,  
22      being sued four times already, losing my mentor on  
23      my birthday, and the Assistant Attorney General's  
24      request that we not come forward and talk about  
25      this, to keep me from following what I know is my

1 true north and what this community has counted on  
2 from me time and time again.

3 Just so we have a clear record, what  
4 are you referring to there when you say the  
5 "Attorney General's request that we not come forward  
6 and talk about this"?

7 A I'm referring to the law department's  
8 assertion that the AG's office had told us that we  
9 could not discuss this case while it was under  
10 investigation.

11 Q Moving forward to page 12, line 18,  
12 you say, quote, Our understanding yesterday from the  
13 Attorney General -- this is the Assistant Attorney  
14 General -- and from conversations that we've had,  
15 and based on the timeline that we can provide to  
16 you, is that they wanted the City to remain out of  
17 this until they had finished their investigations.  
18 Now they are telling us something different.

19 What was the conversation that  
20 occurred yesterday, which I guess would be September  
21 2, that you're referring to here?

22 A That the Attorney General said that  
23 she had not -- her office had not instructed us  
24 that.

25 Q Well, had you had a conversation with

1 the Attorney General's office yourself on September  
2 2?

3 A Yes.

4 Q And that was the conversation with  
5 General James?

6 A Is that the day the video had been  
7 released -- the original day the video had been  
8 released?

9 Q Yes.

10 A Yes.

11 Q And is that the one you already  
12 testified about, or is this a different  
13 conversation?

14 A No. That's the one I already  
15 testified about.

16 Q Okay. When you refer in this answer  
17 to the timeline, what were you referring to there?

18 A Let me see. Where are you again?

19 Q You see where I'm highlighting?  
20 That's line 21.

21 A Yes. The law department had prepared  
22 that timeline that we had discussed earlier.

23 Q Right. So just so I can show it to  
24 you, were you referring to what had previously been  
25 marked as Warren Exhibit 10?

1           A           There were several timelines, so I'm  
2 not sure if I was referring to that timeline or  
3 another timeline that had been prepared by the  
4 media -- prepared for the media.

5           Q           Okay. Well, let me just ask about  
6 that. Let me show you what's been previously marked  
7 as Warren Exhibit 9. It's a long document. I'm not  
8 going to go through it in detail, but just to orient  
9 you, this is an email from Alex Yudelson to Tim  
10 Curtin on the 3rd at 2:35 p.m., and the attachment  
11 is called timeline9320lawedits.doc. And  
12 Mr. Yudelson said, The Mayor asked for a few  
13 additions here for her reference. I made them in  
14 bold so you have them. Thanks. AY.

15                       Do you see that?

16           A           Yes.

17           Q           And then this -- hold on one second.  
18 Where are the rest of the pages? I think I have a  
19 little glitch here because the additional pages are  
20 not attached.

21                       MS. COHEN: Andy, I don't think they  
22 were attached in the versions we got  
23 either.

24                       MR. CELLI: They weren't? Okay. I  
25 guess I missed that.

1           Q       So much for that exhibit. Put that  
2     aside.

3                    I wanted to go back to Exhibit 11A,  
4     which is the transcript from September 3.

5           A       Yes.

6           Q       And I'm going to go to page 13. So a  
7     reporter asks here, starting at line 5, Did the  
8     chief -- I was a little confused about the chief.  
9     So the chief knew more than he actually told you?  
10    And you responded to that. And in the course of  
11    responding to that, you say, At no time did I ever  
12    know the extent or that there was any hands-on  
13    incidents with these officers until August 4, well  
14    after the Attorney General was involved, well after  
15    the DA's office did their -- turned it over to the  
16    AG's office.

17                   Do you see that?

18          A       Yes.

19          Q       Explain what you were trying to  
20    communicate there when you said, "At no time did I  
21    ever know the extent or that there was any hands-on  
22    incidents with these officers."

23          A       My understanding, that this was a  
24    routine arrest and that there was nothing that would  
25    raise the alarm that there would be a problem here;

1 that everything was by the book from my discussions  
2 with the chief. So nothing alerted me that there  
3 was something different on this video.

4 Q I'm sorry. I cut you off.

5 A Nothing alerted me that there was  
6 anything different on the video until I actually saw  
7 the video.

8 Q In a routine arrest, however, officers  
9 do lay hands on arrestees, right?

10 A To put handcuffs on them, yes.

11 Q Right.

12 A That's all normal.

13 Q Right. And so when you made this  
14 comment to -- in public on the 3rd, you were not  
15 suggesting that the officers had not touched  
16 Mr. Prude at all; you were just saying -- well, let  
17 me ask it that way. I'm sorry. I got interrupted.

18 So when you made this comment on  
19 September 3, you were -- were you trying to  
20 communicate to the public that you had been told  
21 that the officers had not had any physical contact  
22 whatsoever with the arrestee, Mr. Prude?

23 A No. I'm trying to say that my  
24 recollection was that there was nothing that was  
25 done that was outside of a routine arrest. Not that

1 they had -- not what I saw in the video.

2 Q Right. Well, in the context of --  
3 what you refer to here is that you were told by  
4 Chief Singletary that Mr. Prude had overdosed,  
5 right?

6 A That he -- the specific that he was  
7 high off PCP and it was most likely that he  
8 overdosed.

9 Q Right.

10 And I guess my question is in this  
11 answer, as you read it, are you disclosing the fact  
12 that you were informed that there had actually been  
13 an arrest of Mr. Prude on March 23?

14 A They were taking him into custody.

15 Q Right. I guess what you say is that  
16 the chief told you that they were taking Mr. Prude  
17 to the hospital for a possible overdose and that he  
18 may die. Is that what you're referring to?

19 A Yes. In a mental hygiene arrest  
20 that's what they do, they don't take them to jail,  
21 they take them to the hospital.

22 Q Right. I guess in this answer I'm  
23 just trying to figure out whether you refer to it as  
24 a mental hygiene arrest. I don't see that you did.

25 A Well, whether it's a drug overdose



1 or -- my assertion is that he's high off of PCP,  
2 he's having a mental reaction to that, he would be  
3 taken to the hospital based on that, that's the  
4 routine response to these types of cases. They  
5 wouldn't be taken to the -- they wouldn't be taken  
6 to jail; they would be taken to the hospital.

7 Q I want to direct your attention to  
8 page 14, line 3. And you say, When I watched the  
9 video, I was enraged. I wanted to come forward that  
10 day.

11 When you say you wanted to come  
12 forward that day, what did you mean?

13 A I wanted to talk about it publicly and  
14 let the public know what happened.

15 Q And a reporter responds, Well, why  
16 didn't you? And your response is, Our law  
17 department explained to me that the Attorney  
18 General's office, or the Assistant Attorney  
19 General's office, asked us not to get involved in  
20 the investigation and not to do anything until they  
21 were done.

22 And then skipping down to line 17,  
23 Now, I agree with you. August 4 when I found out, I  
24 wanted to come forward. I allowed the legal mind  
25 and the legal side to win out on my humanity on that

1 day, and for that I apologize.

2 What were you trying to communicate in  
3 that passage?

4 A That -- exactly what I said, that all  
5 of those legal issues played -- and the advice of my  
6 corporation counsel on what the Attorney General's  
7 office had instructed us, and the fact that the  
8 Attorney General's office, in my estimation,  
9 supersedes the City of Rochester had precluded us  
10 from saying anything. Subsequently the Attorney  
11 General's office had indicated that that -- that  
12 their understanding was that that wasn't true.

13 Q Mayor Warren, I want to take you to  
14 page 24 of this transcript. At line 6 -- it's a  
15 compound question, but the reporter asks, Were you  
16 aware of this case being presented for or referred  
17 to the state AG back in April, and were you aware of  
18 the ME's findings that it was a homicide?

19 Wait. I'm on the wrong page.  
20 Apologies.

21 Page 24, line 6. The reporter says,  
22 Did Chief Singletary know the exact what happened or  
23 was he told the same thing you were told? And your  
24 response is, You need to talk to Chief Singletary  
25 about what he knew and when he knew.

1 Do you see that?

2 A Yes.

3 Q Why did you give that answer? Why did  
4 you refer this back to Chief Singletary at this  
5 point?

6 A Because the chief and I fundamentally  
7 disagree with what's on this video.

8 Q Right. But you had an understanding  
9 of what you had been told by him, right?

10 A Yes. And I had already expressed that  
11 earlier.

12 Q So at this point you just figured it  
13 was best to have him explain his own conduct; is  
14 that fair?

15 A Yes.

16 Q Let's go to Warren 23R.

17 Do you recall hearing in the evening  
18 of September 3 that the Attorney General's office  
19 had issued a statement saying that it had never  
20 asked the City of Rochester to decline to make  
21 public statements about the Prude matter?

22 A Yes.

23 Q And was this brought to your attention  
24 in this text exchange starting around 9:47 p.m.?

25 A Yes.

1           Q       And you say at 10:06, you write, You  
2 probably need to put out a statement that clarifies  
3 that, because that's what people are latching on to,  
4 so there's clarity.

5                    Do you see that?

6           A       Yes.

7           Q       And what were you referring to there?

8           A       Our law department understanding of  
9 what their directive was from the AG's office.

10          Q       Okay. And, in fact, Mr. Roj did put  
11 out a statement that night at around 10:36, right?

12          A       Correct.

13          Q       Did you review that statement before  
14 it went out?

15          A       I don't remember.

16          Q       I'll show you a copy just to kind of  
17 see whether that helps.

18                    This is what we've marked as Warren  
19 11. Is this the statement that Mr. Roj put out at  
20 around 10:36 p.m. on September 3?

21          A       Yes.

22          Q       And having looked at it, do you now  
23 recall reviewing this before it went out?

24          A       I don't remember if I specifically  
25 reviewed it because it wasn't a statement that was

1 quoting me, but more so clarifying a position.

2 Justin might have just wrote it and sent it.

3 Q Do you recall that Mr. Curtin -- I can  
4 get rid of this -- and Stephanie Prince from the law  
5 department gave a news conference on September 4?

6 A Yes.

7 Q And what's your understanding of how  
8 that news conference came to be organized?

9 A The media had called our  
10 communications director and wanted some clarity on  
11 what the law department knew or what their  
12 discussion with the AG's office was, and so the  
13 corporation -- the -- Justin made him and Stephanie  
14 available to talk about it.

15 Q Got it.

16 Did you speak to Mr. Curtin before he  
17 gave his remarks in the news conference?

18 A No.

19 Q Did you speak to him afterwards about  
20 the remarks that he gave at any time?

21 A In general about the -- how did we  
22 misunderstand what the directive for the AG's office  
23 was.

24 Q And when did you have that  
25 conversation with Mr. Curtin?

1           A       After the deputy mayor gave his  
2       report.

3           Q       Uh-huh.  And what was Mr. Curtin's  
4       response to that question?

5           A       That that was his understanding from  
6       the directive that -- the information that had been  
7       shared with him by Stephanie, that that was the  
8       directive from the AG's office.

9           Q       But is it fair to say that after  
10      reading the deputy mayor's managerial review, you  
11      concluded that that was not, in fact, the directive  
12      that the law department had been given by the AG's  
13      office?

14          A       The law department was not -- was  
15      given directive by the AG's office specifically  
16      about the -- more so about the video.

17          Q       Right.

18          A       They were given specific directive  
19      about the video, not about public comment.

20          Q       Was the fact that Mr. Curtin was  
21      telling you emphatically that the AG's office had  
22      directed him that there be no public comments by the  
23      administration, that that turned out to be  
24      incorrect, was that a factor that you considered  
25      when you suspended Mr. Curtin?

1 A It was a number of factors.

2 Q Was that one of them?

3 A Yes.

4 Q What were the others?

5 A The fact that a lot of the background  
6 on the exchange, the Notice of Claim, the delay in  
7 getting the video footage out, the AG's office being  
8 involved, and the email specifically that said for  
9 them to send me the video in June and that did not  
10 come over to me.

11 MR. CELLI: So can you read back just  
12 the last part of that answer, please.

13 (Whereupon, a portion of the record  
14 was read by the reporter.)

15 BY MR. CELLI:

16 Q When you're referring to the emails  
17 that specifically said to send you the email in  
18 June, that was an email by -- from a senior person  
19 at the RPD; is that correct?

20 A Yes.

21 Q And your view is that Mr. Curtin bore  
22 some responsibility for you not having been informed  
23 in June about the RPD's position on releasing the  
24 body-worn camera footage?

25 A The email was forwarded from the chief

1 to Mr. Curtin, and that did not -- it could have --  
2 the chief sent me emails all the time, so it could  
3 have included both of us, because I believe that the  
4 email said, Corporation counsel and the mayor needs  
5 to see this.

6 Q Right. But one of the things that  
7 Mr. Curtin has suggested is that it wasn't his job  
8 to report to you that the RPD had concerns about  
9 releasing the body-worn camera footage. Do you  
10 agree with that?

11 MS. COHEN: Andy, I don't know if  
12 this -- I don't know that she knows he  
13 said that or not or --

14 Q I'll represent to you that that's the  
15 gist of his testimony. Do you agree with that?

16 A Repeat the question.

17 Q Yeah.

18 If I represent to you that the gist of  
19 Mr. Curtin's testimony is that it was not his job to  
20 let you know about the discussion with RPD  
21 concerning the release of the body-worn camera  
22 footage, that discussion happening in the early part  
23 of June, would you agree with him?

24 MS. COHEN: I'm going to object to  
25 assuming that's an accurate representation



1                   of his testimony.

2                   A        I really don't know how to answer that  
3 question.

4                   Q        It wasn't the best question in the  
5 world, so let me ask it a different way.

6                                In what way was the failure to forward  
7 the emails among senior people at RPD and the corp.  
8 counsel to you a factor in your decision to suspend  
9 Mr. Curtin?

10                   A        Because in the email it specifically  
11 said, The mayor needs to see this.

12                   Q        And would you agree that among other  
13 people who would have had the responsibility to make  
14 sure that you saw it would have been Mr. Curtin?

15                   A        Only if he didn't assume that the  
16 chief had sent it to me.

17                   Q        Right. But where we started this  
18 conversation was about your reasons for suspending  
19 Mr. Curtin, and you mentioned this in particular.  
20 So is it fair to say that you concluded that  
21 Mr. Curtin made an error in not forwarding this  
22 material to you in June?

23                   A        Yes.

24                   Q        Ever talk with Mr. Curtin about why he  
25 was suspended?

1 A Yes.

2 Q When was that conversation?

3 A The day I suspended him.

4 Q And what did you say to him and what  
5 did he say to you?

6 A I told him that I went through the  
7 report and that there were several things that I  
8 believed -- places where the law department had  
9 failed to contact me and inform me. I didn't  
10 believe that it was intentional, but because it was  
11 significant, that I was going to suspend him for 30  
12 days.

13 Q And how did he respond to that?

14 A He was not happy, because his -- he  
15 believed that he wasn't intentional in anything that  
16 happened; that it was sincerely his belief that the  
17 AG's office had given that directive; that, you  
18 know, I had -- that he didn't intentionally tell me  
19 something that was wrong.

20 Q Have you ever criticized Mr. Curtin  
21 for the advice that he gave you about not making  
22 public comment about the Prude matter?

23 A When you say "criticized"...

24 Q Yeah. Have you ever told him you were  
25 wrong about that?

1           A           In the discussion of the suspension, I  
2 explained that there were several places that I  
3 believe that the law department had failed.

4           Q           Right. And my question is, is one of  
5 the places that you pointed to that particular  
6 issue?

7           A           As it was his understanding. His  
8 understanding and the AG's understanding is  
9 different.

10          Q           You pointed that out to him when you  
11 told him you were suspending him?

12          A           Yes.

13          Q           Did you send text messages to Chief  
14 Singletary on the evening of September 3 and the  
15 morning of September 4, 2020?

16          A           What day was that? Was that --

17          Q           So September 3 was -- we just went  
18 through the transcript of the news conference that  
19 happened that day, I believe.

20          A           Yes. I sent an email -- not an email.  
21 Might have sent a text message to check up on him.  
22 And the reasons why is because even when I suspended  
23 Justin and Tim, I checked up on them. I signed up  
24 to be criticized by the public. I felt like they  
25 didn't. And there was a lot of things that were

1       happening that, you know, I was very concerned with  
2       people's mental health when people, you know, called  
3       for your resignation or say things about you. I  
4       wanted to check up on everybody.

5               Q       Okay. So do you recall sending a text  
6       message at 10:29 p.m. on September 3 to Chief  
7       Singletary saying, Are you okay?

8               A       I probably did, yes.

9               Q       Did you call him on the morning of the  
10      4th and ask him how he was doing?

11              A       Yes. Probably.

12              Q       And did you on that occasion tell him  
13      words to the effect, I know you and I have had a  
14      disagreement as to how events unfolded, but we need  
15      to move past this for the both of us?

16              A       I probably said that, We've had a  
17      disagreement, fundamentally, on what this video  
18      shows, and that we can, you know, get past it, yes.

19              Q       Do you think as you sit here today,  
20      Mayor Warren, that there's a disagreement -- strike  
21      that.

22                      You've read Chief Singletary's Notice  
23      of Claim, right?

24              A       Yes.

25              Q       And in that Notice of Claim, he

1 asserts that you and others suggested that he lie  
2 when he give testimony -- gives testimony about this  
3 matter, right?

4 A That's what he asserts.

5 Q Right.

6 And would you agree that one of the  
7 things that he's claiming that you and others asked  
8 him to lie about is exactly what he communicated to  
9 you about the Prude arrest in March and April of  
10 2020? Right? Just characterizing what he is  
11 saying.

12 MS. COHEN: I'm not sure she should be  
13 characterizing whatever his --

14 MR. CELLI: Let me ask it a different  
15 way. Let me ask a different way.

16 Q Do you believe there's a dispute, a  
17 factual dispute, I mean, between you and Chief  
18 Singletary about how much he told you about the  
19 Prude arrest in March and April of 2020?

20 A Yes, I do.

21 Q Okay. What's the nature of that  
22 dispute? How would you describe it?

23 A The dispute is that the chief does not  
24 see anything wrong with the video, and so his  
25 description reflects the fact that he doesn't see

1 anything wrong with the video. And that's not -- to  
2 me, that's not proper protocol, it's not proper  
3 procedure. It's -- you know, tightening a spit sock  
4 around a person's neck that's in distress and doing  
5 a plank on their head is not proper. So there's a  
6 dispute as to what was being shown. And I might  
7 have said, I wouldn't tell anybody that I saw that  
8 video and saw nothing wrong. You know, if I were  
9 you, I wouldn't -- my advice is that, you know, I  
10 wouldn't say that. Like, there's seriously  
11 something wrong with this video. And I don't  
12 understand why you can't -- why you don't see that.

13 Q Right.

14 But you understand that Chief  
15 Singletary is saying that he told you about the  
16 officers' conduct towards Mr. Prude when he spoke to  
17 you in March and April, right?

18 A Absolutely not. Chief Singletary did  
19 not give me any reason to believe that this arrest  
20 was anything other than a PCP overdose, anything  
21 other than a routine arrest. And the text messages  
22 that were sent that never included that -- never  
23 asserted that it was our officers that was at fault.  
24 Every text message started with, The guy on PCP.  
25 That is what he represented it to me as. Not that

1 anything that our officers did contributed to  
2 Mr. Prude's death.

3 Q Certainly you and the chief have a  
4 different point of view about whether the -- whether  
5 the conduct that's shown on the video is acceptable  
6 or not. Is that fair?

7 A That's fair.

8 Q Okay. And you would also agree that  
9 one of the things that you have a dispute with the  
10 chief about is exactly what he told you in March and  
11 April about what happened with Mr. Prude, right?

12 A What I remember him telling me in  
13 March. I don't remember the discussion in April.  
14 Let me be very clear.

15 Q Okay. That's fair.

16 Did you --

17 A Now, let me be clear here, too,  
18 because I want to make sure the record reflects that  
19 I went back and checked on the conversation, and  
20 remember that by my cell phone records that we  
21 talked about earlier.

22 Q Yes. You now recall there were two  
23 calls. I remember.

24 A Yes.

25 MS. COHEN: Just so the record's

1 clear, two calls on the same day. The  
2 conversation in the elevator with the  
3 chief she does not recall.

4 Andy, before you go on, I'm looking at  
5 the court reporter at 5:03. I'm just  
6 curious what you have and if the reporter  
7 needs a break.

8 MR. CELLI: You know, I don't think I  
9 have more than an hour. I know that's a  
10 lot. But if the mayor would like to take  
11 a break --

12 Or Pam, if you would like to for five  
13 minutes, that's fine. If we want to just  
14 plug ahead.

15 MS. COHEN: I think we should take a  
16 five-minute break.

17 (Whereupon, a recess was taken  
18 between 5:04 and 5:10 p.m.)

19 BY MR. CELLI:

20 Q There was a news conference that was  
21 held on Sunday, September 6, correct? Do you  
22 remember that? Is that correct?

23 A With Mayra Brown?

24 Q Yes.

25 A Yes.



1           Q       And during that press conference, you  
2       made a statement to the effect that you believed at  
3       that point that Chief Singletary was the right  
4       person to lead the department forward at that point  
5       in time, right?

6           A       Yes.

7           Q       And during that press conference you  
8       were asked whether the -- and I can show you the  
9       transcript, if you'd like -- whether the mayor --  
10      strike that -- whether you were -- strike that. I  
11      should probably show this to you.

12                   I'm going to show you what was  
13      previously marked as Warren Exhibit 13. We're going  
14      to go to page 11. Line 10, a reporter asks Chief  
15      Singletary, Would you say that you misled the mayor  
16      between March and August? And Chief Singletary  
17      responds, As -- what I did was I provided factual  
18      information based on the incidents that I had at the  
19      time.

20                   Do you see that?

21           A       Yes.

22           Q       And when the chief made that comment,  
23      did you think he was telling the truth?

24           A       His truth.

25           Q       What do you mean when you say "his

1 truth"?

2 A The factual information that he  
3 believes is different than the factual information  
4 that I believe.

5 Q Can you be more specific about that.

6 A Meaning that my assertion -- my  
7 understanding was that this was a PCP overdose and  
8 an in-custody death in a routine arrest; that  
9 nothing was out of the norm or anything that we  
10 needed to be concerned about. When I saw the video,  
11 I did not feel that way.

12 Q So let's go to page 21 of this  
13 transcript. Line 12 the reporter asks, Mayor, you  
14 talked about the timeline of the investigation just  
15 now and you gave a very clear expression of your  
16 confidence in Chief Singletary, but last week it  
17 sounded almost as if you were accusing him of  
18 withholding information, not telling you the whole  
19 story at the time on some important issues. It  
20 sounded like you didn't have confidence in him then.

21 And you respond, I -- I clearly,  
22 expressly at that -- that press conference stated  
23 that I believed Chief La'Ron Singletary was the best  
24 person to lead this department. If that was what  
25 you interpreted, then I am sorry. I clearly

1       unequivocally said that Chief La'Ron Singletary is  
2       the person to lead that department. And when you  
3       look through the timeline, you can go through and,  
4       step by step by step, he gave me the information  
5       that he knew when he had it.

6                        Do you see that?

7                A       Yes.

8                Q       Do you still believe that Chief  
9       Singletary gave you the information that he knew  
10       when he had it?

11              A       No, I do not, because at this time I  
12       did not have the deputy mayor's report.

13              Q       And what was it about the deputy  
14       mayor's report that caused you to change your mind  
15       on this subject?

16              A       The mischaracterization of the --  
17       misrepresentation to Justin; all of the back and  
18       forth with the AG's office; the withholding of the  
19       body-worn camera videos, that back and forth; the  
20       fact that in June his command team had said to him  
21       that I needed to see the video and it had not been  
22       sent over and was sent to corporation counsel and it  
23       was not sent to me; that on April 10, the chief had  
24       sent me a text message that included eight to 10  
25       pages of homicide arrests but didn't include the

1 ME's report.

2 Q Okay. Anything else?

3 A And also the handling of the  
4 protesters, you know. We've had extensive  
5 discussions about how they were treating the  
6 protesters as if they were enemies. And especially  
7 on the night of the 5th, it was absolutely  
8 unbelievable how they treated the protesters despite  
9 my, you know, back and forth in asking them to be  
10 tame.

11 Q Thank you for that expansive answer.  
12 I appreciate it.

13 I just want to tick through a couple  
14 of other items here.

15 And page 22, line 14 a reporter asks  
16 Chief Singletary, But if you told her that, that a  
17 person OD'd while being arrested, did you know that  
18 he was being held down and all the other stuff? And  
19 Chief Singletary said, Yes.

20 Were you surprised at Chief  
21 Singletary's response when you heard this?

22 A I'm sorry, where are you at?

23 Q Sorry. I'm trying to do this quickly.  
24 Lines 14 to 18. Where the reporter asked Chief  
25 Singletary, Did you know that he, Mr. Prude, was

1 being held down and all the other stuff? And Chief  
2 Singletary says, Yes. Did that response surprise  
3 you at the time?

4 A I knew that he had seen the video, so  
5 I thought that he was responding to his recollection  
6 of the video.

7 Q Uh-huh. So you were not surprised  
8 that he knew that -- that he answered the question  
9 that way, correct?

10 A Correct. I wasn't surprised that he  
11 said that he knew that the person was being held  
12 down.

13 Q Okay. And on page 23, a reporter  
14 asked the chief on line 12, But what about the  
15 autopsy? Was she -- referring to you, Mayor  
16 Warren -- informed of the autopsy report that showed  
17 it was a homicide? And Chief Singletary responds,  
18 The mayor -- the mayor said she was not.

19 Do you see that?

20 A Yes.

21 Q Did you understand when Chief  
22 Singletary said that, that he was taking the  
23 position that he had, in fact, informed you of the  
24 medical examiner's finding that the death of  
25 Mr. Prude was a homicide?

1 A Not at that time.

2 Q When did you first discover that he  
3 was taking that position?

4 A When we talked later.

5 Q That day?

6 A No. I think it was the next day.

7 Q On the 7th?

8 A Yes.

9 Q Okay. You're aware that Chief  
10 Singletary asserts that Justin Roj spoke with him  
11 after the press conference that day, right?

12 A Yes.

13 Q Were you aware that day that Mr. Roj  
14 was planning to speak with the chief about what had  
15 occurred at the press conference?

16 A I was aware after he -- after the  
17 press conference he wanted to discuss with the  
18 chief, you know, where we differed at.

19 Q How did you become aware of that? Did  
20 Mr. Roj tell you he wanted to do that?

21 A Yes.

22 Q And what was your reaction to that?

23 A He's the communications director, so I  
24 didn't think that there was an issue.

25 Q Right. And you didn't tell him not to

1 talk to the chief about that, right?

2 A I think that -- I mean, they talk on  
3 issues all the time.

4 Q Right. I -- just for clarity, did you  
5 encourage Mr. Roj to speak with the chief about --

6 A No, I did not. No, I did not  
7 encourage him to speak to the chief.

8 Q Did you tell him not to speak to the  
9 chief on this topic?

10 A No, I did not tell him not to speak to  
11 the chief on this topic.

12 Q Okay. And what did Mr. Roj tell you,  
13 if anything, that he was going to communicate to the  
14 chief?

15 A He did not tell me what he was going  
16 to communicate to the chief.

17 Q Did Mr. Roj seem upset about the way  
18 the press conference had gone?

19 A I -- I don't remember.

20 Q Did Mr. Roj ever fill you in on his  
21 conversation with Chief Singletary that day?

22 A After he spoke to Chief Singletary, he  
23 gave me a call and he said, You and the chief need  
24 to speak because you have very different  
25 understandings of what happened, and you guys need

1 to talk, and if your -- come to some understanding  
2 of where you're going to go from here.

3 Q And what did you understand Mr. Roj to  
4 be communicating when he said that to you?

5 A That I needed to speak to the chief.

6 Q So you did have a meeting with the  
7 chief on September 7, right?

8 A Yes.

9 Q And how was that arranged?

10 A I called him.

11 Q And so you invited him to meet?

12 A Yes. I said that Justin had said that  
13 we needed to talk, and asked him did he want to  
14 talk, and he said yes.

15 Q Okay. And where did you meet?

16 A At a relative's house.

17 Q Okay. In the City of Rochester?

18 A No.

19 Q Okay. Why didn't you meet with the  
20 chief that day at -- in a government office?

21 A I don't know. It was just a  
22 discussion. We were just going to talk, and I think  
23 it was a Sunday.

24 Q And the idea was that you were going  
25 to meet in person, right?



1           A       We could have talked by phone, but he  
2       said he wanted to meet in person.

3           Q       Okay. And who else was present at the  
4       relative's house when you met with Chief Singletary  
5       there?

6           A       My aunt, uncle, and I think my cousin  
7       might have come in later.

8           Q       Were they present for any or all of  
9       the conversation that you had with Chief Singletary?

10          A       They were in the next room.

11          Q       Okay. Did the chief come alone or did  
12       he come with somebody else?

13          A       He came alone.

14          Q       Was he in uniform or in regular street  
15       clothes?

16          A       Street clothes.

17          Q       Okay. And did you text the chief the  
18       address that you wanted him to come to?

19          A       I believe so.

20          Q       Okay. And how long was the meeting  
21       with the chief at your relative's?

22          A       I don't remember. Maybe an hour.

23          Q       Okay. And during that hour that the  
24       two of you were together, what kind of a room was  
25       it? Was it a kitchen, a living room, a dining room?

1           A       A living room.

2           Q       And were there -- was it a room that  
3 could be closed off for privacy, or was it open to  
4 anybody who happened to be in the house?

5           A       It was a room that's open. It didn't  
6 have a door.

7           Q       Okay. And to your understanding, were  
8 the other folks that were present in the house at  
9 the same time, might they have been able to hear  
10 what was going on in the conversation between you  
11 and the chief?

12          A       They could have, yes.

13          Q       Okay. And --

14          A       It's a possibility. I don't know.

15          Q       Well, yeah. That was going to be my  
16 next question. Have you talked to any of those  
17 people about whether they overheard what occurred in  
18 the conversation between you and the chief?

19          A       I did not.

20          Q       Okay. And we'll certainly keep this  
21 part of the record private, but just so I have it,  
22 can you tell me the names of the people who were in  
23 the house during the time that you spoke with the  
24 chief.

25                   MS. COHEN: May I suggest, Andy, that

1 I just give it to you afterwards.

2 MR. CELLI: That's fine.

3 Q So what was your purpose for inviting  
4 the chief to a meeting at your relatives' house?

5 A To get an understanding of where we  
6 disagreed and where we needed to go.

7 Q Okay. And did you accomplish that  
8 task in that conversation?

9 A Yes. We agreed to tell both of our  
10 separate truths.

11 Q Tell me everything you recall about  
12 the meeting that you had with Chief Singletary on  
13 September 7 at your relative's house.

14 A We started off talking about the  
15 difference in the video. The chief asserted that he  
16 believed that he told me about the video, and he  
17 said that I said there was no kicking or no  
18 punching, and that everything -- that there was --  
19 that our officers did no kicking or punching and  
20 there were no issues here, and I asserted that the  
21 video might not have shown kicking or punching or  
22 anything of that nature, but I didn't remember him  
23 saying those exact words. But the video clearly  
24 showed that our officers had placed the spit sock on  
25 this gentleman's head and tightened it and did a

1 plank on his head, and that we had a very different  
2 understanding of what that video showed. And, you  
3 know, I asserted that, You feel like there was  
4 nothing that was done wrong in the video and that  
5 everything was done by the book, and I don't feel  
6 that way.

7 We went on to discuss the -- he said,  
8 Well, people are trying to get me to lie for you.  
9 And I said, I would never ask you to lie for me,  
10 it's just that I disagree with what you said.  
11 Nothing you said raises to me the concern that this  
12 was anything other than a PCP overdose. And every  
13 text message that you sent me led with that, that  
14 it's, you know, the guy on PCP, so how would I know  
15 that this was anything other than routine?

16 He said, Well, I -- he then went on to  
17 say that, you know, that, you know, he had told me  
18 about -- we got into the discussion of whether it  
19 was one call or two calls. Well, prior to that I  
20 had -- I went through my -- as I testified earlier.  
21 I already testified to that, so I don't have to go  
22 into that.

23 So I said, you know, It was one call.  
24 And, you know, he said -- I said, you know, I  
25 wouldn't tell anybody that I saw that video -- that

1 you saw that video and you saw nothing wrong with  
2 it, you know, because that -- you know, basically  
3 that's -- what everybody else sees is different than  
4 what you see.

5 He went on to say that, Well,  
6 everybody -- he was very concerned about council's  
7 investigation, and he said, you know, Well,  
8 everybody's telling me that I should F you and that  
9 I should just quit because I don't need this, and my  
10 integrity and all these things are being called into  
11 question. And I said that I was sorry that that was  
12 what he felt, but we had a difference of opinion on  
13 the video.

14 He then told me that if he quit, that  
15 the entire command staff would quit, and that -- and  
16 I said, Why? And at this time I didn't have the  
17 courtesy of having the deputy mayor's report. So I  
18 just -- I don't know why. And he kept coming back  
19 to this investigation and being concerned about this  
20 investigation. And I said, Well, with the Ricky  
21 Bryant investigation, you know, it -- they just  
22 looked at documents, and so I don't think that it's  
23 a big deal, you know, if -- you know, if we go  
24 through this investigation. And so, you know, we  
25 just go through and we tell the truth. And if my

1 truth is different than your truth, then, you know,  
2 it is what it is.

3                   You know, but just understanding what  
4 is it that you believe? What is it that -- you  
5 know. So he says, Nobody's going to believe that I  
6 didn't tell your administration, you or your  
7 administration nothing about this. And so I said,  
8 What are you talking about? And so he then goes on  
9 to say, Well, I sent Justin Roj a message. And  
10 that's when I learned that there was an email that  
11 had been sent to Justin Roj. And I said, You sent  
12 him an email about this? And he said, Yes. And I  
13 said, Well, he never told me.

14                   He then said, Well, I sent you a text  
15 message. And I said, You sent me a text message?  
16 And he said, Yes. You know, I sent you a text  
17 message informing you of the ME's report. And I  
18 said -- and I said, And I responded? I saw that? I  
19 responded? And he said, No, you didn't respond.  
20 And I said, I couldn't have seen that. Something --  
21 I don't understand.

22                   So I went back and I looked and, you  
23 know, I did see the text message had been there.

24                   Q       You looked in the moment -- I don't  
25 mean to interrupt, but you looked right then and

1 there, or you're saying later on you looked?

2 A No. I looked in the moment, and I  
3 said -- I looked in the moment and I did see the  
4 text message that said that, Mayor, give me a call.  
5 The ME's report on the guy with PCP is in. And I  
6 said, I didn't see that. I said, I don't recall.  
7 And I said, I didn't respond. I don't remember  
8 seeing that.

9 He goes on to say -- I said, Well, did  
10 I call you? Did I -- because I'm perplexed, because  
11 I don't remember this at all. And so he said, No,  
12 you never called me. And I said, Well, Why didn't  
13 you call me? You know, this is major. And he said,  
14 Well, I told you at the elevator. And I said, Told  
15 me what at the elevator? And so he goes on to  
16 assert that after a press conference on homicide  
17 that he told me this -- he made this revelation that  
18 the ME had come back and said it was a homicide.  
19 And I said, I don't remember that. And he said,  
20 Well, I did, and I have a witness that knows that I  
21 told you. And I said, Well, I really don't remember  
22 having that discussion. I said, And that's not  
23 something you should tell me at the elevator. I  
24 said, you know, I don't remember that.

25 And he went on to say that -- you

1 know, to continue to assert that he said that at the  
2 elevator. And I said, Well, if that's the case,  
3 then, you know, when you testify about this, you  
4 should make sure you put it into context, that we  
5 were at the elevator, that we were talking about  
6 homicides, that we were whatever, because I don't  
7 ever remember having this discussion.

8 And he went back to, you know, that  
9 he's just upset with James, he's upset about this  
10 investigation, and what will come out of this  
11 investigation, and how it's going to be run. And I  
12 said, You know, from based on the past  
13 investigation, this is what I know, and that's it.  
14 You know, that they looked at paperwork and, you  
15 know.

16 He then said, Oh, well, I should --  
17 you know, people are telling me that I just need to  
18 run for mayor. And I said, You want to run for  
19 mayor? I said, well, Like for -- like, what's going  
20 on? And so he said, Well, do you want me to resign?  
21 Do you want me to leave? I said, No. I believe  
22 that we can get through this. You know, I know that  
23 it's tough. I'm not asking you to leave. I'm not  
24 asking you to lie for me. You know, I think that we  
25 fundamentally believe that this -- that the video



1 shows something -- you know, we disagree on what the  
2 video shows. I don't remember -- I don't remember  
3 you saying anything to me at the elevator, but I  
4 recognize that this is tough, but we love this city,  
5 we're committed to this city, and we should move  
6 forward together. And, you know, that I did not  
7 want him to resign; I wanted him to stay. And, you  
8 know, he kept coming back to the fact that he was  
9 concerned about this investigation.

10 Now, at that point in time I didn't  
11 have the knowledge of what -- the deputy mayor's  
12 report, so I didn't have anything. I'm just going  
13 on what he's telling me. And he's like, I have my  
14 20 years in. I don't need this, I don't have to  
15 deal with this. And I said, you know, You can tell  
16 your folks that our disagreement, really, is on what  
17 this video shows. You know, we definitely disagree  
18 on what this fundamentally shows, and that they  
19 shouldn't quit over this. We can get through this,  
20 like.

21 Again, it came back to the  
22 investigation and him being concerned about the  
23 investigation. The council president I think ended  
24 up calling me about something and I asked her about  
25 the investigation. I can't remember -- I just said,

1 Well, I'm here with the chief. You know, can you  
2 tell me about the investigation. What is it? And  
3 she said, You know, you'll just be sworn, you know,  
4 sworn testimony and all of that. And I can't  
5 remember if, you know -- exactly what she said, but  
6 basically that we would go under oath and the  
7 documents and things like that. And it's an  
8 independent investigation. And I said, Okay. And I  
9 relayed that to him.

10 And I also -- you know, we talked  
11 about, you know, personal cell phones and stuff like  
12 that, and I said, You know, in the Ricky Bryant case  
13 they weren't a part of the investigation, so I don't  
14 think that they would be a part of this. And that  
15 was basically about it.

16 But I didn't have a problem with  
17 testifying or saying anything to this investigation  
18 because, you know, to me I just know my truth, and  
19 my truth is that I fundamentally believed all this  
20 time that this was a PCP overdose and, you know, a  
21 routine arrest, a death in custody, until I got the  
22 documents, and then I realized why he was very  
23 concerned about this investigation.

24 Q Thank you for that extensive answer.  
25 And I'm obviously going to ask a few questions about

1 it.

2 I guess my first question is, did you  
3 have reason to believe that Chief Singletary might  
4 be audio-taping this conversation?

5 A I don't know.

6 Q Did that cross your mind before you  
7 met with him?

8 A No. I don't think there was anything  
9 in the conversation or that I was going to say that  
10 couldn't be publicly released.

11 Q I'm not suggesting there was. I was  
12 just wondering if that crossed your mind.

13 I take it you didn't tape him during  
14 this conversation, right?

15 A No, I did not.

16 Q Okay. You mentioned that the chief, a  
17 few different occasions, expressed concern about  
18 this investigation, this council investigation.  
19 What did he say about that? What was your  
20 understanding of specifically of the nature of his  
21 concern?

22 A He was just like, This council  
23 investigation, what is it? You know, I don't have  
24 time for that. You know -- you know, really just  
25 annoyed by the whole thing.

1           Q       Okay.  And who first raised the issue  
2       of whether personal cell phones would be subject to  
3       review as part of this investigation, was that you  
4       or Chief Singletary?

5           A       I don't remember.

6           Q       Tell me, what was the Ricky Bryant  
7       investigation that you referred to?

8           A       So Ricky Bryant was a young man that  
9       had been attacked on our -- that our officers had  
10      kneed in the face and they had broke his orbital  
11      bone, and council had did an independent  
12      investigation and subpoenaed records on that.

13          Q       Got it.

14                   Who conducted that investigation?

15          A       I'm not sure.

16          Q       Was it an outside lawyer, sort of like  
17      my firm?

18          A       No, I don't -- I don't remember.  I  
19      don't remember.  I know that they just requested  
20      documents and things like that.  So, like, they  
21      didn't request personal information, personal cell  
22      phones.

23          Q       Was Chief Singletary criticized or --  
24      as part of the Ricky Bryant investigation?

25          A       No, he wasn't chief.

1 Q Was -- he was at the department?

2 A Yes.

3 Q Did he have to respond to any request  
4 for information relating to the Ricky Bryant matter?

5 A I don't remember.

6 Q You testified that the chief mentioned  
7 that he had a witness to the conversation that  
8 occurred near the elevator at City Hall, right?

9 A Yes.

10 Q Did he tell you who the witness was?

11 A I don't remember him explicitly saying  
12 who it was. He just said that he had a witness.

13 Q Did you -- in the conversation with  
14 Chief Singletary, did you deny, flat-out deny to him  
15 that he had ever told you the results of the medical  
16 examiner's examination?

17 A I told -- I'm sorry. I told him that  
18 I did not recall that conversation.

19 Q Okay. Right. I guess that was my  
20 question. Did you say you didn't remember one way  
21 or the other? Or did you say, You absolutely never  
22 told me that?

23 A I said, I don't remember having that  
24 conversation.

25 Q When you reviewed the text message

1 from the chief during the meeting, what text message  
2 was that?

3 A That was the text message on April 10  
4 where it says, The gentleman on PCP that -- give me  
5 a call. The ME came back with a report from the  
6 gentleman on PCP.

7 Q Got it.

8 And what else was said, if there was  
9 anything more, about the fact that the chief had  
10 sent an email to Justin Roj disclosing the outcome  
11 of the medical examiner's investigation?

12 A He just indicated that he had sent an  
13 email to Justin telling him and letting -- informing  
14 him of the ME's report. And I think that he said  
15 that he attached the ME's report, and that also --  
16 he also indicated that he had -- you know, that the  
17 law department was involved in this situation  
18 throughout the case.

19 Q So did you understand Chief Singletary  
20 to be saying that since he had notified Justin Roj  
21 of the outcome of the medical examiner's report, he  
22 believed that you also were aware of it?

23 A No.

24 Q So what was your understanding of the  
25 relevance of his having informed Justin Roj about

1 the medical examiner's determination to this --

2 A He was saying that no one would  
3 believe that -- nobody in my administration knew  
4 about this from April to August. And at that time,  
5 that was my understanding. I didn't know about the  
6 April email. I didn't know about the exchanges with  
7 law. I didn't -- well, I knew about the timeline  
8 and things like that by then. But I'm just saying  
9 that I didn't know the extent to the discussions  
10 that were going back and forth with the police  
11 department and the law department that this email  
12 had been sent.

13 Q Did Chief Singletary say anything to  
14 you about specifically who at the law department had  
15 been informed of the circumstances of the Prude  
16 arrest?

17 A He said that corporation counsel, that  
18 he had emailed corporation counsel.

19 Q Mr. Curtin?

20 A Yes.

21 Q Did he mention Patrick Beath at all?

22 A I can't remember.

23 Q Okay. Why did you tell Chief  
24 Singletary that if he was going to talk about the  
25 conversation that he claimed to remember at the

1 elevator, that he should put it in context by saying  
2 that it occurred at an elevator?

3 A I was saying to him to tell the full  
4 story about when it occurred, that it occurred at  
5 the elevator, and about a homicide, because to me,  
6 this conversation never happened, and I don't  
7 remember it -- or I don't remember it. So I wanted  
8 people to know the truth, that, you know, this is  
9 what happened.

10 Q When you say that he expressed upset  
11 at James, that's James Smith?

12 A Yes.

13 Q What did he say about that?

14 A He just said that he was upset because  
15 James wanted him fired.

16 Q And that was true, right?

17 A Yes.

18 Q And do you know how he knew that?

19 A No, I don't.

20 Q Okay. Did you tell him it was true or  
21 say it wasn't true? Or what did you say in response  
22 to that?

23 A I don't think I said anything to him  
24 in response to that. I just assured him that I  
25 believed that we could move forward together and



1 that, you know, that we could go through the  
2 investigation, we could, you know, move forward  
3 together.

4 Q Other than on this occasion, had you  
5 ever heard in your political life, even if  
6 informally, that the chief was somebody who was  
7 considering running for mayor at some point?

8 A No.

9 Q Have you ever heard of that since?

10 A I heard that when I received the  
11 Notice of Claim, that there had been a meeting with  
12 some community leaders that asked him to run, and  
13 that they believed that that was the reason why he  
14 filed this Notice of Claim.

15 Q Who were the community leaders?

16 A I did not have specific names, but I  
17 believe -- I do not -- well, let me not say I don't  
18 have specific names. Members of the LGBTQ  
19 community, I believe the head of the chamber, and  
20 maybe some council members.

21 Q Which council members?

22 A Mitch Gruber and Malik Evans.

23 Q And did you ever find out if this was  
24 true, that these community leaders that you're  
25 talking about have encouraged Chief Singletary to

1 run for mayor?

2 A No, I did not.

3 Q Okay. And when you learned this, was  
4 it your understanding that the chief was being  
5 encouraged to run for mayor against you or at some  
6 future election?

7 A Against me.

8 Q Okay. Have you done anything to  
9 investigate whether the chief would be a viable  
10 candidate for Mayor?

11 A No.

12 Q Okay. You mentioned that a couple  
13 times the chief said words to the effect, I'm not  
14 going to lie, or, I'm not going to tell a lie,  
15 right?

16 A He said that at the beginning when he  
17 indicated that he felt that some people were trying  
18 to -- he asserted that some people were trying to  
19 get him to lie. And I said, Did they tell you that,  
20 that -- they told you that? And he said, No. And I  
21 said, Well, I would never ask you to lie for me.

22 Q Did he tell you who he believed was  
23 trying to encourage him to lie?

24 A I don't remember. He just said  
25 people.

1 Q Did he tell you in what way he was  
2 being encouraged to lie?

3 A No.

4 Q Did he express to you or articulate to  
5 you where the difference of recollection was as  
6 between you and he such that he was being encouraged  
7 to lie?

8 A In the video and what was shown on the  
9 video.

10 Q What do you mean by that?

11 A As I testified earlier, we  
12 fundamentally disagree with what the video shows.  
13 And so in the video is where he, you know, he  
14 said -- what I took away from what he said to me.

15 Q Did you apologize to Chief Singletary  
16 at this meeting?

17 A Apologized if he thought that his  
18 integrity was being questioned or anything like  
19 that. I don't believe that I apologized to him  
20 explicitly about anything -- apologize if you feel  
21 that way. I'm sorry if you feel that way, but...

22 Q So your recollection is that what you  
23 said was, I'm sorry if you feel that way, not, I'm  
24 sorry, like, without any conditions; is that fair?

25 A Correct. I might have said, you know,

1 I signed up for it. I'm sorry that you're going  
2 through this, meaning with people in the community  
3 calling for your resignation and all of that.  
4 I'm -- I feel -- I feel bad that people were going  
5 through this.

6 Q Did you tell him that it wasn't your  
7 intent to destroy his character, integrity, or  
8 reputation?

9 A I didn't destroy his character or  
10 reputation. That was his interpretation.

11 Q Right. And my question is did you  
12 tell him, That wasn't my intent, I never intended to  
13 do that?

14 A If he felt that way. I could have  
15 said, you know, If you feel that way, then I'm sorry  
16 that you feel that way, but that's not my intent.

17 Q Right.

18 Did you say words to the effect, I  
19 shouldn't have listened to them fools?

20 A I don't remember that.

21 Q Uh-huh.

22 Did you tell the chief during this  
23 meeting that he had failed to disclose to you that  
24 an officer had used force on Mr. Prude?

25 A I specifically said that, We

1 fundamentally disagree with what that video shows,  
2 and I reiterated what I believe the video shows.

3 Q Did you tell him that you  
4 fundamentally disagreed about what Mr. -- what Chief  
5 Singletary told you when you spoke to him on March  
6 23?

7 A Yes. I don't remember him talking  
8 about punching or kicking or restraining or doing  
9 any of that. I don't -- I don't remember anything  
10 that would alarm me that this was anything other  
11 than a routine arrest.

12 Q And he told you in the meeting on  
13 September 7, Hey, I told you that there was no  
14 punching or kicking, did you say, You never told me  
15 that?

16 A I probably did say that.

17 Q Did you ask Chief Singletary not to  
18 mention in this investigation that you had had  
19 knowledge that the police officers had been  
20 involved, physically involved, with Mr. Prude at the  
21 time he went unconscious?

22 A I don't understand that question.

23 Q Let me be more specific.

24 In his Notice of Claim, Chief  
25 Singletary says that you, quote, Nonetheless

1 requested that during my testimony in the city  
2 council's investigation, that you didn't want me --  
3 him -- to mention her knowledge of the police  
4 officers' physical involvement with Daniel Prude on  
5 March 23 on Jefferson Avenue.

6 You've read that before, correct?

7 A I said that I don't recall that. I  
8 don't recall that discussion or him telling me  
9 anything about that. And that he shouldn't -- I  
10 said that you -- you know, I wouldn't say that -- I  
11 wouldn't say that you saw that video and you saw  
12 nothing wrong.

13 Q I understand.

14 Let me ask a more narrow question.  
15 When you met with him on the 7th, did you ask him  
16 that during his testimony in this investigation that  
17 he not mention that you had knowledge that the  
18 police officers had had physical involvement with  
19 Daniel Prude on March 23?

20 A No, I do not believe that I said that.  
21 I said to him that I do not recall him saying  
22 anything about punching or kicking or anything like  
23 that.

24 Q Did you ask Chief Singletary in this  
25 meeting on the 7th to omit the specifics of

1 conversations that you and he had had when you had  
2 discussed with him the details of the medical  
3 examiner's report?

4 A No, I do not. I told him to put it  
5 into context.

6 Q Of the fact that it happened by an  
7 elevator?

8 A Happened at an elevator after a press  
9 conference on homicide.

10 Q Right. But you did not ask him to  
11 omit the specifics of the conversation -- of a  
12 conversation that you had with him about the details  
13 of the medical examiner's report, right?

14 A No, I did not. Just as I previously  
15 testified.

16 Q Did you tell Chief Singletary on this  
17 occasion that you wanted him to testify that the  
18 medical examiner's report was only mentioned to you  
19 in passing and that he should not have told you  
20 about it in passing by an elevator?

21 A I told him to put it into context in  
22 that that's what he did, that's what he said he did,  
23 that he told me at an elevator in passing.

24 Q Okay. Did you ask him to testify that  
25 he gave you the medical examiner's report orally,

1 report of what the medical examiner had found, only  
2 in passing?

3 A It's as I've previously said, I told  
4 him to put the matter into context when he testified  
5 to it, but to be truthful, to tell his truth. I  
6 don't remember this conversation ever happening, and  
7 so if you're going to say that it happened, then put  
8 it into context.

9 Q Did you -- in this conversation on the  
10 7th, did you tell Chief Singletary that he had  
11 failed to disclose to you the officers' use of  
12 force?

13 A It's as I previously testified on what  
14 I said.

15 Q Well, I just want to ask this clearly,  
16 because in his Notice of Claim he says, The Mayor  
17 misstated that I failed to disclose to her the  
18 officers' use of force.

19 Do you remember communicating that to  
20 him on the 7th?

21 A He testified, as I said earlier,  
22 that -- not testified. I'm sorry. He stated that  
23 he told me that there was no punching, no kicking,  
24 and I don't remember that being the case. I  
25 remember him clearly saying -- I remember him



1 clearly representing that this was a routine arrest,  
2 that there was nothing out of the normal, that  
3 nothing should alarm me that anything was done wrong  
4 here. And he and I fundamentally disagree with what  
5 this arrest shows.

6 Q During the meeting that you had with  
7 Chief Singletary, did you ask him to recite for you  
8 how he was going to testify in this city council  
9 investigation?

10 A I don't recall that. At all.

11 Q Are you saying it didn't happen, or  
12 you just don't remember one way or the other?

13 A I mean, we talked about getting -- you  
14 know, we talked about really where we disagreed at,  
15 and his understanding of, you know, his truth, and  
16 that was basically the whole elevator situation.  
17 And I said to him, you know, Well, what are you  
18 going to say? And, you know, that's when he said --  
19 and that's when I said, Well, I asked you to put  
20 that into context.

21 Q Okay. Did Chief Singletary during  
22 this meeting say, You're throwing me under the bus  
23 for no reason, or words to that effect?

24 A I don't remember. He was very upset  
25 because his truth was different than mine as it

1 pertains to what the video showed. And, again, he  
2 indicated the -- you know, the email to Justin in  
3 the law department and the text message to me. At  
4 the time I didn't have the deputy mayor's report, so  
5 I'm taking everything that he's saying at -- you  
6 know, as his understanding and his truth.

7 Q When you make this distinction between  
8 his truth and your truth, what do you mean by that?

9 A The chief fundamentally believed that  
10 nothing is wrong with that video, and so every  
11 action that he made after that shows that. And I  
12 disagree. I believe that something is fundamentally  
13 wrong with the video. And had he -- had he believed  
14 that something was fundamentally wrong with the  
15 video, on March 23 he would have said to me, Mayor,  
16 you need to come and see this video; it's not good.

17 Q And how do you know that?

18 A How do I know that --

19 Q How do you know that if he had  
20 believed there was something on the video that he  
21 felt was inappropriate, he would have said, Mayor,  
22 you need to see this?

23 A Because in the past he has.

24 Q Okay. Can you give some examples of  
25 that.

1           A        You have the incident on -- there was  
2   a -- I believe an incident early part of sometime  
3   last year where I might have called him on an  
4   incident and when he goes and reviews it, he would  
5   say, Oh, we looked at that and there's a problem  
6   here. And as you saw with the email that you had  
7   showed earlier, that was routine. If he saw a  
8   problem, he didn't have a problem with disciplining  
9   the officers or anything like that.

10           Q        Did you notify anybody about the  
11   chief's threat that he was going to retire and the  
12   entire command staff was going to retire at the same  
13   time?

14           A        No, because when he left, that wasn't  
15   the case. He was going to -- we were going to go  
16   through the process -- we were going to go through  
17   the process and we were going to go through this  
18   together; we both love this city, and that was what  
19   we were going to do.

20           Q        Well, how was the meeting -- how did  
21   the meeting conclude with Chief Singletary that day?  
22   Where was it left?

23           A        It was left that we were going to go  
24   through the process; you know, that he was going to  
25   stay on as chief, that I didn't want him to retire,

1 that I believed that he was the right person to work  
2 through this with me; that we would fully cooperate  
3 with the investigation and, you know, go on and  
4 represent our city.

5 Q So when the chief announced the next  
6 day that he was planning to retire, were you  
7 surprised?

8 A I was hurt.

9 Q Well, that was contrary to the  
10 impression that you had been left with when you  
11 ended the conversation on the 7th, right?

12 A Yes.

13 Q And did you try to speak to the chief  
14 at that point?

15 A No. He had called me -- he did the  
16 media release and then he called me to say, I've  
17 done this release.

18 Q And what was -- tell us about that  
19 conversation.

20 A He just said that he is tired of city  
21 council, tired of being the bad guy, tired of the  
22 protesters calling for his resignation. He didn't  
23 need that. He had his 20 years and he was leaving.  
24 And he also said, This is not about you, Mayor. You  
25 know, he said, This is not about you. I just don't,

1 you know -- you know, I respect you and I don't --  
2 but, you know, we -- we're just -- at this time  
3 there was many clashes with the protesters that I  
4 think -- that I interpreted had got to him.

5 Q Did he -- when you had this call with  
6 him, did he explain to you why he was tired of the  
7 city council?

8 A Because city council had instituted  
9 these daily briefs on the protests. City council  
10 was questioning how he was handling the protests  
11 and, you know, was questioning his leadership, as  
12 well as the -- some council members; let me say  
13 that. Some. And he was just tired of it all.

14 Q We're going to go through a couple  
15 more documents and then we'll be done. I appreciate  
16 your patience very much, Mayor.

17 Let me screen share with you and we  
18 will look at what we've marked as Warren Exhibit 15.  
19 This is a transcript of a WHAM newscast on September  
20 8. Ginny Ryan is the correspondent. And she's  
21 reporting on page 2, line 10, Chief La'Ron  
22 Singletary and the entire command staff blindsiding  
23 city leaders and leaving their positions. And  
24 there's a video clip of you where you say, I know  
25 there are many questions, but this just occurred,

1 and honestly, I do not have the answers today.

2 Do you see that?

3 A Yes.

4 Q Weren't you aware, when you gave that  
5 statement in the wake of the chief's resignation and  
6 the resignation of the command staff, of what his  
7 reasons were for resigning?

8 A What do you mean?

9 Q When you made -- I mean, I'm not sure  
10 when in time you made this remark: There are many  
11 questions, this just occurred, and honestly I do not  
12 have the answers today. As of that point were you  
13 not aware of the reasons that Chief Singletary had  
14 given for resigning?

15 A In his resignation letter?

16 Q From all sources, from your long  
17 conversations with him and from the call that you  
18 got from him as well.

19 A Yes, I was aware. But this was about  
20 who would lead the police department and where would  
21 we go from here and all of that. I wasn't prepared  
22 to answer those types of questions. It wasn't about  
23 why he was resigning.

24 Q Okay. Let's go to Exhibit 17. This  
25 is a transcript that we created of the council

1 briefing that you gave on September 9. And I'm  
2 going to focus your attention on page 3, line 15  
3 where you say, I also want to take a moment to  
4 apologize to city council, in that the eight members  
5 of the city council and council president, because  
6 you were not fully briefed on this matter at any  
7 point in time before the video came out, fully  
8 briefed the eight members of council, and so I  
9 definitely want to apologize to you all and I will  
10 answer what questions I can.

11 Do you see that?

12 A Yeah.

13 Q Why did you apologize for the fact  
14 that city council members had not been briefed on  
15 the Prude matter?

16 A Courtesy.

17 Q Let me ask a different question.  
18 Having informed, as you've testified, Council  
19 President Scott about the Prude matter in August,  
20 did you expect her to have let people know on the  
21 council as to what had happened with Mr. Prude?

22 A I would have expected it, but I  
23 couldn't remember whether I said to keep it  
24 confidential from -- that we couldn't say anything  
25 to the public or that, you know that, if she told

1 council that it had to be kept confidential. So I  
2 didn't know. And so I just out of courtesy said  
3 that.

4 Q Okay. When you spoke to Loretta Scott  
5 sometime in the middle part of August about this  
6 matter, did you tell her that you'd been given  
7 advice by the corporation counsel that because this  
8 matter was subject to Executive Order 147, that the  
9 City was not permitted to make public comments about  
10 it?

11 A I previously testified to that.

12 Q I'm going to take you to Exhibit 23.  
13 I want to show you this exchange between you and --  
14 well, I'll ask you, is this exchange on September 9  
15 at 1:49 p.m. going up until 2:06 p.m., is that  
16 between you and Council President Scott?

17 A Yes.

18 Q And do you recall how this exchange  
19 began?

20 A Yes. The council president was on  
21 Evan Dawson, and she had made a claim that I did not  
22 tell her that there was a video, and that her  
23 understanding was that Daniel Prude died of PCP  
24 overdose.

25 Q And Evan Dawson is a radio program; is



1 that correct?

2 A Yes.

3 Q And were you listening to her as she  
4 was being interviewed on radio in real time?

5 A No. Someone -- I believe our  
6 communications director -- somebody saw a Tweet that  
7 had been put out.

8 Q Got it. And then you texted her to  
9 ask about it; is that correct?

10 A I texted her to say -- I texted her  
11 that -- I believe I texted her the Tweet and asked  
12 her to clarify the record.

13 Q Got it.

14 And her response was that she, other  
15 than the date, felt that what she said on the radio  
16 program was her recollection of the conversation you  
17 two had had?

18 A Yes. However, previously that wasn't  
19 the case.

20 Q I'm sorry, I didn't catch that. What  
21 do you mean by that?

22 A So on September 2 she did not indicate  
23 that she was not fully informed. She just asked me  
24 did I tell her not to say anything. She did not say  
25 that I did not tell her what I told BJ that I told

1 her.

2 Q Got it. So that's a reference to what  
3 we've marked as Warren Exhibit 25, this text?

4 A Yes. And that's at 10:11 after I had  
5 already told -- text Alex what I had told -- what BJ  
6 was asking for.

7 Q Got it.

8 Incidentally, these messages below  
9 that, Friday, September 4 at 12:55 and Friday the  
10 4th at 7:27, Give me a call, please. Give me a  
11 call, please, do you know who those are from?

12 A Those are from her to me.

13 Q Okay. And did you, in fact, speak to  
14 her on Friday the 4th or Saturday the 5th?

15 A Whenever she told me to call, I would  
16 call, so yes.

17 Q Okay. And what -- so do you think you  
18 spoke to her on two occasions on the 4th, once after  
19 the text at 12:55 and once after the text at 7:27?

20 A Probably.

21 Q Do you recall anything about either of  
22 those calls?

23 A No. I looked to see what that text  
24 message there says, because it seems like it was a  
25 forward, so it must have been on this. And I can

1 look at my cell phone now and see --

2 Q Yeah, I was wondering, the tap to  
3 download, can you check and see what that shows.

4 A It's a message from Council Member  
5 Mitch Gruber. It's a letter that Council Member  
6 Mitch Gruber wrote about council should be doing an  
7 independent investigation.

8 Q Got it.

9 And that's something that Council  
10 President Scott forwarded to you on Friday evening  
11 the 4th?

12 A Yes.

13 Q And did you have a conversation around  
14 that forward at that time?

15 A Yes.

16 Q And what do you recall about that?

17 A That she was thinking about what they  
18 had asked. What he had asked.

19 Q Uh-huh. And what was your response to  
20 that?

21 A I said okay.

22 Q Okay. I want to place before you what  
23 we previously marked as Warren 20, which is a  
24 transcript of an interview that you gave to Adam  
25 Chodak at WROC.

1 A Yes.

2 Q It's very hard to print out, so just  
3 so the record's clear, this is Warren 417 to 424.  
4 We had a lot of trouble getting this thing to print  
5 properly.

6 Do you recall giving an interview to  
7 Mr. Chodak on September 16, correct?

8 A Yes.

9 Q And in that interview -- in that  
10 interview you were asked by Mr. Chodak here on page  
11 419, So you don't remember anyone saying the word  
12 "homicide" to you before August 4? And your  
13 response was, I assure you, Adam, this whole  
14 situation I was not given the correct information.

15 Do you see that?

16 A Yes.

17 Q And am I correct in saying that when  
18 you answered that question, you were not denying  
19 that someone had used the word "homicide" in the  
20 context of Prude; you were just indicating that you  
21 didn't recall that?

22 A As I previously testified, I don't  
23 recall that conversation happening.

24 Q I take you to page 422. Up here at  
25 the top there's a discussion of you and Chief

1 Singletary, your backgrounds, your work together,  
2 and basically you're saying here, quote, All the  
3 times I could have been contacted.

4 That's a reference to you were  
5 communicating there that you could have been told  
6 the details about the Prude arrest; is that correct?

7 A What was happening around the Prude  
8 situation, not the details of the Prude arrest.  
9 Remember, the chief called me on the 23rd to tell me  
10 about the arrest, so I'm talking about the details  
11 from the deputy mayor's report.

12 Q Okay. And you go on to say, All the  
13 time his own people said, Tell the Mayor.

14 When you say "his own people," are you  
15 referring to Chief Singletary?

16 A Yes.

17 Q And then you go on to say, And knowing  
18 what I knew and what I was told, that this was a PCP  
19 overdose, I just couldn't let it stand because it  
20 was a clear deception along the way, and information  
21 that could have been shared but was not shared.

22 Do you see that?

23 A Yes.

24 Q Who was responsible for the clear  
25 deception that you're referring to there?

1           A       Based on the deputy mayor's report, I  
2 felt like the chief had not had -- I classify as I  
3 told you but I didn't tell you.

4           Q       What do you mean by that?

5           A       So if you take example on April 10,  
6 the text message, right? Right before that text  
7 message is eight messages, forms that were  
8 emailed -- that were text to me showing the homicide  
9 arrest and talking in great detail about homicide.  
10 And right after that, even though the ME's report  
11 had came in I believe a day or two before that, he  
12 didn't mention it. The same way that he attached  
13 those documents to that text message, he could have  
14 attached the ME's report, and he didn't. The same  
15 way that when he text -- sent the information to  
16 Justin, he attached the Major Crimes report and all  
17 of that, but didn't attach the ME's report.

18                       So those are willful -- to me  
19 that's -- I don't know why you do that except for  
20 I'm trying to tell you but not tell you. I -- you  
21 know.

22           Q       You believe as you sit here that Chief  
23 Singletary intentionally kept from you details about  
24 the Prude arrest?

25           A       You'd have to ask him, but I can just

1 tell you that -- on his intent. I'm not going to  
2 talk about somebody's intent. I can just tell you  
3 that when I review the information on what I was  
4 told, what I understood, how things had been relayed  
5 to me, it was not in a context of, I really want --  
6 I really believe that this is a problem for our  
7 city.

8 Q Just so I'm clear, what you told Adam  
9 Chodak on September 16 is, It's not about what was  
10 said, it's about what wasn't said. So I take -- I'm  
11 sorry. I'm reading the wrong thing.

12 Of all the things that were done, I  
13 could only surmise that it was done on purpose so  
14 that I would not know.

15 That's a reference to all the things  
16 that Chief Singletary did and didn't do about the  
17 Prude arrest, right?

18 A That -- yes.

19 Q Throughout the day, Mayor, you  
20 referenced the number of times the managerial report  
21 that Deputy Mayor Smith put together. I want to put  
22 that up on the screen for you. And as you know,  
23 this is a document that is -- 10 pages long and it  
24 has a lengthy -- it has a fairly extensive appendix  
25 of documents that were gathered by the deputy mayor.

1 You know that, right?

2 A Yes.

3 Q And you testified that conclusions  
4 from the deputy mayor caused you to conclude that  
5 Chief Singletary needed to be terminated from his  
6 employment as chief, right?

7 A Yes.

8 Q So I have the report in front of you  
9 now. Can you tell me what it is from the report  
10 that led you to terminate the chief?

11 A The report is not up.

12 Q Oh, I'm sorry. I keep doing that.  
13 Hold on. You probably -- you might want to look at  
14 your own copy anyways because it's kind of long.

15 I'm just asking you to walk me through  
16 the report and tell me what conclusions you believe  
17 led you to the decision to terminate Chief  
18 Singletary.

19 A The first is the text message -- the  
20 fact that the ME's report came in, I believe -- let  
21 me go to the ME's report. Do we know what page  
22 that's on?

23 Q Well, are you looking for the  
24 appendices or just the report?

25 A The ME's report was received days



1 before the chief even text me. The ME's preliminary  
2 report was, I believe, received days before the  
3 chief text me.

4 Q Let me direct you to page 4 where the  
5 managerial report says, I could find no written  
6 record that the chief of police informed you or  
7 anyone in the Office of the Mayor of the MHA and  
8 subsequent death of Mr. Prude until April 10, the  
9 day the report was ruled a homicide.

10 Do you see that?

11 A Yes.

12 Q Does that refresh your recollection  
13 that, at least according to this report, Mr. Prude's  
14 death was ruled a homicide on April 10, and that's  
15 when there were communications with Mr. Roj and an  
16 email to you about the medical examiner's  
17 conclusions?

18 A Yes. It's saying that the first  
19 proactive email was on April 10 to the  
20 communications director where he informs of -- that  
21 the medical examiner office notified the ruling. It  
22 was sent eight hours after the ME's office notified  
23 the RPD of the ruling. So I would think that I  
24 would be contacted prior to that.

25 The video had been sent to the union

1 on April 2 or -- April 2, prior to the -- way before  
2 I saw it on August 4, so I don't see why I wasn't  
3 given the union video.

4 The report that the chief actually  
5 said to Justin is not accurate. It is actually the  
6 medical examiner does not state in any way that  
7 Mr. Prude was resisting arrest. And Mr. Prude  
8 wasn't resisting arrest at all.

9 The chief stated to me that the Major  
10 Crimes -- that there had not been a report that --  
11 concluding that the officers had did nothing wrong,  
12 and that was inaccurate. Major Crimes had made a  
13 determination. And this email to Justin included  
14 that report supporting the claim that the chief  
15 believed that nothing was done wrong here, and that  
16 this, in their minds, had been a routine arrest and  
17 everything was done by the book.

18 His assertion from the very beginning  
19 that nothing was wrong with this video and what was  
20 contained in it, these reports, based on what I  
21 learned from them, show something very different.

22 Q I appreciate the expansive answer.

23 What I want to understand is are all  
24 the things you just testified about things you  
25 learned for the first time from the managerial

1 report?

2 A Collectively, yes.

3 Q Okay. And those are the grounds upon  
4 which you decided to terminate Chief Singletary as  
5 the chief, right?

6 A Yes.

7 Q Okay. So I realize something. It's a  
8 bit of an anomaly, but attached to this exhibit at  
9 the back is a timeline, which I'm going to represent  
10 to you was not part of this report, the managerial  
11 report. I think this is just a mistake on my  
12 office's part. But I'd like you to look for a  
13 moment. We were looking for this earlier, at the  
14 pages marked Warren 159, 160, all the way up to 163.  
15 I'm not going to ask a lot of detailed questions.  
16 But is this the timeline that was prepared for  
17 responding to media requests for information about  
18 the Prude matter?

19 A I don't remember.

20 Q Just to bring you back to where we  
21 were, you testified earlier that there were  
22 timelines, one was from the law department and  
23 another one that was prepared for media, to respond  
24 to media inquiries. And I was wondering if these  
25 pages, 159 to 63, represent that second timeline

1 that you were referring to?

2 A It possibly do [verbatim], but I don't  
3 remember.

4 MR. CELLI: Okay. If you will give me  
5 five minutes, I think I'm done. But I  
6 want to just check with my colleagues and  
7 make sure I didn't miss anything. And  
8 I'll jump right back, okay?

9 MS. COHEN: Okay.

10 MR. CELLI: Thank you.

11 (Whereupon, a recess was taken  
12 between 6:33 and 6:38 p.m.)

13 BY MR. CELLI:

14 Q I do have a couple more questions, but  
15 it won't be very much.

16 Can you hear me, Mayor Warren?

17 A Yes.

18 Q Okay. So I put back up on the screen  
19 what we've marked as Warren 23R. And I want to  
20 direct your attention to some entries down here,  
21 September 13, beginning at 7:13 p.m. on September  
22 13. These are text exchanges between you and Deputy  
23 Mayor Smith, right?

24 A Yes.

25 Q And what are you talking about? What

1 are you discussing in these text messages, the ones  
2 that start at 7:13, and, sorry, go over to about  
3 7:30?

4 A He had delivered to me his draft  
5 report that he was going to be releasing the next  
6 day and wanted me to go through it to make sure the  
7 timeline was accurate.

8 Q Got it.

9 A And --

10 Q Sorry. I didn't mean to interrupt  
11 you.

12 A -- that the timeline and the  
13 recommendations were something that were accurate  
14 and that I knew about it before he released it.

15 Q Okay. And one of the things that you  
16 talk about here is adding to the timeline that you  
17 briefed Council President Scott on the Prude matter,  
18 right?

19 A Correct.

20 Q And he asked you where you wanted  
21 that, and you said that that happened on August 7,  
22 2020?

23 A Yes.

24 Q And who is Yantise?

25 A Yantise is my sister.

1           Q       And had you shared with your sister  
2 the draft managerial review that the deputy mayor  
3 had prepared for you?

4           A       Not the entire document; the  
5 interdepartmental correspondence, because she's  
6 really good at punctuation and periods and things  
7 like that. And at this time our communications  
8 director was not privy to this. So we just wanted  
9 to make sure that those technical things were taken  
10 care of and it flowed correctly.

11          Q       Got it.

12                   And then you say at 7:27, Because you  
13 don't have my cell records, maybe don't include the  
14 Loretta thing. And he says, Good call, in response  
15 to that, right?

16          A       Yes.

17          Q       What are you referring to there?

18          A       That earlier text that I thought that  
19 that should be in the timeline, because it would  
20 be -- I wanted to let -- the timeline to be accurate  
21 that -- when council was informed, or when the  
22 council president was informed. But because that  
23 wasn't a city document, then I said that that's not  
24 a city document, therefore, it shouldn't be  
25 included.

1 Q Got it.

2 So with the 7:27 text message you were  
3 sort of countermanding your own order from 7:13; is  
4 that right?

5 A Correct.

6 Q Got it. Okay.

7 And he says, Good call. And then you  
8 say, Also on June 4.

9 What is that a reference to?

10 A I don't remember. That might have  
11 been a typo. I need to look at what --

12 Q Well, let me ask this question. You  
13 say -- there are really two messages here. One  
14 says, Also on June 4, and then, you know, 30 seconds  
15 later, state mayor not included.

16 Are those two messages related to the  
17 same topic or are they unrelated to each other?

18 MS. COHEN: May I suggest it might be  
19 clearer if you looked at the managerial  
20 report in connection with this?

21 MR. CELLI: Yeah. I could do that.

22 Q Would that help you, Mayor?

23 A Yes. I have the managerial report in  
24 front of me.

25 Oh, yes. On June 4 that's the email

1 that corporation counsel had -- the email between  
2 the police department that was forwarded to  
3 corporation counsel, so I wanted to make clear that  
4 that email was never forwarded to me.

5 Q Got it.

6 So going back to Exhibit 23R -- sorry  
7 to do this to you.

8 So looking at the 7:28 messages that  
9 you sent to Deputy Mayor Smith, am I correct that  
10 you're conveying that you want the report to reflect  
11 that on June 4 there were emails that you were not  
12 included on?

13 A On page 6 of the managerial report and  
14 the timeline it talks about those emails. And in  
15 that email there's a suggestion that I be included,  
16 and I wanted to make it clear that I was not  
17 included.

18 Q Okay. One other question. So there's  
19 an exchange you have on the 14th of September, which  
20 is the day that the managerial report was released,  
21 at 9:35 with Alex Yudelson, Deputy Mayor Smith. And  
22 it refers to an article that appears in the  
23 Democrat & Chronicle. If you just have a look.  
24 This Mr. Yudelson saying, I didn't read this article  
25 when it came out a few days ago, but halfway through



1 Lupien, Rachel, and Paul Hypolite basically admit to  
2 knowing that the video existed back in July and they  
3 didn't do anything about it, but are criticizing you  
4 for the same thing. Lupien could have requested to  
5 see the body-cam footage but she decided not to.

6 Do you see that?

7 A Yes.

8 Q And then you responded, Absolutely.  
9 Also the lawyer for the Prudes repped Rachel against  
10 Brit.

11 Do you see that?

12 A Yes.

13 Q What's that a reference to?

14 A There was a situation that was going  
15 on here in Rochester with the county party over the  
16 appointment of the county board of elections  
17 commissioner. And Don Thompson's rep was one of the  
18 lawyers that represented Rachel Barnhart, who's a  
19 great friend of -- or a political ally of Mary  
20 Lupien. And that was back in May and June. And  
21 that's what that is referencing, because it is my  
22 belief that Don Thompson told them what this video  
23 showed, and they knew this, and they knew that this  
24 video -- what the video showed and had knowledge of  
25 everything about how the press conference and all

1 that was going to play out. And Mary Lupien  
2 routinely asked for body-worn camera video, and she  
3 did not. And this was well before I had seen the  
4 video.

5 Q Got it.

6 So when you say, He was the one that  
7 went to the AG's office to see video, that's a  
8 reference to Don Thompson?

9 A Yes.

10 Q And what did you mean when you said,  
11 This whole thing was a setup?

12 A That the press conference, the way  
13 that this situation was handled, that I believe -- I  
14 believe that Mary Lupien and Rachel Barnhart and  
15 people knew about all of this and did not come  
16 forward.

17 Q Do you think that Mary Lupien  
18 intentionally failed to ask to see the body-worn  
19 camera footage so that there could be a release of  
20 this information and it would come as a surprise to  
21 you somehow?

22 A I can't speak to her intent. I  
23 believe that she thought that I had seen the  
24 body-worn camera video and knew what it showed and  
25 did not disclose it.

1 Q I see. Okay.

2 MR. CELLI: Mayor, I really appreciate  
3 your patience and thoroughness. And I  
4 have no further questions.

5 THE WITNESS: Thank you.

6 MR. CELLI: Thanks. Have a good  
7 night.

8 THE WITNESS: I'm sorry that it took  
9 so long. It was a long day. Thank you.

10 MR. CELLI: Your patience was  
11 appreciated very much, thank you.

12 (Whereupon, at 6:49 p.m. the  
13 deposition was concluded.)

14

15

16

17

18

19

20

21

22

23

24

25

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

C E R T I F I C A T E

STATE OF NEW YORK )  
 ) ss.  
COUNTY OF NEW YORK )

I, Pamela L. Grimaldi, a  
Registered Professional Reporter,  
Certified LiveNote Reporter, and Notary  
Public of the State of New York, do  
hereby certify that the foregoing  
Deposition, of the witness, MAYOR LOVELY  
WARREN, taken at the time and place  
aforesaid, is a true and correct  
transcription of my shorthand notes.

I further certify that I am  
neither counsel for nor related to any  
party to said action, nor in any wise  
interested in the result or outcome  
thereof.

IN WITNESS WHEREOF, I have  
hereunto set my hand this 3rd day of  
January 2021.

-----  
PAMELA L. GRIMALDI, RPR, CRR, CLR

<b>A</b>	<b>accusing</b>	309:16	214:3	130:25
<b>a.m</b> 1:17	258:17	<b>addition</b>	220:16,21	131:5
55:25	<b>acelli@e...</b>	54:23	221:3,6,15	138:6
152:8	2:6	223:25	222:2,8,10	142:14,16
191:5,7,11	<b>acknowle...</b>	<b>additional</b>	233:25	142:24
193:4	144:5	55:1 58:21	234:3	143:6,24
<b>ABADY</b> 2:3	<b>ACLU</b> 93:14	116:8	242:5	144:4,7,7
<b>ability</b> 99:4	<b>act</b> 28:5	237:19	250:21	144:11
199:14	72:9	<b>Addition...</b>	254:9	145:6,9,12
<b>able</b> 92:25	<b>acted</b> 20:12	82:15	296:7	160:5,16
93:4 123:5	20:23	<b>additions</b>	<b>advise</b>	166:21
131:12	23:19	237:13	141:19	179:3,16
266:9	37:15	<b>address</b>	<b>advised</b>	180:11
<b>absolutely</b>	54:15	227:13	126:5	183:5
254:18	<b>acting</b> 34:6	265:18	147:3	196:3
260:7	93:24	<b>addressed</b>	166:20	197:19,24
277:21	123:1	55:4	168:9	198:8,25
313:8	<b>action</b>	223:25	220:24	199:18,19
<b>acceptable</b>	119:24	224:10	234:2	200:2,13
255:5	125:7,9	225:25	<b>advisors</b>	201:2
<b>accepted</b>	129:11	<b>adhere</b> 215:2	146:6	203:17
128:19	142:13	215:10	<b>aforsaid</b>	205:16
132:9	146:7,10	<b>administ...</b>	316:12	209:4
168:13,16	175:25	51:14	<b>African-...</b>	217:20
168:19	290:11	52:17 65:4	228:13,14	218:2
170:3	316:16	65:19	<b>afternoon</b>	220:7
<b>access</b> 15:20	<b>actions</b>	67:13	18:3,10	234:7
95:11,25	38:12 85:1	71:13	20:9 154:5	235:8
97:12	106:23,23	137:17	184:21	238:16
<b>accident</b>	119:24	177:10	<b>AG</b> 129:21	244:9
50:11	156:23	246:23	160:19	245:12,22
<b>accommodate</b>	157:2,11	270:6,7	199:19	246:8,12
6:23	157:11,23	279:3	218:19	246:15,21
<b>accomplish</b>	158:3,5,13	<b>admit</b> 313:1	242:17	247:7
267:7	163:5,12	<b>advance</b>	<b>AG's</b> 20:19	250:17
<b>accurate</b>	232:4	186:25	20:21	251:8
6:11 7:6	233:1,6,8	215:19	34:21	259:18
9:20 126:9	<b>activities</b>	<b>adverse</b>	81:25 82:9	314:7
132:21	177:19	92:15	85:25	<b>agency</b> 80:10
138:20,23	<b>activity</b>	<b>advice</b>	92:13	114:4
155:18	11:5	126:12	105:17	129:14,17
248:25	<b>actual</b>	127:4,19	120:13	129:20
306:5	119:18	131:14,17	121:22	137:1
309:7,13	<b>Adam</b> 299:24	141:23	122:24	144:24
310:20	300:13	168:12,14	123:12,14	196:3
<b>accurately</b>	303:8	168:18	124:16	197:15,16
139:6	<b>adamant</b>	170:1,4	125:8,19	198:13
224:3	119:22	202:2	129:4,10	200:9,11
226:2	<b>added</b> 151:19	213:11,15	129:22	214:6,6,14
231:3	<b>adding</b>	213:25	130:8,9,16	214:24

216:11	192:15,16	154:12	<b>answers</b> 9:20	<b>appears</b>
<b>ago</b> 32:16	226:10,15	<b>announce</b>	294:1,12	151:2
40:24	237:9	160:20	<b>antagoni...</b>	158:11
116:20	298:5	222:13	38:11	312:22
117:17	312:21	<b>announced</b>	39:14	<b>appendices</b>
215:8	<b>Alexander</b>	107:18	182:25	304:24
216:16,25	229:23	160:13	<b>anybody</b>	<b>appendix</b>
312:25	<b>aligned</b>	219:11,18	18:14 40:8	303:24
<b>agree</b> 35:16	39:20	292:5	42:21 51:1	<b>applied</b> 14:9
36:13	182:23	<b>announce...</b>	74:21,25	14:18 30:2
41:17 44:2	<b>aligns</b> 37:7	160:17	102:14	41:23
46:24	<b>alive</b> 118:13	219:16	104:6,18	75:22
76:11	<b>allowed</b>	220:3	104:21	120:9
78:18	127:14,19	<b>annoyed</b>	109:10	<b>appointed</b>
116:5	134:17	275:25	116:17	5:13
122:25	135:16,17	<b>anomaly</b>	137:25	<b>appointment</b>
142:21	136:15	307:8	138:5	313:16
150:10	200:17	<b>answer</b> 7:2,3	143:9	<b>appreciate</b>
155:13	221:10	16:12,14	178:3	29:23
161:16	234:21	16:14	179:9,20	33:15 79:1
167:16	241:24	33:16	179:21	92:6
207:14	<b>allowing</b>	66:25	210:17	101:20
213:17	39:16	71:16	220:1	117:25
241:23	<b>ally</b> 313:19	80:16,18	254:7	138:12
248:10,15	<b>altercation</b>	83:7 85:24	266:4	183:14
248:23	162:10	92:6	268:25	260:12
249:12	<b>ambulance</b>	100:14	291:10	293:15
253:6	191:24	128:11	<b>anyways</b> 12:8	306:22
255:8	<b>amount</b>	138:12	138:2	315:2
<b>agreed</b>	140:10	149:8,11	304:14	<b>appreciated</b>
141:23	212:17	165:23,25	<b>apart</b> 211:21	16:19
143:10	<b>AMR</b> 115:12	167:24	<b>Apologies</b>	315:11
267:9	<b>Andrew</b> 2:6	178:25	242:20	<b>approved</b>
<b>agreement</b>	5:11	183:14	<b>apologize</b>	152:12
130:25	<b>Andy</b> 55:21	185:16	242:1	<b>approxim...</b>
143:22	77:1 80:2	198:15	283:15,20	69:9
144:11	109:3	208:6,11	295:4,9,13	<b>April</b> 52:25
145:11	132:24	236:16	<b>apologized</b>	62:10,21
<b>ahead</b> 98:25	134:20	240:11,22	283:17,19	63:1 64:10
256:14	145:18	243:3	<b>apparent</b>	67:18,25
<b>alarm</b> 238:25	165:22	247:12	232:2	68:7,15,20
285:10	188:14	249:2	<b>appear</b> 55:3	68:24
289:3	202:17	260:11	151:11	69:10 71:9
<b>alert</b> 184:23	237:21	274:24	155:2	71:20 77:7
185:18	248:11	294:22	156:12	77:10,22
<b>alerted</b>	256:4	295:10	162:1	79:10
239:2,5	266:25	306:22	184:22	80:21 81:3
<b>alerts</b> 98:14	<b>angered</b>	<b>answered</b>	185:20,23	81:8 83:25
<b>Alex</b> 191:20	156:5	261:8	<b>appeared</b>	84:9 86:12
192:12,13	<b>angry</b> 154:7	300:18	22:14	103:4

109:11	158:4	238:2	102:13	241:1
242:17	162:10	<b>asked</b> 21:2, 4	118:2	258:6
253:9, 19	164:7	21:16 37:3	139:1, 9	306:18
254:17	165:5, 8	74:21 82:7	165:23	<b>assertions</b>
255:11, 13	168:7	84:24	199:11	126:13
259:23	173:24	85:20 96:7	202:10	164:1
278:3	194:7	96:11	210:8	<b>asserts</b>
279:4, 6	197:23	97:16, 19	211:16, 17	253:1, 4
302:5	199:16	98:22	218:10	262:10
305:8, 14	207:11	99:10	220:14	<b>assist</b> 64:1
305:19	232:21	100:7, 12	260:9	<b>assistance</b>
306:1, 1	238:24	100:12	272:23, 24	10:25
<b>Archie</b> 226:6	239:8, 25	101:22	298:6	<b>Assistant</b>
226:9, 16	240:13, 19	102:14	304:15	234:23
226:21	240:24	110:14	<b>asks</b> 80:9	235:13
228:1	253:9, 19	112:10, 25	238:7	241:18
229:25	254:19, 21	113:9, 23	242:15	<b>associated</b>
230:3, 4, 7	258:8	133:3	257:14	17:6 33:2
230:12, 20	274:21	135:15, 17	258:13	<b>assume</b> 7:2
230:25	279:16	159:10	260:15	27:23
<b>area</b> 66:23	285:11	163:6, 13	<b>asphyxia</b>	41:12, 14
<b>arisen</b> 90:10	289:1, 5	163:18	78:1 79:5	100:2
<b>arising</b>	301:6, 8, 10	183:23	<b>asphyxia...</b>	249:15
104:1, 22	302:9, 24	185:15	78:16, 22	<b>assumed</b> 33:3
<b>arose</b> 86:13	303:17	187:9, 23	119:13	115:19
104:24	306:7, 8, 16	188:22	182:19	194:2, 2
<b>arranged</b>	<b>arrested</b>	199:9	<b>assert</b>	<b>assuming</b>
264:9	260:17	206:6	123:21	33:12
<b>arrangement</b>	<b>arrestee</b>	207:23	271:16	248:25
125:15, 15	26:8	237:12	272:1	<b>assumption</b>
144:11, 18	239:22	241:19	<b>asserted</b>	100:18
<b>arrest</b> 7:13	<b>arrestees</b>	243:20	68:6 77:5	<b>assure</b>
13:23 26:5	239:9	253:7	89:7 113:2	300:13
26:21 27:2	<b>arresting</b>	257:8	122:20	<b>assured</b> 28:9
29:20	120:22	260:24	124:1, 13	28:13
35:25	<b>arrests</b>	261:14	131:9	280:24
39:24 40:1	259:25	264:13	254:23	<b>attach</b>
57:1 63:7	<b>arrived</b>	273:24	267:15, 20	302:17
79:14	116:14	281:12	268:3	<b>attached</b>
80:23 84:6	117:6	289:19	282:18	119:3
86:17	<b>arriving</b>	297:11, 23	<b>asserting</b>	237:20, 22
93:22	118:15	299:18, 18	68:19	278:15
104:3, 8	119:1	300:10	<b>assertion</b>	302:12, 14
111:4	<b>article</b>	309:20	105:9	302:16
118:17	56:22	314:2	120:7	307:8
127:20	312:22, 24	<b>asking</b> 6:8	126:8	<b>attaching</b>
139:5, 12	<b>articulate</b>	25:18 31:7	129:10	3:19
155:10	34:18	36:5 62:13	144:21	<b>attachment</b>
156:6, 20	283:4	67:2 85:22	163:25	237:10
157:23	<b>aside</b> 64:8	99:23	235:8	<b>attacked</b>

276:9	159:13	212:7	177:3	245:14
<b>attempt</b>	160:1,13	<b>audio-ta...</b>	179:7	<b>Avenue</b> 2:4
211:10	168:10	275:4	181:8,17	191:22
<b>attention</b>	176:19	<b>August</b> 48:15	181:25	286:5
21:23 43:4	179:9,11	61:9 63:13	182:1,2	<b>awake</b> 184:22
51:13,24	179:12,21	63:17 71:2	210:3	185:18
53:17	180:1,7,14	71:7,14,24	217:5,6,9	<b>aware</b> 5:15
58:17	180:24	72:3 77:22	217:10	50:18 53:3
92:22	183:9	77:23 78:8	223:16	62:20,23
114:13	184:4	79:6,17	224:22	76:22 77:7
157:17	196:9,24	81:23	225:1,4,9	79:15,15
191:3	196:25	82:21,22	225:10	81:11,17
193:2	197:4	83:17 84:3	231:12	84:4,16
195:5	198:11,12	84:9 86:12	232:16	88:6 90:16
241:7	199:10,23	91:8,12,15	233:1	90:18,24
243:23	202:3,4,6	91:21 92:1	234:10	91:6,17
295:2	203:8,9,12	92:8,12	238:13	97:17 98:5
308:20	203:13,24	103:4	241:23	99:7 100:9
<b>attorney</b>	204:1	104:11,25	257:16	101:16
5:20 27:14	205:21	105:22	279:4	102:6
34:2 35:7	206:10	107:6,15	295:19	106:4,6
77:13,20	214:7,18	108:2	296:5	107:3,3,5
79:18	214:25	109:11,14	300:12	107:5
80:20	215:3,11	109:20	306:2	108:12
83:23 85:1	216:6,8,10	117:5	309:21	114:11
113:21,23	216:11	119:8	<b>aunt</b> 265:6	120:17,21
122:13	217:14	120:16	<b>author</b> 99:2	163:4,12
123:6,18	218:14,19	121:1,9	<b>authority</b>	174:1
123:22	219:1,11	130:2	122:20,23	177:4
124:2,6,8	219:18	131:18	123:23	180:12
125:4,16	220:2	132:22	124:8	186:8
126:23	221:16	136:11	137:9	205:5
127:6,21	223:11	137:16	138:10,10	206:23
128:5,9,15	233:15,16	138:18	145:9	209:23
129:2,13	234:5,23	139:2,18	202:7,8	210:11
130:22	235:5,13	139:24	203:8	212:10
131:11,15	235:13,22	140:19	216:9	217:7
132:6,17	236:1	144:19	<b>authorize</b>	242:16,17
133:6,14	238:14	146:4,5,14	98:23 99:3	262:9,13
133:24	241:17,18	150:14	211:9	262:16,19
134:9	242:6,8,10	152:17	212:16	278:22
136:3,6,16	243:18	153:23	<b>authorized</b>	294:4,13
136:24,25	<b>Attorney's</b>	165:21	97:24	294:19
137:4,10	27:9 34:1	167:14,20	211:12,18	<b>awkward</b> 23:2
137:22	207:3	168:3	212:20,21	23:3
138:3	<b>attorney...</b>	169:22	<b>autopsy</b>	<b>AY</b> 237:14
140:20	109:21	170:20	261:15,16	
142:12	<b>attorneys</b>	174:4	<b>available</b>	<b>B</b>
143:12	2:3,12	175:11	153:7,18	<b>back</b> 9:13,17
144:8	130:20	176:16	163:1	10:4 17:1



32:23 33:7	307:9,20	272:12	<b>beginning</b>	121:20
42:10,20	308:8,18	302:1	19:22	122:10
57:1,9,22	312:6	306:20	152:15	124:18,23
82:8 86:1	313:2,20	<b>basement</b>	195:6	140:13
91:10,14	<b>background</b>	68:16	204:20	141:25
91:22	219:9	69:10	214:21	142:4
105:25	247:5	<b>basic</b> 6:7	216:3	145:1
112:15,15	<b>backgrounds</b>	<b>basically</b>	282:16	146:19
114:8,20	301:1	9:22 34:9	306:18	148:2,8,20
123:8	<b>bad</b> 70:5	39:10	308:21	153:1
128:2	117:12	103:3	<b>begins</b> 43:9	154:17
129:25	182:17	121:24	164:14	155:7,11
135:7	183:25	125:20	192:10	155:21
150:24	284:4	147:4	<b>behalf</b> 50:1	158:19,19
152:20,21	292:21	149:14	<b>behaved</b>	163:22
158:22	<b>badge</b> 164:17	225:16	28:14	174:12
161:19	164:22	232:20	100:20	175:12,14
163:2	<b>balance</b>	269:2	<b>behavior</b>	175:17
167:1	227:7	274:6,15	38:8 39:14	176:7,9
173:14	<b>barking</b>	289:16	113:10	177:1
176:11,18	55:17	301:2	<b>belief</b> 73:10	179:11
179:14	<b>Barnhart</b>	313:1	98:22	181:25
182:1	313:18	<b>basis</b> 92:3	135:21	182:10
185:5	314:14	130:11	144:9	184:12,20
188:13	<b>based</b> 20:22	131:10	182:24	190:18,24
191:19,20	23:12 37:5	136:21,23	208:15	191:12,16
192:13,13	75:18	141:9	250:16	193:17,23
192:17	113:22	142:19	313:22	195:20
194:20	129:14,18	143:12	<b>believe</b> 7:25	198:4
204:15	131:14	144:22	19:5 20:6	199:17
205:25	136:15	145:10	20:18	201:23
209:4	141:23	179:17	24:14 26:2	202:20
210:23	144:15	196:2	26:4 31:12	208:12,16
222:7	167:24	221:5	33:21 34:6	209:15
224:24	168:10	<b>Bates</b> 3:15	37:13,19	210:6
234:18	171:17	4:7 151:2	40:13 41:2	216:2
238:3	176:19	152:6,16	48:3 53:4	217:13,21
242:17	179:6	158:11	53:7 60:2	222:23
243:4	198:7	<b>Bay</b> 37:23	63:18 70:4	223:20,23
247:11	201:11	56:4,19	75:5 78:16	224:5
255:19	202:1,9	<b>bearings</b>	78:21,23	226:11
259:17,19	203:15	81:21	82:4 85:3	228:12
260:9	207:15	<b>beaten</b> 39:17	85:24	248:3
269:18	208:15	<b>Beath</b> 62:5	88:10	250:10
270:22	217:8	62:15	90:12,13	251:3,19
271:18	223:15	279:21	90:13	253:16
272:8	228:25	<b>becoming</b>	91:12	254:19
273:8,21	235:15	39:19 53:3	113:14	258:4
278:5	241:3	<b>began</b> 112:4	118:5,12	259:8
279:10	257:18	296:19	120:1,11	265:19

270:4,5	282:22	313:5	178:10,14	<b>brief</b> 132:11
272:21,25	290:9,13	<b>body-worn</b>	180:8	<b>briefed</b>
275:3	290:20	15:20,22	181:10	42:16
279:3	292:1	16:2 21:13	183:18	110:14
281:17,19	306:15	28:4 36:6	187:21	295:6,8,14
283:19	<b>believes</b>	36:9 37:17	203:19	309:17
285:2	258:3	38:6 54:25	204:11	<b>briefing</b> 4:3
286:20	<b>best</b> 6:16	87:8,15,19	212:14	43:10
290:12	7:3 25:21	88:8,13,20	224:18,19	192:21
291:2	119:8	88:23	225:12	295:1
297:5,11	166:1	89:21	247:24	<b>briefly</b> 5:10
302:11,22	211:13	90:19 91:1	248:9,21	<b>briefs</b> 293:9
303:6	243:13	91:25	259:19	<b>BRINCKER...</b>
304:16,20	249:4	92:10,18	314:2,18	2:2
305:2	258:23	92:22,23	314:24	<b>bring</b> 108:14
314:13,14	<b>better</b> 63:15	93:1,9,17	<b>bold</b> 237:14	227:7
314:23	224:4	94:5,15,25	<b>bone</b> 276:11	234:18
<b>believed</b>	<b>big</b> 109:4	96:4,12,16	<b>book</b> 21:3,5	307:20
9:23 33:19	269:23	96:25	28:2,7,10	<b>Brit</b> 313:10
35:13 40:4	<b>bigger</b> 43:7	97:12,17	32:20	<b>broke</b> 276:10
42:7 44:14	<b>birthday</b>	97:25 99:3	112:2	<b>brother</b> 8:25
44:22	234:23	99:10	113:2	9:1 31:22
46:24 55:8	<b>bit</b> 8:19	102:3,19	118:7	<b>brought</b>
92:15 94:1	30:19	106:17	232:22	51:13,24
106:20	37:16	110:5	239:1	53:16
111:23	71:17 83:5	120:15	268:5	92:23
112:6	92:7 118:2	130:5,6,10	306:17	114:12
117:10,13	137:25	130:18	<b>bore</b> 247:21	227:12
117:18	148:3	131:7	<b>born</b> 228:15	243:23
119:22	158:1	132:3	<b>bottom</b> 62:8	<b>Brown</b> 256:23
123:13	179:19	137:12	157:20	<b>Bryant</b>
130:11	198:16	140:21	160:23	269:21
136:16	205:11	141:15	164:5	274:12
139:15	307:8	142:1,5,10	200:7	276:6,8,24
161:20	<b>bite</b> 108:19	142:17,22	206:5	277:4
175:12	<b>BJ</b> 191:5	143:11	232:24	<b>building</b>
202:21	192:4,8,10	144:6,13	<b>break</b> 6:19	95:7,15
217:7,25	192:12,16	145:5	10:21 12:5	228:23
218:2,23	297:25	162:9	31:23 32:2	<b>buildings</b>
221:11	298:5	164:9,16	32:6,9	41:3
222:24	<b>black</b> 228:22	165:9	55:19	<b>bureau</b> 52:3
228:11	229:17	167:21	100:4	52:8,9
250:8,15	<b>blank</b> 221:23	168:4	108:19,20	53:5,12,18
257:2	<b>blanking</b>	173:23	109:3	53:22 65:3
258:23	95:16	174:2,13	145:13	66:20 67:8
267:16	<b>blindsiding</b>	174:19,25	185:2,4,13	209:17
274:19	293:22	175:10,16	256:7,11	<b>bus</b> 289:22
278:22	<b>board</b> 313:16	176:3,11	256:16	<b>bystander</b>
280:25	<b>body</b> 180:2	176:17,18	<b>breathing</b>	37:15
281:13	<b>body-cam</b>	177:12,25	112:16	86:17

<b>C</b>	172:15	26:25	165:9	101:3
<b>C</b> 2:1 316:1	174:12	32:22,23	167:22	122:14
316:1	180:13	33:10,11	168:4	123:25
<b>calendar</b>	182:8,13	33:18	173:23	124:7
17:9 33:7	183:21,22	255:23	174:2,13	126:4,17
<b>call</b> 8:6,14	184:10	256:1	174:19,25	127:1
8:17,22	186:9	268:19	175:10,16	144:1
9:18,22	190:19,21	298:22	176:3,3,11	154:6
10:19,22	190:25	<b>camera</b> 15:20	176:18	179:2
11:3,7,12	197:5	15:23 16:2	177:12,25	180:9,21
11:17	232:1	21:13 28:4	178:11,15	188:1,3,18
12:14 13:3	252:9	36:6,9	180:2,8	191:20
13:25 14:7	263:23	37:17 38:6	181:10	195:9
14:15,25	268:19,23	54:25	183:18	196:4,23
15:7,9,13	271:4,10	71:12 87:8	187:21	197:14,25
16:1,4,10	271:13	87:15,19	203:19	198:11
17:3,12,13	278:5	88:8,13,20	204:11,11	199:20,24
17:13,17	293:5	88:24	212:14	200:4,8
17:21 18:2	294:17	89:21	224:18,19	201:9
18:8,10,15	298:10,11	90:19 91:1	225:12	202:5
18:23 20:4	298:15,16	91:25	247:24	203:11,12
20:10 21:1	310:14	92:10,18	248:9,21	208:3
21:16,21	311:7	92:22,23	259:19	209:11
22:13,21	<b>called</b> 5:2	93:1,9,17	314:2,19	211:4,14
23:9,11,25	9:1 61:4	94:5,16,25	314:24	212:8
24:7,21	102:25	96:4,12,16	<b>cameras</b>	213:18,19
25:13	111:2	97:1,13,17	112:13	214:5,22
26:18	112:3	97:25 99:3	164:16	218:12
27:18,19	159:8	99:10	<b>candidate</b>	221:10,10
28:14,19	237:11	102:3,19	282:10	225:22
29:25	245:9	106:17	<b>capability</b>	228:12
32:12,20	252:2	110:5	152:23	233:13
32:24 33:1	264:10	112:16,23	<b>car</b> 26:11	235:9
33:12,13	269:10	118:9	41:2,9	242:16
34:5 49:7	271:12	120:15	147:11	272:2
49:15,24	291:3	123:9	<b>care</b> 310:10	274:12
50:2,13	292:15,16	130:5,6,10	<b>careful</b>	278:18
51:20	301:9	130:18	118:1	288:24
54:13 59:8	<b>calling</b>	131:8	126:5	291:15
59:10,19	66:25	132:4	179:2	297:19
59:21 61:2	98:13	137:12	<b>carefully</b>	<b>cases</b> 34:10
66:23 74:1	159:5	140:21	6:10	99:9 124:9
77:6,9	180:23	141:16	<b>Carrie</b> 2:15	126:3
87:2 93:17	182:14	142:1,5,10	108:25	202:5
94:12,15	273:24	142:17,22	135:6	206:11
94:20,20	284:3	143:11	<b>case</b> 9:23	214:8,10
94:24	292:22	144:6,13	14:5 35:5	241:4
97:24	<b>calls</b> 10:4,6	145:5	38:7 53:14	<b>catch</b> 297:20
98:11	16:21	162:9	56:6,10	<b>caught</b>
160:19	25:22 26:1	164:9	66:11 99:5	213:20

<b>cause</b> 42:18 43:13 45:11,16 45:23 47:1 70:25 73:11 76:17 178:20 207:23 208:17	108:25 109:7 133:2,10 134:24 135:6,19 145:13,22 146:2 185:3,9,12 188:18 201:16 202:18 221:19 237:24 247:11,15 253:14 256:8,19 267:2 308:4,10 308:13 311:21 315:2,6,10	<b>chance</b> 185:16 <b>change</b> 80:16 159:22 162:20 163:21 228:16 259:14 <b>changed</b> 44:4 163:22 <b>changes</b> 158:21 159:5 225:12 <b>changing</b> 157:7 <b>character</b> 284:7,9 <b>characte...</b> 134:23 156:5 <b>characte...</b> 12:16 212:4 <b>characte...</b> 131:2 135:5 <b>characte...</b> 253:10,13 <b>charge</b> 124:17 129:22 138:8 214:13 216:12 <b>charged</b> 216:10 <b>charges</b> 39:15 <b>check</b> 49:25 251:21 252:4 299:3 308:6 <b>checked</b> 230:15 251:23 255:19 <b>Chicago</b> 8:25 42:16	43:12 193:11 <b>chief</b> 8:6,21 10:20,22 11:4,12 12:1,14 13:19 14:1 14:8,16,25 15:12,19 16:4,21 17:7,23 18:9,19 20:1,5,8 21:1,11,20 22:17 23:6 23:18,25 24:7,19,23 25:7,20 27:18 28:1 28:9,13,25 29:4,22,25 31:20 32:3 32:21 33:2 33:17 36:7 36:20,23 38:5,19,21 38:22 40:11 42:15,21 43:18,24 44:9 45:21 46:2 47:9 47:13,24 48:2,7,17 48:17 49:1 49:14 50:8 50:19,23 51:1,5 54:2,7,10 54:12,19 54:22 55:8 55:13 56:10,14 57:8,17,20 59:4,9 60:16,21 61:12 62:9 62:17,20 62:25 63:6 64:3,15,19	64:25 65:2 65:5,10 66:12,17 66:25 67:6 67:16 68:5 68:15,23 69:1,8,23 70:10,20 77:5,10,12 77:17 82:3 84:24 85:6 85:18 87:7 87:8,21 89:6 93:10 93:10 94:8 94:20,21 94:24 96:21 103:16,25 106:15 111:23 112:3,10 114:19 116:14,21 116:23 117:6,22 118:3,4,15 118:16,20 119:1 120:8 121:3,6,8 121:15,20 121:25 122:2,19 123:4 124:13,19 138:7,19 138:23 139:3,16 139:18,22 146:7,11 146:22 147:8,25 149:22 150:1 152:7,11 152:16 153:7 154:3,11 155:3,9,17
<b>caused</b> 46:14 46:19,25 72:12 73:20 74:8 74:11 76:24 88:22 114:23 115:8 259:14 304:4	<b>centered</b> 136:14 <b>Cephas</b> 226:6 <b>certain</b> 93:16 126:6 225:13 <b>certainly</b> 255:3 266:20 <b>Certified</b> 1:18,19 316:7 <b>certify</b> 316:9,14 <b>chain</b> 62:4,8 94:3 101:6 101:12,15 128:16 <b>chair</b> 194:14 <b>challenge</b> 12:11,13 56:8 57:6 <b>challenges</b> 9:2 11:21 12:3 186:12 <b>chamber</b> 281:19	<b>causes</b> 38:4 <b>cautious</b> 126:6 <b>c Cohen@m...</b> 2:16 <b>cell</b> 9:18,21 16:25 17:2 17:7,9 20:2 32:14 32:15 33:8 43:2 147:15 182:1,8 188:7 255:20 274:11 276:2,21 299:1 310:13 <b>Celli</b> 2:2,6 4:13 5:8 5:11,12 14:24 30:16,18 30:21 47:19 55:18,22 56:1 80:5 104:13	<b>causes</b> 38:4 <b>cautious</b> 126:6 <b>c Cohen@m...</b> 2:16 <b>cell</b> 9:18,21 16:25 17:2 17:7,9 20:2 32:14 32:15 33:8 43:2 147:15 182:1,8 188:7 255:20 274:11 276:2,21 299:1 310:13 <b>Celli</b> 2:2,6 4:13 5:8 5:11,12 14:24 30:16,18 30:21 47:19 55:18,22 56:1 80:5 104:13	

155:22	243:4,6	291:21,25	139:12	138:10
156:13	247:25	292:5,13	168:6,22	140:1,20
160:25	248:2	293:21	169:3,12	140:22,25
161:5,13	249:16	294:13	169:18	141:14,19
161:18,20	251:13	300:25	170:22	142:13,19
161:21,24	252:6,22	301:9,15	171:11	143:10,23
162:16	253:17,23	302:2,22	174:11	144:5,12
165:3,14	254:14,18	303:16	198:19	144:14
165:21	255:3,10	304:5,6,10	199:15	145:1,4
166:17,23	256:3	304:17	279:15	148:4
167:3,11	257:3,14	305:1,3,6	<b>citizens</b>	160:16
167:12	257:16,22	306:4,9,14	197:12	162:9
176:8,10	258:16,23	307:4,5	<b>city</b> 1:3,5	169:15
176:25	259:1,8,23	<b>chief's</b>	2:3,12	170:21
177:4	260:16,19	95:18,19	5:14,18	171:3
178:3	260:20,24	291:11	30:12 40:8	173:2
182:21	261:1,14	294:5	50:1 53:16	196:11
187:22,23	261:17,21	<b>child</b> 86:23	68:16	197:21
193:17,23	262:9,14	87:12 88:9	69:10	198:5,18
195:8	262:18	88:14	72:18	199:6,14
204:20,23	263:1,5,7	<b>Chodak</b> 4:6	79:12,24	201:4,8,24
205:7,11	263:9,11	299:25	80:21	202:14,22
205:21	263:14,16	300:7,10	83:12,24	203:10,15
206:14,20	263:21,22	303:9	92:23	204:10
207:8,16	263:23	<b>choking</b>	94:10	210:10
207:22,24	264:5,7,20	120:6	96:13,14	211:13
208:5,19	265:4,9,11	<b>Christopher</b>	101:18	212:12
209:8	265:17,21	37:11 38:3	102:2	214:8,11
214:23	266:11,18	38:10,19	104:6,18	214:19
222:20,23	266:24	39:13	104:21	217:15
223:2,14	267:4,12	127:15	106:3	218:21,22
223:17,25	267:15	183:24	107:2,8,12	219:12,19
224:10,23	274:1	<b>Chronicle</b>	108:14	222:16,17
225:3,8	275:3,16	193:9	109:11	226:22
226:1,14	276:4,23	312:23	113:20	228:14
226:21,25	276:25	<b>chunk</b> 109:4	114:1	234:15
227:21,24	277:6,14	<b>circumst...</b>	121:24	235:16
228:6,11	278:1,9,19	23:3	122:14	242:9
228:12,22	279:13,23	<b>circumst...</b>	123:4	243:20
229:18,23	281:6,25	40:17 41:6	125:21	264:17
229:23	282:4,9,13	50:17	126:1	273:4,5
230:1,4,8	283:15	86:13	128:11	277:8
230:15,25	284:22	96:11	129:16	286:1
231:10,17	285:4,17	97:15	130:8,10	289:8
232:2,3,9	285:24	107:14	130:17	291:18
232:18	286:24	110:13,24	131:1	292:4,20
238:8,8,9	287:16	117:21	132:7,11	293:7,8,9
239:2	288:10	118:17	133:7	293:23
240:4,16	289:7,21	136:13	136:4,12	295:4,5,14
242:22,24	290:9	137:19	137:2,11	296:9

303:7	<b>classified</b>	<b>clip</b> 293:24	19:20	259:20
310:23,24	27:4,5,10	<b>close</b> 58:17	33:22	269:15
<b>City's</b> 33:11	27:15	59:1 160:6	34:11	291:12
202:8	58:21	<b>closed</b>	36:25 48:5	293:22
<b>civil</b> 169:7	72:22 73:4	209:15	49:8 52:4	294:6
169:16	214:9	266:3	52:14	<b>commencing</b>
170:16	<b>classifies</b>	<b>clothes</b>	60:22	1:17
<b>claim</b> 89:7	72:23	265:15,16	74:16	<b>comment</b>
93:19	<b>classify</b>	<b>cloud</b> 122:16	84:11	165:1
107:1,20	57:12	<b>CLR</b> 316:24	87:14 88:2	181:4
108:7	302:2	<b>coffee</b> 185:7	95:8,21	217:11
113:19	<b>clear</b> 6:6	<b>Cohen</b> 2:15	105:25	239:14,18
140:1,7,15	9:15 21:17	5:17 16:11	111:9	246:19
183:12	23:5 64:7	16:16	114:10,13	250:22
210:4,10	71:4 72:2	30:14,17	144:16	257:22
210:19,21	85:15	47:17	152:20	<b>commentary</b>
212:2,12	87:18	55:21 77:1	163:21	206:24
247:6	110:1	80:2	164:23	<b>commenting</b>
252:23,25	113:17	104:11	173:14	198:5
281:11,14	134:21	109:1	181:13	<b>comments</b>
285:24	142:4	132:24	185:4	151:19
288:16	166:22	134:20	219:17	181:1
296:21	167:25	135:2,12	234:1,24	205:11
306:14	173:11	145:16	235:5	217:15
<b>claimed</b>	183:16	153:9	241:9,11	246:22
279:25	197:9	165:22	241:24	296:9
<b>claiming</b>	210:7	185:1,6	247:10	<b>commissi...</b>
140:10	215:5	188:14	264:1	313:17
253:7	221:13	198:22	265:7,11	<b>committed</b>
<b>claims</b> 68:15	223:6	202:16	265:12,18	72:9
<b>clarific...</b>	225:9	218:10	272:10	228:15
26:16	231:23	221:18,23	290:16	229:5
<b>clarifies</b>	235:3	237:21	314:15,20	273:5
244:2	255:14,17	248:11,24	<b>comes</b> 92:22	<b>Common</b>
<b>clarify</b> 76:4	256:1	253:12	209:4	176:23
113:16	258:15	255:25	<b>coming</b> 53:11	<b>communicate</b>
145:17	300:3	256:15	53:22	15:1 16:5
196:14	301:20,24	266:25	84:23	22:5,13
222:6	303:8	308:9	125:24	24:1 29:4
297:12	312:3,16	311:18	140:14	65:11
<b>clarifying</b>	<b>clearer</b>	<b>coin</b> 199:3	234:9	66:18 67:6
83:19	164:7	199:12	269:18	155:17
114:9	165:4,7,18	<b>cold</b> 22:7	273:8	170:21
245:1	311:19	<b>colleagues</b>	<b>command</b>	171:8,22
<b>clarity</b>	<b>clearly</b>	5:12 308:6	38:23	172:3,18
244:4	34:19	<b>collection</b>	39:12 51:9	197:20
245:10	258:21,25	177:12	59:9 94:3	200:24
263:4	267:23	<b>Collecti...</b>	101:7,12	211:19
<b>clashes</b>	288:15,25	307:2	101:15	219:22
293:3	289:1	<b>come</b> 8:4	163:5,13	220:1

232:14	93:18	268:11	315:13	33:10,12
238:20	195:7	275:17,21	<b>concluding</b>	69:13,15
239:20	213:10	<b>concerned</b>	215:3	69:24
242:2	224:5	20:22	306:11	70:21
263:13,16	227:5	105:12	<b>conclusion</b>	71:20
<b>communic...</b>	228:16	126:19	25:22	84:23 85:8
39:11	235:1	164:6,15	28:19	85:11,18
129:23	281:12,15	165:4,17	114:23	190:19
149:24	281:19,24	170:14	128:4	191:11
150:14	284:2	178:13	166:8	195:4,15
171:13	<b>compared</b>	252:1	169:22	195:21
173:6	155:19	258:10	175:22	220:12
218:14	<b>comparison</b>	269:6,19	196:8	226:14
231:1	183:24	273:9,22	203:6	230:2,9,11
253:8	<b>compel</b> 209:5	274:23	216:3	245:5,8,17
<b>communic...</b>	<b>compendium</b>	<b>concerning</b>	<b>conclusions</b>	251:18
12:1	4:10 43:2	69:24	304:3,16	256:20
171:21	189:18	80:11,22	305:17	257:1,7
187:13	<b>complaint</b>	84:5	<b>condition</b>	258:22
222:6	52:1	103:17	186:17	262:11,15
232:8	<b>complaints</b>	104:1,6	<b>conditions</b>	262:17
264:4	52:4,13	106:4	12:11	263:18
288:19	53:20	109:12	283:24	271:16
301:5	<b>complete</b>	110:9	<b>condolences</b>	287:9
<b>communic...</b>	132:20	130:17	50:1 61:5	313:25
55:8 65:13	160:2	131:1	<b>conduct</b> 13:3	314:12
67:14	221:16	206:24	22:3 24:24	<b>confidence</b>
<b>communic...</b>	<b>completed</b>	248:21	36:1 55:9	258:16,20
52:7 53:5	197:17	<b>concerns</b>	73:11	<b>confiden...</b>
53:11,17	200:11	38:19	85:23	1:1 109:21
53:22 65:3	<b>completely</b>	106:16	86:14	171:23
65:6,14,17	112:21	167:13	128:3	172:2,6,9
65:21	<b>completion</b>	169:5	243:13	172:25
66:20,23	159:14	182:20	254:16	173:1,6,17
66:24 67:7	160:6	248:8	255:5	173:19
67:23	<b>complied</b>	<b>conclude</b>	<b>conducted</b>	184:2
88:12	191:23	23:21 85:6	84:13,17	295:24
109:10	<b>comply</b> 141:7	138:18	84:21 86:4	296:1
116:21	142:19	166:16	204:25	<b>confirm</b>
149:4	143:5	207:18	205:1	208:19
176:9	216:12	291:21	276:14	<b>confused</b>
190:25	<b>complying</b>	304:4	<b>conducting</b>	135:9
245:10	145:3	<b>concluded</b>	86:5,8,10	185:24
262:23	<b>compound</b>	138:19	181:2	238:8
297:6	242:15	139:10	<b>conference</b>	<b>confusing</b>
305:15,20	<b>computer</b>	206:9	3:17,20,22	80:3
310:7	152:24	209:17,20	10:4,6	<b>connect</b> 86:6
<b>community</b>	159:4	213:13	17:11,13	114:10,14
19:7 42:8	<b>concern</b>	246:11	17:17,21	115:8
87:6 93:13	155:17	249:20	18:1,14,23	<b>connection</b>

79:13	99:18	182:20	279:25	121:2,15
90:20	100:22	192:3	280:6	122:2,10
219:14	101:18	<b>contribu...</b>	287:11,12	124:13,17
311:20	179:21	76:16	288:6,9	125:25
<b>consciou...</b>	196:25	78:24	292:11,19	126:4,7,22
9:5,7	197:1,4	<b>control</b>	297:16	132:5,9
10:12	205:16	196:21,22	299:13	133:6,13
21:25	239:21	215:6	300:23	133:22
192:2	250:9	<b>conversa...</b>	<b>conversa...</b>	136:16,21
232:20	<b>contacted</b>	9:12,14	25:19	141:2
<b>consider</b>	31:21	19:24,25	28:25 29:4	146:15
36:5 45:14	54:12	25:19	48:7 91:6	154:5
234:13	98:16	31:20	130:2	157:7
<b>consider...</b>	145:6	33:20 57:7	210:12	164:8
39:22 40:7	301:3	64:16	223:16	165:9
44:8,18	305:24	68:23	226:4	168:9,19
107:9,20	<b>contacting</b>	69:23	235:14	174:8
154:1	210:22	70:10,18	287:1	176:7
<b>considered</b>	<b>contacts</b>	71:8 117:5	294:17	179:6,13
108:4	109:9	120:25	<b>converted</b>	179:15
168:20	205:21	122:5	17:10	183:6
246:24	<b>contained</b>	148:11,11	33:10	184:3
<b>considering</b>	306:20	151:5	<b>convey</b> 70:11	195:17,22
281:7	<b>context</b>	159:25	165:19	198:9
<b>consistent</b>	70:20 91:9	177:2	<b>conveying</b>	200:1,6
28:15	92:8 106:3	180:6	312:10	201:12
55:10	106:17	181:21	<b>cooperate</b>	202:1,10
<b>constant</b>	110:12	183:17	292:2	203:16
205:15	123:22	185:14	<b>coordinate</b>	211:18
<b>constantly</b>	138:1	186:2	66:4	212:24
213:12	200:25	192:18,23	<b>copy</b> 8:10	213:3
<b>constituent</b>	213:7	223:21	30:7	217:12
51:21 52:1	240:2	224:23	201:17	218:22
52:6,21	272:4	225:8	227:16	220:16,21
94:12	280:1	230:18	244:16	222:8,9
98:17	287:5,21	232:17	304:14	226:10,11
101:13	288:4,8	235:19,25	<b>coronavirus</b>	233:1
<b>constitu...</b>	289:20	236:4,13	10:1	234:2
52:14	300:20	245:25	<b>corp</b> 118:15	242:6
96:17	303:5	249:18	249:7	245:13
102:25,25	<b>continue</b>	250:2	<b>corporate</b>	248:4
<b>contact</b>	272:1	255:19	218:25	259:22
24:20 25:4	<b>contrary</b>	256:2	<b>corporation</b>	279:17,18
25:14,23	228:1,4	263:21	82:1 83:17	296:7
26:3,8,19	292:9	265:9	92:1,14	312:1,3
26:20 56:7	<b>contributed</b>	266:10,18	105:20	<b>correct</b> 5:18
57:5 61:4	36:16	267:8	111:18	5:19 11:2
61:8 65:17	186:13	275:4,9,14	114:5,12	13:12
74:2,2	255:1	277:7,13	116:13	15:24
96:17,19	<b>contribu...</b>	277:18,24	117:1,7,20	19:19



23:20	316:12	194:18	179:6,13	34:1 87:2
28:17	<b>correcting</b>	273:23	179:15	214:12
36:18 38:2	157:7	275:18,22	183:6	313:15,16
41:11,20	<b>correctly</b>	276:11	184:3	316:4
47:7 48:9	146:23	281:20,21	191:6	<b>couple</b> 30:9
49:12	221:7	289:8	195:17,23	130:1
54:18	310:10	292:21	198:9	135:3
55:11	<b>correspo...</b>	293:7,8,9	200:2,6	139:23
56:12	310:5	293:12	201:12	183:23
57:25	<b>correspo...</b>	294:25	202:10,25	204:16
69:20	293:20	295:4,5,5	203:16	260:13
71:25 72:6	<b>council</b> 1:3	295:8,14	211:18	282:12
76:9,21	2:3 4:3	295:18,21	212:24	293:14
81:1,16	5:14 40:8	296:1,16	213:4	308:14
84:7 85:19	44:17,18	296:20	217:12	<b>course</b> 26:21
100:16	96:13,14	299:4,5,6	218:23,25	33:16
118:24	97:11,16	299:9	220:16,22	91:15
128:6,18	97:18,23	309:17	221:15	211:22,24
140:23	98:11,12	310:21,22	222:2,8,9	223:5
146:16	98:23 99:3	<b>council's</b>	226:10,11	238:10
154:15	99:10,17	269:6	233:2	<b>court</b> 1:25
155:3,4	99:22,23	286:2	234:2	16:13
156:14	100:2,7,14	<b>counsel</b> 82:2	242:6	109:1,2
158:25	100:21,23	83:17 92:2	248:4	256:5
161:6	101:12,18	92:14	249:8	<b>courtesy</b>
163:16,20	101:21	105:20	259:22	269:17
166:7	102:2,19	111:18	279:17,18	295:16
175:7	102:22	114:5,12	296:7	296:2
181:18	132:11	116:13	312:1,3	<b>cousin</b>
189:1	170:22	117:2,7,21	316:15	233:18
194:7,8	171:1,3,4	118:15	<b>counsel's</b>	265:6
202:19,20	171:8,9,14	121:2,15	132:9	<b>COVID</b> 19:14
209:7,13	171:15,16	122:2,10	202:1	225:13,17
222:19	171:19,21	124:14,17	<b>count</b> 58:6	<b>crazy</b> 113:8
228:2,6,7	171:22	125:25	58:24	113:8
231:20	172:1,4,8	126:5,7,22	72:17 73:3	183:1,1
232:12	172:11,16	132:5	73:5 74:9	<b>created</b>
244:12	172:18,19	133:6,13	74:19,23	82:16 90:8
247:19	172:24	133:22	75:1,7,12	220:11
256:21,22	173:2,4,7	136:16,22	75:13,25	294:25
261:9,10	173:9,18	141:2	<b>counted</b>	<b>crime</b> 19:7
283:25	181:14	146:15	74:12,18	58:16
286:6	182:9	154:5	235:1	<b>Crimes</b> 27:20
297:1,9	184:10,11	157:7	<b>counterm...</b>	27:24
300:7,14	184:18	164:8	311:3	84:12,21
300:17	187:6,12	165:9	<b>counterpart</b>	85:9,16
301:6	187:21	168:9,19	163:9	86:4,7
309:19	188:21	170:1	<b>country</b>	204:25
311:5	192:21	174:8	103:8	206:25
312:9	193:5,17	176:7	<b>county</b> 27:8	209:16,16

302:16	<b>current</b>	248:19	118:12	221:4
306:10,12	59:25	<b>Curtin-W...</b>	119:23	232:1
<b>criminal</b>	<b>cursorly</b>	3:12	189:8,21	236:6,7
11:5 16:6	54:25	<b>custody</b> 9:4	190:9	241:10,12
22:2 33:25	<b>Curtin</b> 3:19	10:11,24	192:20	242:1
34:15,22	79:18 83:1	11:14 12:3	193:9	250:3
35:10,12	83:4	12:17	286:4,19	251:16,19
72:9,16	109:20	13:14,15	296:23	256:1
73:11,20	110:3,4,14	13:16	<b>date</b> 4:10	262:5,6,11
74:9,16	110:19,23	14:10 15:2	62:6 83:4	262:13
75:2,7,23	119:4	21:8,22,24	91:12 95:1	263:21
75:25	124:21	26:4 40:21	104:19,19	264:20
159:15	125:3,14	40:22,25	104:22	291:21
169:25	126:11,25	156:8	115:5,6,24	292:6
170:11,15	127:5,18	187:10	116:1,4	302:11
204:25	128:2,13	188:24	132:23	303:19
205:6,14	129:3,23	231:9	180:4	305:9
206:17	130:15,24	232:3,19	181:24	309:6
208:2	131:6	240:14	195:20	312:20
209:10	132:5,21	274:21	297:15	315:9
<b>criminally</b>	132:23	<b>customary</b>	<b>dated</b> 54:3	316:20
72:25	134:3,17	65:1 66:17	83:2	<b>day-to-day</b>
<b>criteria</b>	135:23	67:5	<b>daughter</b>	65:17
75:17,19	136:1,18	<b>cut</b> 22:23	233:18	<b>days</b> 209:21
75:22	137:8	124:5	<b>Dawson</b>	250:12
141:5	140:19	227:9	296:21,25	304:25
<b>critical</b>	141:12	239:4	<b>day</b> 8:1,3	305:2
36:20 37:8	142:23		9:25 18:1	312:25
37:17	143:18	<b>D</b>	25:20	<b>deal</b> 88:17
<b>criticized</b>	144:18	<b>D</b> 3:1 4:1	26:25	130:16,19
250:20,23	151:8,16	<b>D&amp;C</b> 191:16	33:12,23	130:24
251:24	151:19	191:17	35:17,23	178:24
276:23	174:18,24	<b>DA</b> 214:14	36:4,14	269:23
<b>criticizing</b>	190:1	<b>DA's</b> 20:17	39:21 40:7	273:15
313:3	220:24	34:10,21	50:3 68:8	<b>dealing</b>
<b>cross</b> 42:5,6	233:2	124:10,18	83:5 94:16	141:3
275:6	237:10	214:12,17	118:11	177:21,23
<b>crossed</b>	245:3,16	238:15	139:10	178:23
275:12	245:25	<b>daily</b> 166:5	147:17	225:16,20
<b>CRR</b> 316:24	246:20,25	166:14	148:7,8	<b>dealt</b> 88:18
<b>cry</b> 121:3	247:21	293:9	175:14	177:17
154:23	248:1,7	<b>damage</b> 41:9	182:9	<b>death</b> 7:13
155:15	249:9,14	<b>damages</b>	184:19	20:16,20
<b>culpability</b>	249:19,21	140:11	185:18	27:5,11,16
72:13,17	249:24	<b>Daniel</b> 1:6	186:17	40:20
73:21	250:20	7:13,24	189:6,9	41:18,22
<b>cup</b> 185:7	279:19	110:3,16	192:19,22	42:4,18
<b>curious</b> 79:3	<b>Curtin's</b>	110:20	192:24	43:13,24
212:19	141:13	111:1	195:23	45:12,17
256:6	246:3	114:12	215:23	45:23

46:14,19	172:20	<b>delaying</b>	90:25	294:20
46:25 58:3	<b>decided</b>	218:15	91:11,22	307:22
62:22	61:12	<b>delibera...</b>	91:24 92:9	312:2
64:11	75:11,13	139:11,14	92:14 93:7	<b>departme...</b>
70:12,25	147:5	<b>delirium</b>	96:12,19	95:15
71:23	148:14,21	78:22	96:21	113:22
72:12 73:4	223:10	119:14	97:24	213:11,15
73:11,18	228:5	182:19	99:13,22	213:24
73:20 74:8	307:4	188:3	100:6,24	235:7
74:10,18	313:5	<b>deliver</b>	101:21	<b>dependent</b>
74:22 75:1	<b>deciding</b>	227:19	102:20	162:24
75:7,24	234:8	<b>delivered</b>	106:10,24	<b>depends</b> 67:9
76:11,13	<b>decision</b>	215:18	111:4	172:12
76:17	73:15	309:4	128:8,21	<b>deposition</b>
110:3,10	168:5,8	<b>delve</b> 108:17	129:5	1:15 5:22
118:8	169:1,8,17	<b>demand</b> 211:7	131:14	6:22 28:8
119:13,25	169:23	<b>Democrat</b>	152:13	42:25
127:21	170:9,21	193:9	162:8	220:10
136:13	171:18	312:23	169:24	315:13
137:19	222:18	<b>demonstr...</b>	178:4	316:10
140:12	223:9,14	103:7,11	194:16	<b>depositions</b>
162:11	249:8	103:17	200:15,15	6:1,4
168:7,22	304:17	104:1,7,22	204:14	<b>deputy</b> 3:14
169:1,3,13	<b>decisions</b>	106:18	206:7,19	52:19
169:19	126:2	168:24	207:9,10	63:17,18
170:23	<b>decline</b>	169:7	209:24	63:19,21
182:21	243:20	170:6,17	210:12,22	81:5,13,19
189:21	<b>declined</b>	177:20,22	211:8,9,12	82:2,16
190:10	208:6	<b>demonstr...</b>	212:5	83:2 85:2
197:23	<b>declining</b>	178:16	213:17	91:16
198:20	208:11,19	<b>denied</b>	215:1,10	106:8,13
207:23	<b>deeply</b> 224:1	102:10,12	217:25	111:18
208:7,17	224:11	102:23	218:15	116:14
209:21	<b>definitely</b>	<b>deny</b> 229:9	219:6,7	117:1,6,20
231:24	29:14	277:14,14	231:12,25	118:16
255:2	70:14 72:5	<b>denying</b> 69:3	236:21	119:15
258:8	273:17	300:18	241:17	121:2,16
261:24	295:9	<b>department</b>	244:8	143:16
274:21	<b>definitive</b>	7:18 19:14	245:5,11	146:12,18
305:8,14	125:11,18	23:11 37:7	246:12,14	146:24
<b>deceive</b>	127:24	39:19	250:8	147:12
139:11	<b>definiti...</b>	50:24	251:3	148:10,23
<b>December</b>	135:24	51:25 52:3	257:4	149:3,25
1:16 30:11	<b>degree</b> 65:10	52:9 60:21	258:24	150:10
<b>deception</b>	90:2	62:5,5	259:2	151:15
301:20,25	<b>delay</b> 90:8	65:15 82:7	277:1	153:14
<b>deceptive</b>	143:10	82:9,11	278:17	154:4
139:3	144:12	83:6,15,21	279:11,11	163:9
<b>decide</b>	247:6	86:15	279:14	164:3
170:25	<b>delayed</b> 90:4	88:12	290:3	176:8

177:4	<b>designee</b>	78:11,14	42:3 46:3	228:12,18
178:7	162:12	78:24	67:3 77:3	<b>dining</b>
206:1	<b>despite</b>	101:9	89:20 92:7	265:25
226:13,16	260:8	129:19	92:21	<b>direct</b> 3:2
227:23	<b>destroy</b>	142:18	103:23	5:7 43:3
228:10,21	284:7,9	182:18	118:2,4	67:13
228:25	<b>detail</b> 25:25	208:13	119:17,20	83:25
246:1,10	105:25	<b>determining</b>	126:3	138:10
259:12,13	237:8	108:4	137:25	157:16
269:17	302:9	168:21	139:15	179:8,20
273:11	<b>detailed</b>	<b>developed</b>	140:22	191:3
290:4	307:15	215:19	150:9	193:2
301:11	<b>details</b>	<b>deviate</b>	151:13	241:7
302:1	207:5	204:7,8	155:23	305:4
303:21,25	210:16	<b>deviation</b>	158:2	308:20
304:4	287:2,12	55:14	161:15	<b>directed</b>
308:22	301:6,8,10	<b>die</b> 20:14	177:23	246:22
310:2	302:23	240:18	179:19	<b>directing</b>
312:9,21	<b>determin...</b>	<b>died</b> 41:4,23	186:1,9	102:20
<b>describe</b>	34:25 35:3	43:21	190:17	195:5
24:19,24	35:8 59:13	44:10,19	196:16,16	<b>direction</b>
110:23	74:15	46:9 72:25	198:16	129:22
154:19	75:16,17	77:25	202:11	166:21
155:11	84:25	78:12 79:4	211:17	<b>directive</b>
195:12	85:23,25	107:23	212:5,8	125:24
253:22	113:18	111:25	231:10	129:17
<b>described</b>	119:12	156:7	235:18	134:8
24:15	120:12	187:10	236:12	137:4
25:16,25	128:22	188:23	239:3,6	144:25
26:22	164:1	192:3	249:5	168:10
34:15	209:4	193:11	251:9	204:13
116:24	279:1	296:23	253:14,15	244:9
128:17	306:13	<b>differed</b>	255:4	245:22
142:13	<b>determine</b>	262:18	258:3	246:6,8,11
150:2	42:17	<b>difference</b>	263:24	246:15,18
154:20,24	45:11,22	34:20	268:1	250:17
155:16,22	46:5 74:4	80:13,15	269:3	<b>directly</b>
155:24,25	93:24	133:17,21	270:1	66:13,18
182:25	128:4,13	155:11	275:17	66:19 69:7
197:5	128:16	186:14	289:25	96:18,20
<b>describing</b>	162:25	223:6	295:17	97:11,22
25:4 127:1	<b>determined</b>	267:15	306:21	97:25
139:4	16:20	269:12	<b>differently</b>	98:16
155:18	43:13 46:9	283:5	87:10	100:3
231:17	46:18	<b>different</b>	117:22	128:8,9
<b>description</b>	71:23 74:8	6:16 10:2	149:18,23	129:2
3:8 4:2	74:13	12:9 19:10	150:5,17	144:13
25:11	75:14 76:1	23:10	178:21	180:16
138:19	76:15	30:19	186:7	211:15
253:25	77:25	34:10 41:9	214:9	<b>director</b>

66:24	121:10	69:11	271:22	254:4
67:23	123:16	71:11	272:7	<b>district</b>
149:4	125:7	201:9	286:8	27:8 34:1
176:9	291:8	225:12	300:25	35:7 207:3
190:25	<b>disclose</b>	309:1	<b>discussions</b>	<b>disturbed</b>
245:10	49:14	<b>discussion</b>	9:16 36:8	111:17,21
262:23	197:10	9:15 10:7	90:24	<b>disturbing</b>
297:6	284:23	10:8 14:22	91:10,21	38:13
305:20	288:11,17	32:18,25	92:9	112:9
310:8	314:25	46:2 48:2	103:19,23	127:12
<b>disagree</b>	<b>disclosed</b>	48:13	103:24	182:15
121:7	49:10	50:15	104:5,17	183:4
134:6	<b>disclosing</b>	68:20 69:6	104:21	<b>diversity</b>
138:24	240:11	70:20,22	106:3,7	226:21
243:7	278:10	78:4 81:24	138:1	229:5
268:10	<b>disclosive</b>	82:1 87:7	209:24	<b>diverted</b>
273:1,17	150:2,13	91:13	210:9,14	89:12
283:12	150:20	103:15,16	211:20	<b>division</b>
285:1	152:2	106:9	224:15	194:2
289:4	<b>disclosure</b>	108:15	225:15	<b>doctors</b>
290:12	81:10	109:5	239:1	43:12
<b>disagreed</b>	169:7	118:14,23	260:5	<b>document</b>
141:24	170:15	119:7,15	279:9	3:15 54:1
222:20	<b>discover</b>	121:9,14	<b>disoriented</b>	89:10
223:20	262:2	121:17	185:24	141:11
267:6	<b>discrepancy</b>	122:4	<b>dispense</b>	157:14
285:4	217:24	123:16,17	5:21	159:4
289:14	<b>discuss</b> 77:6	123:22	<b>dispute</b>	237:7
<b>disagree...</b>	130:3	136:10,14	130:8	303:23
252:14,17	136:5	139:24	218:5	310:4,23
252:20	142:8	140:4,9	253:16,17	310:24
273:16	178:3,7,10	142:16	253:22,23	<b>document...</b>
<b>disappoi...</b>	184:9	145:23	254:6	143:25
224:2,12	189:22	146:5,10	255:9	144:2,15
226:1	212:23	146:13	<b>distinct</b>	<b>documents</b>
<b>disc</b> 95:21	213:3	171:18	12:11	8:8,11
95:24	227:18	176:17	21:22	34:23
<b>discipli...</b>	235:9	185:10	108:1	79:13
94:9 125:9	262:17	189:10,10	<b>distinction</b>	80:11,22
146:6,10	268:7	203:16	34:14	84:5 153:3
<b>discipline</b>	<b>discussed</b>	210:16	133:20	269:22
55:2	49:18	212:10,10	134:12	274:7,22
122:21	68:17	223:1	216:7	276:20
123:5,24	132:4	225:6	290:7	293:15
125:17	140:2	245:12	<b>distinct...</b>	302:13
126:18,21	218:24	248:20,22	139:21	303:25
219:13	225:9	251:1	<b>distress</b> 9:3	<b>dog</b> 14:21
<b>disciplined</b>	236:22	255:13	11:18,19	55:17
221:11	287:2	264:22	11:22	<b>doing</b> 32:13
<b>discipli...</b>	<b>discussing</b>	268:18	22:14	49:25

112:8	158:10,17	64:17 71:5	<b>either</b> 29:3	119:3
113:12	158:18,20	73:7 83:5	34:1 61:3	144:3
126:6	159:11	86:16	96:25	151:14
131:16	160:21	140:18	98:10	157:21
137:22	161:8,10	197:5	100:23	167:4
145:2	162:5	221:4	101:16,18	237:9
198:1	163:11	236:22	157:6	247:8,17
199:6	164:3	243:11	237:23	247:18,25
200:20	166:4,9	255:21	298:21	248:4
201:1,8	309:4	268:20	<b>election</b>	249:10
202:5	310:2	283:11	282:6	251:20,20
203:18,22	<b>drafted</b>	288:21	<b>elections</b>	270:10,12
230:19	161:17	291:7	313:16	278:10,13
252:10	165:12	307:13,21	<b>elevator</b>	279:6,11
254:4	<b>draw</b> 216:7	310:18	68:10,11	290:2
285:8	<b>drawing</b>	<b>early</b> 8:2	68:16	291:6
299:6	34:14	17:1 53:14	69:10	305:16,19
304:12	134:12	79:10	256:2	306:13
<b>DOJ</b> 75:17	139:21	80:21 81:8	271:14,15	311:25
<b>dollar</b>	<b>drive</b> 95:4	109:11	271:23	312:1,4,15
212:17	147:14	190:11	272:2,5	<b>emailed</b> 95:3
<b>Don</b> 313:17	<b>driven</b> 41:2	212:11	273:3	158:20
313:22	<b>driving</b>	248:22	277:8	159:9
314:8	147:13	291:2	280:1,2,5	279:18
<b>door</b> 52:11	<b>drug</b> 12:5	<b>easier</b>	287:7,8,20	302:8
59:2 266:6	37:14	153:12	287:23	<b>emails</b> 151:8
<b>doorbell</b>	44:14,23	<b>Easter</b> 68:2	289:16	247:16
28:6	118:8	68:8	<b>email</b> 3:9,11	248:2
<b>doors</b> 68:16	156:7,22	<b>edit</b> 149:6	3:12,18,19	249:7
69:9	231:8,16	<b>editing</b>	3:23 8:15	312:11,14
<b>download</b>	232:3	157:14	48:23 49:7	<b>Emerg</b> 2:2
299:3	240:25	<b>edits</b> 159:3	49:15,17	5:12
<b>Dr</b> 226:6,9	<b>drugs</b> 41:2	<b>effect</b> 92:15	49:22	<b>emphatic...</b>
226:16,21	114:25	150:12	50:14 54:2	246:21
228:1	115:13,18	180:25	54:6,18,22	<b>employment</b>
229:23,25	<b>due</b> 12:13	199:13	57:17,20	304:6
230:3,4,7	28:6	228:23	61:3,7,14	<b>encounter</b>
230:12,20	<b>duly</b> 5:3	252:13	62:4,8,20	7:17,23
230:25	<b>duties</b>	257:2	62:23 63:1	8:5,14,23
<b>draft</b> 3:14	211:24	282:13	63:10,15	22:3,18
148:24	<b>dying</b> 193:19	284:18	64:8,24	23:8,14,23
149:6	193:24	289:23	65:5 66:1	107:22
151:3,17	231:8,16	<b>effort</b> 210:9	67:16	110:5,25
151:20		210:18	78:16 83:1	<b>encourage</b>
152:22	<b>E</b>	211:4	83:3 88:2	263:5,7
153:22,25	<b>E</b> 2:1,1 3:1	212:1	95:11	282:23
154:3,8,22	3:1 4:1,1	<b>eight</b> 259:24	98:10	<b>encouraged</b>
155:6,14	316:1,1	295:4,8	109:20,25	226:13
156:4,4,16	<b>earlier</b>	302:7	110:2,2	281:25
157:3,4,20	23:18	305:22	116:5	282:5

283:2,6	227:14	<b>examination</b>	189:20	62:3 82:25
<b>ended</b> 192:1	260:6	5:7 277:16	191:4	109:19
193:19,24	<b>ESQ</b> 2:6,7,9	<b>examined</b> 5:6	192:17	116:3
273:23	2:15,17	<b>examiner</b>	243:24	131:21
292:11	<b>established</b>	45:16,22	247:6	150:23
<b>ends</b> 160:23	173:20	46:5,9,18	296:13,14	151:2
190:4	176:13	58:3 59:13	296:18	152:5,5,15
<b>enemies</b>	<b>estate</b> 6:3	64:11	312:19	153:6,21
260:6	<b>estimation</b>	70:11,22	<b>exchanges</b>	156:19
<b>enforcement</b>	120:3,4	71:9,22	279:6	157:19
37:20	242:8	72:19	308:22	160:22
138:7	<b>Evan</b> 296:21	76:13,15	<b>excited</b>	164:13
<b>engage</b>	296:25	77:25	78:22	167:2
211:19	<b>Evans</b> 281:22	78:11,14	119:14	186:22
<b>engaged</b> 11:5	<b>evening</b>	78:15,17	182:19	187:1
14:13 22:2	147:19	78:23	188:3	189:17
<b>enlarge</b>	243:17	119:10,12	<b>excuse</b> 219:8	193:16
30:15	251:14	288:1	<b>executive</b>	195:1
<b>enmeshed</b>	299:10	305:21	123:23	196:20
123:17	<b>event</b> 50:19	306:6	124:15,21	204:16
<b>enraged</b>	52:16 53:3	<b>examiner's</b>	124:23	220:10
241:9	181:9	45:2,6,10	125:6	236:25
<b>enter</b> 107:9	191:14	46:21	129:20	237:7
107:20	<b>events</b> 48:18	62:22 79:4	136:19,20	238:1,3
<b>entire</b> 39:12	49:2,10,14	110:9	136:23	257:13
89:22	50:24 74:8	119:2,9	137:9	293:18
147:1	186:19	120:12	195:10,13	294:24
155:21	252:14	261:24	195:14,19	296:12
227:3	<b>everybody</b>	277:16	195:23	298:3
269:15	117:11	278:11,21	196:5,10	307:8
291:12	252:4	279:1	196:23	312:6
293:22	269:3,6	287:3,13	197:21	<b>exhibits</b> 3:5
310:4	<b>everybody's</b>	287:18,25	198:4,8,10	3:6,8 4:2
<b>entirely</b>	269:8	305:16	198:17,25	4:13
231:10	<b>everyone's</b>	<b>example</b>	199:4,13	<b>existed</b>
<b>entitled</b>	218:6	49:23	199:18	313:2
142:2	<b>evidence</b>	74:10	201:14,14	<b>existence</b>
<b>entity</b> 124:7	76:23	86:17	201:23	196:12
136:24	144:10	126:3	202:2,12	<b>exists</b>
201:2	<b>exact</b> 229:11	213:18	202:13,21	217:24
<b>entries</b>	242:22	302:5	203:2,5,7	<b>expansive</b>
308:20	267:23	<b>examples</b>	203:13	260:11
<b>entry</b> 43:4,8	<b>exactly</b>	290:24	204:7	306:22
83:25	19:23	<b>exchange</b>	215:2,11	<b>expect</b> 26:21
<b>EO</b> 131:7	118:20	3:23 4:12	216:5,8	50:13 59:3
<b>error</b> 249:21	149:11	62:8,14,16	296:8	166:5,9
<b>escapes</b>	242:4	64:2,25	<b>exhibit</b>	172:7,9
112:12	253:8	151:8,15	30:11 43:1	295:20
<b>especially</b>	255:10	187:3,5	54:2 57:16	<b>expectat...</b>
183:15	274:5	188:6,6,11	61:24,25	172:2

<b>expected</b>	150:4	54:13 87:5	295:13	172:21
36:23 37:2	283:4	87:17	298:13	173:2
38:5,14	<b>expressed</b>	<b>fact</b> 15:22	304:20	216:22
50:8	106:16	24:4 39:23	<b>factor</b> 234:9	218:8,9
149:18	107:8	43:21,23	246:24	243:14
160:24	108:13	47:24 48:8	249:8	246:9
161:14,18	117:16	56:24 63:5	<b>factors</b>	249:20
161:24	128:17	70:1 76:19	76:16	255:6,7,15
295:22	141:1,13	105:1,8	78:25	283:24
<b>experience</b>	176:25	107:3,7,11	182:20	<b>fairly</b>
52:15 53:3	243:10	107:12,20	192:3	196:22
92:18	275:17	108:6,13	234:8	303:24
102:18	280:10	114:24	247:1	<b>faith</b> 233:20
<b>experien...</b>	<b>expressing</b>	120:12	<b>facts</b> 168:6	<b>family</b> 49:24
186:12,17	117:9,11	125:4	168:20,22	54:14 61:5
231:8,16	<b>expression</b>	129:18	169:2	61:8 74:3
<b>explain</b> 62:1	258:15	130:4	170:22	79:11
94:16	<b>expressly</b>	133:5	<b>factual</b>	80:20 81:9
135:22	118:11	135:23	253:17	81:18
141:18	258:22	139:25	257:17	83:23 84:5
238:19	<b>extend</b> 61:5	143:15,23	258:2,3	87:3,13
243:13	<b>extensive</b>	147:2	<b>failed</b> 231:2	92:4
293:6	35:13	149:17	250:9	104:20
<b>explained</b>	260:4	150:12	251:3	105:8
132:5	274:24	158:23	284:23	107:1,8,11
133:6	303:24	166:19	288:11,17	107:18
182:15	<b>extensively</b>	169:24	314:18	108:6,13
221:6	116:21	170:10,13	<b>failing</b>	130:5,13
241:17	<b>extent</b>	175:2	224:2	130:20
251:2	238:12,21	177:11	226:2	131:4
<b>explaining</b>	279:9	178:4,10	<b>failure</b>	140:1,6,10
92:4	<b>extremely</b>	180:10	233:13	141:16
119:20	10:17	183:3	249:6	142:1,11
<b>explanation</b>	<b>eye</b> 37:17	196:8	<b>fair</b> 12:11	142:17,23
144:17	<b>eyes</b> 164:17	199:22	13:14	143:7,11
161:12,23	164:22	206:12	25:12	144:13,22
186:4,7,8		207:10	26:17	147:20
217:19	<b>F</b>	208:19	28:16	167:21
<b>explicitly</b>	<b>F</b> 269:8	227:3	33:24	169:16
136:1	316:1	240:11	46:15 49:5	173:22
218:20	<b>fabric</b>	242:7	49:11	174:14,20
228:24	233:19	244:10	53:12,23	174:25
277:11	<b>face</b> 120:1,5	246:11,20	60:24	175:3,5,11
283:20	181:21,21	247:5	72:13	175:16,17
<b>exposure</b>	276:10	253:25	91:19 96:8	176:12,20
169:15	<b>face-to-...</b>	259:20	108:3	177:7,14
234:14,14	225:7	261:23	123:15,19	178:1,4,11
<b>express</b>	<b>Facebook</b>	273:8	127:11	179:10,23
48:25	51:20	278:9	138:15,21	182:5
137:17	52:22,23	287:6	168:16	183:12,18



204:11	284:14	267:2	205:5	<b>FOERSTER</b>
208:16	290:21	<b>finished</b>	213:9	2:12
209:25	297:15	200:5	214:22	<b>FOIA</b> 233:3
210:10,15	302:2	235:17	228:22	<b>FOIL</b> 80:4
210:19	<b>Fifth</b> 2:4	<b>fire</b> 226:13	229:17	83:11,15
211:11,20	<b>figure</b> 90:1	228:6	262:2	84:4 130:4
212:2,17	240:23	<b>fired</b> 227:24	275:2	131:1
233:3,20	<b>figured</b> 90:7	280:15	276:1	140:23
<b>family's</b>	90:9	<b>firm</b> 5:12	304:19	141:1
50:5 61:4	243:12	188:17	305:18	144:21
83:12	<b>file</b> 116:7	276:17	306:25	145:4,7
143:13	<b>filed</b> 107:1	<b>first</b> 5:2	<b>five</b> 20:6,6	179:14
144:8	107:19	7:22 8:22	55:22 69:9	210:6
174:3	108:7	9:21 10:19	182:10	212:14
175:1	140:1,7,16	11:3,7,12	185:8,9	<b>folks</b> 53:17
187:20	183:12	11:17	256:12	66:14
191:13	281:14	12:14 13:2	308:5	88:11
210:13	<b>filing</b> 211:4	13:25 14:7	<b>five-minute</b>	219:1
212:12	<b>fill</b> 263:20	14:15,25	256:16	266:8
<b>far</b> 121:3	<b>filled</b> 93:20	15:7,9,13	<b>five-to-...</b>	273:16
148:20	<b>filling</b> 51:6	16:1,4,10	189:10	<b>follow</b> 45:21
154:23	<b>final</b> 152:10	21:16 43:4	<b>flat-out</b>	51:21
155:15	153:17	51:13	277:14	52:23,24
206:15	154:10	63:14 64:2	<b>Floor</b> 2:4	54:16
<b>fatigued</b>	155:3	64:9 70:24	<b>flowed</b>	137:4
6:20	156:13,16	71:3 78:5	310:10	206:19
<b>fault</b> 115:13	156:18	78:10,13	<b>flowing</b>	<b>follow-up</b>
254:23	158:2,4	79:15,19	103:17	15:13
<b>FBI</b> 72:23	159:18	80:25	<b>Floyd</b> 103:5	49:17,22
75:16	161:4,12	81:17	103:12,18	50:14,14
<b>feel</b> 139:3	162:1,16	83:10,21	104:2,7,23	224:18
149:5	163:3,17	83:25	106:5,18	<b>followed</b>
172:12	164:14	84:22 85:3	169:1	48:23
197:10	166:8	85:15 86:3	170:8	113:4
258:11	<b>find</b> 39:13	87:17 91:5	225:21,21	<b>following</b>
268:3,5	185:18	91:20	<b>focus</b> 10:19	151:4
283:20,21	217:23	92:23	31:6 55:1	168:25
283:23	281:23	107:3,18	62:16	234:25
284:4,4,15	305:5	111:17	151:1	<b>follows</b> 5:6
284:16	<b>finding</b> 47:2	120:16	152:21	<b>fools</b> 284:19
<b>feeling</b> 6:20	63:12	146:9	167:19	<b>footage</b> 36:6
170:19	76:13 85:5	150:3	207:22	36:10 38:6
<b>felt</b> 94:13	261:24	151:1	295:2	54:25
150:1,16	<b>findings</b>	167:3	<b>focused</b>	88:13,21
150:17	45:5,6	168:4	221:25	88:24 91:2
166:23	242:18	171:17	<b>focusing</b>	92:11,19
183:3	<b>fine</b> 32:7	181:21	29:21	96:12
251:24	41:16	192:11	31:17	97:17 98:1
269:12	145:16	195:18	153:20	102:3,19
282:17	256:13	197:3	167:3	102:21

110:5	<b>formalities</b>	<b>frame</b> 88:6	295:6,7	204:9
130:5,6,18	5:21	114:25	297:23	218:20
131:8	<b>formally</b>	141:8	<b>function</b>	219:18
132:4,7,10	77:13	<b>Frank</b> 66:4	206:10	220:2
132:18	<b>forms</b> 302:7	<b>frankly</b>	<b>fundamen...</b>	221:16
133:8	<b>forth</b> 9:13	160:24	121:6	223:11
134:10,13	82:8	<b>freedom</b>	138:24	235:13,14
135:18	179:14	81:10,17	228:11,17	235:22
137:13	205:25	88:7 141:4	243:6	236:5
140:21	210:23	141:6,15	252:17	238:14
141:16	259:18,19	142:10	272:25	245:21
142:22	260:9	143:4	273:18	<b>General's</b>
143:11,14	279:10	<b>frequency</b>	274:19	27:14 34:2
144:13	<b>forthright</b>	41:19	283:12	77:20
162:10	85:7	<b>Friday</b> 62:10	285:1,4	113:21
163:4,12	197:12	68:1 298:9	289:4	122:13
167:22	<b>forward</b> 88:1	298:9,14	290:9,12	123:18
168:4	162:7	299:10	290:14	124:2,8
173:23	200:18	<b>friend</b>	<b>further</b>	125:4,16
174:2,19	234:1,9,24	233:17	156:3	126:23
174:25	235:5,11	313:19	193:3	127:6,21
175:3,4,10	241:9,12	<b>friends</b> 87:3	231:22	128:5,15
175:16	241:24	230:4,5	315:4	129:2,14
176:11	249:6	<b>front</b> 30:22	316:14	130:22
177:6,12	257:4	176:25	<b>future</b> 282:6	131:11,15
178:1,11	273:6	196:6		132:6,17
178:15	280:25	197:12	<b>G</b>	133:7,14
181:10	281:2	201:19	<b>G</b> 3:1 4:1	134:9
212:14	298:25	304:8	<b>gathered</b>	136:3,6,17
247:7,24	299:14	311:24	303:25	137:1,4,11
248:9,22	314:16	<b>froze</b> 112:17	<b>general</b>	137:23
313:5	<b>forwarded</b>	<b>frustrated</b>	42:11	140:20
314:19	50:4	147:2	77:13	142:12
<b>force</b> 1:6	247:25	148:16	86:15	143:12
14:9 50:9	299:10	<b>frustration</b>	91:14	159:14
93:19,20	312:2,4	117:9,16	105:6	160:1
93:21	<b>forwarding</b>	148:19	113:23	168:10
101:3	110:4,8	149:16,20	123:6,22	176:19
224:20	193:8	<b>fulfilling</b>	124:6	179:9,12
284:24	249:21	233:3	128:9	179:21
288:12,18	<b>found</b> 73:21	<b>full</b> 6:10	133:24	183:9
<b>forcibly</b>	82:20	31:19	136:24	184:4
193:10	156:19	280:3	138:3	196:9,24
232:5	241:23	<b>fully</b> 150:2	149:5,14	196:25
<b>foregoing</b>	288:1	150:13	149:15	197:4
316:9	<b>foundation</b>	152:2	150:24	198:11,12
<b>forensic</b>	233:19	224:2	160:13	199:11,23
188:16,17	<b>four</b> 234:22	226:2	180:1,7,14	202:3,4,6
<b>form</b> 69:19	<b>fourth</b>	231:2	180:24	203:8,9,12
93:20	229:20	292:2	203:25	203:14

204:1	104:2	164:6	186:21	58:16 59:1
205:22	106:18	165:4,7,17	195:12	61:24 62:7
206:10	169:1	168:14,15	197:13	62:15 70:3
214:7,18	170:8	168:19	207:5	71:12 75:1
214:25	225:21,21	177:5	210:23,24	75:12,13
215:3,12	<b>getting</b> 18:7	199:23	222:7	75:24 79:9
216:9,10	34:16 70:4	214:3	234:18	80:5 82:8
216:11	74:7	217:20	237:8	82:24
217:14	126:16	246:12,15	238:3,6	83:16
218:14	176:20	246:18	243:16	91:22 93:3
219:2,11	189:25	250:17	256:4	98:19,25
234:5,23	192:1	294:14	257:14	100:13
235:5	197:16	296:6	258:12	101:24
236:1	200:10	300:14	259:3	105:24
241:18,19	219:9	306:3	264:2	107:12
242:6,8,11	247:7	<b>gives</b> 203:7	267:6	108:17,18
243:18	289:13	253:2	268:21	108:23,24
<b>generally</b>	300:4	<b>giving</b> 31:1	269:23,25	109:18
17:22	<b>Ginny</b> 293:20	159:5	274:6	111:8
49:16	<b>gist</b> 122:5	221:5	281:1	113:15
51:18 61:1	248:15,18	300:6	291:15,16	114:2
65:13	<b>give</b> 6:10	<b>glitch</b>	291:17,23	125:17
66:22,22	7:1,6 9:19	237:19	292:3	143:13
74:3 92:20	12:20 40:7	<b>go</b> 6:6 9:16	293:14	147:11
116:7	44:8,17	12:23	294:21,24	150:23
124:9	56:15	15:15	301:12,17	152:1,3
171:6,16	58:18 93:2	20:20	304:21	160:4
194:17	129:17	21:15	309:2,6	162:7
207:2	169:11	30:20 35:5	<b>goes</b> 152:5	167:22
<b>Generals'</b>	181:9	57:15	162:24	174:9
216:6	200:25	61:24	202:3	179:14
<b>gentleman</b>	203:20	66:14 88:2	270:8	180:9
8:24 9:24	204:2,3	91:14	271:9,15	183:15
10:10	221:3	94:17 95:4	291:4	186:21
20:13	222:9	95:14	<b>going</b> 6:8	187:24
31:21	243:3	96:20	7:2 8:7,9	191:3,14
32:19	253:2	98:25	8:19 9:8	192:17
36:11	254:19	105:24	12:23	194:25
37:13 41:1	267:1	114:8	13:23	195:5
42:15	271:4	128:2	15:14,15	196:19
43:11	278:4	131:13	17:8 21:15	203:12
111:25	290:24	145:16	28:21 30:7	204:3,15
115:13	298:10,10	150:24	30:8,13	205:10
188:2	308:4	152:21	31:6 42:9	208:25
278:4,6	<b>given</b> 18:11	153:15	42:10,20	210:18
<b>gentleman's</b>	39:22	156:3	43:23	211:3
40:24	59:23	163:2	45:11,22	213:5
267:25	105:6	165:6	53:25	220:2,9
<b>George</b> 103:4	127:5	167:1	55:19 57:9	222:13
103:18	130:21	184:25	57:14	223:15

225:22	264:20	218:11	39:18	108:1,9,12
226:7	<b>governor</b>	235:20	65:16	111:15,23
227:7	124:7,25	237:25	136:3	120:7
228:21	125:1	240:10,15	148:20	146:4
230:8	129:19	240:22	195:9	175:13
237:8	<b>governor's</b>	275:2	196:3,24	206:8,8
238:6	125:5	277:19	197:15	227:2
248:24	<b>grabbing</b>	<b>guidance</b>	198:13	234:15
250:11	185:7	114:4	200:9	241:14
257:12,13	<b>grand</b> 35:5,6	132:9	214:6,8,24	242:22
263:13,15	160:11	<b>guided</b> 201:5	314:13	250:16
264:2,22	<b>great</b> 7:9	<b>guilt</b> 164:2	<b>handling</b> 1:5	251:19
264:24	24:17	<b>guy</b> 29:9	124:18	255:11
266:10,15	47:20	112:20	128:10	263:25
270:5	55:21	191:21	149:17,21	266:4
272:11,19	185:6	193:18,24	180:23	280:6,9
273:12	302:9	254:24	197:25	287:6,8
274:25	313:19	268:14	201:3	288:7
275:9	<b>greatly</b>	271:5	260:3	295:21
279:10,24	164:6,15	292:21	293:10	309:21
282:14,14	165:17	<b>guys</b> 185:4	<b>hands</b> 13:7	<b>happening</b>
284:1,4	<b>Gregory</b>	201:16	24:2 72:25	19:7,13
288:7	41:11	263:25	239:9	29:17 91:7
289:8,18	<b>Grimaldi</b>		<b>hands-on</b>	91:18
291:11,12	1:17 5:3	<b>H</b>	238:12,21	230:23
291:15,15	316:5,24	<b>half</b> 31:12	<b>happen</b> 10:3	248:22
291:16,17	<b>grossly</b>	82:5 148:1	29:15 33:6	252:1
291:19,23	156:8	<b>halfway</b>	42:8 61:1	288:6
291:24	<b>grounds</b>	312:25	61:16,17	300:23
293:14	307:3	<b>Hall</b> 68:16	70:15 88:3	301:7
295:2	<b>Gruber</b>	69:10	94:24	<b>happens</b>
296:12,15	281:22	148:4	99:16	41:19
303:1	299:5,6	277:8	111:12	115:14
307:9,15	<b>guess</b> 34:13	<b>hand</b> 316:20	146:20	<b>happy</b> 250:14
309:5	63:15 67:2	<b>handcuffed</b>	149:19	<b>hard</b> 300:2
312:6	69:19	86:22 87:4	221:10	<b>head</b> 14:2
313:14	75:18,21	88:9,14	226:25	24:9 57:4
314:1	79:1 86:2	90:18	289:11	65:3,6
<b>good</b> 5:9	94:10	<b>handcuffing</b>	<b>happened</b> 8:2	67:7 112:7
68:1	95:10	87:12	18:9 19:2	112:8
108:21,25	138:25	88:21	38:1 50:10	120:18
290:16	149:10	<b>handcuffs</b>	50:16 56:3	233:10,10
310:6,14	161:11,22	13:10 24:5	56:21,23	254:5
311:7	165:11	26:11,13	61:19 74:2	267:25
315:6	186:15	239:10	79:16	268:1
<b>government</b>	198:15,21	<b>handle</b> 70:3	96:18 97:7	281:19
104:6,18	198:23,24	71:12	97:9 98:4	<b>headed</b>
104:21	204:17	199:20	98:8,15	147:20
106:4	211:1	206:22	101:14	<b>health</b> 7:13
109:11	216:4	<b>handled</b>	102:7	9:2 11:21

11:21 12:2	145:23	176:18	59:25 60:9	212:11
12:4,10,13	185:10	204:17	69:14,24	213:4
13:23 32:6	256:21	209:3	70:1,6,7	264:24
35:25	260:18	221:24	70:21	<b>identifies</b>
37:14	261:1,11	237:17	72:18 73:8	3:6
39:24,25	<b>help</b> 13:22	304:13	73:10,24	<b>immediately</b>
56:8 57:1	13:24 47:4	<b>holiday</b> 68:1	75:2,3	37:1 112:3
57:6,8,13	157:17	<b>holidays</b>	272:6	115:4
63:7 79:14	158:12	68:3	<b>honestly</b>	148:5
80:22 84:6	196:7	<b>Holy</b> 68:1	294:1,11	163:6,19
104:3,8	311:22	<b>homicide</b>	<b>hospital</b> 9:6	<b>impact</b> 132:8
127:20	<b>helpful</b>	46:10,19	13:24	133:8
173:24	10:18	47:2 50:10	20:14	134:10
186:12,17	26:15	58:4,12,13	26:14	169:6
252:2	33:15 81:6	58:14,21	36:12	170:14
<b>hear</b> 45:5	81:15	59:4,7,14	39:19	177:19
60:6 72:3	94:18	59:18 60:5	156:23	212:13
72:5 79:3	124:11	60:15,17	158:6	<b>impaneled</b>
89:6 98:4	153:2,6	60:22	192:2	160:11
100:6,20	163:7	61:13,15	240:17,21	<b>impede</b> 136:6
102:2	<b>helps</b> 244:17	61:21	241:3,6	234:5
266:9	<b>hereunto</b>	64:12	<b>hour</b> 31:12	<b>important</b>
308:16	316:20	70:12 71:1	55:20 82:5	38:24
<b>heard</b> 13:19	<b>Hey</b> 101:13	71:23 72:8	148:1	60:11
14:4 42:12	101:19	72:11,16	256:9	100:1
71:5,19	145:6	72:17,23	265:22,23	171:13
77:24 78:5	285:13	72:24 73:3	<b>hours</b> 8:3	258:19
78:11,13	<b>hierarch...</b>	73:19	162:13,17	<b>impossible</b>
80:19	128:16	74:10,19	162:18	165:23
85:18	<b>hierarchy</b>	75:1,8,23	305:22	<b>impression</b>
88:19 89:2	129:4	75:25	<b>house</b> 264:16	292:10
89:10,15	<b>high</b> 9:7	76:14,25	265:4	<b>improper</b>
91:20	10:10	78:12,16	266:4,8,23	208:10
99:11	11:20	78:21	267:4,13	<b>in-custody</b>
101:13	31:22	119:13,17	<b>How's</b> 230:19	20:16,20
102:14	32:19	119:17,18	<b>HUDSON</b> 1:25	27:5,11,16
143:9	43:11	119:19,21	<b>human</b> 233:17	40:20,20
207:16	90:25	182:18	<b>humanity</b>	41:18,22
260:21	193:18,24	207:24	241:25	42:4 43:24
281:5,9,10	232:19	208:7	<b>hurt</b> 292:8	118:8
<b>hearing</b> 71:6	240:7	242:18	<b>husband</b>	258:8
71:22 81:1	241:1	259:25	147:13	<b>inaccurate</b>
233:25	<b>higher</b>	261:17,25	<b>hygiene</b>	306:12
243:17	128:15	271:16,18	156:6,21	<b>inapprop...</b>
<b>heart</b> 190:3	<b>highligh...</b>	280:5	240:19,24	290:21
190:23	236:19	287:9	<b>Hypolite</b>	<b>incidences</b>
<b>heart-wr...</b>	<b>hit</b> 188:15	300:12,19	313:1	34:8 37:6
105:10	<b>hold</b> 55:16	302:8,9		37:9 82:19
<b>held</b> 14:22	104:10	305:9,14	<b>I</b>	102:24
109:5	125:17	<b>homicides</b>	<b>idea</b> 64:23	225:18

<b>incident</b>	298:8	11:4 13:13	82:13	171:3,9
9:23 16:6	<b>incidents</b>	297:22	84:19 88:8	270:17
16:10 19:1	238:13,22	<b>indicated</b>	97:19	278:13
19:4 36:6	257:18	31:22	116:8	<b>informs</b>
37:21,22	<b>incite</b> 227:7	32:22 33:5	131:3	305:20
38:3,4	<b>inciteful</b>	38:13	141:4,6,15	<b>ingest</b> 76:24
40:9,23	227:14	215:1	142:11	<b>initial</b>
41:1 44:6	<b>include</b>	218:20	143:4	10:19,22
50:14 56:3	149:14	242:11	171:13	55:2
57:11,12	150:11,16	278:12,16	174:16	147:24
84:14	259:25	282:17	180:21	151:3
86:16	310:13	290:2	194:6	152:21
87:16	<b>included</b>	<b>indicating</b>	202:24	156:5
88:24 90:5	82:17	93:21	205:20	159:11
90:19 91:2	153:14	131:25	208:12	160:21
91:25 92:5	165:2	300:20	246:6	<b>initially</b>
92:11	166:2	<b>indication</b>	257:18	8:16 162:6
94:25 96:4	227:6	155:22	258:2,3,18	<b>initiated</b>
96:24	248:3	<b>indiscer...</b>	259:4,9	209:24
97:18 98:1	254:22	28:6	276:21	210:12
98:4,7,9	259:24	<b>individual</b>	277:4	<b>initiatives</b>
98:13	306:13	43:10	300:14	15:23
99:21,24	310:25	162:11	301:20	<b>injected</b>
100:8,8	311:15	<b>inflame</b>	302:15	76:23
102:4	312:12,15	178:15	303:3	158:14
104:23	312:17	<b>influence</b>	307:17	<b>ink</b> 151:20
106:2,21	<b>includes</b>	156:7,21	314:20	<b>inquiries</b>
108:6	153:7	<b>infor</b> 131:3	<b>informed</b>	66:1,2
110:16	157:21	<b>inform</b> 59:4	8:13 49:2	307:24
114:19	<b>including</b>	92:2 96:25	64:10,20	<b>inquiring</b>
115:4,9	20:1	97:1,2,10	65:21 94:7	206:2
121:11	106:15	171:1,5	171:19,23	<b>instance</b>
130:18	198:14	182:14	174:21,22	196:21
131:8	<b>inconsis...</b>	224:3	175:2	<b>instances</b>
134:5,14	76:12	226:2	194:7	28:3
138:20	142:23	231:3	203:17	<b>instituted</b>
150:3	<b>incorrect</b>	250:9	211:2	293:8
154:23	128:18	<b>informal</b>	212:3	<b>instructed</b>
155:10,15	207:11,14	125:15	223:17	105:14,18
155:19	207:18	<b>informally</b>	232:1,4,10	136:17
156:9	209:8	281:6	240:12	137:11
159:13	246:24	<b>information</b>	247:22	140:20
161:10	<b>increase</b>	50:5 54:20	261:16,23	200:3
189:8	70:1	61:4,8	278:25	217:14
204:24	<b>independent</b>	65:16 66:5	279:15	235:23
221:1	1:4 5:13	66:8,15	295:18	242:7
227:3	274:8	77:21	297:23	<b>instruction</b>
231:19	276:11	80:12	305:6	142:12,24
291:1,2,4	299:7	81:10,11	310:21,22	217:21
<b>Incident...</b>	<b>indicate</b>	81:18	<b>informing</b>	<b>instruct...</b>

215:3	<b>interface</b>	33:25	234:5	197:16
216:6	97:11	34:16,22	235:10	200:10,18
218:1	<b>interfere</b>	35:11,12	241:20	220:25
<b>integrity</b>	186:18	35:13,19	258:14	238:14
30:5,13	<b>internal</b>	77:14	269:7,19	241:19
31:2	205:1,14	84:13,17	269:20,21	247:8
269:10	206:18	84:20	269:24	278:17
283:18	208:2,25	85:17 86:5	272:10,11	285:20,20
284:7	209:2,9,12	92:13,16	272:13	<b>involvement</b>
<b>intend</b>	234:7	93:6 94:4	273:9,22	286:4,18
197:20	<b>interpre...</b>	105:17	273:23,25	<b>involving</b>
<b>intended</b>	284:10	122:17	274:2,8,13	51:4 52:16
230:1	<b>interpreted</b>	123:14,18	274:17,23	56:4 57:8
284:12	229:1	127:7,16	275:18,18	65:7,12
<b>intending</b>	258:25	127:22	275:23	67:5 70:21
232:13	293:4	128:6,12	276:3,7,12	86:13,17
<b>intense</b>	<b>interrupt</b>	129:12	276:14,24	87:16 90:5
227:15	270:25	131:11,22	278:11	138:20
<b>intent</b>	309:10	132:8	281:2	156:6,21
108:13	<b>interrupted</b>	133:9,25	285:18	<b>issue</b> 17:17
284:7,12	239:17	134:11	286:2,16	21:1 36:17
284:16	<b>interrup...</b>	136:2,7	289:9	37:14
303:1,2	23:1 199:7	137:10,23	292:3	38:17
314:22	<b>interview</b>	142:14	299:7	50:12
<b>intention</b>	4:6 30:4	143:6	<b>investig...</b>	56:19,25
107:8,19	30:22 31:1	144:25	206:24	57:4,9,13
<b>intentional</b>	31:10,17	145:10	213:13	57:13 65:6
250:10,15	32:11,13	160:2	234:7	67:9 84:23
<b>intentio...</b>	131:22	169:25	235:17	87:1 89:21
250:18	132:2,14	170:11,15	<b>investig...</b>	94:4,9
302:23	134:2,15	179:3	5:13 31:15	96:23 97:2
314:18	134:22	181:1	32:3	97:10
<b>interaction</b>	135:13,14	197:2,17	<b>invite</b>	99:11,16
65:2 93:6	135:23	200:5,11	226:24	104:2,8
115:18	299:24	200:19	<b>invited</b>	106:2
116:24	300:6,9,10	201:3	264:11	120:11
<b>interact...</b>	<b>interviewed</b>	204:25	<b>inviting</b>	127:2
93:16	297:4	205:1,6,9	267:3	129:17
<b>interdep...</b>	<b>introduced</b>	205:14,15	<b>involved</b>	130:3
310:5	3:6	205:17	12:17	140:15
<b>interested</b>	<b>investigate</b>	206:3,9,16	22:18 23:7	144:23
62:14	282:9	206:17,18	23:13,16	178:7
138:13	<b>investig...</b>	206:22	23:23 28:4	227:21
199:2	125:5	208:1,25	35:18,25	251:6
213:14	133:24	209:3,9,12	57:5 63:8	262:24
316:17	136:25	209:14,17	84:13	276:1
<b>interesting</b>	<b>investig...</b>	209:20	121:10,23	<b>issued</b> 30:8
102:16	1:4 16:6	214:13	123:12	30:11
<b>interests</b>	20:17 27:8	215:4,12	124:2	81:20
211:13	27:14,20	221:16	156:9	243:19

32:6 48:24	248:23	302:23	245:11	105:7
50:22	249:22	<b>kick</b> 101:6	259:5,9	108:22
53:10 55:3	259:20	<b>kicked</b> 29:9	261:4,8,11	109:2
82:8 86:20	311:8,14	<b>kicking</b> 29:5	279:3,7	110:15
141:5	311:25	267:17,19	280:18	111:24
158:25	312:11	267:21	301:18	112:15,22
194:16	313:20	285:8,14	309:14	112:23,25
232:23	<b>jurisdic...</b>	286:22	313:23,23	113:1,3,7
234:12	196:9	288:23	314:15,24	113:8,11
242:5	198:8,11	<b>kid's</b> 59:2	<b>know</b> 5:11,20	113:11
258:19	198:25	<b>killed</b> 103:5	6:21,23	115:3
263:3	199:10,18	105:11	7:16,24	117:11
267:20	199:24	112:6,20	9:5,6,9,9	118:7
<b>items</b> 260:14	200:2	<b>killing</b>	9:20,22	119:15,23
<hr/>	201:4	103:8,12	12:25	125:23,24
<b>J</b>	202:2	103:18	13:16	126:4
<b>Jackie</b> 66:7	<b>jury</b> 35:6,6	104:2,7,23	15:17 17:3	127:12,13
<b>jail</b> 240:20	160:11	106:5,19	17:5 19:9	127:20
241:6	<b>Justin</b> 62:9	170:8	23:15 28:7	129:18
<b>James</b> 151:4	62:20,25	<b>kind</b> 5:25	28:20,22	138:2,14
180:14	65:10	21:15	31:18	139:13,14
197:6	66:13	41:18	32:17,22	145:8
236:5	67:17	50:12	32:23	147:2,4,5
272:9	245:2,13	60:19 97:6	36:22	147:14
280:11,11	251:23	201:15	37:14,15	151:24
280:15	259:17	206:16	39:15 41:5	157:18
<b>January</b>	262:10	208:18	41:7 49:4	158:22,24
316:21	264:12	230:8	50:11,25	159:23
<b>Jefferson</b>	270:9,11	244:16	52:23	162:20,22
191:22	278:10,13	265:24	54:16	166:3
286:5	278:20,25	304:14	58:16,19	167:24
<b>Jenn</b> 144:4	290:2	<b>kinds</b> 51:23	58:20	170:18
<b>job</b> 59:24	302:16	73:23	59:10,21	171:17
248:7,19	306:5,13	<b>kitchen</b>	59:24	173:19
<b>join</b> 17:23	<hr/>	265:25	60:11 63:7	176:10
<b>joined</b> 28:8	<b>K</b>	<b>kneed</b> 276:10	65:19,22	177:8
<b>July</b> 57:17	<b>KATIE</b> 2:9	<b>knew</b> 39:12	65:23 66:2	179:1,15
61:13	<b>KATOVICH</b> 2:7	85:3,12	66:3,11	179:22
107:2	<b>keep</b> 60:8	115:4	68:8 70:2	180:10,23
313:2	80:10	145:21	70:3 74:4	182:24
<b>jump</b> 308:8	108:18,24	176:2,8,8	74:17,20	183:4,25
<b>June</b> 37:13	173:1	176:8,9,10	75:15 76:4	184:1,24
37:21,22	234:25	178:18	81:3,4,12	184:24
56:4 57:4	266:20	179:12,13	85:10,10	186:1,11
57:25	295:23	194:12	85:13,14	187:18,22
86:16	304:12	210:3,14	86:7 87:9	188:9,10
90:24	<b>kept</b> 183:2,2	222:12	88:4,17	188:10
91:10,22	269:18	231:24,24	91:18 93:3	189:7
247:9,18	273:8	238:9	94:13	190:2,3,22
247:23	296:1	242:25,25	101:20	190:23



191:6	271:13,24	220:5	128:8,20	209:10
192:10	272:1,3,8	232:15	129:5,15	210:19
195:7	272:12,13	273:11	131:14	211:5,10
196:15	272:14,15	285:19	138:7	212:2,6,6
197:1	272:17,22	286:3,17	141:3,6,15	<b>lawsuits</b>
200:13,14	272:22,24	313:24	143:4,5	159:1
206:20	273:1,6,8	<b>known</b> 206:7	152:12,13	<b>lawyer</b> 79:11
208:20	273:15,17	206:12	158:22	80:9 81:8
210:15	274:1,3,3	<b>knows</b> 149:4	159:2	83:13
212:19	274:5,10	224:4	160:18	175:1,11
213:10,12	274:11,12	248:12	163:23	276:16
215:12	274:18,18	271:20	166:20	313:9
218:13,17	274:20	<b>krosenfe...</b>	200:14,19	<b>lawyers</b>
218:19,22	275:5,23	2:9	200:25	131:4
219:23,24	275:24,24		201:7,14	143:13
224:20	276:19	<b>L</b>	204:14	173:22
225:11,17	278:16	<b>L</b> 316:5,24	209:24	174:3,20
225:20	279:5,6,9	<b>La'Ron</b> 39:2	210:12,22	175:18
227:7	280:8,8,18	258:23	211:7,9,12	178:1
228:13	281:1,2	259:1	212:5	210:13,15
229:2,7,18	283:13,25	293:21	213:11,15	210:23
230:14,21	284:15	<b>laid</b> 24:1	213:17,24	211:14
230:23	286:10	<b>language</b>	214:25	313:18
234:3,6,25	289:14,15	154:12,16	215:9	<b>lay</b> 239:9
238:12,21	289:17,18	154:18	217:25	<b>lead</b> 125:22
241:14	290:2,6,17	155:2,5	218:14	257:4
242:22	290:18,19	156:12,15	219:5,7	258:24
248:11,12	291:24	157:1,2,18	231:11	259:2
248:20	292:3,25	157:22	235:7	294:20
249:2	293:1,1,2	158:12	236:21	<b>leader</b>
250:18	293:11,24	164:21,23	241:16	194:16
252:1,2,13	295:20,25	227:6,13	244:8	<b>leaders</b>
252:18	296:2	<b>laptop</b> 95:22	245:4,11	194:1
254:3,8,9	298:11	<b>larger</b> 52:9	246:12,14	281:12,15
256:8,9	302:19,21	65:24	250:8	281:24
260:4,9,17	303:14,22	<b>latching</b>	251:3	293:23
260:25	304:1,21	244:3	278:17	<b>leadership</b>
262:18	311:14	<b>late</b> 50:18	279:7,11	106:15
264:21	<b>knowing</b>	77:10	279:14	169:6
266:14	36:22	86:12	290:3	170:14,19
268:3,14	39:17	<b>laughing</b>	307:22	293:11
268:14,17	66:11	113:7,10	<b>laws</b> 143:2	<b>learn</b> 8:4
268:17,23	301:17	<b>law</b> 37:19	<b>lawsuit</b>	46:17
268:24,24	313:2	62:4,5	79:24	64:14
269:2,2,7	<b>knowledge</b>	81:11,18	94:10	82:22
269:18,21	47:2 62:14	82:7,9,11	108:14	84:12,19
269:23,23	175:7	83:6,15,20	113:19	100:2
269:24	176:23	90:25	114:1	106:11
270:1,3,5	186:16,20	91:11,22	163:24,25	116:1
270:16,23	219:17	113:22	208:3	160:7,10

160:12	291:14,22	<b>letter</b> 3:14	282:23	145:7
174:7	291:23	80:9 83:22	283:2,7	<b>listened</b>
194:10	292:10	147:6,8,8	<b>life</b> 281:5	284:19
209:18	<b>legal</b> 92:2	148:15,21	<b>light</b> 86:21	<b>listening</b>
230:7	123:23	148:24	132:22	233:24
<b>learned</b> 8:22	126:12	149:2	144:16	297:3
44:9,19	127:19	150:1,11	<b>Lightfoot</b>	<b>little</b> 6:22
46:8,12	128:3	151:4,17	193:6,15	8:19 23:3
53:6 64:9	130:11	151:20	194:6,19	37:16
70:24	141:9	152:7,10	<b>LILY</b> 2:17	71:17 83:5
77:16	142:19	152:17	<b>limited</b> 73:9	92:7 97:22
79:20,22	199:13	153:7,25	<b>limiting</b>	107:17
81:13,13	202:25	154:11	14:16	118:2
83:10,22	233:14,22	155:3,21	<b>line</b> 17:13	122:6
91:10 92:9	233:24	156:4,13	33:12	137:24
97:18	234:3,8,13	156:13,16	37:16	148:3
99:12,20	234:20,21	156:18	153:25	158:1
99:21	241:24,25	157:8	155:14	179:19
107:15,18	242:5	158:2,4,14	195:6	193:3
143:15	<b>legally</b>	158:18	197:14	198:16
173:21	125:6	159:12,19	200:8,24	234:20
175:15	158:25	159:25	204:19,23	237:19
190:13	176:18	160:22	205:13	238:8
209:16	179:17	161:4,12	206:5	<b>LiveNote</b>
220:6	196:3	161:17	207:22	1:19 316:7
232:25	198:4,18	162:1,5,16	213:7,8	<b>living</b>
270:10	199:24	163:3,17	220:15	265:25
282:3	201:23	166:17	221:13	266:1
306:21,25	202:22	167:14	222:1,15	<b>LLP</b> 2:3
<b>learning</b>	234:4	224:13,14	223:24	<b>locate</b> 7:21
46:20	<b>legislator</b>	224:19	231:7,22	<b>logistic...</b>
52:16	87:3	226:5	233:12	87:25
77:20	<b>lengthy</b>	294:15	234:21	<b>long</b> 19:25
102:18	108:23	299:5	235:11	20:4 31:10
190:9	303:24	<b>letting</b>	236:20	145:15
<b>leave</b> 148:4	<b>lenses</b>	213:9	238:7	160:1
272:21,23	164:17,21	278:13	241:8,22	177:22
<b>leaving</b>	<b>let's</b> 7:9	<b>level</b> 67:12	242:14,21	182:8
292:23	10:19	91:1 96:24	257:14	237:7
293:23	34:18 42:9	<b>LGBTQ</b> 281:18	258:13	265:20
<b>led</b> 36:8	55:22	<b>liability</b>	260:15	294:16
93:13	63:14	169:16	261:14	303:23
119:24	78:18 97:4	234:14	293:21	304:14
196:8	150:22	<b>liable</b>	295:2	315:9,9
203:5	185:7,9	234:17	<b>lines</b> 105:19	<b>longer</b> 148:3
217:21	243:16	<b>lie</b> 253:1,8	226:8	<b>look</b> 10:4
268:13	258:12	268:8,9	260:24	12:23
304:10,17	294:24	272:24	<b>link</b> 95:12	16:25 17:1
<b>left</b> 94:19	<b>Letitia</b>	282:14,14	<b>listen</b> 6:10	34:11,24
139:18	197:6	282:19,21	101:13,19	37:20

64:24	256:4	174:25	<b>managerial</b>	<b>marked</b> 30:10
109:24	304:23	175:3,10	63:22	42:25 54:1
128:3	307:13	176:11	81:20	57:15
136:19	312:8	177:6	246:10	61:25
150:22	<b>looks</b> 112:16	178:1,11	303:20	82:25
152:6,24	112:19,21	<b>Main</b> 19:5	305:5	109:19
154:10	<b>Loretta</b>	<b>maintained</b>	306:25	131:21
156:18	181:14	120:8	307:10	150:23
157:19	188:1	<b>major</b> 27:20	310:2	153:20
159:18	191:21	27:24	311:19,23	186:22,25
164:13	192:5	66:21	312:13,20	188:5
191:18	296:4	67:12	<b>manner</b> 45:11	189:17
206:11	310:14	84:12,21	45:17	195:1
227:13	<b>losing</b> 192:1	85:8,16	<b>March</b> 1:5	220:10
259:3	234:22	86:4,7	7:18 8:1	236:25
293:18	<b>lost</b> 9:5,7	204:25	16:21	237:6
299:1	10:11	206:25	18:10	244:18
304:13	21:25	209:15,16	28:24	257:13
307:12	157:15	271:13	33:23 35:9	293:18
311:11	232:20	302:16	35:23	298:3
312:23	<b>lot</b> 17:10	306:9,12	37:25 39:8	299:23
<b>looked</b> 9:18	65:17	<b>making</b> 19:15	42:22 43:8	307:14
9:21 17:12	85:12	50:23 51:2	47:10,25	308:19
32:16,25	91:17	52:1 59:2	48:8 50:18	<b>Mary</b> 313:19
33:7,7	247:5	89:11	52:25 57:1	314:1,14
101:22	251:25	134:13	57:9,10,12	314:17
153:3	256:10	181:1	114:15,20	<b>material</b>
182:1,8	300:4	196:11	115:2,10	90:4
214:9	307:15	197:22	115:17,24	179:10,22
244:22	<b>love</b> 273:4	199:25	123:8	188:12
269:22	291:18	201:25	159:13	203:20
270:22,24	<b>LOVELY</b> 1:15	202:14,22	161:1,10	249:22
270:25	5:1 316:10	207:19	161:19,25	<b>matter</b> 5:14
271:1,2,3	<b>Lupien</b> 98:12	213:18	163:14	18:11,22
272:14	313:1,4,20	218:17	193:18,23	19:19
291:5	314:1,14	223:9	194:7	20:10 29:1
298:23	314:17	225:17	217:4	30:24
311:19	<b>LW273-R2</b>	226:7	231:18	35:18
<b>looking</b> 17:9	189:20	250:21	232:1,11	42:13,22
17:9 39:18	<b>LW274-R2</b>	<b>Male</b> 206:5	240:13	47:18 67:4
87:11 93:3	193:3	<b>Malik</b> 281:22	253:9,19	67:18,22
112:13,22	<b>lwesterg...</b>	<b>man</b> 156:21	254:17	68:7,17,24
120:13	2:17	193:11	255:10,13	69:3,8,12
154:21	<hr/> <b>M</b> <hr/>	228:14	257:16	71:10 77:7
158:10	<b>MAAZEL</b> 2:3	276:8	285:5	77:14
159:11	<b>machines</b>	<b>management</b>	286:5,19	80:11
167:2	15:23	17:11 19:9	290:15	85:17 87:7
190:7	<b>mailed</b>	19:12 59:9	<b>marched</b>	89:14
214:14	174:19,21	59:22	228:22	107:10
233:12		193:25	<b>mark</b> 187:11	109:12,16

125:5	<b>mayor</b> 1:15	151:15	303:19,21	40:21
128:10,21	3:3,14 5:1	152:23	303:25	47:17 58:9
130:3	5:9 7:5	153:9,14	304:4	65:4 67:10
132:12	15:24	154:5	305:7	72:8 75:11
134:19	25:12 30:4	158:8	308:16,23	89:5,18,22
135:16,25	31:19 43:3	162:12	310:2	102:17
137:14	43:10 45:4	163:10	311:15,22	104:11
139:18	45:18	164:3	312:9,21	110:20
150:14	51:12	166:16	315:2	119:18
156:6,21	52:19	171:7,11	316:10	124:13
159:15	55:19 56:2	176:8	<b>mayor's</b> 52:8	147:8
163:18	57:15	177:4	52:10	148:15
166:6,10	59:24	178:7,14	63:22	150:6
181:15	60:12	187:2	91:16	157:13
185:15	61:25	188:19	106:8,13	172:14
192:20	63:17,18	198:23	134:25	176:6,15
194:23	63:19	201:20	228:10	186:5,6
196:10,13	67:24	204:15	246:10	206:15
198:6	73:18,18	206:2	259:12,14	222:22
201:25	79:10 81:5	209:18	269:17	229:12
202:15,23	81:13,19	213:5	273:11	233:21
203:21	82:2,16	214:23	290:4	241:12
205:22	83:2 85:2	217:13	301:11	253:17
207:3	86:2 88:20	218:13	302:1	257:25
209:1,20	92:18 96:3	219:10	<b>mayoralty</b>	263:2
211:3,3,8	98:21	220:11	40:19	270:25
212:7	102:18	226:13,16	<b>Mayra</b> 256:23	283:10
214:1	106:25	227:23	<b>McAvoy</b>	289:13
216:17	108:18	228:21,21	221:10	290:8
217:1,16	109:8	228:25	<b>MCU</b> 84:17	294:8,9
219:14	111:18	237:12	<b>ME's</b> 43:13	297:21
222:12	116:14	242:13	44:25	302:4
225:3	117:1,7,20	246:1	77:21	309:10
243:21	118:16	248:4	81:24	314:10
250:22	119:16	249:11	107:13	<b>meaning</b>
253:3	121:2,16	252:20	182:17	73:25
277:4	125:12	256:10	208:13,17	175:23
288:4	126:6	257:9,15	242:18	219:5
295:6,15	132:3,8	258:13	260:1	233:25
295:19	133:10,19	261:15,18	270:17	258:6
296:6,8	135:8	261:18	271:5	284:2
307:18	136:10	271:4	278:14,15	<b>means</b> 8:15
309:17	143:16	272:18,19	302:10,14	49:9 72:11
<b>matters</b>	145:15	281:7	302:17	119:19
19:21 51:3	146:12,18	282:1,5,10	304:20,21	<b>meant</b> 13:17
51:22,23	146:24	288:16	304:25	46:14
53:15	147:12	290:15,21	305:1,22	83:14
65:11	148:10,24	292:24	<b>mean</b> 13:19	213:14
148:6	149:3,25	293:16	28:11	<b>meaty</b> 108:17
202:7	150:11	301:13	29:11 38:9	<b>mechanism</b>

52:15	264:15,19	98:11,12	24:8,19	270:9,15
60:23	264:25	100:21,23	27:19 30:1	270:15,17
<b>media</b> 65:18	265:2	101:12,22	144:18	270:23
65:25 66:2	<b>meeting</b> 10:7	102:2	216:5	271:4
82:16	17:19 19:8	184:10,18	279:21	277:25
84:24	19:17 33:4	193:5	285:18	278:1,3
175:19	33:6 77:19	299:4,5	286:3,17	290:3
178:15,25	79:6,17	<b>members</b>	302:12	298:24
181:11	82:5	33:24 50:9	<b>mentioned</b>	299:4
189:21	105:21,24	51:14	20:18,19	302:6,7,13
190:10	109:15	52:17	24:14	304:19
203:20	117:19	86:14 88:7	32:12 56:2	311:2
237:4,4	132:4	91:23	126:16	<b>messages</b>
245:9	136:1	96:13	249:19	4:10 43:2
292:16	137:16	97:11,16	275:16	189:18
307:17,23	139:17	97:23	277:6	251:13
307:24	146:13,15	98:23 99:9	282:12	254:21
<b>medical</b>	146:21	106:14	287:18	298:8
10:25	147:1,24	107:23	<b>mentioning</b>	302:7
21:23	148:17	169:24	207:10	309:1
36:17 45:1	154:4	171:13	<b>mentor</b>	311:13,16
45:6,10,16	160:3	172:4,11	234:22	312:8
45:22 46:4	165:21	173:2,7	<b>message</b> 8:15	<b>met</b> 5:9
46:9,18,21	194:13	281:18,20	43:17	87:12
58:3 59:13	225:2	281:21	44:25	93:15
62:22	226:12,15	293:12	45:10,15	147:24
64:11	226:24	295:4,8,14	47:9,10,13	265:4
70:11,22	227:18,20	<b>memo</b> 49:8	47:19,23	275:7
71:9,22	230:10	<b>mental</b> 7:13	47:25 48:8	286:15
72:19	264:6	9:2 11:20	48:24	<b>method</b> 61:14
76:13,15	265:20	11:21 12:2	49:15,20	99:21
77:24	267:4,12	12:4,10,13	49:21 50:2	<b>methodology</b>
78:11,14	278:1	13:23 32:6	52:22 54:7	171:2
78:15,17	281:11	35:25	54:9 61:3	<b>MHA</b> 305:7
78:23 79:4	283:16	37:14	83:10	<b>mid</b> 86:21
110:9	284:23	39:24,25	187:19	<b>middle</b> 8:2
119:2,8,10	285:12	56:8,25	188:5	10:1 19:22
119:12,17	286:25	57:6,8,13	189:21	70:2
119:19,21	289:6,22	63:7 79:14	190:14,16	187:25
120:12	291:20,21	80:22 84:6	190:18,21	191:22
261:24	<b>meetings</b>	104:3,8	190:23	296:5
277:15	10:2,2,3,5	127:20	191:4,5	<b>midst</b> 12:2
278:11,21	17:11	156:6,20	192:9	<b>mind</b> 12:8
279:1	19:11,12	173:23	193:4	28:5 35:9
287:2,13	33:9 50:15	240:19,24	194:20,20	38:15 42:5
287:18,25	58:11 94:8	241:2	251:21	42:6 57:10
288:1	109:15	252:2	252:6	60:8
305:16,21	194:1,15	<b>mentally</b>	254:24	112:12
306:6	<b>member</b> 26:9	13:22	259:24	113:11
<b>meet</b> 264:11	86:22	<b>mention</b> 16:8	268:13	176:1

185:7	207:17	<b>murdered</b>	111:5	284:12
214:17	215:6	19:4	153:9	285:14
233:14,22	270:24	<b>murders</b>	188:19	312:4
234:13	271:2,3	225:19	212:19	<b>neverthe...</b>
241:24	295:3		242:24	137:18
259:14	307:13	<b>N</b>	244:2	<b>New</b> 1:20 2:5
275:6,12	<b>Monday</b> 1:16	<b>N</b> 2:1 3:1	252:14	2:5,14,14
<b>minds</b> 306:16	42:16	4:1	263:23,25	5:5,12 6:2
<b>mindset</b>	43:11 68:7	<b>naked</b> 11:8,8	269:9	132:5
233:15,16	<b>money</b> 140:10	22:6	272:17	133:6,14
<b>mine</b> 289:25	<b>Monroe</b> 27:8	191:22	273:14	138:8
<b>minute</b> 42:20	34:1	<b>name</b> 40:25	290:16,22	193:10
116:20	214:12	41:12	292:23	203:10
117:17	<b>month</b> 19:10	110:20	311:11	316:2,4,8
193:15	<b>monthly</b>	112:12	<b>needed</b> 36:9	<b>news</b> 3:20,22
<b>minutes</b> 20:3	58:12	114:11	36:25	187:10
20:3,7	<b>months</b> 215:8	128:23	40:15	188:23
55:22 69:9	216:16,25	129:1	88:17 99:6	191:11
182:11	<b>Moore</b> 229:23	<b>names</b> 266:22	110:17	193:9
185:8	<b>morning</b> 5:9	281:16,18	132:11	220:12
256:13	7:25 8:3	<b>narrow</b> 71:17	258:10	245:5,8,17
308:5	13:20 20:5	286:14	259:21	251:18
<b>mischara...</b>	28:19 43:9	<b>narrowly</b>	264:5,13	256:20
259:16	43:10	107:17	267:6	<b>newscast</b>
<b>misled</b>	187:16	<b>nature</b> 105:6	304:5	3:24
257:15	190:11	110:24	<b>needing</b> 55:3	293:19
<b>misrepre...</b>	191:14	164:7	<b>needs</b> 55:1	<b>night</b> 8:2
259:17	204:24	165:5,8	224:4	11:9 19:2
<b>missed</b> 115:1	205:13	171:23	248:4	22:6,7,11
237:25	251:15	172:2	249:11	43:12
<b>missing</b> 6:5	252:9	203:11	256:7	157:23
<b>misspoken</b>	<b>morning's</b>	253:21	<b>neither</b>	158:4
85:7	56:3	267:22	147:16	244:11
<b>misstated</b>	<b>MORRISON</b>	275:20	316:15	260:7
288:17	2:12	<b>near</b> 68:16	<b>never</b> 6:4	315:7
<b>mistake</b>	<b>mother</b>	159:14,19	89:10,15	<b>Nobody's</b>
112:20	233:17	159:20	99:2,2	270:5
307:11	<b>motivation</b>	277:8	101:11	<b>noise</b> 59:2
<b>misunder...</b>	138:13	<b>nearly</b> 11:8	102:23	219:9
245:22	<b>move</b> 77:4	<b>necessarily</b>	135:15	<b>norm</b> 40:5,15
<b>misunder...</b>	200:16,18	41:8 72:8	147:14	41:6 44:24
133:4	252:15	97:2 207:5	232:4	258:9
202:19	273:5	214:19	243:19	<b>normal</b> 23:3
218:7	280:25	221:8	254:22,22	26:7,20
<b>Mitch</b> 281:22	281:2	233:16	268:9	40:17
299:5,6	<b>moving</b> 197:2	<b>necessary</b>	270:13	59:15 65:5
<b>mom</b> 54:14	231:6	166:17	271:12	65:20
<b>moment</b> 14:16	234:19	<b>neck</b> 254:4	277:21	101:10
64:9 152:4	235:11	<b>need</b> 6:21,21	280:6	211:22,23
201:13	<b>murder</b> 49:23	41:14	282:21	239:12

289:2	49:21	212:23	51:4 56:11	95:18,19
<b>normally</b>	51:20	247:1	59:14,25	95:21,25
171:5	56:25 59:6	303:20	62:10	96:20
<b>north</b> 235:1	59:7,19	<b>numbers</b>	73:11,21	112:4
<b>Nos</b> 4:7	98:18,24	30:18 58:7	74:22	117:6
<b>Notary</b> 1:20	99:5,12	58:12,13	96:24	120:13
5:5 316:7	155:9	58:14,17	117:5,10	121:23
<b>note</b> 45:21	174:8	58:18	117:19	122:13,25
83:25	175:12	61:22 70:4	121:4	123:12
132:24	179:16	70:6 72:24	131:18	124:2,8,10
164:5	190:17	73:5 74:13	136:11	124:16,18
<b>noted</b> 132:3	278:20	76:5	139:4	125:4,9,16
<b>notes</b> 131:22	305:21,22		168:25	125:19
134:16,22	<b>notify</b> 50:2	<b>O</b>	170:7	126:23
135:13	60:16,21	<b>oath</b> 274:6	181:20	127:6,21
215:19	61:1 107:9	<b>object</b>	207:11	128:5,15
316:13	107:21	135:12	224:3	129:2,4,10
<b>notice</b> 89:7	108:5	248:24	226:3	129:14,22
107:1,19	136:12	<b>objection</b>	231:3	130:8,9,17
108:7	137:18	219:12	235:20	130:22,25
140:1,7,15	141:8	<b>obligation</b>	262:15	131:5,15
154:14	168:6,21	141:14	266:17	132:6,17
182:7	169:2,23	<b>obligations</b>	277:8	133:7,14
183:12	172:1	140:23	280:2,4,4	134:9
204:19	179:8,9	141:1	293:25	136:3,17
210:4,21	199:15	<b>observe</b> 68:3	294:11	137:1,5,11
215:15	207:6	<b>observed</b>	<b>OD'd</b> 260:17	138:7,7
247:6	291:10	114:18	<b>odd</b> 208:18	140:20
252:22,25	<b>notifying</b>	<b>obviously</b>	<b>offer</b> 49:25	142:12,16
281:11,14	40:8 44:10	6:19 38:1	138:5	142:25
285:24	44:17,18	186:6	143:13	143:6,12
288:16	137:20	207:25	211:19	143:14,24
<b>notifica...</b>	198:19	274:25	<b>office</b> 20:17	144:4,7,7
39:23	<b>November</b>	<b>occasion</b>	20:19,21	144:11
49:17	31:4	56:19	27:9,14	145:6,9,12
59:11	132:14	150:3	30:5,12	159:14
60:15	<b>number</b> 10:1	171:20	31:2 34:1	160:2,5,17
82:12	12:16,21	252:12	34:2,10,21	166:21
134:4,14	17:4,6	281:4	34:21	168:11
134:18	33:2,11	287:17	43:13 45:1	176:19
135:25	34:10	<b>occasions</b>	45:2,6,10	179:9,12
169:11,18	36:20	45:7	49:9 51:21	179:16,21
170:9	40:23 41:9	171:12	52:6,8,10	180:11,22
177:5	58:15	275:17	54:14,20	180:22
196:12	72:18 73:9	298:18	66:14	181:2
197:22	89:19	<b>occur</b> 129:8	77:13	182:17
198:14	140:14,14	142:6	81:25 82:9	183:5,9
201:25	190:3,3,4	<b>occurred</b>	86:1,8	184:5
202:15,23	190:5,23	37:23 42:4	88:2,3	196:3,9,24
<b>notified</b>	212:19,20	44:5,11	94:11 95:9	196:25

197:5,19	25:15	125:7	10:17 11:3	76:3,7,10
197:24	65:16 66:8	127:15	11:7,11,16	77:9 79:9
198:9,12	93:21,24	164:9	11:23	79:19 80:1
198:13	112:18,22	170:10,16	12:14 13:5	80:25
199:1,11	112:22,23	193:10	13:9 14:4	81:15
199:18,19	118:10,11	209:5	14:7,20	83:19 84:3
199:23	120:2	219:13	15:6,8	85:15
200:2,13	156:9	220:23,25	16:4,8	86:11
201:2	164:10	221:8,14	18:5,17	88:19
202:3,4,6	183:2	222:1,18	19:25 20:4	90:11,23
203:8,9,12	191:25	222:24	20:8,25	95:10 96:1
203:17	217:20	223:10,18	22:1,5,17	96:10
205:16,22	226:22	225:17	23:17,25	100:8,10
207:4	284:24	230:22	25:12,18	100:11,25
208:13,17	<b>officer's</b>	232:4	26:15,24	100:25
209:4	112:12	233:8	27:17,22	102:9
214:7,12	<b>officers</b>	234:4	28:23 29:3	103:22
214:17,18	10:12,14	238:13,22	29:11,18	106:25
214:25	12:15,16	239:8,15	31:16 32:7	107:7
215:12	14:8,12,17	239:21	32:11	108:3,24
216:9,10	19:15	254:23	33:22,22	113:10
216:11	20:12,23	255:1	36:19	114:7
217:14	21:7 22:11	267:19,24	37:20,21	115:24
218:2,14	22:15,18	276:9	37:25	116:9
219:2,11	23:7,13,15	285:19	39:21 40:6	117:3
220:7	23:18 24:1	286:18	40:18	118:14,22
234:7	24:20 25:3	291:9	41:21 42:9	119:7
235:8,23	25:15,24	306:11	43:5 45:20	120:20,25
236:1	26:2,20	<b>officers'</b>	46:6,17,23	123:21
238:15,16	28:5,14	24:24 85:1	47:8,12	124:3
241:18,19	29:6 34:6	85:23	48:5,11,16	138:17
242:7,8,11	35:18,24	119:24	48:25 49:5	139:21
243:18	36:15	233:1	49:13	142:3
244:9	37:12,15	254:16	51:11	143:3,17
245:12,22	38:8,12	286:4	52:25	145:22
246:8,13	39:16 41:4	288:11,18	53:25	146:3,9,20
246:15,21	41:22	<b>offices</b> 35:3	54:22	147:7,23
247:7	54:15 55:9	<b>official</b>	57:14 59:3	148:23
250:17	55:15	5:11	59:11,23	149:15
259:18	84:13,20	<b>Oh</b> 69:18	61:11 62:6	150:9
264:20	86:5 93:4	205:25	62:11,12	151:7
305:7,21	100:19	272:16	62:17 63:4	152:20
305:22	112:14	291:5	64:6,24	153:2
314:7	113:5	304:12	67:15,24	154:10,21
<b>office's</b>	121:10,20	311:25	68:5,21	155:8
123:23	121:21	<b>okay</b> 5:24	69:1,7,18	156:3
307:12	122:8,21	6:5,12,17	70:14 72:7	159:10,24
<b>officer</b>	122:25	6:18,24,25	72:15 73:1	160:12,15
14:17	123:5,8,13	7:3,4,9	73:23	160:21
23:22 25:3	123:17,25	8:4,7,18	74:21 75:5	162:4



165:1,16	252:5,7	103:16	91:24	<b>organiza...</b>
167:1	253:21	<b>ones</b> 75:22	92:10	93:13
168:1,2,12	255:8,15	86:9 309:1	159:4	<b>organized</b>
168:18	260:2	<b>ongoing</b>	171:14	245:8
170:20	261:13	106:18	188:12	<b>orient</b> 237:8
172:17	262:9	130:7	233:22	<b>original</b>
173:4,10	263:12	208:1	<b>opposite</b>	236:7
173:14,20	264:15,17	209:9,12	66:22 67:1	<b>originally</b>
174:10,17	264:19	<b>open</b> 8:12	<b>oral</b> 49:16	9:18 32:16
174:18	265:3,11	75:6,14	<b>orally</b> 49:15	74:12
175:6,9,15	265:17,20	94:3 116:6	60:17	<b>outcome</b>
177:25	265:23	116:6	287:25	278:10,21
178:13	266:7,13	153:4,4	<b>orbital</b>	316:17
179:8	266:20	187:1	276:10	<b>outlined</b>
180:13,20	267:7	209:14	<b>order</b> 78:21	195:10
181:7,24	274:8	266:3,5	78:23	199:19
182:4,7,12	275:16	<b>operations</b>	97:12	216:9
183:10,20	276:1	56:15	123:23	<b>outlines</b>
184:6,15	277:19	65:20	124:15,22	196:23
184:18,22	279:23	<b>OPI</b> 4:8	124:24	203:13
185:23	280:20	31:11 32:3	125:6	<b>outrage</b>
188:9	282:3,8,12	32:9 66:18	129:20	154:20
189:12,16	287:24	131:22	136:19,20	<b>outraged</b>
193:1	289:21	132:1,14	136:23	154:7,13
194:22	290:24	132:16	137:9	<b>outside</b>
196:5	294:24	133:5	195:11,13	19:10
197:3	296:4	134:2	195:14,19	37:18
201:10,22	298:13,17	135:4,15	195:23	52:11
202:18	299:21,22	135:23	196:6,10	59:15
203:4	301:12	<b>OPI's</b> 30:23	196:23	65:20
204:6,9	307:3,7	132:25	197:21	96:19
207:16,21	308:4,8,9	134:22	198:4,8,10	101:10
208:9	308:18	135:13	198:17,25	123:1
210:5	309:15	<b>opinion</b>	199:4,13	239:25
213:23	311:6	105:9	199:18	276:16
215:21	312:18	138:5	201:15,23	<b>outside-...</b>
216:14	315:1	208:10	202:2,12	26:3
219:16	<b>omit</b> 286:25	223:6	202:13,21	<b>outstanding</b>
220:5,9	287:11	269:12	203:2,5,7	130:4
223:8,11	<b>once</b> 19:10	<b>opportun...</b>	203:13	<b>overall</b>
223:24	107:15	5:25	204:7	71:11
226:6	136:25,25	<b>opportunity</b>	215:2,11	<b>overdose</b>
228:5	152:4	45:5	216:5,8	10:16
229:16,19	203:19	143:13	296:8	20:15
229:21	210:21	<b>opposed</b>	311:3	36:11 42:7
230:12	298:18,19	10:24	<b>ordered</b>	44:15,23
232:13	<b>one-on-one</b>	29:22,23	204:24	46:4,25
236:16	192:23	35:11	205:6,14	57:11,12
237:5,24	225:2,8	50:10	<b>ordinary</b>	57:13
244:10	<b>one-to-one</b>	61:14 72:4	65:2	76:12

106:21,22	221:13,25	52:8,10	98:17,19	315:3,10
111:24,25	222:7,15	53:14	99:23	<b>Patrick</b> 62:5
117:24	223:24	59:24 62:8	100:8	279:21
118:8	231:7	71:11	101:18	<b>Patterson</b>
231:9,17	233:12	77:25 79:5	141:7	98:11
232:3	234:19	79:10 81:8	196:10,21	<b>Paul</b> 313:1
240:17,25	235:11	91:13	197:14	<b>paused</b>
254:20	238:6	93:15	200:8	112:11
258:7	241:8	107:23	202:5	<b>paying</b> 58:16
268:12	242:14,19	108:15	203:11	<b>PCP</b> 9:1,7,24
274:20	242:21	112:9,11	214:5	10:10
296:24	257:14	112:17	249:19	11:20
301:19	258:12	115:11	251:5	12:10,13
<b>overdosed</b>	260:15	119:10,25	<b>partly</b>	20:14
36:11	261:13	120:14	158:23	31:22
240:4,8	293:21	132:1	<b>parts</b> 10:21	32:19
<b>overdoses</b>	295:2	153:6	215:25	36:12 42:7
42:8	300:10,24	167:3	233:23	42:17
<b>overheard</b>	304:21	169:5	<b>party</b> 313:15	43:11
266:17	305:4	176:16	316:16	76:20,24
	312:13	183:15	<b>pass</b> 10:15	78:22
<b>P</b>	<b>pages</b> 151:7	199:2	40:2 87:14	106:22,22
<b>P</b> 2:1,1 3:1	201:18	202:13	219:17	111:24,25
4:1	237:18,19	204:12	<b>passage</b>	117:24
<b>p.m</b> 62:11	259:25	209:13	197:21	118:8
63:1 146:1	303:23	211:6	214:21	119:14
237:10	307:14,25	215:20	215:15	155:10
243:24	<b>paid</b> 212:17	218:23	216:6	156:7,22
244:20	<b>Pam</b> 47:4	225:5	224:16	182:19
252:6	135:8	226:3	242:3	188:2
256:18	256:12	247:12	<b>passed</b> 27:4	191:22
296:15,15	<b>Pamela</b> 1:17	248:22	27:11	193:18,24
308:12,21	5:3 316:5	266:21	42:17 46:7	232:19
315:12	316:24	274:13,14	57:24	240:7
<b>page</b> 3:6,8	<b>pandemic</b>	276:3,24	61:20	241:1
4:2 30:13	70:2	291:2	106:22	254:20,24
30:18	<b>paperwork</b>	296:5	<b>passing</b>	258:7
131:24	272:14	307:10,12	57:21	268:12,14
189:20	<b>paragraph</b>	<b>particip...</b>	287:19,20	271:5
193:3,16	31:19	17:20	287:23	274:20
195:6	54:24	<b>participate</b>	288:2	278:4,6
196:19	154:20	212:9	<b>pat</b> 26:10	296:23
200:7	156:19	221:8	<b>Pate</b> 37:11	301:18
204:20	160:23	<b>particip...</b>	38:3,10,19	<b>PD</b> 65:7 66:8
205:12	163:3,9	139:25	39:4,11	66:15
206:5	164:4,14	220:13	127:15	91:11,22
207:22	<b>part</b> 18:10	<b>particular</b>	183:24	98:25
213:6	30:23	39:3 40:16	<b>Pate's</b> 39:13	<b>PDF</b> 153:10
214:22	46:15	49:6 74:5	<b>patience</b>	<b>pedantic</b>
220:14	51:15 52:7	80:11 96:4	293:16	29:11

<b>pending</b> 114:1	204:2	219:1, 4, 6	24:20	191:10
<b>people</b> 17:22 37:18, 19 51:7, 14 87:6 89:20 93:18 95:20 117:19 157:14 164:18, 22 172:20 178:16, 18 186:6 194:1 199:15 215:4 244:3 249:7, 13 252:2 266:17, 22 268:8 272:17 280:8 282:17, 18 282:25 284:2, 4 295:20 301:13, 14 314:15	<b>permitted</b> 96:3 122:9 296:9 <b>permitting</b> 204:7, 8 <b>perplexed</b> 271:10 <b>person</b> 10:3 19:3 26:10 39:24 40:2 41:23 46:15 57:9 57:24 58:3 61:20 65:14, 21 72:11, 12 72:25 73:20 74:9 76:25 115:12, 17 128:20, 22 129:4 141:9 180:22 187:10 188:23 247:18 257:4 258:24 259:2 260:17 261:11 264:25 265:2 292:1	<b>personnel</b> 88:22 <b>perspective</b> 177:18, 18 <b>pertained</b> 136:4 <b>pertains</b> 290:1 <b>phone</b> 8:14 8:17, 22 9:19, 21 10:5 16:21 16:25 17:2 17:3, 7, 9 20:2 24:21 31:20 32:12, 14 32:15, 20 32:25 33:8 43:3 48:22 49:8, 15 50:2, 13 59:8, 19 61:2 77:6 77:9 87:2 129:9 147:15 148:11 151:5 153:11 159:9 174:12 181:22, 23 182:2, 8 186:2 188:7 190:5, 19 190:21, 24 255:20 265:1 299:1	25:14, 23 26:3, 8 78:1 232:10, 15 239:21 286:4, 18 <b>physically</b> 285:20 <b>pick</b> 94:19 129:9 <b>picking</b> 200:7 205:12 <b>picks</b> 197:13 <b>picture</b> 164:7 165:5, 7, 18 <b>piece</b> 115:1 <b>PIO</b> 65:14 66:19 <b>place</b> 15:24 17:14 30:22 33:13 58:22 60:9 106:9 147:2 159:13 161:10 188:7 226:12 299:22 316:11 <b>placed</b> 13:7 13:10 24:5 24:8 120:17 267:24 <b>places</b> 250:8 251:2, 5 <b>placing</b> 64:1 <b>plan</b> 54:16 <b>plank</b> 112:8 120:2, 5 233:10 254:5 268:1 <b>planning</b> 177:9, 16	262:14 292:6 <b>play</b> 169:1, 7 169:17 170:8 314:1 <b>played</b> 145:8 242:5 <b>please</b> 6:15 30:14 135:6 247:12 298:10, 11 <b>plow</b> 108:21 <b>plug</b> 256:14 <b>plural</b> 23:19 <b>point</b> 18:15 26:7 27:13 28:20, 24 29:22 33:18 34:20 37:4 38:24 39:4 43:14, 20 44:3 46:8 47:13, 25 65:1 66:8 68:18 75:6 76:18 81:3 106:6 108:12 112:12 121:1 122:21 125:10 142:8 145:2 161:13 162:4 169:25 173:21 177:11 182:5 192:24 195:7 197:9 200:19, 25 202:12 203:4
<b>people's</b> 252:2	<b>person's</b> 128:23 129:1 254:4	<b>phones</b> 274:11 276:2, 22 <b>phrase</b> 13:19 78:6 166:2 183:1		
<b>percent</b> 79:2	<b>personal</b> 188:7 274:11 276:2, 21 276:21	<b>physical</b>		
<b>perception</b> 44:5	<b>personality</b> 233:23			
<b>period</b> 63:5 84:9, 11 86:11 90:15 103:3, 9 116:12, 18 147:25 167:20, 23 168:3 169:21 178:6, 10 178:17	<b>personally</b> 67:6, 17 145:20			
<b>periods</b> 310:6				
<b>permission</b>				

205:23	102:20	281:5	131:15	116:22
208:14	103:5	313:19	137:22	121:13
209:11	106:9,15	<b>portion</b> 47:5	148:18	154:13
213:25	106:24	135:10	196:11	226:17
222:9,18	110:25	247:13	197:15,21	265:3,8
223:13	111:3	<b>position</b>	197:25	266:8
228:5,9	115:18	15:3 228:2	198:4	<b>presented</b>
232:14	120:21	228:4	199:24	212:6
243:5,12	160:25	245:1	200:10	242:16
255:4	161:18,24	247:23	201:7,24	<b>preserva...</b>
257:3,4	162:8,10	261:23	202:22	79:20,23
273:10	169:24	262:3	203:18	80:4,8
281:7	170:15	<b>positions</b>	207:10	81:4 83:11
292:14	191:23	293:23	242:9	83:22
294:12	193:10	<b>possibility</b>	<b>precludes</b>	<b>preserve</b>
295:7	200:15	123:16	129:15,16	79:12
<b>pointed</b>	214:23	266:14	200:20	80:10,21
251:5,10	223:25	<b>possible</b>	201:1,24	<b>president</b>
<b>pointer</b>	224:10	29:13 40:1	202:14	132:12
31:18	225:25	72:3 92:25	206:10	171:1,4,9
131:25	229:17	153:4	<b>precursor</b>	171:15,16
162:7	231:9,19	186:13	79:24	171:21
<b>pointing</b>	231:25	195:8	<b>predicated</b>	172:1,8,16
162:6	279:10	208:3	131:13	172:19,24
<b>points</b> 58:2	285:19	209:10	<b>predicted</b>	173:4,9
<b>police</b> 7:17	286:3,18	212:6	43:25	181:14
7:18,23	294:20	225:5	<b>preference</b>	182:9
8:6,13	305:6	240:17	49:1	183:17
10:24 13:3	312:2	<b>possibly</b>	<b>preliminary</b>	184:11
13:7,13,21	<b>police's</b>	308:2	305:1	185:14,17
19:13,15	65:14	<b>potential</b>	<b>premarked</b>	186:16
21:22 22:3	<b>policies</b>	169:15	3:6	187:6,12
22:11,15	20:24	<b>powers</b>	<b>prepare</b>	188:21
23:11 37:6	28:11,15	203:14	177:10	192:18
38:12	34:7,12	<b>PPE</b> 19:16	<b>prepared</b>	193:5,14
48:17	39:20	225:18	90:20	193:17
51:25 57:5	87:11	<b>practice</b>	181:8	194:6,19
65:2,15	93:25 94:2	5:24,25	195:3	273:23
66:4,5	117:14	48:17,20	236:21	295:5,19
67:6 82:2	120:10	60:7 171:7	237:3,4	296:16,20
86:14	123:2	171:7	294:21	299:10
91:24 92:9	<b>policing</b>	207:15	307:16,23	309:17
92:14 93:7	177:19	<b>precisely</b>	310:3	310:22
93:16,24	<b>policy</b> 20:13	118:16	<b>preparing</b>	<b>press</b> 3:17
95:15	23:19 93:9	<b>preclude</b>	88:20	56:18
96:11,19	113:4	198:18	<b>presence</b>	69:13,15
96:20,21	162:8	199:6	22:10	69:24
97:24	182:23	<b>precluded</b>	<b>present</b>	70:21
100:6,24	<b>political</b>	125:6	31:13	71:20
101:20	170:16	129:11	69:16,17	84:23 85:8

85:11,18	227:12	<b>priority</b>	254:3	<b>pronounced</b>
88:7	236:24	88:13,16	<b>procedures</b>	43:12
177:18	237:6	<b>privacy</b>	20:24	<b>proper</b> 19:16
190:19	257:13	266:3	28:11,15	112:25
191:14	287:14	<b>private</b>	34:7,12	113:3,10
194:22	288:3,13	190:5	39:20	123:9,10
195:4,15	296:11	266:21	59:15	208:9
195:20	297:18	<b>privilege</b>	87:11	225:18
196:17	299:23	109:21	93:25 94:2	254:2,2,5
215:23	300:22	<b>privy</b> 310:8	101:11	<b>properly</b>
226:14	<b>primary</b>	<b>proactive</b>	117:14	300:5
230:2,9,11	156:9	305:19	120:10	<b>property</b>
257:1,7	<b>Prince</b> 62:4	<b>probably</b>	<b>proceed</b> 35:8	41:9
258:22	62:15 83:4	5:21 9:8	126:18,21	<b>prosecution</b>
262:11,15	144:4	18:3 47:4	127:2,6	214:15
262:17	245:4	105:1	149:18	<b>prosecut...</b>
263:18	<b>Prince's</b>	108:21	234:6	35:3
271:16	84:1	153:17	<b>proceeding</b>	<b>protect</b> 93:4
287:8	<b>Prince-B...</b>	167:23	219:13	93:4 224:5
313:25	3:23	244:2	<b>process</b> 15:1	<b>protesters</b>
314:12	<b>print</b> 300:2	252:8,11	17:4 20:15	260:4,6,8
<b>presser</b>	300:4	252:16	92:19	292:22
191:7,13	<b>prior</b> 22:3	257:11	101:2	293:3
<b>presume</b>	32:13 39:7	285:16	123:11,11	<b>protests</b>
206:6	45:6 50:17	298:20	209:6	103:20
<b>pretty</b>	52:25 61:8	304:13	210:24	105:2
108:22	63:12	<b>problem</b>	291:16,17	106:5
116:20	71:24 72:3	12:24	291:24	178:23,24
<b>preview</b>	79:3 84:3	99:18	<b>produce</b>	293:9,10
229:25	102:1	100:19	141:15	<b>protocol</b> 6:7
<b>previewed</b>	103:25	101:6,17	<b>produced</b>	123:10
230:8	104:8	105:12	188:11	206:15,18
<b>previous</b>	118:15	113:13	<b>production</b>	206:21,23
58:23	119:1,6	161:21	90:2	207:9
61:17	143:18	173:7,11	<b>Professi...</b>	211:7
<b>previously</b>	150:14	173:12	1:18 5:4	254:2
30:10 42:4	160:17	238:25	16:9 27:1	<b>protocols</b>
54:1 57:16	167:24	274:16	35:19 36:1	101:11
82:25 98:5	174:1	291:5,8,8	95:16	225:13
100:9,10	181:7	303:6	205:2	<b>provide</b>
109:19	210:19	<b>problems</b>	206:25	62:21
131:21	211:4,11	50:22	209:19	89:20
150:22	212:18	53:10,21	316:6	102:20
154:24	213:1	<b>procedural</b>	<b>professi...</b>	122:11
155:16,19	219:2	167:11	224:1,11	141:10,11
165:13	230:5	<b>procedure</b>	<b>proffer</b>	235:15
186:22	232:16	59:12	188:14	<b>provided</b>
189:17	268:19	113:4	<b>program</b>	10:25
195:1	305:24	123:2,10	296:25	21:23
216:1	306:1	182:23	297:16	34:24

202:24	79:11	181:10,14	296:23	44:10
218:1	80:19,23	185:15	300:20	56:11,15
231:11	81:9,18	189:8,21	301:6,7,8	65:7,12,16
257:17	83:12,23	190:10	302:24	66:7,14
<b>providing</b>	84:5,5,14	191:12	303:17	95:6,15
126:12	85:17 86:6	192:20	305:8	105:13
144:25	88:24	193:9	306:7,7	107:10,21
<b>Prude</b> 1:6	89:13 90:5	194:7,23	307:18	108:5
5:14 7:13	90:19 91:2	197:23	309:17	113:18
7:17,24	91:25 92:3	198:5	<b>Prude's</b> 14:2	127:13,20
8:14 10:23	92:5,11	199:15	24:9 45:12	131:13
11:4,8,13	102:4	201:25	45:17	132:10
11:17 12:2	104:2,8,20	202:15,23	46:19,25	134:4,13
12:10,17	104:23	203:21	70:25	134:18
13:7,10,13	105:10	205:22	71:23	135:25
14:9,18	106:2,17	209:1,21	79:14	136:12
15:2 17:18	106:21	209:25	110:9,25	137:13,18
18:11,22	107:1,7,10	210:13,15	112:8	137:20
19:19	107:18,22	211:3,10	120:18	138:4
20:10 21:1	108:5,6,10	211:20	130:20	143:8
21:8,21	109:12,16	212:2,12	136:13	160:17
22:2,6,10	110:3,6,16	212:17	137:19	168:6,21
22:14,19	110:20,23	214:1	168:7	169:2,8,11
23:8,14	111:1	216:17	169:3,12	169:18,23
24:2,5,21	112:6,15	217:1,16	169:19	170:9
24:25 25:4	113:6	219:14	170:22	177:17
25:5,8,15	114:12	220:25	198:20	178:2
25:24	118:12	224:4	207:23	181:8,10
26:20 27:4	119:23	225:3,8	208:7	194:15
29:1,6	127:20	226:3	231:24	196:12
30:2 35:18	130:3,5,18	231:4,19	233:3	197:22
35:25	131:8	232:2,5,11	255:2	198:14,19
36:16 38:7	134:4,18	232:16,18	305:13	199:22,25
40:8 42:12	135:25	234:16	<b>Prudes</b> 313:9	201:25
42:22	137:14	239:16,22	<b>PSS</b> 20:16	202:14,23
43:21 44:5	138:20	240:4,13	27:23,23	203:21
44:9,19	139:4,12	240:16	27:24	204:2,4
46:9 61:8	139:18,25	243:21	54:24 86:9	206:24
62:22 63:8	140:6,10	250:22	94:3 95:4	208:12
64:11	140:12	253:9,19	95:6,16,20	216:21
67:18 68:7	143:11	254:16	205:9	217:1,15
68:17,24	150:3,14	255:11	208:25	218:17,21
69:3,8,12	154:6	260:25	209:3,14	220:7
70:12	167:21	261:25	<b>psychotic</b>	222:10
71:10	168:22	279:15	31:23 32:1	225:24
74:18 75:1	169:16	284:24	32:5,9	228:22
75:7,24	173:22,23	285:20	<b>public</b> 1:20	231:2
76:19,23	174:3,20	286:4,19	5:5 30:5	232:9,14
77:6,14,25	175:1,10	295:15,19	30:12 31:2	239:14,20
78:12 79:4	178:1	295:21	39:23	241:14

243:21	114:17	91:20 92:7	<b>question's</b>	<b>R</b>
246:19,22	115:19	97:20 98:3	198:16	<b>R2:1 316:1</b>
250:22	149:2,25	102:17	<b>questioned</b>	<b>race 229:4</b>
251:24	157:3,8	104:15	283:18	<b>Rachel 313:1</b>
295:25	158:21	107:17	<b>questioning</b>	313:9,18
296:9	191:24	126:8	293:10,11	314:14
316:8	196:6	130:23	<b>questions</b>	<b>racial 227:4</b>
<b>publicly</b>	209:3	132:20	6:9,10	<b>racially</b>
80:12	213:7	135:7,21	9:12 21:16	227:15
105:16	233:9	137:24	30:9 62:7	<b>racism 227:5</b>
135:16	234:13	138:9	62:13 84:8	<b>radar 61:18</b>
177:13	238:1	149:9	114:9	<b>radio 296:25</b>
198:5	239:10	161:11,22	130:1	297:4,15
199:14	244:2,10	163:2	139:23	<b>raise 238:25</b>
206:12	244:19	165:11,24	153:8	<b>raised 38:15</b>
220:3	272:4	174:23	167:23,25	38:18
229:2	280:1	179:19	178:25	228:15
241:13	287:4,21	187:11	183:23	276:1
275:10	288:4,7	188:19	195:2	<b>raises</b>
<b>published</b>	289:19	192:19	204:16	268:11
30:23	297:7	196:14	274:25	<b>ran 9:15</b>
<b>pull 153:10</b>	303:21,21	199:9	293:25	32:17
<b>punched 29:9</b>	308:18	202:11	294:11,22	<b>range 152:6</b>
<b>punching</b>	<b>putting</b>	206:4,6	295:10	152:16
29:5	39:15	208:6,11	307:15	158:11
267:18,19	42:24 64:8	211:1,17	308:14	<b>ranges 151:3</b>
267:21	157:9	213:6	315:4	<b>rank 129:6</b>
285:8,14		215:17	<b>quick 185:1</b>	<b>reach 114:23</b>
286:22	<b>Q</b>	216:4	185:3	169:22
288:23	<b>quarterly</b>	222:2	187:24	<b>reached</b>
<b>punctuation</b>	93:15	223:8	<b>quickly</b>	67:17
310:6	<b>question</b>	229:8	260:23	184:18
<b>purpose</b>	6:15,17	240:10	<b>quit 269:9</b>	<b>react 38:16</b>
54:11	7:1,3	242:15	269:14,15	38:17
267:3	16:15	246:4	273:19	208:5,8
303:13	22:25	248:16	<b>quite 159:14</b>	<b>reaction</b>
<b>purposes</b>	24:17	249:3,4	159:19	39:4 127:4
42:25	25:17 27:6	251:4	160:24	127:9
<b>pursuant</b>	28:12	261:8	<b>quote 31:16</b>	167:8
81:10	35:21 40:6	266:16	132:2	174:15
125:5	42:11	269:11	165:3	207:21
140:23	44:16 46:3	275:2	193:16	241:2
142:10	47:3,21	277:20	220:15	262:22
<b>put 14:2</b>	62:24 67:3	284:11	226:1	<b>read 47:6</b>
15:24	68:13	285:22	235:12	89:9 135:7
24:17	71:17,18	286:14	285:25	135:11
26:11,11	74:7 75:6	295:17	301:2	167:9
26:12,13	75:9,14,21	300:18	<b>quotes 32:2</b>	240:11
26:13 32:1	75:25	311:12	<b>quoting</b>	247:11,14
57:3 82:11	80:15 86:2	312:18	245:1	252:22

286:6	217:8	138:6,16	114:15	297:12
312:24	254:19	140:5	131:14	305:6
<b>reading</b>	275:3	158:12	167:9	<b>record's</b>
232:24	281:13	159:3	177:6	134:21
246:10	289:23	175:8	190:24	255:25
303:11	<b>reasoning</b>	182:3,12	192:5,12	300:3
<b>reads</b> 43:9	122:11	184:6	281:10	<b>recorded</b>
<b>real</b> 6:3	<b>reasons</b>	189:13	304:25	72:19
297:4	126:18	190:9	305:2	<b>records</b> 9:19
<b>realize</b>	228:9	205:8	<b>receiving</b>	9:21 10:5
307:7	249:18	219:8,10	47:10 54:6	16:25 17:2
<b>realized</b>	251:22	221:7	57:17	17:7,12
17:10 33:8	294:7,13	225:14	98:10	20:2 32:14
114:18	<b>recall</b> 11:10	243:17	<b>recess</b> 55:24	32:15 33:1
274:22	11:15 13:8	244:23	145:25	79:13
<b>really</b> 6:4	13:11 14:3	245:3	256:17	80:10,22
16:18	14:14 15:9	252:5	308:11	182:2,8
21:17	17:5,16	255:22	<b>recite</b> 289:7	218:16
29:21 30:1	18:16,17	256:3	<b>recognize</b>	255:20
31:7 34:18	18:21	267:11	273:4	276:12
58:14	19:23 24:3	271:6	<b>recognizing</b>	310:13
62:16	24:10 25:1	277:18	119:11	<b>red</b> 151:20
66:21	25:6,10	286:7,8,21	<b>recollec...</b>	<b>redact</b> 89:20
72:13	27:21,24	289:10	21:19 31:8	89:23
117:12	29:10,13	296:18	32:18	<b>redacted</b>
180:25	30:3 31:1	298:21	41:15 56:8	90:20
182:17	32:24	299:16	93:5 135:1	<b>redaction</b>
184:14	41:12,16	300:6,21	135:3	88:23 90:4
195:6	46:20 47:9	300:23	186:2,9,19	<b>redactions</b>
223:8	51:17	<b>recalled</b>	232:17	89:21
234:19	52:20	29:7 32:24	239:24	<b>refer</b> 236:16
249:2	53:13 54:6	48:3,4	261:5	240:3,23
271:21	57:16	71:3	283:5,22	243:4
273:16	68:21 69:4	<b>recalls</b>	297:16	<b>reference</b>
275:24	69:22	31:19	305:12	3:6 124:21
289:14	71:21 72:4	<b>receive</b>	<b>recommen...</b>	237:13
303:5,6	77:9,12,20	59:20	309:13	298:2
310:6	78:20	60:15 61:2	<b>record</b> 5:10	301:4
311:13	86:18,20	61:3,7	14:23	303:15
315:2	86:25	160:19	21:18 47:5	311:9
<b>Realtime</b>	97:15	167:6	109:6	313:13
1:19	103:4,15	210:21	135:10	314:8
<b>reask</b> 71:18	103:19,20	211:14	145:17,24	<b>referenced</b>
<b>reason</b> 7:5	103:22	<b>received</b>	168:1	3:10,13,21
23:10 26:4	114:23	42:14 45:9	184:25	3:25 4:4,5
46:3,7	118:20,23	47:8 54:9	185:11	4:9,11
83:16	119:8	54:13 63:6	235:3	303:20
94:17 96:5	121:18	83:9,20	247:13	<b>referencing</b>
176:18	122:7	87:2,5	255:18	313:21
201:18	128:25	110:13	266:21	<b>referred</b>



64:17	113:24	93:12	131:23	<b>remember</b>
242:16	128:5	<b>relative</b>	144:21	19:3 29:8
276:7	154:6	146:21	167:21	29:14,16
<b>referring</b>	205:16,22	<b>relative's</b>	173:22	29:19
21:6 37:10	206:1	264:16	174:13	32:17
43:18	208:3	265:4,21	175:5	40:24 45:8
63:23	209:10	267:13	176:1,4	68:25 69:5
149:21	222:11	<b>relatives'</b>	177:13	69:11,12
189:6	<b>regardless</b>	267:4	180:2,9	70:13,15
192:9	113:25	<b>relax</b> 108:20	183:18	70:17,19
193:22	138:3	<b>relayed</b>	190:10	70:23 71:5
206:21	<b>regards</b>	274:9	191:13	71:6,8,10
220:22	125:22	303:4	203:20	84:22
224:9,15	<b>Registered</b>	<b>release</b>	208:16	85:21,22
226:4	1:18 5:4	80:12	236:7,8	88:4,15,16
235:4,7,21	316:6	83:16	275:10	98:9,10
236:17,24	<b>regular</b>	88:13 90:4	309:14	101:1
237:2	17:19	91:1 92:10	312:20	109:13
240:18	19:17 94:8	105:2,8	<b>releasing</b>	116:2
244:7	194:15	113:18,24	91:24 92:4	119:5
247:16	211:7	114:2	106:16	120:24
261:15	265:14	130:10,17	131:10	140:14
301:15,25	<b>regularly</b>	131:7,12	134:13	143:20
308:1	18:8 19:8	132:3,7,10	142:9,22	146:23
310:17	19:11	132:18	143:7,7	148:13
<b>refers</b> 44:25	<b>reiterate</b>	133:8,23	145:12	156:17
159:12	148:18,19	134:10	247:23	157:5
312:22	164:5	135:18	248:9	159:7,8,24
<b>reflect</b> 65:1	165:16	136:4	309:5	166:15
132:13	166:2	137:12	<b>relevance</b>	178:5,8,12
312:10	<b>reiterated</b>	140:21	278:25	181:24
<b>reflected</b>	285:2	142:5,17	<b>relevant</b>	184:14,19
151:20	<b>reiterating</b>	142:20	123:24	186:6
162:17	148:21	143:10	<b>rely</b> 233:18	188:25
167:13	165:3	144:12	<b>remain</b>	192:25
<b>reflection</b>	<b>reiteration</b>	145:5	235:16	194:21,21
151:12	165:13	175:18	<b>remark</b>	205:8
<b>reflects</b>	<b>related</b>	178:14	228:20	207:19
134:16	51:12,25	183:7	294:10	219:3
253:25	311:16	187:20	<b>remarks</b>	225:7,11
255:18	316:15	204:10	181:9	226:20
<b>refresh</b>	<b>relates</b>	212:13	204:21	229:9
305:12	71:10	218:16	215:18,21	231:5
<b>regard</b> 48:20	108:9	248:21	215:25	244:15,24
69:2	<b>relating</b>	292:16,17	216:2,21	255:12,13
207:25	277:4	314:19	217:1,3	255:20,23
<b>regarding</b>	<b>relations</b>	<b>released</b>	227:6,18	256:22
71:9 94:5	177:17	82:7 89:12	230:16	263:19
109:21	227:4	104:20	231:2	265:22
111:4	<b>relation...</b>	130:7,12	245:17,20	267:22

271:19,21	18:11 30:8	305:2,5,9	80:7 81:7	286:1
271:24	30:11,24	305:13	106:25	313:4
272:7	50:3,8	306:4,10	248:14,18	<b>requester</b>
273:2,2,25	58:11,13	306:14	292:4	80:13
274:5	58:18	307:1,10	307:9,25	<b>requests</b>
276:5,18	61:12	307:11	<b>represent...</b>	88:8 90:16
276:19	62:25 63:6	309:5	248:25	94:11
277:5,11	63:18,20	311:20,23	<b>represented</b>	307:17
277:20,23	63:22 74:1	312:10,13	111:23	<b>research</b>
279:22,25	77:22	312:20	117:21	9:17 12:24
280:7,7	78:15 79:4	<b>reported</b>	254:25	16:19,24
282:24	81:5,14,20	50:20 53:4	313:18	32:13
284:20	81:25	53:6 61:13	<b>represent...</b>	128:3,4
285:7,9	82:17 85:3	73:19,24	81:8 289:1	<b>researched</b>
288:6,19	85:4 91:16	75:22	<b>represents</b>	32:15
288:24,25	106:8,13	115:9	5:18	<b>resident</b>
288:25	107:14	206:2	<b>reputation</b>	39:14,15
289:12,24	110:9	<b>reporter</b>	284:8,10	39:16,17
295:23	114:14	1:18,19,19	<b>request</b>	93:22
300:11	119:9	5:4 16:11	54:19	<b>residents</b>
301:9	134:1	16:13 47:6	79:12,20	93:2,18
307:19	143:16	85:20,22	79:23 80:4	94:11
308:3	197:18	109:1,2	80:8,12,20	<b>resign</b>
311:10	200:13	135:11	81:4,9,18	272:20
<b>remind</b>	228:10	206:6	83:12,15	273:7
126:25	246:2	213:6	84:4 90:21	<b>resignation</b>
<b>REMOTE</b> 1:15	248:8	238:7	91:3 125:8	252:3
<b>remove</b>	250:7	241:15	125:14	284:3
154:16,18	259:12,14	242:15,21	130:4	292:22
155:5	260:1	247:14	131:1	294:5,6,15
156:15	261:16	256:5,6	133:16	<b>resigning</b>
165:1	269:17	257:14	140:16	294:7,14
166:13	270:17	258:13	141:25	294:23
<b>removed</b>	271:5	260:15,24	142:11	<b>resisting</b>
151:24	273:12	261:13	166:13	306:7,8
161:7,9	278:5,14	316:6,7	234:24	<b>resolve</b>
<b>removing</b>	278:15,21	<b>reporting</b>	235:5	210:9
156:17	287:3,13	1:25 48:18	276:21	211:4,8
<b>rep</b> 313:17	287:18,25	53:11	277:3	212:1,7
<b>repeat</b> 35:21	288:1	57:21 75:2	<b>requested</b>	<b>resolved</b>
47:3 80:14	290:4	191:17,18	82:10	166:6
80:15	301:11	293:21	87:18,20	<b>resource</b>
97:20	302:1,10	<b>reports</b>	96:15	89:13
104:15	302:14,16	50:23 51:3	98:25	<b>respect</b> 7:12
248:16	302:17	53:21	102:3,24	24:25
<b>repeating</b>	303:20	58:12 87:6	132:6,17	44:16
113:8	304:8,9,11	306:20	133:7	53:21
<b>rephrase</b>	304:16,20	<b>repped</b> 313:9	134:7	88:25 90:3
6:16	304:21,24	<b>represent</b>	140:8	208:25
<b>report</b> 4:8	304:25	67:24 79:9	276:19	211:2

214:11	300:13	<b>review</b> 5:14	202:12	68:9,12
293:1	310:14	16:10	203:1	71:14,16
<b>respond</b>	<b>responses</b>	20:18,21	207:3	72:9,10,19
65:22,24	37:9	20:23 27:1	233:2	74:6,7,16
191:19,19	<b>responsi...</b>	28:21 34:8	244:25	76:8,14,20
194:18,19	51:2	34:9,15,20	277:25	79:1,2,24
250:13	247:22	34:23 35:4	<b>reviewing</b>	80:18
258:21	249:13	35:11 36:5	38:14	81:11 86:2
270:19	<b>responsible</b>	36:9 37:1	89:13	86:15
271:7	51:7 76:25	37:3,16	92:18	90:15 91:5
277:3	301:24	45:5 54:25	100:21	93:9 94:19
307:23	<b>rest</b> 237:18	67:16	119:11	95:12,13
<b>responded</b>	<b>restrain</b>	71:11 86:8	121:23	96:13 97:7
37:12	232:5	86:10	122:14	98:1 99:8
193:14	<b>restrained</b>	88:23	180:11	100:15
231:25	15:4 25:9	93:16,18	244:23	102:23
238:10	188:2	93:23 95:5	<b>reviews</b>	103:2,5,9
270:18,19	191:25	95:9 96:3	291:4	103:13
313:8	193:11	97:16	<b>Ricky</b> 269:20	107:4,16
<b>responding</b>	<b>restraining</b>	98:23	274:12	108:11
167:13	285:8	99:10	276:6,8,24	109:16
238:11	<b>restraint</b>	101:3,4,5	277:4	111:20
261:5	78:2	102:3	<b>rid</b> 245:4	113:11
307:17	232:11,16	119:2	<b>Ridgeway</b>	116:14
<b>responds</b>	<b>result</b> 78:1	120:14	69:16	117:25
207:24	78:12 79:5	123:11	<b>right</b> 5:15	122:6,22
241:15	94:9	158:23	7:9,14,19	124:11,14
257:17	107:24	159:2,15	11:1,18	125:17
261:17	140:11	184:4	13:25	126:13,24
<b>response</b> 1:5	175:21,25	244:13	15:20	127:17,25
6:11 19:14	234:15	246:10	16:22,23	130:23
37:6 50:16	316:17	276:3	18:7,13	131:18
54:19 91:2	<b>resulted</b>	303:3	23:19	132:18
152:17	47:1 103:8	310:2	28:12	133:2,16
167:4,6,9	105:2	<b>reviewed</b>	29:21 30:5	134:5,12
167:17	<b>results</b> 74:5	10:13	32:14 33:3	138:12
180:18	162:11	20:11	34:13,16	139:9
187:24	277:15	21:12 35:6	38:1,7,18	141:12
188:24	<b>retained</b>	36:1 87:8	38:20,25	142:6,25
192:13	4:13	87:15	41:19,24	147:21
206:14	<b>retire</b>	93:22	42:19	148:1
228:25	291:11,12	116:23	43:21,25	151:17,21
241:4,16	291:25	119:5	45:2 46:10	151:23
242:24	292:6	124:7,10	47:2 51:9	152:1,11
246:4	<b>revealed</b>	138:17	52:3 53:24	152:18
260:21	17:5	139:2	55:15	153:23
261:2	<b>revelation</b>	162:12	57:22 58:4	154:1,25
280:21,24	271:17	163:6,18	58:7 60:12	155:13,20
297:14	<b>Reverend</b>	195:14,18	62:22,24	156:1,13
299:19	93:13	196:5	63:2,19	157:12,12

158:8	264:7,25	193:10	265:10,24	56:4,6,15
161:5,11	270:25	196:11	265:25,25	65:12 67:5
163:7,7,15	275:14	197:22	266:1,2,5	84:12 86:4
165:11,14	277:8,19	198:18	<b>Rosenfeld</b>	86:22
166:6	280:16	199:25	2:9 28:8	90:25
168:13	282:15	201:4,8,24	<b>routine</b> 10:2	92:19
170:3,4	284:11,17	202:14,22	10:7 17:10	97:12
173:24	287:10,13	210:11	23:11 26:5	107:23
180:16	292:1,11	212:13	29:20 33:6	110:6
186:2,15	302:6,6,10	214:8,12	33:9 34:8	169:6
187:13,16	303:17	217:15	34:9,15,20	170:10,13
188:25	304:1,6	219:12,20	34:23 35:4	170:19
189:3,25	307:5	226:22	35:11	247:19
190:4,5	308:8,23	229:19	37:20	248:8,20
192:14	309:18	242:9	39:13 40:3	249:7
193:6	310:15	243:20	40:14 41:8	305:23
194:23	311:4	264:17	46:4 50:15	<b>RPD's</b> 1:5
201:6	<b>risen</b> 96:23	313:15	67:4	247:23
203:1,2,21	<b>rises</b> 67:11	<b>Rochester's</b>	232:21	<b>RPR</b> 316:24
203:23	<b>road</b> 146:24	1:5 140:25	238:24	<b>ruled</b> 58:3
205:10	147:10	199:14	239:8,25	64:11
207:7	151:5	<b>Roj</b> 62:9,16	241:4	70:11,25
210:7,25	159:8	62:21,25	254:21	305:9,14
216:17	<b>Rochester</b>	63:4 64:3	258:8	<b>ruling</b> 62:22
217:18	1:3 2:4,12	64:10,25	268:15	119:2
218:18	5:18 7:18	65:10	274:21	305:21,23
219:14,25	30:12	66:13 67:8	285:11	<b>run</b> 272:11
221:17	41:19	67:17	289:1	272:18,18
223:4,11	51:25 59:5	88:11	291:7	281:12
223:19	59:25 60:9	177:4	306:16	282:1,5
227:23,24	72:18 73:9	178:9	<b>routinely</b>	<b>running</b>
229:3	74:19,23	191:1	19:11 42:8	281:7
236:23	75:3 79:12	226:19	49:24	<b>Ryan</b> 293:20
239:9,11	80:21	244:10,19	58:11	
239:13	83:24	262:10,13	65:15	<hr/> <b>S</b> <hr/>
240:2,5,9	86:13,14	262:20	314:2	<b>S</b> 2:1
240:15,22	92:24	263:5,12	<b>Rowe</b> 213:19	<b>S&amp;T</b> 19:11
243:8,9	103:12	263:17,20	213:22,23	<b>sadly</b> 73:8
244:11	107:2	264:3	<b>RPD</b> 14:8	<b>safety</b> 95:6
246:17	137:12	270:9,11	23:7 24:20	95:15
248:6	140:22	278:10,20	25:15,24	194:15
249:17	141:20	278:25	26:9,19	228:23
251:4	143:10,23	305:15	29:6 33:25	<b>sat</b> 5:22
252:23	144:12	<b>role</b> 156:8	36:2,15	85:10
253:3,5,10	160:16	169:1,8,17	40:22	129:5
254:13,17	162:8,9	170:8	48:18 49:2	<b>satisfied</b>
255:11	168:25	<b>room</b> 116:17	50:10,19	167:17
257:3,5	169:16,24	116:22	51:4,8,13	<b>Saturday</b>
262:11,25	170:7,17	139:19	51:15	298:14
263:1,4	178:17	228:3	52:16,18	<b>save</b> 8:19

<b>saw</b> 10:5	165:20	204:23	221:18	30:18, 24
33:1 45:15	166:5	205:13	293:17	31:18, 24
48:13	183:2	207:8	303:22	32:16
63:15 64:2	184:7	242:21	308:18	37:18 43:5
71:6 81:23	187:25	261:2	<b>script</b>	43:15
88:5 94:13	191:20	270:5	215:19	52:22 54:3
94:14	192:5	278:4	<b>scripted</b>	54:22 55:5
101:19, 21	198:24, 24	285:25	215:22	56:23
101:23	201:7	288:16	216:1	67:21, 21
111:17, 22	205:24	298:24	<b>se</b> 98:9	76:18 83:1
112:10	216:20	305:5	<b>search</b>	87:18
139:7, 7, 14	222:17	310:14	188:15	94:15, 25
139:15	229:9, 9	311:7, 14	<b>seated</b> 15:3	96:16, 22
143:25	239:16	<b>scene</b> 164:10	<b>second</b> 17:13	96:25 97:3
146:25	242:10	<b>scheduled</b>	21:21	97:21, 25
147:24	243:19	17:19 18:8	22:13, 19	98:12, 17
149:17, 22	252:7	19:8, 11, 17	23:6, 9, 25	99:4, 14, 23
150:4, 7, 8	253:11	33:6, 9	24:7, 21	99:24
154:23	254:15	94:8	25:13	100:7, 13
155:12, 15	267:23	<b>scoop</b> 113:8	26:18	101:14, 22
155:20, 23	271:1	113:8	27:19	102:19, 23
155:25	273:3	183:1, 1	28:14	102:24
166:19, 24	274:17	<b>scope</b> 94:1	29:25	106:14
166:24	277:11	<b>score</b> 127:24	31:19	109:22
168:4	278:20	170:25	32:24	110:15, 17
182:16	279:2, 8	214:4	33:13	111:6
217:10	280:1, 3	<b>Scott</b> 181:14	54:24	112:17
228:11	286:21	183:17	55:17	115:15
234:9	288:25	184:10, 11	154:20	116:4
239:6	289:11	184:19	156:19	118:9
240:1	290:5	185:14, 17	165:6	121:7
249:14	300:11, 17	186:17	167:2	134:5
254:7, 8	301:2	187:6, 12	184:25	142:1
258:10	305:18	188:21	219:9	144:8
268:25	312:24	192:18	237:17	146:14
269:1, 1	<b>says</b> 45:21	295:19	307:25	147:14
270:18	54:23 58:6	296:4, 16	<b>second-g...</b>	148:9
286:11, 11	63:3 66:1	299:10	129:21	151:9
291:6, 7	68:8 69:1	309:17	<b>seconds</b>	152:7
297:6	115:12	<b>Scott-Wa...</b>	311:14	154:13, 25
306:2	141:7	4:12	<b>section</b> 16:9	156:10, 24
<b>saying</b> 29:8	156:4	<b>SCOUT</b> 2:7	27:1 35:20	157:4, 23
29:13, 14	158:3	<b>scream</b> 112:4	36:2	158:8
31:17 69:4	159:12, 20	<b>screen</b> 8:10	108:18, 22	159:16, 20
70:14 72:4	162:6	8:20 30:15	205:2	161:2
81:2, 16	163:11	42:10	207:1	162:14, 18
98:11	165:12, 16	57:14	209:19	164:11, 19
101:13	166:4, 9	153:5	<b>secure</b> 87:21	166:11
118:21	190:8	186:22	<b>see</b> 8:11	187:2
126:6	191:5	201:18	17:2, 6, 24	189:19, 23

190:8	<b>seen</b> 10:9	<b>sent</b> 47:25	82:23 83:2	245:5
191:8	12:22	48:8 119:3	91:16	251:14,15
193:12,20	46:21	143:25	102:1	251:17
196:7	87:17	151:4	103:25	252:6
198:2	99:17	152:10	104:9,12	256:21
200:21	100:10	153:22	104:13,14	264:7
204:21	101:15	154:11	104:18	267:13
205:3,18	111:3	158:21	106:12	285:13
215:13	131:4	161:5	143:19	293:19
217:8,9	144:16	162:2	167:20	295:1
220:19	163:4,12	163:11	168:5	296:14
221:17,21	182:15	164:4	169:22	297:22
221:22	217:4,5	174:2,9	173:21	298:9
222:3	261:4	179:10,22	174:1,4	300:7
224:7,21	270:20	190:20,22	178:2	303:9
231:13	314:3,23	224:13	180:3,5,7	308:21,21
232:6	<b>sees</b> 121:8	245:2	181:8,18	312:19
233:4	224:20	248:2	187:16	<b>sequence</b>
236:18,19	269:3	249:16	190:11	74:7
237:15	<b>segmenting</b>	251:20,21	191:4,11	<b>sergeant</b>
238:17	14:18 25:2	254:22	192:9	93:19
240:24	25:4	259:22,22	193:4	101:2,4
243:1	<b>select</b> 171:2	259:23,24	194:23	<b>series</b> 6:9
244:5,17	<b>selecting</b>	268:13	195:4	109:15
248:5	104:19	270:9,11	196:18	167:22
249:11	<b>self</b> 185:20	270:11,14	197:18	<b>seriously</b>
253:24,25	<b>self-def...</b>	270:15,16	199:22	254:10
254:12	73:2,22	278:10,12	200:12	<b>serve</b> 164:18
257:20	74:4,11,14	279:12	202:21	164:22
259:6,21	74:15	302:15	203:23	224:5
261:19	<b>send</b> 52:22	305:22,25	207:17	<b>Services</b>
269:4	65:5 66:13	312:9	208:24	51:21 52:6
270:23	94:2 111:9	<b>sentence</b>	209:23	94:12
271:3,6	144:5,6	165:7	210:1,11	<b>set</b> 40:17
290:16,22	158:22	195:6	210:20	93:12
294:2	247:9,17	216:17	211:11	316:20
295:11	251:13	<b>sentiment</b>	212:18	<b>setting</b> 78:1
298:23	<b>sender</b> 190:1	117:11	213:1	<b>settle</b>
299:1,3	<b>sending</b>	<b>separate</b>	219:2,11	210:18
300:15	159:3	18:18	220:13	211:10
301:22	190:14	32:23	225:25	<b>settlement</b>
305:10	252:5	107:25	227:19	210:9
306:2	<b>senior</b> 17:11	143:2	230:2,9	211:19,20
313:5,6,11	19:9,12	211:21	232:9	212:11,18
314:7,18	59:9,21,22	267:10	235:20	<b>settling</b>
315:1	91:23	<b>September</b>	236:1	211:13
<b>seeing</b> 79:3	193:25	33:21 48:3	238:4	<b>setup</b> 314:11
99:3	247:18	62:6 64:1	239:19	<b>seven</b> 221:7
133:17	249:7	64:4,5,13	243:18	<b>Seward</b> 93:14
271:8	<b>sense</b> 73:19	81:19	244:20	<b>share</b> 8:20

16:2 57:14	220:9	241:25	48:17 50:8	259:1,9
82:24	236:23	<b>signed</b>	50:19,23	260:16,19
96:12	237:6	251:23	51:2 54:3	260:25
131:20	244:16	284:1	54:7,10,23	261:2,17
172:10	257:8,11	<b>signific...</b>	56:10,14	261:22
186:22	257:12	51:3 53:16	57:17	262:10
187:9	296:13	<b>significant</b>	60:16,21	263:21,22
188:23	306:21	45:18	61:12 62:9	265:4,9
191:6	<b>showed</b> 88:14	48:18,23	62:20,25	267:12
201:14	112:5,10	49:2,10,14	63:6 64:3	275:3
204:18	138:24	50:9,12,19	68:6,24	276:4,23
293:17	150:18	50:24	77:5,10	277:14
<b>shared</b>	164:8	51:12	85:19	278:19
160:16,18	165:9	52:16 53:3	87:21	279:13,24
194:17	223:7	56:18 94:4	94:21	281:25
246:7	261:16	108:22	103:16,25	283:15
301:21,21	267:24	250:11	106:16	285:5,17
310:1	268:2	<b>signific...</b>	121:4	285:25
<b>sharing</b> 8:9	290:1	58:15	139:18	286:24
42:10	291:7	225:19	146:7	287:16
204:17	313:23,24	<b>Simonelli</b>	147:8	288:10
221:18,20	314:24	38:22	152:8	289:7,21
224:17,19	<b>showing</b>	93:10	154:4	291:21
<b>shooting</b>	83:17	<b>simple</b>	161:5	293:22
50:11	117:17	208:11	162:17	294:13
57:22	302:8	<b>simply</b> 21:23	165:3,14	301:1,15
58:22	<b>shown</b> 94:5	80:10	165:21	302:23
61:16,19	100:13	166:9	166:17	303:16
70:7	115:8	<b>sincerely</b>	178:3	304:5,18
<b>shootings</b>	130:21	250:16	204:20,23	307:4
225:19	160:25	<b>Singletary</b>	205:7,21	<b>Singleta...</b>
<b>short</b> 15:7	161:19,25	8:21 10:20	206:20	45:21
108:19	254:6	10:23	207:8,24	138:19
<b>shorter</b>	255:5	11:12	208:6	152:17
108:20	267:21	12:15 14:1	209:8	167:4
<b>shorthand</b>	283:8	14:8 15:1	226:25	205:11
316:13	<b>shows</b> 116:7	16:5 20:1	229:24	206:14
<b>shot</b> 19:4	252:18	21:20	230:1	252:22
<b>show</b> 8:8	273:1,2,17	22:17 23:6	231:1,18	260:21
30:7 38:6	273:18	24:1,8	232:2,3,9	<b>Singleta...</b>
53:25	283:12	25:20	240:4	3:9,11
56:22	285:1,2	27:18 29:1	242:22,24	<b>Sippel</b> 126:3
63:10	289:5	29:4 31:21	243:4	126:17
95:22,23	290:11	32:4 33:17	251:14	127:1
98:19	299:3	36:20 38:5	252:7	163:24
109:18	<b>Shuman</b> 66:7	38:20 39:2	253:18	213:18,20
139:6	<b>side</b> 6:3	40:11	254:15,18	214:11
151:14	66:5 199:3	42:21	257:3,15	221:9
152:3	199:12	43:18	257:16	<b>sir</b> 55:16
194:25	234:20,21	47:24	258:16,23	<b>sister</b>

233:17	51:11	<b>somebody</b>	221:19	298:13
309:25	60:14	40:21	227:9	314:22
310:1	73:17	41:23 51:6	233:14	<b>speaking</b>
<b>sit</b> 7:16	98:21	51:8 52:18	239:4,17	32:21
16:20	100:17	56:7 57:5	258:25	215:18
24:12	<b>skatovic...</b>	57:21 66:3	260:22,23	<b>specific</b>
46:23	2:8	72:15 73:4	269:11	50:7 78:20
52:10	<b>skipping</b>	99:22	277:17	98:14
62:19	241:22	100:7	283:21,23	122:7
66:10	<b>slightly</b>	101:2	283:24	141:3,5
67:15	67:3	102:18	284:1,15	150:25
84:16	196:16	120:23	288:22	177:5
90:23 91:4	202:11	129:9	297:20	206:23
102:6	<b>small</b> 201:15	138:1,14	303:11	212:16
107:4	<b>smaller</b>	157:6	304:12	240:6
135:21	10:21	158:14	309:2,10	246:18
144:9	<b>Smith</b> 3:14	190:14	312:6	258:5
189:12	118:16	219:19	315:8	281:16,18
194:5	149:25	265:12	<b>sort</b> 6:6	285:23
205:24	151:4,9	281:6	18:8 24:20	<b>specific...</b>
207:12,13	153:22	297:6	60:7 62:1	103:20
218:12	154:22	<b>somebody's</b>	113:9	110:20
252:19	155:14	218:3,4	115:18	124:15,17
302:22	157:21	303:2	128:15	124:22
<b>situate</b>	158:14,17	<b>someplace</b>	149:4	128:25
189:19	160:22	147:11	157:12	131:23
<b>situation</b>	162:5	<b>something's</b>	199:11	149:13
9:10 37:12	165:2,12	112:21	276:16	201:6
39:18 40:4	165:19	<b>Sommers</b>	311:3	204:10
40:14,16	166:2	144:4	<b>sound</b> 183:1	210:16
41:7 42:3	280:11	<b>soon</b> 30:16	<b>sounded</b>	211:2,18
50:6 55:9	303:21	200:16,17	258:17,20	212:3
56:12 57:8	308:23	200:17	<b>sounds</b>	222:11
60:19 70:3	312:9,21	<b>sorry</b> 14:21	138:14	244:24
74:5 88:18	<b>Smith's</b>	22:22 23:1	<b>source</b> 89:10	246:15
92:5 100:6	156:4	28:10 47:3	<b>sources</b>	247:8,17
101:8,14	157:4	47:20	294:16	249:10
148:20	159:12	55:16 60:4	<b>speak</b> 42:21	275:20
150:17,21	163:10	60:6 64:5	47:12,23	279:14
172:13	166:4	77:1,22	69:8 72:13	284:25
213:10	<b>social</b>	83:11	128:14	<b>specifics</b>
228:17	225:21	102:11	135:16	207:25
278:17	<b>sock</b> 14:2,5	115:1	136:22	286:25
289:16	24:8 30:2	122:4	215:22	287:11
300:14	112:7	124:5	245:16,19	<b>specify</b> 49:9
301:8	120:1,4,17	132:2	262:14	<b>Spectrum</b>
313:14	191:24	134:6	263:5,7,8	56:22
314:13	233:9,9	152:22	263:10,24	<b>speech</b>
<b>situations</b>	254:3	192:11	264:5	227:12
40:18	267:24	199:7	292:13	<b>spit</b> 14:2,5



120:17	25:8	10:9	259:4,4,4	257:10,10
191:24	121:24	132:11	<b>Stephanie</b>	<b>stuff</b> 6:3
233:9,9	125:20	136:2	62:4 83:4	260:18
254:3	127:16	258:22	144:3	261:1
267:24	142:14	288:22	245:4,13	274:11
<b>spitting</b>	220:15,18	306:9	246:7	<b>subject</b>
191:24	222:7	<b>statement</b>	<b>steps</b> 15:13	35:19
<b>spoke</b> 23:6	301:19	56:11 85:8	94:23	77:10
32:9 33:17	<b>Standards</b>	132:21	175:21,23	153:25
56:18 68:6	16:9 27:1	138:4	177:9	223:22
69:1 113:6	35:20 36:2	150:11	178:21	225:3
129:5	205:2	160:24	<b>stick</b> 205:10	259:15
180:1,16	206:25	161:23	<b>stimulate</b>	276:2
181:13	209:19	162:1	21:18	296:8
184:23	<b>standing</b>	164:15	41:15	<b>subjective</b>
185:17,24	39:16	169:8	<b>stimulated</b>	75:18
186:18	<b>start</b> 7:9	173:15	148:12,12	139:1
191:21	20:16 97:4	180:10,19	187:18	<b>submitted</b>
194:22	195:5	187:9	<b>stood</b> 221:9	79:11
195:22	220:14	198:3	<b>stop</b> 6:23	83:12,24
196:17	309:2	199:25	8:20 88:23	<b>subpoenaed</b>
219:1	<b>started</b>	204:2,4	<b>stopped</b>	276:12
254:16	249:17	207:18,20	112:16	<b>subsequent</b>
262:10	254:24	219:20	<b>story</b> 193:9	180:4
263:22	267:14	220:7	258:19	305:8
266:23	<b>starting</b>	222:10	280:4	<b>subseque...</b>
285:5	213:8,8	223:3,5	<b>straight</b>	160:8
296:4	234:21	226:7	17:25	242:10
298:18	238:7	243:19	<b>street</b> 2:13	<b>substance</b>
<b>spoken</b> 39:1	243:24	244:2,11	11:9 19:5	229:13,15
68:15	<b>starts</b> 154:3	244:13,19	22:6 37:23	<b>succumbed</b>
128:9,20	156:20	244:25	56:4,19	156:22
128:21,24	<b>state</b> 1:20	257:2	265:14,16	157:2,10
129:1	5:5 6:2	294:5	<b>streets</b>	157:22
187:25	11:21	<b>statements</b>	178:16	158:3
203:24	114:4	11:12,13	<b>stretcher</b>	<b>succumbing</b>
<b>ss</b> 316:3	129:14,15	22:10	26:12,14	158:5,13
<b>stabiliz...</b>	129:17,20	36:21	<b>strike</b> 11:24	<b>sue</b> 107:8,12
14:13	137:1	56:15	17:25	107:19
24:24	138:8	137:13	18:20 39:1	222:16,17
<b>staff</b> 39:12	143:5	199:22	44:3 53:1	<b>sued</b> 125:25
51:9 163:5	144:24	203:21	68:22	126:1,16
163:13	203:9,10	213:16,25	73:16	126:19
187:23,23	207:4,6	218:17,21	125:2	213:12
269:15	214:6	243:21	142:7	234:22
291:12	242:17	<b>stating</b> 9:1	151:12	<b>suffered</b>
293:22	306:6	119:16	213:4	140:11
294:6	311:15	<b>stay</b> 273:7	215:15	<b>suffering</b>
<b>stamped</b> 3:15	316:2,8	291:25	227:16	12:5
<b>stand</b> 15:3	<b>stated</b> 8:24	<b>step</b> 35:1	252:20	<b>suggest</b>

266:25	21:17	209:18	<b>take</b> 6:19,22	158:6
311:18	24:13	260:20	7:12 13:24	177:10
<b>suggested</b>	35:22 49:4	261:7,10	26:14	232:19
138:14	64:6 75:10	292:7	30:13	241:3,5,5
248:7	76:7 80:3	<b>surrounding</b>	32:12	241:6
253:1	80:17	107:14	55:18,22	256:17
<b>suggesting</b>	88:17	<b>suspect</b>	60:9 78:18	308:11
209:11	95:23	156:7	89:22	310:9
239:15	133:3	<b>suspend</b>	108:19,20	316:11
275:11	134:21	121:19	125:9	<b>takes</b> 74:3
<b>suggestion</b>	145:18	122:8	129:21,25	163:1
218:15	157:10	127:14	131:24	<b>talk</b> 36:21
312:15	158:16,24	220:23,25	138:18	46:13 62:1
<b>sum</b> 229:13	161:9	222:18	142:13	105:16
229:15	165:15	223:10	146:6	114:6
<b>summarize</b>	173:16	234:4	150:23	127:13
100:5	190:2	249:8	175:21,24	129:9
<b>summary</b>	195:9	250:11	178:20	133:23
30:23	196:15	<b>suspended</b>	185:1,3,8	147:15
132:2,25	199:8	123:7,13	185:9	149:20
134:2	211:16	222:24	189:16	185:4
135:14	215:2	230:22	196:19	189:8
<b>summer</b>	216:3	246:25	201:13	195:13
168:25	222:14	249:25	204:15	204:9
170:7	225:17	250:3	213:5	207:12
177:22	226:12	251:22	240:20,21	208:21
225:23	227:5	<b>suspending</b>	242:13	223:13
<b>Sunday</b> 68:2	229:13	221:14	256:10,15	226:25
256:21	237:2	222:1	275:13	229:4
264:23	249:14	223:18	295:3	234:1,20
<b>supersede</b>	253:12	249:18	296:12	234:24
214:19	255:18	251:11	300:24	235:6
<b>superseded</b>	272:4	<b>suspension</b>	302:5	241:13
201:4	276:15	163:14	303:10	242:24
202:8	294:9	222:12,13	<b>taken</b> 1:16	245:14
<b>supersedes</b>	308:7	251:1	9:4,5	249:24
129:16	309:6	<b>switch</b> 42:9	10:11,24	263:1,2
137:2	310:9	<b>sworn</b> 274:3	11:14 12:3	264:1,13
203:9,10	<b>surmise</b>	274:4	13:13	264:14,22
203:14	303:13	<b>sworn/af...</b>	14:10	279:24
242:9	<b>surmised</b>	5:3	21:22	303:2
<b>supervisor</b>	160:4	<b>system</b> 60:16	36:12	309:16
93:23,23	<b>surprise</b>	60:23	55:24	<b>talked</b> 15:9
101:3,4,9	261:2	95:24	74:14	18:22
<b>supporting</b>	314:20	162:25	76:19	19:13,20
306:14	<b>surprised</b>		77:14	59:17
<b>supportive</b>	46:17,22	<hr/> <b>T</b> <hr/>	144:24	86:16
144:10	64:19,22	<b>T</b> 316:1,1	145:25	87:11
<b>sure</b> 9:19	67:16	<b>taint</b> 123:14	147:1	105:1
19:15	106:14	206:16	156:23	108:16

128:8	275:13	171:16	55:13	112:19
137:20	<b>tased</b> 41:4	172:5,19	77:12	<b>testified</b>
184:16	<b>taser</b> 41:1	172:20,23	99:22,25	5:6 23:17
185:21	41:23 42:3	172:24	112:18	97:23
189:5,8,11	42:4	173:18	118:1	99:13
193:16	<b>task</b> 267:8	174:18,24	134:3	106:1
195:16	<b>taunting</b>	175:6,11	141:12	109:9
196:18	113:7	183:21	142:24	114:11
215:8	<b>team</b> 19:9,12	185:25	171:15	116:20
216:1,16	89:22	191:20	189:2	117:4
216:20,25	194:1	204:4	215:10	118:18
230:15	197:1	210:17	218:3,4	136:10
255:21	259:20	218:21,25	235:18	145:19
258:14	<b>technical</b>	226:6	246:21	153:21
262:4	310:9	230:25	255:12	177:3
265:1	<b>technique</b>	250:18	257:23	236:12,15
266:16	14:18	252:12	258:18	268:20,21
274:10	113:1,3	254:7	269:8	277:6
289:13,14	120:9,21	262:20,25	272:17	283:11
<b>talking</b>	123:9	263:8,10	273:13	287:15
21:12	<b>techniques</b>	263:12,15	278:13	288:4,13
37:22	14:13	266:22	286:8	288:21,22
69:12,25	182:22,22	267:9,11	<b>Ten</b> 55:23	295:18
80:8,9	<b>tell</b> 6:15	268:25	<b>tension</b>	296:11
104:13	8:21 11:7	269:25	142:9	300:22
119:21	11:11,12	270:6	<b>term</b> 14:4	304:3
146:3	12:15,19	271:23	24:23 25:2	306:24
147:1,11	13:2 14:8	273:15	32:2,8	307:21
169:21	15:12	274:2	72:8	<b>testify</b>
185:13	18:17 22:1	276:6	119:21	209:5
212:18	22:9,17	277:10	124:22,24	272:3
227:3,14	25:21	279:23	188:16,17	287:17,24
231:15	36:23,23	280:3,20	<b>terminate</b>	289:8
233:6	49:3,3,6	282:14,19	227:22	<b>testifying</b>
267:14	63:21	282:22	304:10,17	126:17,20
270:8	67:22	283:1	307:4	131:18
272:5	89:17	284:6,12	<b>terminated</b>	274:17
281:25	92:17	284:22	304:5	<b>testimony</b>
285:7	105:13	285:3	<b>termination</b>	7:6,12
301:10	117:19	287:16	163:14	56:3 64:17
302:9	119:7	288:5,10	<b>terms</b> 75:2	71:4,21
308:25	121:1	292:18	119:19	72:2
<b>talks</b> 134:3	127:18	296:6,22	147:17	132:22
158:4	128:23	297:24,25	149:5,14	167:24
202:4	129:3	301:9,13	149:15	202:17
312:14	131:6	302:3,20	188:16	211:25
<b>tame</b> 260:10	133:5	302:20	204:9	248:15,19
<b>tap</b> 299:2	149:1,10	303:1,2	206:21	249:1
<b>tape</b> 116:4	149:11,13	304:9,16	213:4	253:2,2
121:3	150:10	<b>telling</b>	<b>terrified</b>	274:4

286:1,16	81:6 114:7	171:21	157:5	<b>Thompson's</b>
<b>text</b> 4:10,12	118:25	177:20	163:17,23	313:17
8:15 42:15	163:7	182:22	165:22	<b>thorough...</b>
43:2,17	180:23	184:17	167:12,23	315:3
47:8 48:24	188:20	185:15	173:20	<b>thought</b>
49:7,15,20	260:11	186:7	182:2	12:12
49:21 50:2	274:24	189:9,11	190:13	22:24 42:2
59:7,20	308:10	189:13	192:25	68:19 87:9
61:3,7	315:5,9,11	192:3	193:1	99:17
187:2,5	<b>Thanks</b> 99:25	196:18	198:22	101:5
189:18,20	237:14	203:22	202:13	127:10,11
190:14,16	315:6	213:12	208:9,18	127:14,15
190:18,20	<b>thereof</b>	224:21,21	209:7,13	127:17
190:22	316:18	225:6,22	218:3,11	139:7
191:4	<b>thing</b> 28:18	227:15	222:5	162:23,23
192:4,5,8	42:12	248:6	228:25	187:9
192:9,12	68:10 97:6	250:7	230:5,10	188:22
192:12,13	113:1	251:25	230:21	207:13
192:16,17	151:1	252:3	237:18,21	261:5
192:20	153:15	253:7	252:19	283:17
193:4	186:23	255:9	256:8,15	310:18
194:19,20	242:23	269:10	257:23	314:23
243:24	275:25	274:7	262:6,24	<b>thoughts</b>
251:13,21	300:4	276:20	263:2	56:24
252:5	303:11	279:8	264:22	<b>threat</b>
254:21,24	310:14	303:4,12	265:6	291:11
259:24	313:4	303:15	269:22	<b>three</b> 57:25
265:17	314:11	306:24,24	272:24	76:16
268:13	<b>things</b> 9:17	309:15	273:23	78:24
270:14,15	12:9,24	310:6,9	274:14	82:19
270:16,23	17:4 18:18	<b>think</b> 5:11	275:8	95:10
271:4	37:18,18	7:6 8:1,10	278:14	157:14
277:25	38:11	11:16 14:6	280:23	182:20
278:1,3	41:10	16:16,20	293:4	<b>throwing</b>
290:3	55:13	22:24	298:17	192:1
298:3,5,19	66:11	23:10,17	305:23	289:22
298:19,23	76:16	25:18	307:11	<b>thus-and...</b>
302:6,6,8	82:13,22	27:24 32:6	308:5	94:25 98:1
302:13,15	85:13	36:9 38:5	314:17	<b>tick</b> 260:13
304:19	91:17	41:5 56:17	<b>thinking</b>	<b>tightened</b>
305:1,3	108:4,11	73:8 75:16	139:1	112:7
308:22	115:19	88:15	299:17	120:1,4
309:1	126:4,7	113:9,13	<b>thinks</b> 138:3	233:9
310:18	145:19	133:10,18	<b>third</b> 95:20	267:25
311:2	146:4	135:2	160:23	<b>tightening</b>
<b>texted</b>	149:6,24	138:9	164:4	254:3
188:21	150:8,25	143:22,22	229:20,22	<b>till</b> 86:12
297:8,10	152:24	144:22	<b>Thompson</b>	<b>Tim</b> 33:5
297:10,11	159:1	145:13	313:22	79:18 83:1
<b>thank</b> 30:17	167:10	153:14,21	314:8	83:4

109:20	106:6	279:4	303:20	121:4,24
110:2	108:2	285:21	<b>Timothy</b>	122:7,14
151:16,19	109:14	290:4	31:14	125:20
174:24	112:13	291:13	<b>tired</b> 292:20	126:15,21
233:2	113:21	293:2	292:21,21	127:16
237:9	114:4,25	294:10	293:6,13	128:7
251:23	120:16,22	295:7	<b>title</b> 39:3	130:24
<b>time</b> 6:14,20	120:22	297:4	<b>titles</b> 38:25	132:13,16
6:22 7:21	125:14	299:14	<b>today</b> 5:17	132:21
7:22 8:7,8	130:15	301:13	6:8 7:7,11	133:13,22
9:16,16	132:7,10	306:25	7:16 8:8	134:16,17
11:14 14:9	133:8	310:7	24:12	135:2,4
16:15 18:1	137:21	316:11	36:21	136:22
18:15	141:8	<b>timeline</b>	46:23	139:16
20:20 23:6	142:9	3:19 82:11	62:19,23	143:18
26:7 27:13	143:18	82:12,14	66:10	145:20
30:1 33:10	145:2	82:15,17	67:15 81:1	150:16
33:14	146:9	83:3,6,21	84:16	165:24
36:19	147:17,25	84:1	90:23 91:4	170:2
38:21 39:4	161:16	235:15	102:6	172:8
41:21 45:4	163:1	236:17,22	107:4	173:5
46:20	170:17,18	237:2,3	132:23	175:4,9
47:13,25	171:14	258:14	144:9	179:12,15
48:16	178:17	259:3	164:8	182:16,17
51:14 53:2	179:24,25	279:7	165:8	182:21
53:15,15	181:3,5,13	307:9,16	189:13	183:5,6,11
56:16,17	184:19	307:25	194:5	183:20
58:18	195:8,18	309:7,12	205:24	184:3
59:23	197:9	309:16	217:13	193:18,23
63:11,15	200:19	310:19,20	218:13	194:12
64:2,9	205:5,23	312:14	220:17	202:10
65:12	206:8	<b>timeline...</b>	221:15	204:3
70:24 71:3	213:25	237:11	222:2	216:13
71:21	215:6	<b>timelines</b>	231:23	217:9,11
73:18 78:5	228:10	237:1	252:19	230:12
78:10,13	235:2,2	307:22	294:1,12	231:9,18
79:19 81:1	238:11,20	<b>timeliness</b>	<b>told</b> 10:23	235:8
81:3,12,17	245:20	53:21	11:16	238:9
82:11	248:2	<b>timely</b> 50:23	23:18	239:20
83:21	257:5,19	53:5	31:21 32:2	240:3,16
84:22 85:1	258:19	<b>times</b> 49:13	32:3 33:17	242:23,23
85:3,11,16	259:11	51:19 94:3	39:2,7	243:9
86:3 88:6	261:3	99:15,15	53:7 63:25	250:6,24
89:24	262:1	126:1,1	76:5 96:2	251:11
90:14,18	263:3	135:3	112:1,5	253:18
91:5 93:10	266:9,23	137:21	114:5,20	254:15
93:11,19	269:16	213:11	115:16	255:10
94:16,21	273:10	234:22	117:23	260:16
96:3,7	274:20	282:13	118:3,4,6	267:16
102:1	275:24	301:3	118:17	268:17

269:14	<b>train</b> 93:1	242:12	<b>two</b> 9:15	<b>ultimately</b>
270:13	<b>training</b>	280:16,20	12:9,11	156:22
271:14,14	51:6 55:1	280:21	16:21	157:1,10
271:17,21	55:3,10,14	281:24	23:24	157:22
277:15,17	<b>transcript</b>	316:12	25:19,22	158:3,5
277:17,22	3:17,20,22	<b>truly</b> 118:12	26:25 29:3	172:15
282:20	3:24 4:3,6	224:4	32:22,22	231:8,10
285:5,12	195:3	233:13	33:18 50:3	231:16
285:13,14	220:11,15	<b>truth</b> 189:3	90:14	<b>unaware</b>
287:4,19	231:6	218:4,4	115:19	212:1
287:21,23	238:4	220:18	143:2	<b>unbeliev...</b>
288:3,23	242:14	257:23,24	146:17	260:8
295:25	251:18	258:1	151:7	<b>uncle</b> 265:6
297:25,25	257:9	269:25	152:4	<b>unconscious</b>
298:5,5,15	258:13	270:1,1	153:3	36:17
301:5,18	293:19	274:18,19	184:16	39:25
302:3	294:25	280:8	201:18	285:21
303:4,8	299:24	288:5	255:22	<b>underplayed</b>
313:22	<b>transcri...</b>	289:15,25	256:1	156:8
<b>top</b> 4:10	316:13	290:6,8,8	265:24	<b>understand</b>
16:18 62:3	<b>transferred</b>	<b>truthful</b>	268:19	6:14,15
83:1	83:7	6:11 7:6	297:17	7:11 13:18
131:24	<b>transpar...</b>	9:20 288:5	298:18	25:17 45:9
193:15	92:25	<b>truths</b>	302:11	45:15
196:20	<b>transparent</b>	267:10	311:13,16	54:10 55:7
231:7	93:5	<b>try</b> 10:21	<b>types</b> 241:4	58:9 67:2
300:25	<b>transpired</b>	292:13	294:22	68:5 72:7
<b>topic</b> 16:22	93:5	<b>trying</b> 18:18	<b>typically</b>	75:9 80:13
17:16	148:17	41:15	73:24	80:14
105:4	<b>treated</b>	100:5	<b>typo</b> 157:6	119:18
173:14	43:24 52:2	107:16	311:11	134:24,25
223:2	94:13	122:6		138:25
263:9,11	113:7	200:24	<b>U</b>	143:1,21
311:17	212:8	238:19	<b>UCLM</b> 93:14	156:20
<b>topics</b> 18:21	260:8	239:19,23	<b>Uh-huh</b> 24:16	157:17
20:1 184:9	<b>treating</b>	240:23	26:6 28:23	187:11
184:13	260:5	242:2	36:13	188:24
<b>total</b> 108:8	<b>Trevyan</b>	260:23	38:24	197:8
<b>touched</b>	213:19,22	268:8	49:19	198:15
239:15	213:23	282:17,18	70:19	199:4,13
<b>tough</b> 272:23	<b>trial</b> 74:16	282:23	77:23	199:21
273:4	<b>tried</b> 15:3	302:20	111:7	200:1,23
<b>town</b> 177:20	25:8	<b>turned</b> 10:3	142:21	202:9
181:23	191:25	10:6 100:1	157:16	208:2
<b>track</b> 60:8	<b>trigger</b>	238:15	171:6,20	211:16
<b>tracking</b>	56:24	246:23	230:17	222:5,16
61:22	<b>trouble</b>	<b>Tweet</b> 297:6	246:3	229:6,7,12
<b>trade</b> 233:15	300:4	297:11	261:7	254:12,14
<b>traffic</b>	<b>true</b> 72:24	<b>twice</b> 17:7	284:21	261:21
50:11	235:1	32:16	299:19	264:3

270:21	238:23	<b>undertaken</b>	230:22,23	163:10
278:19	242:12	90:1	231:1	164:14
285:22	243:8	<b>unequivo...</b>	263:17	190:7
286:13	244:8	259:1	272:9,9	<b>versions</b>
306:23	245:7	<b>unfolded</b>	280:10,14	237:22
<b>understa...</b>	246:5	252:14	289:24	<b>versus</b>
9:3 11:23	251:7,8,8	<b>Unfortun...</b>	<b>urge</b> 221:15	166:24
11:25	258:7	197:17	<b>use</b> 1:5	<b>viable</b> 282:9
25:23 26:6	264:1	200:12	24:23	<b>Vice</b> 193:5
26:19,24	266:7	215:9	93:19,20	193:14
27:7,12	267:5	<b>Unidenti...</b>	101:3	194:6,18
29:19,23	268:2	206:5	124:22	<b>victim</b> 57:22
34:13,19	270:3	<b>uniform</b>	224:19	72:15
35:2,10,24	275:20	265:14	288:11,18	<b>victim's</b>
36:10,15	278:24	<b>union</b> 222:16	<b>uses</b> 50:9	49:24
43:1 61:11	279:5	222:17	<b>usual</b> 185:20	<b>video</b> 1:25
65:9 66:12	282:4	305:25	<b>usually</b> 10:2	10:9,14
68:14,22	289:15	306:3	59:8 61:2	12:23
73:14	290:6	<b>Unit</b> 27:20	66:25	15:16,20
75:24	296:23	84:12,21		15:23 16:2
81:22 86:8	<b>understa...</b>	85:9,17	<b>V</b>	20:12
91:23 93:2	263:25	86:4 205:1	<b>vacation</b>	21:12,13
97:10	<b>understood</b>	206:25	51:5	24:15
100:18	7:2,22	<b>unrelated</b>	147:21	25:11 28:4
106:7	12:9 15:19	311:17	182:4	36:10 37:1
108:8	21:11	<b>unrest</b> 169:7	224:25	37:3,5,7
109:25	23:12	170:16	<b>vague</b> 157:12	37:11,17
113:21,22	25:14	225:21	<b>van</b> 41:3	38:10,14
117:23	26:18	<b>update</b> 18:12	<b>Vaughn</b>	38:19 39:5
118:1	33:24	18:13	118:11	39:11,13
126:14	35:17	48:23	120:2	41:6 46:21
129:15	43:20 45:1	<b>updated</b> 19:6	164:10	48:13
130:9	46:13	19:6 166:9	183:2	54:13 55:2
133:21	55:12	<b>updates</b>	<b>Vaughn's</b>	71:2,7,12
134:8	75:20	19:17 50:5	112:23	77:19 78:3
137:2,7	79:23	166:5,14	<b>verbally</b>	81:24,25
145:5	85:16 86:3	<b>upload</b> 163:1	154:24	82:6,21
166:1	92:6 114:5	<b>upset</b> 54:15	155:16	83:15 87:5
175:25	126:11	87:4	159:5	87:5,8,10
179:1,5	136:8	111:21	<b>verbatim</b>	87:15,17
192:15	137:24	112:21	33:19 88:9	87:19
194:9	140:19	117:8	99:6	88:21,25
198:7,9	142:15	127:10	134:22	89:21,23
201:11	198:17	146:25	137:3	90:3,5,16
207:2	199:9	150:12,19	149:19	90:19 91:8
209:2,6	204:13,14	150:21	308:2	91:15 92:3
210:8	214:20	166:18,19	<b>version</b>	93:1,17
218:6	223:15	178:18,19	62:21	94:6,16
227:17	234:11	187:21	154:11	96:4,16,22
235:12	303:4	194:14	159:18	97:3,13

98:12,18	147:24	267:21,23	123:8	9:14 10:20
98:19,23	149:17,22	268:2,4,25	138:22	21:17
99:3,6,10	150:5,18	269:1,13	164:16	29:12 36:8
99:14,17	154:23	272:25	223:5	43:3 47:16
99:23	155:15,20	273:2,17	228:17	55:18 62:1
100:7,10	155:23,25	283:8,9,12	<b>viewing</b>	64:6 72:1
100:13,20	156:1	283:13	77:18 78:3	80:17 84:8
101:15,18	160:25	285:1,2	91:15	94:15,24
101:19,21	161:19,25	286:11	114:18	96:17
101:22,23	163:4,12	290:1,10	117:3	97:25
102:23,24	164:9	290:13,15	120:15	101:14
104:20,25	165:10	290:16,20	146:21	108:19
105:3,7,8	166:18,23	293:24	<b>views</b> 223:15	109:3
105:9	166:24	295:7	<b>violation</b>	113:16,17
106:17	174:13	296:22	131:7	114:8
107:13,15	176:2,20	305:25	204:12	122:16
110:3,15	179:14	306:3,19	<b>violence</b>	129:25
110:17	180:2,8	313:2,22	70:7	130:9
111:1,3,6	182:15,16	313:24,24	225:13	131:20,23
111:9,16	182:16,25	314:2,4,7	<b>violent</b>	133:3
111:19	183:4,8,13	314:24	225:18	134:24
112:5,5,9	183:18,24	<b>videos</b> 90:14	<b>virtue</b>	135:8
112:13	183:25	92:23 93:3	190:14	138:13
113:13	187:21	224:18	220:6	139:23
114:13,14	195:4	259:19	<b>visible</b>	145:7,18
114:16,17	204:11	<b>videotape</b>	115:25	151:1
114:22,24	206:1	89:11,13	116:5	152:21
115:2,3,6	217:4,5,8	115:25	<b>visibly</b>	153:3,17
115:8,9,12	217:9,10	116:13	117:8	167:19
116:10,23	220:12	146:21	<b>visiting</b>	171:7
117:4,9,12	223:6,7	<b>view</b> 15:16	8:25	189:16
117:17	224:19	48:25 55:2	<b>voice</b> 149:7	193:2
119:11,25	231:11	65:1 88:1	166:5	195:7
120:3,16	233:2	128:16		197:8,10
121:7,8	234:9	137:17	<hr/> <b>W</b> <hr/>	197:11
127:12	236:6,7	140:22	<b>Wait</b> 104:10	200:23
130:10,21	239:3,6,7	141:1,13	242:19	206:15
131:4,10	240:1	141:22	<b>waiting</b>	207:22
131:12	241:9	143:14	16:14	215:4
138:17,22	243:7	145:11	85:25	218:11
138:24	246:16,19	161:17	147:5	222:6
139:2,7,8	247:7,9	172:17	191:23	229:6,18
140:8,16	252:17	177:11	<b>wake</b> 103:12	231:23
142:1,5,10	253:24	227:24	106:5	241:7
142:17	254:1,8,11	247:21	170:7	242:13
143:7	255:5	255:4	192:19	255:18
144:6,8	258:10	<b>viewed</b> 82:21	294:5	256:13
145:5,11	259:21	91:8	<b>walk</b> 304:15	260:13
145:12	261:4,6	104:25	<b>Wanda</b> 69:16	264:13
146:25	267:15,16	121:3	<b>want</b> 6:19	272:18,20



272:21	280:7,15	213:5	114:16	284:14,15
273:7	287:17	217:13	115:3,25	284:16
286:2	309:6,20	218:13	116:12	289:12
288:15	310:8,20	219:10	241:8	301:20
291:25	312:3,16	220:12	<b>way</b> 13:6	302:12,15
295:3,9	<b>wants</b> 171:19	236:25	24:17,18	306:1,6
296:13	191:5	237:7	28:14	307:14
299:22	192:10	242:13	34:12	314:12
303:5,21	198:22	243:16	37:11	<b>ways</b> 59:6
304:13	<b>WARD</b> 2:3	244:18	47:22 49:3	92:21
306:23	<b>Warren</b> 1:15	252:20	49:4 50:8	95:10
308:6,19	3:3,15 4:7	257:13	51:24 53:7	<b>we'll</b> 6:23
312:10	5:1,9	261:16	63:16 67:1	33:22
<b>wanted</b> 28:7	25:13 30:4	293:18	69:4 70:15	36:21
49:1 54:15	30:11	298:3	71:22 72:1	46:13 48:5
58:20	42:25 43:3	299:23	72:23	105:25
92:24,25	51:12 54:1	300:3	73:25 76:7	150:24
98:17	56:2 57:16	307:14	77:3 95:22	173:14
102:19	61:25	308:16,19	100:19	195:13
121:19,22	67:25	316:11	101:1	266:20
122:8	73:18	<b>wasn't</b> 25:16	103:23	293:15
148:18,19	79:10	57:11	116:1	<b>we're</b> 6:6
149:19,25	82:25	58:22	125:13	7:11 14:15
150:4	88:20	98:14	127:18	60:2 74:25
154:19	98:21	111:25	138:4	101:24
155:11	109:8,19	118:11	150:9,24	103:3
157:8	131:24	124:18	151:13	105:24
158:24	133:19	127:11	155:17	110:1
159:2,6	136:10	131:2,9	161:15	113:15
166:22	151:2,3	137:8	165:12	121:1
171:22	152:5,5,6	160:15	178:24	125:16
172:18	152:6,7,16	226:11	181:22	145:2
173:1	152:24	242:12	195:10	146:3
180:11	153:6,21	244:25	196:16	205:10
183:12	154:21	248:7	215:20	224:20
186:15	156:19	249:4	226:3	257:13
199:8	157:19,20	250:15	227:1,2	273:5
200:24	158:8,11	261:10	229:1	293:2,14
217:10	158:11	276:25	231:17	<b>we've</b> 30:10
222:14	163:10	280:21	234:13	42:7,24
227:5	164:13	284:6,12	239:17	54:1 55:19
235:16	166:16	291:14	249:5,6	57:15
238:3	167:2	294:21,22	253:15,15	61:25
241:9,11	178:14	297:18	258:11	82:25
241:13,24	187:2	303:10	261:9	125:15
245:10	188:6	306:2,8	263:17	131:20
252:4	189:17	310:23	268:6	150:22
262:17,20	195:1	<b>watch</b> 95:16	277:20	153:20
265:2,18	204:16	<b>watched</b> 71:2	283:1,21	173:20
273:7	209:19	111:16,18	283:21,23	188:5

194:25	237:24	85:21	244:1	59:16
220:10	274:13	300:11,19	<b>writes</b> 132:1	63:14
235:14	294:4	<b>words</b> 13:5	164:5	97:21
244:18	<b>West</b> 2:13	17:24 32:1	<b>written</b>	104:16
252:16	19:5	38:11	60:20	157:13
260:4	<b>WESTERGAARD</b>	78:20	305:5	174:23
293:18	2:17	129:5	<b>WROC</b> 299:25	191:19
298:3	<b>WHAM</b> 3:24	158:21	<b>wrong</b> 10:13	229:13
308:19	293:19	228:23	10:14	248:17
<b>wearing</b>	<b>whatsoever</b>	229:11	15:16	250:24
15:22	206:17	252:13	28:22 33:3	266:15
<b>Wednesday</b>	239:22	267:23	35:14	295:12
187:16	<b>wheelhouse</b>	282:13	94:13	299:2
<b>week</b> 30:8	215:6	284:18	112:21	311:21
42:14 68:1	<b>When's</b> 63:14	289:23	113:5	<b>year</b> 53:15
131:23	<b>WHEREOF</b>	<b>work</b> 88:23	121:21	58:14,21
176:21	316:19	88:25	123:1	58:23,23
193:19,24	<b>willful</b>	92:20	133:12	58:24 60:1
258:16	302:18	144:7	147:15	61:16,17
<b>weekend</b> 60:5	<b>Willie</b> 193:6	171:25	150:7,8	61:19
<b>weeks</b> 188:13	<b>win</b> 241:25	211:13	194:3,11	67:25 73:9
<b>Weir</b> 31:14	<b>window</b>	212:7	222:25	74:23 75:8
33:5	162:24	292:1	242:19	75:12
<b>well-put</b>	<b>winter</b> 22:7	301:1	250:19,25	186:11
174:23	<b>wise</b> 316:16	<b>worked</b> 6:2	253:24	291:3
<b>went</b> 10:4	<b>wish</b> 217:3	101:2	254:1,8,11	<b>year's</b> 58:7
16:19 17:1	<b>withhold</b>	<b>working</b>	268:4	61:22
32:23 33:6	179:17	200:14,16	269:1	<b>years</b> 40:24
87:9	<b>withholding</b>	210:22	286:12	57:25
101:11	92:3	211:14	289:3	273:14
113:14	130:12	<b>works</b> 210:22	290:10,13	292:23
120:11	258:18	211:8	290:14	<b>yell</b> 112:4
123:11	259:18	<b>world</b> 249:5	303:11	<b>yesterday</b>
162:16	<b>witness</b> 2:13	<b>wouldn't</b>	306:11,15	188:11
175:2,7	3:2,7 5:2	61:18	306:19	235:12,20
182:1	135:15	72:22 73:5	<b>wrote</b> 62:20	<b>York</b> 1:20
244:14,23	153:13	100:15,17	154:22	2:5,5,14
250:6	271:20	120:7	227:11	2:14 5:5
251:17	277:7,10	177:22	245:2	5:13 6:3
255:19	277:12	185:6	299:6	132:5
268:7,16	315:5,8	234:18		133:6,14
268:20	316:10,19	241:5,5	<b>X</b>	138:8
269:5	<b>witnessed</b>	254:7,9,10	<b>X</b> 3:1 4:1	193:10
270:22	231:11	268:25	101:20	203:10
271:25	<b>woman</b> 228:13	286:10,11		316:2,4,8
272:8	<b>wondering</b>	<b>write</b> 49:8	<b>Y</b>	<b>young</b> 276:8
285:21	275:12	147:6,7	<b>Y</b> 101:20	<b>Yudelson</b>
314:7	299:2	148:14,21	<b>Yantise</b>	226:16
<b>weren't</b>	307:24	149:9,10	309:24,25	237:9,12
22:25	<b>word</b> 85:21	149:12	<b>yeah</b> 16:16	312:21,24

<b>Yudelson...</b> 3:18	90:17,17 <b>10:00</b> 187:15 <b>10:06</b> 244:1 <b>10:11</b> 187:15 298:4 <b>10:29</b> 252:6 <b>10:36</b> 244:11 244:20 <b>10:49</b> 55:25 <b>100</b> 79:2 <b>10019-1601</b> 2:14 <b>10020</b> 2:5 <b>109</b> 3:12 <b>10th</b> 2:4 67:25 <b>11</b> 54:3 244:19 257:14 <b>11:00</b> 191:7 191:11 <b>11:01</b> 55:25 <b>11A</b> 3:20 220:10 238:3 <b>12</b> 3:16,21 152:6,16 154:21 175:11 235:11 258:13 261:14 <b>12/10/20</b> 4:8 <b>12:11</b> 152:8 <b>12:30</b> 111:12 <b>12:33</b> 109:20 <b>12:55</b> 298:9 298:19 <b>12th</b> 68:2 <b>13</b> 3:22 68:7 68:15,24 152:7,16 221:13 222:1 238:6 257:13 308:21,22 <b>13th</b> 69:2 <b>14</b> 3:16,23 61:25 64:1	64:5 81:19 106:12 143:19 152:6 220:15 241:8 260:15,24 <b>147</b> 124:22 124:24 131:7 136:19,20 136:23 195:11,13 195:14,23 196:6 198:4 201:15 202:12,21 204:7 296:8 <b>14th</b> 312:19 <b>15</b> 3:24 195:6 293:18 295:2 <b>150</b> 3:14 <b>152</b> 3:15 <b>159</b> 307:14 307:25 <b>16</b> 3:25 31:4 68:20,24 71:9,20 204:24 205:13 213:6 233:12 300:7 303:9 <b>160</b> 307:14 <b>163</b> 307:14 <b>16th</b> 69:2,13 69:23 <b>17</b> 4:3 30:13 82:23 91:16 214:22 241:22 294:24 <b>18</b> 4:4 131:24	222:15 231:22 235:11 260:24 <b>187</b> 4:12 <b>19</b> 4:5 197:14 200:8 <b>195</b> 3:17 <b>198</b> 131:24 <hr/> <b>2</b> <hr/> <b>2</b> 3:10 102:1 103:25 104:9,12 104:13,14 104:18 167:20 168:5 169:22 173:21 174:1,4 178:2 180:4,5,7 181:8,18 187:16 190:11 191:4,11 192:9 193:4 194:23 195:4,6 197:18 199:22 200:12 202:21 203:23 207:17 208:24 209:23 210:1,11 210:20 211:11 212:18 213:1 219:2 220:14 235:21 236:2 293:21	297:22 306:1,1 <b>2:00</b> 184:20 <b>2:04</b> 146:1 <b>2:06</b> 296:15 <b>2:35</b> 237:10 <b>20</b> 4:6 20:3 57:25 213:8 273:14 292:23 299:23 <b>2012</b> 71:24 <b>2017</b> 57:22 61:20 <b>2020</b> 1:5,16 7:18 31:4 35:24 37:22 39:8 43:9 50:18 54:3 56:4 57:18 58:13 61:9 61:13,17 61:20 62:6 62:21 67:18 69:10 74:19 84:9 84:10 90:24 103:5,25 109:12 132:14 146:4,5 167:20,21 168:4 251:15 253:10,19 309:22 <b>2021</b> 316:21 <b>21</b> 1:16 4:8 30:11 131:21 236:20 258:12 <b>212.468....</b> 2:14 <b>212.763....</b> 2:5
----------------------------	--	---	--	--

<b>22</b> 4:9	187:1	316:20	200:7	<b>5:30</b> 62:10
223:24	188:6		210:3	<b>5:34</b> 63:1
260:15	298:3	<u>4</u>	217:5, 6, 9	<b>54</b> 3:9
<b>220</b> 3:20	<b>250</b> 2:13	<b>4</b> 3:12 48:15	217:10	<b>55th</b> 2:13
<b>23</b> 1:5 7:18	<b>257</b> 3:22	61:9 71:2	223:16	<b>57</b> 3:11
8:1 16:21	<b>26</b> 103:17	71:7, 14, 24	224:22	<b>5th</b> 260:7
18:10 20:3	<b>27</b> 77:7 84:9	72:3 78:8	225:10	298:14
28:24	<b>293</b> 3:24	79:6, 17	231:7, 7, 12	<u>6</u>
33:23	<b>294</b> 4:3	81:23	232:16, 24	<b>6</b> 3:14 57:18
35:23 39:8	<b>299</b> 4:6	82:21, 22	233:1	61:13
114:15	<b>2nd</b> 188:22	83:18 84:3	234:10	150:23
115:24	196:17	84:9 86:12	238:13	151:2, 3
206:5	<u>3</u>	91:8, 12, 15	241:23	152:3, 17
217:4	<b>3</b> 3:11 57:16	91:21 92:1	245:5	153:21
231:18	83:3, 25	92:8, 12	251:15	157:19
232:1, 11	219:11	103:4	298:9	160:22
240:13	220:13	104:11, 25	300:12	163:10
261:13	221:13, 25	105:22	305:4	167:14
285:6	222:15	107:6, 15	306:2	182:1, 2
286:5, 19	223:24	108:2	311:8, 14	233:12
290:15	225:25	109:11, 14	311:25	242:14, 21
296:12	227:19	109:19, 20	312:11	256:21
<b>237</b> 3:18	230:2, 9	117:5	<b>417</b> 4:7	312:13
<b>23R</b> 4:10	232:9	119:8	300:3	<b>6:10</b> 62:10
43:1	238:4	120:16	<b>419</b> 300:11	62:11
186:22	239:19	121:1, 10	<b>422</b> 300:24	<b>6:33</b> 308:12
189:17	241:8	130:2	<b>424</b> 4:7	<b>6:38</b> 308:12
243:16	243:18	131:18	300:3	<b>6:49</b> 315:12
308:19	244:20	132:22	<b>43</b> 4:10	<b>600</b> 2:4
312:6	251:14, 17	136:11	<b>47</b> 201:14	<b>61</b> 3:23
<b>23rd</b> 18:23	252:6	137:16	<b>48</b> 162:17	<b>6116</b> 190:5
20:5, 10	295:2	138:18	<b>48-hour</b>	<b>63</b> 307:25
29:1 30:1	<b>3/31/20</b> 4:10	139:2, 18	162:24	<u>7</u>
35:9, 17	<b>3:00</b> 184:20	139:24	<b>4th</b> 72:5	<b>7</b> 3:15 33:21
36:4, 14, 19	<b>30</b> 4:8 57:25	140:19	111:13	48:3 64:4
36:24	107:2	144:19	160:3	64:13
37:25	250:11	146:4, 5, 14	252:10	151:3
39:22 40:7	311:14	150:15	298:10, 14	152:5, 5
42:1, 22	<b>31</b> 43:8	153:23	298:18	153:6
44:6	47:10, 25	165:21	299:11	156:19
114:20	48:9	167:20	<u>5</u>	164:13
115:17	<b>31st</b> 42:22	168:3	<b>5</b> 3:3, 13	167:2
232:18	44:6	169:22	181:25	204:19
301:9	<b>38</b> 60:2 73:8	170:20	232:25	205:12
<b>24</b> 4:11	74:22	174:4	238:7	206:5
162:12, 17	<b>39</b> 60:4	176:16	<b>5/11/20</b> 3:9	234:19
225:4	<b>3rd</b> 231:7	177:3	<b>5:03</b> 256:5	264:7
242:14, 21	237:10	179:7	<b>5:04</b> 256:18	267:13
<b>25</b> 4:12	239:14	181:8, 17	<b>5:10</b> 256:18	
103:5		196:19, 20		

285:13	<b>9:35</b> 193:4			
309:21	312:21			
<b>7/6/20</b> 3:11	<b>9:36</b> 194:19			
<b>7:13</b> 308:21	<b>9:47</b> 243:24			
309:2	<b>911</b> 31:22			
311:3	59:8, 8, 19			
<b>7:27</b> 298:10	59:20			
298:19	60:16, 23			
310:12	61:1 74:1			
311:2	232:1			
<b>7:28</b> 312:8				
<b>7:30</b> 309:3				
<b>7th</b> 262:7				
286:15, 25				
288:10, 20				
292:11				
<hr/> <b>8</b> <hr/>				
<b>8</b> 3:17 62:6				
151:7				
195:1				
204:16, 20				
207:22				
293:20				
<b>8/4/20</b> 3:12				
3:14				
<b>8:20</b> 43:9				
<b>82</b> 3:19				
<hr/> <b>9</b> <hr/>				
<b>9</b> 3:18 151:8				
213:7				
237:7				
295:1				
296:14				
<b>9/16/20</b> 4:6				
<b>9/2/20</b> 3:17				
4:12				
<b>9/3/20</b> 3:18				
3:19, 20				
<b>9/6/20</b> 3:22				
<b>9/8/20</b> 3:23				
3:24				
<b>9/9/20</b> 4:3				
<b>9:26</b> 192:9				
<b>9:26:39</b>				
191:5				
<b>9:33</b> 1:17				
<b>9:34</b> 191:19				
191:19				