

DISTRICT OF COLUMBIA

+ + + + +

ALCOHOLIC BEVERAGE REGULATION  
ADMINISTRATION BOARD

----- :  
 IN THE MATTER OF: :  
 :  
 MPAC, LLC, t/a The Scene : Summary  
 2221 Adams Place NE : Suspension  
 License #78642 : Hearing  
 Retailer CX :  
 Chief of Police Closure :  
 May 17, 2014 :  
 :  
 Case # 14-251-00133 :  
 ----- :

Wednesday,  
May 28, 2014

ABRA Hearing Room  
Reeves Building  
2000 14th Street N.W.  
Washington, D.C. 20002

The above-entitled matter convened  
at 9:43 a.m., before the District of Columbia  
Alcoholic Beverage Regulation Administration  
Board.

BEFORE:

- RUTHANNE MILLER, Chairperson
- NICK ALBERTI, Member
- DONALD BROOKS, Member
- HERMAN JONES, Member
- HECTOR RODRIGUEZ, Member
- JAMES SHORT, Member
- MIKE SILVERSTEIN, Member

CONTENTS

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
Carl Harris	5	49	76	84
Cornell Jones	89	136		
Willie Blakeney	159	308	396	400

ITEM	PAGE
Closing statement by Mr. Adams . . . . .	407
Closing statement by Mr. LeFande . . . . .	434
Rebuttal Argument by Mr. Adams . . . . .	448

EXHIBIT	RECD
A. . . . .	214
B. . . . .	216
C. . . . .	220
D. . . . .	224
E. . . . .	227
F. . . . .	229
G. . . . .	231
H. . . . .	233
I. . . . .	238
J. . . . .	244
K. . . . .	247
L. . . . .	252
M. . . . .	253
N,O,P. . . . .	260
Q,R. . . . .	263
T,U,V. . . . .	267
W,X,Y. . . . .	272
Z,AA,BB. . . . .	275
CC . . . . .	276
DD . . . . .	301

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

P-R-O-C-E-E-D-I-N-G-S

11:17 a.m.

CHAIRPERSON MILLER: I'm going to now call The Scene. This is a Summary Suspension Hearing continuation, Case Number 14-251-00133. The Scene located at 2221 Adams Place NE, License Number 78642, and ANC-5C.

So, if the parties would identify themselves for the record.

MR. ADAMS: Good morning, Madam Chairman and Members of the Board, Walter Adams representing the District of Columbia. Along with me at counsel's table is Kawan Sankar who is my co-counsel for the matter.

CHAIRPERSON MILLER: Okay.

MR. LeFANDE: Good morning, Madam Chair, Matthew LeFande, a member of the District of Columbia bar for and on behalf of MPAC, LLC, the Respondent in this matter trading as The Scene.

Present with me today is Emanuel Mpras, co-counsel and Willie Blakeney for the

1 establishment.

2 CHAIRPERSON MILLER: Okay. Great.

3 So, hope you all had a nice  
4 weekend.

5 MR. LeFANDE: Thank you very much.

6 CHAIRPERSON MILLER: And if I recall  
7 where we left off was that the Government had  
8 completed its case and we were now going to  
9 hear from the licensee.

10 MR. LeFANDE: The Respondent calls  
11 Carl Edward Harris as his first witness.

12 CHAIRPERSON MILLER: Okay. And may  
13 I just ask you again how many witnesses you  
14 intend to call?

15 MR. LeFANDE: We have three  
16 witnesses today?

17 CHAIRPERSON MILLER: Two?

18 MR. LeFANDE: Three.

19 CHAIRPERSON MILLER: Three. Okay.

20 WHEREUPON,

21 CARL EDWARD HARRIS

22 was called as a witness by Counsel for the

1 Respondent, and after having been duly sworn,  
2 was examined and testified as follows:

3 DIRECT EXAMINATION

4 BY MR. LeFANDE

5 Q Good morning, sir. Could you  
6 please state your full name for the record?

7 A My name is Carl Edward Harris.

8 Q And are you a resident of the  
9 District of Columbia?

10 A Yes.

11 Q And how are you so currently  
12 employed?

13 A I do security.

14 Q And where do you do security?

15 A I do security at The Scene, Macombo  
16 Lounge, Redline.

17 Q When you refer to the first place  
18 you indicated, The Scene, is that, in fact,  
19 the establishment which is the subject matter  
20 of this hearing today?

21 A Yes, sir.

22 Q Okay. And how long have you been

1 employed to work security at The Scene?

2 A Roughly going on four years.

3 Q Okay. Do you have any formal  
4 training in security procedures or do you have  
5 any certifications with regards to working  
6 security?

7 A Yes, sir.

8 Q And what would those be please?

9 A I have my own security company and  
10 also have my SO license.

11 Q And just for the benefit of those  
12 members of the Board who may not be familiar  
13 with that acronym, what do you mean by  
14 referring to an SO license?

15 A A Security Office.

16 Q And who has provided that license  
17 to you?

18 A SOMB and DCRA.

19 Q And, again, for the benefit of  
20 those folks here who may not be familiar with  
21 those acronyms could you just spell those out  
22 for us. SOMB means and what does DCRA means.

1           A       Security Office and Management  
2           Branch and Department of Regulatory Affairs.

3           Q       Very good, sir. And as a predicate  
4           to receiving that license did you undergo any  
5           particular kinds of training or screening?

6           A       Yes, sir.

7           Q       And what kind of training did you  
8           do, sir?

9           A       Training from officer safety,  
10          conflict resolution, customer relation,  
11          uniform equipment training, first aid, writing  
12          reports, etcetera.

13          Q       And this training was necessary for  
14          you to receive the Security Officer's license  
15          from the Security Officer's Management Branch?

16          A       Yes, sir.

17          Q       Okay. And such was sufficient so  
18          they issued you that license?

19          A       Yes, sir.

20          Q       Very good. Turning your attention  
21          to the morning of May 17th of this year were  
22          you working?

1           A       Yes, sir.

2           Q       And where you working, sir?

3           A       In the front entryway of The Scene  
4 nightclub.

5           Q       Very good, sir. And what was your  
6 assignment at the front entry of The Scene  
7 nightclub?

8           A       I check I.D.'s and controlled  
9 entry, patrons entering in and also patrons  
10 entering out.

11          Q       And if you could just simply  
12 clarify. There appears to be an alleyway  
13 that's fenced in on the prior exhibits that  
14 were offered by the Government. Could you  
15 just in relation to this alleyway and in  
16 relations to Adams Place could you just  
17 describe for me where this front entryway  
18 would be?

19          A       The front entry is like -- it's --

20          Q       Is the front entryway closer to  
21 Adams Place or is it closer to the front door  
22 of the establishment?

1           A       The front entryway is close to  
2 Adams Place.

3           Q       So, does it front onto Adams Place?

4           A       Yes, sir.

5           Q       Okay. So, this is the part of the  
6 establishment that's closest to Adams Place is  
7 what you're saying?

8           A       Yes, Adam -- because Adams is like  
9 a one-way down.

10          Q       Okay. And would this be then the  
11 first place that customers would encounter  
12 personnel from the establishment?

13          A       Yes, sir.

14          Q       Okay. Calling your attention to  
15 the early morning hours of May 17th do you  
16 recall any incidents that required your  
17 attention in terms of security at the  
18 establishment?

19          A       Yes, sir. First and foremost if  
20 anyone exit out the club they have to come  
21 past me. And it was one incident where it was  
22 a young guy wearing white shirt, white pants,

1 had dreads, he was escorted out by one of the  
2 security that was inside. And I must say he  
3 done for the night. So, when they always  
4 bring somebody out they let me know what the  
5 situation with that person is. So, when he  
6 brought the person out said the person was  
7 done, you know, I just told him to go out, go  
8 in the street, whatever, but the person would  
9 then cause no problem. I mean, he just stood  
10 out in the front. He said he was done for the  
11 night so that was it. So, I don't know if he  
12 waited for a ride or anything but he just  
13 stood out in the front.

14 Q So, if I understand your testimony  
15 then at some point, do you remember what time  
16 this was?

17 A That was a little bit after 1:00.

18 Q Okay. So, sometime after 1:00 a.m.  
19 on the morning of May 17th some other  
20 personnel from the establishment escorted a  
21 man with a white shirt and dreads through your  
22 front entrance?

1           A       Yes, sir.

2           Q       And the person who escorted him out  
3 spoke to you at this point?

4           A       The person they escorted out?

5           Q       The person who was escorting the  
6 man in the white shirt and dreads?

7           A       Okay.

8           Q       The security person did they say to  
9 you?

10          A       Yes, sir.

11          Q       And what did they say to you?

12          A       Say he was done for the night.

13          Q       Okay. Did you have an opportunity  
14 to observe the man in the white shirt and the  
15 dreads?

16          A       Yes, sir.

17          Q       And what was his demeanor at the  
18 time that you observed him?

19          A       He was calm, cool, collect. He  
20 just got thrown out.

21          Q       Did you speak to him?

22          A       No, sir.

1 Q Okay. Were you able to observe his  
2 person clearly?

3 A Yes, sir.

4 Q He was in close proximity to you?

5 A Yes, sir.

6 Q Did he appear agitated at all?

7 A No.

8 Q Did he appear combative at all?

9 A No.

10 Q Did he appear to be injured in any  
11 way?

12 A No.

13 Q He wasn't bleeding?

14 A No.

15 Q He wasn't guarding any particular  
16 part of his body?

17 A No.

18 Q He wasn't limping?

19 A No.

20 Q Okay. At anytime did he ask you to  
21 call the police?

22 A No.

1           Q       Okay.  At anytime did he ask you  
2       for an ambulance?

3           A       No.

4           Q       Okay.  Did there come a time that  
5       any other person asked you to call the police  
6       about this person?

7           A       No.

8           Q       Okay.  Was there anything about his  
9       actions in standing near the front entrance  
10      that would have given you reason to call the  
11      police?

12          A       No.

13          Q       And how long did he remain near the  
14      front entrance?

15          A       Pretty much all the way to closing  
16      like he stayed there for a minute.

17          Q       Okay.  And while he was standing  
18      there was he on Adams Place or was he on the  
19      sidewalk?  Where do you recall him standing?

20          A       He was pretty much on Adams Place  
21      because, you know, Adams come down like this  
22      so at the front end through the club he was

1 just -- just standing on Adams -- Adams  
2 Street.

3 Q He was standing in the street on  
4 Adams?

5 A Really the sidewalk was so big.

6 Q Okay.

7 A So, he sidewalk to the street and  
8 he was just standing there.

9 Q Was he obstructing traffic?

10 A No.

11 Q Was he presenting a danger to  
12 himself or any other people that you could  
13 see?

14 A No.

15 Q Okay. Was there a time when he  
16 left?

17 A No.

18 Q I mean, at some point did he leave  
19 and go home? He's not standing there -- we  
20 don't think he's standing there today is he?

21 A Other than when later on he just  
22 left when other people was coming out but

1 other than that he never left.

2 Q So, when other people were coming  
3 out he left. Did he join other people at that  
4 time?

5 A Yes, sir.

6 Q Okay. Did he have an argument with  
7 any of the people that he joined?

8 A No.

9 Q How was his demeanor towards those  
10 other people when he joined them?

11 A He just walked with them.

12 Q Was he speaking with them?

13 A Yes.

14 Q Okay. Did it appear to be a  
15 friendly tone or adversarial tone?

16 A It was pretty much like he was  
17 waiting for somebody and everybody just  
18 walking on together.

19 Q So, he was actually at the club and  
20 for sometime after that he appeared to have  
21 been waiting for somebody, is that your  
22 testimony?

1           A       Yes.

2           Q       Okay. Very good. And at no time  
3 he caused any trouble whatsoever?

4           A       No.

5           Q       Very good. Drawing your attention  
6 to slightly later after the man in the white  
7 shirt and the dreads was asked to leave the  
8 establishment was there -- what do you recall  
9 other than the man standing there, what  
10 happened next?

11          A       Normally we do a one way -- one way  
12 means people come into the club. At 2:45 we  
13 cut it off. But just that night the owner  
14 indicated a 2:30 cut off. So that means at  
15 2:30 nobody else coming in. So, we was just  
16 gathering up the cones and stuff, taking the  
17 cones up and

18          Q       We'll get to that in just a second.  
19                    So, at approximately, if I  
20 understand your testimony, approximately 2:30  
21 the owner of the establishment approached you  
22 and he said to you one way.

1           A       One way.

2           Q       So, those were the words you used.  
3       And I understand your testimony to mean that  
4       nobody else was allowed into the club at this  
5       point but people were allowed to leave, is  
6       that what --

7           A       That's correct.

8           Q       -- your testimony? I'm sorry,  
9       it's just that the hand gestures that you make  
10      don't transcribe so I may ask you just to  
11      reiterate some of the things that you said --

12          A       Okay.

13          Q       -- so that we make a good record  
14      of these things.

15                   And this was your responsibility at  
16      this time to prevent more patrons from coming  
17      into the club but permitting the others to  
18      leave?

19          A       Yes, sir.

20          Q       Okay. Very good.

21                   And how did that go?

22          A       It was no problem. He has -- a

1 couple of other patrons come up and they  
2 wanted to come in and I told them it's one  
3 way.

4 Q So, these folks are coming from  
5 Adams Place then trying to enter the  
6 establishment?

7 A Yes, sir.

8 Q Okay. And what happened?

9 A And I told him we not allowing  
10 nobody else in.

11 Q Okay.

12 A So, they -- well, it ain't 2:30.  
13 Hey, one way is one way.

14 Q So, they were upset that you would  
15 actually not letting people in?

16 A They wasn't so much upset. It was  
17 pretty much trying to talk their way to get  
18 in.

19 Q Okay. Were they argumentative with  
20 you?

21 A No.

22 Q Okay. Were they calm?

1           A       Yes, you know, kind of wanted to  
2       come in but --

3           A       Did you feel threatened by them?

4           A       No.

5           Q       Did they make any gestures towards  
6       you of any sort?

7           A       No.

8           Q       Okay. They were cool?

9           A       Yes, sir.

10          Q       Okay. What happened after that?

11          A       So, they just stayed out front  
12       still, you know, one of them was pretty much  
13       still trying to like talk his way in but I  
14       just didn't give it no thought.

15          Q       Because they were trying to talk  
16       their way in was there any reason that you saw  
17       a need to call the police?

18          A       No.

19          Q       Okay. Based on what they were  
20       doing?

21          A       Right.

22          Q       And what happened after that?

1           A        So, during that time where we had  
2       the front secure I start hearing like a ruckus  
3       in the back, a ruckus in the back pretty like  
4       voices arguing and so I looked back. It was  
5       like two -- two gentlemen at the front entry  
6       of the club because the club sits in the -- in  
7       the cut of a driveway all the way down at the  
8       end. And seeing two security officers, two  
9       security bringing people down the steps. And  
10      when I notice that then I start seeing more  
11      people coming out and I start seeing more  
12      security coming out. And it was more like  
13      people arguing. It wasn't no pushing or  
14      anything. I just seen the security just  
15      trying to calm people down. And at that  
16      point when the security start walking two  
17      gentlemen and the girls -- it was girls and  
18      guys walking them down. They start walking  
19      down. They start arguing a little bit and the  
20      next minute they just calmed down. They all  
21      start coming out of the gate. And it was just  
22      one guy coming from I don't know. One guy

1 coming from that area where everybody else  
2 coming from and he just -- just ran it out the  
3 gate. Just ran out the gate.

4 Q So, while the security folks were  
5 escorting the group outside, there was a  
6 different person who ran past them, is that if  
7 I'm understanding what you're saying?

8 A Yes, yes.

9 Q And he ran outside the gate?

10 A Yes, he just ran outside the gate  
11 on Adams and just ran up Adams. And it was a  
12 girl --

13 Q Was anyone chasing him?

14 A It was a female.

15 Q A girl was chasing the man?

16 A Yes.

17 Q Okay. Was anything being said  
18 between them?

19 A No. No. He just like -- he just  
20 -- just ran. I didn't see no security.  
21 Security didn't say nothing like that guy or  
22 anything like that. He's just like the group

1 was walking down with security and then  
2 somebody just breaking -- just run.

3 Q So, the woman and the man, the  
4 woman chasing the man did either of them  
5 appear to be injured?

6 A No. No.

7 Q Okay. Did either of them appear to  
8 be threatening the other one?

9 A No. No.

10 Q Did either of them say anything  
11 that you could discern?

12 A No, other than just seeing the  
13 gentleman running. When I seen him running and  
14 I'm -- because I was looking at the -- I was  
15 paying -- really, I was paying attention to  
16 the security and the people they was asking  
17 dealing with.

18 Q Okay. We'll get to that in just a  
19 second. But was there anything about the man  
20 being chased by the woman that gave you reason  
21 to believe that you should call the police?

22 A No. No.

1           Q       Okay. Now, turning our attention  
2 back to the group of people, what was going on  
3 with them, once the man and the woman had  
4 passed by you at the gate.

5           A       Like I say, security is bringing  
6 them down. Then the ones -- the patrons that  
7 we have in front of the gate they became more  
8 attentive like they was about to run into the  
9 gate. And me and the other person that was  
10 working in the front with me  
11 stopped. You can't come in this gate. So,  
12 they just stood looking like -- just looking.

13          Q       So, these are the two people that  
14 were waiting earlier trying to come in?

15          A       It was a guy and the white and it  
16 was like three other people they came. They  
17 wanted to get in and they couldn't get it.  
18 So, they just stood in front.

19          Q       Was there attention directed  
20 towards the argument that was going on inside  
21 the gate?

22          A       Yes, they were just -- just

1 looking.

2 Q But did that appear to be what they  
3 were interested in?

4 A From my experience to somewhat, you  
5 know, because --

6 Q Were the persons outside the gate  
7 trying to come in were they at this point in  
8 close proximity to the group?

9 A I'd say roughly about 30 feet.

10 Q Okay. Did you hear any words  
11 exchanged between them?

12 A No, there were no words.

13 Q Okay. Did you see any threatening  
14 gestures made between them?

15 A No, no.

16 Q Was there anything at this point  
17 that made you concerned enough that you  
18 thought you should call the police department?

19 A No.

20 Q What happened next with the group  
21 as they were coming towards you?

22 A When security got the group outside

1 the gate they all of them just mingled  
2 together and then just they started walking.  
3 They just -- they just started walking up  
4 towards Adams Street towards -- towards the  
5 railroad tracks. They just started walking.

6 Q So, the group that was trying to  
7 come in and was interested -- attentive as to  
8 what was going on inside met the group that  
9 was coming out the gate they joined up  
10 together is that what you're saying?

11 A I don't know who all joined who but  
12 I know the guy with the white he just walked  
13 -- he just walked with them because like I say  
14 it was covering other people but I was just  
15 focusing on more of the crowd itself that was  
16 coming out the gate.

17 Q So, the man in the white did he  
18 begin arguing with those people?

19 A No. No.

20 Q Did he make any gestures towards  
21 any of those people?

22 A No.

1           Q       How close was he in proximity to  
2           the people once he joined the group? How  
3           close was he in proximity to the other  
4           members of the group?

5           A       Probably less than five feet.

6           Q       Did he appear to -- he didn't  
7           appear hostile to anyone in the group?

8           A       No.

9           Q       He was just simply walking away  
10          from them?

11          A       Yes, sir.

12          Q       And at this point did you see any  
13          reason to call the police?

14          A       No.

15          Q       Okay. Did any part of that group  
16          that you saw as they left did you have a  
17          chance to observe them as they were exiting?

18          A       When they started just walking --  
19          just walking on up, inside the driveway that  
20          leads to the front entry of the club people  
21          just standing there and I went up start  
22          telling people, no, you got to keep -- you got

1 to keep on walking, keep on walking. No  
2 lingering right here because between the gate  
3 and the club is vehicles so basically just  
4 wanted the pathway just cleared.

5 Q And how close were you to the gate?

6 A Like two car lengths.

7 Q You were two car lengths away from  
8 the gate?

9 A Because there's vehicles inside the  
10 gate.

11 Q And how narrow is that area where  
12 the vehicles are?

13 A It's narrow to the point where if  
14 you got a vehicle parked on the left and a  
15 vehicle parked on the right you only can get  
16 one more car up in that area.

17 Q Would you say about eight feet  
18 width?

19 A Yes, pretty much. Pretty much.

20 Q So, for someone to walk past you if  
21 you're standing in that area they would have  
22 been within a few feet of you at any point as

1 they walked past?

2 A If they walked past?

3 Q On the street towards the gate?  
4 They would have had to have come within a few  
5 feet of you, is that correct?

6 A Yes, sir.

7 Q So, you had an opportunity -- was  
8 this area well lit? Was this area lighted?  
9 Could you see well in there or was it dark?

10 A Yes. Yes.

11 Q Okay. So, you had an opportunity  
12 then to observe pretty much all of these  
13 people as they walked past you?

14 A Yes.

15 Q Okay. So, out of this whole group  
16 did you see any persons who were being  
17 combative, they were fighting with anyone  
18 else?

19 MR. ADAMS: Objection, leading.

20 A No, I didn't see nobody combative  
21 like I stated.

22 MR. LeFANDE: Wait, wait, wait. The

1 Attorney General has made an objection to the  
2 form of the question that I've asked and  
3 before you're allowed to answer it the  
4 Chairwoman has to decide as to what -- so,  
5 we're going to have a little discussion about  
6 that right now and you have to wait until  
7 that's finished and she instructs you what to  
8 do next. Okay?

9 CHAIRPERSON MILLER: Thank you.  
10 Okay.

11 MR. ADAMS: Objection, the question  
12 was leading.

13 CHAIRPERSON MILLER: Okay.

14 MR. LeFANDE: I'll restate the  
15 question.

16 CHAIRPERSON MILLER: Okay.

17 Q Okay.

18 As to the persons who were walking  
19 past you when they were in close proximity  
20 between the cars what was their demeanor?

21 CHAIRPERSON MILLER: You can answer  
22 the question.

1           A       They was more like people just  
2           arguing to a point but it wasn't no -- it was  
3           just like arguing and security just calming  
4           them down. That was it.

5           Q       Okay. At this point did you see  
6           any people fighting?

7           A       No.

8           Q       Okay. Did you see any persons that  
9           were injured among that group?

10          A       No.

11          Q       Okay. Did you see anyone making  
12          any threatening gestures towards other  
13          members of the group?

14          A       No.

15          Q       At this point did you see any  
16          reason that you thought it was necessary to  
17          call the police with regards to the conduct of  
18          this group?

19          A       No.

20          Q       Okay. What happened next?

21          A       So, once everybody leaving out and  
22          they get up the street one of the security

1 alone the gentleman that was in front of them  
2 they just pretty much just standing -- pretty  
3 much like on Adams Street in front of the  
4 entryway of the gate but a little bit further  
5 from the gate and was just watching the crowd  
6 go up the street. So, I'm at the edge of the  
7 gate just monitoring the walkway. So, the  
8 next minute started getting some shooting.

9 Q And in what direction did you hear  
10 the shooting coming from?

11 A Like I say Adams Street is a one  
12 way street so it was pretty much coming up in  
13 the area by where the Stadium and our club.

14 Q Would you say that was in the  
15 direction of Queens Chapel Road?

16 A Yes, sir. Yes, sir, that would be  
17 right, yes, sir.

18 Q Did you see specifically where the  
19 shooting was coming from from where you were  
20 standing?

21 A No.

22 Q Okay. You did not see a shooter?

1           A       No.

2           Q       You didn't see muzzle flashes, any  
3 flashes of light from the gun?

4           A       No.

5           Q       What happened then?

6           A       The crowd that was let loose early  
7 that pretty much was walking out when you had  
8 people also still coming out the club, leaving  
9 out the club. The crowd started running back  
10 down the street. And --

11          Q       Away from Queens Chapel or towards  
12 Queens Chapel?

13          A       Away from Queens Chapel. Back down  
14 towards The Scene nightclub. And you had a  
15 group of people just coming out so last I  
16 hearing the gunshot I kept the group that's  
17 coming out inside the gate and the group that  
18 was running --

19          Q       Let's start with that.

20          A       Okay.

21          Q       You said you had a group that you  
22 kept from leaving the establishment.

1           A       Yes, sir.

2           Q       Is that correct? So, you blocked  
3 them -- how did you keep them from leaving?

4           A       Me and the other individual and  
5 there was also one security guy that still  
6 lingered behind that came from inside was  
7 outside too. So, it was basically three of  
8 us.

9           Q       And what did you do?

10          A       Stopped the patrons that was  
11 leaving out from going onto the street.

12          Q       And how did you do that?

13          A       By holding my arms out. Holding my  
14 arms out and blocking them in.

15          Q       So, you blocked them physically  
16 with your body, is that what I understand  
17 you're saying?

18          A       Yes, sir.

19          Q       Okay. And what was your purpose in  
20 preventing people leaving the establishment  
21 from going on out onto Adams Place?

22          A       Because of the gunshots. When they

1       come from a direction, I don't know where they  
2       come but from over Adams Street.

3               Q       But what was your reason for not  
4       letting the other people come out of the club  
5       on --

6               A       So, someone might get injured.

7               Q       So, you were trying to protect them  
8       --

9               A       Yes, sir.

10              Q       -- from being injured?

11              A       Yes.

12              Q       Okay. Very good.

13                      And as you're blocking the way of  
14       these people trying to leave the club and go  
15       out onto Adams Place, what happened then?

16              A       Then you had the group of people  
17       that was coming down trying to run back into  
18       the club.

19              Q       And what happened to them?

20              A       And we was blocking them and I was  
21       putting them on the side of the gate.

22              Q       And what was your reason for doing

1 that?

2 A For one, not -- when they running  
3 down, I don't want them to get hurt but also,  
4 two I don't know who's who's -- who involved  
5 with what.

6 Q Were you concerned at this point  
7 that one of those persons might have been the  
8 shooter?

9 A Yes, because I know it's coming  
10 from -- what area, but I don't know who is  
11 doing the shooting.

12 Q Okay. So, do I understand your  
13 testimony to say you were trying to protect  
14 the people inside from the shooter then?

15 A Yes, sir.

16 Q By not letting anyone else in?

17 A Right.

18 Q Okay. Thank you.

19 And what happens at this point?

20 A So, a lot of them they was  
21 complying and getting on the side of the gate  
22 and then you had this brown-skin, heavy set

1       guy, had dreads, he's running down the street.  
2       He's running down on the sidewalk off of Adams  
3       Street. And I noticed when he got to the  
4       entry of the gate, I noticed his leg was  
5       bleeding.

6               Q       Okay. Let's just back up just a  
7       moment.

8                        You said that the persons who were  
9       coming down Adams Place you would not let  
10      inside the gate. But you said they went to  
11      the side of the gate?

12              A       Yes.

13              Q       What do you mean by that?

14              A       The gate is pretty much like I'd  
15      say -- with the gate open you got like three  
16      -- three feet by three feet on both ends but  
17      if the gate closed you probably got like 12  
18      feet for the gate at the front.

19              Q       So, where were these people going?

20              A       They was on the side because you  
21      got steps right there too.

22              Q       Okay.

1           A        It was on the side of the building  
2           which is a building and a gate. They was on  
3           the side there and on the side pretty much by  
4           -- between The Scene and the Metro access.

5           Q        So, the persons then that were  
6           coming down Adams Place away from this  
7           location of the shooting had some place --  
8           would they have some place to hide?

9           A        Yes, pretty much to duck from.

10          Q        Okay. And how many people were in  
11          that situation?

12          A        Just coming down Adams?

13          Q        Right.

14          A        I couldn't even count.

15          Q        Okay. Thank you.

16                    You said then that you observed a  
17          man coming down the sidewalk, heavy set,  
18          brown-skinned that appeared to be injured.

19          A        Yes, sir.

20          Q        Okay. And describe for us what  
21          happened then.

22          A        Like I say he was coming down. The

1 side that he was coming down on was on my side  
2 where I was standing and was by close to the  
3 steps. And when he come running down I  
4 noticed that his leg was bleeding.

5 Q When you say that he was coming  
6 down on your side, do you mean to say that he  
7 was on the side of Adams Place that the  
8 establishment is located on?

9 A The side -- the sidewalk.

10 Q Oh, the sidewalk on the side of the  
11 street --

12 A Where the club is at.

13 Q Thank you. Please continue.

14 A And when I seen that he got shot in  
15 the leg I told him to -- I told him to sit  
16 yourself on the steps. To sit on the steps  
17 and just calm down. So, at the time there was  
18 another security there which was the head  
19 security.

20 Q And his name?

21 A Cornell.

22 Q Cornell. Okay. What's Cornell's

1 full name?

2 A I don't know.

3 Q Okay. Go on.

4 A And I told Cornell, call the  
5 police. This person has been shot and Cornell  
6 say he going to call the police. So, when the  
7 person was there a couple of other individuals  
8 that was outside the gate, they ran down and  
9 -- ran down from Adams Street. Two of them  
10 knew the individual so the individual said  
11 come on tie my leg, tie my leg. So --

12 Q How much time elapsed between the  
13 time that you observed the injured brown-  
14 skinned heavy-set man on the establishment's  
15 side of the street sidewalk, how long between  
16 the time that you observed that he was injured  
17 and the time that you told Cornell to call the  
18 police? How much time elapsed?

19 A Probably it was probably less  
20 than -- less than a minute.

21 Q Less than a minute. Okay.

22 And then these other persons who

1 appeared to know the brown-skinned heavy-set  
2 man came up to him?

3 A Yes, sir.

4 Q Okay. And what happened then?

5 A And because at first I wouldn't let  
6 anybody even touch him but he knew -- he knew  
7 -- he knew these two individuals so, you know,  
8 I ain't interfere with that. So, and then one  
9 of the young guys took off his shirt and tied  
10 it on his leg. And at the time when he tied  
11 it on his leg probably -- probably less than  
12 a minute after that the owner came up there  
13 which is what --

14 Q The owner of what, sir?

15 A The Scene nightclub.

16 Q And who is?

17 A Willy.

18 Q Willy?

19 A Yes, sir.

20 Q Okay. So, Willy came up?

21 A Yes, sir.

22 Q Okay. Go on.

1           A       He asked him first aid stuff and he  
2 went to attend to the person's leg and I was  
3 right there helping him.

4           Q       Now, when you first observed Willy  
5 where was he?

6           A       He was -- he was coming -- well,  
7 when I first was there he was coming down the  
8 walkway from the club.

9           Q       He was coming down the walkway.

10          A       The walkway.

11          Q       So, he's inside the gate?

12          A       Yes, sir.

13          Q       Okay. And where did he go?

14          A       He went straight to the individual  
15 that was shot.

16          Q       Now, was this outside of the gate?  
17 That was outside of the gate at this time?

18          A       Yes, sir.

19          Q       Okay. Now, when Willy went towards  
20 the person with his medical kit was he going  
21 towards where the shooting was coming from or  
22 away from where the shooting was coming from?

1           A        At that moment he went towards  
2 where the individual was at.

3           Q        When he left out of the gate did he  
4 go towards where the shooting was going on --  
5 had happened or away from where the shooting  
6 had happened?

7           A        No, that was pretty much towards.

8           Q        Okay. So, he left out of the gate  
9 and where is everyone else going at this time?

10          A        Everybody just like --

11          Q        Are they going towards the shooting  
12 or away from the shooting?

13          A        No, everybody was away.

14          Q        Everybody else was going away from  
15 the shooting.

16          A        Right.

17          Q        But Willy is going which way?

18          A        In the direction towards.

19          Q        Towards the shooting?

20          A        The steps.

21          Q        Doing what?

22          A        To take care of the individual that

1 got shot.

2 Q And what did you do then?

3 A Start cutting his pants leg with  
4 the scissors and start cutting it. Asking him  
5 various questions, is you shot anywhere else,  
6 you know. Individual wanted to give him some  
7 water. He said, no, don't give him no water.  
8 No, and he started to attend to the wound.

9 Q Did Willy look like he knew what he  
10 was doing?

11 A Yes.

12 Q Okay. And then what happened?

13 A At that moment, they say it was  
14 another individual that was shot up the street  
15 so while he's attending to him then I seen a  
16 lieutenant -- a lieutenant -- Lieutenant  
17 brown-skinned bald head tall. He came down  
18 where we was at and right after the  
19 lieutenant, then the paramedics came and then  
20 Willy asked one of the paramedics for some  
21 more gauze -- gauze and stuff. And that's  
22 when after he did a couple of things with the

1 individual and the paramedics took over then  
2 Willy went up the street towards to see if  
3 anybody else, you know, was shot or needing  
4 assistance.

5 Q Now, at this point was he going  
6 towards where the shooting had come from or  
7 away from where the shooting had come from?

8 A He's going towards.

9 Q Again, up the street.

10 A Up the street.

11 Q Towards where the shooting had  
12 happened.

13 A Yes, sir.

14 Q And could you see him once he had  
15 gone up the street?

16 A Yes.

17 Q And what was he doing?

18 A He was walking up towards the  
19 street.

20 Q And did you see him do anything  
21 else at that point?

22 A No. No. Because I was inside

1       doing something else.

2               Q       You were inside doing something --

3               A       No, I ended up starting doing  
4 something else.

5               Q       Okay. What happened during this  
6 time with the people that you were physically  
7 blocking from going out of the gate?

8               A       Once the paramedics came and then  
9 the police officers came because it was like  
10 one -- one police officer came down and he  
11 asked us because it was me, JT and a female.  
12 And he asked when the officer came down, it  
13 was a short officer. He asked us where the  
14 owner was at and I pointed and said he's going  
15 up the street.

16              Q       The owner of?

17              A       The club, the nightclub. The Scene  
18 nightclub.

19              Q       The Scene nightclub. Okay. And  
20 you pointed to where Willy was?

21              A       Yes, sir.

22              Q       Okay. And what did the officer do

1 then?

2 A He started making his way up there  
3 where he was at.

4 Q Okay. And what did you do at this  
5 time?

6 A At that time I stood right down  
7 there and just -- just -- just waited.

8 Q Stood

9 A Right in front of the gate. Right  
10 in front.

11 Q You remained at the gate?

12 A Yes, sir.

13 Q And were any people trying to leave  
14 the establishment at this time?

15 A At that time when the officer came  
16 down and previously when the lieutenant was  
17 down, people was just coming out the gate  
18 after that.

19 Q Okay. And you were letting them  
20 out?

21 A Yes, sir.

22 Q Okay. And was anyone trying to

1       come in?

2               A       No.

3               Q       Okay.

4               A       No.

5               Q       Okay.  And what happened after  
6       that?

7               A       It was -- it was like, you know, it  
8       was kind of chaotic, you know.  It was just,  
9       you know --

10              Q       When you say chaotic do you mean  
11       inside the establishment?

12              A       No, no.

13              Q       Inside the gate?

14              A       On Adams Street.

15              Q       Out on Adams Street it was chaotic?

16              A       Yes, sir.

17              Q       Okay.  And what was your  
18       responsibility during this time at the gate?

19              A       My responsibility is just to make  
20       sure that if you don't work there you can't  
21       come in.

22              Q       And you continued to do that?

1           A       Yes, sir.

2           Q       For how long?

3           A       The club closed. It was way more  
4 than like 2:30. It was like 4:00.

5           Q       Until 4:00 you stood there at the  
6 gate?

7           A       Yes.

8           Q       Not letting anyone in. Okay.  
9                    You said you saw the one police  
10 lieutenant, the bald --

11          A       Tall, brown-skinned.

12          Q       And then you saw the short officer.  
13 Did any other policemen come up to you that  
14 night?

15          A       No.

16          Q       Has any policeman contacted you  
17 since that night?

18          A       No.

19          Q       And no detective has talked to you  
20 ever about this event?

21                   MR. ADAMS: Objection, leading.

22                   CHAIRPERSON MILLER: Sustained.

1 MR. LeFANDE: I'll withdraw the  
2 question.

3 Q And no one since then has contacted  
4 you from the police department?

5 A No.

6 MR. ADAMS: Objection, leading.

7 MR. LeFANDE: I think that's not a  
8 leading question because -- I'll rephrase the  
9 question.

10 Q Has anyone from the police  
11 department contacted you since that night  
12 about this incident?

13 A No.

14 MR. LeFANDE: I have no further  
15 questions.

16 CHAIRPERSON MILLER: Okay. Cross?

17 CROSS-EXAMINATION

18 MR. ADAMS: All right. So, thank  
19 you for your testimony, Mr. Harris.

20 Q In your testimony you stated that  
21 you've been working on security with  
22 establishments for awhile here in D.C.?

1           A       Yes, sir.

2           Q       So, the establishments that you  
3 worked for are The Scene, Redline and there's  
4 another one I didn't pick up.

5           A       Macombo.

6           Q       Which one?

7           A       Macombo.

8           Q       Is that on Georgia Avenue?

9           A       Yes, sir.

10          Q       Okay. Just curious. All right.  
11 But that's neither here nor there. So, in  
12 terms of your work at The Scene you've been  
13 working it for four years. And so from --  
14 sorry, you need to respond.

15          A       Going on four years.

16          Q       Going on four years. And so your  
17 responsibility normally is to stop people  
18 right at the front gate in terms of their IDs  
19 and, you know, whether or not they have  
20 weapons, is that pretty much your  
21 responsibility?

22          A       And also see if they're fit to come

1 in.

2 Q Okay.

3 A See if they're fit to come in.

4 Q All right. So, what do you mean by

5 --

6 CHAIRPERSON MILLER: Wait a minute.

7 We didn't hear that. Could you repeat that?

8 MR. HARRIS: See if they're fit to  
9 come in.

10 CHAIRPERSON MILLER: If they're fit  
11 to come in?

12 MR. HARRIS: Yes, being like if they  
13 drunk, you know, any type of narcotics, you  
14 know, where they can't comprehend then I won't  
15 let them in.

16 CHAIRPERSON MILLER: Okay. Thank  
17 you.

18 Q And so earlier in your testimony  
19 you stated that if someone exits the  
20 establishment essentially that that person has  
21 to pass by you.

22 Q Yes, sir.

1           Q       And obviously if someone come in  
2           you put your eyes on them. All right. So,  
3           early on your testimony you stated that -- you  
4           were talking about this incident that happened  
5           I guess in the 1:00 hour, you stated that  
6           someone was brought to you and it was said  
7           that that person was done.

8           A       Yes, sir.

9           Q       All right. And so done meaning in  
10          this case that if the person is done that  
11          means that they're not going to be re-allowed  
12          entry that night, correct?

13          A       Yes, sir.

14          Q       All right. So, in terms of based  
15          on your four years, is that the normal  
16          practice all the time in terms of how that's  
17          handled in terms of if someone is being led  
18          out of the establishment to -- for someone to  
19          indicate that person is done?

20          A       Yes, sir.

21          Q       So, that's kind of like the  
22          establishment's policy?

1           A       Excuse me?

2           Q       That's the establishment's policy?

3           A       Yes, so I got acknowledge that I  
4 know who they talking about so when they bring  
5 this person to me and say that person is done  
6 and I look at this person's face and then make  
7 sure okay. Okay. This person is done because  
8 sometime if I don't, they get back in line.

9           Q       Right.

10          A       And then re-enter back in.

11          Q       Now, in terms of the  
12 establishment's policies in handling patrons  
13 what are the policies? What are your  
14 establishment's policies for handling patrons?

15          Q       Now in terms of the establishment's  
16 policies in handling patrons, what are the  
17 policies? What are your establishment's  
18 policies for handling patrons?

19                   MR. LeFANDE: That's a very broad  
20 question. Can we try to narrow something down  
21 here? I mean, we're asking him now at this  
22 point to recite the entire security manual.

1 MR. ADAMS: Wait, wait, wait, wait.  
2 Actually, I didn't say that. And now the  
3 witness is on the stand, so I --

4 CHAIRPERSON MILLER: No, don't  
5 answer the question for him.

6 MR. ADAMS: Yes.

7 CHAIRPERSON MILLER: That's where it  
8 sounded like we were going, so I'm going to  
9 overrule the objection.

10 BY MR. ADAMS:

11 Q So, what are -- to your knowledge,  
12 what are the -- and where are the  
13 establishment -- sorry.

14 How have you learned of your  
15 establishment's security policies?

16 A Say that again?

17 Q How -- are there security policies  
18 for the establishment?

19 A Yes, sir.

20 Q And how have you learned of them?

21 A From what the head of security  
22 explained to me in doing my job, and also the

1 owner.

2 Q Okay. So if someone says that the  
3 establishment has a written security plan, are  
4 you saying that you haven't seen that?

5 A Like I say, my job is I.D. check  
6 because I really don't deal with the patrons  
7 and bringing them out at all.

8 Q Okay. All right. So, the bottom  
9 line is that your -- how you learned of the  
10 policies is from the owner, and that's Mr.  
11 Blakeney, or Willie.

12 A Right.

13 Q Will Blakeney and Cornell. Is that  
14 right?

15 A Right.

16 Q All right. Now, I want to just  
17 clarify the whole situation with the people  
18 who were let out at one o'clock. So prior to  
19 the incident involving the shooting, those  
20 people had left, they had left the front of  
21 the establishment by three o'clock. Is that  
22 correct?

1           A        You say individuals.  Only one.

2           Q        Okay, the one -- I apologize,  
3        you're correct.  The one person, he had left.  
4        Right?

5           A        No, he stayed out in front.

6           Q        So, he was there -- so, what you're  
7        saying is that he was there until three  
8        o'clock, or he -- three o'clock?

9           A        He was there until that group came  
10       out.

11          Q        Okay.  And as well as the two  
12       patrons, or two people who had attempted to  
13       come in.  Correct?

14          A        There's three.

15          Q        Three people.

16          A        Yes.

17          Q        And according to your testimony,  
18       the people who were outside the gates did not  
19       exchange any words with the people who had  
20       come out of the establishment.  Correct?

21          A        That's correct.

22          Q        Okay.  Now, Mr. LeFande, he asked

1       you a lot -- a series of questions about I  
2       guess the conditions of people, asking whether  
3       or not they were injured or if you had any  
4       reason to call the police. So, what -- and  
5       which you answered that you didn't have any  
6       reason to call the police, so you didn't note  
7       any injuries. Is that pretty much -- I'm  
8       accurately stating what's in the testimony,  
9       correct?

10           A       That's correct.

11           Q       All right. So, in terms of your  
12       knowledge, what is the protocol for calling  
13       the police?

14           A       When an individual gets escorted  
15       out the club and if they're in front of the  
16       club, you know, causing commotions, being  
17       disturbing, causing a problem not only to our  
18       security but also towards the patrons that are  
19       coming in, then I will notify the owner or  
20       Cornell, and then we will call the police, or  
21       sometimes I even call the police.

22           Q       Okay.

1           A        But that's the normal practice, but  
2           when a person just get escorted out the club  
3           and they just, you know, realize okay, I did  
4           something I had no business in there doing,  
5           and they just out there and causing no  
6           problem, and just behaving, I don't even worry  
7           about it.

8           Q        All right. At some point, you  
9           stated that you saw the crowd come out of the  
10          establishment and that there was an argument  
11          in the alleyway outside the establishment.  
12          Correct?

13          A        Yes, yes.

14          Q        Okay. And however, since you were  
15          at the entryway, you don't know -- you had no  
16          reason to know why the security had led them  
17          out or were calming those people down.  
18          Correct?

19          A        That's correct.

20          Q        So whatever happened would have  
21          happened inside, correct?

22          A        That's correct.

1           Q       And at that time prior to them  
2           passing you, no one had communicated to you  
3           anything about what may or may not have  
4           happened inside, correct?

5           A       That's correct.

6           Q       All right. So essentially, the  
7           personnel who were inside are people who sees  
8           -- who see what happened.

9           A       Yes, sir.

10          Q       Okay. And in terms -- now, in the  
11          four years that you've been there, it's safe  
12          to say that normally a detail of MPD officers  
13          are normally right outside the establishment,  
14          correct?

15          A       That's correct.

16          Q       So in certain instances, if there  
17          are issues with patrons, a person will be  
18          brought directly to an MPD officer or  
19          something if there's something of concern that  
20          occurred within the establishment. Is that  
21          correct?

22          A       If it be like a fight or something

1 that really draw attention, the security will  
2 bring them individuals right out to the gate  
3 and let MPD know about the problem, and also  
4 what they done done. So, yes.

5 MR. ADAMS: Okay. I have no further  
6 questions, sir.

7 CHAIRPERSON MILLER: Okay. I'm going  
8 to do Board questions --

9 MR. LeFANDE: Just one.

10 CHAIRPERSON MILLER: -- and then  
11 you'll get rebuttal. We do Board questions,  
12 then you'll get questions, and Board  
13 questions, and rebuttal. Are there Board  
14 questions? Yes, Mr. Short.

15 MR. SHORT: Good afternoon, Mr.  
16 Harris.

17 MR. HARRIS: Good afternoon, sir.

18 MR. SHORT: You -- there were a  
19 couple of statements that you made and I'm  
20 just trying to get clarification. You are a  
21 security officer registered with DCRA,  
22 Department of Consumer and Regulatory Affairs.

1 MR. HARRIS: Yes, sir.

2 MR. SHORT: I know there are armed  
3 and unarmed statuses.

4 MR. HARRIS: Yes, sir.

5 MR. SHORT: What is your status?

6 MR. HARRIS: I'm an SO Unarmed.

7 MR. SHORT: Unarmed. Are there any  
8 armed officers, security officers that work at  
9 The Scene?

10 MR. HARRIS: No, not that I know of.  
11 No.

12 MR. SHORT: Okay. All right. You  
13 also said when they brought the person to the  
14 front door that you described as was done for  
15 the day, done for the evening, done for the  
16 morning. And you said he was calm and cool and  
17 collected.

18 MR. HARRIS: Yes, sir.

19 MR. SHORT: And you also mentioned  
20 things became chaotic, so between calm and  
21 cool and collected, until it got chaotic, was  
22 this person still on the premises as you

1 testified?

2 MR. HARRIS: When I used the term  
3 chaotic, that was after the shooting, when the  
4 ambulances, the crowd, cars leaving out, you  
5 know. That's what I mean by chaotic during  
6 that time.

7 MR. SHORT: Okay. Are you aware that  
8 this Board saw a videotape of that evening, or  
9 that morning? We saw the actual videotape of  
10 the person being brought out. We also saw the  
11 group that you spoke of. We saw all that, and  
12 it kind of doesn't really collaborate with  
13 your testimony. We saw the gentleman being  
14 brought out, and then we saw him -- he looked  
15 a little agitated trying to come back up the  
16 steps a couple of times, looked like he even  
17 went back in one time.

18 MR. LeFANDE: I'm sorry. I'd like to  
19 object to the Board Member arguing with the  
20 witness.

21 CHAIRPERSON MILLER: Overruled.  
22 Okay. Are you going to ask him a question

1 based on what you saw?

2 MR. SHORT: Yes.

3 CHAIRPERSON MILLER: Okay.

4 MR. SHORT: If there was any -- I  
5 mean, no disrespect meant to you. But again,  
6 just getting back around to some questions.  
7 You were working there for four years.

8 MR. HARRIS: Going on four years,  
9 yes, sir.

10 MR. SHORT: Are there any regular  
11 patrons you see on a regular basis?

12 MR. HARRIS: Yes, sir. Yes, sir.

13 MR. SHORT: Would you say that was  
14 a pretty regular crowd that was there the  
15 night of the shooting?

16 MR. HARRIS: No. No, that was pretty  
17 much -- over half, if not more than half was  
18 -- I never seen before.

19 MR. SHORT: Also, now you've talked  
20 about this person that was ejected. Did you  
21 know him?

22 MR. HARRIS: No.

1 MR. SHORT: Never seen him before?

2 MR. HARRIS: No.

3 MR. SHORT: Okay. And the person  
4 that was ejected, he attempted to reenter, as  
5 you said, correct? Did he attempt to reenter?

6 MR. HARRIS: He was attempting to  
7 reenter along with the other individual when  
8 they was out in front of the gate during when  
9 that crowd was brought out.

10 MR. SHORT: Okay. But he was done  
11 for the evening, he was brought out, but now  
12 he's attempting to come back in. Is that  
13 normal?

14 MR. HARRIS: Yes, to a certain way,  
15 because when you have individuals come to the  
16 club, come to any club, especially if they  
17 coming to a group, and say if the individual  
18 gets thrown out and some friends are still in  
19 there, and a commotion occurs coming from the  
20 club -- come from leaving the club, it tends  
21 to make them be concerned, make sure it's not  
22 something that they with, and it was more of

1 in that sense. It wasn't like I'm going to  
2 just go run up in there and just come on in.  
3 It wasn't like that.

4 MR. SHORT: I understand that. But  
5 again, you said a person when they are  
6 ejected, or --

7 MR. HARRIS: Yes, sir.

8 MR. SHORT: -- they are considered  
9 done for the evening, they've done something  
10 inside the club to cause a problem for the  
11 club, correct?

12 MR. HARRIS: Yes, sir.

13 MR. SHORT: And then they're allowed  
14 to stay on the front of the building waiting  
15 for their friends to come out.

16 MR. HARRIS: Yes. He was on -- yes,  
17 sir. Yes, sir. Yes, sir.

18 MR. SHORT: Did that have anything  
19 to do with the chaotic situations you were  
20 speaking of?

21 MR. HARRIS: No. No.

22 MR. SHORT: There was no chaos at

1 all.

2 MR. HARRIS: No.

3 MR. SHORT: Okay. And you said there  
4 was no reimbursable MPD detail that night.

5 MR. HARRIS: Yes, sir.

6 MR. SHORT: That's your testimony.

7 MR. HARRIS: It was no officer in  
8 front of the club, as usual. It was not.

9 MR. SHORT: So do you think that the  
10 situation would have been different had you  
11 had a reimbursable MPD presence there that  
12 night?

13 MR. LeFANDE: Objection; that calls  
14 for speculation. This is a fact witness and he  
15 has not been qualified as an expert. And I  
16 think that's outside the scope of what he can  
17 testify to.

18 MR. ADAMS: I mean, the District's  
19 response is that it does ask for an opinion.  
20 However, I think in terms of based upon this  
21 person's experience in working there for four  
22 years, I think it would be within the scope of

1       reasonableness for him to answer that  
2       question.

3                   MR. LeFANDE: Again, the objection  
4       is that he's speculating as to a different  
5       outcome as to what would have happened had the  
6       police been there.

7                   CHAIRPERSON MILLER: Right.

8                   MR. LeFANDE: And that's -- I'm not  
9       going to try to get into some Frye analysis.

10                  MR. SHORT: I can rephrase.

11                  CHAIRPERSON MILLER: You're going to  
12       withdraw it?

13                  MR. SHORT: I'll rephrase it. I'll  
14       withdraw that.

15                  CHAIRPERSON MILLER: Okay.

16                  MR. LeFANDE: Thank you.

17                  CHAIRPERSON MILLER: Okay.

18                  MR. SHORT: I guess the question  
19       would be since you've been working there for  
20       four years, or coming up on four years, how  
21       many incidents have you had of shootings or  
22       cuttings when you've had the presence of a MPD

1 reimbursable detail?

2 MR. HARRIS: None.

3 MR. SHORT: No further questions.

4 CHAIRPERSON MILLER: Others? I want  
5 to follow-up then on Mr. Short's question. How  
6 about -- how many incidences have you had when  
7 you haven't had reimbursable detail? Do you  
8 know?

9 MR. HARRIS: It was this one and one  
10 probably about like a month and a half or two  
11 months, a window where somebody ended up  
12 shooting in the air and the police, they was  
13 on Queens Chapel Road and they end up coming  
14 down and caught the individuals in the car,  
15 like an alley like. But other than that, that  
16 was it.

17 CHAIRPERSON MILLER: So is that one  
18 other or two others? Did you say that's one  
19 other one, or two other incidents that you  
20 know of?

21 MR. HARRIS: Other than this one,  
22 and then the one I just now explained about.

1                   CHAIRPERSON MILLER: Okay. So when  
2 someone is considered done, what kind of state  
3 can they be in? What could that word be used  
4 to describe?

5                   MR. HARRIS: It could be a numerous  
6 of things because what I try not to do is get  
7 between the patron and the security that  
8 actually threw the person out. Meaning that if  
9 the person had tried to get me to let them  
10 back in, to see it their way, and the next  
11 thing I find myself having a whole dialogue  
12 all night long and trying to talk to this  
13 individual, and this individual trying to talk  
14 to me while I'm trying to do my job. But it be  
15 from a person underage drinking, disrespecting  
16 a female, it could be a numerous of things. I  
17 just try not to get into it.

18                   CHAIRPERSON MILLER: So, does it  
19 matter, though, for the security person who is  
20 escorting them to tell you the reason?

21                   MR. HARRIS: To a point, if it's  
22 like a fight or a person did something to

1 somebody, then they'll pretty much let me  
2 know.

3 CHAIRPERSON MILLER: Okay.

4 MR. HARRIS: You know, and then they  
5 also -- sometime when a person be kind of  
6 hostile, or did something they really had no  
7 business doing, they say all right, look, man  
8 -- when they bring him out they say all right,  
9 man, just get to walking up the street. So  
10 when they tell them that, then I make sure  
11 they don't stand in the front.

12 CHAIRPERSON MILLER: Is it common  
13 for someone who's been ejected to hang around  
14 in the front for an hour and a half or so?

15 MR. HARRIS: Yes, ma'am, because a  
16 lot of them, they be riding with somebody  
17 else. So sometime, I may have them standing  
18 down the street or move down - as long as  
19 they aren't blocking the walkway or disturbing  
20 the flow of people coming in, you know, on  
21 line.

22 CHAIRPERSON MILLER: Okay, thank

1 you. Any other questions?

2 MR. SHORT: I just have one last  
3 one.

4 CHAIRPERSON MILLER: Yes, Mr. Short.

5 MR. SHORT: You testified also that  
6 you were there until 4 a.m. Is that the time  
7 you left, 4 a.m.?

8 MR. HARRIS: Yes, sir.

9 MR. SHORT: And the shooting  
10 occurred at what time?

11 MR. HARRIS: Just between a window,  
12 I'd say like 2:35 to probably 2:50. It was  
13 within that window.

14 MR. SHORT: Somewhere around 3:00,  
15 ballpark?

16 MR. HARRIS: If I say 3:00, it's  
17 probably like 10 minutes to three.

18 MR. SHORT: Okay, and you were  
19 there. And what time did the crowd dissipate?

20 MR. HARRIS: The crowd started  
21 leaving - okay, yes, the first wave of crowd  
22 where security was escorting out, that was

1     like 2:00, 2:40, 22, 40, 2:45. That's when  
2     that crowd, security started escorting that  
3     crowd out that was having an argument.

4             And then when that crowd got down  
5     to the end of the gate and they all started  
6     walking up, and then other people started  
7     coming out and they was lingering. Like I  
8     stated earlier, they was lingering in the  
9     driveway, and I went ahead to move them, then  
10    more people was coming out, and then that's  
11    when the shooting started happening.

12            MR. SHORT: What was the capacity  
13    that night of the - the number of patrons  
14    were in the club that night?

15            MR. HARRIS: It was pretty packed  
16    because they was coming for like a fund raiser  
17    from some guys that had got killed in a car  
18    accident. So, it was more like - it was like  
19    - to me it was like more like a funeral  
20    party, because most everybody had on these  
21    rest in peace shirts. So that was when I say  
22    like, these aren't the normal crowd and I

1 never really seen before.

2 MR. SHORT: Okay. Now, you had a  
3 large crowd.

4 MR. HARRIS: Yes, sir.

5 MR. SHORT: You had a couple of  
6 incidents inside, someone had to be brought  
7 out. And let me ask you, is that the only way  
8 in and out of the club?

9 MR. HARRIS: Yes. Yes.

10 MR. SHORT: So if the shooting had  
11 occurred at the gate, then everybody just had  
12 to stay in the club.

13 MR. HARRIS: If the shooting had by  
14 the end of the gate?

15 MR. SHORT: Yes.

16 MR. HARRIS: Yes.

17 MR. SHORT: No further questions.

18 CHAIRPERSON MILLER: Others? I have  
19 one other question. There's been a lot of  
20 discussion about the gentleman that was  
21 ejected who was also shot in the leg.

22 MR. HARRIS: Excuse me?

1                   CHAIRPERSON MILLER: The gentleman  
2 who was ejected was also shot in the leg, iJs  
3 that right?

4                   MR. HARRIS: No.

5                   CHAIRPERSON MILLER: That wasn't the  
6 same person?

7                   MR. HARRIS: No, that wasn't the  
8 same person.

9                   MR. LeFANDE: I don't believe that  
10 testimony

11                   CHAIRPERSON MILLER: I'm sorry,  
12 thank you. I was just clarifying.

13                   MR. LeFANDE: Yes, no problem. Yes.  
14 I think there was one person shot who was  
15 wearing a white shirt, and there was a person  
16 who was ejected wearing a white shirt. I think  
17 that might have been the source of confusion.

18                   CHAIRPERSON MILLER: Okay.

19                   MR. LeFANDE: But I don't think  
20 there's been any testimony and any evidence on  
21 the record -

22                   CHAIRPERSON MILLER: That they're

1 the same.

2 MR. LeFANDE: As to the - that  
3 person being one and the same.

4 CHAIRPERSON MILLER: Okay. Thank you  
5 for the clarification. So, there's been a lot  
6 of discussion about the person that was  
7 ejected and hanging around for an hour and a  
8 half or so. And I'm wondering, to your  
9 knowledge is there some connection between  
10 that gentleman and any of the violence that  
11 occurred that night?

12 MR. HARRIS: No, ma'am. Like I say,  
13 that gentleman that - whatever he got ejected  
14 for out the club for, whatever reason, he was  
15 calm, cool, collected, he didn't cause no  
16 problems. He wasn't making no gestures, he  
17 wasn't saying nothing to indicate anything  
18 that you shouldn't be here, you know. He was  
19 just -

20 CHAIRPERSON MILLER: Okay. I was  
21 just trying to figure out what his connection  
22 was. Okay, thank you. So, now questions on

1 Board questions and rebuttal questions.

2 MR. LeFANDE: Just briefly on  
3 redirect on one point. I'm sorry, two points.

4 REDIRECT EXAMINATION

5 BY MR. LeFANDE:

6 Q I did hear you respond in the  
7 affirmative to an Attorney General question.  
8 I just want to make sure that this is  
9 clarified. Are you the person who screens for  
10 weapons?

11 A No.

12 Q Okay.

13 A No.

14 Q What is your - at the front gate,  
15 you have a gatekeeper function, and what is  
16 that you are screening people for at that  
17 point?

18 A I'm screening for identification,  
19 also the behavior when a person comes into the  
20 club, meaning that if a person is intoxicated,  
21 under narcotics, I don't let you in. If you -

22 Q So someone other than you does the

1 pat downs and the metal detector?

2 A Yes, sir.

3 Q Okay. You said that there was one  
4 way in in response to Chief Short's question,  
5 that there was one way in and one way out for  
6 the patrons. Are there, in fact, emergency  
7 exits in the building?

8 MR. ADAMS: Objection, leading.

9 CHAIRPERSON MILLER: Overruled. Go  
10 ahead.

11 BY MR. LeFANDE:

12 Q Are there emergency exits in the  
13 building?

14 A Yes, sir.

15 Q And how many of those are there?  
16 Are you familiar with them? I'm sorry, let me  
17 ask you that first.

18 A Yes, you got the back loading dock  
19 area where you got the emergency door, and you  
20 got a gate lift.

21 Q And there's a gate lift? I'm sorry,  
22 I'm not familiar with that.

1           A       Towards the back.

2           Q       That's a roll-up door. Is that what  
3 you're talking about?

4           A       Yes, sir.

5           Q       But are there swinging doors,  
6 emergency doors in the building? Are there  
7 swinging emergency doors, regular opening  
8 doors, emergency doors?

9           A       Yes, sir.

10          Q       And where are those located?

11          A       That's in the front part area.

12          Q       In the front part area? Where does  
13 that open up to? Where does that open up to?

14          A       It open up to you go into the club.

15          Q       But, okay, which - where does it  
16 go from the club? Where does the door open to,  
17 to - for the emergency exit, where would -

18          A       Okay. The emergency exit is in the  
19 back.

20          Q       Okay.

21          A       And you have the emergency exit  
22 door, and then you also have the gate lift.

1           Q       Okay. And where would that door  
2 lead to?

3           A       It would lead to Adams Street.

4           Q       Okay. And so - but you said it's  
5 towards the back.

6           A       It's in the back.

7           Q       It's in the back, so is there an  
8 alley or something that would connect it to  
9 Adams Street?

10          A       Yes, sir.

11          Q       Or that gate - that door wouldn't  
12 open directly to Adams Street, then.

13          A       No, because The Scene Nightclub  
14 sits in like - if you want to say more like  
15 an alley where you got a right and a left  
16 side.

17          Q       Okay. I think what Chief Short was  
18 getting at is if something had happened  
19 directly at the front gate people would have  
20 a different way to get away from that?

21          A       Yes, sir.

22          Q       Using that emergency exit?

1           A       Yes, sir.

2           Q       And they wouldn't wind up in the  
3 same place?

4           A       No, no.

5           Q       I may have caused some confusion  
6 here and I just want to clarify this. You are  
7 certified as a security officer by SOMB. Is  
8 that correct?

9           A       Yes.

10          Q       And you wear -- that is a uniformed  
11 job, is that correct?

12          A       Yes, sir.

13          Q       Okay. You don't work as a uniformed  
14 security officer for The Scene?

15          A       No.

16          Q       You work as a security, nightclub  
17 security staff. Is that correct?

18          A       Yes.

19          Q       So, you don't wear a uniform then.

20          A       That's correct.

21          Q       Okay. I just wanted to clarify  
22 that. I think I may have caused that confusion

1       there.

2                   As a security officer or security  
3       nightclub personnel, do you have any authority  
4       to tell people what to do outside of the club?

5                   MR. ADAMS: Objection, beyond the  
6       scope of direct questions and the Board's  
7       questions.

8                   MR. LeFANDE: I believe the question  
9       was from the Board, was as to what they told  
10      people to do once they were told to go outside  
11      the gate.

12                  CHAIRPERSON MILLER: Did you ask  
13      that?

14                  MEMBER SHORT: No, I did not ask  
15      that.

16                  CHAIRPERSON MILLER: I didn't ask  
17      that.

18                  MR. LeFANDE: Were they allowed to  
19      stand in front of the gate once they were told  
20      to -

21                  CHAIRPERSON MILLER: Oh.

22                  MR. LeFANDE: And the question is --

1 I just want to elicit from him that he  
2 doesn't have any -

3 CHAIRPERSON MILLER: Okay. I may  
4 have asked something about -

5 MR. LeFANDE: Yes, I apologize. My  
6 notes are kind of -

7 CHAIRPERSON MILLER: Okay.

8 MR. LeFANDE: - a mess as it is,  
9 so, I do believe there was a question about  
10 what the people are told to do once they're  
11 outside the gate.

12 CHAIRPERSON MILLER: Okay.

13 MR. LeFANDE: And I just think that  
14 it is appropriate in this instance to  
15 understand that even though he has his  
16 special -

17 CHAIRPERSON MILLER: Okay, I'm going  
18 to allow the question.

19 MR. LeFANDE: - qualification -

20 CHAIRPERSON MILLER: That's okay.  
21 Why don't you go right to the question?

22 BY MR. LeFANDE:

1           Q       Do you have any authority as either  
2           a security officer or as security personnel  
3           for a nightclub to tell people what to do  
4           outside of the nightclub space?

5           A       No, I - no, I can't make them just  
6           move.

7           Q       And when - once this person was  
8           either on the sidewalk or onto Adams Place,  
9           was that outside of the club's property?

10          A       It's outside the gate. Yes, sir. On  
11          the street.

12                   MR. LeFANDE: I have no further  
13          questions. I'm sorry about that.

14                   CHAIRPERSON MILLER: Okay. I just  
15          want to ask for a clarification there. Did you  
16          say you can make them move?

17                   MR. HARRIS: No, I said I can't make  
18          them move.

19                   CHAIRPERSON MILLER: You can't make  
20          them move. Okay, thank you.

21                   MR. ADAMS: I also have a couple of  
22          questions for redirect. I just want to - for

1 recross. This is just more on a point of  
2 clarification. I'm going to provide - I  
3 wanted to approach the witness with a couple  
4 of exhibits.

5 MR. LeFANDE: Those are the same  
6 ones marked previously as part of Exhibit 1?

7 MR. ADAMS: Yes.

8 MR. LeFANDE: Okay.

9 MR. ADAMS: This is part of Exhibit  
10 1.

11 MR. LeFANDE: No objection to that.

12 CHAIRPERSON MILLER: Okay.

13 RE-CROSS-EXAMINATION

14 BY MR. ADAMS:

15 Q So, this is - I want to - I'm  
16 going to present to you, to the witness -  
17 first of all, this is Exhibit 16 of District  
18 Exhibit 1. So this photograph, it shows like  
19 the gate, correct, and -- sorry. Court  
20 Reporter, can you hear me from here? All  
21 right, so that's the gate - so, it's a gate  
22 and entryway, so in front of that gate, that's

1 Al's Place. Correct?

2 A Yes, sir.

3 Q Okay. So when you're - when you're  
4 saying that you - where you're staged, then,  
5 essentially is that where you're staged in  
6 relation to being able to check IDs and where  
7 patrons enter, correct?

8 A Yes, I put the cones up leading to  
9 this gate right here. I make more of like a  
10 tunnel with the cones.

11 Q Okay. So, you have a tunnel of  
12 cones right in front of the gate?

13 A Yes, sir.

14 Q Okay. So I'm going to show the  
15 witness - and by the way, you stated that  
16 when you assisted a patron who had been shot  
17 in the leg in your earlier testimony -

18 MR. LeFANDE: Objection, that was  
19 not his testimony.

20 MR. ADAMS: I'm pretty sure it was  
21 his testimony, but - you know, I'll withdraw  
22 the question.

1                   CHAIRPERSON MILLER: Okay.

2                   MR. ADAMS: I was -- all right. So,  
3 I'm going to go to Exhibit 17 of Exhibit 1.

4                   BY MR. ADAMS:

5                   Q       So, that photograph is - that's  
6 looking back towards the front entry, correct?

7                   A       Yes.

8                   Q       So right where the gate is, you're  
9 stationed right at the gate, correct?

10                  A       That's correct.

11                  Q       But the door of the establishment  
12 is further out; it's further out that  
13 alleyway, correct?

14                  A       You're talking about The Scene  
15 nightclub?

16                  Q       Yes, The Scene nightclub.

17                  A       Yes, further up.

18                  Q       All right. And so last I'll show  
19 you Exhibit 18 of Exhibit 1. So where the  
20 stairwell is, I guess it looks like a couple  
21 of stairwells back there?

22                  A       That's correct.

1 Q And there's - it looks like a red  
2 door. So back there, that's where the actual  
3 doorway is for The Scene. Correct?

4 A The doorway is right here.

5 Q Okay. Well, you have to tell me,  
6 the door is in the center next to where the  
7 roll-out area is?

8 A Right, the entry door is beside the  
9 red door.

10 Q Okay. And so in terms of distance,  
11 now that's about - is that over 20 feet from  
12 the gate area to where that door is?

13 A I'm not sure.

14 MR. ADAMS: Okay, no problem. I just  
15 want - those are my only questions.

16 CHAIRPERSON MILLER: Okay.

17 MR. LeFANDE: We have nothing  
18 further for this witness and he may be  
19 excused.

20 CHAIRPERSON MILLER: Yes, he may be  
21 excused.

22 MR. LeFANDE: If he wants, may he

1 remain? I don't know if he wants to -

2 CHAIRPERSON MILLER: Do you have any  
3 thoughts on that?

4 MR. ADAMS: If he has no - if we do  
5 all the testifying, then the District has no  
6 objections.

7 CHAIRPERSON MILLER: He's not  
8 testifying again. He's not testifying again --

9 MR. LeFANDE: No, no. I have to go  
10 find the other witness, I think in the  
11 conference room, if I have the Board's  
12 indulgence to do so.

13 CHAIRPERSON MILLER: Okay.

14 MR. LeFANDE: Thank you.

15 (Whereupon, the above-entitled  
16 matter went briefly off the record at 12:30  
17 p.m. and resumed at 12:31 p.m.)

18 Mr. LeFANDE: Thank you, Madam  
19 Chair.

20 CHAIRPERSON MILLER: Okay, you may  
21 call your witness.

22 MR. LeFANDE: Respondent, MPAC LLC

1 calls Cornell Jones to the stand.

2 CHAIRPERSON MILLER: Okay, Mr.

3 Jones, good afternoon.

4 WHEREUPON,

5 CORNELL DEONCE JONES, JR.

6 was called as a witness and, after having been

7 first duly sworn, was examined and testified

8 as follows:

9 CHAIRPERSON MILLER: Okay. Please  
10 have a seat.

11 MR. LeFANDE: Thank you.

12 DIRECT EXAMINATION

13 BY MR. LeFANDE:

14 Q Could you please state your full  
15 name for the record.

16 A Cornell Deonce Jones, Jr.

17 Q Okay. And how are you presently  
18 employed?

19 A Security for The Scene nightclub.

20 Q And how long have you been employed  
21 in - performing security at The Scene  
22 nightclub?

1           A        Since 2010.

2           Q        Since 2010. And do you have a title  
3 in the performance of your duties?

4           A        Yes, now I'm head of security of  
5 the -

6           Q        You are now the head of security --

7           A        Head of security, yes.

8           Q        -- for The Scene nightclub.

9           A        Yes.

10          Q        And how long has that been?

11          A        That's been since say four years,  
12 sir.

13          Q        Okay. Do you have any training in  
14 the field of physical and personal security?

15          A        Somewhat. I did Corrections and  
16 also Juvenile Detentions.

17          Q        Okay. And how many years - and  
18 what job did you do in Corrections?

19          A        Correctional Officer.

20          Q        You were a Correctional Officer.  
21 And where was that, sir?

22          A        Department of Maryland.

1 Q Where?

2 A In Maryland.

3 Q In Maryland, okay. And how many  
4 years did you perform duties as a Corrections  
5 Officer?

6 A Total of 15 years.

7 Q Fifteen years. And what training  
8 did you receive in the course of your career  
9 as a Corrections Officer as it pertains to  
10 physical and personal security?

11 A For physical and personal security,  
12 pretty much try to maintain as much order as  
13 possible. To basically try to understand  
14 movements and body movement and language to  
15 suggest or might indicate a fight or any of  
16 that nature.

17 Q And in the process of this career,  
18 did you ever involve yourself in the business  
19 of screening persons for concealed weapons?

20 A Yes. Yes.

21 Q And could you please describe for  
22 us what your experience, training, and

1        qualifications with regards to the business of  
2        screening persons with - for concealed  
3        weapons?

4            A        As an intake officer, you pretty  
5        much have to try to talk to them to see  
6        exactly what their mental is, and searching  
7        them, body searching, cavity searching, just  
8        physically searching the individual to make  
9        sure they're not bringing anything dangerous  
10       inside the facility.

11           Q        And would - what kinds of weapons  
12       would you ordinarily screen for?

13           A        Knife, guns, blades, anything that  
14       can hurt folks.

15           Q        And aside from knives, and guns,  
16       and blades, would you also screen for any  
17       other kinds of weapons?

18           A        Any other kind of weapons?

19           Q        Unconventional weapons.

20           A        Oh, yes.

21           Q        And could you describe for us what  
22       some of those might be?

1           A       Cans, any metal objects, any  
2 liquids that we can find on their persons.

3           Q       So, in addition to having some  
4 experience in screening for conventional sorts  
5 of weapons, you have some 15 years experience  
6 in screening persons for things that the  
7 ordinary person might not consider to be -

8           A       Dangerous.

9           Q       - a weapon, but that could be used  
10 as a weapon.

11          A       Yes.

12          Q       Is that correct? And you have some  
13 experience in the use of metal detectors -

14          A       Yes.

15          Q       - with regards to doing this -  
16 performing this kind of screening. Is that  
17 correct?

18          A       Yes.

19          Q       Okay. And in your position as the  
20 head of security for the establishment, do you  
21 have the opportunity to be involved in the  
22 screening of weapons for the establishment?

1           A       Yes, I do.

2           Q       Okay. And could you describe first  
3 what your involvement would be in -

4           A       I -

5           Q       Let me finish the -

6           A       Okay.

7           Q       We have a person over here who's  
8 taking down everything that's being said, and  
9 when we start talking over each other, which  
10 inevitably happens -

11          A       No problem.

12          Q       - it gets confusing to read. So  
13 let me finish the sentence as best I can, and  
14 then we'll proceed.

15                   In your duties as the head of  
16 security for the establishment, you're  
17 involved in the screening of weapons. What is  
18 your involvement, as such?

19          A       Pretty much my involvement is to  
20 hire people to make sure they do the job  
21 correctly. Also, I stand watch on certain days  
22 to make sure they're performing their actual

1 duty. I might actually help in the searching,  
2 also, in the searching process.

3 Q Do you impart your training and  
4 experience to the persons that are doing these  
5 things, that you received from your 15 years  
6 experience -

7 MR. ADAMS: Objection. Leading.

8 MR. LeFANDE: I don't think there's  
9 anything leading about that.

10 CHAIRPERSON MILLER: I'm going to  
11 allow it, just answer briefly.

12 BY MR. LeFANDE:

13 Q Do you use - do you train the  
14 persons who perform these functions at The  
15 Scene nightclub, using the skills that you  
16 have received from your 15 years experience?

17 A Yes, I do.

18 Q Okay. And you said that you watch  
19 them perform these duties?

20 A Yes.

21 Q And you perform these duties  
22 yourself, you said.

1           A       Yes.

2           Q       And do the employees watch you  
3 perform those duties?

4           A       Yes, they do.

5           Q       Okay. And could you describe for me  
6 briefly, you said that you supervise these  
7 people. How much of your time in the course of  
8 an evening would you spend supervising the  
9 screening of the weapons, for weapons?

10          A       It's pretty much from - almost  
11 from the beginning to about - almost an hour  
12 and a half until I'm starting work. Because  
13 after about an hour and a half, we start to  
14 get a little crowd into the club, so that's  
15 when I start making my way inside the club.

16          Q       So do I understand your testimony  
17 that for the first hour and a half that  
18 they're open, you are at where they screen for  
19 weapons?

20          A       Yes.

21          Q       And then you do other things?

22          A       Yes.

1           Q       And describe for me what are the  
2 other things that it is that you do after the  
3 crowd begins to - after it begins to get  
4 crowded.

5           A       Normally, I walk around the club to  
6 monitor, to make sure everybody is where  
7 they're supposed to be at, make sure the club  
8 - make sure the stage is clear from people  
9 who's not actually performing on the stage. I  
10 monitor and try to maintain as much order as  
11 possible inside the club with my people, and  
12 also with the patrons.

13          Q       And once you leave the security  
14 screening station after an hour and a half of  
15 it being open, do you ever return to that?

16          A       Yes, I do.

17          Q       And could you describe for me how  
18 often you return that?

19          A       I try to return to that every,  
20 probably like every 30 minutes or every 40  
21 minutes, if I can, to see if the crowd - if  
22 it's actually crowded outside.

1           Q       Okay. And do you continue to  
2 monitor the weapon screening process during  
3 this time?

4           A       Yes, sir.

5           Q       Okay. Turning your attention to the  
6 evening of - I'm sorry, the morning of May  
7 17th of this year, do you have any specific  
8 recollection of any incidents that occurred  
9 inside the club?

10          A       Yes. The first - we had two  
11 incidents. The first incident, I was actually  
12 outside searching with my outside detail when  
13 the two - my two security guards actually was  
14 bringing two individuals out. They brought  
15 them straight to me because that's what I told  
16 them to do, bring them to me so we can  
17 separate them, so we won't be putting  
18 everybody out at the same time.

19          Q       And when - you said that you have  
20 - you said that you've instructed the  
21 security personnel to bring persons to you,  
22 and do you ordinarily have an opportunity to

1 speak with these persons once they're brought  
2 to you?

3 A Yes.

4 Q And what is it that you ordinarily  
5 discuss with these people when they're brought  
6 to you?

7 A Try to - from them, from their  
8 point, try to figure out exactly what happened  
9 --

10 Q Okay.

11 A -- before I talk to my security  
12 staff.

13 Q And was there an opportunity to do  
14 that with regards to the first two people that  
15 were brought to you that morning?

16 A Yes, there was.

17 Q Okay. And just backing up just a  
18 little bit, did you have an opportunity to  
19 find out what the nature of the event was that  
20 evening and morning?

21 A Yes.

22 Q And what was the nature of that

1 event?

2 A Two individuals got into a slight  
3 altercation because one of -

4 Q I meant the nature of the event for  
5 the -

6 A Oh, the event itself?

7 Q Yes.

8 A Oh, oh, they had - they was  
9 actually giving a benefit concert for two  
10 individuals who had passed away in a car  
11 accident.

12 Q Were these young people that passed  
13 away in the -

14 A Yes.

15 Q - or old people?

16 A Yes, young.

17 Q And were the persons who were  
18 attending this event, were they supposedly the  
19 person who knew the decedents?

20 A Pretty much, yes.

21 Q Okay. And did you come to learn  
22 that by observing these people at some point?

1           A       Observing them, and also observing  
2           the clothing that they had on.

3           Q       And what was unique about their  
4           clothing that told you that, that gave you  
5           information about this?

6           A       Because it was two individuals,  
7           most of them had on their names and rest in  
8           peace on their shirts.

9           Q       So, they had shirts. Now, these  
10          were printed shirts that had the information  
11          about the decedents on them?

12          A       Yes.

13          Q       Okay. And a lot of the people in  
14          the establishment were wearing these shirts?

15          A       Yes, sir.

16          Q       Okay, very good. And do you have  
17          any idea as to when the decedents died  
18          relative to the -

19          A       It was -

20                   MR. ADAMS: Objection. Relevance.

21                   MR. LeFANDE: As to the state of  
22          mind of the crowd. If these people had died

1 very recently, then I think a lot of what  
2 happened here had to do with the emotion and  
3 mind set of the persons who were in the  
4 establishment. And establishing that this was  
5 a very recent and sudden death speaks to why  
6 people were upset in the manner that they were  
7 in the establishment, and it explains what -  
8 further as to what he was learning about why  
9 people were acting up inside the  
10 establishment.

11 MR. ADAMS: Well, I think that  
12 characterized a lot of potential testimony.

13 CHAIRPERSON MILLER: Now, is the  
14 question just when did they die? Is that the  
15 question?

16 MR. LeFANDE: Yes, was this  
17 recently, was this a 10th year anniversary? I  
18 think that makes a big difference.

19 CHAIRPERSON MILLER: Okay. Let's  
20 just have a short - we can have a short -  
21 I'm going to overrule the objection to let  
22 you provide a short answer, if you know when

1 the individuals died that they were  
2 commemorating, memorializing.

3 THE WITNESS: That was the morning  
4 of the 16th, so it was last Friday.

5 BY MR. LeFANDE:

6 Q Just a week ago earlier.

7 A It was a week ago.

8 Q So, relatively recently that this  
9 had happened.

10 A Yes. That morning - actually,  
11 Friday - yes, Saturday morning. Saturday  
12 morning.

13 Q Thank you. Thank you. And the -  
14 so, a week ago earlier, two people had died  
15 in a car crash and this was an event that  
16 spoke to this passing of these two people.

17 A Yes.

18 Q And turning your attention now back  
19 to the two people who were brought to you and  
20 that you had an opportunity to speak to, what  
21 did you learn from speaking with them?

22 A From speaking with one individual

1 first, the first individual let me know that  
2 - what actually took place inside the club  
3 when he was brought to me, while he was  
4 brought to me. And it was over one of the -  
5 the other gentlemen pushing a young lady in  
6 her face.

7 Q Okay. So somebody got pushed, and  
8 one of these people was involved in the  
9 pushing?

10 A Yes.

11 Q And did you speak to the person who  
12 did - who purportedly did the pushing?

13 A Yes, I did. I also had a chance to  
14 speak to him.

15 Q Okay. So what about the person who  
16 apparently pushed the woman, what about --  
17 what did you observe about his demeanor?

18 A He was calm.

19 Q He was calm?

20 A Yes.

21 Q Did he argue with you?

22 A No, sir.

1 Q Was he hostile?

2 A No, sir.

3 Q Okay. Did he say anything to you at  
4 all about what happened?

5 A He let me - he did state that he  
6 did push the young lady.

7 Q That he pushed her.

8 A Yes.

9 Q Okay. And what did you say to him?

10 A Actually, after briefly talking to  
11 him, I just told him, you know, there was no  
12 way that we was going to allow him to come  
13 back into the club because of that incident.

14 Q He had to go?

15 A Yes, he had to leave.

16 Q Okay. And how did he take that when  
17 you told him that?

18 A He didn't - he was calm. He didn't  
19 take it personal.

20 Q Okay. And he didn't argue with you?

21 A No, sir.

22 Q Did he appear to be injured to you,

1 in any way?

2 A No, sir.

3 Q Did he ask you to call the police?

4 A No, sir.

5 Q Did he ask you to call an

6 ambulance?

7 A No, sir.

8 Q Okay. Did you have an opportunity

9 to talk to the other man?

10 A Yes, sir.

11 Q And what did he say to you?

12 A He was - he actually told me

13 exactly what happened.

14 Q And what did he say?

15 A He told me that they got into it

16 because the individual pushed - smushed his

17 sister, it was his sister that was actually

18 smushed in her face.

19 Q So, the woman who got pushed, it

20 was her brother that you were speaking to.

21 A Yes.

22 Q And he was upset about her getting

1 pushed. Is that what I understand you're  
2 saying?

3 A Yes.

4 Q And did he ask you to call the  
5 police about this?

6 A No, sir.

7 Q Okay. Did he appear to be injured?

8 A No, sir.

9 Q Did he say his sister was injured?

10 A No, sir.

11 Q Okay. What was his demeanor like?

12 A Talking to him, he was calm, also.

13 Q He was calm.

14 A Yes.

15 Q Was he arguing with you?

16 A No, sir.

17 Q Did he demand the other person be  
18 taken out of the club?

19 A No, sir.

20 Q Okay. You did that on your own  
21 accord.

22 A Yes, sir.

1           Q       Okay. Did you see any reason why  
2 you should have called the police on either  
3 one of these gentlemen?

4           A       No, sir, no reason.

5           Q       Did they seem that they would fight  
6 any more?

7           A       No.

8           Q       Or that there was any further  
9 reason - any other reason that you had to be  
10 concerned about the two of them?

11          A       No, sir.

12          Q       Okay. What happened after you spoke  
13 with the two of them?

14          A       After I spoke with the two of them,  
15 I talked to the manager and also Will, to let  
16 them know exactly what was going on, and let  
17 them know exactly what I was going to do.

18          Q       What did you tell them when you  
19 told them what was going on?

20          A       I told them both about the  
21 incident, and also told them that I was going  
22 to be letting one of them back into the club.

1 Q And which one was that?

2 A The brother - the sister's  
3 brother.

4 Q The sister's brother. Very good.  
5 And what about the other person?

6 A The other person, I escorted him to  
7 the gate and let the security personnel at the  
8 gate know that he wasn't allowed back into the  
9 -

10 Q And what exactly did you say to the  
11 person at the gate concerning that?

12 A That he was done.

13 Q He was done.

14 A He was done.

15 Q Okay. Did you give him any other  
16 information?

17 A No.

18 Q Okay. Did you - did the person who  
19 you said was done, did he comply when you took  
20 him to the gate?

21 A Yes, he complied. He stayed outside  
22 the gate.

1           Q       Okay. Did you have an opportunity  
2 to observe him outside the gate?

3           A       Yes.

4           Q       And did he appear to be any kind of  
5 a problem outside the gate?

6           A       No.

7           Q       Did he argue with anyone?

8           A       No.

9           Q       Did he appear that he wanted to  
10 fight with anyone?

11          A       No.

12          Q       Did he appear to be any kind of  
13 danger to himself or others?

14          A       No, sir.

15          Q       Okay. Was he impeding traffic?

16                 MR. ADAMS: I'm going to object. I  
17 mean, I think in terms of characterizing  
18 observations, and I think it was done with the  
19 prior witness, and this witness, as well.  
20 They're being pretty much led in terms of -  
21 to providing characterizations of -

22                 CHAIRPERSON MILLER: You object?

1 MR. ADAMS: I object.

2 CHAIRPERSON MILLER: Sustained.

3 MR. LeFANDE: This is a huge point  
4 of contention in this case right now as to  
5 whether the establishment's security personnel  
6 acted appropriately in response to these two  
7 incidents. Now, we can -

8 MR. ADAMS: The evidentiary thing is  
9 that it was leading.

10 CHAIRPERSON MILLER: Right.

11 MR. ADAMS: The person can provide  
12 whatever the evidence is but, I mean, again,  
13 the issue isn't the problem.

14 CHAIRPERSON MILLER: Okay.

15 MR. ADAMS: It's the fact that -

16 CHAIRPERSON MILLER: Leading  
17 questions.

18 MR. ADAMS: It's leading questions,  
19 and I believe the person is competent to -

20 CHAIRPERSON MILLER: Please rephrase  
21 your questions so that they're not leading.

22 MR. ADAMS: - provide the

1 information.

2 MR. LeFANDE: Yes, I will try to  
3 endeavor to not offend the Attorney General  
4 with what I don't perceive to be leading  
5 questions, but I will try to rephrase them.

6 CHAIRPERSON MILLER: Thank you.

7 BY MR. LeFANDE:

8 Q Was there anything about the  
9 person's demeanor that you thought while they  
10 were standing out in front of the gate that  
11 you should call the police?

12 A No.

13 Q Okay. At any point did anyone else  
14 tell you you should call the police about this  
15 person?

16 A No.

17 Q Okay. And how - did you continue  
18 to stay at the gate, or did you leave?

19 A No, I returned back to searching.

20 Q At the - where - at the - where  
21 were they searching?

22 A We was actually searching at the

1 beginning of the gate, and it was like in  
2 between the gate, the front of the gate and  
3 also in front of the club, so it was like a  
4 little walkway.

5 Q So, you were on a little - the  
6 gate. Did you have fences up or something?

7 A Yes, there's fences.

8 Q It's like a little cattle -

9 A Yes.

10 Q Okay. So, you had a little cattle  
11 trough and people had to go through that to  
12 get screened.

13 A Yes.

14 Q And you returned to that. And where  
15 was it at that point?

16 A You're saying where was it?

17 Q Where was the screening going on?

18 A The screening was going outside the  
19 - right outside of the doors of the club.

20 Q So, you're at the other end of the  
21 fenced in area at this point.

22 A Yes.

1           Q        Could you observe the person who  
2 was put out from there?

3           A        Yes.

4           Q        You still could observe him.

5           A        I still could see.

6           Q        And did you see any problem while  
7 you were back at the security screening  
8 station?

9           A        No, just that he was standing  
10 around.

11          Q        He was still present but was not --  
12 you didn't see anything about him that  
13 concerned you.

14          A        No.

15          Q        Okay. What happened next after you  
16 returned to the security screening station?

17          A        I went back to searching say about  
18 an hour and a half and to standing outside a  
19 little bit longer. I went back inside the  
20 club, came back out, talked to the security  
21 outside. Then I still noticed that the  
22 gentleman was still lingering outside the

1 gate, so I went to go talk to him.

2 Q You talked to the guy outside the  
3 gate again?

4 A Yes.

5 Q Okay.

6 A And I went back outside to talk to  
7 him.

8 Q And what did he say?

9 A Pretty much that he was - I was  
10 trying to figure out why he was hanging around  
11 because I didn't want there to be a problem at  
12 the end of the night when we actually let out.

13 Q So, just him standing there made  
14 you go back outside -

15 A Just made - yes.

16 Q - to find out what was going on.

17 A Yes. Made me cautious a little bit  
18 more.

19 Q And what did you find out?

20 A That he was actually waiting for  
21 individuals for his ride inside the club.

22 Q Okay.

1           A       That were still inside the club.

2           Q       Was that a good reason that you  
3 thought for him to be standing there?

4           A       It was a good enough reason for him  
5 to be standing there.

6           Q       Okay. So, he was there because he  
7 was waiting for a ride.

8           A       Yes, he was still waiting for his  
9 ride.

10          Q       Okay. And this didn't give you any  
11 further concern once he explained that to you?

12          A       Once he explained that, I still was  
13 still a little bothered by it, but I wasn't  
14 concerned about it.

15          Q       What happened next?

16          A       Walked away, came back up, went  
17 back to work.

18          Q       You went back to work.

19          A       Yes, sir.

20          Q       And were there any other incidents  
21 that night that you recall?

22          A       Inside the club, just noticed a

1 large gathering inside the club. Looked like  
2 there were some individuals was just doing a  
3 little too much pushing, so we responded to  
4 that.

5 Q And you went over to it?

6 A Yes.

7 Q Okay. And where was that located?

8 A That was in the middle of the dance  
9 floor.

10 Q Okay. And the question came up  
11 earlier, and we'll see, maybe you have an  
12 answer about this, about how many people were  
13 in the establishment at this point?

14 A At that point?

15 Q Yes.

16 A I didn't have - yes, I -

17 Q If you don't know, that's fine.

18 A I really don't know.

19 Q Okay.

20 A I really don't know. It was a  
21 little crowded.

22 Q It was a little crowded?

1           A       Yes, it was crowded.

2           Q       Okay. Okay. And you observed that  
3 there were some people who were pushing one  
4 another, and you went over to find out what  
5 was going on?

6           A       Yes.

7           Q       And what did you find out?

8           A       They were still - I'm just dealing  
9 with them because everybody was all together.  
10 There were still a little bit of emotions  
11 brewing up from the accident.

12          Q       All right. So, was the music  
13 playing at this point?

14          A       Yes.

15          Q       Okay. Were the lights on?

16          A       The lights was on.

17          Q       And what time do the lights go on?

18          A       I turn on the lights because the  
19 party is over, we turn on the lights at  
20 exactly 2:45.

21          Q       2:45, so the lights were on when  
22 you went over there.

1           A       Yes.

2           Q       But the music was still playing.

3           A       Still playing.

4           Q       Okay. And with the music playing  
5 were you able to talk to them about what was  
6 going on?

7           A       I could briefly talk to them and  
8 try to get an understanding of what was going  
9 on, but -

10          Q       And you said that they were upset  
11 about what?

12          A       The individual who was actually  
13 driving the vehicle was in the club, so it was  
14 like it was drawn towards him a little bit.

15          Q       Okay. So, driving what vehicle?

16          A       The car that actually caused the  
17 accident of the two individuals who died.

18          Q       So, this person then was present in  
19 the club, a person who survived the crash was  
20 present in the club?

21          A       Yes.

22          Q       And this person was believed to be

1 driving the car that the two people died in?

2 A Yes.

3 Q And you said that that upset  
4 somebody?

5 A That upset - yes.

6 Q Okay. And what upset - what was it  
7 that upset them about this person being there?

8 A I guess because of the accident and  
9 them losing their friend.

10 Q Did anyone tell you that they  
11 blamed that person for the -

12 MR. ADAMS: Objection; leading.

13 CHAIRPERSON MILLER: Sustained.

14 BY MR. LeFANDE:

15 Q Did anyone tell you why they were  
16 upset with the person -

17 MR. ADAMS: Objection; leading.

18 MR. LeFANDE: That is about as  
19 unleading a question as you -

20 MR. ADAMS: It says did the person,  
21 that calls for a yes or no answer.

22 MR. LeFANDE: No, I asked did

1 someone say why.

2 MR. ADAMS: Did someone say why?  
3 Still it's asking for a yes or a no answer.

4 CHAIRPERSON MILLER: Rephrase the  
5 question.

6 BY MR. LeFANDE:

7 Q Did you come to learn why they were  
8 upset with the person?

9 A Yes.

10 BY MR. LeFANDE:

11 Q And what was that?

12 A They were pretty much still  
13 emotional about the death, and then they was  
14 also emotional that he was alive and their  
15 friend wasn't.

16 Q Okay. So, they were upset with the  
17 presence of -

18 A Of him being in the club.

19 Q And what happened then?

20 A After talking to a couple of the  
21 gentlemen that was inside of the club, I also  
22 noticed that my security team was pushing out

1 a group of individuals, so I followed out to  
2 find out what was going on.

3 Q And what did you find out was going  
4 on?

5 A Exactly the same thing.

6 Q So, these groups of persons who  
7 were pushing amongst each other, did you find  
8 out why they were pushing each other?

9 A They was all from the same  
10 neighborhood. They was just emotional about  
11 what was going on.

12 Q So, they were emotional, but these  
13 were people who were together?

14 A Yes.

15 Q Okay. So, was there actually any  
16 fight going on between them?

17 A No, no fights.

18 Q So, what was the reason for this --  
19 did you understand was the reason for them,  
20 what seemed to be pushing between them?

21 A No, I did not.

22 Q You don't know. Okay. But they were

1 amongst -

2 A Each other.

3 Q Each other.

4 A Yes.

5 Q So, they were - was there any time  
6 that there were different groups fighting  
7 against each other?

8 A No.

9 Q Okay. So, what happened - these  
10 people then were taken outside, the group?

11 A Yes.

12 Q And you had an opportunity to speak  
13 with them?

14 A Yes, I had an opportunity to hold  
15 up a group of individuals that was standing  
16 outside to talk to them to find out exactly  
17 what was going on. At that particular time, I  
18 noticed that the - that some more individuals  
19 was leaving out, so I didn't want them to get  
20 involved with them leaving out, so I pushed  
21 the people that I was talking to up against  
22 the bus so I can finish talking to them to get

1       them calm so I can let them out the gate.

2               Q       So, these emotions are directed at  
3       these events that transpired a week earlier.

4               MR. ADAMS: Objection; leading  
5       question, calls for the answer. And, secondly,  
6       calls for speculation.

7               MR. LeFANDE: Actually, I'm -

8               CHAIRPERSON MILLER: Sustained.

9               MR. LeFANDE:   - restating his  
10       prior testimony, so I do believe that's  
11       appropriate. He's already testified to these  
12       things, and I'm simply making sure that I  
13       understand his prior testimony. And that's not  
14       at all leading. He's already testified to the  
15       fact that this car crash took place a week  
16       earlier, that the persons that were involved  
17       in the pushing were actually amongst each -  
18       friends amongst each other who were overcome  
19       with the grief of an event that occurred a  
20       week earlier.

21               MR. ADAMS: Frankly -

22               CHAIRPERSON MILLER: So, what -

1                   MR. ADAMS:    - counsel has led that  
2 testimony, and -

3                   CHAIRPERSON MILLER: So, you've  
4 already heard the testimony so what's the  
5 question?

6                   MR. LeFANDE: I'm just making sure  
7 I understand what he said, and that the Board  
8 understands what's being testified to.

9                   CHAIRPERSON MILLER: Okay. If the  
10 Board doesn't understand, the Board can -

11                   MR. LeFANDE: The Board doesn't  
12 understand it?

13                   CHAIRPERSON MILLER: What? No, I  
14 said if the Board doesn't understand  
15 something, we will ask it, so I'm not sure.  
16 You just repeated something that I think is  
17 pretty understandable.

18                   MR. ADAMS: Again, and also again  
19 there's a call for speculation, as well as  
20 leading nature of this. And, frankly, the  
21 majority of the questions have been asked.

22                   MR. LeFANDE: The testimony was

1 previously heard. I will withdraw the  
2 question.

3 BY MR. LeFANDE:

4 Q Based upon your conversations with  
5 the persons in the group, did you see any  
6 reason to call the police at this point?

7 A No.

8 Q And why is that?

9 A Everybody was calm. Everybody was  
10 still - there were still individuals who had  
11 high emotions but the individuals that I was  
12 talking to was - they were still calm.

13 Q And in - what was it that - how  
14 these persons expressed these high emotions  
15 that you mentioned? What were they doing?

16 A When I was first coming out the  
17 door was an individual pulling off his shirt.  
18 I don't know if he was trying to reenter the  
19 club or not, but he was just pulling off his  
20 shirt, so I immediately started talking to  
21 him.

22 Q What other things did you observe

1 about people expressing these high emotions  
2 about what had happened?

3 A There was a couple of young ladies  
4 out there screaming, and just upset.

5 Q Upset about what?

6 A Upset that the driver was still in  
7 the club, that he -

8 Q They were upset.

9 A Yes, that he even came to the club.

10 Q That he had come to the club.

11 A Yes.

12 Q And we - did you have - was -  
13 did you observe anyone running back and forth  
14 in this area at this time?

15 MR. ADAMS: Objection; leading.

16 CHAIRPERSON MILLER: Rephrase your  
17 question. Sustained.

18 MR. LeFANDE: I asked whether or not  
19 someone was running in this area during this  
20 time. I don't know. That does not elicit an  
21 answer one way or the other. That's not formed  
22 to elicit an answer one way or the other,

1 which is your definition of a leading  
2 question. I can't ask him -

3 CHAIRPERSON MILLER: Okay. All  
4 right.

5 MR. LeFANDE: Either it's a yes or  
6 no. Asking a yes or no question with a yes or  
7 no answer, it's not a leading question.

8 CHAIRPERSON MILLER: For the benefit  
9 of the Board, now what area are you referring  
10 to?

11 MR. LeFANDE: Where this group of  
12 people was that he was speaking to.

13 CHAIRPERSON MILLER: Okay. You can  
14 ask him that.

15 BY MR. LeFANDE:

16 Q While you were speaking to these  
17 people and you said you observed persons with  
18 high emotions, were any of them running back  
19 and forth in this area while you were speaking  
20 to them?

21 A There was a - I did notice that  
22 they was moving a little quickly towards the

1 gate.

2 Q Okay, thank you.

3 CHAIRPERSON MILLER: I'm sorry, what  
4 did you say, a little what?

5 THE WITNESS: They was moving  
6 quickly towards the gate.

7 CHAIRPERSON MILLER: Moving quickly  
8 to the gate. Okay.

9 BY MR. LeFANDE:

10 Q And did you tell them to leave at  
11 any point?

12 A No.

13 Q Okay. So, after you spoke to them  
14 what happened?

15 A After I spoke to them, the group  
16 that I was walking with, we started walking  
17 towards the gate. At that time we were say, I  
18 don't know exactly how far we was towards the  
19 gate before we actually got towards - to the  
20 exit of the gate. I heard shots fired.

21 Q You heard shots, and where did you  
22 hear the shots coming from?

1           A        They was coming from outside the  
2 gate area. I couldn't tell you exactly where.

3           Q        And where were you standing at this  
4 point when you heard the shots?

5           A        I was still quite far away from the  
6 exit. I wasn't that close to the exit.

7           Q        The exit meaning the front gate, or  
8 the front door?

9           A        At the front gate. The front gate.

10          Q        Okay. How - just roughly how far  
11 away do you think you were from the front  
12 gate?

13          A        Around 15 feet.

14          Q        Fifteen feet. All right. And what  
15 happened once you heard the shots?

16          A        Once we heard the shots we tried to  
17 contain the people that was still inside the  
18 gate so nobody else - so nobody would get  
19 hurt. I walked outside the gate to see was any  
20 of my people outside the gate, and two of my  
21 security officers still was outside the gate.

22          Q        So, you said that you would not

1 permit anyone to leave -

2 A No.

3 Q - outside the front gate at this  
4 point?

5 A No.

6 Q And you were concerned that they  
7 would get hurt?

8 A Yes.

9 Q Okay. What happened then?

10 A I notified the person at the front  
11 door not to let anybody leave. They were still  
12 playing music also, but it was still almost  
13 about that time for them to leave.

14 Q So, the persons who were still  
15 inside the club were not allowed out into the  
16 fenced in area either.

17 A No.

18 Q Okay. And then what happened?

19 A And then I went back out to the  
20 gate, and seen a - noticed that an individual  
21 was walking back. That's when somebody let me  
22 know that he was shot, told me to call for

1 help. I didn't have my phone on me, so I went  
2 back inside the club to try to find an  
3 individual with a phone, then let them know,  
4 then also let Will know that somebody was shot  
5 outside the club.

6 Q Did you find Will?

7 A Yes, I did.

8 Q And what did Will do?

9 A Right after I told Will, I went  
10 back outside. Probably like - probably not  
11 even that long, Will was coming behind me with  
12 his emergency bag.

13 Q And what did Will do?

14 A He attended to the young man that  
15 was sitting in front of the gate.

16 Q He was outside the gate?

17 A Yes, he was.

18 Q Okay. And you say attended to him,  
19 what do you mean by that?

20 A I guess what an EMS person do, you  
21 know.

22 Q He gave him - EMS you mean

1       Emergency Medical Services?

2               A       Yes.

3               Q       Okay. So, what - he was giving him  
4       medical treatment. Is that what you mean?

5               A       Yes.

6               Q       Okay, thank you. And what happened  
7       then?

8               A       After that we still trying to find  
9       out exactly who else had been shot, so I sent  
10      a couple of my security officers to find out  
11      exactly how many people were shot, and Will  
12      was -

13              Q       Where did you send them?

14              A       I sent three up by Queens Chapel.  
15      I checked the alleyway because they said a  
16      young lady was shot and she went to a car, so  
17      I checked the little alleyway that's adjacent  
18      to the club.

19              Q       So, you sent people out to where  
20      the shooting had happened?

21              A       Yes.

22              Q       And made them look for victims?

1           A        Yes.

2           Q        Okay. And what happened?

3           A        After coming back they let me know  
4 what was going on, so they let Will know  
5 exactly there was another one, another person,  
6 female that was shot in the leg. I still  
7 couldn't find the individual that they was  
8 saying, there was another female that was  
9 shot. I think they said she had already pulled  
10 off.

11          Q        And then what?

12          A        That's when the DC Police came, and  
13 EMS, so they pretty much took over from then.

14          Q        And what did you do once the police  
15 and the EMS arrived?

16          A        We went inside the club. I went  
17 inside the club to let everybody - to let my  
18 security know what was going on, and to let  
19 the people leave from the club so they can  
20 disperse.

21          Q        So, the people were permitted to  
22 leave the club once -

1           A       After we knew everything was safe.

2           Q       After you - after the police were  
3 there and the EMS was there, you thought it  
4 was safe.

5           A       Yes.

6           Q       That's why you let them go. Okay.  
7 And did you have an opportunity to talk to any  
8 of the police that night?

9           A       No.

10          Q       Has anybody from the police  
11 department contacted you about what happened?

12          A       No.

13          Q       Okay. Have you learned anything  
14 about the relationship of the shooting to  
15 anything that happened inside the club that  
16 night?

17          A       No.

18                   MR. LeFANDE: I have no further  
19 questions.

20                   CHAIRPERSON MILLER: Okay, thank  
21 you. Mr. Adams.

22                   MR. ADAMS: How are you doing, Mr.

1 Jones?

2 THE WITNESS: How are you doing?

3 MR. ADAMS: All right.

4 CROSS-EXAMINATION

5 BY MR. ADAMS:

6 Q You were asked a lot of questions  
7 regarding everything that occurred, and I know  
8 a lot happened. And I think the Board  
9 understands a lot happened that night. So, I  
10 want to confirm a couple of facts with you.  
11 Okay.

12 So, the event that was at the  
13 establishment was a fund raiser. Correct?

14 A Yes.

15 Q All right. So, there was a band  
16 playing for this fund raiser. Correct?

17 A Yes.

18 Q Okay. So, in - I think more or  
19 less you stated that there was just a lot of  
20 people there.

21 A It was crowded.

22 Q The place was fairly full?

1           A       Yes.

2           Q       So, the first incident occurred,  
3 and in terms of someone being ejected out of  
4 the establishment. And this incident was a  
5 situation where, I just want to make sure, I'm  
6 confirming this, where the person who was let  
7 out was let out because he pushed a female in  
8 the face.

9           A       Yes.

10          Q       All right. And based upon your  
11 discussion, this had nothing to do with, I  
12 guess, the fund raiser or anything regarding  
13 the matter, just simply someone pushing  
14 someone in the face. Correct?

15          A       Yes, sir.

16          Q       All right. So, you're saying in  
17 this - and this happened when, around 1:00 or  
18 so?

19          A       Yes, probably a little bit - a  
20 little - yes, about 1, probably like 1:30,  
21 1:40, something like that.

22          Q       Okay. So, at that point - at this

1 point you interviewed both sides of the  
2 incident. Correct?

3 A Yes.

4 Q And were both sides together at the  
5 time that you interviewed them?

6 A No.

7 Q They weren't. Okay. So, where was  
8 the second person?

9 A The first person was standing in  
10 between the cars and the steps where I can  
11 talk to him privately. The second person was  
12 with another security officer that was outside  
13 who was also searching, and I told him to grab  
14 him and start walking him towards the gate.

15 Q Okay. And so based upon what  
16 occurred, you said you took that person to the  
17 front.

18 A Yes.

19 Q Okay. Now, the second point - the  
20 second issue happened, I guess around the time  
21 of closing. Correct?

22 A Yes.

1           Q       All right. Now, you stated that  
2 what you observed in the club was that there  
3 was too much pushing inside the club. Correct?

4           A       Yes, I did, sir.

5           Q       All right. So, in terms of pushing,  
6 someone was physically pushing each other.  
7 Correct?

8           A       Not physically pushing each other.  
9 When there's a large crowd like that, all you  
10 normally see, especially from outside  
11 standpoint is a group of individuals moving a  
12 little bit faster than the music itself. So,  
13 we just responded to that area.

14          Q       Okay. So, it was an area but for  
15 back - so, to characterize this, they're not  
16 moving in rhythm to the music.

17          A       Yes.

18          Q       Just completely arrhythmic.

19          A       Yes.

20          Q       Okay, so that - no, that's fine.  
21 And that is an indication that there's a  
22 problem.

1           A       Yes.

2           Q       Okay. All right. So, at that point  
3 it was about 2:45 and the lights were already  
4 up. Correct?

5           A       Yes, sir.

6           Q       Okay. So, and you're finding out  
7 and getting to that core area, you did - I  
8 mean, you did at some point ascertain that  
9 there was some form of pushing in between that  
10 area, there was some disturbance amongst that  
11 group. Correct?

12          A       Yes.

13          Q       Okay. And you were - during your  
14 direct you were discussing why that was.  
15 Correct? Based upon what you learned.

16          A       Yes.

17          Q       Okay. Now, at some point you are  
18 aware that a person was let out. Correct?

19          A       A group was, correct.

20          Q       So, you're saying that no  
21 individual was let out at any point, it was  
22 just a full group was let out?

1           A       Yes.

2           Q       Okay. And so, in terms of - so, a  
3 full group was let out by how many members of  
4 security?

5           A       I'd say there was - I guess 15 was  
6 in there at the time. I think it was like  
7 between five and seven.

8           Q       Okay, five and seven members led a  
9 group out, and the amount of members in the  
10 group were how many?

11          A       At that time, when I got outside,  
12 I couldn't notice - I didn't even notice them  
13 pushing them out until I actually turned  
14 around and noticed the door was - that they  
15 was leaving towards the door. But when I got  
16 outside I'd say it was about 15, probably a  
17 little less than that.

18          Q       So, now at some point - so, when  
19 you were ascertaining that people were upset  
20 about the accident that was inside of the club  
21 that you learned that?

22          A       I learned that inside and outside.

1           Q       Inside and outside. Okay. So, were  
2 people just yelling, or what was going on? How  
3 did you learn that?

4           A       Well, inside they wasn't yelling.  
5 I just walked up to a couple of individuals,  
6 just pretty much put my arm around them  
7 because the music is so loud so, you know, you  
8 put your arm around them so you can talk to  
9 them and find out what was going on. They were  
10 saying look, everything is fine. You just -  
11 we're just a little emotional right now. And  
12 then that's when I left from talking to them.  
13 Then I noticed that the door, what was going  
14 on at the door. So, when I got outside to find  
15 out what was going on they was a little bit  
16 more verbal on what was going on.

17           Q       So, people outside were more  
18 verbal.

19           A       Yes.

20           Q       Okay. So, now the person who they  
21 were upset with, that person was identified to  
22 you?

1           A       Yes.

2           Q       Okay. And the person that they were  
3       upset with, now based upon your direct  
4       testimony you didn't say - in your direct  
5       testimony you didn't tell us whether or not he  
6       remained in the establishment. Did he remain  
7       in the establishment the whole time?

8           A       Yes, he did.

9           Q       Okay, so he never came out.

10          A       No, he never came out.

11          Q       Okay. So, when people were verbal  
12       at the front door area, your testimony was  
13       that they were speaking with each other, but  
14       they were not confronting each other. Correct?

15          A       Yes.

16          Q       So, nobody was confronting each  
17       other. All right. So, at some point - now, in  
18       your direct testimony - and when you were  
19       outside did you speak with any - sorry. I  
20       will ask you, did you speak with anyone  
21       individually while this group was outside?

22          A       No, I didn't speak to any one

1 individual person. I spoke to the group  
2 itself.

3 Q So, at some - you stated that you  
4 pushed them towards buses that were in the  
5 alley. Correct?

6 A Yes.

7 Q All right. And then from that point  
8 they just merely walked towards the  
9 management. Correct?

10 A It was another - there were some  
11 more people coming out behind us, so that was  
12 the reason why I was pushing them up towards  
13 the gate so I can make sure there wasn't going  
14 to be no altercation or anything else, because  
15 I wasn't for sure about the group that was  
16 coming out.

17 Q Okay. So, when you're pushing  
18 people towards the front, it would be your  
19 testimony - and let me make sure I have your  
20 testimony right. While you're getting people  
21 out towards the entrance, at that point you  
22 hear a shooting. Correct?

1           A       Yes.

2           Q       Okay. So, people are going towards  
3 the entrance, did they just - they just  
4 remained inside of the perimeter at that  
5 point?

6           A       Yes, inside the gate.

7           Q       Okay. So, this little group of 10  
8 or 15 stayed there. All right. Now, get back  
9 to the beginning of your testimony. You talked  
10 about that, obviously, you received training  
11 from working in Corrections and Juvenile  
12 Detention. Correct?

13          A       Yes.

14          Q       And you state that part of your  
15 responsibilities to the establishment is to  
16 train the security personnel.

17          A       Yes.

18          Q       And according to your testimony  
19 they learn their duties based upon  
20 observation. Correct?

21          A       Yes. Most of them - the two - the  
22 one individual - one of the individuals that

1 I had outside searching, he's Military Police  
2 so -

3 Q Okay, so he's an MP but it's all  
4 but what you're saying is based on your  
5 observations.

6 A Yes.

7 Q Okay. And as being the head of  
8 security are you aware of the capacity of the  
9 establishment?

10 A The capacity?

11 Q Yes.

12 A Yes.

13 Q And how - what is the capacity?

14 A I think the capacity should be like  
15 I think 500 or so, I believe.

16 MR. ADAMS: All right. I have no  
17 further questions for Mr. Jones.

18 CHAIRPERSON MILLER: Okay. Are there  
19 Board questions? Mr. Short.

20 MR. SHORT: Yes, good afternoon.  
21 You've been working with the club for - Mr.  
22 Jones, Cornell Jones, you've been working for

1 four years there as head of security?

2 MR. JONES: Well, as -- yes, as head  
3 of security.

4 MR. SHORT: So, you got to know most  
5 of the reimbursable detail persons quite well.

6 MR. JONES: Oh, yes, some of them.

7 MR. SHORT: And that particular  
8 night, when or did anyone from your security  
9 detail call MPD?

10 MR. JONES: I don't know exactly who  
11 called, to be honest with you. Trying to get  
12 everybody else under control, I really didn't  
13 pay attention. I just let somebody know what  
14 was going on. I don't know exactly if it was  
15 from my staff, or if it was from the  
16 bartending staff who called. I don't know  
17 exactly who called.

18 MR. SHORT: Okay. In your training,  
19 can you describe what the word "assault"  
20 means?

21 MR. JONES: Assault?

22 MR. SHORT: Yes.

1 MR. JONES: Any individual that  
2 assaulted another person.

3 MR. SHORT: What is assault, though?  
4 What's the definition of assault?

5 MR. JONES: A definition? You could  
6 touch a person and that can be assault.

7 MR. SHORT: Unwanted touching.

8 MR. JONES: Unwanted touch.

9 MR. SHORT: So, smushing someone in  
10 the face, did that -

11 MR. JONES: Is unwanted touch.

12 MR. SHORT: Would you normally call  
13 the police with something like that in the  
14 club?

15 MR. JONES: No.

16 MR. SHORT: You handle it yourself.

17 MR. JONES: Yes, we handle it.

18 MR. SHORT: Okay. Do you know  
19 Sergeant Cropp?

20 MR. JONES: No.

21 MR. SHORT: Sergeant Rogers?

22 MR. JONES: No.

1 MR. SHORT: Sergeant Ferretti?

2 MR. JONES: No.

3 MR. SHORT: Okay. And I guess the  
4 last thing, I want just to try to find out is  
5 when you saw the unusual movement in the club,  
6 someone was not moving with the music, how  
7 many people would you say were involved in  
8 that non-musical movement?

9 MR. JONES: I couldn't give you a  
10 direct head count.

11 MR. SHORT: Pretty large group of  
12 them?

13 MR. JONES: Yes, it was pretty -

14 MR. SHORT: And your training kind  
15 of told you something was brewing?

16 MR. JONES: Yes.

17 MR. SHORT: Still no police  
18 assistance needed?

19 MR. JONES: No.

20 MR. SHORT: Is that normal for that  
21 club?

22 MR. JONES: Not for this - that's

1 for any club, I mean, any other club that I  
2 worked. If I notice that they moving like  
3 that, we just try to get over there quickly so  
4 a fight wouldn't break out, or if a fight is  
5 breaking out, we'll be there. I'm not calling  
6 the police. If it's necessary for us to call  
7 the police, we will, we do.

8 MR. SHORT: Thank you. I'd just  
9 really like to know how many people were  
10 ejected that night?

11 MR. JONES: It was just -

12 MR. SHORT: Two people?

13 MR. JONES: No, there was two people  
14 brought out. There was only one person ejected  
15 from the club.

16 MR. SHORT: All right, thank you. I  
17 have no further questions.

18 CHAIRPERSON MILLER: Okay. Others?  
19 I just have a few. So, I was wondering if you  
20 could tell me more about your weapon screening  
21 process. Could you tell me more about your  
22 weapon screening process?

1 MR. JONES: We physically hand  
2 search each individual. After doing our hand  
3 searching, they go through a metal detector to  
4 make sure we didn't miss anything.

5 CHAIRPERSON MILLER: Do you ever  
6 miss anything?

7 MR. JONES: No.

8 CHAIRPERSON MILLER: Never missed  
9 anything since you've been there.

10 MR. JONES: No.

11 CHAIRPERSON MILLER: Is it - is  
12 your - does sometimes the metal detector not  
13 work properly?

14 MR. JONES: No, the metal detector  
15 has always -

16 CHAIRPERSON MILLER: Has always  
17 worked. Okay. In your position, do you  
18 determine how much security is needed for  
19 certain nights?

20 MR. JONES: Certain, on certain  
21 events. Yes.

22 CHAIRPERSON MILLER: So, like this

1 event, did you determine how much is  
2 necessary?

3 MR. JONES: Ma'am, we were both  
4 there.

5 CHAIRPERSON MILLER: You and Will.

6 MR. JONES: Yes.

7 CHAIRPERSON MILLER: Okay. So, did  
8 you take into account the nature of the event?

9 MR. JONES: Yes, we did.

10 CHAIRPERSON MILLER: Okay. And the  
11 number of people you expected. Right. And did  
12 you get more people than you expected, or what  
13 you expected?

14 MR. JONES: It was pretty much the  
15 same.

16 CHAIRPERSON MILLER: Okay. I don't  
17 have any other questions.

18 MR. SHORT: Just have one more.

19 CHAIRPERSON MILLER: Okay, Mr.  
20 Short.

21 MR. SHORT: How many security  
22 personnel did you have working that night?

1 MR. JONES: Fifteen.

2 MR. SHORT: Fifteen.

3 MR. JONES: I had 15 working with  
4 me, and there was also a total of three extra  
5 that was working with - working along with me  
6 that I didn't pay, but Will also hired.

7 MR. SHORT: Three additional.

8 MR. JONES: Yes, so it was 18.

9 MR. SHORT: Eighteen. Where were  
10 they stationed?

11 MR. JONES: We had two at the front  
12 gate. It was four of us searching at the time.  
13 I had one individual at the door, and the rest  
14 of the security was maintaining the floor area  
15 of the club. So, I was back and forth in and  
16 out of the club, and also searching at the  
17 time.

18 MR. SHORT: Okay. And there was  
19 testimony that the lights came on at 2:45?

20 MR. JONES: 2:45.

21 MR. SHORT: How many security people  
22 were outside of the gate at 2:45?

1                   MR. JONES: It was only at the time  
2 when the lights came on, I normally bring my  
3 outside staff to break down the search area  
4 and bring them inside, so inside they had -  
5 it was 15.

6                   MR. SHORT: Okay. And then the -  
7 there was further testimony today that the  
8 shooting occurred somewhere around 2:50 or  
9 2:55.

10                  MR. JONES: Yes.

11                  MR. SHORT: And you were at the gate  
12 at that time.

13                  MR. JONES: I was standing - I was  
14 walking towards the gate, yes.

15                  MR. SHORT: No further questions.  
16 Thank you.

17                  CHAIRPERSON MILLER: Okay. I just  
18 have one other question. I think you testified  
19 that the person who was ejected was hanging  
20 around because he was waiting for his ride?

21                  MR. JONES: Yes.

22                  CHAIRPERSON MILLER: Do you know

1 where your patrons park?

2 MR. JONES: They park out in the  
3 alleys or on the street.

4 CHAIRPERSON MILLER: Along which  
5 street?

6 MR. JONES: Queens Chapel, New York  
7 Avenue, Bladensburg Road, they park where they  
8 can park to get access to the club.

9 CHAIRPERSON MILLER: Okay, thank  
10 you. All right. Questions on Board questions?

11 MR. LeFANDE: Nothing.

12 MR. ADAMS: I have no further  
13 questions.

14 CHAIRPERSON MILLER: Okay. Thank you  
15 very much.

16 MR. LeFANDE: May this witness be  
17 excused? We won't - we don't anticipate his  
18 testimony for anything else, and he may like  
19 to remain in the room.

20 CHAIRPERSON MILLER: I'm sorry.  
21 You're saying -

22 MR. LeFANDE: May the witness be

1       excused, and may he remain in the hearing  
2       room?

3                   CHAIRPERSON MILLER: Yes. Yes, he  
4       may, both.

5                   MR. LeFANDE: Since I don't think  
6       anybody is calling him again.

7                   CHAIRPERSON MILLER: Yes, you're  
8       excused, and you can remain.

9                   MR. LeFANDE: We have one more  
10      witness, and it will take considerably more  
11      time than the other two witnesses that we've  
12      offered. Do - what do we want to do for - in  
13      terms of trying to lay out a schedule?

14                  CHAIRPERSON MILLER: Okay. I think  
15      that we should break for lunch then so that  
16      everybody can give it their best attention.

17                  MR. LeFANDE: Not to put too fine a  
18      point on it, we were given a half hour during  
19      our last hearing, did not give us time to  
20      actually get our food and we didn't take -  
21      the Board didn't take the bench until about  
22      25 minutes later after the time we were asked

1 to return.

2 CHAIRPERSON MILLER: Okay.

3 MR. LeFANDE: If we could have an  
4 hour for lunch, I just -

5 CHAIRPERSON MILLER: Okay. Any  
6 objection?

7 MR. ADAMS: No objection. So, we're  
8 coming back 2:30?

9 CHAIRPERSON MILLER: We'll come back  
10 at 2:30.

11 MR. LeFANDE: And we have one more  
12 witness, and then I think just closing at that  
13 point.

14 CHAIRPERSON MILLER: You have one  
15 more witness. Right?

16 MR. LeFANDE: We have one witness  
17 and closing.

18 CHAIRPERSON MILLER: Right. Okay.

19 MR. LeFANDE: I think we'll get this  
20 wrapped up short order.

21 CHAIRPERSON MILLER: Good, thank  
22 you. Okay.

1 (Whereupon, the proceedings went  
2 off the record at 1:27 p.m. and went back on  
3 the record at 2:51 p.m.)

4 CHAIRPERSON MILLER: Okay. We're  
5 back on the agenda--I mean on the record, to  
6 continue the summary suspension hearing for  
7 The Scene, and where we left off is, I believe  
8 we have one more witness that we're going to  
9 hear from, the licensee.

10 MR. LeFANDE: Good afternoon, Madam  
11 Chair, Matthew Lefande for the Respondent,  
12 MPAC LLC, as our final witness we call to the  
13 stand the owner of MPAC, and proprietor of the  
14 establishment, Willie Blakeney.

15 CHAIRPERSON MILLER: Okay.  
16 Good afternoon.

17 MR. BLAKENEY: Good afternoon.

18 WHEREUPON,

19 WILLIAM BLAKENEY  
20 was called as a witness by Counsel for the  
21 Government, and after having been first duly  
22 sworn, was examined and testified as

1 follows:

2 DIRECT EXAMINATION

3 BY MR. LeFANDE:

4 Q Thank you, sir. Could you please  
5 state for the record your full legal name?

6 A Willie James Blakeney, Junior.

7 Q And sir, are you in fact the  
8 proprietor of the establishment which is the  
9 subject matter of a Summary Suspension Hearing  
10 for which we are here today?

11 A Yes, sir, I am.

12 Q Okay. And how long have you been  
13 involved with the establishment known as The  
14 Scene?

15 A Approximately six -- five -- five  
16 and a half years.

17 Q Now what are your duties in  
18 relation to the operation of that  
19 establishment?

20 A I'm the overall manager and  
21 operating owner.

22 Q And with regards to that, are you

1 responsible for the day-to-day operations of  
2 the establishment?

3 A Yes, sir, I am.

4 Q And does that include the security  
5 procedures for the establishment?

6 A Yes, sir.

7 Q Okay. Does that include accounting  
8 and procurement matters for the establishment?

9 A Yes, sir.

10 Q Okay. Were you working at the  
11 establishment on the morning of May 17th of  
12 this year?

13 A Yes, I was.

14 Q And what were you doing at the  
15 establishment on that morning?

16 A Actually overseeing the operations.

17 Q And you were physically present at  
18 the establishment?

19 A Yes, sir.

20 Q Okay. Thank you. And did there come  
21 to your attention, during the course of the  
22 early morning hours of May 17th, any incidents

1       which required the attention of the security  
2       personnel at that establishment?

3             A       Yes, sir.

4             Q       And could you describe for me, if  
5       you would, in chronological order, starting  
6       with the first incident, what that was.

7             A       The first incident was a brief  
8       altercation that two gentlemen were escorted  
9       out to the front of the establishment to  
10       determine what had taken place, to have them  
11       removed from the establishment and --

12            Q       Did you personally witness this  
13       altercation?

14            A       No, sir. I saw them as they were  
15       coming outside the door. I think I was  
16       actually in the gated area.

17            Q       So your first encounter with the  
18       persons that were the subject of this action  
19       by the security personnel was as they were  
20       coming out the front door; is that correct?

21            A       Yes. Yes, sir.

22            Q       Okay. Okay. And what did you

1 observe at that time?

2 A I observed two males that were  
3 separated by Security, that had been taken  
4 out. One was closer to the gate and one was  
5 actually near the steps.

6 Q And did you then become involved in  
7 what the security personnel were doing at that  
8 point?

9 A Yes, sir.

10 Q And what was the nature of your  
11 involvement with the security personnel's  
12 action?

13 A I wanted to know why these two  
14 gentlemen were escorted out of the venue.

15 Q And did there come a time that you  
16 learned as to why they were escorted out?

17 A Yes, sir.

18 Q And what was the reason that you  
19 learned of?

20 A One of the gentlemen has smooshed  
21 a female, took his open hand and--and pushed  
22 her in the face, and her brother, who was also

1 involved, had come to her rescue, and  
2 defending her.

3 Q Did you have an opportunity to  
4 speak with any of the patrons that were  
5 directly involved in this?

6 A Yes, sir.

7 Q And who did you speak with?

8 A I spoke to the gentleman who was  
9 actually the aggressor, who was also escorted  
10 outside of the gate.

11 Q And at what point did you have the  
12 opportunity to speak with him?

13 A Close towards the closing of the  
14 club.

15 Q Okay. Was this at the time that he  
16 was initially taken out?

17 A Not the time when he was initially  
18 taken out.

19 Q Okay. Did you have the opportunity  
20 to speak to any of the -- any of the direct  
21 participant patrons, at the time that they  
22 were initially taken out?

1           A       There were only two.

2           Q       Did you have a chance to speak with  
3 either one of them at that time?

4           A       During the time that they were  
5 actually --

6           Q       When they were taken outside,  
7 before they --

8           A       No, sir.

9           Q       Okay. And how did you come to--if  
10 you didn't speak with them, how was it that  
11 you came to learn the nature of what  
12 transpired, that caused the security  
13 personnel's actions to remove them?

14          A       I actually asked Cornell Jones, why  
15 were they being escorted out.

16          Q       And what did Cornell Jones say to  
17 you?

18          A       Cornell told me that the gentleman  
19 who was being put outside the gate had  
20 smooshed the young lady and her brother was  
21 coming to her defense. And I told him okay,  
22 make sure that--you know--that guy doesn't

1       come back in. You know, I'll have a talk with  
2       him later.

3               Q       When you refer to that guy, to whom  
4       are you referring?

5               A       I'm speaking to the smoosher, the--

6               Q       The smoosher--

7               A       Yes.

8               Q       --as opposed to the smooshee; is  
9       that correct?

10              A       Smooshee. Smoosh--

11              Q       The smooshee being the female.

12              A       Oh, no. I--I--

13              Q       Okay.

14              A       I did not speak to her.

15              Q       And so you learned from Cornell  
16       that the smoosher was being removed from the  
17       establishment separate from the other persons  
18       involved?

19              A       Yes.

20              Q       Okay. At this time, did you have an  
21       opportunity to observe those persons outside  
22       of the club? The smoosher?

1           A       Yes. Within the fence area and the-

2       -

3           Q       And you had an opportunity to  
4 observe him. What did his demeanor appear to  
5 be?

6           A       He was cool.

7           Q       He was cool.

8           A       Yeah.

9           Q       Did you observe him arguing with  
10 anyone?

11          A       No, sir.

12          Q       Did you observe him fighting with  
13 anyone?

14          A       No, sir.

15          Q       Okay. Did he appear to be injured  
16 to you?

17          A       No, sir.

18          Q       Did there come a time that anyone  
19 asked that the police be called about him?

20          A       No, sir.

21          Q       Did there come a time that anyone  
22 asked that an ambulance be called about this

1       smoosher?

2               A       No, sir.

3               Q       Okay. Did you receive any  
4 information about the smoshee, and the  
5 smoshee's brother? Did Cornell speak to you  
6 anything about them?

7               A       The only thing he said is that he  
8 was thinking about letting the--the brother  
9 back in because he really didn't do anything.

10              Q       And did you have an--did you have  
11 an opinion about this at that point?

12              A       Yes.

13              Q       And what was that?

14              A       My opinion was to--we had quite a  
15 few people there, and if this guy is smooshing  
16 a female, it was--it was just not tolerated.

17              Q       As to the brother who Cornell  
18 wanted to leave, inside of the establishment,  
19 but returned to the establishment--what was  
20 your opinion about that?

21              A       I told him as long as he was cool,  
22 I had no problems with this guy, then I didn't

1 have no problem.

2 Q Did you have an opportunity to  
3 observe the demeanor of the brother?

4 A Yes.

5 Q And what did his demeanor appear to  
6 you to be?

7 A After this guy was put out of the--  
8 the venue, he was pretty relaxed. He was--he  
9 was okay.

10 Q Was he argumentative with anyone?

11 A No, sir. He wasn't.

12 Q Was he combative with anyone?

13 A No, sir.

14 Q Was he assaultive with anyone?

15 A No, sir.

16 Q Did he appear to be injured?

17 A No, sir.

18 Q Did you have an opportunity to  
19 speak to him?

20 A No, sir.

21 Q Did there come a time that you  
22 learned that he wished to call the police

1 about the smoosher?

2 A No, sir.

3 Q Okay. Did you have an opportunity  
4 to speak to the sister, the smooshee?

5 A No, sir.

6 Q Okay. And did there come a time  
7 that you learned about her position as to  
8 calling the police on the smoosher?

9 A No, sir.

10 Q Okay. Once the decision was made  
11 to--I'm sorry. Was the sister, the smooshee,  
12 physically present outside in the fenced-in  
13 area at this time?

14 A You say within the fenced-in--

15 Q Was she outside of the  
16 establishment but inside the fence at this  
17 point?

18 A No. She never--she never exit--

19 Q She never came out?

20 A No, sir.

21 Q Then only the brother was taken  
22 outside?

1           A       Yes.

2           Q       Okay. Once the decision was made to  
3 let the brother remain in the establishment,  
4 what happened with him?

5           A       With the brother?

6           Q       Right.

7           A       He was allowed to go back with his  
8 sister.

9           Q       So he went back inside the  
10 establishment?

11          A       Yes. He went back. I mean, he was  
12 detained, actually, out front for a while.

13          Q       Okay. But was eventually allowed  
14 back inside?

15          A       Yes, sir.

16          Q       And did you come to learn, at any  
17 time, that he had caused any other trouble  
18 within the establishment that evening?

19          A       No, sir.

20          Q       Okay. And did there--what happened  
21 to the smoosher?

22          A       The smoosher was actually placed

1 outside the fence, and that's where he  
2 remained, back and forth, on Adams--on Adams  
3 Place.

4 Q So how did he come to be outside  
5 the fenced-in area?

6 A He was escorted out by Security.

7 Q And once escorted out, you say that  
8 he remained outside the fenced-in area for  
9 some time?

10 A Yes. He actually remained on the  
11 street.

12 Q And did you have an opportunity to  
13 observe his demeanor at the time that he was  
14 outside on the street?

15 A Yes, sir.

16 Q And what did his demeanor appear to  
17 you to be?

18 A Well, I actually approached him  
19 because I noticed he was still hanging out in  
20 close proximity of the fence.

21 Q And did you have an opportunity to  
22 speak with him at that time?

1           A       Yes, sir.

2           Q       And what did you speak to him  
3 about?

4           A       About the incident that had taken  
5 place earlier.

6           Q       And what did the smoosher have to  
7 say about the incident that took place  
8 earlier?

9           A       Well, he told me he was cool, he  
10 was cool with it. He--you know, he know he was  
11 wrong. But he was just waiting--waiting on it.

12          Q       When you say cool with it, what is  
13 it that you're referring to?

14          A       Speaking of his eviction from the  
15 club.

16          Q       So he was cool with being removed  
17 from the club?

18          A       Yes.

19          Q       Okay. Did he say anything to you,  
20 further, about what had transpired inside the  
21 club?

22          A       Oh, he told me he shouldn't have

1 put his hands on her. He know he shouldn't  
2 have put his hands on her.

3 Q Okay.

4 A And--and I--I did go into detail  
5 and--and tell him that, you know, this was a  
6 fundraiser for one a his buddies, which I  
7 noticed he was wearing the shirt of--

8 Q He was wearing the shirt that was  
9 referred to earlier, which was memorializing  
10 Mituka Seems (phonetic), which was the subject  
11 matter of this--this--

12 A Yes.

13 Q Okay.

14 A Yes.

15 Q And what did he say, if anything,  
16 about his continued or prolonged presence  
17 outside the gate at the--at the front of the  
18 establishment?

19 A Well, he--he asked me if he could  
20 come back in, he would be--you know--or he--he  
21 didn't have a problem with the guy. And I told  
22 him no, because, you know, because of the

1 incident, the disturbance he caused, he--he  
2 wasn't going to be allowed back in.

3 Q And how did he respond to his,  
4 again, being denied reentry in to the  
5 establishment?

6 A He was--he was cool. He's--

7 Q He was cool?

8 A He's--he's just hanging out.

9 Q Okay. Did he make any other further  
10 request of you at that time?

11 A No, sir.

12 Q Okay. What did you do upon finish  
13 speaking to him outside the gate?

14 A I actually walked back inside.

15 Q And where did you go?

16 A I kind of walked in, just to get a-  
17 -a visual.

18 Q Walked through what, sir?

19 A Walked through the club.

20 Q So you went--returned inside of the  
21 club, and you perambulated about the club; is  
22 that correct?

1           A       Yes.

2           Q       Okay. And what did you see?

3           A       Just still patrons--

4           Q       About what time would this have  
5 been?

6           A       This was approximately close to  
7 2:00 a.m.

8           Q       Okay. And did you observe any  
9 problems at that time inside of the club?

10          A       No, sir.

11          Q       Okay. What would have been the next  
12 incident that would have--was brought to your  
13 attention with regards to actions taken by the  
14 Security personnel of the establishment?

15          A       I think approximately 2:45 a.m.

16          Q       And what happened at that time?

17          A       This was a large group that was  
18 being escorted out front by Security.

19          Q       And did you personally observe the  
20 large group being escorted outside by  
21 Security?

22          A       Yes, sir.

1           Q       Okay. And where were you standing  
2           at the time that you observed this?

3           A       I think I was standing between the  
4           two bars.

5           Q       Inside--

6           A       Inside. Inside.

7           Q       Inside the establishment. And upon  
8           observing the group being removed from the  
9           establishment, what did you do?

10          A       I actually walked outside to find  
11          out exactly what the disturbance was about.

12          Q       And did there come a time that you  
13          learned about what the disturbance was about?

14          A       Yes, sir.

15          Q       And how did that occur?

16          A       I actually went to Cornell Jones  
17          and I asked him what was going on.

18          Q       And what did Cornell Jones say to  
19          you?

20          A       He told me that this was one big  
21          family, that they were a little upset that the  
22          driver of the vehicle from the accident that

1 had occurred. They were upset with the--with  
2 the driver being present.

3 MR. ADAMS: Objection. Double--  
4 double hearsay. The--Mr. Jones was already  
5 here at this point. Through this witness will  
6 be a second level hearsay.

7 MR. LeFANDE: Under the  
8 Administrative Procedures Act, we certainly  
9 have relaxed standards of evidence. However,  
10 even under the stringent standards of civil  
11 litigation or criminal litigation, under the  
12 District of Columbia rules of evidence,  
13 information received by the witness as to how  
14 he formed his opinions, and what actions he  
15 took based on the information he received, is  
16 certainly permissible.

17 There is nothing within this  
18 testimony that is being offered as to the  
19 double hearsay. As to the truth of the matter  
20 asserted, Mr. Blakeney is reciting back the  
21 information which he received, upon which he  
22 formed his decisions as to what security

1 procedures must be implemented.

2 There is nothing in what the orator  
3 stated that is now being posited to the Board  
4 as being truthful. It's simply what the  
5 witness has learned and what his impression  
6 was, to form his decisions as to how to  
7 proceed.

8 CHAIRPERSON MILLER: Okay.  
9 Overruled. You can answer the question.

10 BY MR. LeFANDE:

11 Q You stated that--you were in the  
12 process of telling us about the nature of the  
13 group, and how these folks were related to one  
14 another.

15 A Yes, sir. They--they were--

16 Q Proceed.

17 A He told me that they were all part  
18 of the family of one of--the decedent, and--  
19 and they were upset that the driver actually  
20 showed up to the memorial.

21 Q So in this instance, then, was  
22 there any altercation between the driver and

1 this group?

2 A No. There wasn't.

3 Q Instead, there were members of the  
4 group who were being upset about his presence?

5 MR. ADAMS: Objection. Leading.

6 MR. LeFANDE: I believe I'm  
7 restating what he just testified to.

8 CHAIRPERSON MILLER: Overruled. Go  
9 ahead.

10 BY MR. LeFANDE:

11 Q And that the interactions that were  
12 observed by the Security personnel were in  
13 fact interactions amongst that group?

14 A Yes. I looked at it as family  
15 trying to detain family.

16 Q Restrain emotional outbursts?

17 A Emotional outbursts and--

18 Q So in this instance, then,  
19 following your own security procedures, there  
20 was no conflicting groups to separate in this  
21 instance?

22 MR. ADAMS: Objection. Leading.

1 THE WITNESS: No, sir.

2 MR. ADAMS: Objection. Leading.

3 CHAIRPERSON MILLER: Sustained.

4 BY MR. LeFANDE:

5 Q Upon the large group being removed  
6 from the establishment, what transpired once  
7 they were outside, in the fenced area?

8 A Once they were outside, Security  
9 tried to get everyone to calm down. Again,  
10 this is close to closing. The lights were on.  
11 People were exiting. And from my assumption,  
12 I just thought they all decided to leave,  
13 since the majority of the group was already  
14 outside.

15 Q Were there any conflicting parties  
16 that needed to be separated at this point?

17 A No, sir.

18 Q Okay. While they're in the fenced-  
19 in area, did people continue to be upset?

20 A At--at one point they were a little  
21 hyper, and this is during the initial outburst  
22 where they were escorted out front, down the

1 steps.

2 Q And could you describe the  
3 mannerisms of those persons who were being  
4 upset in the fenced-in area, as you've just  
5 mentioned them.

6 A They didn't appear to be actually  
7 disrespectful at any time, or aggressive  
8 towards anyone from Security, or during the  
9 exit.

10 Q Is there anything in their  
11 mannerisms that you observed, that someone--  
12 the outside observer might observe to be  
13 aggressive?

14 A No, sir. I mean, once they got  
15 outside into some fresh air, they started to  
16 really calm down.

17 Q We had a witness testify that a man  
18 removed his shirt at this point. Do you recall  
19 that?

20 A I recall--I recall the testimony  
21 and I recall the--

22 Q If you don't have independent--do

1       you have an independent recollection of that  
2       occurring?

3             A       No. No, I don't.

4             Q       Okay. Thank you. And after they  
5       were outside, you said that they decided to  
6       leave as a group?

7             A       Yes.

8             Q       Okay. And what happened then?

9             A       Upon them leaving, they were  
10       exiting the fenced-in area onto Adams Place,  
11       and there were--there was another group of  
12       people, approximately three to four guys that  
13       were there on the street, that they actually  
14       merged the two groups to head towards Queens  
15       Chapel Road.

16            Q       An when you say that they merged,  
17       did they appear to know one another?

18            A       Yes.

19            Q       Were they addressing one another?

20            A       You say were they addressing?

21            Q       Or did they appear to be speaking  
22       to one another, or acknowledging one another?

1       What made you think that they were--they knew  
2       each other?

3           A       Well, because they all walked into  
4       one big group together, walking up Adams Place  
5       towards Queens Chapel Road.

6           Q       And at that point, did that merging  
7       seem amicable?

8           A       No, sir.

9           Q       Were they fighting with one  
10      another?

11          A       Not at--not at the point that I--I  
12      observed.

13          Q       You did not observe them fighting  
14      with one another?

15          A       No, sir.

16          Q       They were--were they unfriendly to  
17      one another?

18          A       No, sir.

19          Q       Okay.

20          A       Not what I observed.

21          Q       Okay. Very good. So they merged  
22      together and then they began walking up

1 towards Queens Chapel Road. What happened--

2 A Yeah, at this--at this point they--  
3 they were out of my view.

4 Q And where were you standing at this  
5 time?

6 A I was probably midway of the  
7 driveway between the front gate and the door.

8 Q So this would be midway in the  
9 fenced-in area?

10 A Yes.

11 Q Okay. Is this where the buses are  
12 that--

13 A Yes.

14 Q --that was previously described?

15 A Yes, sir.

16 Q And what are you doing at that  
17 moment, when you were midway between them?  
18 What are you--what are you doing? Are you  
19 walking?

20 A I'm just standing there. I'm just  
21 standing, kind a observing people as they're  
22 exiting the club.

1 Q So you're looking in their  
2 direction?

3 A Well, not in their--not in the  
4 people who were already outside the gate,  
5 because at that point they were beyond the  
6 gate where--

7 Q They had passed--

8 A --I couldn't see past the building.

9 Q Okay. But you're still looking in  
10 that direction--

11 A No. I'm looking at the door, people  
12 that are exiting from the door because--

13 Q So you're looking in the opposite?

14 A Yes.

15 Q Okay. And what happens then?

16 A I hear some shots.

17 Q Some shots?

18 A Yes.

19 Q What do you mean by shots?

20 A Gunfire.

21 Q You hear gunfire?

22 A Yes.

1           Q       And from what direction is the  
2       gunfire heard?

3           A       It was hard to tell but I assumed  
4       it was coming from Adams Place.

5           Q       Your impression was that it came  
6       from the direction outside the gate--

7           A       Yes, sir.

8           Q       --on Adams Place? And what happened  
9       after you heard the gunfire?

10          A       I actually grabbed my phone and I  
11       dialed 911 to report sounds of gunfire, and I  
12       went to the front door, and I told the guy to  
13       hold the door. I say, someone is shooting out  
14       here. I say, hold the door. I then went to  
15       retrieve my first aid kit just in--in case  
16       someone had been hit by gunfire, and as I'm  
17       coming back outside, I was met by someone from  
18       Security who had confirmed they had someone  
19       who had been shot, and that they were at the  
20       end of the gate.

21          Q       And what did you do?

22          A       I immediately ran to the end of the

1 gate, and this is when I saw a young gentleman  
2 sitting on the steps, bleeding profusely from  
3 his left leg. And I started asking him  
4 questions--did he feel like he was hit  
5 anywhere else? And he told me no, just the  
6 leg. I started--I took my scissors and I  
7 started cutting up his pants leg, and this is  
8 where I found the gunshot wound to his knee.  
9 I apply--

10 Q Do you have any formal training in  
11 first aid, or treating gunshot wounds?

12 A Yes, sir.

13 Q And what is that?

14 A I am an emergency medical  
15 technician certified here in D.C.

16 Q And for how long, sir?

17 A Twenty-two years.

18 Q And do you have any practical  
19 experience in dealing with persons with  
20 gunshot wounds?

21 A Working in Southeast for 22 year--  
22 for 20 of those 22 years, I picked up many

1 people with gunshot wounds.

2 Q And working for who, sir?

3 A Working with D.C. Fire/EMS.

4 Q As an employee of the D.C.  
5 Fire/EMS?

6 A Yes, sir.

7 Q 22 years?

8 A Yes, sir.

9 Q As--in part, as an EMT; is that  
10 correct?

11 A Yes, sir.

12 Q Okay. So please proceed as to what  
13 you treatment was of this person?

14 A Once I exposed the--the wound, I  
15 took a bandage and I applied direct pressure  
16 on that wound, and I cut the rest of his pants  
17 off around that leg, and the whole time he was  
18 complaining that his jeans caused \$400. And I  
19 told him he can get another pair of jeans, not  
20 another life.

21 And I asked him did he know who  
22 shot him. He said no. He said somebody--he

1       said some guy just stepped from between the  
2       cars and started shooting.

3               Q       And was anyone present with you  
4       when you were rendering aid to the victim?

5               A       Yes. There were two Security guys  
6       that normally man the gate with their--with a  
7       flashlight. There was another young lady who  
8       had identified herself as an EMT, and she was  
9       just eager to help, and I was asking her if  
10      she could actually hold the bandage in place  
11      while I got the gauze wrapped around his leg.

12              Q       Did she assist you in that regard?

13              A       Yes. She asked me for some gloves.  
14      I gave her a pair of gloves, and she assisted.

15              Q       And all this equipment was things  
16      that you had--

17              A       Yes, sir.

18              Q       --in the night club?

19              A       Yes, sir.

20              Q       For this purpose?

21              A       Yes, sir.

22              Q       At this point did you observe any

1 police or any other security personnel, not  
2 your own, that were in that area?

3 A I noticed the security personnel of  
4 the scene, that was at the gate, and at that  
5 time I didn't notice any MPD officers there on  
6 the scene.

7 Q Did you observe any other uniformed  
8 security personnel on the street?

9 A There--there was one security,  
10 special police from Metro Access.

11 Q Now where was that person?

12 A He was approximately 50--50 feet.

13 Q From?

14 A From where--from the--from the  
15 front gate, from where I was treating the  
16 young man.

17 Q Towards or away from Queens Chapel  
18 Road?

19 A Towards Queens Chapel.

20 Q You said a special police officer?

21 A Yes.

22 Q Did you happen to notice whether he

1 was armed or not?

2 A Yes. He was armed.

3 Q Okay. And what was he doing?

4 A He was actually at his Jeep,  
5 discussing with some other people what had  
6 taken place.

7 Q Did he attempt to assist you?

8 A No, sir.

9 Q Okay. Following--as you're treating  
10 this person for the gunshot wound to the leg,  
11 what happens next?

12 A By this time we had a stretcher  
13 that had made its way down the street. The  
14 uniformed EMS personnel had a stretcher there,  
15 and I gave them the particulars on his injury,  
16 and I told him that there were more people--  
17 reported more people up the street that had  
18 been hit, so--

19 Q When you say uniformed EMS, you're  
20 referring to the District of Columbia --

21 A Yes, sir.

22 Q --Fire/EMS folks are--

1           A       Yes.

2           Q       --are present at this point?

3           A       Yes.

4           Q       Okay. And you directed them to  
5 other persons that needed attention?

6           A       Well, they were going to load this  
7 gentleman up on their cart, and I was going up  
8 the street where they had reported to me that  
9 there was a young lady between the cars that  
10 had also been shot.

11          Q       And what did you say to the EMS  
12 personnel about that?

13          A       I told--I told them that they had  
14 reported there was another young lady, I was  
15 going to go up, I got some extra gauze and 4  
16 by 4s, some cleaning--

17          Q       From EM--from EMS--

18          A       From EMS, and, yes, I headed up the  
19 street.

20          Q       To look for the other victim?

21          A       Yes, which I found.

22          Q       And the first victim with the

1 gunshot wound to the leg, who stayed with, if  
2 anyone, stayed with him?

3 A Yes. Well, you had EMS there and I  
4 asked Security to stay there--

5 Q And so that he was still being  
6 tended to by other people?

7 A Yes.

8 Q Okay. And then did--you said you  
9 went to look for the woman. Did you find her?

10 A Yes, I did.

11 Q And what happened? Where did you  
12 find her?

13 A She was up the street, between  
14 cars, with--with some friends actually  
15 supporting--actually had their leg braced up  
16 against her back, to make her--I guess just  
17 had her in a position of comfort for her.

18 Q Position of comfort?

19 A Yes, and she was actually bleeding  
20 from the ankle.

21 Q And how far away from the front  
22 gate was that woman found?

1           A       I would say approximately 200 to  
2       250 feet away feet away.

3           Q       And towards or away from Queens  
4       Chapel Road?

5           A       Towards Queens Chapel Road.

6           Q       And how close to the intersection  
7       of Queens Chapel Road would you say that would  
8       have been?

9           A       I would say 40--30 to 40 feet.

10          Q       So this is very, very close to  
11       Queens Chapel Road and considerably farther  
12       away from the front gate of your  
13       establishment?

14                   MR. ADAMS:  Objection.  Leading.

15                   MR. LeFANDE:  I don't think so.  I'm  
16       characterizing it that--

17                   CHAIRPERSON MILLER:  You can  
18       address--

19                   MR. LeFANDE:  --he said 30 to 40  
20       feet from the intersection, 250 feet from the  
21       front of the club.  I think I'm simply  
22       characterizing his testimony in a manner

1 consistent with what he's already testified.

2 MR. ADAMS: Really not that much of  
3 a material point, but I would just say that  
4 the question was so it was very close to  
5 Queens Chapel Road, thus being more or less  
6 leading to the answer from the witness.  
7 Therefore, it's a leading question.

8 CHAIRPERSON MILLER: Okay. I'm  
9 going to overrule it.

10 MR. LeFANDE: Thank you.

11 CHAIRPERSON MILLER: Thank you. Go  
12 ahead.

13 BY MR. LeFANDE:

14 Q Upon discovery of the woman closer  
15 to the intersection of Queens Chapel Road, what  
16 did you do?

17 A I actually kneeled down to look at  
18 her wound. By this time, we had another EMS  
19 unit that was coming down the street with a  
20 stretcher, and I waved them over to the young  
21 lady that was on the ground.

22 Q Okay. And what happened next?

1           A        They actually put her on the  
2           stretcher and--and started towards their  
3           transport unit.

4           Q        So they loaded her--

5           A        Yes, sir.

6           Q        Okay. And did you tend to her any  
7           further once they had her on the stretcher?

8           A        No, I didn't.

9           Q        And what did you do next, sir?

10          A        I was actually approached by Lt.  
11          Griffin from the 5th District, who told me  
12          that he had a sergeant that I needed to speak  
13          with.

14          Q        And how did he--did he point or  
15          gesture or tell you where the sergeant would  
16          be found?

17          A        Yes. The sergeant was actually  
18          standing there in the middle of Adams Place,  
19          and he actually pointed directly to the  
20          sergeant, and say--

21          Q        And what did you do?

22          A        I immediately went over and asked

1 him did he need to speak with me right now.

2 Q And what did he say?

3 A He said yes, and we started down  
4 the--to the club.

5 Q And what did he talk to you about?

6 A He asked me--wanted to see my  
7 identification, wanted to confirm that I was  
8 the owner of the club, and told me that there  
9 would be some investigators coming down that  
10 I would need to speak with, and that's all the  
11 information that he needed at that time.

12 Q Did he give you any further--did he  
13 give you any instructions?

14 A No instructions at all.

15 Q And what did you do in response to  
16 what he had told you?

17 A By this time, we started back out  
18 the front door, and this is when I was met by  
19 Lt. Griffin along with two investigators from  
20 ABRA.

21 Q The ABRA investigators were present  
22 at this time?

1           A       Yes.

2           Q       And what happened then?

3           A       We immediately went into the  
4 office. They wanted to look at surveillance  
5 tape, and they told me they needed the--we  
6 actually looked at some of the footage, and  
7 they gave me the times that they wanted me to  
8 actually record and present to them.

9           Q       And were you able to retrieve this  
10 video footage for them?

11          A       Yes, I was.

12          Q       And you--

13          A       Not on that particular night,  
14 because we didn't have, actually, anything to  
15 record--

16          Q       But they were able to look at it?

17          A       Yes.

18          Q       That night?

19          A       Yes.

20          Q       And you did so willingly?

21          A       Yes.

22          Q       Now briefly, with regards to the

1 system that they observed that on, can you  
2 tell me, for instance, how many cameras the  
3 system had?

4 A Has 16 cameras.

5 Q Sixteen cameras?

6 A Yes, sir.

7 Q And each one of these cameras is  
8 recorded? Is that--

9 A Yes.

10 Q Okay. And for how long does the  
11 recording last before lost, or--

12 A Approximately 30 days.

13 Q So you have 30 days of recording  
14 capability on 16 cameras. Do you have any  
15 additional recording systems besides the 16  
16 cameras?

17 A No, sir. My neighboring business  
18 does.

19 Q Okay. We'll get to that in just a  
20 second. When you were able to show the May 30,  
21 2014 the video to the ABRA investigators, did  
22 they appear to be satisfied with what you

1 produced for them?

2 A This was upon their request; yes.

3 Q And they said that--did they give  
4 you any indication, that was adequate to their  
5 inquiry?

6 A Yes. I assumed, because they asked  
7 for the designated times, that they asked.

8 Q And there came a time later where  
9 you actually produced the video that they  
10 could take away with them?

11 A Yes.

12 Q Okay. And is that in fact the video  
13 that we watched, the other day, in this  
14 hearing?

15 A Yes, with the exception of I think  
16 two of the cameras.

17 Q Okay. And you stated that you also  
18 assisted them in obtaining other video  
19 footage?

20 A Yes, sir. I actually went to my  
21 neighboring businesses, and actually retrieved  
22 the video footage which occurred on Adams

1 Place, and I submitted that to them as well.

2 Q Did they ask you to do that?

3 A No, sir.

4 Q Okay. You just did that of your own  
5 accord?

6 A Yes, sir.

7 Q Back to the morning of May 17th,  
8 after you had the opportunity to provide, or  
9 at least show the video to the two ABRA  
10 investigators, were you questioned by any  
11 member of the police department?

12 A Not at that time; no.

13 Q Did there come a time since the  
14 morning of May 17th, that you were questioned  
15 by any member of the police department?

16 A Let me back up. Lt. Griffin did ask  
17 me how many security persons did I have on  
18 that night.

19 Q Was that at the time that he  
20 referred you to the sergeant?

21 A Yes. That's when they actually came  
22 in with the ABRA investigators.

1           Q       Did there come a time that you were  
2 interviewed or questioned by a detective?

3           A       Yes.

4           Q       And when was that?

5           A       This was the following day.

6           Q       And could you please describe for  
7 me the circumstances with regards to your  
8 interview by the detectives.

9           A       Yes. They came in, wanted to go  
10 over the footage in--in length, and I sat  
11 there and we looked at the video footage. And  
12 he wanted to know how many Security did we  
13 have there that night, was there any  
14 altercations inside. I think basically that  
15 was it.

16                   He--he gave me his card, and said  
17 if he needed--actually, he told me someone  
18 from their audiovisual department would be  
19 contacting me to come over and download the  
20 footage because they had some new equipment  
21 that would record in--in slower time, and they  
22 could view it a lot better if it was snowy.

1           Q       Did there come a time where such a  
2 person has contacted you?

3           A       Yes, sir.

4           Q       And when did that happen?

5           A       That happened, I think, that  
6 following Monday.

7           Q       Okay. Have other than--and what  
8 happened with regards to dealing with the  
9 audiovisual person? What transpired?

10          A       Actually, he came in, he brought  
11 all his equipment in, and I pulled my DVR, and  
12 he connected my terminal to download footage  
13 directly in to his computer.

14          Q       And for the benefit of someone, the  
15 public here might not know, what does the  
16 acronym DVR stand for?

17          A       It's digital video recorder.

18          Q       Thank you. And that refers to the  
19 system that records these cameras?

20          A       Yes, sir.

21          Q       Okay. Thank you. And did the  
22 audiovisual persons appear to be satisfied

1 with your assistance in that regard?

2 A Yes, sir. He was.

3 Q Okay. In each one of these  
4 instances, in interacting with the police  
5 department and the ABRA investigators, were  
6 you in fact fully cooperative with their  
7 inquiries?

8 A Yes, sir.

9 Q Okay. And did there come a time  
10 that any of the police inquired about the  
11 existence of a reimbursable detail at your  
12 establishment on the morning of May 17th?

13 A They didn't reply anything directly  
14 to me, but--

15 Q Did they ask you about whether--  
16 why--whether or not there was a reimbursable  
17 detail there?

18 A No, sir. He did not.

19 Q Okay. Did they ask you about why  
20 there wasn't a reimbursable detail there?

21 A No, sir. He didn't.

22 Q Okay. Have you--was there in fact

1 a reimbursable detail at your establishment on  
2 the morning of May 17th?

3 A You say was there?

4 Q Was there.

5 A No, sir. There wasn't.

6 Q Okay. Have you previously employed  
7 a reimbursable detail at your establishment?

8 A Yes, sir.

9 Q Okay. And when did you first start  
10 employing a reimbursable detail at your  
11 establishment?

12 A When we opened, approximately five  
13 years ago.

14 Q Okay. And did you do that--were you  
15 ordered to do that?

16 A No, sir.

17 Q You did that of your own volition?

18 A Yes, sir.

19 Q And in the five years since then,  
20 what occasions have you employed such a  
21 reimbursable detail? Is there some particular  
22 criteria, or is there particular instances?

1       What would prompt you to employ a reimbursable  
2       detail?

3           A       Well, there were a few entertainers  
4       that I know would carry a larger crowd than  
5       normal, and at one point we were the only  
6       venue down there, on Adams Place. There were  
7       no other clubs. So I wanted to actually make  
8       sure we had the perimeter, a 1000 foot  
9       perimeter covered, that we were responsible  
10      for.

11          Q       When was the last time that you  
12      employed a reimbursable detail at the  
13      establishment?

14          A       I want to say up till April.

15          Q       And did you discontinue your  
16      employment of the reimbursable detail in  
17      April?

18          A       No, sir. I didn't.

19          Q       What happened?

20          A       I was sent notification in  
21      reference to payment.

22          Q       Who did you receive this

1 notification from?

2 A From James Rogers--

3 Q And--

4 A --who was with MPD.

5 Q Okay. And what did that--what was  
6 that notification about?

7 A That they--they were notified by  
8 the Chief Finance Office that there were some  
9 invoices that were outstanding.

10 Q And about what time did he have  
11 this--make this notification to you?

12 A I don't recall. At some point  
13 during the day, by e-mail.

14 Q In April?

15 A No. I want to say it was February.

16 Q February. Okay.

17 A Yes. When I got notification.

18 MR. LeFANDE: May I approach the  
19 witness.

20 CHAIRPERSON MILLER: Any objection?  
21 Not hearing any, go ahead.

22 MR. LeFANDE: Give him a second to

1 have a look at that.

2 CHAIRPERSON MILLER: What--

3 MR. LeFANDE: We're passing up  
4 copies to you, for what's been previously  
5 marked for identification as Respondent's  
6 Exhibit A as in alpha.

7 BY MR. LeFANDE:

8 Q Sir, do you recognize this  
9 document?

10 A Yes, sir.

11 Q And can you tell me what this  
12 document is.

13 A This is an e-mail from James  
14 Rogers, from MPD, to myself.

15 Q And below the first part there, are  
16 there other e-mails attached to it?

17 A Yes, sir.

18 Q So this is what's referred to as  
19 the e-mail string?

20 A Yes.

21 Q And if we look towards the bottom,  
22 that would be an earlier e-mail, and moving

1       towards the top is a later e-mail?

2               A       Yes.

3               Q       Okay. Drawing your attention  
4       towards the bottom of the e-mail, is there an  
5       earlier e-mail from James Rogers?

6               A       Yes; it is.

7               Q       And could you tell me what that e-  
8       mail says.

9               A       It says: "The Scene. MPD has been  
10       notified by the Office of Chief Financial --  
11       officers, that your payments for reimbursable  
12       detail, already performed, is past due. Scene  
13       currently owes \$15,155.84."

14              Q       Please continue.

15              A       "Payment must be made, in full, by  
16       close of business, Monday, February the 3rd,  
17       at the Office of Chief Financial. Offices are  
18       located at 300 Indiana Avenue, N.W. If payment  
19       is not made, your currently scheduled detail  
20       will be discontinued. For the sanction  
21       requiring repayment--pre-payment before any  
22       detail is performed, may also be instituted.

1 If you have any questions, please let us know.

2 Thank you. James Rogers"

3 Q Does this appear to be an e-mail  
4 that you received from James Rogers?

5 A Yes; it is.

6 Q And the date of that, sir.

7 A This is Wednesday, January 29,  
8 2014.

9 Q And do you recall if you had an  
10 opportunity to respond to Sergeant Rogers  
11 about this e-mail?

12 A Yes. I did.

13 Q And is that included in the string  
14 to which we're looking at right now?

15 A Yes; it is.

16 Q And what did you say to Sergeant  
17 Rogers?

18 A I said hello, Sergeant Rogers,  
19 thank you very much for your notification in  
20 this matter. We can--can--can we please start  
21 to reconcile paperwork, that is to say, number  
22 of officers requested with the number of

1 officers who showed up for the reimbursable  
2 detail at The Scene. If this is not your  
3 field, can you please forward the contact  
4 information to me, so that we can get this  
5 taken care of ASAP. Thank you very much. P.S.  
6 I am--I may also be reached at--and I left my  
7 phone number.

8 Q And what does ASAP refer to, sir?

9 A As soon as possible.

10 Q Thank you. And what phone number is  
11 that, that you're offering him?

12 A That's my cell number.

13 Q Okay. This first sentence here, it  
14 says you would like to reconcile the  
15 paperwork, the number of officers requested  
16 with the number of officers who showed up.

17 Do you recall whether there was a  
18 discrepancy between these?

19 A Yes, sir. There was.

20 Q And what was--what is it that  
21 you're referring to there?

22 A Referring to the request of eight

1 officers, and we would get four, or we would  
2 get five, we would get six. So I--I knew that  
3 I was billed for the eight, so they owed me a  
4 credit.

5 Q So you're saying that you would ask  
6 for eight, you'd be billed for eight, but  
7 sometimes you would receive less than eight?

8 A Yes, sir.

9 Q And how often did that happen?

10 A Quite regular.

11 Q Quite regularly?

12 A Yes.

13 Q And yet they still continued to  
14 bill you for the full amount?

15 A Yes.

16 Q Okay. Did Officer--do you recall  
17 whether you received a response from Sergeant  
18 Rogers?

19 A Yes.

20 Q And when would that have been?

21 A That was on January the 30th.

22 Q And--

1           A       2014.

2           Q       What did he say to you?

3           A       He told me that would be me. If  
4 there are any dates and questions that a  
5 credit should be given, let me know what the  
6 dates are, and I will confirm with our sign-  
7 in/sign-out log completed during the details.

8           Q       At that time, did he make any  
9 further mention that your details would be  
10 discontinued?

11          A       No, sir.

12          Q       And this e-mail stream, again,  
13 appears to be a true and accurate  
14 representation, as you recall, of your  
15 correspondence with Sergeant Rogers?

16          A       Yes, sir.

17                   MR. LeFANDE: Madam Chair, I ask  
18 that Respondent's Exhibit A, this e-mail  
19 stream from January 29th to January 30th be  
20 admitted as Respondent's Exhibit A.

21                   MR. ADAMS: No objection.

22                   CHAIRPERSON MILLER: No objection.

1 And it's admitted. Respondent's Exhibit A.

2 MR. LeFANDE: Thank you.

3 CHAIRPERSON MILLER:

4 (Respondent's Exhibit A,  
5 previously marked for  
6 identification, was  
7 received in evidence)

8 MR. LeFANDE: May I approach the  
9 witness.

10 CHAIRPERSON MILLER: Yes.

11 BY MR. LeFANDE:

12 Q Sir, do you recognize this  
13 document?

14 A Yes, sir.

15 Q Could you tell me what that  
16 document is.

17 A This is an e-mail that I sent to  
18 Sabrina Goodwin from the Office of Chief  
19 Finance.

20 Q And what is it regarding?

21 A It's regarding the--the reconciling  
22 of the invoices.

1           Q       And who is Ms. Goodwin? Who--what  
2           is--who does she--what does she do?

3           A       Ms. Goodwin was the contact person  
4           at the Chief Finance Office.

5           Q       Okay. And what is the date of your  
6           correspondence with her?

7           A       This is on February the 5th, 2014.

8           Q       Of this year.

9           A       Yes.

10          Q       And could you just recite for us  
11          what it is that you asked, or said to Ms.  
12          Goodwin.

13          A       Yes. I wrote: "Good morning, Ms.  
14          Goodwin. I've been working with Sergeant  
15          Rogers of MPD in reconciling the timesheets of  
16          officers who reported to our overtime detail  
17          at The Scene. He told me--he told me that he  
18          will be reaching out to your office to report  
19          the correct number, and hopes that a proper  
20          cost invoice will be issued. Thank you for  
21          your assistance in this matter."

22          Q       Okay, sir. Does this appear to be

1 a true and accurate recording of your  
2 correspondence with Ms. Goodwin on February  
3 5th, 2014?

4 A Yes, sir.

5 MR. LeFANDE: Okay. Madam Chair, I  
6 ask that Respondent's, what's been previously  
7 marked for identification as Respondent's  
8 Exhibit B, be admitted in to evidence as  
9 Respondent's Exhibit B.

10 MR. ADAMS: No objection.

11 CHAIRPERSON MILLER: Okay.

12 Admitted.

13 (Respondent's Exhibit B,  
14 previously marked for  
15 identification, was  
16 received in evidence)

17 MR. LeFANDE: May I approach the  
18 witness.

19 CHAIRPERSON MILLER: Yes.

20 BY MR. LeFANDE:

21 Q Do you recognize this document,  
22 sir?

1           A        Yes.

2           Q        And is this, again, an e-mail  
3 stream as we described earlier?

4           A        Yes; it is.

5           Q        Okay. Calling your attention to the  
6 middle of the page, do you see an e-mail  
7 there?

8           A        Yes.

9           Q        And who is that written by?

10          A        It's from Patricia Campbell.

11          Q        And who is Patricia Campbell?

12          A        She works with the Chief Finance  
13 Office.

14          Q        And were you a recipient of this e-  
15 mail from Patricia Campbell?

16          A        Yes. I was.

17          Q        Okay. And could you recite for us  
18 what that e-mail says.

19          A        It says: "Good afternoon. Mr.  
20 Blakeney of The Scene reached out to me this  
21 afternoon to ask if MPD has received payment  
22 that they had sent via U.S. mail for the

1 invoice 2623 in the amount of \$7,689.36. Since  
2 we do not receive payments in this office,  
3 there's not much information I could provide,  
4 and I am hoping that someone in the Office of  
5 Chief Financial could please advise. I have  
6 attached the invoice and a copy of the  
7 cashier's check for reference. Thank you for  
8 your assistance."

9 Q And is there a point in this string  
10 in which anyone responds to her e-mail?

11 A No; there isn't.

12 Q Further up--

13 A Oh, further up. Yes. There is.

14 Q And what is that?

15 A That's from Sergeant Rogers to  
16 Patricia Campbell.

17 Q And what's the date of that?

18 A That is March the 7, 2014.

19 Q And were you also a recipient of  
20 that e-mail?

21 A Yes. I was. I was cc'ed.

22 Q And what does that e-mail state?

1           A        It says: "We are not staffing until  
2 we've received word that payment was  
3 received."

4           Q        Does this document appear to  
5 accurately reflect the e-mail correspondence  
6 as you remember it on March 7th?

7           A        Yes; it is.

8                   MR. LeFANDE: Madam Chair, I ask  
9 that what's been previously marked for  
10 identification as Respondent's Exhibit C be  
11 entered in to evidence as Respondent's Exhibit  
12 C.

13                   CHAIRPERSON MILLER: Any  
14 objections?

15                   MR. ADAMS: Potentially, Madam  
16 Chair--well, actually, there is an objection.  
17 I guess--well, I have just one question for--  
18 regarding this. Apparently it was read here,  
19 where it says "I have attached an invoice, a  
20 copy of the cashier's check for reference."  
21 Never mind. I'll withdraw it. I withdraw the  
22 objection. No objection.

1 CHAIRPERSON MILLER: Okay. Then  
2 Exhibit C of Respondent's is admitted.

3 (Respondent's Exhibit C,  
4 previously marked for  
5 identification, was  
6 received in evidence)

7 MR. LeFANDE: May I approach the  
8 witness.

9 CHAIRPERSON MILLER: Yes.

10 BY MR. LeFANDE:

11 Q Sir, do you recognize this  
12 document?

13 A Yes, sir.

14 Q And can you tell us what this  
15 document is.

16 A This is an e-mail from me to  
17 Sergeant Rogers, and I cc'ed Martha Jenkins of  
18 ABRA on this also.

19 Q Again, in this instance, do we have  
20 a string of e-mails, that the one that you're  
21 responding to, also present here?

22 A Excuse me?

1           Q       Is this an e-mail string again,  
2       sir?

3           A       Yes. Yes, sir. It is.

4           Q       Okay. So turning your attention to  
5       the middle of the page, is there an e-mail  
6       that you were responding to in that instance?

7           A       Yes, sir.

8           Q       And who is that from?

9           A       This is from Sergeant Rogers, MPD.

10          Q       And who is it addressed to?

11          A       Is addressed to me.

12          Q       Okay. And what is he saying there?

13          A       "I have reviewed your October and  
14       November timesheets. You will receive the  
15       following credits." And it reads: 10-25-13, 24  
16       hours; 11-1-13, 8 hours; 11-9-13, 4 hours. I  
17       will forward this information to the Office of  
18       Chief Finance to issue new invoices reflecting  
19       the credits."

20          Q       And what is the date of that e-  
21       mail?

22          A       That is April 29th, 2014.

1           Q       And what does this mean to you,  
2       that you will receive the following credits?

3           A       That they will send me a new  
4       revised invoice for credit that I was due.

5           Q       And he says so on April 29th. Did  
6       you have an opportunity to respond to this e-  
7       mail?

8           A       Yes. I did.

9           Q       And what date was that?

10          A       This was on May the 9th, 2014.

11          Q       And who did you address that to?

12          A       I addressed this to James Rogers,  
13       and I cc'ed Martha Jenkins also.

14          Q       And what did you say in that e-  
15       mail?

16          A       I said: "Good morning, Sergeant  
17       Rogers. We have not received the latest  
18       revised invoice of credit from Office of Chief  
19       Finance. Can you please make contact with  
20       whomever your contact may be within their  
21       office, so that we may close out the  
22       remainder. Thank you very much for all your

1 help working with us in reconciling the  
2 negative balance. Have a great weekend."

3 Q So as of May 9th, 2014, you had  
4 not received those revised--

5 A No, sir.

6 Q And absent those revised invoices,  
7 was it possible for you to pay the invoices?

8 A Yes; it was possible to--

9 Q Accurately pay those invoices?

10 A Before--before revise?

11 Q Right.

12 A Oh, no.

13 Q Okay. Thank you. Does this document  
14 accurately reflect your correspondence with  
15 Sergeant Rogers on May 9th, and on April 29th?

16 A Yes.

17 MR. LeFANDE: Madam Chair, I ask  
18 that what has been previously marked for  
19 identification as Respondent's Exhibit D be  
20 entered in to evidence as Respondent's Exhibit  
21 D.

22 CHAIRPERSON MILLER: Any

1 objections?

2 MR. ADAMS: No objections.

3 CHAIRPERSON MILLER: Okay.

4 Admitted. Respondent's Exhibit number D.

5 (Respondent's Exhibit D,  
6 previously marked for  
7 identification, was  
8 received in evidence)

9 MR. LeFANDE: May I approach the  
10 witness.

11 CHAIRPERSON MILLER: Yes.

12 BY MR. LeFANDE:

13 Q Do you recognize this document,  
14 sir?

15 A Yes, sir.

16 Q Is this, again, another e-mail  
17 stream?

18 A Yes; it is.

19 Q Turning your attention to the  
20 bottom of the page, there appears to be an e-  
21 mail from March 7th, I think we've already  
22 seen; is that correct?

1           A       Yes.

2           Q       Okay. And is there a response to  
3 that e-mail?

4           A       Yes; it is.

5           Q       Okay. And just starting off with  
6 the e-mail of March 7th, what is being asked  
7 by Patricia Campbell?

8           A       Patricia Campbell asked Mr.  
9 Blakeney at The Scene to me this afternoon to  
10 ask MPD if MPD has received the payment that  
11 they have sent via U.S. mail for Invoice 2623,  
12 \$7,689.36. Since we do not receive payments in  
13 this office, there's not much information I  
14 could provide, and I am hoping that someone in  
15 the Office of Chief Finance please--could  
16 please advise."

17          Q       Thank you., sir. And is there,  
18 somewhere in this stream, where someone  
19 answered in the affirmative?

20          A       Yes.

21          Q       And who is that, sir?

22          A       Winston Jackson from the Office of

1 Chief Finance.

2 Q And what Winston Jackson say?

3 A Winston asked: Did someone on your  
4 staff respond to the organization or Patricia?

5 Q And did Patricia respond to that e-  
6 mail?

7 A Yes; she did.

8 Q And who is she addressing her  
9 response to?

10 A She addressed it to Lena Turner and  
11 myself. And Loretta Walker from MPD.

12 Q And what about Sergeant Rogers?

13 A And Sergeant Rogers. Yes.

14 Q Okay. And what is Patricia Campbell  
15 stating there?

16 A She stated: "Good afternoon. Per  
17 the Office of Chief Finance below, the payment  
18 has been received. Thank you. Patricia."

19 Q And this is four days after  
20 Patricia's initial inquiry; is that correct?

21 A Yes.

22 Q Thank you. Does this document

1 accurately reflect the correspondence you  
2 received from these folks between March 7th  
3 and March 11th?

4 A Yes; it is.

5 MR. LeFANDE: Madam Chair, I ask  
6 that what has been previously marked for  
7 identification as Respondent's Exhibit E be  
8 moved in to evidence as Respondent's Exhibit  
9 E.

10 MR. ADAMS: No objection.

11 CHAIRPERSON MILLER: Okay.

12 Respondent's Exhibit E is admitted.

13 (Respondent's Exhibit E,  
14 previously marked for  
15 identification, was  
16 received in evidence)

17 MR. LeFANDE: May I approach the  
18 witness.

19 CHAIRPERSON MILLER: Yes.

20 BY MR. LeFANDE:

21 Q Do you recognize this document,  
22 sir?

1           A       Yes, sir.

2           Q       And could you tell us what this  
3 document is.

4           A       This is another e-mail stream from  
5 Sergeant Rogers.

6           Q       And does it in fact respond to the  
7 previous stream that we saw?

8           A       Yes; it is.

9           Q       Okay. And what is that stating from  
10 Sergeant Rogers?

11          A       It stated: "Great. Do we know if it  
12 was for the full 14,000, or just the 7,689  
13 they stated they sent?"

14          Q       Very good, sir. And does this  
15 accurately reflect the e-mail that you  
16 received from James Rogers on March 11th?

17          A       Yes; it is.

18                   MR. LeFANDE: Madam Chair, I ask  
19 that what's been previously marked for  
20 identification as Respondent's Exhibit F be  
21 moved in to evidence as Respondent's Exhibit  
22 F.

1 MR. ADAMS: No objections.

2 CHAIRPERSON MILLER: Okay.

3 Admitted.

4 (Respondent's Exhibit F,  
5 previously marked for  
6 identification, was  
7 received in evidence)

8 MR. LeFANDE: May I approach the  
9 witness.

10 CHAIRPERSON MILLER: Yes.

11 BY MR. LeFANDE:

12 Q Do you recognize this document?

13 A Yes, sir.

14 Q And is this, again, an e-mail  
15 stream?

16 A Yes.

17 Q Okay. Turning your attention to the  
18 bottom third of the page, do you see an e-mail  
19 there from Winston Jackson?

20 A Yes.

21 Q Okay. And what does Winston Jackson  
22 say?

1           A       Mr. Jackson stated: "The check was  
2       made for \$7,689."

3           Q       And calling your attention to the  
4       message board of that, is that in fact a  
5       response to James Rogers' e-mail that was in  
6       Exhibit F?

7           A       Yes; it is.

8           Q       Okay. And turning your attention to  
9       the e-mail above that, did Sergeant Rogers  
10      respond to that e-mail?

11          A       Yes. He did.

12          Q       And what did he say?

13          A       He stated that: "Thank you. So  
14      there is still an outstanding balance. We will  
15      not staff the detail until the balance is  
16      paid. Please let us know if and when that  
17      occurs. Thank you. James Rogers."

18          Q       But at this time you had not  
19      received the revised invoices; is that  
20      correct?

21          A       No, sir.

22          Q       Does this document accurately

1 reflect the e-mails that you received from  
2 Jackson, Winston Jackson, and Sergeant Rogers,  
3 on March 11th?

4 A Yes.

5 MR. LeFANDE: Madam Chair, I ask  
6 that what has been previously marked for  
7 identification as Respondent's Exhibit G be  
8 entered in to evidence as Respondent's Exhibit  
9 G.

10 MR. ADAMS: I'm sorry. No  
11 objection.

12 CHAIRPERSON MILLER: Okay.  
13 Respondent's Exhibit G is admitted.

14 (Respondent's Exhibit G,  
15 previously marked for  
16 identification, was  
17 received in evidence)

18 MR. LeFANDE: May I approach the  
19 witness.

20 CHAIRPERSON MILLER: Yes.

21 BY MR. LeFANDE:

22 Q Do you recognize this document,

1 sir?

2 A Yes, sir.

3 Q And is this your response to  
4 Sergeant Rogers' e-mail that was in Exhibit G?

5 A Yes; it is.

6 Q And what did you say?

7 A I said: "The certified check was  
8 for the full amount of the invoice that was  
9 sent to me by Sabrina Goodwin of the Office of  
10 Chief Finance. I never received an invoice in  
11 the amount of 14,000. Please provide any  
12 additional timesheets, with my signature, to  
13 help us reconcile the difference, so that we  
14 can move forward. Thank you. Willie Blakeney."

15 Q And this was in fact addressed to  
16 James Rogers?

17 A Yes, sir. It was.

18 Q And also was--

19 A CC'ed to Martha Jenkins.

20 Q --cc'ed to okay of this agency?

21 A Yes, sir.

22 Q And this was on the same date as

1 the e-mail that you received from Sergeant  
2 Rogers; is that correct?

3 A Yes, sir. It was.

4 MR. LeFANDE: Madam Chair--I'm  
5 sorry.

6 BY MR. LeFANDE:

7 Q And Mr. Blakeney, this document  
8 accurately reflects your correspondence with  
9 Sergeant Rogers, and Martha Jenkins, on that  
10 date?

11 A Yes, sir.

12 MR. LeFANDE: Okay. Madam Chair, I  
13 ask that what has been previously marked for  
14 identification as the Respondent's Exhibit H  
15 be entered in to evidence as Respondent's  
16 Exhibit H.

17 MR. ADAMS: No objections.

18 CHAIRPERSON MILLER: Okay.

19 Respondent's Exhibit H is admitted.

20 (Respondent's Exhibit H,  
21 previously marked for  
22 identification, was

1 received in evidence)

2 MR. LeFANDE: H as in Henry. The  
3 copies you're receiving, coming up, should be  
4 marked, premarked already, so

5 CHAIRPERSON MILLER: Yes, they are.  
6 It's very helpful. Thank you.

7 MR. LeFANDE: May I approach the  
8 witness.

9 CHAIRPERSON MILLER: Yes.

10 BY MR. LeFANDE:

11 Q Do you recognize this document,  
12 sir?

13 A Yes, sir.

14 Q And what is this document?

15 A This is another stream of e-mails,  
16 and this one is from Martha Jenkins, addressed  
17 to myself.

18 Q Okay. And she is replying to what?

19 A "Thanks for copying me, Willie.  
20 Please keep me posted."

21 Q And what is she saying? What is it  
22 that she's thanking you for copying her? Is

1 that the e-mail below it?

2 A Yes, in reference to the e-mail  
3 stream that has been going on between myself  
4 and Sergeant Rogers.

5 Q Okay. So looking directly below  
6 Martha Jenkins' response, there's an e-mail  
7 from you. Could you give us the date and the  
8 time of that e-mail.

9 A This is March the 11th--I mean  
10 March the 12th, approximately 7:42 a.m.

11 Q Okay. And that's the date that she  
12 responded. The one below it, if you would,  
13 please. Right where it says Original Message.

14 A March 11th, 2014.

15 Q Okay. And is this an e-mail--who  
16 is this e-mail from?

17 A This is from myself, Willie  
18 Blakeney, sent to Sabrina Goodwin.

19 Q And what office does she work in  
20 again?

21 A Office of Chief Finance.

22 Q And again, copying Ms. Jenkins.

1       What is it that you are saying in this e-mail?

2       If you'd recite that for me, please.

3               A       I said there are several dates that  
4       are in question in your open balance report.  
5       I've requested from Sergeant Rogers timesheets  
6       to confirm the dates. The number of officers  
7       that were present on the dates, we have not  
8       received any other paperwork per our request,  
9       other than the adjusted invoice, 2623, for the  
10       amount of \$7,689.36 from the Office of Chief  
11       Finance, which was paid by certified funds  
12       immediately afterwards. We are still awaiting.  
13       Thank you. Willie Blakeney."

14              Q       So is it a correct and truthful  
15       statement, that you have not received other  
16       paperwork per your request, other than  
17       adjusted Invoice 2623?

18              A       Yes, sir.

19              Q       At that--as of March 11?

20              A       Yes, sir.

21              Q       And is it a truthful statement that  
22       you in fact paid by certified funds,

1 immediately thereafter--

2 A Yes, sir.

3 Q --for the amount of 7689.36? And  
4 was it correct that on--a truthful statement,  
5 that on March 11th, 2014, you were still  
6 awaiting additional information from the  
7 Office of the Chief Financial Officer?

8 A Yes, sir.

9 Q Superseding --

10 A Yes.

11 Q Thank you. So this document, in  
12 addition, accurately reflects your e-mail  
13 correspondence with both Sabrina Goodwin and  
14 Martha Jenkins on March 11, 2014; is that  
15 correct?

16 A Yes, sir. That's correct.

17 MR. LeFANDE: Madam Chair, I ask  
18 that what has been previously marked for  
19 identification as the Respondent's Exhibit I  
20 be entered in to evidence as Respondent's  
21 Exhibit I.

22 MR. ADAMS: No objections.

1 CHAIRPERSON MILLER: Okay.

2 Respondent's Exhibit I is admitted.

3 (Respondent's Exhibit I,  
4 previously marked for  
5 identification, was  
6 received in evidence)

7 CHAIRPERSON MILLER: We're going to  
8 take a five minute break.

9 MR. LeFANDE: Oh, okay. Yeah. It  
10 seemed like we were losing Board Members--

11 CHAIRPERSON MILLER: Right;  
12 exactly.

13 MR. LeFANDE: So I thought maybe you  
14 want to--we were wondering whether--I didn't  
15 want to get too much in to the parliamentary  
16 procedure of it, but I wasn't sure we still  
17 had a quorum to proceed.

18 CHAIRPERSON MILLER: Right.  
19 Exactly. So I just noticed that.

20 MR. LeFANDE: Why don't we--

21 CHAIRPERSON MILLER: Why don't we  
22 take a 10 minute break. Okay. Thank you.

1                   (Whereupon, the above-entitled  
2 matter went off the record at 4:01 p.m. and  
3 resumed at 4:02 p.m.)

4                   CHAIRPERSON MILLER: Are we ready?  
5 Okay. Good. Go. We're ready. Are you  
6 ready?

7                   MR. LeFANDE: All right. I didn't  
8 know whether you were.

9                   CHAIRPERSON MILLER: Yep, we're  
10 ready.

11                  MR. LeFANDE: Are you announcing  
12 the case? Are you calling the case again?

13                  CHAIRPERSON MILLER: Oh, okay.

14                  MEMBER ALBERTI: Continue.

15                  MR. LeFANDE: Madam Chair, may I  
16 approach the witness?

17                  CHAIRPERSON MILLER: Yes.

18                  BY MR. LeFANDE

19                  Q           Continuing our examination, we  
20 will have to move for the respondent. Sir, do  
21 you recognize this document?

22                  A           Yes, I do.

1 Q Okay. And what is this document?

2 A This is the email trail.

3 Q Okay. And looking at the bottom  
4 of the page, you see an email from Sergeant  
5 Rogers?

6 A Yes, sir, I do.

7 Q And what is the date of that  
8 email?

9 A March 25, 2014.

10 Q And who is that addressed to?

11 A It's addressed to me from Sergeant  
12 Rogers.

13 Q And what does it say?

14 A It says, "Mr. Blakeney, just  
15 touching bases with you. I forwarded you the  
16 time sheets from January to February" of --  
17 "on 3/14/14. We have been notified by the  
18 Office of Chief Finances that The Scene still  
19 has an outstanding balance, account balance.  
20 The police detail at The Scene, which are  
21 required by ABRA, will not resume until the  
22 account is paid in full. If you have any

1 questions, you can contact the office -- Chief  
2 Financial Officer. Thank you. James Rogers."

3 Q Did you reply to this email?

4 A Yes, I did.

5 Q And what did you say to Sergeant  
6 Rogers?

7 A I said "Hello, Sergeant Rogers,  
8 below you will find my calculation for Invoice  
9 2565 based on my findings of the time sheets  
10 you sent." And it lists the dates.

11 Q Turning your attention to January  
12 4th, did you receive an invoice being billed  
13 for services on January 4th?

14 A You say on January the 4th?

15 Q 4th.

16 A No, sir. We were closed.

17 Q Did they -- did you get billed for  
18 services on that day?

19 A Yes, sir, I did.

20 Q So even though the establishment  
21 was closed, the Metropolitan Police Department  
22 and the Office of Finance, Chief Financial

1 Officer, still sent you a bill for services on  
2 that date?

3 A Yes, sir.

4 Q Thank you. And you made a  
5 calculation as to Invoice 2565 to revise it in  
6 what way?

7 A I sent an email to him stating  
8 that "Invoice 2565 should be adjusted and  
9 revised from \$8,023.68 to \$6,797.84. Please  
10 check behind me to confirm or correct my  
11 calculation. Thank you very much. Willie  
12 Blakeney."

13 Q So based on your calculation for  
14 Invoice 2565, they had -- is it correct that  
15 they over-billed you by more than \$1,200?

16 A Yes, sir.

17 Q And did Sergeant Rogers respond to  
18 that?

19 A Yes, he did.

20 Q Now, what did he say?

21 A He said "After reviewing the time  
22 sheets, I have advised the Office of Chief

1 Finance Officer that The Scene is due the  
2 following credits for January."

3 Q And did that include a revision  
4 for January 4th?

5 A Yes, it did.

6 Q And for how many officers?

7 A For eight officers.

8 Q And for how many hours?

9 A 32 hours.

10 Q So this was billed 32 hours for  
11 police services on a day you were closed?

12 A Yes, sir.

13 Q Okay. Does this document  
14 accurately reflect your correspondence with  
15 Sergeant Rogers between May 25th and April 8th?

16 A Yes, it is.

17 Q Madam Chair, I ask that what was  
18 previously marked for identification as  
19 Respondent's Exhibit J be entered into  
20 evidence as Respondent's Exhibit J.

21 MR. ADAMS: No objections.

22 CHAIRPERSON MILLER: Respondent's

1 Exhibit J is admitted.

2 (Whereupon, the document marked as  
3 Respondent Exhibit J was received  
4 in evidence.)

5 Q May I approach the witness?

6 CHAIRPERSON MILLER: Yes.

7 Q Do you recognize this document,  
8 sir?

9 A Yes, I do.

10 Q And what is this document?

11 A This is an email from myself to  
12 Sergeant James Rogers, cc'd Martha Jenkins and  
13 also Sabrina Goodwin.

14 Q And what is it that you are asking  
15 of Sergeant Rogers on -- what date is that?  
16 I'm sorry, is that, what's the date?

17 A This is April 9, 2014.

18 Q And what is it that you are asking  
19 of Sergeant Rogers on that date?

20 A I said "Hello, Sergeant Rogers,  
21 there are two invoices that I would greatly  
22 appreciate your assistance in verifying the

1 dates and officers in attendance for The Scene  
2 detail through your 157s. Those invoices and  
3 dates are listed as below: Invoice 2378,  
4 which lists October the 5th through the 2" --

5 Q You don't have to recite the  
6 dates. And what is the other invoice?

7 A Invoice 2449.

8 Q And what month was that?

9 A This was in -- this was for  
10 November.

11 Q And, as we saw in the previous  
12 exhibit, you had raised a concern about the  
13 inaccuracy of the invoice, and to the tune of  
14 \$1,200 and was that, in fact, proven to be  
15 true?

16 A Yes, sir, it was.

17 Q So -- and you believe these  
18 invoices to be so similarly situated?

19 A Yes.

20 Q Is that correct?

21 A Yes, sir.

22 Q And your closing statement there,

1 what is that that you say at the bottom there?

2 A It says, I stated that "This will  
3 close out any negative balances with MPD, and  
4 we look forward to resuming our relationship  
5 with your team. Thank you so very much for  
6 all your assistance in this matter. Willie  
7 Blakeney."

8 Q So, as of April 9th of this year,  
9 you believed that there were only two  
10 inaccurate invoices that needed to be  
11 addressed --

12 A Yes, sir.

13 Q -- that were outstanding with the  
14 police department?

15 A Yes, sir.

16 Q And do you believe that to be --  
17 no, no, I don't want to say that. At the time  
18 of April 9th did you believe that to be true?

19 A Yes, sir.

20 Q Okay. And does this document  
21 accurately reflect your correspondence to  
22 James Rogers, Martha Jenkins and Sabrina

1 Goodwin on April 9, 2014?

2 A Yes, it is.

3 MR. LeFANDE: Madam Chair, I ask  
4 that what has been previously marked for  
5 identification as Respondent's Exhibit K be  
6 entered into evidence as Respondent's Exhibit  
7 K.

8 MR. ADAMS: No objection.

9 CHAIRPERSON MILLER: Okay.  
10 Respondent's Exhibit K is admitted.

11 (Whereupon, the document marked as  
12 Respondent Exhibit K was received  
13 in evidence.)

14 MR. LeFANDE: May I approach the  
15 witness, Madam Chair?

16 CHAIRPERSON MILLER: Yes.

17 BY MR. LeFANDE

18 Q Do you recognize this document?

19 A Yes, I do.

20 Q Okay. And could you describe for  
21 the Board what this document is?

22 A This is another email chain from

1 myself to Sergeant Rogers.

2 Q Turning your attention to the  
3 lower half of the page, do you see an email  
4 from yourself?

5 A Yes, I do.

6 Q And what is the date of that  
7 email?

8 A It says April 17 --

9 Q And --

10 A -- 2014.

11 Q -- who is it addressed to?

12 A To Sergeant Rogers.

13 Q And what is it that you are saying  
14 to Sergeant Rogers in that email?

15 A It says, "Good morning, Mr.  
16 Rogers. Just wanted to check in with you in  
17 reference to any additional outstanding  
18 invoices that remain. I have requested from  
19 you a copy of any 157s to support subject  
20 matter, but have not received any information  
21 at this time. Can you, please, let me know  
22 what you need me to do in order for us to move

1 forward? Thank you. Willie Blakeney, The  
2 Scene."

3 Q What is a 157?

4 A A 157 is, I would say, a time  
5 sheet of the officers.

6 Q So in this instance, you are again  
7 asking for the documentation to support the  
8 invoices that have already been tendered to  
9 you, which you are concerned may be  
10 inaccurate?

11 A Yes, sir.

12 Q And as of April 17th, you had not  
13 received those?

14 A No, sir, I hadn't.

15 Q Thank you. And did Sergeant  
16 Rogers have -- respond to your inquiry?

17 A No, I don't see it here.

18 MR. LeFANDE: May I approach the  
19 witness?

20 CHAIRPERSON MILLER: Yes.

21 A Okay. Okay.

22 BY MR. LeFANDE

1           Q           Again, do you see towards the  
2 middle of the page a response from Sergeant  
3 Rogers?

4           A           Yes, I do.

5           Q           Okay. And what did he say?

6           A           "I have sent December, January and  
7 February previously. Which dates do you  
8 need?"

9           Q           Well, doesn't Exhibit K show that  
10 you asked for other dates than that, the last  
11 exhibit we looked at?

12          A           Yes, sir.

13          Q           Okay. And did you inform Sergeant  
14 Rogers of that?

15          A           Yes, I did.

16          Q           And on the same date?

17          A           Yes, sir.

18          Q           And what did you say to him?

19          A           I said "On 4/9/14 I sent you an  
20 email and referenced the last two invoices  
21 that were outstanding. Those were the October  
22 13th Invoice 2378 also November" 13 --

1 "November 2013 Invoice 2449. All others were  
2 revised and paid. I will resend that email to  
3 you, so that you can reference the direct  
4 dates within those months. Thank you. Willie  
5 Blakeney."

6 Q So doesn't Exhibit K show that he  
7 already had that information back on May 9th?

8 A Yes, sir.

9 Q I'm sorry, on April 9th? But his  
10 response to you doesn't show any cognizance of  
11 that whatsoever, does it?

12 A Right. No, sir.

13 Q Okay. So this document accurately  
14 reflects your interaction with -- your  
15 correspondence with Sergeant Rogers on April  
16 17th. Is that correct?

17 A Yes, sir.

18 Q Okay. Madam Chair, I ask what has  
19 been previously marked for identification as  
20 Respondent's Exhibit L be entered into  
21 evidence as Respondent's Exhibit L.

22 MR. ADAMS: No objection.

1 CHAIRPERSON MILLER: Okay.

2 Respondent's Exhibit L is admitted.

3 (Whereupon, the document marked as  
4 Respondent Exhibit L was received  
5 in evidence.)

6 MR. LeFANDE: May I approach the  
7 witness?

8 CHAIRPERSON MILLER: Yes.

9 BY MR. LeFANDE

10 Q I show you what has previously  
11 marked as Respondent's Exhibit M. Do you  
12 recognize this document?

13 A Yes, sir.

14 Q And did you, in fact, as you  
15 indicated in your previous email that you re-  
16 forwarded this information to Sergeant Rogers?

17 A Yes.

18 Q And on what date did you do that?

19 A This is April 9, 2014.

20 Q Okay. Looking at the top of the  
21 page there when you re-forwarded it, do you  
22 see the date that you resent it to Sergeant

1 Rogers?

2 A April 17, 2014.

3 Q So did you, in fact, resend this  
4 information to Sergeant Rogers on April 17th?

5 A Yes, I did.

6 Q And this document accurately  
7 represents that email to Sergeant Rogers?

8 A Yes, sir.

9 MR. LeFANDE: Madam Chair, I ask  
10 what has been previously marked for  
11 identification as Respondent's Exhibit M be  
12 entered into evidence as Respondent's Exhibit  
13 M.

14 MR. ADAMS: No objection.

15 CHAIRPERSON MILLER: Okay.

16 Respondent's Exhibit M is admitted.

17 (Whereupon, the document marked as  
18 Respondent Exhibit M was received  
19 in evidence.)

20 MR. LeFANDE: May I approach the  
21 witness?

22 CHAIRPERSON MILLER: Yes.

1 BY MR. LeFANDE

2 Q I'm showing you what has been  
3 previously marked for identification as  
4 Respondent's Exhibit N, as in Nora, November  
5 if you are in the military. Do you recognize  
6 this document?

7 A Yes, I do.

8 Q And what is this document?

9 A This is an invoice for the police  
10 detail.

11 Q And what is the date of that  
12 invoice?

13 A November 7, 2013.

14 Q Again, if you just have a little  
15 closer look at the date that the invoice was  
16 issued, not the date of --

17 A Oh, October, October 8, 2013.

18 Q Okay. And I'm going to show you  
19 another document in short order here, if I may  
20 approach, what has been marked for  
21 identification as Respondent's Exhibit O.  
22 Does that have the same invoice numbers --

1           A           Invoice numbers.

2           Q           -- on it?

3           A           Yes, sir, it does.

4           Q           Okay. So, if you can tell me  
5 then, what is the difference between these two  
6 documents?

7           A           One is significantly -- it doubled  
8 from the looks of it.

9           Q           Okay. Looking at the-- on  
10 Respondent's Exhibit O, and looking under  
11 activity, the last line under activity, if you  
12 could read that for us, please?

13          A           The last line under activity?

14          Q           The column activity. May I  
15 approach?

16                   CHAIRPERSON MILLER: Yes.

17          A           "Revised May 13, 2014."

18          Q           Okay. So this invoice was  
19 originally received by you on October -- or on  
20 or about October 8, 2013, but was not, in  
21 fact, revised until what date?

22          A           May 13, 2014.

1 Q Just a couple weeks ago then. Is  
2 that correct?

3 A Yes, sir.

4 Q Okay. And the amount of the  
5 invoice total changed significantly during  
6 that time?

7 A \$14,487.20.

8 Q Okay. That would be the account  
9 balance. If you just look a little higher up  
10 to the invoice, what's that subtotal there?

11 A \$6,463.52.

12 Q All right. And the original  
13 invoice total was on Exhibit N?

14 A \$7,132.16.

15 Q So there was a significant  
16 modification to the amount that was due  
17 between these two invoices. And when did you  
18 finally receive the corrected invoice?

19 A On May 13, 2014.

20 Q Very good. May I approach?

21 CHAIRPERSON MILLER: Yes.

22 Q I'm showing you what has been

1 marked as -- for identification as  
2 Respondent's Exhibit P. Did you then, in  
3 fact, pay the revised invoice?

4 A Yes, sir, I did.

5 Q And what date did you pay that  
6 revised invoice?

7 A This was on May 20, 2014.

8 Q Just a week after it was issued?

9 A Yes.

10 Q And what means did you pay that  
11 invoice?

12 A Excuse me?

13 Q By what means, what method of  
14 payment?

15 A By certified check.

16 Q Okay. And is that correctly and  
17 accurately reflected in Respondent's Exhibit  
18 P?

19 A Yes, sir.

20 MR. LeFANDE: Okay. Madam Chair,  
21 I ask that Respondent's Exhibit N, that has  
22 been previously marked for identification as

1 Respondent's Exhibit N, the original Invoice  
2 2378, what has been previously marked for  
3 Respondent's Exhibit O, Invoice 2378 as  
4 revised on May 13th and what has been  
5 previously marked for identification as  
6 Respondent's Exhibit P, the receipt for the  
7 certified check in payment thereof, be moved  
8 into evidence as Respondent's Exhibit N, O and  
9 P, respectively.

10 MR. ADAMS: The District has no  
11 objections to Exhibits N and O. The District  
12 does object to Exhibit P, as it's beyond the  
13 scope of the present proceedings. In this  
14 case, all actions occurred by May 17th. This  
15 is -- it looks like it is a payment that was--  
16 that apparently was on May 20th, which is  
17 after, essentially, the fact of the closure in  
18 this case.

19 MR. LeFANDE: The evidence has  
20 demonstrated that a correct invoice was not  
21 tendered to the respondent's company until a  
22 handful of days before this incident. And

1 that it was promptly paid thereafter. The  
2 evidence of the respondent will further  
3 demonstrate that such payments were tendered  
4 even in advance of receiving these invoices  
5 and that there has been prompt attention  
6 brought -- made by the respondent to the  
7 invoices once they were corrected.

8 And that the -- it has been the  
9 police department and the Office of the Chief  
10 Financial Officer who have been consistently  
11 dilatory and inaccurate in their maintenance  
12 of these billing records through no fault  
13 whatsoever of the respondent. And that he has  
14 -- that the company has maintained prompt  
15 billing once these billing discrepancies have  
16 been resolved.

17 And we are going to go through  
18 several of these invoices where that  
19 discrepancy is not even addressed by the  
20 Metropolitan Police Department and the Office  
21 of the Chief Financial Officer, until just a  
22 handful of days before this incident. And

1 that there is no proper invoice. There was no  
2 proper invoice before the respondent to pay  
3 and that the withholding of the services in  
4 light of the inaccurate, and perhaps false  
5 recording of these invoices by the police  
6 department and the Office of the Chief  
7 Financial Officer --

8 CHAIRPERSON MILLER: Okay. I've  
9 heard enough.

10 MR. LeFANDE: -- was --

11 CHAIRPERSON MILLER: I have heard  
12 enough.

13 MR. LeFANDE: -- improper.

14 CHAIRPERSON MILLER: I'm going to  
15 admit it.

16 MR. LeFANDE: Thank you.

17 CHAIRPERSON MILLER: Okay. Thank  
18 you.

19 (Whereupon, the documents marked  
20 as Respondent Exhibit N, O and P  
21 were received in evidence.)

22 MR. LeFANDE: May I proceed?

1 CHAIRPERSON MILLER: Okay.

2 MR. LeFANDE: May I proceed?

3 CHAIRPERSON MILLER: Yes, please.

4 MR. LeFANDE: May I approach the  
5 witness?

6 CHAIRPERSON MILLER: Yes.

7 BY MR. LeFANDE

8 Q I'm showing you what has been  
9 previous marked for identification as  
10 Respondent's Exhibit Q. Do you recognize this  
11 document?

12 A Yes, sir, I do.

13 Q Okay. And can you tell me the  
14 date of -- sorry, let me strike that.

15 What is this document?

16 A This is an invoice for the police  
17 detail.

18 Q And what is the date of the  
19 invoice?

20 A November 4, 2013.

21 Q And what is the amount of that  
22 invoice?

1           A           \$8,023.68.

2           Q           Is this, in fact, one of the  
3 invoices that you protested the accuracy of to  
4 Sergeant Rogers?

5           A           Yes, sir.

6                   MR. LeFANDE: Okay. May I approach  
7 the witness?

8                   CHAIRPERSON MILLER: Yes.

9           BY MR. LeFANDE

10          Q           I'm showing you what has been  
11 marked for identification as Respondent's  
12 Exhibit R. Is this, in fact, the revised  
13 invoice that you received after you protested  
14 the amount?

15          A           Yes, sir, it is.

16          Q           And what was the date of the  
17 revision?

18          A           May 13, 2014.

19          Q           Just a few days before the  
20 incident in question. Is that correct?

21          A           Yes, sir.

22          Q           This is the wrong one. I made a

1 mistake here. No, this isn't right. Yes,  
2 that's wrong. I'll put that aside for now.  
3 The Board's indulgence, please. Do these two  
4 invoices accurately reflect the documents that  
5 you received respectively on or about November  
6 4th and on or about May 13th?

7 A Yes, they are.

8 Q Okay. I ask that what has been  
9 previously marked for identification as  
10 Respondent's Exhibit Q, and Respondent's  
11 Exhibit R be entered into evidence as the  
12 Respondent's Exhibits, respectively, Q and R.

13 MR. ADAMS: No objection.

14 CHAIRPERSON MILLER: Okay.

15 Respondent's Exhibits Q and R are admitted.

16 (Whereupon, the documents marked  
17 as Respondent Exhibit Q and R were  
18 received in evidence.)

19 MR. LeFANDE: May I approach the  
20 witness?

21 CHAIRPERSON MILLER: Yes.

22 BY MR. LeFANDE

1           Q           I'm showing you what has been  
2 previously marked for identification as  
3 Respondent's Exhibit T. Do you recognize this  
4 document?

5           A           Yes, sir, I do.

6           Q           And what is that document?

7           A           This is also the invoice for the  
8 police detail.

9           Q           Okay. And what is the date of  
10 that invoice?

11          A           This is January 10, 2014.

12          Q           Is this, in fact, one of the  
13 invoices that you disputed with the police  
14 department?

15          A           Yes, sir, it is.

16          Q           And did there come a time that you  
17 received a revised invoice from them?

18          A           Yes.

19                   MR. LeFANDE: May I approach the  
20 witness?

21                   CHAIRPERSON MILLER: Yes.

22                   BY MR LeFANDE

1           Q           I'm showing you what has been  
2 marked -- previously marked for identification  
3 as Respondent's Exhibit U, as in uniform. Do  
4 you recognize that document?

5           A           Yes, sir. This is the revised  
6 invoice.

7           Q           And what was the date of the  
8 revision?

9           A           April 8, 2014.

10          Q           Okay. Now, did there come a time  
11 that you paid that invoice?

12          A           Yes, sir, I did.

13          Q           Okay. Approaching the witness.  
14 I'm showing you what has been previously  
15 marked as Respondent's Exhibit V, as in  
16 Victor. Do you recognize that document?

17          A           Yes, sir, I do.

18          Q           What is that document?

19          A           This is a certified check for  
20 Invoice 2565.

21          Q           And, sir, what is the date of  
22 that?

1           A           April 9, 2014.

2           Q           And can you tell us how long after  
3 receiving the revised invoice that that check  
4 was mailed?

5           A           The very next day.

6           Q           The very next day?

7           A           Yes, sir.

8           Q           And you did, in fact, pay that  
9 invoice the very next day after receiving the  
10 correct revised copy?

11          A           Yes, sir.

12                   MR. LeFANDE: Madam Chair, I ask  
13 what has been previously marked for  
14 identification as Respondent's Exhibit T, U  
15 and V be entered into evidence as the  
16 Respondent's Exhibits T, U and V,  
17 respectively.

18                   CHAIRPERSON MILLER: Okay. Not  
19 hearing any objection --

20                   MR. ADAMS: Sorry, no objection.

21                   CHAIRPERSON MILLER: No objection?

22                   MR. ADAMS: No objections.

1 CHAIRPERSON MILLER: All right.  
2 Respondent's Exhibits T, U and V are admitted  
3 into evidence.

4 (Whereupon, the documents marked  
5 as Respondent Exhibit T, U and V  
6 were received in evidence.)

7 MR. LeFANDE: May I approach the  
8 witness, please?

9 CHAIRPERSON MILLER: Yes.

10 BY MR. LeFANDE

11 Q I'm showing you what has been  
12 marked for identification as Respondent's  
13 Exhibit W. Do you recognize this document?

14 A Yes, sir, I do.

15 Q And what is that document?

16 A It's another invoice for the MPD  
17 Police Detail.

18 Q And was this an invoice which you  
19 disputed?

20 A Yes, sir.

21 Q Okay. May I approach the witness?

22 CHAIRPERSON MILLER: Yes.

1           Q           I'm showing you what has been  
2 previously marked for identification as  
3 Respondent's Exhibit X. Did there come a time  
4 that you received a revised invoice for this  
5 particular time period?

6           A           Yes, sir.

7           Q           And between -- what was the date  
8 of that revision?

9           A           February 20, 2014.

10          Q           And calling your attention to the  
11 amount of the two invoices, is there a  
12 difference in the two invoices?

13          A           Yes, sir, it is.

14          Q           Okay. And looking again at the  
15 invoice totals, is there a difference between  
16 the two invoice totals?

17          A           The totals, no.

18          Q           Okay. So drawing your attention  
19 to the activity, is there a revision as to the  
20 dates that are billed for this particular  
21 invoice?

22          A           No, sir, there isn't.

1           Q           Looking at the last line there of  
2 Exhibit W, I'm drawing your attention -- may  
3 I approach the witness again?

4                       CHAIRPERSON MILLER:   Um-hum, yes.

5           Q           Has there been a revision as to  
6 the dates that were billed?

7           A           Yes, sir.

8           Q           And can you tell us what that  
9 revision was?

10          A           There were revised dates that were  
11 in question.

12          Q           Okay.  And does -- Exhibit W, is  
13 there a date -- is there an amount billed for  
14 December 31st?

15          A           Yes, it is.

16          Q           Okay.  And also on Exhibit W, is  
17 there an amount billed for January 1st?

18          A           No, it isn't.

19          Q           Okay.  Turning your attention to  
20 Exhibit X, is there an amount billed for  
21 December 31st?

22          A           No, it isn't.

1           Q           And is there an amount billed for  
2           January 1st?

3           A           Yes, it is.

4           Q           Okay. So there has been a change  
5           in a date there from December 31st to January  
6           1st. Is that correct?

7                       MEMBER ALBERTI: Yes, sir.

8           Q           That's` the revision without the  
9           amount actually changing?

10          A           Yes, sir.

11          Q           So did you -- even though this  
12          amount did not change, did you pay the bill  
13          anyway?

14          A           Yes, sir, I did.

15          Q           Okay. May I approach the witness?

16                       CHAIRPERSON MILLER: Yes.

17          Q           I'm showing what has been  
18          previously marked for identification as  
19          Respondent's Exhibit Y. Do you recognize this  
20          document?

21          A           Yes, sir, I do.

22          Q           And what is that?

1           A           It's a copy of the certified check  
2           that I used to pay Invoice 2623.

3           Q           And you received the revised --  
4           you testified that you received the revised  
5           version of Invoice 2623 on or about February  
6           20th. When did you pay that bill?

7           A           The bill was paid on March 4,  
8           2014.

9           Q           Even though there was no change in  
10          the actual amount there?

11          A           Yes, sir.

12                   MR. LeFANDE: Madam Chair, I ask  
13          what has been previously marked for  
14          identification as Respondent's Exhibit W, X  
15          and Y to be entered into evidence as the  
16          Respondent's Exhibits W, X and Y,  
17          respectively.

18                   MR. ADAMS: No objection.

19                   CHAIRPERSON MILLER: Okay.  
20          Respondent's Exhibits W, X and Y are admitted  
21          into evidence.

22                   (Whereupon, the documents marked

1 as Respondent Exhibit W, X and Y  
2 were received in evidence.)

3 MR. LeFANDE: The Board's  
4 indulgence. May I approach the witness?

5 CHAIRPERSON MILLER: Yes.

6 BY MR. LeFANDE

7 Q I'm showing you what has been  
8 previously marked for identification as the  
9 Respondent's Exhibit Z, as in zebra. Do you  
10 recognize this document?

11 A Yes, sir, I do.

12 Q Well, what is that document?

13 A This is another invoice for the  
14 reimbursable detail, Invoice No. 2624.

15 Q And what is the date of that  
16 invoice?

17 A It's dated February 6, 2014.

18 Q And did there come a time that you  
19 challenged the accuracy of that invoice?

20 A Yes, sir.

21 Q I'm approaching the witness. I'm  
22 showing you what has been marked for

1 identification as Respondent's Exhibit AA. Do  
2 you recognize that document?

3 A Yes, sir, I do.

4 Q And what is that document?

5 A This is the revised invoice for  
6 the reimbursable detail, Invoice 2624.

7 Q Approach the witness. I'm showing  
8 you what has been previously marked for  
9 identification as Respondent's Exhibit BB. Do  
10 you recognize that document?

11 A Yes, sir, I do.

12 Q Okay. So did there come a time  
13 upon receiving the revised invoice that you  
14 paid that invoice?

15 A Yes, sir.

16 Q Okay. And what was the  
17 approximate date that you received the revised  
18 invoice?

19 A March 14, 2014.

20 Q And when would you have paid the  
21 invoice?

22 A March 25, 2014.

1           Q           And what was your means of  
2           payment?

3           A           Certified check.

4           Q           And does this document, exhibit --  
5           what has been marked as Respondent's Exhibit  
6           BB, accurately reflect that certified check  
7           that you used for such payment?

8           A           Yes, sir, it does.

9           Q           Madam Chair, I ask that what has  
10          been previously marked for identification as  
11          Respondent's Exhibits Z, AA and BB be entered  
12          into evidence as Respondent's Exhibits Z, AA  
13          and BB, respectively.

14                   MR. ADAMS: No objection.

15                   CHAIRPERSON MILLER: Okay.

16          Respondent's Exhibits Z, AA and BB are  
17          admitted into evidence.

18                   (Whereupon, the documents marked  
19                   as Respondent Exhibit Z, AA and BB  
20                   were received in evidence.)

21          Q           May I approach the witness?

22                   CHAIRPERSON MILLER: Yes.

1           Q           I'm showing you what has been  
2           previously marked as Respondent's Exhibit CC.  
3           Do you recognize this document?

4           A           Yes, sir, I do.

5           Q           Is this a -- and tell us what that  
6           document may be.

7           A           This is a statement with several  
8           different invoices that were included.

9           Q           Who is that from?

10          A           I think this is from the Office of  
11          Chief Finance Officer or the Metropolitan  
12          Police Department Reimbursable Detail  
13          Division.

14          Q           Do you recognize the invoice  
15          numbers on this document?

16          A           Yes, sir, I do.

17          Q           Okay. Are there any invoices on  
18          this statement from the police department that  
19          you -- that have not been paid after being  
20          revised?

21          A           After being revised, no, sir.

22                       MR. LeFANDE: Thank you. I ask

1 that what has been previously marked for  
2 identification as Respondent's Exhibit CC be  
3 entered into evidence as Respondent's Exhibit  
4 CC.

5 MR. ADAMS: No objections.

6 CHAIRPERSON MILLER: Okay.

7 Respondent's Exhibit CC is entered or admitted  
8 into evidence.

9 (Whereupon, the document marked as  
10 Respondent Exhibit CC was received  
11 in evidence.)

12 Q You previously testified that you  
13 had used -- you had employed the reimbursable  
14 detail for several years, since the inception  
15 of your business, the establishment known as  
16 The Scene.

17 A Yes, sir, I have.

18 Q Have you done so voluntarily?

19 A Yes, sir.

20 Q However, we just heard a great  
21 deal of testimony and evidence that there was  
22 a great deal of inconsistency between the

1 number of officers that were requested and the  
2 number of officers that showed up at your  
3 establishment over the last year or so. Is  
4 that correct?

5 A Yes, sir.

6 Q Okay. Have there been any  
7 incidents at your establishment with regards  
8 to the conduct of the officers appearing for  
9 the reimbursable detail that have come to your  
10 attention?

11 A Yes, sir.

12 MR. ADAMS: Objection. Relevance.

13 CHAIRPERSON MILLER: Okay. What's  
14 the relevance?

15 MR. LeFANDE: We are going to get  
16 to why the officers aren't showing up.

17 MR. ADAMS: Objection. Frankly, I  
18 mean, I think, frankly, we have gone through  
19 an hour of going through this accounting  
20 situation in terms of credits versus non-  
21 credits. Again, in terms of the numbers or  
22 discrepancies, frankly, I'm not sure how the

1 subject matter is germane to this case outside  
2 of figuring out an amount due.

3 It really -- I'm not sure how that  
4 -- how us going through how many officers have  
5 come at one time or the other is germane. So  
6 I object to the relevance.

7 MR. LeFANDE: One of the District's  
8 primary points of contention here is that no  
9 officers showed up that were on a detail on  
10 the morning of May 17th. We have shown that  
11 the respondent has been particularly diligent  
12 in keeping up with the monies owed to the  
13 District of Columbia for the services that  
14 were requested and received.

15 What we haven't seen is either  
16 authorization under the law for the District  
17 of Columbia to withhold police details  
18 otherwise received when there are invoices  
19 that are being properly disputed. And we have  
20 not seen any explanation as to why these  
21 officers were not showing up in the first  
22 place.

1                   We have some very compelling  
2                   evidence here to show that starting in 2011  
3                   and also in 2012, there have been incidents  
4                   involving the conduct of the police officers  
5                   on this reimbursable details to which the  
6                   respondent has either participated in the  
7                   investigation against -- regarding such  
8                   misconduct or made the complaint regarding  
9                   such conduct himself.

10                   And we would posit to the Board  
11                   that these services are being improperly  
12                   withheld in retaliation for such complaints.  
13                   And we have, first of all, a lawsuit filed  
14                   against a police officer who was working at  
15                   the nightclub and threw a woman down a flight  
16                   of stairs injuring her.

17                   The evidence against that officer  
18                   was largely garnered from the DVR equipment  
19                   maintained by the respondent. There has been  
20                   spoken voiced threats to this respondent that  
21                   his participation in both the civil claims and  
22                   in investigation by the Metropolitan Police

1 Department's Department of Internal Affairs as  
2 to the conduct of those officers and the  
3 absence of certain officers when they were  
4 billing the client for the services has been  
5 perceived as hostile to those officers and for  
6 this reason have refused to appear at the  
7 reimbursable detail.

8           It is in very recent memory that we  
9 were before this Board in another situation in  
10 which the Chief of Police on September 22,  
11 2012 stated that despite the establishment  
12 having 8 members working a reimbursable detail  
13 outside of the premises, the Chief of Police  
14 complained about a shooting that occurred up  
15 by the bridge off of Queens Chapel Road, which  
16 she improperly attributed to the conduct of  
17 the nightclub.

18           I, before this Board, tendered  
19 evidence that those officers were sitting on  
20 their cars while crimes were occurring in  
21 their presence, which eventually escalated  
22 into some of the incidents that were

1 complained of here.

2           Once again, this testimony and that  
3 complaint regarding the conduct of the  
4 officers which the respondent is paying for  
5 has provoked what we perceive to be  
6 retaliatory conduct by the police department,  
7 first, in having officers fail to show up for  
8 the details that are requested. And then when  
9 that inconsistency is protested, cutting off  
10 the services in their entirety.

11           And if that's not germane to this  
12 inquiry, I don't know what is.

13           MR. ADAMS: All right. May I be  
14 heard?

15           CHAIRPERSON MILLER: Yes.

16           MR. ADAMS: Well, the petitioner  
17 has three points. First point, based upon the  
18 evidence that has been placed in front of the  
19 Board thus far, we have -- to the extent that  
20 there is -- that the establishment has a  
21 certain offense, we have been talking about  
22 issues regarding the amount of monies paid

1       versus the amount of monies not paid.

2                   And now, the evidence in front of  
3       the Board is, obviously, that such payments  
4       are to be made in advance, not in retrospect  
5       as being led here.

6                   So in terms of dealing with the  
7       idea of why officers are showing up or not  
8       showing up, which is, I think based upon the  
9       evidence admitted -- has been credited based  
10      upon whether people are absent or are present,  
11      which is -- the only issue again is how much  
12      is the amount, that's -- I mean, to the extent  
13      that the Board is willing to listen to this  
14      evidence regarding the amount to be billed,  
15      that's about -- that's it.

16                  Secondly, in terms of the evidence  
17      -- secondly, Mr. -- well, frankly, at this  
18      point on the record, there hasn't been a  
19      proper, how can I say it, discussion of -- I  
20      guess from the Rules of Evidence in terms of  
21      what is to be presented. Essentially, what we  
22      had go onto the record is the purported

1 evidence itself.

2 Now, based upon the testimony here,  
3 it looks like we are down to our last witness.  
4 I'm not sure if there is anyone who could be  
5 qualified to talk about who would -- the  
6 motivations of the Metropolitan Police  
7 Department in terms of, you know, whether  
8 people show up or why they didn't show up.

9 But the bottom line, why MPD  
10 officers or certain officers may have shown up  
11 or not shown up is irrelevant, because,  
12 frankly, we are not even going to get into the  
13 matter of days. And then, frankly, I'm not  
14 sure whether or not, at this point, based upon  
15 the counsel's statements that although the  
16 owner has been here in the hearing room the  
17 whole time, whether the statements are so  
18 broad that it has actually tainted any future  
19 testimony by the witness on the issues that  
20 counsel hopes to relay.

21 So those are my comments. The  
22 bottom line is we are going way far afield.

1                   CHAIRPERSON MILLER: Okay. What I  
2 would like to say is, you know, we are almost  
3 at the end of this hearing and the Board has  
4 to decide afterwards whether or not to lift  
5 the suspension. The basic question that we  
6 have to answer is whether there is an imminent  
7 danger if we lift the suspension.

8                   And I have to say that I have heard  
9 a lot of testimony, but not that much that  
10 really goes to that issue, as far as I can  
11 recall. Maybe you can recap.

12                   So if your point is you have some  
13 point about -- I understand there is a  
14 question about whether or not the  
15 establishment was at fault for not having  
16 reimbursable detail, I know that's one of the  
17 issues and that's a big issue that you are  
18 addressing.

19                   Okay. I got that. And I got that  
20 you showed the whole track record of how he  
21 tried to pay. I can see the relevance of  
22 that.

1                   So my question is I'm not sure  
2                   where you are going though next. Are you  
3                   going to have this witness testify that based  
4                   on his personal knowledge the reimbursable  
5                   detail refused to --

6                   MR. LeFANDE: That members of the  
7                   reimbursable detail --

8                   CHAIRPERSON MILLER: -- if you --

9                   MR. LeFANDE: -- have refused to  
10                  participate in the detail, because, in part,  
11                  of his cooperation in the ongoing civil  
12                  litigation against --

13                 CHAIRPERSON MILLER: Okay. I don't  
14                 want you to go -- say any more about what he  
15                 might testify to. I just want to figure out  
16                 whether there is some relevance here to allow  
17                 him to go into that area of the police  
18                 refusing to, MPD, the reimbursable detail  
19                 refusing to be there.

20                 So if they refused to be there,  
21                 then that goes to your establishment or your  
22                 client's fault or lack of fault --

1 MR. LeFANDE: Yes.

2 CHAIRPERSON MILLER: -- in having  
3 them there. Okay. But you can only go so far  
4 with this. You can't go into -- you know,  
5 sometimes some speculation is okay, but if you  
6 are going to go on and speculate too much  
7 about the motives, like you said or like Mr.  
8 Adams said about MPD, I think that's probably  
9 going to go too far.

10 MR. LeFANDE: We have a lawsuit  
11 that is in Superior Court. It's a matter of  
12 public record. It's a matter of public  
13 record. It involves these very people and  
14 this witness has direct testimony as to his  
15 involvement in that and this Board may take  
16 notice of prior defenses to the prior Summary  
17 Suspension Hearing to which the Metropolitan  
18 Police Department Chief of Police says there  
19 is eight people working for him on that  
20 evening and yet, they still blame him for the  
21 events that occurred on that evening.

22 And we assert that these complaints

1 about --

2 CHAIRPERSON MILLER: No, this is --  
3 I don't want to hear closing argument, this  
4 sounds like at this point. Why don't we let  
5 the witness address your issue, but, you know,  
6 to a limited extent.

7 MR. LeFANDE: We're almost done.

8 CHAIRPERSON MILLER: Okay.

9 MR. LeFANDE: I've got 10 more  
10 minutes and we're out of here.

11 CHAIRPERSON MILLER: All right.

12 MR. LeFANDE: Or we're on to  
13 closing argument.

14 CHAIRPERSON MILLER: Okay.

15 MR. ADAMS: We will still cross.

16 CHAIRPERSON MILLER: What? Right,  
17 exactly.

18 MR. ADAMS: We've got -- we're  
19 going to be permitted.

20 MR. LeFANDE: Okay. We did not  
21 initiate this proceeding.

22 MR. ADAMS: Well, we're going to

1 finish it.

2 MR. LeFANDE: May I approach the  
3 witness?

4 CHAIRPERSON MILLER: Yes.

5 BY MR. LeFANDE

6 Q Do you -- I'm showing you what has  
7 been previously marked for identification as  
8 Respondent's Exhibit FF. Do you recognize  
9 this document?

10 MR. ADAMS: Actually, I apologize,  
11 I don't have a copy of that.

12 MR. LeFANDE: Oh, yes, you are  
13 absolutely right.

14 MR. ADAMS: I apologize.

15 MR. LeFANDE: That is here, right  
16 here. I'm sorry.

17 MR. ADAMS: Thank you.

18 MR. LeFANDE: I got caught up in  
19 the moment. I apologize. You have to have a  
20 second to have a look at these.

21 CHAIRPERSON MILLER: Are we waiting  
22 for something?

1 MR. LeFANDE: I'm waiting for him

2 --

3 CHAIRPERSON MILLER: Oh, okay.

4 MR. LeFANDE: -- the opportunity to  
5 have a look at documents.

6 MR. ADAMS: I'm ready.

7 MR. LeFANDE: Okay.

8 Q Thank you. Sir, do you recognize  
9 this document?

10 A Yes, sir, I do.

11 Q And what is this document?

12 A This is literature from the civil  
13 case that was in the Superior Court for an  
14 incident that occurred at The Scene Nightclub.

15 Q And --

16 MR. ADAMS: Objection. Relevance  
17 as to the civil suit to the determination of  
18 the issues before the Board.

19 MR. LeFANDE: I have already  
20 thoroughly addressed that. Thoroughly  
21 addressed that on previous --

22 CHAIRPERSON MILLER: Wait a second.

1 Has this been resolved by the Court?

2 MR. LeFANDE: No, no.

3 CHAIRPERSON MILLER: Okay. So this  
4 is related to your retaliation --

5 MR. LeFANDE: Yes, this is the  
6 retaliation --

7 CHAIRPERSON MILLER: -- issue?

8 MR. LeFANDE: -- issue.

9 CHAIRPERSON MILLER: We will see  
10 that in a minute, I gather?

11 MR. LeFANDE: I'm sorry?

12 CHAIRPERSON MILLER: We will see  
13 that in full in the testimony?

14 MR. LeFANDE: In just -- it will be  
15 very short.

16 CHAIRPERSON MILLER: Okay.

17 Overruled.

18 BY MR. LeFANDE

19 Q Is the respondent a party to this  
20 lawsuit?

21 A Excuse me?

22 Q Is the respondent a party to this

1 lawsuit?

2 A Yes.

3 Q The impact -- and, therefore, you  
4 have personal knowledge of the litigation as  
5 it is ongoing today?

6 A Yes, sir, I do.

7 Q Okay. And could you just briefly  
8 tell us what the subject matter of the claim  
9 is in this lawsuit?

10 A It's a lawsuit from the young lady  
11 who was injured at the club at the hands of  
12 the MPD officer who was working the  
13 reimbursable detail.

14 Q And how was -- does she allege she  
15 was injured?

16 A She was thrown down the front  
17 steps of the venue.

18 Q And in the process of this  
19 litigation, have you, or in the process of  
20 investigation of this claim by any party, been  
21 questioned as to what occurred?

22 A Yes, sir.

1 Q Okay. Have you --

2 MR. ADAMS: Objection in terms of  
3 relevancy. And just for the convenience of  
4 the Board, I'll make this a continuing  
5 objection towards any questions regarding this  
6 lawsuit in terms of relevance. I just wanted  
7 to note for the record.

8 MR. LeFANDE: I think we have heard  
9 this objection. It has been overruled.

10 CHAIRPERSON MILLER: Excuse me for  
11 one second. Okay. I just want to ask, in  
12 order to be able to deal with the ongoing  
13 objection, one question and that is I  
14 understand that Mr. Blakeney has said he has  
15 knowledge of the litigation. Does he have  
16 personal knowledge of the underlying facts  
17 that are the subject of the litigation?

18 MR. LeFANDE: Do you want to  
19 address that to the witness or do you want --  
20 or are you asking me?

21 CHAIRPERSON MILLER: I'll ask the  
22 witness then. I would like to know that, at

1 this point, in order to be able to rule --

2 MR. LeFANDE: The question was do  
3 you have personal knowledge of the facts which  
4 are -- form the basis of the claims in the  
5 litigation?

6 A Yes, I do.

7 CHAIRPERSON MILLER: Okay.

8 MR. LeFANDE: More importantly,  
9 what I want to get to is that his  
10 participation in the subsequent investigation  
11 of it is what is of concern to us.

12 CHAIRPERSON MILLER: Okay. All  
13 right.

14 BY MR. LeFANDE

15 Q And did there come a time that you  
16 produced or were responsible for the  
17 production of evidence that supported the  
18 plaintiff's claims?

19 A Yes, sir, I did.

20 Q And what evidence was that?

21 A That was surveillance video from  
22 my digital video recorder.

1           Q           And how did it come to be that you  
2 were responsible for the production of that  
3 evidence?

4           A           Because it occurred on the  
5 property of the venue.

6           Q           And what did that evidence tend to  
7 demonstrate or refute regarding those claims?

8           A           It showed one of the officers from  
9 the reimbursable detail throwing a young lady  
10 down the steps.

11          Q           And did you subsequently -- were  
12 you subsequently questioned by members of the  
13 District of Columbia's Office of Internal  
14 Affairs regarding this incident?

15          A           Yes, sir, I was.

16          Q           And what -- please explain how  
17 that transpired.

18                   MR. ADAMS: Objection. At this  
19 point, the question is regarding questions for  
20 Internal Affairs doesn't -- it doesn't seem to  
21 be as a part of the lawsuit, so now this is a  
22 new subject matter. So I object as to

1 questions regarding Internal Affairs.

2 MR. LeFANDE: This is quite --

3 CHAIRPERSON MILLER: Was the  
4 questioning --

5 MR. LeFANDE: -- we are discussing  
6 retaliation with regards to this very incident  
7 and his participation in the investigation  
8 thereof.

9 CHAIRPERSON MILLER: For  
10 clarification -- I understand that. For  
11 clarification, did the interrogation go to the  
12 facts of this lawsuit?

13 MR. LeFANDE: That's what he just  
14 said.

15 CHAIRPERSON MILLER: That's what  
16 you just said?

17 MR. LeFANDE: That's what the  
18 witness, I believe, just testified to.

19 CHAIRPERSON MILLER: And it's not  
20 beyond the question?

21 MR. LeFANDE: I don't think so.

22 CHAIRPERSON MILLER: It's related

1 to the lawsuit. Okay. Continue. Overruled.

2 BY MR. LefANDE

3 Q And how did it come to be that you  
4 were interrogated by members of the  
5 Metropolitan Police Department Office of  
6 Internal Affairs with regards to the claims in  
7 this lawsuit?

8 A He actually came to the venue and  
9 said he was investigating the incident and the  
10 officers and security who were involved with  
11 the incident directly and indirectly and also  
12 stated that he had attempted to contact three  
13 officers who were listed on the list for the  
14 overtime detail at The Scene that were not  
15 actually there, but they put in paperwork as  
16 working at The Scene on that particular night.

17 Q And did the Office of Internal  
18 Affairs indicate to you why that was  
19 significant to them?

20 A Yes, because it was an ongoing  
21 investigation and he needed to talk to all  
22 parties that were involved.

1           Q           But, in fact, it was learned that  
2 they were not there present whatsoever that  
3 night?

4           A           Yes, sir.

5           MR. ADAMS:   Objection.   Leading.

6           MR. LeFANDE:   He is restating --

7           CHAIRPERSON MILLER:   Okay.

8           Overruled.   Go ahead.

9           MR. LeFANDE:   -- that.

10          MR. ADAMS:   Okay.

11          CHAIRPERSON MILLER:   Yeah.

12          MR. ADAMS:   My bad.   Withdrawn.

13          BY MR. LeFANDE

14          Q           Go ahead.   Noted.   Did there come  
15 a time to which you learned that members of  
16 the Metropolitan Police Department were upset  
17 with your participation in this investigation?

18          A           Yes, sir.

19          Q           And how did you come to learn  
20 this?

21          A           Through an associate who had spoke  
22 with a couple of the officers who were angry

1 about me actually turning in the surveillance.

2 Q And did there come a time where  
3 you learned of threats to you made by  
4 Metropolitan Police officers?

5 A Yes, sir.

6 MR. ADAMS: Objection.

7 MR. LeFANDE: And --

8 MR. ADAMS: Unreliable hearsay.  
9 Objection also in terms of relevance.

10 CHAIRPERSON MILLER: Okay. I'm  
11 going to try to let him finish this, but I  
12 totally -- I'm just going to say this for all  
13 the Board Members that, you know, hearsay is  
14 allowed in administrative proceedings, but we  
15 certainly appreciate that they are not here to  
16 tell their side of the story or be cross-  
17 examined or anything, so we do take this, you  
18 know, and give it the weight it deserves.

19 MR. ADAMS: I just wanted to note  
20 it for the record.

21 CHAIRPERSON MILLER: Yes, okay.

22 BY MR. LeFANDE

1 Q And did there come a time that you  
2 learned of threats being made --

3 A Yes, sir.

4 Q -- against you?

5 A Yes, sir.

6 Q And how did you come to learn  
7 that?

8 A An individual who also hired  
9 reimbursable detail at another venue.

10 Q And what threats were made against  
11 you?

12 A That if this officer was to lose  
13 his job, then I was going to be dealt with.

14 Q Dealt with?

15 A Yes.

16 Q Thank you. And, sorry, what was  
17 that officer's name that they were -- that was  
18 the subject of this lawsuit?

19 A Marcus McCrea.

20 MR. LeFANDE: May I approach the  
21 witness, Madam Chair?

22 CHAIRPERSON MILLER: Yes.

1 BY MR. LeFANDE

2 Q I'm showing you what has been  
3 previously marked for identification as  
4 Respondent's Exhibit GG. Do you recognize  
5 this document?

6 A Yes, sir, I do.

7 Q And what is this document?

8 A This is a Letter of Closure from  
9 the Chief of Police.

10 Q And who is --

11 MR. ADAMS: Objection. Relevance.

12 This is the --

13 CHAIRPERSON MILLER: Okay.

14 MR. ADAMS: -- prior closure letter  
15 from a prior case from September 22, 2012,  
16 which has already been argued and litigated  
17 before this Board. The Board has already made  
18 a decision in that matter.

19 CHAIRPERSON MILLER: I would agree.  
20 We are already off this.

21 MR. LeFANDE: I wanted to make a  
22 proffer as to what the relevance of this

1 document is.

2 CHAIRPERSON MILLER: Okay. We are  
3 already off the date of the litigation. Is  
4 that right?

5 MR. LeFANDE: I will ask that what  
6 has been previously marked for identification  
7 as Respondent's Exhibit FF be entered into  
8 evidence as Respondent's Exhibit FF.

9 MR. ADAMS: The District objects in  
10 terms of relevance.

11 CHAIRPERSON MILLER: Okay. It's a  
12 public record and we are going to let it in.  
13 Okay. I'm going to admit it.

14 (Whereupon, the document marked as  
15 Respondent Exhibit FF was received  
16 in evidence.)

17 CHAIRPERSON MILLER: Let's move on.  
18 But now, we do seem to be in another territory  
19 where we are not going to --

20 MR. LeFANDE: Yeah, this --

21 CHAIRPERSON MILLER: -- revisit  
22 another hearing we had.

1                   MR. LeFANDE:  -- again, this goes  
2                   to the retaliation, the threat of retaliation  
3                   for his complaints that were raised in this  
4                   litigation, in this proceeding before the  
5                   Board.

6                   CHAIRPERSON MILLER:  Do you want to  
7                   ask him his personal knowledge about threats?

8                   MR. LeFANDE:  Well, I think he  
9                   certainly participated in this process and he  
10                  certainly has personal knowledge as to the  
11                  events that occurred, as this Board does, as  
12                  to what defenses were raised in this matter.

13                  CHAIRPERSON MILLER:  And my  
14                  question is though, I gave you a limited area  
15                  to establish that there were threats made.

16                  MR. LeFANDE:  And I have made that  
17                  and I have moved on.

18                  CHAIRPERSON MILLER:  Oh, that's  
19                  done?

20                  MR. LeFANDE:  We're done.

21                  CHAIRPERSON MILLER:  What are you  
22                  moving on to now?

1                   MR. LeFANDE: I think now we are  
2 discussing a separate proceeding in which this  
3 witness has made allegations against the --  
4 regarding the misconduct of the police  
5 officers, which has also led to such  
6 retaliation.

7                   MR. ADAMS: And my point here is  
8 that we literally two years ago argued this  
9 matter before the Board.

10                  CHAIRPERSON MILLER: Okay.

11                  MR. ADAMS: You know, whatever  
12 arguments were made back in October 2012, if  
13 Mr. LeFande is actually trying to reargue that  
14 case, I can't understand how it would  
15 materially determine whether or not there is  
16 imminent danger

17                  CHAIRPERSON MILLER: Right.

18                  MR. ADAMS: -- based upon the March  
19 7 -- the May 17th events.

20                  MR. LeFANDE: This Board may take  
21 judicial -- may take administrative notice of  
22 its own prior proceedings in which this

1 attorney and this witness raised the fact that  
2 despite the fact there being eight members  
3 working a reimbursable detail, and despite the  
4 fact that there being assaults occurring in  
5 the immediate presence of these police  
6 officers, that we had testimony and evidence  
7 that they simply failed to take any police  
8 action and that they were, in fact,  
9 responsible for the escalation of any violence  
10 which the Chief of Police later ascribed to  
11 this establishment.

12 I don't need to elicit testimony  
13 from this witness as to that point, as it is  
14 already a part of the record of this Board's  
15 proceedings.

16 MR. ADAMS: The District agrees.  
17 I mean, if anything was done in prior  
18 testimony, the Board can merely be referred to  
19 a part of the transcript.

20 However, the bottom line, this is  
21 a completely separate proceeding. I think  
22 it's highly inappropriate for -- I mean, more

1 or less the respondent can say whatever he  
2 wants to say. It doesn't mean that it's the  
3 truth.

4 CHAIRPERSON MILLER: Correct.

5 MR. ADAMS: So --

6 MR. LeFANDE: Again, we think  
7 this --

8 CHAIRPERSON MILLER: We --

9 MR. LeFANDE: -- is particularly  
10 germane to the inspector that since the time  
11 of this particular -- the close temporal  
12 relationship between the proceedings that went  
13 on in this case and the complete degradation  
14 of the services that were being provided for,  
15 being paid for by the establishment and  
16 suddenly in 2013, these services and the  
17 participation of these officers seems to drop  
18 off to the point that when he protests that in  
19 early 2014, they are cut off completely.

20 And I see a very close time  
21 relationship between these events. And I  
22 don't think that can be ignored by this Board.

1                   MR. ADAMS: This goes back to the  
2 prior point, no one -- everything is supposed  
3 to be paid in advance. We are talking about  
4 there has been a cut of a few thousand dollars  
5 from thousands of dollars, like almost  
6 \$40,000. Actually, it was \$40,000 worth of  
7 invoices.

8                   I mean, the evidence before the  
9 Board is that the service is discontinued  
10 because there is a lack of payment, not  
11 because though that a couple of people here  
12 are gone one day, because they don't like the  
13 establishment, that's not what the evidence is  
14 before the Board.

15                   CHAIRPERSON MILLER: Okay. So  
16 let's move this along.

17                   MR. LeFANDE: I have my point with  
18 regard to this. I don't think I need to have  
19 any more testimony. I refer to and  
20 incorporate by reference the proceedings in  
21 ABRA's proceeding 12-251-303 with the date of  
22 occurrence of September 22, 2012.

1 I incorporate by reference not only  
2 the testimony of this witness previously with  
3 regards to complaints of the inefficiency and  
4 neglect of the police officers on that date.

5 And I think that the Attorney  
6 General makes a very formidable point which  
7 will be addressed in closing, but this is  
8 about the money for the Metropolitan Police  
9 Department and has absolutely nothing to do  
10 with public safety.

11 CHAIRPERSON MILLER: Okay.

12 MR. LeFANDE: And I have --

13 CHAIRPERSON MILLER: Okay.

14 MR. LeFANDE: -- no further  
15 questions for this witness.

16 CHAIRPERSON MILLER: Okay. You  
17 have a few more questions? No.

18 MR. LeFANDE: No.

19 CHAIRPERSON MILLER: All right.  
20 Wait, before we go -- I'm sorry.

21 MR. ADAMS: That's okay.

22 CHAIRPERSON MILLER: Before we get

1 into your cross, I am just needed for -- we  
2 are needed for a few minutes in the Executive  
3 Boardroom, so you can take a five minute  
4 break.

5 MR. LeFANDE: Thank you.

6 (Whereupon, the above-entitled  
7 matter went off the record at 5:18 p.m. and  
8 resumed at 5:36 p.m.)

9 CHAIRPERSON MILLER: Okay, we're  
10 back on the record. Ready for cross?

11 MR. ADAMS: Yes, I am.

12 CHAIRPERSON MILLER: Okay, good.

13 CROSS EXAMINATION

14 BY MR. ADAMS:

15 Q All right, Mr. Blakeney, thank you  
16 for your patience this afternoon. I have a  
17 few questions. Obviously, there were a lot of  
18 questions presented to you. We have a lot of  
19 information going through. So let's -- so  
20 let's get to it.

21 Now, first of all, during your  
22 direct, you stated that the detail that you --

1 in getting detailed, that you got it -- that  
2 it was done voluntarily, correct?

3 A No, sir.

4 Q You did not -- okay, so you didn't  
5 say you voluntarily by your own volition --

6 MR. LeFANDE: I'm sorry. Can we  
7 have a restatement of the question? It was  
8 extremely confusing to me what he just asked.  
9 Can we just -- the form of the question

10 CHAIRPERSON MILLER: I didn't think  
11 it was confusing, but do you need him to  
12 restate it? You didn't hear it?

13 MR. ADAMS: I'll restate it.

14 CHAIRPERSON MILLER: Okay.

15 Q During direct examination, you  
16 stated that when you first acquired an MPD  
17 detail that you did so voluntarily, correct?

18 A Yes, sir. I did.

19 MR. LeFANDE: That was a lot  
20 clearer.

21 CHAIRPERSON MILLER: Okay.

22 MR. ADAMS: Okay, thank you.

1                   CHAIRPERSON MILLER: Okay.

2                   Q       When did you acquire the MPD  
3 detail? Do you remember the day?

4                   A       I'm sorry. It was possibly five  
5 years ago when we initially opened the venue.

6                   Q       Okay, so, when was that  
7 approximately?

8                   A       I would say in January of 2008.

9                   Q       So, you're saying January of 2008.  
10 Okay, so that's -- all right, so that's six  
11 years. So, now you've -- as the owner, you've  
12 been to the Board prior for hearings on  
13 various matters, correct? Well, let me  
14 correct my -- my statement.

15                             For all hearings regarding this  
16 establishment, you've attended them, right?

17                   A       I don't know what you're saying.

18                   Q       Have you -- in terms of -- well,  
19 let me be more specific. In terms of fact-  
20 finding hearings of summary suspension  
21 hearings before this Board, you've been in  
22 attendance for all of those hearings, correct?

1           A       In reference to the Scene night  
2 club?

3           Q       Exactly.

4           A       Yes, sir.

5           Q       Okay. And so, in July 2010, this  
6 Board held a summary suspension hearing  
7 regarding the establishment. Correct? In  
8 fact -- well, let me be specific. On July 9,  
9 2010, this -- the Board held a summary  
10 suspension hearing regarding the  
11 establishment, correct? Do you remember that?

12          A       No, sir. I don't have anything to  
13 reference the date.

14          Q       Okay. I can provide something to  
15 you, the witness, to refresh his recollection.  
16 I'll -- in fact, I'll provide a copy to --

17                   MR. LeFANDE: Can we please have a  
18 proffer as to what we're doing in July 2010.

19                   CHAIRPERSON MILLER: A proffer as  
20 to what?

21                   MR. LeFANDE: What it is, the  
22 hearing of July 2010? In fact, can we ask

1 that the witness be excused for a moment?  
2 Because I think I know where we're going with  
3 this, and this is not appropriate. If you  
4 want me to argue in front of my own witness  
5 what this is about, I'll do that, but for the  
6 courtesy to the Attorney General, I suggest  
7 that the witness be excused for a moment.

8 CHAIRPERSON MILLER: Okay, you can  
9 step out for a minute, sir, if you don't mind,  
10 rather than arguing this point. Don't go too  
11 far, though. Thank you. Okay, Mr. Adams?

12 MR. ADAMS: The purposes of this  
13 line of questioning is going to the knowledge  
14 of the establishment regarding what was the  
15 understanding of -- of directives of the  
16 Board. I do think that knowing what the  
17 witness' personal knowledge is of it is  
18 appropriate.

19 MR. LeFANDE: District of Columbia  
20 --

21 CHAIRPERSON MILLER: Okay.

22 MR. LeFANDE: -- Title 2, Section

1 509 administrative procedures mandates that  
2 any directive of this Board be in writing and  
3 be accompanied by a finding --

4 CHAIRPERSON MILLER: If you could  
5 --

6 MR. LeFANDE: -- and in conclusions  
7 of law --

8 CHAIRPERSON MILLER: Mr. LeFande,  
9 you argued that in opening statement. You can  
10 argue that in closing statement. So, all that  
11 it at issue is his personal knowledge.

12 MR. LeFANDE: It doesn't exist. If  
13 these orders do not exist, they are not  
14 enforceable, and we -- he is now going down an  
15 absolutely inappropriate line of questioning,  
16 trying to ascribe Board orders to this witness  
17 that do not exist.

18 The law is clear. Either they're  
19 in writing and they -- they are accompanied by  
20 findings of fact and conclusions of law, or  
21 they don't exist. If he wants to ascribe  
22 Board orders that don't exist to this person,

1 that's inappropriate and we need to move on.

2 MR. ADAMS: Well, Mr. LeFande has  
3 noted his objection. However, the fact of the  
4 matter is I asked regarding awareness of  
5 proceedings and the context of the  
6 proceedings, and I believe that the -- that  
7 the witness can testify to the terms. Whether  
8 it's an order or not, that's a matter of law  
9 and we can go --

10 CHAIRPERSON MILLER: Correct.

11 MR. ADAMS: Wait a second. I'm not  
12 finished. We're talking about the knowledge  
13 of how this establishment is to operate.

14 CHAIRPERSON MILLER: I'm sorry.  
15 You're talking about?

16 MR. ADAMS: We're talking about  
17 knowledge of the expectations of how the  
18 establishment is to operate.

19 MR. LeFANDE: Okay, what does that  
20 mean? Either there's an order that he is in  
21 violation of, or there isn't an order he is in  
22 violation of.

1                   CHAIRPERSON MILLER: Okay, that's  
2 your legal argument. Okay, so, I'm going to  
3 note your objection. You can make a recurring  
4 objection, but I'm going to allow the witness  
5 to be asked those questions.

6                   MR. LeFANDE: Okay, Madam Chair.

7                   CHAIRPERSON MILLER: Okay.

8                   CROSS EXAMINATION (Resumed)

9                   BY MR. ADAMS:

10                  Q       All right, I'm going to show you --  
11 I was going to show you pages from a document.  
12 Now, this -- now, the document I've handed to  
13 you, that is the front page of -- I'll give  
14 you a copy here. Here you go, Mr. LeFande.  
15 This is a copy of the document.

16                         Now, the front page -- you stated  
17 that you did not recollect any hearings. I  
18 want you to look at the front page of the  
19 document and see the matter that is at hand,  
20 and the date of the -- the date of it. Have  
21 you --

22                  A       Did you say the date?

1           Q       Yes, and the date. Have you seen  
2       it?

3           A       July 9, 2010?

4           Q       Yes.

5           A       Yes.

6           Q       Now, if you would like to recollect  
7       --

8                   MR. LeFANDE: Recollect?

9           Q       Recollect, yes. I'm sorry, I  
10       apologize. I was distracted by your counsel.  
11       Do you recollect and remember being here in  
12       front of the Board for a hearing?

13          A       I'm actually going to scan through  
14       just to -- because even though I see my name  
15       on the document, I'll scan through.

16                   CHAIRPERSON MILLER: While he's  
17       scanning, Candice, can you identify the  
18       document for the record?

19                   MR. ADAMS: The document I handed  
20       to him is a portion of a transcript from a  
21       July 9, 2010 hearing.

22                   CHAIRPERSON MILLER: For?

1                   MR. ADAMS: For a summary  
2 suspension matter.

3                   CHAIRPERSON MILLER: Okay.

4                   MR. ADAMS: This is Case Number 10-  
5 251-00145.

6                   CHAIRPERSON MILLER: Okay, thank  
7 you.

8           Q       All right, have you had a chance to  
9 scan that?

10          A       I'm still scanning, sir.

11          Q       All right.

12          A       Okay.

13          Q       All right, so, you were here in  
14 July on that date for the hearing, correct?

15          A       Yes.

16          Q       All right, so, the subject matter  
17 was a summary suspension hearing regarding  
18 the establishment, much like what we're doing  
19 today, correct?

20          A       Yes.

21          Q       So, at the end of that hearing, you  
22 do recollect that this -- the Board discussed

1 conditions in terms of lifting the summary  
2 suspension, correct?

3 A You say toward the end of this  
4 hearing?

5 Q At the end of the hearing on July  
6 9, 2010, the Board -- you do recollect that  
7 the Board stated conditions for lifting the  
8 suspension, the summary suspension, correct?  
9 You do remember that?

10 A If it's not documented here, I  
11 don't --

12 Q So, you have no personal knowledge  
13 of what happened at the hearing?

14 A To the best of my recollection, I  
15 don't remember.

16 Q Okay, so you don't recollect in  
17 July of 2010 revising a security plan? You  
18 don't recollect that?

19 A Well, in 2010, I can tell you there  
20 was a partner on board at The Scene at that  
21 time, who --

22 Q Okay. Go ahead. Finish your

1 answer.

2 A -- may have been the lead on this.

3 Q And so, you also did not -- so  
4 you're saying -- so, you do recollect that  
5 this condition regarding the contractual  
6 relationship with TCB and a band, the Polo  
7 Boys, is that -- do you recollect that or you  
8 don't recollect that?

9 A No, not --

10 Q Okay, so -- so, any statements  
11 regarding the Board -- the Board had a  
12 standing assertion that you continue to have  
13 a reimbursable detail, you do not remember  
14 that? You have no personal knowledge of that?

15 A No, sir.

16 Q Okay. And do you recollect that  
17 the summary suspension hearing was continued  
18 on July 14th of 2010? Do you recollect that?

19 A July 14th, 2010?

20 Q Yes.

21 A No, sir. I don't have anything  
22 that I can --

1           Q       Okay, so, in your personal  
2 knowledge you -- you do not recollect?

3           A       Correct.

4           Q       Okay. In September 2010, do you  
5 recollect providing any information to the  
6 Board regarding the summary suspension matter  
7 for 2010?

8           A       Do you have a specific night that  
9 you --

10          Q       I said September 2010.

11          A       September.

12          Q       Do you recollect making submissions  
13 to the Board?

14          A       I don't -- I don't recall, sir.

15                 MR. ADAMS: Okay. I don't have a  
16 copy of this, but I'm going to provide -- show  
17 this to counsel. And I'd like to approach the  
18 witness?

19                 MR. LeFANDE: You don't have a copy  
20 for me?

21                 MR. ADAMS: I do not have a copy.

22                 CHAIRPERSON MILLER: Yes.

1           Q       I'm handing to you a fact-finding  
2 disposition form, dated September 15, 2010.  
3 Does that -- does that help you -- does that  
4 refresh your recollection of -- of any  
5 hearings before this Board?

6           A       Yes, sir.

7           Q       Okay, so, the second page to it is  
8 on your letterhead; it's on The Scene's  
9 letterhead, correct?

10          A       Yes, sir, it is.

11          Q       Now, this states commitments --  
12 agree to commitments made by the establishment  
13 as of September 15, 2010, correct? That's  
14 part of the summary suspension hearing,  
15 correct?

16          A       It doesn't have a date on.

17                   MR. LeFANDE: Objection as to this  
18 entire line of questioning.

19                   CHAIRPERSON MILLER: The objection  
20 was noted. It's a running objection, correct?  
21 Okay.

22          Q       Okay, so you -- so you -- do you

1       recollect that document?

2               A       I don't, and the document is not  
3       dated, sir.

4               Q       So, you've never seen this  
5       document?

6                       MR. LeFANDE:   Instruct --

7               Q       You've never seen this document?

8                       MR. LeFANDE:   Instruct the attorney  
9       general to not badger the witness.   The  
10      question has been asked and answered

11              Q       I won't answer -- ask the question  
12      again.   All right, do you also remember --  
13      now, after you have your hearings, have you  
14      ever received the fact-finding disposition  
15      forms from -- from --

16                      MR. LeFANDE:   Objection as to the  
17      form.

18              Q       Have you -- have you received any  
19      other fact-finding hearing disposition forms?  
20      Do you remember receiving any such forms from  
21      the Board?

22                      MR. LeFANDE:   Objection as to the

1 form.

2 MR. ADAMS: It's pretty clear  
3 what's on the form. So I have nothing to say.

4 CHAIRPERSON MILLER: Overruled.

5 Q Do you remember receiving any of  
6 the fact-finding dispositions forms?

7 A Yes, I do.

8 Q Okay, do you -- do you remember  
9 having a fact-finding after closure in  
10 February 2011?

11 A February 2011?

12 Q 2011.

13 A No, sir. I mean if you have  
14 something I can reference, I'd appreciate it.

15 Q Sure. Sure. No problem. All  
16 right, so, I have a -- I'm approaching the  
17 witness with a fact-finding -- fact-finding  
18 disposition form. The Board can make  
19 references, take official notice of -- of this  
20 form. Now, this is dated February 23rd, 2011.  
21 Do you -- do you recognize this form? Do you  
22 recognize this document, Mr. Blakeney?

1           A       I do, but it -- I don't remember.

2           Q       Okay. Let's see if you recognize  
3 it. According to this document, it requires  
4 a submission of -- a submission of the SP. I  
5 assume that's security plan, and camera  
6 security diagram. Do you recollect receiving  
7 around that date some form of discussion or  
8 directive, or anything of that sort from the  
9 Board at that time?

10          A       No, sir.

11          Q       You don't? Okay, so, in 2011, you  
12 did not update your security plan? Is that  
13 what -- is that what your testimony is today?

14          A       I may have, but I would have to  
15 look at the gradually date change of the  
16 security plans to be sure.

17          Q       Okay, so, it's -- okay.

18          A       And I think the Board would --  
19 would have that on hand if submitted.

20          Q       Okay, you may have, but you don't  
21 know why you did it? Is that -- is that what  
22 your testimony is? You don't know why you

1 did it?

2 A No. I'm not saying I don't know  
3 why we did it.

4 Q Then why did you do it?

5 A They asked for an up-to-date  
6 security plan.

7 Q Okay, so --

8 A And we submit an up-to-date  
9 security plan.

10 Q So, you did do it pursuant to that  
11 February 23rd hearing, right?

12 A I don't remember. It is possible,  
13 but I don't remember us actually updating it  
14 to the point where --

15 Q So, you --

16 A -- we implemented it.

17 Q I apologize.

18 A We implemented the commitment of  
19 eight officers.

20 Q Okay, so you -- so you do remember  
21 there being commitment to eight officers for  
22 MPD --

1           A       No, I said we -- I said we -- I  
2       don't recall us implementing this in a  
3       security plan, an updated security plan.

4           Q       Okay, well, that's not the  
5       question. The question is -- the question is  
6       whether you did do an updated security plan.  
7       That's the first question.

8           A       Well, I would have to go back and  
9       look at my dated security plans.

10          Q       Okay, fair enough. And do you  
11       remember providing camera security diagram as  
12       a result of the February 2011 hearing?

13          A       We always had a camera diagram.

14          Q       Okay, but -- okay. But did you  
15       submit it pursuant to --

16                   MR. LeFANDE: Objection.

17          Q       -- February 23rd, 2011 -- the  
18       February 23rd, 2011 hearing?

19                   MR. LeFANDE: This is very far --  
20       objection. This is very far outside the scope  
21       of direct. He had the opportunity to call  
22       this witness as his direct. This is not

1 anything to do with what was on direct.

2 MR. ADAMS: The fact of the matter  
3 is when we talked about - it goes to  
4 credibility.

5 MR. MOULTON: Overruled. Go ahead.

6 Q Do you -- okay, so the question  
7 again is pursuant to this February 23rd, 2011  
8 hearing, do you remember submitting to the  
9 Board a camera security diagram?

10 A I may have. If we updated cameras  
11 or camera positions, then we may have  
12 submitted an updated --

13 Q So, in terms of the writing here  
14 about commitment to eight officers from the  
15 MPD reimbursable detail on Saturday nights for  
16 four hours, midnight to 4:00 a.m., you do  
17 recollect that being discussed or at least  
18 being an exhortation of the Board as of  
19 February 23rd, 2011, correct?

20 MR. LeFANDE: Objection as to the  
21 form.

22 CHAIRPERSON MILLER: Overruled. Go

1 ahead.

2 THE WITNESS: Could you repeat  
3 that?

4 Q Pursuant to -- so, again, there's  
5 writing here with a commitment to eight  
6 officers for MPD reimbursable detail on  
7 Saturday nights for four hours between  
8 midnight and 4:00 a.m. So, you do -- so, you  
9 do recollect that that was made -- was a  
10 directive or exhortation of the Board as of  
11 February -- February 23rd, 2011? Is that  
12 correct, Mr. Blakeney?

13 A I don't recall based on this, if  
14 this is the directive directly from the Board.  
15 Based on what I'm looking at.

16 Q All right. So, I mean -- I mean  
17 obviously we're asking questions regarding  
18 your detail. So, essentially, what you're  
19 saying here is that you do not recollect any  
20 way, shape or form, any type of exhortations  
21 by this Board, or any discussion by this Board  
22 regarding reimbursable details in your

1 establishment? Is that what your testimony is  
2 today?

3 MR. LeFANDE: Objection as to the  
4 form.

5 CHAIRPERSON MILLER: Overruled. Go  
6 ahead.

7 A No. We've had discussion in  
8 reference to a detail that -- there was a time  
9 we had six officers.

10 Q All right, so, this discussion  
11 wasn't in a conference room. It was in the  
12 hearing room like we're doing today, correct?

13 A I don't recall if it was in a  
14 hearing room or a meeting with an individual  
15 from that room.

16 Q I mean I -- I understand your  
17 position. I see you want the suspension to  
18 end, but it is very important to make sure we  
19 -- we have an understanding here. So -- so,  
20 again, you said you don't really remember  
21 where any of this all happened?

22 A Right. Whether it took place here

1 or whether it took place in your office or the  
2 other gentleman's office.

3 Q Now, somehow you recollect the  
4 actions that occurred in 2011 pursuant to  
5 civil law suit. You do recollect those  
6 actions, don't you?

7 A Related to?

8 Q In your direct examination, you  
9 just told the Board that you recollect seeing  
10 actions regarding an MPD officer and a patron.  
11 So, you do recollect actions as of 2011,  
12 correct?

13 A That's because I was involved  
14 directly.

15 Q And you were the owner directly in  
16 2010-2011, correct?

17 A Again, I said there was another  
18 partner at The Scene that may have taken the  
19 lead on this.

20 Q All right, okay. So, now, I think  
21 you make a good point. So, in terms of  
22 recollection, what's better? Things that are

1 in writing or things that are oral?

2 MR. LeFANDE: Objection as to the  
3 form of the question. Objection as to the  
4 relevance of the question. Obviously as to  
5 the attorney general badgering the witness.

6 CHAIRPERSON MILLER: Are you asking  
7 him whether his memory works better from oral  
8 events, something orally or in writing?

9 MR. ADAMS: Counsel has moved to a  
10 different subject, but --

11 CHAIRPERSON MILLER: Okay.

12 MR. ADAMS: What I was talking  
13 about in general is what's better; things that  
14 are oral or in writing in general? Because  
15 there is an issue regarding the matters that  
16 are before the Board.

17 CHAIRPERSON MILLER: I'm sorry, is  
18 your question still on the table?

19 MR. ADAMS: What?

20 CHAIRPERSON MILLER: Is your  
21 question still on the table?

22 MR. ADAMS: My question is still on

1 the table. In general, what is better in  
2 terms of recollection and memory? Things that  
3 are --

4 CHAIRPERSON MILLER: I have the --  
5 better? I mean is he an expert in memory?  
6 What is better?

7 MR. ADAMS: In general. In  
8 general. I mean I think it -- I think it goes  
9 to a point that the District will make. It's  
10 a very general question. It's neither  
11 leading.

12 MR. LeFANDE: This is so --

13 CHAIRPERSON MILLER: You have an  
14 objection to that?

15 MR. LeFANDE: This is so  
16 inappropriate.

17 CHAIRPERSON MILLER: Okay, I --

18 MR. LeFANDE: This witness has  
19 testified that he does not have a recollection  
20 of these proceedings. The proceedings that  
21 the government has produced has a different  
22 person participating in this process from --

1 Mr. Smothers. Mr. Smothers is the only person  
2 who participated in this entire transcript  
3 that he is describing.

4 Mr. Blakeney has repeatedly stated  
5 another partner was involved in this process,  
6 and he has no independent recollection --

7 CHAIRPERSON MILLER: Okay, let's  
8 move on and stick to his personal knowledge or  
9 memory.

10 MR. ADAMS: Okay.

11 CHAIRPERSON MILLER: Okay?

12 CROSS EXAMINATION (Resumed)

13 BY MR. ADAMS:

14 Q All right, so, Mr. Blakeney, you do  
15 remember that your establishment did sign onto  
16 an agreement in 2012 with MPD regarding the  
17 procurement of reimbursable details, correct?

18 A Not to my knowledge.

19 Q Okay, I'm going to provide to you  
20 --

21 CHAIRPERSON MILLER: What was the  
22 answer?

1 MR. ADAMS: Not to his knowledge.

2 CHAIRPERSON MILLER: Not to your  
3 knowledge? Okay.

4 MR. ADAMS: I am going to provide  
5 to the witness -- do I have an extra copy?  
6 It's already been entered into evidence as the  
7 District's Exhibit Number 3.

8 MR. LeFANDE: We have it. I don't  
9 need an extra copy.

10 MR. ADAMS: Well, just for time  
11 purposes, let me provide a copy. All right,  
12 so this is District Exhibit 3. Now, this is  
13 -- now, it reads on the second page, "This is  
14 an ABC establishment reimbursable program  
15 agreement." Is that correct? So, you do  
16 recognize that being the document, correct?

17 A I can tell you now that this is  
18 something that was signed by my son.

19 Q Okay.

20 A He's a manager at the club. The  
21 first time I saw this was during the early  
22 testimony with Sergeant Rogers.

1           Q       All right, so -- so, essentially  
2       what you're saying is the first time you saw  
3       it was -- so, as far as you're concerned, you  
4       have no basis upon which you came to be a  
5       member of this program that -- essentially,  
6       you have no basis to understand -- so, you're  
7       saying until -- until Friday, you have no  
8       basis or knowledge of -- of -- of the basis  
9       for why you were a member of this program,  
10      correct?

11                   MR. LeFANDE:  Objection as to the  
12      form.  I have -- I cannot follow what Attorney  
13      General is trying to say here.

14           Q       Do you understand my question, Mr.  
15      Blakeney?

16           A       No, sir, I don't.

17                   CHAIRPERSON MILLER:  Okay, are you  
18      going to rephrase the question?

19           Q       In terms of how you came to  
20      participate in the reimbursable program -- the  
21      reimbursable program, your testimony is that  
22      you have no knowledge of the basis of how that

1       came to be, correct?

2                   MR. LeFANDE:   Same objection.  I  
3       cannot decipher what he's trying to say.

4                   CHAIRPERSON MILLER:  Okay, overrule  
5       that.  I got it.  Did you get it, Mr.  
6       Blakeney?

7                   THE WITNESS:  Yes.

8                   CHAIRPERSON MILLER:  Okay.

9           A        This was based on a meeting with  
10       the ANC commissioner and the community, and a  
11       discussion that I had with the ANC at that  
12       time, who had told me about the reimbursable  
13       detail, and --

14          Q        So, what you're saying is that your  
15       son signed this, so therefore -- you're saying  
16       that your son signed this, correct?

17          A        Yes.  This --

18          Q        I apologize.

19          A        This is my son's signature.

20          Q        All right.  And so, what does that  
21       mean in terms of the effect of this agreement?

22          A        This -- this may have been filed in

1 the file for the reimbursable detail where I  
2 keep receipts for police that show up. But I  
3 had never seen this until like I say, early  
4 testimony with Sergeant Rogers.

5 Q Are you also saying that you've  
6 never had any discussion with -- with MPD  
7 regarding an agreement prior to -- prior to  
8 Friday? Is that your testimony?

9 A Can you repeat that?

10 Q My question is prior to -- are you  
11 saying, according to your testimony, that  
12 prior to Friday, you've had no discussions  
13 with MPD regarding reimbursable program  
14 agreement?

15 A No, sir.

16 Q Okay, so you have had discussions?

17 A No, I have not.

18 Q You never had any discussions  
19 regarding agreement --

20 A With MPD?

21 Q Yes.

22 MR. LeFANDE: Let me finish my

1 objection. Attorney General is continuing to  
2 badger the witness. Question has been asked  
3 and answered. He needs to move on.

4 CHAIRPERSON MILLER: Overruled. I  
5 don't think he's badgering.

6 Q So, question again is you've never  
7 had any discussions regarding agreement with  
8 MPD? Regarding an agreement or its terms?

9 MR. LeFANDE: Objection as to the  
10 form.

11 CHAIRPERSON MILLER: Overruled. Go  
12 ahead.

13 A No, sir, not as part of -- not part  
14 of being member of the detail.

15 Q Okay, so, therefore you're saying  
16 that in terms of -- now, within your testimony  
17 you knew to contact Sergeant Rogers regarding  
18 your billing dispute; is that correct?

19 A Yes, sir.

20 Q And you knew which office to  
21 contact regarding any problems regarding  
22 officers who are members of the reimbursable

1 detail or an issues regarding reimbursable  
2 detail, is that correct?

3 A No, sir. Because there was a time  
4 SOD handled the payment for the reimbursable  
5 detail, and once they relocated from L Street,  
6 I didn't know who took the payments at that  
7 time.

8 Q So, you never even had  
9 conversations with your son or Mr. Blakeney  
10 III --

11 A My son is Mr. Blakeney III.

12 Q Okay, so, did you have  
13 conversations with your son, Mr. Blakeney III,  
14 after February 2012 regarding the reimbursable  
15 detail program and its terms?

16 A No, sir.

17 Q No conversations?

18 A No, sir.

19 Q Okay. Now, earlier in your  
20 testimony, you did state that in terms of your  
21 role, you are the manager of issues including  
22 accounting and security, correct?

1           A       Yes.

2           Q       All right. Let me get back to the  
3 point. Now, in terms of the operation of your  
4 establishment, for instance, you do have  
5 contracts with the acts that perform at the  
6 establishment, correct?

7                   MR. LeFANDE: Objection as to form.

8                   CHAIRPERSON MILLER: Could you  
9 repeat the question?

10                   BY MR. ADAMS:

11           Q       Do you have contracts with acts,  
12 those who perform at your establishment?

13           A       No, sir.

14                   MR. LeFANDE: Objection as to the  
15 relevance.

16                   MR. ADAMS: The relevance of the  
17 question is to determine whether or not this  
18 - I mean, it goes to whether this  
19 establishment has knowledge of, I guess  
20 governing terms in terms of - I mean, in  
21 terms of his knowledge and experience in terms  
22 of entering into written documents regarding

1 governing terms of his operations. That's what  
2 the question is.

3 MR. LeFANDE: I have no clue what  
4 the Attorney General just said.

5 CHAIRPERSON MILLER: No, that's not  
6 relevant.

7 MR. ADAMS: Okay, move on.

8 CHAIRPERSON MILLER: Okay.

9 BY MR. ADAMS:

10 Q Did the establishment enter into  
11 any written contracts?

12 A Excuse me?

13 MR. LeFANDE: Objection as to  
14 relevance.

15 CHAIRPERSON MILLER: What's the  
16 question?

17 MR. ADAMS: Does the establishment  
18 enter into any written contracts?

19 CHAIRPERSON MILLER: Oh, okay.  
20 Overruled. You can answer the question.

21 THE WITNESS: Yes.

22 BY MR. ADAMS:

1           Q       All right. So, I want to go a bit  
2           - now, we spent a lot of time talking about  
3           the invoices and the credits and things of  
4           that nature. So, to the extent that there was  
5           governing terms with MPD, you're aware that  
6           payments for details are to be made in  
7           advance. Correct? Of any month, that you're to  
8           make your payments in advance of the month.  
9           Isn't that correct?

10          A       That's what MPD preferred but, as  
11          Mr. Rogers stated, it doesn't always happen  
12          that way.

13          Q       Okay. It doesn't happen that way  
14          but what you're - but you just stated that  
15          you know that that's how - what MPD prefers.  
16          Correct?

17          A       That's what they prefer, but if I  
18          call him on a Wednesday and say is it possible  
19          you could staff a detail for me on Saturday  
20          for an event, then he would try and make  
21          contact with the sergeant who does the detail  
22          at 5D and see if they could make it possible.

1 Q Okay.

2 A And I don't move forward with an  
3 event unless that can happen.

4 Q So, if requests are done in advance  
5 and payments are done in advance, we wouldn't  
6 have to go through this whole thing about  
7 whether you had invoices on a certain date or  
8 anything like that. That would already be  
9 disposed of because you would already know  
10 what you've already paid for. Correct?

11 A Now, we're talking about a 30-day  
12 request as opposed to a five-day sudden event  
13 that comes up. Maybe a venue got shut down or  
14 some other venue went through some closure and  
15 they want to a find venue to - instead of  
16 cancelling.

17 Q But you can make that in advance of  
18 five days. Correct? You can make your payment  
19 in advance with that five-day period. Right?

20 A Not always, not always possible.

21 Q Okay. So, I just want to make sure  
22 that I understand this. We got, I want to say,

1       like 28, 30 exhibits and a lot of it's emails  
2       of this, and payments of that. Now, I want to  
3       make sure I understand this correctly. And  
4       I'll be honest with you, I don't think there's  
5       any purpose in going through all of this,  
6       because this is just a complete mess.

7                   MR. LeFANDE: Objection as to the  
8       Attorney General having this running  
9       commentary about the direct examination and  
10      essentially arguing with the witness as to its  
11      relevance.

12                   MR. ADAMS: There's no argument, but  
13      please, I think the Respondent has - counsel  
14      has made plenty of characterizations of prior  
15      -

16                   CHAIRPERSON MILLER: Okay, now let's  
17      just go forward and stick to the cross.

18                   BY MR. ADAMS:

19                   Q       All right. So, let me make sure I  
20      understand this correct, I'm understanding  
21      this correctly, because there's a lot of stuff  
22      here. So - oh, yes, all right. So, remember

1 showing you - do you have Exhibits N, O, and  
2 P in front of you, Mr. Blakeney?

3 A Yes, sir.

4 Q All right. So, N is invoice 2378  
5 and it states that you owe \$7,132. Correct?

6 A And 16 cents, yes.

7 Q Sixteen cents, all right. And then  
8 O was when after MPD went through mediation  
9 with you and that amount was \$6,463.52.  
10 Correct?

11 A Yes, sir.

12 Q All right. And that's for the same  
13 invoice. Now, there's a payment that you made  
14 in Exhibit P, and I want to make sure we have  
15 this right. Now, this is done on May 20th,  
16 2014. Correct?

17 A Yes.

18 Q All right. And this is after Chief  
19 Lanier shut -- or did the 96-hour close of the  
20 establishment. Correct?

21 MR. LeFANDE: Objection as to  
22 relevance.

1                   CHAIRPERSON MILLER: Overruled. Go  
2 ahead.

3                   THE WITNESS: Yes.

4                   BY MR. ADAMS:

5           Q       All right. So, this check actually  
6 states the invoice number is 2449. So, that's  
7 what's on this document. Correct?

8           A       Yes, that was a mistake at the  
9 bank.

10          Q       Okay.

11          A       Instead of them going back to redo  
12 another cashier's check.

13          Q       Okay.

14          A       I just referenced the amount with  
15 the invoice number.

16          Q       So, that - so those - okay, so  
17 it's a mistake that happened by a third party.  
18 Correct?

19          A       Yes.

20          Q       All right. So, that meant to apply  
21 to 2378. Correct?

22          A       Yes, sir.



1 Correct? All past due amounts to the  
2 Metropolitan Police Department. Correct?

3 A The revised.

4 Q Okay. So, but I do not see a  
5 payment here for the amount of \$7,689.36 as it  
6 relates to invoice 2449. So, what you're  
7 saying is that after May 13th, 2014 you've  
8 paid \$14,152.88. Correct?

9 A You say 14,000 and?

10 Q \$152.88.

11 A No. Where are you reading that,  
12 sir?

13 Q That is from your Exhibit R.

14 MR. LeFANDE: No, you're reading the  
15 account -

16 MR. ADAMS: That's the account  
17 balance.

18 MR. LeFANDE: No.

19 MR. ADAMS: No, I can ask this  
20 question.

21 BY MR. ADAMS:

22 Q Have you paid - since May 13th,

1 2014 have you paid \$14,152.88?

2 A Since when?

3 Q Since May 13th.

4 A No, sir, I haven't.

5 Q Okay. So, you paid the \$6,463.52,  
6 but you have not paid the remaining \$7,689.36.  
7 Correct?

8 A Yes, there's still some discrepancy  
9 on this particular invoice.

10 Q Okay, so it's not paid.

11 A Yes.

12 Q And I apologize, I couldn't hear  
13 you. Can you please repeat your answer for the  
14 record?

15 A There's still some discrepancy in  
16 reference to invoice 2449.

17 Q And I think my question was it was  
18 not paid. Correct?

19 A Correct.

20 Q All right. And what you're saying  
21 is that you're not aware of any requirement  
22 that credits are to be done within 24 hours of

1 the issue, of any issue that you may have in  
2 terms of staffing level. Correct?

3 MR. LeFANDE: Objection as to the  
4 form.

5 CHAIRPERSON MILLER: Rephrase the  
6 question.

7 BY MR. ADAMS:

8 Q What you are saying is that you are  
9 not aware of any requirement to address issues  
10 regarding staffing levels within 24 hours of  
11 any particular event.

12 MR. LeFANDE: Objection. I'm unaware  
13 of any testimony by this witness as to  
14 anything having to do with that.

15 MR. ADAMS: I'm asking the question.  
16 So, I mean, I think I'm entitled to ask the  
17 question regarding or not he's aware of any  
18 rules regarding when -

19 MR. LeFANDE: That makes a  
20 presumption of fact that there are such rules.  
21 If he has a question as to, if so -

22 MR. ADAMS: Wait, wait, whoa, whoa,

1       whoa, whoa. And that's where I'm having issues  
2       right here. You're trying - you know, in  
3       terms of trying to be able to influence what  
4       - the outcome in terms of answers. I'm asking  
5       whether -

6                               (Simultaneous speech.)

7               MR. ADAMS:     - there is awareness  
8       - wait a minute, wait a minute.

9               CHAIRPERSON MILLER: Only one person  
10      at a time.

11              MR. ADAMS: I want to know what his  
12      awareness of any requirement -

13              MR. LeFANDE: That was not your  
14      question.

15              CHAIRPERSON MILLER: Okay. You're  
16      rephrasing.

17              BY MR. ADAMS:

18              Q       Are you aware of any requirement to  
19      address discrepancies regarding the attendance  
20      of officers and/or credits within 24 hours of  
21      a given date or event?

22              A       No, sir. Again, that was my first

1 time learning of this a couple of days with  
2 the testimony of Sergeant Rogers. Normally, I  
3 would let Sergeant Ferretti know, who's in  
4 charge of the detail that, you know, we're  
5 short three men, two men, one man, and he  
6 would tell me that he will contact Sergeant  
7 Rogers. I did not know of the procedure.

8 Q Okay. So, you state - so, now  
9 you're saying you normally speak to Sergeant  
10 Ferretti. And do you document the times that  
11 you've spoken to Sergeant - how do you  
12 document the times that you've spoken to  
13 Sergeant Ferretti regarding the amount of  
14 officers who show up to your establishment?

15 A I did not document it, but I have  
16 continued to keep the journal of the officers  
17 that showed up, so I know on that particular  
18 date that we had - what numbers of officers  
19 that we did have.

20 Q Okay. So, I want to go back a  
21 little bit. I'm going to go back to towards  
22 the end of your testimony. Now, towards the

1 end of your testimony you stated that you  
2 produced evidence as part of a law suit.

3 Correct?

4 A That I produced evidence?

5 Q Yes.

6 A Yes, to the DBR.

7 Q I apologize. In your 2011 case you  
8 stated that you produced evidence in that  
9 case. Correct?

10 MR. LeFANDE: Objection as to the  
11 form. Can we have the Attorney General refer  
12 specifically to which case he would like the  
13 witness to refer to.

14 MR. ADAMS: I'm not sure.

15 MR. LeFANDE: And make complete  
16 sentences with proper interrogatories as to  
17 what he would like the testimony to be  
18 elicited from this particular witness.

19 MR. ADAMS: You know what, I want to  
20 address this right now, because I think this  
21 should be addressed in front of the Board  
22 right now.

1                   The District of Columbia, counsel  
2                   for the District of Columbia, is asking  
3                   questions. I think it's been understandable to  
4                   the Board at this point. I do take great  
5                   offense to anyone stating on a continual basis  
6                   in terms of form to state that somehow the  
7                   District of Columbia is not using  
8                   comprehensible language. I don't know if  
9                   that's to enforce the record to make it sound  
10                  as if I'm saying something different, but I  
11                  would like the record to note that the  
12                  District's language is understandable.

13                  CHAIRPERSON MILLER: Okay, I would  
14                  agree. And let's not do that any more. There's  
15                  not just one type of form in which to ask a  
16                  question.

17                  MR. LeFANDE: If we had a 30-word  
18                  disjointed sentence with stops and starts,  
19                  it's impossible to follow along with what it  
20                  is that the Government is asking.

21                  CHAIRPERSON MILLER: Okay. Mr.  
22                  LeFande, if you don't understand a specific

1 then you can ask that he rephrase it, but not  
2 go into a whole criticism of the manner in  
3 which he's asking questions.

4 MR. ADAMS: Noted but, however, I  
5 will not change how I ask my questions. Thank  
6 you, Mr. LeFande.

7 BY MR. ADAMS:

8 Q Now, let's refer to Exhibit FF.  
9 Now, this is part of your case. This is  
10 Exhibit FF.

11 A Okay.

12 Q Now, you saw this. Right? So, this  
13 is the case I'm talking about. This is case -  
14 - so, let me make sure you understand. The  
15 civil action number 2011-8475. Now, you're  
16 with me on what we're talking about. Correct?  
17 Good, we're doing good.

18 Now, you stated within your direct  
19 examination that you produced evidence as a  
20 part of that case. Correct?

21 A Which led to this case.

22 Q All right. So, at some point you

1 did produce evidence. Correct?

2 A Yes.

3 Q Okay. Now, you produced evidence  
4 pursuant to the civil discovery process.  
5 Correct?

6 A Yes.

7 Q So, you were required to provide  
8 that information. Correct?

9 A Not required, but it was part of  
10 the investigation. There was an actual ABRA  
11 investigator there on the scene when this took  
12 place and he requested a copy of the video  
13 footage.

14 Q Okay.

15 A Which eventually led to this civil  
16 matter.

17 Q So, there was - but at some point  
18 someone asked you to provide that information.  
19 Correct? And you're required to do so.  
20 Correct?

21 A Yes.

22 Q Okay. So, what is the date of -

1       now, you stated that there was - you had an  
2       investigation, an inquiry by Internal Affairs.  
3       Correct?

4             A       Yes.

5             Q       All right. And that's from  
6       Metropolitan Police Department. Correct?

7             A       Yes.

8             Q       All right. What was the date of  
9       that interview with the Metropolitan Police  
10      Department, do you remember?

11            A       This was approximately six months  
12      ago.

13            Q       Okay. So, this was approximately  
14      six months ago, so that was October 2013? Does  
15      that sound about right?

16            A       I would have to refer to my notes  
17      during the depositions that actually took  
18      place during that time.

19            Q       All right. I just want to make sure  
20      I understand that we're saying - we are all  
21      on the same page. Prior to you being contacted  
22      by the Metropolitan Police Department in

1 January of 2014, there was an outstanding  
2 balance for the MPD overtime detail from the  
3 period of October 2013 and January 2014.

4 Correct?

5 A The outstanding balance you say of  
6 14,000 what?

7 Q No, I apologize. Let me make sure  
8 we're on the same page. All right. So, there  
9 was a period - sorry, let me make sure I have  
10 this right.

11 MPD provides you notice that you  
12 had an outstanding amount of money in terms of  
13 what was owed for the procurement of your  
14 overtime detail. Correct?

15 A Yes, sir.

16 Q Okay. So, that was in January. At  
17 that time, there were no payments for your  
18 establishment from October 2013 through  
19 January 2014. Correct?

20 A Based on his email, yes.

21 Q All right. Now, even incorporating  
22 the credits, your testimony today is that not

1 that there was not any amount that you owed,  
2 it was just regarding the exact amount that  
3 you owed. Isn't that correct?

4 A Can you repeat that?

5 Q The issue was not - the issue that  
6 was made - sorry. The issue here was not  
7 whether or not you owed nothing in terms of  
8 payment for the MPD detail. Isn't that  
9 correct?

10 MR. LeFANDE: Objection as to the  
11 form.

12 MR. ADAMS: Okay.

13 BY MR. ADAMS:

14 Q You did owe - as of January 29th,  
15 you were aware that you did owe something in  
16 terms of payment to MPD. Correct?

17 A Yes.

18 Q All right. Now, I want to ask you  
19 a couple of questions about the incident  
20 itself. I'm just filing through the notes  
21 here, so I want to make sure I had - I'm in  
22 the right place.

1                   Now, in terms of the incident that  
2 occurred - well, actually, you did - before  
3 - prior to this hearing you did submit a  
4 statement to ABRA. Isn't that correct? A  
5 written statement to ABRA regarding the events  
6 that occurred on May 17, 2014. Correct?

7                   MR. LeFANDE: Objection as to the  
8 form.

9                   CHAIRPERSON MILLER: Overruled. Do  
10 you understand the question?

11                   THE WITNESS: I think if he's  
12 speaking of the incident report that was  
13 submitted, yes.

14                   BY MR. ADAMS:

15                   Q       Okay. So, you submitted an incident  
16 report regarding the incidents - the events  
17 of May 17th, 2014. Correct?

18                   A       Yes, sir.

19                   Q       And you submitted that to ABRA.

20                   A       Yes, sir.

21                   Q       Okay. And according to that  
22 statement you stated at that time that you

1 noticed or it was noticed that security  
2 witnessed a group of males along with females  
3 aggressively pushing and shoving each other.

4 Correct?

5 A Yes, sir.

6 Q All right. So, due to this your  
7 security intervened. Correct?

8 A Yes, sir.

9 Q All right. And so what you're  
10 saying according to this is that several  
11 members of this group that was pushing and  
12 shoving were walked out by your security, by  
13 the members of your security at the same time.  
14 Correct?

15 A Yes, to later learn that this was  
16 one and the same group.

17 Q All right. But there's pushing and  
18 shoving within this group.

19 A Yes, they were trying to detain  
20 family members who were upset about the driver  
21 actually being there at the venue.

22 Q All right. It says pushing and

1 shoving within the same group because of what  
2 you're saying is -

3 A I think there was a young lady or  
4 someone within the group was very upset that  
5 the guy who was actually driving the vehicle  
6 that caused the accident was there at the  
7 memorial. And she wanted to approach him, and  
8 the rest of them did not want her to approach  
9 him.

10 Q All right. So, nobody - what  
11 you're saying is no one was let out  
12 individually. Correct?

13 MR. LeFANDE: Objection as to the  
14 form.

15 BY MR. ADAMS:

16 Q You are saying that no one was let  
17 out individually. Is that -

18 CHAIRPERSON MILLER: Overruled.

19 MR. LeFANDE: As to what time, as to  
20 what is -

21 MR. ADAMS: Okay. Let me restate.

22 BY MR. ADAMS:

1 Q As of 2:47 your testimony is that  
2 no single individual was let out of the  
3 establishment. Correct?

4 A No, the - they were taken out - a  
5 couple of individuals - the aggressive - the  
6 ones that appeared to be aggressive was taken  
7 out of the club, and the others just followed.

8 Q All right.

9 A And that's when it was learned that  
10 they were one and the same group.

11 Q So, within your statement you state  
12 that they were met by a small group of males.  
13 Correct?

14 A This is once they exit -

15 Q Let me step back.

16 A Yes.

17 Q You're stating that the large group  
18 of people who are involved in the 2:47  
19 incident and who were led out of the  
20 establishment to the gate, that they were met  
21 by a group - a small group of males. Correct?

22 A Yes, when they - upon exiting the

1 gate.

2 Q All right. How many males were  
3 there?

4 A Approximately three.

5 MR. ADAMS: All right. The Board's  
6 indulgence, I apologize.

7 BY MR. ADAMS:

8 Q Okay. So, now according to your  
9 statement you stated that this group starts  
10 walking together. Correct?

11 A Yes, sir.

12 Q All right. And your testimony is  
13 that there was no fighting within this group  
14 at the time they're outside the gate. Correct?

15 A At the time they were outside the  
16 gate?

17 Q Yes.

18 A Based on the video surveillance  
19 which was midway up the street there was an  
20 altercation.

21 Q What did you mean by midway up the  
22 street?

1           A        Again, I was up actually in the  
2           driveway so I couldn't see when they actually  
3           headed towards Queen's Chapel Road. I later  
4           learned that after watching the surveillance  
5           footage from the neighboring business.

6           Q        Now, wasn't that footage from the  
7           neighboring business, wasn't that for a camera  
8           angle that was directly in front of the  
9           neighboring business?

10          A        No, that's actually on the side of  
11          their business.

12          Q        All right. And the side of their  
13          business is -

14          A        Faces Adam's Place.

15          Q        Faces Adam's Place, but it is what,  
16          within 10 feet of your gate entrance. Correct?

17          A        The camera itself?

18          Q        In terms of the business.

19          A        I don't understand.

20          Q        How close is the business to your  
21          business?

22          A        Approximately 120 feet.

1 Q 120 feet?

2 A Yes.

3 Q All right . And is that - okay, so  
4 that - this business faces Adam's Place.  
5 Correct?

6 A Yes.

7 Q Is on Adam's Place. And your  
8 business is back and towards the alleyway.  
9 Correct?

10 A Yes, sir.

11 Q Okay. So, when you're talking about  
12 120 feet, are you - you're referring in terms  
13 of your - in terms of distance you're  
14 referring to the fact that the business is  
15 right on Adam's Place and you're further up.  
16 Correct?

17 A Yes, sir.

18 Q Okay. So, in terms of distance  
19 from the front gate, how far is that business  
20 from the front gate?

21 A From the front gate it's right  
22 there at the tip of the front. It actually

1 touches their main entrance.

2 MR. ADAMS: Okay, thank you. I have  
3 no further questions.

4 CHAIRPERSON MILLER: Okay. Board  
5 questions? I have some.

6 THE WITNESS: Okay.

7 CHAIRPERSON MILLER: I just want to  
8 follow up on how you came to hire the  
9 reimbursable detail. Do you remember?

10 THE WITNESS: Again, actually  
11 talking to - attending the ANC meetings in  
12 the community, I actually learned through a  
13 ANC person about the police detail.

14 CHAIRPERSON MILLER: And when was  
15 that?

16 THE WITNESS: Excuse me?

17 CHAIRPERSON MILLER: When was that,  
18 what year was that?

19 THE WITNESS: That was in 2008.

20 CHAIRPERSON MILLER: So, when did  
21 you start having reimbursable detail?

22 THE WITNESS: I would say I found

1 out - no, not when we initially opened, but  
2 I think she might - she actually spoke of any  
3 go-go events, that it would be good to have  
4 the police there. And that's how I learned of  
5 the detail. That if I was to, you know, have  
6 any go-go dancer that I could detain a police  
7 detail to SOV. I'm not sure if she knew all  
8 the particulars at that time.

9 CHAIRPERSON MILLER: So, whenever  
10 you started to have them, have you found them  
11 to be valuable to security of the patrons and  
12 others around your establishment?

13 THE WITNESS: Yes, very, because  
14 again, when I initially opened there were no  
15 other venues open over there, and we spoke of  
16 the thousand foot radius, and you have  
17 residential area on one side of the bridge,  
18 and then you have other commercial businesses.  
19 So, I just wanted to actually set up a  
20 perimeter where the patrons felt safe because  
21 we were bringing in national artists, as well.

22 CHAIRPERSON MILLER: So, what was

1 your experience with the reimbursable detail,  
2 was it positive?

3 THE WITNESS: It has been positive,  
4 and negative.

5 CHAIRPERSON MILLER: How so?

6 THE WITNESS: Well, I have been -  
7 the positive side is the presence. When  
8 they're posted in position like they're  
9 supposed to be, then it's great, you know, to  
10 see them at lengths, and every time you turn  
11 the corner you see a police cruiser. And,  
12 initially when we first started, a six-man  
13 police detail we actually had five or six  
14 cars. But now you have eight-man police  
15 details and they come four to a car, so we  
16 only have two cars, and the visibility is not  
17 as good because they sit at the gate and they  
18 sit at the end of the street. And I would love  
19 to see them, you know, provide more vehicles.  
20 I even thought myself to buy a old police  
21 cruiser and allow them to use that when  
22 they're actually detailed there at the scene

1 because I just think the visibility played a  
2 big part in deterring crime in the area.

3 CHAIRPERSON MILLER: So, your son  
4 signed the contract for the reimbursable  
5 detail.

6 THE WITNESS: Yes, ma'am.

7 CHAIRPERSON MILLER: Did you know  
8 there was a contract with them?

9 THE WITNESS: No, ma'am, I did not.  
10 And I actually - when I left here the other  
11 day, I actually had a conversation with him in  
12 reference to this, and I told him from now on,  
13 anything that comes through here that's going  
14 to require a signature, make sure that I sign  
15 it, and no one else.

16 CHAIRPERSON MILLER: Did anyone ever  
17 tell you that if you didn't pay for the  
18 reimbursable detail that you wouldn't get  
19 them?

20 THE WITNESS: No, ma'am. I didn't  
21 learn about it until I got the email from  
22 Sergeant Rogers.

1 CHAIRPERSON MILLER: When was that?

2 THE WITNESS: That was sometime in  
3 February, I think.

4 CHAIRPERSON MILLER: So, you went  
5 several months without a reimbursable detail.

6 THE WITNESS: Yes, once they ceased  
7 the services.

8 CHAIRPERSON MILLER: So, did you  
9 ever ask how you could get the reimbursable  
10 detail again?

11 THE WITNESS: He made it clear in  
12 his email that until the - they were paid in  
13 full that they would not send a detail.

14 CHAIRPERSON MILLER: Okay. You  
15 mentioned in response to some cross-  
16 examination about some aggressive patrons that  
17 were taken out at 2:47?

18 THE WITNESS: No, not at 2:47. This  
19 was at approximately 1:45.

20 CHAIRPERSON MILLER: So, were you  
21 referring to the ones that we already heard  
22 about with the brother of the sister?

1 THE WITNESS: Yes. Yes, ma'am.

2 CHAIRPERSON MILLER: Okay. So, there  
3 weren't any other -

4 THE WITNESS: No, ma'am.

5 CHAIRPERSON MILLER: Okay. Did you  
6 notice any other groups that were arguing  
7 outside?

8 THE WITNESS: No, ma'am, I didn't.

9 CHAIRPERSON MILLER: Okay. Do you  
10 know anything about the shooting that  
11 occurred?

12 THE WITNESS: Nothing other than  
13 what I witnessed on the surveillance that I  
14 obtained from the neighboring business.

15 CHAIRPERSON MILLER: Can you take a  
16 minute and just say what do you remember that?

17 THE WITNESS: I remember seeing a  
18 group exiting through the fence and they were  
19 actually met by approximately three, four  
20 guys, and they kind of merged into the group  
21 as they walked up towards Queen's Chapel Road,  
22 which is - I would say three-quarters of a

1 block away. And there was - based on the  
2 surveillance there was a small altercation  
3 that was actually broke up by the people  
4 within the group. And they started to walk up  
5 Queen's Chapel Road again, and when they got  
6 maybe three-quarters of the way over the train  
7 tracks you could see people were actually  
8 scattering on the tape and, you know, ducking,  
9 so I just assumed that this is when the  
10 shooter opened fire on the crowd.

11 CHAIRPERSON MILLER: Okay, so this  
12 is an assumption. I recognize that, but where  
13 - do you have an idea as to where the shooter  
14 opened up fire on the crowd?

15 THE WITNESS: No, ma'am. Based on  
16 the testimony of the - well, the statement  
17 that the young man that I was treating said he  
18 was up the street and someone stepped from  
19 behind the car and just started firing. That's  
20 the only thing I know.

21 CHAIRPERSON MILLER: Okay. So,  
22 what's up the street, what street, Adam's?

1 THE WITNESS: Up Adam's Place which  
2 is closer to Queen's Chapel Road.

3 CHAIRPERSON MILLER: Okay. So, when  
4 you talked about the reimbursable detail, I  
5 think you said that they would be stationed at  
6 the gate at the end of the street.

7 THE WITNESS: Yes, I -

8 CHAIRPERSON MILLER: Is that about  
9 the same place, or are we talking about -

10 THE WITNESS: Oh, no, stationed up  
11 the street would be actually at the corner, so  
12 I think the incident took place approximately  
13 three-quarters of the block just before  
14 Queen's Chapel Road.

15 CHAIRPERSON MILLER: And then where  
16 is that in relation to the establishment?

17 THE WITNESS: I would say  
18 approximately 300 feet.

19 CHAIRPERSON MILLER: So, what's the  
20 gate at the end of the street you were talking  
21 about?

22 THE WITNESS: That's at the end of

1 the driveway.

2 CHAIRPERSON MILLER: Driveway.

3 THE WITNESS: Yes, there's a 100 --  
4 the gate is actually - acts as security for  
5 my business and the neighboring businesses.  
6 It's approximately 160 feet from my venue, so  
7 this is the gate that they have to enter into  
8 off of the street.

9 CHAIRPERSON MILLER: Right. Okay.

10 THE WITNESS: To get to the venue.

11 MR. LeFANDE: If I may, Madam Chair,  
12 I think you might have misunderstood the  
13 prior testimony. I think he said that the  
14 officers were positioned at the gate and at  
15 the end of the street. I don't think he said  
16 that they were positioned -

17 CHAIRPERSON MILLER: Oh.

18 MR. LeFANDE: - at the gate at the  
19 end of the street.

20 CHAIRPERSON MILLER: Thank you.

21 MR. LeFANDE: I think that might be  
22 what the confusion is here.

1                   CHAIRPERSON MILLER: Is that  
2 correct?

3                   THE WITNESS: Yes.

4                   CHAIRPERSON MILLER: Okay. So, when  
5 you mean at the end of the street, let's go  
6 there. You mean at the end of Adam's Place?

7                   THE WITNESS: Yes, that would be at  
8 the intersection of Queen's Chapel Road and  
9 Adam's Place.

10                  CHAIRPERSON MILLER: Okay. So,  
11 that's where the detail would be, part of the  
12 detail.

13                  THE WITNESS: Part of the detail,  
14 yes.

15                  CHAIRPERSON MILLER: So, then my  
16 question is then where did - not that you -  
17 you don't have personal knowledge, but the  
18 person you were treating said where did he  
19 think the shooting occurred?

20                  THE WITNESS: Just before he got to  
21 Queen's Chapel Road.

22                  CHAIRPERSON MILLER: Just before

1 Queen's from Adam's Place?

2 THE WITNESS: Yes, he was actually  
3 on Adam's Place and just before he got to  
4 Queen's Chapel Road.

5 CHAIRPERSON MILLER: Okay. Let me  
6 check. Okay. I thought that you said in  
7 response to one of Mr. Adams' questions about  
8 investigations that you met with MPD Internal  
9 Affairs in October 2013. Was that correct?

10 THE WITNESS: As part of the  
11 depositions for the civil suit.

12 CHAIRPERSON MILLER: Is that the  
13 only - is that what you were referring to?

14 THE WITNESS: Yes.

15 CHAIRPERSON MILLER: Okay. So, it  
16 wasn't -

17 THE WITNESS: When you're speaking  
18 of Internal Affairs.

19 CHAIRPERSON MILLER: Okay.

20 THE WITNESS: Yes.

21 CHAIRPERSON MILLER: Because I'm  
22 pretty sure that the document I had with

1 respect to the court case was earlier, like in  
2 2011 or something like that.

3 THE WITNESS: Which document?

4 CHAIRPERSON MILLER: Let me see if  
5 we can -

6 MR. LeFANDE: This is Exhibit FF.

7 CHAIRPERSON MILLER: Exhibit F?

8 MR. LeFANDE: FF.

9 CHAIRPERSON MILLER: FF. Okay.  
10 Right. It says - Exhibit FF is the complaint,  
11 and okay. So, maybe the complaint was filed in  
12 2011, but the discovery was afterwards?

13 THE WITNESS: Yes, this actually -

14 MR. LeFANDE: If I can just  
15 interject just a little bit of procedural  
16 history about that particular case, it might  
17 make it a little clearer for the Board. The  
18 case was filed in the Superior Court October  
19 27th, 2011. Upon receipt of the complaint by  
20 the District of Columbia, it was removed for  
21 diversity jurisdiction to the District Court,  
22 United States District Court for the District

1 of Columbia, which essentially means that the  
2 case starts all over in a different court  
3 because they're availing themselves of limited  
4 jurisdiction of the federal courts.

5 If I can draw the Chairwoman's  
6 attention to the very top of the page, you'll  
7 see an ECF printout number which is not part  
8 of the original document. This is generated by  
9 the U.S. District Court's website when these  
10 kinds of papers are filed there. And that  
11 shows up to December is when that case was  
12 filed for the diversity jurisdiction in the  
13 different court.

14 In the course of that then, yes, it  
15 would be very ordinary for the discovery in  
16 these cases to take over a period of years, so  
17 that the written discovery, there would be  
18 subpoenas. And then after all of that would be  
19 likely that they would have a deposition, ore  
20 tenus, of a particular witness after all that  
21 had occurred.

22 CHAIRPERSON MILLER: Okay. I just

1 wanted to make sure that that was the right  
2 ballpark time that you were providing  
3 evidence, or what we were talking -

4 THE WITNESS: Yes, this case is  
5 actually ongoing.

6 CHAIRPERSON MILLER: Okay. And it's  
7 still - okay. Finally, this will be the last  
8 question. The emails, okay, so there are a lot  
9 of emails that were submitted. And I'm just  
10 curious where they're pulled from. They're not  
11 pulled - I mean, they have different titles  
12 on them, look like Exhibit M says James Rogers  
13 is at the top, James Rogers found, or Exhibit  
14 L might say Outstanding Invoices-Yahoo Mail,  
15 so I'm just - did you pull these, or did your  
16 attorneys pull these?

17 MR. LeFANDE: Not to invade the  
18 attorney work product, so if you want to ask  
19 - you're now invading -

20 CHAIRPERSON MILLER: Did you pull  
21 these yourself?

22 THE WITNESS: Yes, ma'am.

1 CHAIRPERSON MILLER: Can you just  
2 tell me, do you know how these emails were -

3 THE WITNESS: Yes, I actually did a  
4 printout of these emails.

5 CHAIRPERSON MILLER: You did.

6 THE WITNESS: Yes, ma'am.

7 CHAIRPERSON MILLER: Okay. So, can  
8 you just briefly say how you did it, how you  
9 pulled them?

10 THE WITNESS: How did I pull them?

11 CHAIRPERSON MILLER: Find them, yes.

12 THE WITNESS: I actually went into  
13 my Yahoo account.

14 CHAIRPERSON MILLER: Okay.

15 THE WITNESS: And every email I hit  
16 print, and it printed the trailer, and some of  
17 them were overlapped -

18 CHAIRPERSON MILLER: Okay.

19 THE WITNESS: - of the fuller  
20 trailer.

21 CHAIRPERSON MILLER: Okay, thank  
22 you.

1 THE WITNESS: You're welcome.

2 CHAIRPERSON MILLER: All right. Mr.  
3 Short?

4 MR. SHORT: I guess we're saying  
5 good afternoon, or evening.

6 THE WITNESS: Yes.

7 MR. SHORT: Good evening.

8 THE WITNESS: Good evening.

9 MR. SHORT: The case that we're  
10 talking about, 2011, you said that you  
11 recalled there were details that normally  
12 would be at the gate, and then back at the  
13 intersection.

14 THE WITNESS: Yes, sir.

15 MR. SHORT: The police officer threw  
16 somebody off of your steps. How did the police  
17 officer get to the steps when the detail isn't  
18 normally even there?

19 THE WITNESS: Actually, prior to the  
20 incident they would park a car right outside  
21 the door of the venue. They would have a  
22 cruiser, a marked cruiser right there at the

1 door of the venue, and it wasn't until after  
2 that incident they actually decided to  
3 reposition the detail.

4 MR. SHORT: Well, apparently) thrown  
5 down the steps. I mean, she couldn't have been  
6 calm, and cool, and collected. What was going  
7 on to cause she and the officer to have a -

8 THE WITNESS: This young lady was -

9 COURT REPORTER: Sir, you might have  
10 turned your microphone off.

11 THE WITNESS: This young lady was  
12 actually intervening a eviction of a patron  
13 who was being unruly, and she started to punch  
14 security in the back who was escorting her  
15 girlfriend out the door. During that time,  
16 there was a police standing in the doorway who  
17 actually grabbed her from behind as she was  
18 punching security in the back and demanding  
19 them to let her girlfriend go. This officer  
20 grabbed her from behind. She started to kind  
21 of horse kick from behind not knowing that it  
22 was a police officer, and he in turn actually

1       forcefully pushed her out the door, and she  
2       actually fell down the steps and broke her leg  
3       in two places.

4                   MR. SHORT: Okay. Also, you've had  
5       this club for several years so you pretty much  
6       know the atmosphere of your crowds and  
7       whatever. Correct?

8                   THE WITNESS: Yes, sir, it varies.

9                   MR. SHORT: Okay. Now, you said  
10      there was a disturbance where they had to get  
11      a whole group of young men out, and they  
12      walked up the street and met another group.

13                  THE WITNESS: Well, this group of  
14      young men that they got out, we later learned  
15      that this was one and the same group. These  
16      were family members, there were some females,  
17      there were some young ladies that were in the  
18      group, as well. And it was more so the young  
19      ladies who were upset that the gentleman who  
20      was actually driving the car, that actually  
21      caused the incident was there at the venue.

22                  MR. SHORT: Okay. Well, that wasn't

1       enough for you to maybe notify the police that  
2       you have a group of people and they were not  
3       acting like gentlemen and ladies?

4                   THE WITNESS: No, sir. During that  
5       time they were actually outside the venue.  
6       There was no threat to any other patrons at  
7       that time. And, again, this is at closing  
8       where the lights were on and people were  
9       actually leaving. It was very close to 3 a.m.  
10      which, you know, the lights came on  
11      approximately 2:30. And I turned the lights on  
12      pretty early because we met our quota to  
13      actually - the request that the family was  
14      looking for in the dollar amount, so I said if  
15      we turn the lights on maybe everybody will  
16      start to trickle out, and this is for a  
17      staggered exit.

18                   MR. SHORT: Okay. I'm getting pretty  
19      close to my last questions, but your  
20      investigative history with ABRA is quite  
21      extensive. It could be considered to be not a  
22      good one. Do you have any comment as to why

1 there have been so many calls and so many  
2 cases?

3 THE WITNESS: There were several  
4 incidents that had taken place that I really  
5 think of the police was in position that these  
6 incidents would have never occurred. There was  
7 another incident that was labeled a stabbing  
8 that we later found that it was a hanger, a  
9 fire extinguisher hanger that the gentleman  
10 was pushed into, and that was labeled a  
11 stabbing with an unknown object. And after  
12 reviewing surveillance we learned that okay,  
13 the fire extinguisher was on the floor, and  
14 this guy got pushed into the holder of a fire  
15 extinguisher.

16 MR. SHORT: Okay. Well, you're an  
17 EMS person. Correct?

18 THE WITNESS: Yes, sir.

19 MR. SHORT: So, that holder could  
20 have easily punctured all the way to his lung,  
21 couldn't it? I mean, that was a very dangerous  
22 injury.

1                   THE WITNESS: Well, the holder  
2                   itself is approximately one inch, and -

3                   MR. SHORT: So, it was hanging on  
4                   the wall as required by the code?

5                   THE WITNESS: Yes, sir.

6                   MR. SHORT: Someone knocked it off  
7                   the wall?

8                   THE WITNESS: Yes, sir.

9                   MR. SHORT: Was there a fight going  
10                  on?

11                  THE WITNESS: There was an  
12                  altercation going on, and there was security  
13                  actually putting some gentlemen out, and this  
14                  particular individual was actually pushed into  
15                  the hanger.

16                  MR. SHORT: Okay. What was the ages  
17                  again of all the young people in this last  
18                  incident? What were the ages again?

19                  THE WITNESS: It was 18 to 40. And,  
20                  again, there was so many individuals that I  
21                  had never seen before. This wasn't a regular  
22                  crowd of our's. This was -

1                   MR. SHORT: I hope it wasn't the  
2 regular crowd.

3                   THE WITNESS: No, it wasn't. This  
4 was not a regular crowd of ours. This was  
5 people in support of - trying to help the  
6 family raise money to bury these two  
7 individuals.

8                   MR. SHORT: I work in Washington,  
9 too, as you know.

10                  THE WITNESS: Yes, sir.

11                  MR. SHORT: And when you have 18-  
12 year olds mixed with 40-year olds, and the  
13 lights are down, how can you tell who's  
14 drinking legally and who's not?

15                  THE WITNESS: We actually have these  
16 - we have blue lights, and normally the 21  
17 and over get bands, anyone under 21 do not get  
18 a band, so if we identify someone without a  
19 band that's drinking, then they're immediately  
20 escorted to the front door by security.

21                  MR. SHORT: So, that particular  
22 night nobody was escorted out for underage

1 drinking. Correct?

2 THE WITNESS: No, sir.

3 MR. SHORT: And, again, we know what  
4 18-year olds were doing. I've been 18, and  
5 you've been 18. But I'll just say pretty much  
6 is that the rule now, you want to continue  
7 those 18 mixing with the 40-year olds?

8 THE WITNESS: After this incident,  
9 believe me, I have thought very hard that I  
10 would prefer to do a 30 and over event. I am  
11 -

12 MR. SHORT: Why not?

13 MR. LeFANDE: It's illegal.

14 THE WITNESS: Because you can't  
15 characterize all 21 - and most definitely I  
16 am not thinking twice about doing an 18 - an  
17 under 21 event. I am just convinced -

18 MR. SHORT: Did you close your bar?

19 THE WITNESS: Excuse me?

20 MR. SHORT: You have to close your  
21 bar then. Correct?

22 THE WITNESS: No, I'm saying I'm not

1 thinking about doing a under 21 event. I  
2 prefer to do 21 and over. And really look  
3 towards doing more 30 and over events. And  
4 just recently we had a group that are called  
5 the Backyard Band which had been running there  
6 for the last three plus year, and I didn't  
7 agree to signing to a contract agreement with  
8 them because I was just - I'm just really  
9 sick of the whole go-go circuit. And it just  
10 allowed my Saturdays - I can do so much more  
11 on Saturdays. And this kind of tied my  
12 Saturdays down with having them in there under  
13 contract.

14 MR. SHORT: I'm very familiar with  
15 the Junkyard Band, and I'm quite -

16 THE WITNESS: This was Backyard.

17 MR. SHORT: Backyard, okay. Well,  
18 Junkyard, Backyard, but they're go-gos.

19 THE WITNESS: Yes, sir.

20 MR. SHORT: And they normally have  
21 crowds that are getting unruly, normally. They  
22 have a history of that.

1 THE WITNESS: Some of the bands are  
2 a little worse than others.

3 MR. SHORT: Okay.

4 THE WITNESS: But Backyard tended to  
5 have a 30 and over crowd, and that's where we  
6 initially started with the 30 and over, and we  
7 did free buffet. And it's just - they just  
8 didn't come out in numbers in support of that.  
9 And he said it was because they had people who  
10 were 21 and over that were now eager to come  
11 and see Backyard, and they had things that  
12 were 30 and over because they had been out  
13 there 20 to 30 years performing, and their  
14 older fans did not want to engage with the  
15 younger fans. So, we did the 30 and over, and  
16 it's a whole different atmosphere.

17 MR. SHORT: Okay. Thank you very  
18 much. Thank you, Madam Chair.

19 CHAIRPERSON MILLER: I have one  
20 other question. I think in response to  
21 questions by Mr. Adams you stated that you  
22 understood that there's still a question about

1 whether you owe money to MPD. Is that correct?

2 THE WITNESS: I know there was an  
3 invoice, 2449 -

4 CHAIRPERSON MILLER: Right.

5 THE WITNESS: - that we still had  
6 a discrepancy about.

7 CHAIRPERSON MILLER: Okay. So, in  
8 light of that - and I recognize all the  
9 payments you have made. I see that in all the  
10 invoices, but in light of the fact that  
11 there's still this discrepancy, you understand  
12 that if we - or do you understand that if we  
13 were to lift the suspension you still wouldn't  
14 have reimbursable detail in light of that  
15 discrepancy?

16 THE WITNESS: I would contact  
17 Sergeant Rogers first thing in the morning to  
18 reconcile this one invoice, and we'll get that  
19 taken care of immediately.

20 CHAIRPERSON MILLER: So, the  
21 question has been that there's discrepancies,  
22 and I can see that -

1 THE WITNESS: I can't hear you.

2 CHAIRPERSON MILLER: There is  
3 discrepancies, you know, and they may be at  
4 fault, who knows. But do you understand about  
5 if you don't pay ahead of time regardless of  
6 whether you think you owe them money, or they  
7 owe you money, you don't get reimbursable  
8 detail. Is that clear to you?

9 THE WITNESS: Yes, now that I have  
10 actually went over this.

11 CHAIRPERSON MILLER: And that was  
12 not clear to you before.

13 THE WITNESS: Excuse me?

14 CHAIRPERSON MILLER: That was not  
15 clear to you before Friday.

16 THE WITNESS: No, ma'am, it wasn't.  
17 Actually, again, SOD used to handle the  
18 payment, and we never had a problem until they  
19 actually changed hands. And I knew exactly  
20 where the office was, and I could go down and  
21 actually take the check and get the receipt  
22 from the officers there at SOD, where now the

1 payments are received at 300 Indiana Avenue,  
2 and cannot access the third floor where the  
3 room that they say submit the payment to, you  
4 have to wait for an officer to actually escort  
5 you upstairs. And in one of my emails there's  
6 a young lady said that they did not receive  
7 payment in that office, so I'm not sure if she  
8 knew exactly that they received the payments  
9 there.

10 CHAIRPERSON MILLER: Okay.

11 THE WITNESS: And I did, you know,  
12 make the statement that the payment was  
13 actually delivered to the address that was  
14 listed on the invoice.

15 CHAIRPERSON MILLER: Okay. All  
16 right.

17 MR. SHORT: I have one -

18 CHAIRPERSON MILLER: Okay, Mr.  
19 Short.

20 MR. SHORT: As a result of this  
21 suspension that you're under right now, should  
22 you be able to open up, are there going to be

1 any changes as a result of this incident?

2 THE WITNESS: Yes, sir. And I think  
3 we're going to increase our communication. I  
4 think I'm going to invest in a couple of two-  
5 way radios. I would like to put some  
6 additional cameras outside of the building,  
7 and just more training of the security  
8 personnel.

9 MR. SHORT: Thank you. That's all I  
10 have, Madam Chair. Thank you.

11 CHAIRPERSON MILLER: Okay. No other  
12 Board questions?

13 MR. LeFANDE: It's your witness -  
14 oh, I'm sorry. I guess, do I go first?

15 MR. ADAMS: Yes.

16 CHAIRPERSON MILLER: Yes. So,  
17 questions on Board questions?

18 MR. LeFANDE: I apologize.

19 CHAIRPERSON MILLER: That's all  
20 right.

21 MR. LeFANDE: I just got distracted  
22 there.

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

RECROSS EXAMINATION

BY MR. LeFANDE:

Q You are the sole owner of MPAC, LLC. Is that correct?

A Yes, sir.

Q And are you the sole - so that makes you the sole member, I believe is the term they use for that?

A Yes.

Q Are you - is there any other officers of the LLC?

A No, sir.

Q Okay. So, your son is neither a member nor an officer of the LLC?

A No, he's an ABRA Manager. He's been trained - he's -

Q I'm discussing the corporate form, the LLC.

A Oh, no, sir, he's not.

Q Okay. But as an ABRA Manager, he does he have any capacity to contract on behalf of the establishment?

1           A       No, sir.

2           Q       You said that he doesn't now, but  
3 before he had no capacity to contract.

4           A       No, sir.

5           Q       Okay. And you were unaware of any  
6 agreement that he had signed.

7           A       No, sir.

8           Q       And he was without any authority to  
9 sign any such agreement.

10          A       Correct.

11          Q       And you don't know when that  
12 agreement was signed because there's no date  
13 on it. Is that correct?

14          A       Correct.

15          Q       Okay. And you stated that the  
16 reimbursable detail is valuable to the venue  
17 when it worked. Is that correct?

18          A       Yes, sir.

19          Q       There's positives and negatives.  
20 You stated that once upon a time there was six  
21 cars with officers scattered about, and now  
22 there's two cars with four officers in them.

1           A       Yes, sir.

2           Q       And is it in fact the case that  
3 when SOD ran this detail you got six cars.

4           A       It varies. The officers, they -  
5 most of the time cruisers are not available,  
6 they have to wait on available cruisers that  
7 they could use for the detail, because it's  
8 not your regular officers that patrol the PSA,  
9 so whatever cruisers are left over, this is  
10 what the detail get.

11          Q       Well, it's since been taken over by  
12 the Office and whatever by the Police  
13 Department.

14          A       Yes.

15          Q       You've seen that now you get less  
16 cars.

17          A       Yes.

18          Q       More officers in the car, and the  
19 officers not spreading out.

20                   MR. ADAMS: Objection in terms of  
21 relevance in terms of -

22                   CHAIRPERSON MILLER: Sure, you're

1 just repeating the testimony, and it's 7:07.

2 MR. LeFANDE: I want to make sure I  
3 understood. I'm putting a connection - there  
4 was a missing connection there which was as to  
5 the fact that this change with - the witness  
6 testified that there used to be multiple cars,  
7 multiple officers scattered around. And now  
8 there's two cars with officers crammed all  
9 into one car. And the connection that I was  
10 trying to make that may have been overlooked  
11 was the fact that corresponded with the  
12 transaction from SOD doing this as a special  
13 event detail to this being a money-making  
14 operation from the corporate office of MPD.

15 MR. ADAMS: Wow.

16 CHAIRPERSON MILLER: Yes, right.

17 MR. ADAMS: I'm not sure that comes  
18 in evidence, but -

19 CHAIRPERSON MILLER: All right.

20 MR. ADAMS: This is irrelevant.

21 CHAIRPERSON MILLER: It's not in  
22 evidence.

1 MR. ADAMS: Okay, thank you.

2 CHAIRPERSON MILLER: It's an  
3 attorney testifying, so no.

4 MR. ADAMS: It's not relevant.

5 CHAIRPERSON MILLER: Right.

6 MR. ADAMS: But the question is our  
7 argument of the question regarding SOD and now  
8 this whole case is about in terms of where we  
9 are in 2014, whether there's safety, how their  
10 detail operated back in 2011, 2012 is not  
11 relevant.

12 CHAIRPERSON MILLER: And the  
13 questions should be pretty finite based on the  
14 Board questions. There weren't that many.

15 MR. LeFANDE: I'm sorry.

16 CHAIRPERSON MILLER: Okay. Okay. Do  
17 you have any, Mr. Adams?

18 MR. ADAMS: Yes, the District does  
19 have a couple of questions.

20 CHAIRPERSON MILLER: Okay.

21 REDIRECT EXAMINATION

22 BY MR. ADAMS:

1           Q       So, during Mr. Short's questions  
2           you referred to an incident regarding the  
3           closure that in your opinion was mistaken  
4           because it related to someone being pushed  
5           into, I guess, a fire extinguisher prong, or  
6           something of that nature?

7           A       During a previous closure?

8           Q       Yes.

9           A       Well, I think it was mistakenly  
10          documented as a stabbing.

11          Q       Okay.

12          A       With a -

13                 MR. LeFANDE: I'm sorry. Just  
14          objection. The Attorney General has  
15          characterized this as a closure proceeding,  
16          and I think it's confusing the witness. There  
17          was no closure proceeding, it was a 251 Fact  
18          Finding. And if we want to be - if he can  
19          restate his question such that he's not making  
20          incorrect -

21                 CHAIRPERSON MILLER: Okay.

22                 MR. LeFANDE: - statements or fact

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

-

CHAIRPERSON MILLER: Okay.

MR. ADAMS: I consider myself corrected. That's cool.

MR. LeFANDE: Sorry. If he could just restate it, because I think that -

CHAIRPERSON MILLER: Yes, he got it. He's going to restate it. He's going to restate it. He's going to restate it. Go ahead.

BY MR. ADAMS:

Q You stated - you spoke regarding a Fact Finding inquiry involving a fire extinguisher. Correct?

A A fire extinguisher hanger.

CHAIRPERSON MILLER: Hanger.

BY MR. ADAMS:

Q Okay, hanger. When did that occur?

A I don't recall, sir. I would have to look at the previous case file to be exact.

Q Okay. All right. That occurred prior to September 2012. Isn't that correct?

1           A       I don't recall.

2           Q       Okay. And the last time we had a  
3 hearing regarding closure was September -  
4 prior to this hearing, the last time we had  
5 a hearing was in approximately September-  
6 October 2012. Correct?

7           A       I think it was something related to  
8 the incident that took place over the bridge  
9 on Queen's Chapel Road.

10          Q       Okay. So, that Fact Finding would  
11 have occurred prior to that - would occur  
12 prior to the Queen's Chapel bridge incident.  
13 Correct?

14          A       Which Fact Finding?

15          Q       The Fact Finding regarding the fire  
16 extinguisher.

17          A       Yes, sir, I think so.

18          Q       Okay. Now, we were talking - it  
19 was spoken about regarding your payments. You  
20 have Exhibit CC. Why don't you refer to that?

21                   MR. LeFANDE: Objection. I think  
22 we're wandering off from the Board's

1 questions. It's supposed to be questions in  
2 response to the Board's questions. I don't  
3 recall anything about Exhibit CC being  
4 mentioned by the Board.

5 MR. ADAMS: The - well, in general  
6 the Board has been - has asked questions  
7 regarding the payment of outstanding amounts  
8 to the District of Columbia, so it goes to  
9 that issue.

10 CHAIRPERSON MILLER: Okay. I did ask  
11 a question about that personally.

12 MR. ADAMS: Right.

13 CHAIRPERSON MILLER: Okay.

14 BY MR. ADAMS:

15 Q So just to make sure, now we spoke  
16 regarding invoice 2449. Correct?

17 A Yes, sir.

18 Q Listed here as invoice 2651 on -  
19 within the exhibit. I think that's the second  
20 to last line there.

21 A Yes.

22 Q All right. And what checks or

1 invoices have you put before the Board  
2 regarding that invoice?

3 A I would have to check with my  
4 counsel to see if all the checks were  
5 submitted. Now, to my knowledge on this list  
6 all have been paid except the 2449.

7 Q Okay.

8 A And I may have a copy of that in my  
9 briefcase.

10 MR. ADAMS: I have no further  
11 questions.

12 CHAIRPERSON MILLER: That's it?

13 MR. ADAMS: That's it.

14 CHAIRPERSON MILLER: Okay. Thank  
15 you. You can you be excused now, believe it or  
16 not.

17 MR. LefANDE: Come back to being a  
18 party now.

19 MR. ADAMS: No, I think this is your  
20 exhibit. I think everything else is your's.

21 CHAIRPERSON MILLER: Okay. So, I  
22 think everyone has put into evidence all the

1 documents that you want to put into evidence.

2 Correct?

3 MR. LeFANDE: I believe that's the  
4 close of the Respondent's rebuttal case to the  
5 Government's case.

6 CHAIRPERSON MILLER: Okay. Ready for  
7 closing?

8 MR. LeFANDE: I'd like to freshen up  
9 before I start.

10 CHAIRPERSON MILLER: Okay. Do you  
11 want to - that's all right. A five-minute  
12 break.

13 (Whereupon, the proceedings went  
14 off the record at 7:14 p.m. and went back on  
15 the record at 7:20 p.m.)

16 CHAIRPERSON MILLER: Okay. We are  
17 back on the record and ready for closing  
18 arguments. Are you ready, Mr. Adams?

19 MR. ADAMS: Yes, I am.

20 CHAIRPERSON MILLER: Okay.

21 MR. ADAMS: As always.

22 CLOSING ARGUMENT OF THE DISTRICT

1                   MR. ADAMS: Madam Chairman, the  
2                   District -- the situation that happened on May  
3                   17th, through the length of this hearing that  
4                   we may have gotten away from, was the matter  
5                   a serious danger to the community. The  
6                   incident is something that shows the  
7                   establishment and its operations presents  
8                   imminent danger to the safety and health of  
9                   the public.

10                   As part of arguments that you've  
11                   heard over a two-day period, none of the  
12                   information that has been provided here  
13                   refutes what has been presented to the Board  
14                   to show that the establishment does not  
15                   present such a safety health hazard. Instead,  
16                   it's been proven.

17                   What has been shown, unfortunately,  
18                   is for whatever reason a lack of  
19                   accountability by the establishment and  
20                   frankly, a failure to give credit to the facts  
21                   that are at hand. If that is the case, that  
22                   only leads credence to the chief of police

1 closure on May 17th. Now, let's discuss some  
2 of the clear issues.

3 The clear issues that we have  
4 established through the testimony is that  
5 obviously five people were shot with a firearm  
6 along Adams Place within close proximity of  
7 the establishment and there's really no  
8 dispute regarding that regard. And that's an  
9 unfortunate incident. I mean, five people were  
10 wounded with gunfire, therefore, presented  
11 injuries that impact their lives and  
12 livelihoods, some of those injuries  
13 potentially life threatening.

14 We have established with evidence  
15 through the police department officers and the  
16 video footage that the victims were patrons of  
17 The Scene -- not anywhere else, but of The  
18 Scene. We also have, as a Board and it's  
19 already been acknowledged through  
20 administrative notice, that this isn't the  
21 first time that we've had such closure  
22 incidents and summary suspension cases

1 regrading the establishment.

2                   So we know that there is an issue  
3 regarding the type of crowds or patrons or the  
4 fact that this establishment must take  
5 particular safeguards in order to assure the  
6 safety and health of both the patrons involved  
7 and of the community at large. However, that  
8 did not happen. The establishment on the  
9 night of May 17th did not have Metropolitan  
10 Police Department reimbursable detail and  
11 there's no dispute about this. Whether they  
12 wanted to and there's a reason they didn't,  
13 maybe we can have argument regarding that.  
14 But it wasn't there.

15                   But yet, there was live  
16 entertainment at the establishment. There was  
17 a crowd of over 350 people that was within the  
18 establishment and there -- and there was music  
19 that was being played and there was a need for  
20 security to intervene into issues within the  
21 establishment on that night.

22                   It has been established through the

1 testimony of witnesses that there certainly  
2 was an expectation from the police department  
3 that -- or there was some belief that there  
4 was supposed to be a requirement of there  
5 being a reimbursable detail. Why? Well, to  
6 help control situations that have -- that  
7 occurred outside of the establishment and to  
8 help ensure that there is order outside the  
9 establishment.

10 Now, within the evidence that we've  
11 had, we've had information regarding whether  
12 or not there had been acknowledgment by the  
13 establishment or some type of or rules  
14 regarding and, of course, any program has  
15 rules and requirements and we -- and the  
16 District, through Sergeant Rogers, was telling  
17 us those rules that this is a program where  
18 payment must be done in advance. In fact,  
19 that was acknowledged by the owner, Mr.  
20 Blakeney, although as a courtesy, the District  
21 may allow things to happen after the fact.  
22 But there are rules in which the program

1 operates.

2 Now, somehow -- now, and the Board  
3 can -- is allowed to make an inference in  
4 terms of the credibility of the statements  
5 that are made. The establishment has now  
6 stated that an agreement that was signed by a  
7 senior member of the establishment is null and  
8 void and that the owner of the establishment  
9 had no knowledge whatsoever of it despite the  
10 fact that since 2012 reimbursement of detail  
11 officers have continued to be in front of the  
12 establishment despite the fact that there's  
13 knowledge that of a change in the operations  
14 from SOD to the current situation with the  
15 report of Patrol Services and School Security  
16 Bureau.

17 In fact, even acknowledging that  
18 they think that they've had to go to 300  
19 Indiana Avenue, there's no knowledge of their  
20 change in the program. Now, that strikes --  
21 that seems extreme -- that seems a bit  
22 incredible. That seems very hard to believe.

1                   But be it as it may, the  
2                   requirements are in place and the Board can  
3                   make its own determination about whether or  
4                   not the contract existed or there's awareness  
5                   of the contract. Either way, it is  
6                   problematic. With that being said, there is  
7                   a rule that payments may be -- are to be made  
8                   in advance and any issues regarding  
9                   discrepancies are to be made within a day, not  
10                  months and months afterwards, of the so-called  
11                  discrepancies.

12                  In fairness, the District of  
13                  Columbia has made certain credits, but bottom  
14                  line, the District of Columbia has said,  
15                  because after all, an establishment is -- the  
16                  reimbursable detail is paid for by the -- by  
17                  the establishment. If it's not paid for by  
18                  the establishment, the money comes from a  
19                  different source and the evidence shows that.

20                  So are establishments entitled to  
21                  keep on receiving services? Are  
22                  establishments -- is that some form of

1 obligation on the part of the District when  
2 the evidence shows that there is an extended  
3 period over -- at the time of the notice of a  
4 four-month period where no payments have been  
5 received. So the District did exercise its  
6 options.

7 We also talked about how the detail  
8 came to be. We have shown through the  
9 evidence and through the administrative record  
10 of this Board, regardless of whether -- that  
11 there was either a requirement and a minimal  
12 expectation of a reimbursable detail being  
13 supplied to the establishment and for  
14 continuing operations.

15 On at least three occasions -- a  
16 summary suspension hearing, a continuation of  
17 a summary suspension hearing, a submission by  
18 the establishment to the Board, the statements  
19 within the establishment security plan -- over  
20 and over again, at a fact finding hearing in  
21 2011 regarding an amount of detail to be  
22 there, that this was necessary for the safety

1 of the establishment's continued operation.

2 The Board can look at the witness  
3 testimony. Does that seem credible? Were  
4 orders -- now, I know this establishment  
5 unfortunately has come before this Board more  
6 than five or have -- has had closures more  
7 than five times. It's had now their third  
8 summary suspension hearing.

9 But does this seem credible? The  
10 establishment comes here, has a discussion  
11 about whether a requirement if that's  
12 enforceable or expectations when the Board  
13 discusses conditions that establishment  
14 doesn't have knowledge of it -- doesn't have  
15 recollection. These are the every essence of  
16 the most important requirements of the  
17 operations of an establishment. They deny  
18 having any knowledge of that either. Okay.  
19 We'll just continue.

20 But let's get back at the  
21 situation. Now, why -- and again, with the  
22 references of provisions within the security

1 plan, there certainly was contemplation of it.  
2 It's there in multiple places and that was  
3 made and referenced in Investigator Peru's  
4 report.

5 So let's go to the situation at  
6 hand. Now, we know that from the  
7 investigative record that there's been a few  
8 violent incidents at this establishment. But,  
9 however, it has been in closure since 2012.  
10 So we know that there is an importance -- the  
11 Board can infer there's importance that there  
12 is special attention that is placed here.  
13 However, none of this has shown that the  
14 violence amongst patrons of the establishment  
15 has continued.

16 The evidence shows that MPD, even  
17 when there is a detail, has had to deal with  
18 fights amongst the patrons who have come out  
19 of the establishment and other violent  
20 incidents. And then after a cancellation of  
21 such service, the evidence shows that such  
22 incidents have increased.

1                   So how -- so what has been the  
2                   impact? Well, on -- along Adams Place the  
3                   evidence has shown that all the officers had  
4                   to intervene. Officers who were dedicated to  
5                   reimbursable detail for other establishments  
6                   had to leave their posts in order to deal with  
7                   issues of violence along Adams Place.

8                   They've had to draw resources,  
9                   including on the night of the incident on May  
10                  17, to bring -- redirect resources from other  
11                  areas to help in this area. In fact, the  
12                  District had Exhibit 2 placed into evidence  
13                  from the beginning, which was the public  
14                  document from the investigative report.

15                  So this is part of the record. The  
16                  Board can even make reference there that as  
17                  early as March, there are additional reports  
18                  at MPD regarding the amount of attention that  
19                  had to be placed upon Adams Place by those  
20                  who've been the -- by officers within the  
21                  patrol unit. So we've established here that  
22                  there's been continuing incidents on along

1 Adams Place and within the 1000-foot perimeter  
2 regarding the patrons of this establishment.  
3 And so we've also made very clear how  
4 important safety is.

5 So let's look at the facts,  
6 specific facts, of this incident. Now, I want  
7 the Board to remember the security footage  
8 that you -- that was viewed on Friday. Now,  
9 according to the evidence that we have put in  
10 front of you, you can see and you can even  
11 look from your own eyes that you saw that  
12 there was a single patron led out of the  
13 establishment at approximately 2:48 a.m. and  
14 you saw that another security officer escorted  
15 someone else out of the establishment. Then  
16 several people came afterwards.

17 You can see with your own eyes that  
18 one of those people were involved and stayed  
19 was speaking with the security officer but  
20 stayed within the vicinity of the  
21 establishment -- was not led to the exit gate.  
22 You can see with your own eyes that it

1 appeared that that person appeared to become  
2 vocal. You can also see with your own eyes  
3 that that person became closer to the  
4 establishment's doors. Not further from,  
5 closer.

6 Now, the version that we're being  
7 asked -- and you also can see for your own  
8 eyes that a group of people, about 10 or 15  
9 people, crowding outside and there is some  
10 form of commotion and the evidence has  
11 established that.

12 Now, according to the  
13 establishment's version, it's all one group.  
14 All one group -- all in the family. There is  
15 an acknowledgment that something did happen,  
16 that there was pushing and shoving. Now,  
17 we're to believe -- they've been doing this  
18 pushing and shoving, that it's all -- it's all  
19 pushing and shoving amongst the same group,  
20 amongst allies. Now, does that seem  
21 reasonable? Does that seem credible?

22 The Board can make the inference in

1 terms of that. But the Board can also make --  
2 again, can use its own eyes to see there was  
3 -- to see that where there seems to have been  
4 some form of altercation, that there was no  
5 separation. The Board can also see with its  
6 own eyes that once the persons were on Adams  
7 Place, that there appeared to be a physical  
8 altercation right on Adams Place, right  
9 outside the gates, right outside of the  
10 premises.

11 And we know that this was the same  
12 group that you saw being led out of the doors,  
13 and then the -- from your own eyes, the Board  
14 can then see that they went up the street, not  
15 far away. Not far away. We can talk about  
16 whether it's closer to Queens Chapel or  
17 wherever, but we've already established that  
18 they're all patrons of the same establishment.  
19 There's no one else coming in here, to our  
20 knowledge.

21 But the -- but then you see, within  
22 a couple of minutes, a shooting, and it seems

1 to be connected -- and now, again, you can  
2 make an inference were they all in the same  
3 group? When we see people fighting right in  
4 front on Adams Place, were they all in the  
5 same group? Does that seem like - what  
6 happens in the same group? There was some  
7 type of disagreement that was there.

8 And so what makes more sense, that  
9 a shooting happens because of a dispute that  
10 came directly out of the establishment or  
11 everyone's from the same group and then a  
12 shooting happens? That, you know, what makes  
13 more sense to the Board? And I think the  
14 District's analysis and the facts that have  
15 been established make more sense.

16 And so what happened afterwards?  
17 The evidence shows that it was complete and  
18 utter chaos, that due to there not being an  
19 ability to manage traffic prior to the fact,  
20 that people were getting out, that there was  
21 a lot of trouble in order for the District to  
22 be able to have a response by emergency

1 resources and emergency helpers and the  
2 evidence shows that.

3 One thing is that -- so the Board  
4 can make an inference, did the establishment  
5 properly defuse the situation. Now, from  
6 their own testimony here, they said well,  
7 there was especially high emotions amongst the  
8 patrons. Well, if there's especially high  
9 emotions, shouldn't there especially be  
10 especially high response in terms of defusing  
11 such emotions? Did it happen? Were any of  
12 the actions consistent with the security plan  
13 that was put in place in terms of how do you  
14 deal with patron fights? Was there proper  
15 separation, was there someone going through  
16 separate exits, were there anything of the  
17 sort?

18 Now of course, again, it's  
19 convenient for the establishment to state that  
20 oh, it was all the same group. But the thing  
21 that's very interesting is that you have Mr.  
22 Harris who came in. He gave good testimony

1           about what happened -- what he saw. He says  
2           he only had training from -- he only had  
3           training from Mr. Jones and from Mr. Blakeney.  
4           Of course, it doesn't seem he had any idea of  
5           a security plan, which is kind of troubling  
6           considering that, you know, this is put in  
7           place and based upon the history of incidents  
8           and based upon the need to address that, can  
9           the establishment then come in here now and  
10          say hey, we're doing so much to address issues  
11          that it doesn't actually follow the -- what  
12          they put -- they bring before the Board.

13                         And then you look at the head of  
14          security and his testimony. Did he ever refer  
15          to a security plan? He referred to how he  
16          trained people. He said well, because of my  
17          experience in corrections and I train people  
18          based upon what they observe. Wow, that seems  
19          extremely informal. He didn't refer to a  
20          security plan, so there's -- you can't infer  
21          whether any people even knew about any of  
22          these requirements. So if you can -- if the

1           -- if that is not used as a basis for  
2           training, then how can the establishment  
3           comply with the plans that they give to the  
4           Board? Is it lip service? That's what it  
5           appears to be.

6                         And again, you can look at that  
7           testimony where the persons -- where the  
8           person said that things happened in an orderly  
9           fashion, which is -- seems to be refuted by  
10          the testimony and what you saw even from his  
11          -- from his testimony saying that a shooting  
12          happened while he was still escorting a group  
13          out of the establishment. Again, that's not  
14          what the evidence points to.

15                        Sorry. Board's indulgence. So in  
16          the end, Members of the Board, and I will  
17          reserve a couple minutes for a rebuttal, this  
18          establishment has had several opportunities to  
19          address dangerous situations that occur there.

20                        And based upon the evidence, they  
21          have not complied with those requirements or  
22          those expectations. Given the gravity and

1 given the facts you have before you, and given  
2 the amount of incidents that have occurred and  
3 believe and again, before I conclude, do note  
4 that there were -- that even within their  
5 references, they have noted an incident in  
6 March when there was no detail regarding -- a  
7 separate incident regarding gunfire within the  
8 proximity of the establishment.

9 The Board has enough information to  
10 infer and to make a conclusion the  
11 establishment, based upon its operations,  
12 based upon how the patrons behave through  
13 continuing operations does create imminent  
14 danger, and I reserve a couple of minutes on  
15 rebuttal.

16 CHAIRPERSON MILLER: Okay.

17 CLOSING ARGUMENT OF THE RESPONDENT

18 MR. LeFANDE: The premise of the  
19 Government's argument is profoundly  
20 disturbing. The Government does not claim  
21 that any shortcoming that they can identify of  
22 the security plan or its implementation led to

1 the violence that occurred on Adams Place.

2 The argument -- the inference that  
3 the Government is asking you to make is that  
4 the persons who patronize this establishment  
5 are predisposed to violence and for that  
6 reason, the establishment must be closed  
7 because the persons who patronize this  
8 establishment cannot control themselves. This  
9 is to say that a particular demographic is  
10 predisposed to violence, that a particular  
11 group of people who listen to a particular  
12 kind of music are predisposed to violence.

13 This is offensive and  
14 discriminatory to our First Amendment rights  
15 and it is just absolutely being worn on the  
16 shoulder of the attorney general as he asks  
17 for how certain patrons behave and the  
18 inference that should be made from it.

19 We have asked the Board to examine  
20 what it is that the establishment did that led  
21 to the violence. The patrons of the  
22 establishment are not before the Board. The

1 patrons of the establishment have the right to  
2 come into free assembly and have a right to  
3 listen to the music they want to and the  
4 establishment has an obligation to perform  
5 reasonable measures to ensure their safety.

6 This is not to guarantee that there  
7 will not be violence. This is an impossible  
8 burden to ask of the establishment and it is  
9 an inappropriate burden because it requires  
10 the premise that the attorney general demands,  
11 that a certain kind of person is predisposed  
12 to criminal activity, is predisposed to  
13 violence and that is discriminatory and that  
14 is offensive to our Constitution.

15 These folks have a right to go out  
16 at night and enjoy themselves and if the --  
17 what has been demonstrated here tonight and  
18 the previous hearing before is extraordinarily  
19 competent efforts by the establishment to  
20 provide that safe location, the safe venue for  
21 these -- for these persons to go out. You  
22 cannot regulate away a demographic. That's

1           what I'm hearing and it horrifies me and I  
2           hope it horrifies this Board. You cannot  
3           regulate a kind of music. You cannot regulate  
4           away a style of clothing. This is horrific  
5           and it's exactly what the Government demands  
6           now.

7                         Now, we have heard first from  
8           Officer Jose Hernandez. He testified he saw  
9           500 people in the street on Adams Place, yet  
10          there were only 350 people in The Scene. So  
11          if there's 500 people in the street, where are  
12          the rest of these people coming from? It's  
13          not in -- there is no connection necessarily  
14          to the establishment and the people in the  
15          street.

16                        There is other -- this  
17          establishment does not exist in a vacuum. It  
18          is not something we see in a Western movie  
19          where there's 100 miles of road in either  
20          direction and there's this place standing by  
21          itself. It is in, among, a number of  
22          establishments next to a very busy

1 thoroughfare and in a neighborhood that has  
2 often had difficulties.

3           If Officer Hernandez says there's  
4 500 people in the street, that has to say  
5 something about what is that there are these  
6 350 people are of The Scene? It's not -- they  
7 can't all come from The Scene because they  
8 weren't -- there weren't that many people in  
9 The Scene. He talked about a traffic problem  
10 that is inherent with uniform closing hours  
11 that you shut -- that you have a mandate in  
12 this city that says that a club is going to  
13 close, every club is going to close at 3:00  
14 a.m.

15           Well, what happened in this  
16 instance? You saw the establishment doing  
17 what they call a soft closing. They closed  
18 early. They turned the lights on before they  
19 had to, to start moving people out of the  
20 establishment before the big bubble came and  
21 they were attempting to do that before any  
22 criminal act occurred out on the street.

1                   And in response to Chairperson  
2                   Miller's inquiry, Officer Hernandez says there  
3                   weren't many instances of violence at The  
4                   Scene, but yet the next person we hear from is  
5                   Sergeant Copp. Sergeant Copp just got there.  
6                   He just got promoted in January. He doesn't  
7                   know a thing about this area and he doesn't --  
8                   he's not even sure why he was here. He has no  
9                   experience and he has never been to this  
10                  particular area. He doesn't go here. Just  
11                  superfluous testimony to pad a nonexistent  
12                  case by the Government.

13                  We heard from Sergeant Rogers, the  
14                  consummate bean counter of the corporate  
15                  affairs of the Metropolitan Police Department.  
16                  The corporate affairs of the Metropolitan  
17                  Police Department? The Metropolitan Police  
18                  Department is a public entity providing police  
19                  services. It is not a for-profit corporation  
20                  and it needs to stop being treated as one.

21                  The Metropolitan Police Department  
22                  is to provide public safety services to the

1           general public and since we've had this  
2           transition of this corporate creed to the  
3           police department, we have bean counters like  
4           Sergeant Rogers who are saying, I have no  
5           discretion in allowing a reimbursable detail  
6           at The Scene because there are disputed  
7           invoices.

8                         Withholding public safety services  
9           by a publically-funded entity to a taxpaying  
10          business -- that's what we heard. Again, this  
11          is horrific. This is offensive. You cannot  
12          turn the Metropolitan Police Department into  
13          a McDonald's. It is for the benefit of the  
14          general public and you do not withhold  
15          services from someone because there's a  
16          dispute over invoices. You don't withhold  
17          police services from indigent persons in  
18          public housing projects. You do not withhold  
19          EMS services from illegal aliens because they  
20          don't meet your requirement.

21                        Yet, that is what Sergeant Rogers  
22          is saying. Not only is he saying he's doing

1           it, he's saying he has no discretion not to do  
2           it because it's coming from the office of the  
3           chief financial officer. His own records show  
4           the establishment paying \$24,000 in payments  
5           between February and March, trying to bring  
6           this into an accord despite there already  
7           being evident problems with their own  
8           bookkeeping and there being huge procedural  
9           lapses in the accountability for these things.

10                   The Government has harped on this  
11           idea that there was this 24-hour window in  
12           which the establishment could just note a  
13           discrepancy. The establishment doesn't  
14           receive those invoices for months afterwards.  
15           What this -- what the actual language of this  
16           document says is that the watch commander is  
17           supposed to be notified of no-shows -- not the  
18           office of the chief financial officer, not  
19           Sergeant Rogers.

20                   There is this huge disconnect where  
21           the person who is supposed to be doing the  
22           public safety element of this policing

1 business is not communicating with this new  
2 for-profit obscene business of generating  
3 revenue for public safety services that should  
4 be borne as a burden as a whole by the public.

5 And there's -- and because they  
6 have now taken it upon themselves to make this  
7 obscene for-profit business out of the -- out  
8 of public safety policing, there's no  
9 provision in this agreement as to a time limit  
10 to challenge an invoice. No mechanism for  
11 direct notification of Rogers' office that  
12 there is a problem.

13 The evidence plainly shows that by  
14 January of this year the establishment was  
15 asking for reconciliation and that the  
16 evidence plainly shows that once the detail  
17 was under a microscope there were huge  
18 discrepancies, thousands and thousands of  
19 dollars.

20 Sergeant Rogers says he will not  
21 send a detail until the invoices are paid in  
22 full. But until May 14th, nobody knows what

1           that amount is. It's not clear anywhere.  
2           Nobody knows what paid in full is supposed to  
3           mean because nobody knows what the correct  
4           amounts are until May 14th, just a couple of  
5           days before this incident.

6                         We heard from Sergeant Ferretti.  
7           He says I'm here, I'm on the ground, I'm the  
8           person responsible for dealing with these  
9           reimbursable details and I have a great  
10          relationship with The Scene. They do what  
11          they're supposed to be doing.

12                        This is only a money issue. Again,  
13          withholding public safety services for a  
14          profit motive, despite the enormous burden  
15          that the establishment already pays in taxes  
16          and fees, which are supposed to fund these  
17          public safety services.

18                        Sergeant Ferretti says he never had  
19          an issue with The Scene and whether the detail  
20          was there or not, it's the same either way.  
21          He's there, he has officers there, this is a  
22          commercial area providing a outlet for folks

1 to go have a good time to the general public.  
2 And for all the years that I was in the police  
3 department, when there was a place that had  
4 nightclubs, you sent -- there were police  
5 officers on short beats that worked there  
6 because those nightclubs were paying their  
7 taxes and they were entitled to police  
8 services and those police services were never  
9 withheld because of a dispute over an invoice.

10 We heard from Investigator Peru.  
11 He said that the establishment fully  
12 cooperated in his investigation. There has  
13 been no allegation of after hours operations.  
14 They were shutting down before they had to.  
15 Why? Because they did not want to contribute  
16 to the inherent regulatory -- regulatorily-  
17 created problem of having this bubble of  
18 everyone leaving at three o'clock in the  
19 morning. They left early. They said, we have  
20 made our money for tonight. We're going to  
21 close now and we're going to start letting  
22 these people out.

1                   Now, Chief Short said -- asked a  
2                   lot of questions about underage drinking.  
3                   There's no allegation of that here and there  
4                   is no nexus between any underage drinking and  
5                   the -- and the events that transpired on the  
6                   morning of May 17th. There is no allegation  
7                   that any weapons made it into the club. The  
8                   events that we heard about, looking at Page 3  
9                   of the investigative report, say that a person  
10                  got out of a car -- this is the bottom of Page  
11                  3 of the investigative report.

12                  Mr. Caveness stated that he was  
13                  walking to his car when the shooting occurred.  
14                  He stated that he saw a carful of males pull  
15                  up to another group of people, get out of the  
16                  vehicle and begin to fight. He stated that  
17                  one of the males from the vehicle pulled out  
18                  a gun and started shooting into the crowd.  
19                  We have an eyewitness statement here, in your  
20                  own investigative report, that says that  
21                  somebody's driving up here and being involved  
22                  in the shooting.

1                   It absolutely refutes the  
2                   Government's conclusory, completely  
3                   unsupported allegation that any of these  
4                   altercations that they describe in the club  
5                   had anything to do with a group of males  
6                   driving up to the location and begin shooting.  
7                   It's right in your own report. That is a  
8                   complete disconnect from the Government's  
9                   argument and completely refuted.

10                   Further, when there were these  
11                   altercations in the club that night, you saw  
12                   this on the video, immediate response from the  
13                   -- and appropriate response from the  
14                   establishment that as things happened the  
15                   establishment members were there immediately  
16                   and were immediately addressing them.

17                   There's no suggestion for a moment  
18                   that any deficiency in the security plan, its  
19                   implementation, the number of persons that  
20                   they employed, their training or their  
21                   supervision in any way aggravated the  
22                   situation. They were immediately there, they

1 immediately addressed the issues and they did  
2 it appropriately and efficiently and there is  
3 no evidence whatsoever to the contrary.

4 The District of Columbia Court of  
5 Appeals demands that you show an ongoing  
6 disregard for your security plan and ongoing  
7 failures in your security plan to hold an  
8 establishment like this liable for its -- for  
9 failing -- for its failings. None of that has  
10 been shown and, in fact, the evidence shows  
11 exactly the opposite.

12 Investigator Peru shows people  
13 being ushered out. We started to see it and  
14 he was -- I will give Investigator Peru some  
15 credit here. He was reserved about it. When  
16 we were here last time in 2012, we had a very,  
17 very disturbing situation with the  
18 investigator unrealistically characterizing  
19 the video, in front of our own eyes, as being  
20 assaultive or combative when it wasn't there,  
21 and Investigator Peru was very reserved about  
22 this. He wanted to say here is the

1           altercation and okay, we see some people  
2           moving around there.

3                       But even by his own testimony,  
4           there was nothing out of control here. The  
5           establishment was immediately responsive to  
6           what was going on and they handled everything  
7           appropriately. Every person in that  
8           establishment had been security screened.  
9           There's no allegation that the person who did  
10          the shooting came out of the club with a  
11          weapon. The evidence shows exactly the  
12          opposite. They drove up. They had nothing to  
13          do with the club, despite these conclusory  
14          allegations to the contrary by the chief of  
15          police and by the attorney general.

16                      There is no standing order for a  
17          reimbursable detail for this establishment.  
18          2509(e) of the District of Columbia Code, the  
19          Administrative Procedures Act, requires that  
20          these matters be reduced to writing and that  
21          they be accompanied by a findings of fact and  
22          conclusion of law.

1                   Why is that? Because they become  
2                   part of the public record. The District of  
3                   Columbia Register publishes every single one  
4                   of these orders and the Board publishes them  
5                   on their own website. They become public  
6                   record so that the ANCs, the citizens, the  
7                   press, the police department can go and see as  
8                   part the record what is the -- what are the  
9                   limitations upon this establishment.

10                   There is no voluntary agreement.  
11                   This document that the District of Columbia  
12                   offers is not a voluntary agreement. It's not  
13                   part of the regulatory regime of the Alcoholic  
14                   Beverage Administration. It is -- it's wholly  
15                   superfluous. It is nothing. It is not  
16                   something recognized by this Board or the law  
17                   in the limitations upon the operation of the  
18                   establishment.

19                   We have been over and over and over  
20                   again in this Board about voluntary  
21                   agreements. What does a voluntary agreement  
22                   mean? If there is a violation of a voluntary

1 agreement, that becomes a violation of the  
2 liquor law. It says so, and because a  
3 voluntary agreement is something that this  
4 Board approves and is something that is  
5 recognized by the law and is a predicate to  
6 the license. No one suggests for any moment  
7 that there has been any such agreement that  
8 has been proffered to this Board and approved  
9 by this Board. The District of Columbia has  
10 offered a document that has no date on it and  
11 purportedly signed by the owner's son. This  
12 is highly improper.

13 Investigator Peru, again, looking  
14 at these videos with you, showing you his  
15 characterization of it, but it's the persons  
16 on the ground speaking to these people.  
17 What's going on in your life that has brought  
18 me to talk to you today, and a police officer,  
19 a fireman, an emergency medical technician  
20 goes up to somebody and says what's going on  
21 -- let's hear your side of the story, and the  
22 video can't capture that.

1                   And we hear testimony from Carl  
2                   Harris, from Cornell Jones and we hear it from  
3                   the ownership that they talked to these folks.  
4                   They knew what was going on because they had  
5                   a conversation with them. Investigator Peru  
6                   was not privy to any of that and he doesn't  
7                   make any suggestion that he is. He cannot  
8                   address what the folks in the videos are doing  
9                   and why.

10                   What we want to hear -- what the  
11                   Government wants you to hear is that these  
12                   people are jumping up and down. They can't  
13                   control their emotions and therefore we can't  
14                   have a nightclub that caters to them. Again,  
15                   this is horrific. This is offensive, and it  
16                   has to be stopped by this Board and it should  
17                   never raise its ugly head again by the  
18                   attorney general, certainly not in this town.

19                   Carl Harris talks about the owner  
20                   of the establishment. As the shooting goes  
21                   down, people are running away from the danger.  
22                   The owner of the establishment runs into the

1 zone of danger to rescue persons and stays  
2 there until they're cared for. This is not --  
3 this is not just a reasonable step in a  
4 regulatory process. This is heroic. Goes  
5 into the zone of danger, runs where other  
6 people are running from to care for these  
7 people and stays there.

8 Not only did he have the  
9 wherewithal to have his equipment with him,  
10 but he goes and puts himself in harm's way to  
11 care for people that the Board -- the  
12 administration's own investigative report  
13 shows that the people doing the shooting had  
14 nothing to do with this nightclub. And Carl  
15 Harris himself stays at his post at that gate.  
16 When the shooting is going on, he stays at his  
17 post. He doesn't run away. He stays there  
18 and he creates a human shield, stopping people  
19 from going out into harm's way, along with the  
20 other security personnel. Again, this is not  
21 adequate. This is exemplary.

22 Cornell Jones, also a public --

1           also a public safety veteran, 15 years'  
2           experience doing corrections. He sent his  
3           personnel out of the establishment to search  
4           for victims and to care for them and they did  
5           that.

6                         In this first incident, we had two  
7           people, two men fussing with each other. They  
8           were separated. One went out, one stayed in.  
9           That's exactly what the -- that's exactly what  
10          the security plan called for and that's  
11          exactly what they did. Once that person was  
12          outside, they were calm, cool and collected.  
13          The Metropolitan Police Department is not  
14          going to respond to a person standing in a  
15          public place where they have a lawful right to  
16          be.

17                        CHAIRPERSON MILLER: Can I ask you  
18                        -

19                        MR. LeFANDE: They respond to  
20                        crimes.

21                        CHAIRPERSON MILLER: I'm going to  
22                        ask you - it's been about 20 minutes, I think.

1 MR. LeFANDE: I'll wrap it up.

2 CHAIRPERSON MILLER: Okay. I just  
3 wanted to see if it was --

4 MR. LeFANDE: Okay. I want to go  
5 home too.

6 CHAIRPERSON MILLER: Okay. Okay.  
7 I don't want to cut you, but --

8 MR. LeFANDE: Okay. I really,  
9 really want to go home. I just --

10 CHAIRPERSON MILLER: That's okay.  
11 I just wanted to check in to see how much  
12 longer.

13 MR. LeFANDE: Very good. Thank  
14 you. In the second incident, they weren't  
15 separated because they were all together.  
16 Separating who? These are a group of people  
17 who are together. They are not combating one  
18 another. They are dealing with people's  
19 emotions and, again, we seem to be trying to  
20 legislate or regulate away these people's  
21 emotions.

22 Now, there were no groups to assess

1           -- separate. We heard some question about  
2           what is an assault. That word is not defined  
3           in the District of Columbia law and I can  
4           point to a 20-page opinion by Judge Ruiz of  
5           the Court of Appeals. I cannot -- it just  
6           begins to chip away at what that word means.  
7           But a person standing and jumping up and down  
8           and being emotional or somebody getting shoved  
9           is going to -- you're going to have a hard  
10          time getting any traction with the  
11          Metropolitan Police Department with regards to  
12          something like that.

13                       Once the incident occurred, not  
14          only did the establishment fully cooperate  
15          with this incident, they went so far as to go  
16          to other establishments to go find video.  
17          With regards to this -- all of these invoices  
18          and these emails, what that shows is a good  
19          faith effort to try to sort this mess out and  
20          when there is very little regulatory  
21          oversight, there's no guidelines, and again,  
22          the Board cannot shut down an establishment

1           because of this perceived failure to call the  
2           watch commander over a no-show for a  
3           reimbursable detail.

4                         The evidence shows, and the reason  
5           we spent 40 exhibits -- expended 40 exhibits  
6           on this is that it shows that the  
7           establishment is struggling to do the right  
8           thing, over and over and over again and  
9           there's a fantastic paper trail to show that.

10                        The establishment wants the  
11           reimbursable detail, but there has been a sea  
12           change in the way this reimbursable detail is  
13           run and it goes from being in the special  
14           operations division where the special events  
15           folks see this as this is a place where we  
16           provide officers to staff special events, to  
17           this becoming this horrific for-profit  
18           endeavor, and suddenly instead of six cars  
19           being there, we have four officers in two cars  
20           each and they are no longer providing the  
21           coverage as required. And then saying oh,  
22           well, we're not going to give you anything

1           until it's paid in full.   But how much?   How  
2           -- we don't even know that, and once it was  
3           paid in full it was -- once it was discerned  
4           what the right amount was, it was paid in  
5           full.

6                           This is entirely a matter of an  
7           inappropriate profit motive when the mission  
8           of the police department is public safety.  
9           The inferences made -- demanded by the  
10          Government are not evidence.   There has been  
11          no showing of any violation of a security plan  
12          and there has been no nexus between any  
13          failing of the nightclub and the danger  
14          asserted.   Instead, the argument is being made  
15          that -- it's quite the contrary, is that they  
16          have done an exemplary job.

17                           But the argument made by the  
18          Government, maybe not voiced as much as such,  
19          is that we don't want this kind of crowd at  
20          this establishment and this should be  
21          profoundly offensive to this Board.

22                           Thank you.

1 CHAIRPERSON MILLER: Thank you.

2 MR. ADAMS: I'd like to take about  
3 five or six minutes, since this was a 20-  
4 minute closing argument. But I think I can go  
5 through the rebuttal fairly quickly --

6 CHAIRPERSON MILLER: Okay.

7 MR. ADAMS: -- Members of the  
8 Board.

9 REBUTTAL ARGUMENT OF THE DISTRICT

10 MR. ADAMS: Well, let me say this.  
11 This isn't about the people -- sorry. This  
12 case is not about people being affected. This  
13 case is about whether a establishment creates  
14 an imminent -- now, let's look at the  
15 language. Does a licensed establishment  
16 present an imminent danger to the health and  
17 safety of the public.

18 Now, I'll be honest with you. For  
19 this closing argument, I'm not sure what this  
20 establishment -- what hearing the  
21 establishment has been intending. It has  
22 brought in as conclusion things that are not

1 in evidence. Now frankly, that should be  
2 stricken from the record and frankly, that is  
3 the District's motion that it should be  
4 stricken from the record.

5 Anything in closing argument that  
6 is not based upon -- is not consistent with  
7 the facts with the evidence that has been  
8 stated here should be disregarded altogether.  
9 So what's really disturbing is for -- I mean,  
10 so what's disturbing to a certain extent is  
11 that it seems as though when we're here,  
12 we're taught -- the parties are in the wrong  
13 place.

14 We're talking about an  
15 establishment that's here making arguments,  
16 putting things on MPD for responsibilities  
17 that they have not made that include in terms  
18 of the very minimal and minimums and then has  
19 come in front of this Board and been  
20 completely evasive.

21 To come in front of the Board and  
22 say I don't remember what you said, I don't

1           remember what conditions you laid out -- I  
2           mean, how incredible is that when it comes to  
3           the very basic essence of trust between you,  
4           the Board members, and the establishments that  
5           operate under the Board.

6                        I mean, if that's the case, then  
7           you're going to have a very hard situation  
8           getting any compliance from any of the  
9           establishments that deal with violence or  
10          security details or anything of that sort. So  
11          let's just completely disregard it.

12                       Now, one of the things that I --  
13          that the District can't go past is this  
14          offense by something that I apparently quoted  
15          where I'm against a certain type of people,  
16          I'm against a certain kind of music, because  
17          he says office of the attorney general.

18                       Now, not one single shred of  
19          evidence, not a single argument that came out  
20          of this person's mouth, of my mouth, makes any  
21          reference to music, makes any reference to  
22          crowd. The fact of the matter is, we're

1 talking about imminent danger to the public.  
2 So if this establishment had a valet 24/7 and  
3 people are getting stabbed that came out of  
4 this establishment, then by golly, the  
5 District of Columbia would be right here doing  
6 the same thing.

7 So you look at the objective  
8 evidence. You look at what has been put here.  
9 The evidence has said that there has been a  
10 history of violence amongst patrons of the  
11 establishment coming out of the establishment.  
12 The establishment -- it has already been  
13 stated that the amount of violent incidents  
14 have increased in the last six months. The  
15 evidence has also shown that there is a reason  
16 why everyone expected that there was a detail  
17 to always be there. That's what the evidence  
18 shows.

19 So let's disregard all the stuff  
20 about discrimination because frankly, it's  
21 nonsense that takes us away from what exactly  
22 happened on this date and in dates prior --

1 incidents of violence.

2 No discrimination. We don't care  
3 what kind -- the District never talked about  
4 what kind of music that was there. So let's  
5 not -- well frankly, what's been happening all  
6 along through testimony, through the very  
7 leading testimony, has been testimony by  
8 counsel put in people's mouths.

9 So again, let's disregard this  
10 constant attempt to testify -- to add  
11 testimony to the record. So let's see here.  
12 So Officer Hernandez says there's 500 people  
13 and so -- now, he's running to the  
14 establishment. He's got his gun out. He's  
15 trying to figure out what's going on. So the  
16 respondent is actually -- expects you to have  
17 an accurate number of how many people are  
18 coming out on the street.

19 Now, he says a lot of people. So  
20 did Officer Copps. The bottom line here is  
21 chaos in the street. Now, that's the bottom  
22 line. No one expects you to know the doggone

1           -- no one expects you to know a number. Does  
2           that make any sense? So he wants you to  
3           count, like, somewhere that 120 people came  
4           from some other direction, went down into the  
5           street and then came running back out.  
6           There's no evidence that anyone from the  
7           Stadium or from any other place was down in  
8           that street. You can even look at the video  
9           tape. Did you see 120 people in the street?  
10          You didn't see that.

11                        And then we talk about the uniform  
12          closing time for the -- for the -- for the  
13          establishment. Again, there is no evidence  
14          that was ever put in front of the Board for  
15          anybody regarding a uniform closing time  
16          causing a rush on Adams Place. That was not  
17          part of the record, simple as that. So again,  
18          the only thing that is part of the record is  
19          that you got patrons come out of The Scene and  
20          they cause a disturbance in the street,  
21          especially after an incident of severity to  
22          the safety and health of the community had

1           occurred.

2                       Again, this happened. Five people  
3           got shot by people -- by what appears to be an  
4           incident that came from out of the  
5           establishment. That's what the evidence is  
6           consistent of. So instead of -- this is what  
7           we got. We have insults of Sergeant Rogers,  
8           calling him a bean counter. I mean, can you  
9           believe that? That we have Sergeant Rogers  
10          who kept accountability, who worked on the  
11          financial records of the establishment, who  
12          has apparently worked a deal. Now, again,  
13          he's working on a deal with the establishment  
14          that apparently doesn't know of any contract  
15          or any requirements. Now, that seems a bit  
16          implausible.

17                      He also told you that there was a  
18          dozen establishments that were involved, so  
19          there's -- no one's picking on this  
20          establishment. But the thing that's actually  
21          kind of crazy here for this service, that  
22          apparently in their closing argument, they say

1           it's an entitlement. Now, when did  
2           reimbursable details become a public  
3           entitlement by which taxpayers had to pay for?  
4           When did that ever happen? That's never been  
5           the case. You can look at that contract.  
6           Now, regardless of whether or not it's  
7           enforceable or not, we know that it's not some  
8           type of -- that's not a general patrol  
9           situation. So let's disregard this whole  
10          situation.

11                         But bottom line, is this caused by  
12          conspiracies? Is this caused by vendettas?  
13          It's caused because the general public is  
14          footing a bill for an establishment that  
15          hasn't paid for four or five months but  
16          instead wants to nickel and dime. What did  
17          they get? They got a few thousand dollars off  
18          the bill? But in reality, the requirements  
19          that's what's been paid in advance. So again,  
20          they did not -- the establishment did not do  
21          what it was supposed to do and never led --  
22          met up to responsibilities for to be a part of

1 the program. Even though it says it wants to  
2 be a part of the program, it didn't meet the  
3 responsibilities.

4 And then up here, of course,  
5 apparently where the Board has never said that  
6 anything regarding whether or not there's  
7 expectation of it, apparently that never  
8 happened, even though the -- it's here over  
9 and over again. I mean, in the end, I mean,  
10 what -- how does the Board handle this  
11 situation where, when you -- when an  
12 establishment's word is its bond and the  
13 relationship of the establishment to the Board  
14 is very important in terms of trust, how do  
15 you deal with that? When you do that and then  
16 you get evasion?

17 So and then again, in terms of this  
18 security plan, is there an altercation.  
19 Well, again, you can look at the evidence and  
20 answer for whether or not there's compliance.  
21 So at this point it seems that this  
22 establishment is completely grasping at straws

1 to make it seem as if that this is all --  
2 there was no altercation that occurred because  
3 when, you know, sometimes there's an  
4 altercation. Sometimes there's not an  
5 altercation. It all depends on what's  
6 convenient for them in terms of what developed  
7 afterwards.

8 And then they quote Lovell, which  
9 is a case that I'm -- was involved in. You  
10 can look at the course of conduct and make a  
11 conclusion of whether the course of conduct in  
12 operations of the establishment led to what  
13 occurred and what continues to have occurred  
14 over a period of time. You can certainly make  
15 a conclusion whether the establishment's  
16 failure to meet its responsibilities and have  
17 a detail is part of the course of conduct  
18 considering what has already been established  
19 as a need with this establishment.

20 So we're not asking for a  
21 legislation of emotions. That sounds kind of  
22 funny. We're asking for -- I mean, we're

1 asking for enforcement of safety against  
2 violent incidents. That's what -- that's the  
3 only thing the District has asked for.

4 Again, we have a situation where a  
5 service of the -- a very important service  
6 that's necessary has not been paid in full,  
7 where an establishment has been elusive in  
8 terms of knowing what is an expectation of  
9 that establishment. Then the Board, in  
10 looking at whether or not imminent danger  
11 exists, you have to answer this question --  
12 are you satisfied that based upon what you  
13 heard that danger has been abated.

14 I know for the District and what  
15 we've seen, the answer is probably no. So as  
16 a result, the District would ask for the  
17 suspension to remain in force indefinitely  
18 until a show cause proceeding has been  
19 completed.

20 CHAIRPERSON MILLER: Okay. So the  
21 record is now closed and the Board will  
22 consider this case in closed session and issue

1 a decision within 72 hours, pursuant to D.C.  
2 Code Section 25-826(b).

3 So we'll now take a vote on  
4 considering this in closed session -- we, the  
5 Board. As chairperson of the Alcoholic  
6 Beverage Control Board for the District of  
7 Columbia, in accordance with Section 405 of  
8 the Open Meetings Amendment Act of 2010, I  
9 move that the ABC Board hold a closed meeting  
10 for the purpose of seeking legal advice from  
11 our counsel on Case Number 14-251-00133, The  
12 Scene, per Section 405(b)(4) of the Open  
13 Meetings Amendment Act of 2010 and  
14 deliberating upon this case for the reasons  
15 cited in Section 405(b)(13) of the Open  
16 Meetings Amendment Act of 2010. Is there a  
17 second?

18 MEMBER SHORT: Second.

19 CHAIRPERSON MILLER: Mr. Short has  
20 seconded the motion. I'll now take a roll  
21 call vote now that the motion has been  
22 seconded. Mr. Brooks.

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

MEMBER BROOKS: I agree.

CHAIRPERSON MILLER: Ms. Miller  
agrees. Mr. Short.

MEMBER SHORT: I agree.

CHAIRPERSON MILLER: Okay. It  
appears that the motion has passed by a 3-0-0  
vote and I hereby give notice that the ABC  
Board will consider this case in closed  
session and it's your decision whether you  
think we need to go on.

MR. LeFANDE: We have no further  
business before the Board today. May we be  
excused?

CHAIRPERSON MILLER: Absolutely.

MR. LEFAND: Thank you.

MR. ADAMS: Thank you.

(Whereupon, the above-entitled  
hearing concluded at 8:26 p.m.)

<b>A</b>	356:10 360:4,5,19 385:20 396:15,20	410:12 418:15	110:16 111:1,8,11 111:15,18,22 120:12,17,20 121:2 124:4,21 125:1,18 127:15 135:21,22 136:3,5 146:16 155:12 157:7 171:2,2 177:3 179:5,22 180:2 182:10 183:4 186:4,8 194:14 195:2 196:18 200:22 206:6 213:21 216:10 219:15 224:2 227:10 229:1 231:10 233:17 237:22 243:21 247:8 251:22 253:14 258:10 263:13 266:20,22 271:18 274:14 276:5 277:12,17 281:13 281:16 286:8 287:15,18,22 288:10,14,17 289:6,16 292:2 294:18 297:5,10 297:12 298:6,8,19 300:11,14 301:9 303:7,11,18 304:16 305:5 306:1 307:21 308:11,14 309:13 309:22 312:11,12 314:2,11,16 315:9 316:19 317:1,4 320:15,21 323:2 327:2 331:9,12,19 331:22 332:7 333:10,13 334:1,4 334:10 340:10,16 341:7,9,17,22 344:12,18 346:4 347:10 348:16,19 348:21 350:7,15	350:22 351:7,11 351:17 353:14,19 355:4,7 359:12,13 360:14 362:15,21 362:22 364:5,7 367:2 377:7 391:21 395:15 398:20 399:15,17 399:20 400:1,4,6 400:17,18,22 402:3,11,17 404:5 404:12,14 405:10 405:13,19 406:18 406:19,21 407:1 408:6 416:2,7,19 417:1 419:6,8 420:4 425:1 427:9 448:2,7,10 453:16 460:16
<b>\$1,200</b> 242:15 245:14	<b>ABRA's</b> 306:21	<b>acquire</b> 310:2	<b>add</b> 452:10	
<b>\$14,152.88</b> 348:8 349:1	<b>absence</b> 280:3	<b>acquired</b> 309:16	<b>addition</b> 93:3 237:12	
<b>\$14,487.20</b> 256:7	<b>absent</b> 223:6 282:10	<b>acronym</b> 6:13 203:16	<b>additional</b> 153:7 199:15 232:12 237:6 248:17 395:6 416:17	
<b>\$15,155.84</b> 209:13	<b>absolutely</b> 288:13 307:9 313:15	<b>acronyms</b> 6:21	<b>address</b> 194:18 222:11 287:5 292:19 350:9 351:19 353:20 394:13 422:8,10 423:19 441:8	
<b>\$152.88</b> 348:10	425:15 436:1	<b>act</b> 177:8 428:22 438:19 459:8,13 459:16	<b>addressed</b> 221:10 221:11 222:12 226:10 232:15 234:16 240:10,11 246:11 248:11 259:19 289:20,21 307:7 353:21 437:1	
<b>\$24,000</b> 431:4	460:14	<b>acted</b> 111:6	<b>adequate</b> 200:4 442:21	
<b>\$40,000</b> 306:6,6	<b>access</b> 37:4 155:8 190:10 394:2	<b>acting</b> 102:9 385:3	<b>adjacent</b> 133:17	
<b>\$400</b> 188:18	<b>accident</b> 72:18 100:11 118:11	<b>action</b> 161:18 162:12 304:8 355:15	<b>adjusted</b> 236:9,17	
<b>\$6,463.52</b> 256:11 345:9 349:5	119:17 120:8	<b>actions</b> 13:9 164:13 175:13 177:14 258:14 330:4,6,10 330:11 421:12		
<b>\$6,797.84</b> 242:9	141:20 176:22 362:6	<b>activity</b> 255:11,11 255:13,14 268:19 426:12		
<b>\$7,132</b> 345:5	<b>accompanied</b> 313:3 313:19 438:21	<b>acts</b> 340:5,11 375:4		
<b>\$7,132.16</b> 256:14	<b>accord</b> 107:21 201:5 431:6	<b>actual</b> 62:9 87:2 94:22 271:10 356:10 431:15		
<b>\$7,689</b> 230:2	<b>account</b> 152:8 240:19,22 256:8 348:15,16 381:13	94:22 271:10 356:10 431:15		
<b>\$7,689.36</b> 218:1 225:12 236:10 347:15,18 348:5 349:6	<b>accountability</b> 407:19 431:9 454:10	<b>Adam</b> 9:8		
<b>\$8,023</b> 347:12	<b>accounting</b> 160:7 277:19 339:22	<b>Adam's</b> 365:14,15 366:4,7,15 373:22 374:1 376:6,9 377:1,3		
<b>\$8,023.68</b> 242:9 262:1	<b>accuracy</b> 262:3 272:19	<b>Adams</b> 1:7 2:6,7 3:6,10,12 8:16,21 9:2,3,6,8 13:18,20 13:21 14:1,1,4 18:5 21:11,11 25:4 28:19 29:11 31:3,11 33:21 34:2,15 36:2,9 37:6,12 38:7 39:9 47:14,15 48:21 49:6,18 54:1,6,10 60:5 66:18 77:8 79:3,9,12 81:5 83:8,21 84:7,9,14 85:20 86:2,4 87:14 88:4 95:7 101:20 102:11		
<b>a.m</b> 1:16 3:2 10:18 71:6,7 175:7,15 235:10 327:16 328:8 385:9 417:13 428:14	<b>accurate</b> 213:13 216:1 452:17			
<b>AA</b> 273:1 274:11 274:12,16,19	<b>accurately</b> 57:8 219:5 223:9,14 227:1 228:15 230:22 233:8 237:12 243:14 246:21 251:13 253:6 257:17 263:4 274:6			
<b>abated</b> 458:13	<b>acknowledge</b> 53:3 408:19 410:19			
<b>ABC</b> 334:14 459:9 460:7	<b>acknowledged</b> 408:19 410:19			
<b>ability</b> 420:19	<b>acknowledging</b> 182:22 411:17			
<b>able</b> 12:1 85:6 119:5 198:9,16 199:20 292:12 293:1 351:3 394:22 420:22	<b>acknowledgment</b>			
<b>above-entitled</b> 1:15 88:15 239:1 308:6 460:17				
<b>ABRA</b> 1:13 197:20 197:21 199:21 201:9,22 204:5 220:18 240:21				

242:8	<b>agency</b> 232:20	435:3,6 436:3	271:10 278:2	353:7 358:7 364:6
<b>Administration</b> 1:3	<b>agenda</b> 158:5	438:9	281:22 282:1,12	395:18
1:16 439:14	<b>ages</b> 387:16,18	<b>allegations</b> 303:3	282:14 345:9	<b>apparently</b> 104:16
<b>administration's</b>	<b>aggravated</b> 436:21	438:14	346:14 348:5	219:18 258:16
442:12	<b>aggressive</b> 181:7	<b>allege</b> 291:14	352:13 358:12	450:14 454:12,14
<b>administrative</b>	181:13 363:5,6	<b>alley</b> 68:15 79:8,15	359:1,2 385:14	454:22 456:5,7
177:8 298:14	371:16	144:5	413:21 416:18	<b>apparently)thro...</b>
303:21 313:1	<b>aggressively</b> 361:3	<b>alleys</b> 155:3	424:2 433:1 447:4	383:4
408:20 413:9	<b>aggressor</b> 163:9	<b>alleyway</b> 8:12,15	451:13	<b>Appeals</b> 437:5
438:19	<b>agitated</b> 12:6 62:15	58:11 86:13	<b>amounts</b> 347:22	445:5
<b>admit</b> 260:15	<b>ago</b> 103:6,7,14	133:15,17 366:8	348:1 404:7 433:4	<b>appear</b> 12:6,8,10
301:13	205:13 256:1	<b>allies</b> 418:20	<b>analysis</b> 67:9	15:14 22:5,7 24:2
<b>admitted</b> 213:20	303:8 310:5	<b>allow</b> 82:18 95:11	420:14	26:6,7 105:22
214:1 216:8,12	357:12,14	105:12 285:16	<b>ANC</b> 336:10,11	107:7 110:4,9,12
220:2 224:4	<b>agree</b> 300:19	315:4 369:21	367:11,13	166:4,15 168:5,16
227:12 229:3	321:12 354:14	410:21	<b>ANC-5C</b> 3:7	171:16 181:6
231:13 233:19	390:7 460:1,4	<b>allowed</b> 17:4,5 29:3	<b>ANCs</b> 439:6	182:17,21 199:22
238:2 244:1	<b>agreement</b> 333:16	65:13 81:18 109:8	<b>and/or</b> 351:20	203:22 210:3
247:10 252:2	334:15 336:21	131:15 170:7,13	<b>angle</b> 365:8	215:22 219:4
253:16 263:15	337:7,14,19 338:7	174:2 298:14	<b>angry</b> 297:22	280:6
267:2 271:20	338:8 390:7 397:6	390:10 411:3	<b>ankle</b> 193:20	<b>appeared</b> 15:20
274:17 276:7	397:9,12 411:6	<b>allowing</b> 18:9	<b>anniversary</b> 102:17	37:18 40:1 363:6
282:9	432:9 439:10,12	430:5	<b>announcing</b> 239:11	418:1,1 419:7
<b>advance</b> 259:4	439:21 440:1,3,7	<b>alpha</b> 208:6	<b>answer</b> 29:3,21	<b>appearing</b> 277:8
282:4 306:3 342:7	<b>agreements</b> 439:21	<b>altercation</b> 100:3	54:5 67:1 95:11	<b>appears</b> 8:12
342:8 343:4,5,17	<b>agrees</b> 304:16	144:14 161:8,13	102:22 117:12	213:13 224:20
343:19 410:18	460:3	178:22 364:20	120:21 121:3	423:5 454:3 460:6
412:8 455:19	<b>ahead</b> 72:9 77:10	373:2 387:12	124:5 127:21,22	<b>applied</b> 188:15
<b>adversarial</b> 15:15	179:9 195:12	419:4,8 438:1	128:7 178:9 195:6	<b>apply</b> 187:9 346:20
<b>advice</b> 459:10	207:21 297:8,14	456:18 457:2,4,5	284:6 319:1	<b>appreciate</b> 244:22
<b>advise</b> 218:5	318:22 327:5	<b>altercations</b> 202:14	322:11 333:22	298:15 323:14
225:16	328:1 329:6	436:4,11	341:20 349:13	<b>approach</b> 84:3
<b>advised</b> 242:22	338:12 346:2	<b>altogether</b> 449:8	456:20 458:11,15	207:18 214:8
<b>affairs</b> 7:2 60:22	393:5 402:10	<b>ambulance</b> 13:2	<b>answered</b> 57:5	216:17 220:7
280:1 294:14,20	<b>aid</b> 7:11 41:1	106:6 166:22	225:19 322:10	224:9 227:17
295:1 296:6,18	186:15 187:11	<b>ambulances</b> 62:4	338:3	229:8 231:18
357:2 377:9,18	189:4	<b>Amendment</b>	<b>answers</b> 351:4	234:7 239:16
429:15,16	<b>ain't</b> 18:12 40:8	425:14 459:8,13	<b>anticipate</b> 155:17	244:5 247:14
<b>affirmative</b> 76:7	<b>air</b> 68:12 181:15	459:16	<b>anybody</b> 40:6 44:3	249:18 252:6
225:19	<b>Al's</b> 85:1	<b>amicable</b> 183:7	131:11 135:10	253:20 254:20
<b>afield</b> 283:22	<b>ALBERTI</b> 1:19	<b>amount</b> 141:9	156:6 453:15	255:15 256:20
<b>afternoon</b> 60:15,17	239:14 270:7	212:14 218:1	<b>anytime</b> 12:20 13:1	261:4 262:6
89:3 146:20	<b>Alcoholic</b> 1:3,16	232:8,11 236:10	<b>anyway</b> 270:13	263:19 264:19
158:10,16,17	439:13 459:5	237:3 256:4,16	<b>apologize</b> 56:2 82:5	267:7,21 269:3
217:19,21 225:9	<b>aliens</b> 430:19	261:21 262:14	288:10,14,19	270:15 272:4
226:16 308:16	<b>alive</b> 121:14	268:11 269:13,17	316:10 325:17	273:7 274:21
382:5	<b>allegation</b> 434:13	269:20 270:1,9,12	336:18 349:12	288:2 299:20

320:17 362:7,8	180:7,19 181:4	45:11,12,13 56:22	189:14 200:18	425:16 426:10
<b>approached</b> 16:21	182:10 184:9	82:4 120:22	<b>associate</b> 297:21	438:15 441:18
171:18 196:10	190:2 285:17	125:21 127:18	<b>assume</b> 324:5	450:17
<b>approaching</b>	302:14 368:17	136:6 156:22	<b>assumed</b> 186:3	<b>attorneys</b> 380:16
265:13 272:21	370:2 416:11	164:14 166:19,22	200:6 373:9	<b>attributed</b> 280:16
323:16	429:7,10 433:22	173:19 176:17	<b>assumption</b> 180:11	<b>audiovisual</b> 202:18
<b>appropriate</b> 82:14	<b>areas</b> 416:11	188:21 189:13	373:12	203:9,22
124:11 312:3,18	<b>argue</b> 104:21	193:4 196:22	<b>assure</b> 409:5	<b>authority</b> 81:3 83:1
436:13	105:20 110:7	197:6 200:6,7	<b>atmosphere</b> 384:6	397:8
<b>appropriately</b>	312:4 313:10	215:11 225:6,8	391:16	<b>authorization</b>
111:6 437:2 438:7	<b>argued</b> 300:16	226:3 250:10	<b>attached</b> 208:16	278:16
<b>approved</b> 440:8	303:8 313:9	309:8 314:4 315:5	218:6 219:19	<b>available</b> 398:5,6
<b>approves</b> 440:4	<b>arguing</b> 20:4,13,19	322:10 325:5	<b>attempt</b> 64:5 191:7	<b>availing</b> 379:3
<b>approximate</b>	25:18 30:2,3	338:2 356:18	452:10	<b>Avenue</b> 50:8 155:7
273:17	62:19 107:15	404:6 418:7	<b>attempted</b> 56:12	209:18 394:1
<b>approximately</b>	166:9 312:10	425:19 435:1	64:4 296:12	411:19
16:19,20 159:15	344:10 372:6	458:3	<b>attempting</b> 64:6,12	<b>awaiting</b> 236:12
175:6,15 182:12	<b>argument</b> 2:7 15:6	<b>asking</b> 22:16 43:4	428:21	237:6
190:12 194:1	23:20 58:10 72:3	53:21 57:2 121:3	<b>attend</b> 41:2 43:8	<b>aware</b> 62:7 140:18
199:12 205:12	287:3,13 315:2	128:6 187:3 189:9	<b>attendance</b> 245:1	146:8 342:5
235:10 310:7	344:12 400:7	244:14,18 249:7	310:22 351:19	349:21 350:9,17
357:11,13 364:4	406:22 409:13	292:20 328:17	<b>attended</b> 132:14,18	351:18 359:15
365:22 371:19	424:17,19 425:2	331:6 350:15	310:16	<b>awareness</b> 314:4
372:19 374:12,18	436:9 447:14,17	351:4 354:2,20	<b>attending</b> 43:15	351:7,12 412:4
375:6 385:11	448:4,9,19 449:5	355:3 425:3	100:18 367:11	<b>awhile</b> 49:22
387:2 403:5	450:19 454:22	432:15 457:20,22	<b>attention</b> 7:20 9:14	
417:13	<b>argumentative</b>	458:1	9:17 16:5 22:15	
<b>April</b> 206:14,17	18:19 168:10	<b>asks</b> 425:16	23:1,19 60:1 98:5	<b>B</b>
207:14 221:22	<b>arguments</b> 303:12	<b>assault</b> 147:19,21	103:18 147:13	<b>B</b> 2:10 216:8,9,13
222:5 223:15	406:18 407:10	148:3,4,6 445:2	156:16 160:21	<b>back</b> 20:3,3,4 23:2
243:15 244:17	449:15	<b>assaulted</b> 148:2	161:1 175:13	32:9,13 34:17
246:8,18 247:1	<b>arm</b> 142:6,8	<b>assaultive</b> 168:14	192:5 209:3 217:5	36:6 53:8,10
248:8 249:12	<b>armed</b> 61:2,8 191:1	437:20	221:4 224:19	62:15,17 63:6
251:9,15 252:19	191:2	<b>assaults</b> 304:4	229:17 230:3,8	64:12 69:10 77:18
253:2,4 265:9	<b>arms</b> 33:13,14	<b>assembly</b> 426:2	241:11 248:2	78:1,19 79:5,6,7
266:1	<b>arrhythmic</b> 139:18	<b>assert</b> 286:22	259:5 268:10,18	86:6,21 87:2
<b>area</b> 21:1 27:11,16	<b>arrived</b> 134:15	<b>asserted</b> 177:20	269:2,19 277:10	103:18 105:13
27:21 28:8,8	<b>artists</b> 368:21	447:14	379:6 415:12	108:22 109:8
31:13 35:10 77:19	<b>ASAP</b> 211:5,8	<b>assertion</b> 319:12	416:18	112:19 114:7,17
78:11,12 87:7,12	<b>ascertain</b> 140:8	<b>assess</b> 444:22	<b>attentive</b> 23:8 25:7	114:19,20 115:6
113:21 127:14,19	<b>ascertaining</b>	<b>assignment</b> 8:6	<b>attorney</b> 29:1 76:7	115:14 116:16,17
128:9,19 130:2	141:19	<b>assist</b> 189:12 191:7	112:3 304:1 307:5	116:18 127:13
131:16 139:13,14	<b>ascribe</b> 313:16,21	<b>assistance</b> 44:4	312:6 322:8 331:5	128:18 131:19,21
140:7,10 143:12	<b>ascribed</b> 304:10	149:18 204:1	335:12 338:1	132:2,10 134:3
153:14 154:3	<b>aside</b> 92:15 263:2	215:21 218:8	341:4 344:8	139:15 145:8
161:16 166:1	<b>asked</b> 13:5 16:7	244:22 246:6	353:11 380:18	153:15 157:8,9
169:13 171:5,8	29:2 41:1 43:20	<b>assisted</b> 85:16	400:3 401:14	158:2,5 165:1
				167:9 170:7,9,11

170:14 171:2	282:8,9 283:2,14	203:14 430:13	336:6 339:9,11,13	411:2 412:2
173:20 174:2,14	285:3 303:18	<b>best</b> 94:13 156:16	345:2 410:20	413:10,18 414:2,5
177:20 186:17	328:13,15 336:9	318:14	422:3	414:12 415:11
193:16 197:17	358:20 364:18	<b>better</b> 202:22	<b>blame</b> 286:20	416:16 417:7
201:7,16 251:7	373:1,15 400:13	330:22 331:7,13	<b>blamed</b> 120:11	418:22 419:1,5,13
303:12 306:1	422:7,8,18 423:20	332:1,5,6	<b>bleeding</b> 12:13	420:13 421:3
308:10 326:8	424:11,12 449:6	<b>Beverage</b> 1:3,16	36:5 38:4 187:2	422:12 423:4,16
340:2 346:11	458:12	439:14 459:6	193:19	424:9 425:19,22
352:20,21 363:15	<b>bases</b> 240:15	<b>beyond</b> 81:5 185:5	<b>block</b> 373:1 374:13	427:2 439:4,16,20
366:8 382:12	<b>basic</b> 284:5 450:3	258:12 295:20	<b>blocked</b> 33:2,15	440:4,8,9 441:16
383:14,18 400:10	<b>basically</b> 27:3 33:7	<b>big</b> 14:5 102:18	<b>blocking</b> 33:14	442:11 445:22
405:17 406:14,17	91:13 202:14	176:20 183:4	34:13,20 45:7	447:21 448:8
414:20 453:5	<b>basis</b> 63:11 293:4	284:17 370:2	70:19	449:19,21 450:4,5
<b>backing</b> 99:17	335:4,6,8,8,22	428:20	<b>blue</b> 388:16	453:14 456:5,10
<b>Backyard</b> 390:5,16	354:5 423:1	<b>bill</b> 212:14 242:1	<b>board</b> 1:3,17 3:11	456:13 458:9,21
390:17,18 391:4	<b>BB</b> 273:9 274:6,11	270:12 271:6,7	6:12 60:8,11,12	459:5,6,9 460:8
391:11	274:13,16,19	455:14,18	60:13 62:8,19	460:12
<b>bad</b> 297:12	<b>bean</b> 429:14 430:3	<b>billed</b> 212:3,6	76:1 81:9 125:7	<b>Board's</b> 81:6 88:11
<b>badger</b> 322:9 338:2	454:8	241:12,17 243:10	125:10,10,11,14	263:3 272:3
<b>badgering</b> 331:5	<b>beats</b> 434:5	268:20 269:6,13	128:9 136:8	304:14 364:5
338:5	<b>becoming</b> 446:17	269:17,20 270:1	146:19 155:10	403:22 404:2
<b>bag</b> 132:12	<b>began</b> 183:22	282:14	156:21 178:3	423:15
<b>balance</b> 223:2	<b>beginning</b> 96:11	<b>billing</b> 259:12,15	230:4 238:10	<b>Boardroom</b> 308:3
230:14,15 236:4	113:1 145:9	259:15 280:4	247:21 279:10	<b>body</b> 12:16 33:16
240:19,19 256:9	416:13	338:18	280:9,18 281:19	91:14 92:7
348:17 358:2,5	<b>begins</b> 97:3,3 445:6	<b>bit</b> 10:17 20:19	282:3,13 284:3	<b>bond</b> 456:12
<b>balances</b> 246:3	<b>behalf</b> 3:18 396:22	31:4 99:18 114:19	286:15 289:18	<b>bookkeeping</b> 431:8
<b>bald</b> 43:17 48:10	<b>behave</b> 424:12	115:17 118:10	292:4 298:13	<b>borne</b> 432:4
<b>ballpark</b> 71:15	425:17	119:14 137:19	300:17,17 302:5	<b>bothered</b> 116:13
380:2	<b>behaving</b> 58:6	139:12 142:15	302:11 303:9,20	<b>bottom</b> 55:8 208:21
<b>band</b> 136:15 319:6	<b>behavior</b> 76:19	342:1 352:21	304:18 305:22	209:4 224:20
388:18,19 390:5	<b>belief</b> 410:3	378:15 411:21	306:9,14 310:12	229:18 240:3
390:15	<b>believe</b> 22:21 74:9	454:15	310:21 311:6,9	246:1 283:9,22
<b>bandage</b> 188:15	81:8 82:9 111:19	<b>Bladensburg</b> 155:7	312:16 313:2,16	304:20 412:13
189:10	124:10 146:15	<b>blades</b> 92:13,16	313:22 316:12	435:10 452:20,21
<b>bands</b> 388:17 391:1	158:7 179:6	<b>Blakeney</b> 2:4 3:22	317:22 318:6,7,20	455:11
<b>bank</b> 346:9	245:17 246:16,18	55:11,13 158:14	319:11,11 320:6	<b>Boys</b> 319:7
<b>bar</b> 3:18 389:18,21	295:18 314:6	158:17,19 159:6	320:13 321:5	<b>braced</b> 193:15
<b>bars</b> 176:4	389:9 396:7	177:20 217:20	322:21 323:18	<b>Branch</b> 7:2,15
<b>bartending</b> 147:16	405:15 406:3	225:9 232:14	324:9,18 327:9,18	<b>break</b> 150:4 154:3
<b>based</b> 19:19 52:14	411:22 418:17	233:7 235:18	328:10,14,21,21	156:15 238:8,22
63:1 66:20 126:4	424:3 454:9	236:13 240:14	330:9 331:16	308:4 406:12
137:10 138:15	<b>believed</b> 119:22	242:12 246:7	353:21 354:4	<b>breaking</b> 22:2
140:15 143:3	246:9	249:1 251:5	367:4 378:17	150:5
145:19 146:4	<b>bench</b> 156:21	292:14 308:15	395:12,17 400:14	<b>brewing</b> 118:11
177:15 241:9	<b>benefit</b> 6:11,19	323:22 328:12	404:4,6 405:1	149:15
242:13 281:17	100:9 128:8	333:4,14 335:15	407:13 408:18	<b>bridge</b> 280:15

368:17 403:8,12	432:4 433:14	454:8	<b>careful</b> 435:14	<b>causing</b> 57:16,17
<b>brief</b> 161:7	<b>Bureau</b> 411:16	<b>calls</b> 4:10 66:13	<b>Carl</b> 2:3 4:11,21	58:5 453:16
<b>briefcase</b> 405:9	<b>bury</b> 388:6	89:1 120:21 124:5	5:7 441:1,19	<b>cautious</b> 115:17
<b>briefly</b> 76:2 88:16	<b>bus</b> 123:22	124:6 386:1	442:14	<b>Caveness</b> 435:12
95:11 96:6 105:10	<b>buses</b> 144:4 184:11	<b>calm</b> 11:19 18:22	<b>carry</b> 206:4	<b>cavity</b> 92:7
119:7 198:22	<b>business</b> 58:4 70:7	20:15 38:17 61:16	<b>cars</b> 29:20 62:4	<b>CC</b> 2:18 275:2
291:7 381:8	91:18 92:1 199:17	61:20 75:15	138:10 189:2	276:2,4,7,10
<b>bring</b> 10:4 53:4	209:16 276:15	104:18,19 105:18	192:9 193:14	403:20 404:3
60:2 70:8 98:16	365:5,7,9,11,13	107:12,13 124:1	280:20 369:14,16	<b>cc'd</b> 244:12
98:21 154:2,4	365:18,20,21	126:9,12 180:9	397:21,22 398:3	<b>cc'ed</b> 218:21
416:10 422:12	366:4,8,14,19	181:16 383:6	398:16 399:6,8	220:17 222:13
431:5	372:14 375:5	443:12	446:18,19	232:19,20
<b>bringing</b> 20:9 23:5	430:10 432:1,2,7	<b>calmed</b> 20:20	<b>cart</b> 192:7	<b>ceased</b> 371:6
55:7 92:9 98:14	460:12	<b>calming</b> 30:3 58:17	<b>case</b> 1:10 3:5 4:8	<b>cell</b> 211:12
368:21	<b>businesses</b> 200:21	<b>camera</b> 324:5	52:10 111:4	<b>center</b> 87:6
<b>broad</b> 53:19 283:18	368:18 375:5	326:11,13 327:9	186:15 239:12,12	<b>cents</b> 345:6,7
<b>broke</b> 373:3 384:2	<b>busy</b> 427:22	327:11 365:7,17	258:14,18 278:1	<b>certain</b> 59:16 64:14
<b>Brooks</b> 1:20 459:22	<b>buy</b> 369:20	<b>cameras</b> 199:2,4,5	289:13 300:15	94:21 151:19,20
460:1		199:7,14,16	303:14 305:13	151:20 280:3
<b>brother</b> 106:20	<b>C</b>	200:16 203:19	317:4 353:7,9,12	281:21 283:10
109:2,3,4 162:22	<b>C</b> 2:10 219:10,12	327:10 395:6	355:9,13,13,20,21	343:7 412:13
164:20 167:5,8,17	220:2,3	<b>Campbell</b> 217:10	378:1,16,18 379:2	425:17 426:11
168:3 169:21	<b>calculation</b> 241:8	217:11,15 218:16	379:11 380:4	449:10 450:15,16
170:3,5 371:22	242:5,11,13	225:7,8 226:14	382:9 398:2 400:8	<b>certainly</b> 177:8,16
<b>brought</b> 10:6 52:6	<b>call</b> 3:4 4:14 12:21	<b>cancellation</b> 415:20	402:20 406:4,5	298:15 302:9,10
59:18 61:13 62:10	13:5,10 19:17	<b>cancelling</b> 343:16	407:21 429:12	410:1 415:1
62:14 64:9,11	22:21 24:18 26:13	<b>Candice</b> 316:17	448:12,13 450:6	441:18 457:14
73:6 98:14 99:1,5	30:17 39:4,6,17	<b>Cans</b> 93:1	455:5 457:9	<b>certifications</b> 6:5
99:15 103:19	57:4,6,20,21	<b>capability</b> 199:14	458:22 459:11,14	<b>certified</b> 80:7
104:3,4 150:14	88:21 106:3,5	<b>capacity</b> 72:12	460:8	187:15 232:7
175:12 203:10	107:4 112:11,14	146:8,10,13,14	<b>cases</b> 379:16 386:2	236:11,22 257:15
259:6 440:17	125:19 126:6	396:21 397:3	408:22	258:7 265:19
448:22	131:22 147:9	<b>capture</b> 440:22	<b>cashier's</b> 218:7	271:1 274:3,6
<b>brown</b> 39:13	148:12 150:6	<b>car</b> 27:6,7,16 68:14	219:20 346:12	<b>chain</b> 247:22
<b>brown-skin</b> 35:22	158:12 168:22	72:17 100:10	<b>caters</b> 441:14	<b>Chair</b> 3:17 88:19
<b>brown-skinned</b>	326:21 342:18	103:15 119:16	<b>cattle</b> 113:8,10	158:11 213:17
37:18 40:1 43:17	428:17 446:1	120:1 124:15	<b>caught</b> 68:14	216:5 219:8,16
48:11	459:21	133:16 369:15	288:18	223:17 227:5
<b>bubble</b> 428:20	<b>called</b> 4:22 89:6	373:19 382:20	<b>cause</b> 10:9 65:10	228:18 231:5
434:17	108:2 147:11,16	384:20 398:18	75:15 383:7	233:4,12 237:17
<b>buddies</b> 173:6	147:17 158:20	399:9 435:10,13	453:20 458:18	239:15 243:17
<b>buffet</b> 391:7	166:19,22 390:4	<b>card</b> 202:16	<b>caused</b> 16:3 80:5	247:3,15 251:18
<b>building</b> 1:13 37:1	443:10	<b>care</b> 42:22 211:5	80:22 119:16	253:9 257:20
37:2 65:14 77:7	<b>calling</b> 9:14 57:12	392:19 442:6,11	164:12 170:17	266:12 271:12
77:13 78:6 185:8	150:5 156:6 169:8	443:4 452:2	174:1 188:18	274:9 299:21
395:6	217:5 230:3	<b>cared</b> 442:2	362:6 384:21	315:6 375:11
<b>burden</b> 426:8,9	239:12 268:10	<b>career</b> 91:8,17	455:11,12,13	391:18 395:10

<b>Chairman</b> 3:11 407:1	243:22 244:6 247:9,16 249:20 252:1,8 253:15,22 255:16 256:21 260:8,11,14,17 261:1,3,6 262:8 263:14,21 264:21 266:18,21 267:1,9 267:22 269:4 270:16 271:19 272:5 274:15,22 276:6 277:13 281:15 284:1 285:8,13 286:2 287:2,8,11,14,16 288:4,21 289:3,22 290:3,7,9,12,16 292:10,21 293:7 293:12 295:3,9,15 295:19,22 297:7 297:11 298:10,21 299:22 300:13,19 301:2,11,17,21 302:6,13,18,21 303:10,17 305:4,8 306:15 307:11,13 307:16,19,22 308:9,12 309:10 309:14,21 310:1 311:19 312:8,21 313:4,8 314:10,14 315:1,7 316:16,22 317:3,6 320:22 321:19 323:4 327:22 329:5 331:6,11,17,20 332:4,13,17 333:7 333:11,21 334:2 335:17 336:4,8 338:4,11 340:8 341:5,8,15,19 344:16 346:1 350:5 351:9,15 354:13,21 360:9 362:18 367:4,7,14 367:17,20 368:9 368:22 369:5	370:3,7,16 371:1 371:4,8,14,20 372:2,5,9,15 373:11,21 374:3,8 374:15,19 375:2,9 375:17,20 376:1,4 376:10,15,22 377:5,12,15,19,21 378:4,7,9 379:22 380:6,20 381:1,5 381:7,11,14,18,21 382:2 391:19 392:4,7,20 393:2 393:11,14 394:10 394:15,18 395:11 395:16,19 398:22 399:16,19,21 400:2,5,12,16,20 401:21 402:2,7,16 404:10,13 405:12 405:14,21 406:6 406:10,16,20 424:16 429:1 443:17,21 444:2,6 444:10 448:1,6 458:20 459:5,19 460:2,5,14	65:19 <b>Chapel</b> 31:15 32:11 32:12,13 68:13 133:14 155:6 182:15 183:5 184:1 190:17,19 194:4,5,7,11 195:5,15 280:15 365:3 372:21 373:5 374:2,14 376:8,21 377:4 403:9,12 419:16 <b>characterization</b> 440:15 <b>characterizations</b> 110:21 344:14 <b>characterize</b> 139:15 389:15 <b>characterized</b> 102:12 401:15 <b>characterizing</b> 110:17 194:16,22 437:18 <b>charge</b> 352:4 <b>chased</b> 22:20 <b>chasing</b> 21:13,15 22:4 <b>check</b> 8:8 55:5 85:6 218:7 219:20 230:1 232:7 242:10 248:16 257:15 258:7 265:19 266:3 271:1 274:3,6 346:5,12 377:6 393:21 405:3 444:11 <b>checked</b> 133:15,17 <b>checks</b> 404:22 405:4 <b>chief</b> 1:8 77:4 79:17 207:8 209:10,17 214:18 215:4 217:12 218:5 221:18 222:18 225:15 226:1,17 232:10 235:21	236:10 237:7 240:18 241:1,22 242:22 259:9,21 260:6 275:11 280:10,13 286:18 300:9 304:10 345:18 407:22 431:3,18 435:1 438:14 <b>chip</b> 445:6 <b>chronological</b> 161:5 <b>circuit</b> 390:9 <b>circumstances</b> 202:7 <b>cited</b> 459:15 <b>citizens</b> 439:6 <b>city</b> 428:12 <b>civil</b> 177:10 279:21 285:11 289:12,17 330:5 355:15 356:4,15 377:11 <b>claim</b> 291:8,20 424:20 <b>claims</b> 279:21 293:4,18 294:7 296:6 <b>clarification</b> 60:20 75:5 83:15 84:2 295:10,11 <b>clarified</b> 76:9 <b>clarify</b> 8:12 55:17 80:6,21 <b>clarifying</b> 74:12 <b>cleaning</b> 192:16 <b>clear</b> 97:8 313:18 323:2 371:11 393:8,12,15 408:2 408:3 417:3 433:1 <b>cleared</b> 27:4 <b>clearer</b> 309:20 378:17 <b>clearly</b> 12:2 <b>client</b> 280:4 <b>client's</b> 285:22 <b>close</b> 9:1 12:4 24:8 26:1,3 27:5 29:19
-------------------------------	--	--	---	--

38:2 130:6 163:13 171:20 175:6 180:10 194:6,10 195:4 209:16 222:21 246:3 305:11,20 345:19 365:20 385:9,19 389:18,20 406:4 408:6 428:13,13 434:21 <b>closed</b> 36:17 48:3 241:16,21 243:11 425:6 428:17 458:21,22 459:4,9 460:8 <b>closer</b> 8:20,21 162:4 195:14 254:15 374:2 418:3,5 419:16 <b>closest</b> 9:6 <b>closing</b> 2:6,6 13:15 138:21 157:12,17 163:13 180:10 245:22 287:3,13 307:7 313:10 385:7 406:7,17,22 424:17 428:10,17 448:4,19 449:5 453:12,15 454:22 <b>closure</b> 1:8 258:17 300:8,14 323:9 343:14 401:3,7,15 401:17 403:3 408:1,21 415:9 <b>closures</b> 414:6 <b>clothing</b> 101:2,4 427:4 <b>club</b> 9:20 13:22 15:19 16:12 17:4 17:17 20:6,6 26:20 27:3 31:13 32:8,9 34:4,14,18 38:12 41:8 45:17 48:3 57:15,16 58:2 64:16,16,20 64:20 65:10,11 66:8 72:14 73:8	73:12 75:14 76:20 78:14,16 81:4 96:14,15 97:5,7 97:11 98:9 104:2 105:13 107:18 108:22 113:3,19 114:20 115:21 116:1,22 117:1 119:13,19,20 121:18,21 126:19 127:7,9,10 131:15 132:2,5 133:18 134:16,17,19,22 135:15 139:2,3 141:20 146:21 148:14 149:5,21 150:1,1,15 153:15 153:16 155:8 163:14 165:22 172:15,17,21 174:19,21,21 175:9 184:22 189:18 194:21 197:4,8 291:11 311:2 334:20 363:7 384:5 428:12,13 435:7 436:4,11 438:10 438:13 <b>club's</b> 83:9 <b>clubs</b> 206:7 <b>clue</b> 341:3 <b>co-counsel</b> 3:14,22 <b>code</b> 387:4 438:18 459:2 <b>cognizance</b> 251:10 <b>collaborate</b> 62:12 <b>collect</b> 11:19 <b>collected</b> 61:17,21 75:15 383:6 443:12 <b>Columbia</b> 1:1,16 3:12,18 5:9 177:12 191:20 278:13,17 312:19 354:1,2,7 378:20 379:1 404:8	412:13,14 437:4 438:18 439:3,11 440:9 445:3 451:5 459:7 <b>Columbia's</b> 294:13 <b>column</b> 255:14 <b>combating</b> 444:17 <b>combative</b> 12:8 28:17,20 168:12 437:20 <b>come</b> 9:20 13:4,21 16:12 18:1,2 19:2 23:11,14 24:7 25:7 28:4 34:1,2,4 38:3 39:11 44:6,7 47:1,21 48:13 50:22 51:3,9,11 52:1 56:13,20 58:9 62:15 64:12 64:15,16,20 65:2 65:15 100:21 105:12 121:7 127:10 157:9 160:20 162:15 163:1 164:9 165:1 166:18,21 168:21 169:6 170:16 171:4 173:20 176:12 201:13 202:1,19 203:1 204:9 264:16 265:10 268:3 272:18 273:12 277:9 278:5 293:15 294:1 296:3 297:14,19 298:2 299:1,6 369:15 391:8,10 405:17 414:5 415:18 422:9 426:2 428:7 449:19,21 453:19 <b>comes</b> 76:19 343:13 370:13 399:17 412:18 414:10 450:2 <b>comfort</b> 193:17,18	<b>coming</b> 14:22 15:2 16:15 17:16 18:4 20:11,12,21,22 21:1,2 24:21 25:9 25:16 31:10,12,19 32:8,15,17 34:17 35:9 36:9 37:6,12 37:17,22 38:1,5 41:6,7,9,21,22 46:17 57:19 64:17 64:19 67:20 68:13 70:20 72:7,10,16 126:16 129:22 130:1 132:11 134:3 144:11,16 157:8 161:15,20 164:21 186:4,17 195:19 197:9 234:3 419:19 427:12 431:2 451:11 452:18 <b>commander</b> 431:16 446:2 <b>commemorating</b> 103:2 <b>comment</b> 385:22 <b>commentary</b> 344:9 <b>comments</b> 283:21 <b>commercial</b> 368:18 433:22 <b>commissioner</b> 336:10 <b>commitment</b> 325:18,21 327:14 328:5 <b>commitments</b> 321:11,12 <b>common</b> 70:12 <b>commotion</b> 64:19 418:10 <b>commotions</b> 57:16 <b>communicated</b> 59:2 <b>communicating</b> 432:1 <b>communication</b> 395:3	<b>community</b> 336:10 367:12 407:5 409:7 453:22 <b>company</b> 6:9 258:21 259:14 <b>compelling</b> 279:1 <b>competent</b> 111:19 426:19 <b>complained</b> 280:14 281:1 <b>complaining</b> 188:18 <b>complaint</b> 279:8 281:3 378:10,11 378:19 <b>complaints</b> 279:12 286:22 302:3 307:3 <b>complete</b> 305:13 344:6 353:15 420:17 436:8 <b>completed</b> 4:8 213:7 458:19 <b>completely</b> 139:18 304:21 305:19 436:2,9 449:20 450:11 456:22 <b>compliance</b> 450:8 456:20 <b>complied</b> 109:21 423:21 <b>comply</b> 109:19 423:3 <b>complying</b> 35:21 <b>comprehend</b> 51:14 <b>comprehensible</b> 354:8 <b>computer</b> 203:13 <b>concealed</b> 91:19 92:2 <b>concern</b> 59:19 116:11 245:12 293:11 <b>concerned</b> 24:17 35:6 64:21 108:10 114:13 116:14 131:6 249:9 335:3
---	--	--	---	--

<b>concerning</b> 109:11	<b>considered</b> 65:8 69:2 385:21	<b>continuing</b> 239:19 292:4 338:1	405:8	311:11 314:10
<b>concert</b> 100:9	<b>considering</b> 422:6 457:18 459:4	413:14 416:22	<b>copying</b> 234:19,22 235:22	317:14,19 318:2,8
<b>conclude</b> 424:3	<b>consistent</b> 195:1 421:12 449:6	424:13	<b>core</b> 140:7	320:3 321:9,13,15
<b>concluded</b> 460:18	454:6	<b>contract</b> 370:4,8 390:7,13 396:21	<b>Cornell</b> 2:3 38:21 38:22 39:4,5,17	321:20 327:19
<b>conclusion</b> 424:10 438:22 448:22	<b>consistently</b> 259:10	397:3 412:4,5	55:13 57:20 89:1	328:12 329:12
457:11,15	<b>conspiracies</b> 455:12	454:14 455:5	89:5,16 146:22	330:12,16 333:17
<b>conclusions</b> 313:6 313:20	<b>constant</b> 452:10	<b>contracts</b> 340:5,11 341:11,18	164:14,16,18	334:15,16 335:10
<b>conclusory</b> 436:2 438:13	<b>Constitution</b> 426:14	<b>contractual</b> 319:5	165:15 167:5,17	336:1,16 338:18
<b>condition</b> 319:5	<b>Consumer</b> 60:22	<b>contrary</b> 437:3 438:14 447:15	176:16,18 441:2 442:22	339:2,22 340:6
<b>conditions</b> 57:2 318:1,7 414:13	<b>consummate</b> 429:14	<b>contribute</b> 434:15	<b>Cornell's</b> 38:22	342:7,9,16 343:10
450:1	<b>contact</b> 211:3 215:3 222:19,20	<b>control</b> 147:12 410:6 425:8 438:4	<b>corner</b> 369:11 374:11	343:18 344:20
<b>conduct</b> 30:17 277:8 279:4,9	241:1 296:12	441:13 459:6	<b>corporate</b> 396:17 399:14 429:14,16	345:5,10,16,20
280:2,16 281:3,6	338:17,21 342:21	<b>controlled</b> 8:8	430:2	346:7,18,21
457:10,11,17	352:6 392:16	<b>convened</b> 1:15	<b>corporation</b> 429:19	347:12,15,18
<b>cones</b> 16:16,17 85:8 85:10,12	<b>contacted</b> 48:16 49:3,11 135:11	<b>convenience</b> 292:3	<b>correct</b> 17:7 28:5 33:2 52:12 55:22	348:1,2,8 349:7
<b>conference</b> 88:11 329:11	203:2 357:21	<b>convenient</b> 421:19 457:6	56:3,13,20,21	349:18,19 350:2
<b>confirm</b> 136:10 197:7 213:6 236:6	<b>contacting</b> 202:19	<b>conventional</b> 93:4	57:9,10 58:12,18	353:3,9 355:16,20
242:10	<b>contain</b> 130:17	<b>conversation</b> 370:11 441:5	58:19,21,22 59:4	356:1,5,8,19,20
<b>confirmed</b> 186:18	<b>contemplation</b> 415:1	<b>conversations</b> 126:4 339:9,13,17	59:5,14,15,21	357:3,6 358:4,14
<b>confirming</b> 137:6	<b>contention</b> 111:4 278:8	<b>convinced</b> 389:17	64:5 65:11 80:8	358:19 359:3,9,16
<b>conflict</b> 7:10	<b>CONTEXTS</b> 2:1	<b>cool</b> 11:19 19:8 61:16,21 75:15	80:11,17,20 84:19	360:4,6,17 361:4
<b>conflicting</b> 179:20 180:15	<b>context</b> 314:5	166:6,7 167:21	85:1,7 86:6,9,10	361:7,14 362:12
<b>confronting</b> 143:14 143:16	<b>continual</b> 354:5	172:9,10,12,16	86:13,22 87:3	363:3,13,21
<b>confusing</b> 94:12 309:8,11 401:16	<b>continuation</b> 3:5 413:16	174:6,7 383:6	93:12,17 136:13	364:10,14 365:16
<b>confusion</b> 74:17 80:5,22 375:22	<b>continue</b> 38:13 98:1 112:17 158:6	402:4 443:12	136:16 137:14	366:5,9,16 376:2
<b>connect</b> 79:8	180:19 209:14	<b>cooperate</b> 445:14	138:2,21 139:3,7	377:9 384:7
<b>connected</b> 203:12 420:1	239:14 296:1	<b>cooperated</b> 434:12	140:4,11,15,18,19	386:17 389:1,21
<b>connection</b> 75:9,21 399:3,4,9 427:13	319:12 389:6	<b>cooperation</b> 285:11	143:14 144:5,9,22	392:1 396:4
<b>consider</b> 93:7 402:3 458:22	414:19	<b>cooperative</b> 204:6	145:12,20 161:20	397:10,13,14,17
460:8	<b>continued</b> 47:22 173:16 212:13	<b>copies</b> 208:4 234:3	165:9 174:22	402:14,22 403:6
<b>considerably</b> 156:10 194:11	319:17 352:16	<b>Copp</b> 429:5,5	188:10 215:19	403:13 404:16
	411:11 414:1	<b>Copps</b> 452:20	224:22 226:20	406:2 433:3
	415:15	<b>copy</b> 218:6 219:20 248:19 266:10	230:20 233:2	<b>corrected</b> 256:18 259:7 402:4
	<b>continues</b> 457:13	271:1 288:11	236:14 237:4,15	<b>Correctional</b> 90:19 90:20
		311:16 315:14,15	237:16 242:10,14	<b>corrections</b> 90:15 90:18 91:4,9
		320:16,19,21	245:20 251:16	145:11 422:17
		334:5,9,11 356:12	256:2 258:20	443:2
			262:20 266:10	<b>correctly</b> 94:21 257:16 344:3,21
			270:6 277:4 305:4	<b>corresponded</b> 399:11
			309:2,17 310:13	<b>correspondence</b> 213:15 215:6
			310:14,22 311:7	216:2 219:5

223:14 227:1	<b>crammed</b> 399:8	409:17 435:18	222:9 232:22	60:21
233:8 237:13	<b>crash</b> 103:15	447:19 450:22	233:10 235:7,11	<b>DD</b> 2:19
243:14 246:21	119:19 124:15	<b>crowded</b> 97:4,22	240:7 242:2	<b>deal</b> 55:6 276:21,22
251:15	<b>crazy</b> 454:21	117:21,22 118:1	244:15,16,19	292:12 415:17
<b>cost</b> 215:20	<b>create</b> 424:13	136:21	248:6 250:16	416:6 421:14
<b>counsel</b> 4:22 125:1	<b>created</b> 434:17	<b>crowding</b> 418:9	252:18,22 254:11	450:9 454:12,13
158:20 283:20	<b>creates</b> 442:18	<b>crowds</b> 384:6	254:15,16 255:21	456:15
316:10 320:17	448:13	390:21 409:3	257:5 261:14,18	<b>dealing</b> 22:17
331:9 344:13	<b>credence</b> 407:22	<b>cruiser</b> 369:11,21	262:16 264:9	118:8 187:19
354:1 405:4 452:8	<b>credibility</b> 327:4	382:22,22	265:7,21 268:7	203:8 282:6 433:8
459:11	411:4	<b>cruisers</b> 398:5,6,9	269:13 270:5	444:18
<b>counsel's</b> 3:13	<b>credible</b> 414:3,9	<b>curious</b> 50:10	272:15 273:17	<b>dealt</b> 299:13,14
283:15	418:21	380:10	301:3 306:21	<b>death</b> 102:5 121:13
<b>count</b> 37:14 149:10	<b>credit</b> 212:4 213:5	<b>current</b> 411:14	307:4 311:13	<b>decedent</b> 178:18
453:3	222:4,18 407:20	<b>currently</b> 5:11	315:20,20,22	<b>decedents</b> 100:19
<b>counter</b> 429:14	437:15	209:13,19	316:1 317:14	101:11,17
454:8	<b>credited</b> 282:9	<b>customer</b> 7:10	321:16 324:7,15	<b>December</b> 250:6
<b>counters</b> 430:3	<b>credits</b> 221:15,19	<b>customers</b> 9:11	343:7 347:1	269:14,21 270:5
<b>couple</b> 18:1 39:7	222:2 243:2	<b>cut</b> 16:13,14 20:7	351:21 352:18	379:11
43:22 60:19 62:16	277:20,21 342:3	188:16 305:19	356:22 357:8	<b>decide</b> 29:4 284:4
73:5 83:21 84:3	349:22 351:20	306:4 444:7	397:12 440:10	<b>decided</b> 180:12
86:20 121:20	358:22 412:13	<b>cutting</b> 43:3,4	451:22	182:5 383:2
127:3 133:10	<b>creed</b> 430:2	187:7 281:9	<b>dated</b> 272:17 321:2	<b>decipher</b> 336:3
136:10 142:5	<b>crime</b> 370:2	<b>cuttings</b> 67:22	322:3 323:20	<b>decision</b> 169:10
256:1 297:22	<b>crimes</b> 280:20	<b>CX</b> 1:8	326:9	170:2 300:18
306:11 352:1	443:20		<b>dates</b> 213:4,6 236:3	459:1 460:9
359:19 363:5	<b>criminal</b> 177:11		236:6,7 241:10	<b>decisions</b> 177:22
395:4 400:19	426:12 428:22		245:1,3,6 250:7	178:6
419:22 423:17	<b>criteria</b> 205:22	<b>D</b> 2:11 223:19,21	250:10 251:4	<b>dedicated</b> 416:4
424:14 433:4	<b>criticism</b> 355:2	224:4,5	268:20 269:6,10	<b>defending</b> 163:2
<b>course</b> 91:8 96:7	<b>Cropp</b> 148:19	<b>D.C</b> 1:14 49:22	451:22	<b>defense</b> 164:21
160:21 379:14	<b>cross</b> 2:2 49:16	187:15 188:3,4	<b>day</b> 61:15 200:13	<b>defenses</b> 286:16
410:14 421:18	287:15 298:16	459:1	202:5 207:13	302:12
422:4 456:4	308:1,10,13 315:8	<b>dance</b> 117:8	241:18 243:11	<b>deficiency</b> 436:18
457:10,11,17	333:12 344:17	<b>dancer</b> 368:6	266:5,6,9 306:12	<b>defined</b> 445:2
<b>court</b> 84:19 286:11	371:15	<b>danger</b> 14:11	310:3 370:11	<b>definitely</b> 389:15
289:13 290:1	<b>CROSS-EXAMI...</b>	110:13 284:7	412:9	<b>definition</b> 128:1
378:1,18,21,22	49:17 136:4	303:16 407:5,8	<b>day-to-day</b> 160:1	148:4,5
379:2,13 383:9	<b>crowd</b> 25:15 31:5	424:14 441:21	<b>days</b> 94:21 199:12	<b>defuse</b> 421:5
437:4 445:5	32:6,9 58:9 62:4	442:1,5 447:13	199:13 226:19	<b>defusing</b> 421:10
<b>Court's</b> 379:9	63:14 64:9 71:19	448:16 451:1	258:22 259:22	<b>degradation</b>
<b>courtesy</b> 312:6	71:20,21 72:2,3,4	458:10,13	262:19 283:13	305:13
410:20	72:22 73:3 96:14	<b>dangerous</b> 92:9	343:18 352:1	<b>deliberating</b>
<b>courts</b> 379:4	97:3,21 101:22	93:8 386:21	433:5	459:14
<b>coverage</b> 446:21	139:9 206:4	423:19	<b>DBR</b> 353:6	<b>delivered</b> 394:13
<b>covered</b> 206:9	373:10,14 387:22	<b>dark</b> 28:9	<b>DC</b> 134:12	<b>demand</b> 107:17
<b>covering</b> 25:14	388:2,4 391:5	<b>date</b> 210:6 215:5	<b>DCRA</b> 6:18,22	<b>demanded</b> 447:9
		218:17 221:20		

<b>demanding</b> 383:18	<b>described</b> 61:14	413:7,12,21	123:6 275:8	356:4 378:12
<b>demands</b> 426:10	184:14 217:3	415:17 416:5	331:10 332:21	379:15,17
427:5 437:5	<b>describing</b> 333:3	424:6 430:5	354:10 379:2,13	<b>discrepancies</b>
<b>demeanor</b> 11:17	<b>deserves</b> 298:18	432:16,21 433:19	380:11 391:16	259:15 277:22
15:9 29:20 104:17	<b>designated</b> 200:7	438:17 446:3,11	412:19	351:19 392:21
107:11 112:9	<b>despite</b> 280:11	446:12 451:16	<b>difficulties</b> 428:2	393:3 412:9,11
166:4 168:3,5	304:2,3 411:9,12	457:17	<b>digital</b> 203:17	432:18
171:13,16	431:6 433:14	<b>detailed</b> 309:1	293:22	<b>discrepancy</b> 211:18
<b>demographic</b> 425:9	438:13	369:22	<b>dilatory</b> 259:11	259:19 349:8,15
426:22	<b>detail</b> 59:12 66:4	<b>details</b> 213:7,9	<b>diligent</b> 278:11	392:6,11,15
<b>demonstrate</b> 259:3	68:1,7 98:12	278:17 279:5	<b>dime</b> 455:16	431:13
294:7	147:5,9 173:4	281:8 328:22	<b>direct</b> 2:2 5:3 81:6	<b>discretion</b> 430:5
<b>demonstrated</b>	204:11,17,20	333:17 342:6	89:12 140:14	431:1
258:20 426:17	205:1,7,10,21	369:15 382:11	143:3,4,18 149:10	<b>discrimination</b>
<b>denied</b> 174:4	206:2,12,16	433:9 450:10	159:2 163:20	451:20 452:2
<b>deny</b> 414:17	209:12,19,22	455:2	188:15 251:3	<b>discriminatory</b>
<b>Deonce</b> 89:5,16	211:2 215:16	<b>detain</b> 179:15	286:14 308:22	425:14 426:13
<b>department</b> 7:2	230:15 240:20	361:19 368:6	309:15 326:21,22	<b>discuss</b> 99:5 408:1
24:18 49:4,11	245:2 254:10	<b>detained</b> 170:12	327:1 330:8 344:9	<b>discussed</b> 317:22
60:22 90:22	261:17 264:8	<b>detective</b> 48:19	355:18 432:11	327:17
135:11 201:11,15	267:17 272:14	202:2	<b>directed</b> 23:19	<b>discusses</b> 414:13
202:18 204:5	273:6 275:12	<b>detectives</b> 202:8	124:2 192:4	<b>discussing</b> 140:14
241:21 246:14	276:14 277:9	<b>detector</b> 77:1 151:3	<b>direction</b> 31:9,15	191:5 295:5 303:2
259:9,20 260:6	278:9 280:7,12	151:12,14	34:1 42:18 185:2	396:17
264:14 275:12,18	284:16 285:5,7,10	<b>detectors</b> 93:13	185:10 186:1,6	<b>discussion</b> 29:5
280:1 281:6 283:7	285:18 291:13	<b>Detention</b> 145:12	427:20 453:4	73:20 75:6 137:11
286:18 296:5	294:9 296:14	<b>Detentions</b> 90:16	<b>directive</b> 313:2	282:19 324:7
297:16 307:9	299:9 304:3	<b>determination</b>	324:8 328:10,14	328:21 329:7,10
348:2 357:6,10,22	308:22 309:17	289:17 412:3	<b>directives</b> 312:15	336:11 337:6
398:13 408:15	310:3 319:13	<b>determine</b> 151:18	<b>directly</b> 59:18	414:10
409:10 410:2	327:15 328:6,18	152:1 161:10	79:12,19 163:5	<b>discussions</b> 337:12
429:15,17,18,21	329:8 336:13	303:15 340:17	196:19 203:13	337:16,18 338:7
430:3,12 434:3	337:1 338:14	<b>deterring</b> 370:2	204:13 235:5	<b>disjointed</b> 354:18
439:7 443:13	339:1,2,5,15	<b>developed</b> 457:6	296:11 328:14	<b>disperse</b> 134:20
445:11 447:8	342:19,21 352:4	<b>diagram</b> 324:6	330:14,15 365:8	<b>disposed</b> 343:9
<b>Department's</b>	358:2,14 359:8	326:11,13 327:9	420:10	<b>disposition</b> 321:2
280:1	367:9,13,21 368:5	<b>dialed</b> 186:11	<b>disagreement</b>	322:14,19 323:18
<b>depends</b> 457:5	368:7 369:1,13	<b>dialogue</b> 69:11	420:7	<b>dispositions</b> 323:6
<b>deposition</b> 379:19	370:5,18 371:5,10	<b>die</b> 102:14	<b>discern</b> 22:11	<b>dispute</b> 338:18
<b>depositions</b> 357:17	371:13 374:4	<b>died</b> 101:17,22	<b>discerned</b> 447:3	408:8 409:11
377:11	376:11,12,13	103:1,14 119:17	<b>disconnect</b> 431:20	420:9 430:16
<b>describe</b> 8:17 37:20	382:17 383:3	120:1	436:8	434:9
69:4 91:21 92:21	392:14 393:8	<b>difference</b> 102:18	<b>discontinue</b> 206:15	<b>disputed</b> 264:13
94:2 96:5 97:1,17	397:16 398:3,7,10	232:13 255:5	<b>discontinued</b>	267:19 278:19
147:19 161:4	399:13 400:10	268:12,15	209:20 213:10	430:6
181:2 202:6	409:10 410:5	<b>different</b> 21:6	306:9	<b>disregard</b> 437:6
247:20 436:4	411:10 412:16	66:10 67:4 79:20	<b>discovery</b> 195:14	450:11 451:19

452:9 455:9	214:13,16 216:21	136:2 151:2	<b>drinking</b> 69:15	230:10 232:4
<b>disregarded</b> 449:8	219:4 220:12,15	160:14 162:7	388:14,19 389:1	233:1 235:1,2,6,8
<b>disrespect</b> 63:5	223:13 224:13	184:16,18 191:3	435:2,4	235:15,16 236:1
<b>disrespectful</b> 181:7	226:22 227:21	311:18 317:18	<b>driver</b> 127:6	237:12
<b>disrespecting</b> 69:15	228:3 229:12	329:12 355:17	176:22 177:2	<b>e-mails</b> 208:16
<b>dissipate</b> 71:19	230:22 231:22	389:4,16 390:1,3	178:19,22 361:20	220:20 231:1
<b>distance</b> 87:10	233:7 234:11,14	399:12 418:17	<b>driveway</b> 20:7	234:15
366:13,18	237:11 239:21	422:10 428:16	26:19 72:9 184:7	<b>eager</b> 189:9 391:10
<b>distracted</b> 316:10	240:1 243:13	430:22 431:21	365:2 375:1,2	<b>earlier</b> 23:14 51:18
395:21	244:2,7,10 246:20	433:11 441:8	<b>driving</b> 119:13,15	72:8 85:17 103:6
<b>District</b> 1:1,16 3:12	247:11,18,21	442:13 443:2	120:1 362:5	103:14 117:11
3:18 5:9 84:17	251:13 252:3,12	451:5	384:20 435:21	124:3,16,20 172:5
88:5 177:12	253:6,17 254:6,8	<b>dollar</b> 385:14	436:6	172:8 173:9
191:20 196:11	254:19 261:11,15	<b>dollars</b> 306:4,5	<b>drop</b> 305:17	208:22 209:5
258:10,11 278:13	264:4,6 265:4,16	432:19 455:17	<b>drove</b> 438:12	217:3 339:19
278:16 294:13	265:18 267:13,15	<b>DONALD</b> 1:20	<b>drunk</b> 51:13	378:1
301:9 304:16	270:20 272:10,12	<b>door</b> 8:21 61:14	<b>duck</b> 37:9	<b>early</b> 9:15 32:6
312:19 332:9	273:2,4,10 274:4	77:19 78:2,16,22	<b>ducking</b> 373:8	52:3 160:22
334:12 354:1,2,7	275:3,6,15 276:9	79:1,11 86:11	<b>due</b> 209:12 222:4	305:19 334:21
378:20,21,22,22	288:9 289:9,11	87:2,6,8,9,12	243:1 256:16	337:3 385:12
379:9 400:18	300:5,7 301:1,14	126:17 130:8	278:2 348:1 361:6	416:17 428:18
404:8 406:22	315:11,12,15,19	131:11 141:14,15	420:18	434:19
407:2 410:16,20	316:15,18,19	142:13,14 143:12	<b>duly</b> 5:1 89:7	<b>easily</b> 386:20
412:12,14 413:1,5	322:1,2,5,7	153:13 161:15,20	158:21	<b>ECF</b> 379:7
416:12 420:21	323:22 324:3	184:7 185:11,12	<b>duties</b> 90:3 91:4	<b>edge</b> 31:6
437:4 438:18	334:16 346:7	186:12,13,14	94:15 95:19,21	<b>Edward</b> 4:11,21
439:2,11 440:9	352:10,12,15	197:18 382:21	96:3 145:19	5:7
445:3 448:9	377:22 378:3	383:1,15 384:1	159:17	<b>effect</b> 336:21
450:13 451:5	379:8 416:14	388:20	<b>duty</b> 95:1	<b>efficiently</b> 437:2
452:3 458:3,14,16	431:16 439:11	<b>doors</b> 78:5,6,7,8,8	<b>DVR</b> 203:11,16	<b>effort</b> 445:19
459:6	440:10	113:19 418:4	279:18	<b>efforts</b> 426:19
<b>District's</b> 66:18	<b>documentation</b>	419:12		<b>eight</b> 27:17 211:22
278:7 334:7	249:7	<b>doorway</b> 87:3,4	<b>E</b>	212:3,6,6,7 243:7
354:12 420:14	<b>documented</b>	383:16	<b>e</b> 2:11 209:7 217:14	286:19 304:2
449:3	318:10 401:10	<b>double</b> 177:3,4,19	221:20 222:6,14	325:19,21 327:14
<b>disturbance</b> 140:10	<b>documents</b> 255:6	<b>doubled</b> 255:7	224:20 226:5	328:5
174:1 176:11,13	260:19 263:4,16	<b>download</b> 202:19	227:7,9,12,13	<b>eight-man</b> 369:14
384:10 453:20	267:4 271:22	203:12	<b>e-mail</b> 207:13	<b>Eighteen</b> 153:9
<b>disturbing</b> 57:17	274:18 289:5	<b>downs</b> 77:1	208:13,19,22	<b>either</b> 22:4,7,10
70:19 424:20	340:22 406:1	<b>dozen</b> 454:18	209:1,4,5 210:3	83:1,8 108:2
437:17 449:9,10	<b>doggone</b> 452:22	<b>draw</b> 60:1 379:5	210:11 213:12,18	128:5 131:16
<b>diversity</b> 378:21	<b>doing</b> 19:20 34:22	416:8	214:17 217:2,6,18	164:3 278:15
379:12	35:11 42:21 43:10	<b>drawing</b> 16:5 209:3	218:10,20,22	279:6 313:18
<b>division</b> 275:13	44:17 45:1,2,3	268:18 269:2	219:5 220:16	314:20 412:5
446:14	54:22 58:4 70:7	<b>drawn</b> 119:14	221:1,5 224:16	413:11 414:18
<b>dock</b> 77:18	93:15 95:4 117:2	<b>dreads</b> 10:1,21	225:3,6 228:4,15	427:19 433:20
<b>document</b> 208:9,12	126:15 135:22	11:6,15 16:7 36:1	229:14,18 230:5,9	<b>ejected</b> 63:20 64:4

65:6 70:13 73:21 74:2,16 75:7,13 137:3 150:10,14 154:19 <b>elapsed</b> 39:12,18 <b>element</b> 431:22 <b>elicit</b> 82:1 127:20 127:22 304:12 <b>elicited</b> 353:18 <b>elusive</b> 458:7 <b>EM</b> 192:17 <b>email</b> 240:2,4,8 241:3 242:7 244:11 247:22 248:3,7,14 250:20 251:2 252:15 253:7 358:20 370:21 371:12 381:15 <b>emails</b> 344:1 380:8 380:9 381:2,4 394:5 445:18 <b>Emanuel</b> 3:21 <b>emergency</b> 77:6,12 77:19 78:6,7,8,17 78:18,21 79:22 132:12 133:1 187:14 420:22 421:1 440:19 <b>emotion</b> 102:2 <b>emotional</b> 121:13 121:14 122:10,12 142:11 179:16,17 445:8 <b>emotions</b> 118:10 124:2 126:11,14 127:1 128:18 421:7,9,11 441:13 444:19,21 457:21 <b>employ</b> 206:1 <b>employed</b> 5:12 6:1 89:18,20 205:6,20 206:12 276:13 436:20 <b>employee</b> 188:4 <b>employees</b> 96:2 <b>employing</b> 205:10	<b>employment</b> 206:16 <b>EMS</b> 132:20,22 134:13,15 135:3 191:14,19 192:11 192:17,18 193:3 195:18 386:17 430:19 <b>EMT</b> 188:9 189:8 <b>encounter</b> 9:11 161:17 <b>endeavor</b> 112:3 446:18 <b>ended</b> 45:3 68:11 <b>ends</b> 36:16 <b>enforce</b> 354:9 <b>enforceable</b> 313:14 414:12 455:7 <b>enforcement</b> 458:1 <b>engage</b> 391:14 <b>enjoy</b> 426:16 <b>enormous</b> 433:14 <b>ensure</b> 410:8 426:5 <b>enter</b> 18:5 85:7 341:10,18 375:7 <b>entered</b> 219:11 223:20 231:8 233:15 237:20 243:19 247:6 251:20 253:12 263:11 266:15 271:15 274:11 276:3,7 301:7 334:6 <b>entering</b> 8:9,10 340:22 <b>entertainers</b> 206:3 <b>entertainment</b> 409:16 <b>entire</b> 53:22 321:18 333:2 <b>entirely</b> 447:6 <b>entirety</b> 281:10 <b>entitled</b> 350:16 412:20 434:7 <b>entitlement</b> 455:1,3 <b>entity</b> 429:18 430:9	<b>entrance</b> 10:22 13:9,14 144:21 145:3 365:16 367:1 <b>entry</b> 8:6,9,19 20:5 26:20 36:4 52:12 86:6 87:8 <b>entryway</b> 8:3,17,20 9:1 31:4 58:15 84:22 <b>equipment</b> 7:11 189:15 202:20 203:11 279:18 442:9 <b>escalated</b> 280:21 <b>escalation</b> 304:9 <b>escort</b> 394:4 <b>escorted</b> 10:1,20 11:2,4 57:14 58:2 109:6 161:8 162:14,16 163:9 164:15 171:6,7 175:18,20 180:22 388:20,22 417:14 <b>escorting</b> 11:5 21:5 69:20 71:22 72:2 383:14 423:12 <b>especially</b> 64:16 139:10 421:7,8,9 421:10 453:21 <b>essence</b> 414:15 450:3 <b>essentially</b> 51:20 59:6 85:5 258:17 282:21 328:18 335:1,5 344:10 379:1 <b>establish</b> 302:15 <b>established</b> 408:4 408:14 409:22 416:21 418:11 419:17 420:15 457:18 <b>establishing</b> 102:4 <b>establishment</b> 4:1 5:19 8:22 9:6,12 9:18 10:20 16:8	16:21 18:6 32:22 33:20 38:8 46:14 47:11 51:20 52:18 54:13,18 55:3,21 56:20 58:10,11 59:13,20 86:11 93:20,22 94:16 101:14 102:4,7,10 117:13 136:13 137:4 143:6,7 145:15 146:9 158:14 159:8,13 159:19 160:2,5,8 160:11,15,18 161:2,9,11 165:17 167:18,19 169:16 170:3,10,18 173:18 174:5 175:14 176:7,9 180:6 194:13 204:12 205:1,7,11 206:13 241:20 276:15 277:3,7 280:11 281:20 284:15 285:21 304:11 305:15 306:13 310:16 311:7,11 312:14 314:13,18 317:18 321:12 329:1 333:15 334:14 340:4,6,12,19 341:10,17 345:20 352:14 358:18 363:3,20 368:12 374:16 396:22 407:7,14,19 408:7 409:1,4,8,16,18 409:21 410:7,9,13 411:5,7,8,12 412:15,17,18 413:13,18,19 414:4,10,13,17 415:8,14,19 417:2 417:13,15,21 419:18 420:10 421:4,19 422:9	423:2,13,18 424:8 424:11 425:4,6,8 425:20,22 426:1,4 426:8,19 427:14 427:17 428:16,20 431:4,12,13 432:14 433:15 434:11 436:14,15 437:8 438:5,8,17 439:9,18 441:20 441:22 443:3 445:14,22 446:7 446:10 447:20 448:13,15,20,21 449:15 451:2,4,11 451:11,12 452:14 453:13 454:5,11 454:13,20 455:14 455:20 456:13,22 457:12,19 458:7,9 <b>establishment's</b> 39:14 52:22 53:2 53:12,14,15,17 54:15 111:5 414:1 418:4,13 456:12 457:15 <b>establishments</b> 49:22 50:2 412:20 412:22 416:5 427:22 445:16 450:4,9 454:18 <b>etcetera</b> 7:12 <b>evasion</b> 456:16 <b>evasive</b> 449:20 <b>evening</b> 61:15 62:8 64:11 65:9 96:8 98:6 99:20 170:18 286:20,21 382:5,7 382:8 <b>event</b> 48:20 99:19 100:1,4,6,18 103:15 124:19 136:12 152:1,8 342:20 343:3,12 350:11 351:21 389:10,17 390:1 399:13
---	--	---	--	--

<b>events</b> 124:3 151:21 286:21 302:11 303:19 305:21 331:8 360:5,16 368:3 390:3 435:5,8 446:14,16	410:10 412:19 413:2,9 415:16,21 416:3,12 417:9 418:10 420:17 421:2 423:14,20 432:13,16 437:3 437:10 438:11 446:4 447:10 449:1,7 450:19 451:8,9,15,17 453:6,13 454:5 456:19	393:13 <b>excused</b> 87:19,21 155:17 156:1,8 312:1,7 405:15 460:13 <b>Executive</b> 308:2 <b>exemplary</b> 442:21 447:16 <b>exercise</b> 413:5 <b>exhibit</b> 2:8 84:6,9 84:17,18 86:3,3 86:19,19 208:6 213:18,20 214:1,4 216:8,9,13 219:10 219:11 220:2,3 223:19,20 224:4,5 227:7,8,12,13 228:20,21 229:4 230:6 231:7,8,13 231:14 232:4 233:14,16,19,20 237:19,21 238:2,3 243:19,20 244:1,3 245:12 247:5,6,10 247:12 250:9,11 251:6,20,21 252:2 252:4,11 253:11 253:12,16,18 254:4,21 255:10 256:13 257:2,17 257:21 258:1,3,6 258:8,12 260:20 261:10 262:12 263:10,11,17 264:3 265:3,15 266:14 267:5,13 268:3 269:2,12,16 269:20 270:19 271:14 272:1,9 273:1,9 274:4,5 274:19 275:2 276:2,3,7,10 288:8 300:4 301:7 301:8,15 334:7,12 345:14 347:7,8 348:13 355:8,10 378:6,7,10 380:12	380:13 403:20 404:3,19 405:20 416:12 <b>exhibits</b> 8:13 84:4 258:11 263:12,15 266:16 267:2 271:16,20 274:11 274:12,16 344:1 345:1 347:5 446:5 446:5 <b>exhortation</b> 327:18 328:10 <b>exhortations</b> 328:20 <b>exist</b> 313:12,13,17 313:21,22 427:17 <b>existed</b> 412:4 <b>existence</b> 204:11 <b>exists</b> 458:11 <b>exit</b> 9:20 78:17,18 78:21 79:22 129:20 130:6,6,7 169:18 181:9 363:14 385:17 417:21 <b>exiting</b> 26:17 180:11 182:10 184:22 185:12 363:22 372:18 <b>exits</b> 51:19 77:7,12 421:16 <b>expectation</b> 410:2 413:12 456:7 458:8 <b>expectations</b> 314:17 414:12 423:22 <b>expected</b> 152:11,12 152:13 451:16 <b>expects</b> 452:16,22 453:1 <b>expended</b> 446:5 <b>experience</b> 24:4 66:21 91:22 93:4 93:5,13 95:4,6,16 187:19 340:21 369:1 422:17	429:9 443:2 <b>expert</b> 66:15 332:5 <b>explain</b> 294:16 <b>explained</b> 54:22 68:22 116:11,12 <b>explains</b> 102:7 <b>explanation</b> 278:20 <b>exposed</b> 188:14 <b>expressed</b> 126:14 <b>expressing</b> 127:1 <b>extended</b> 413:2 <b>extensive</b> 385:21 <b>extent</b> 281:19 282:12 287:6 342:4 449:10 <b>extinguisher</b> 386:9 386:13,15 401:5 402:14,15 403:16 <b>extra</b> 153:4 192:15 334:5,9 <b>extraordinarily</b> 426:18 <b>extreme</b> 411:21 <b>extremely</b> 309:8 422:19 <b>eyes</b> 52:2 417:11,17 417:22 418:2,8 419:2,6,13 437:19 <b>eyewitness</b> 435:19
<b>evidence</b> 74:20 111:12 177:9,12 214:7 216:8,16 219:11 220:6 223:20 224:8 227:8,16 228:21 229:7 231:8,17 233:15 234:1 237:20 238:6 243:20 244:4 247:6,13 251:21 252:5 253:12,19 258:8,19 259:2 260:21 263:11,18 266:15 267:3,6 271:15,21 272:2 274:12,17,20 276:3,8,11,21 279:2,17 280:19 281:18 282:2,9,14 282:16,20 283:1 293:17,20 294:3,6 301:8,16 304:6 306:8,13 334:6 353:2,4,8 355:19 356:1,3 380:3 399:18,22 405:22 406:1 408:14	<b>evident</b> 431:7 <b>evidentiary</b> 111:8 <b>exact</b> 359:2 402:20 <b>exactly</b> 92:6 99:8 106:13 108:16,17 109:10 118:20 122:5 123:16 129:18 130:2 133:9,11 134:5 147:10,14,17 176:11 238:12,19 287:17 311:3 393:19 394:8 427:5 437:11 438:11 443:9,9,11 451:21 <b>examination</b> 5:3 76:4 89:12 159:2 239:19 308:13 309:15 315:8 330:8 333:12 344:9 355:19 371:16 396:1 400:21 <b>examine</b> 425:19 <b>examined</b> 5:2 89:7 158:22 298:17 <b>exception</b> 200:15 <b>exchange</b> 56:19 <b>exchanged</b> 24:11 <b>excuse</b> 53:1 73:22 220:22 257:12 290:21 292:10 341:12 347:8 367:16 389:19	<b>excused</b> 87:19,21 155:17 156:1,8 312:1,7 405:15 460:13 <b>Executive</b> 308:2 <b>exemplary</b> 442:21 447:16 <b>exercise</b> 413:5 <b>exhibit</b> 2:8 84:6,9 84:17,18 86:3,3 86:19,19 208:6 213:18,20 214:1,4 216:8,9,13 219:10 219:11 220:2,3 223:19,20 224:4,5 227:7,8,12,13 228:20,21 229:4 230:6 231:7,8,13 231:14 232:4 233:14,16,19,20 237:19,21 238:2,3 243:19,20 244:1,3 245:12 247:5,6,10 247:12 250:9,11 251:6,20,21 252:2 252:4,11 253:11 253:12,16,18 254:4,21 255:10 256:13 257:2,17 257:21 258:1,3,6 258:8,12 260:20 261:10 262:12 263:10,11,17 264:3 265:3,15 266:14 267:5,13 268:3 269:2,12,16 269:20 270:19 271:14 272:1,9 273:1,9 274:4,5 274:19 275:2 276:2,3,7,10 288:8 300:4 301:7 301:8,15 334:7,12 345:14 347:7,8 348:13 355:8,10 378:6,7,10 380:12	<b>exit</b> 9:20 78:17,18 78:21 79:22 129:20 130:6,6,7 169:18 181:9 363:14 385:17 417:21 <b>exiting</b> 26:17 180:11 182:10 184:22 185:12 363:22 372:18 <b>exits</b> 51:19 77:7,12 421:16 <b>expectation</b> 410:2 413:12 456:7 458:8 <b>expectations</b> 314:17 414:12 423:22 <b>expected</b> 152:11,12 152:13 451:16 <b>expects</b> 452:16,22 453:1 <b>expended</b> 446:5 <b>experience</b> 24:4 66:21 91:22 93:4 93:5,13 95:4,6,16 187:19 340:21 369:1 422:17	<b>expert</b> 66:15 332:5 <b>explain</b> 294:16 <b>explained</b> 54:22 68:22 116:11,12 <b>explains</b> 102:7 <b>explanation</b> 278:20 <b>exposed</b> 188:14 <b>expressed</b> 126:14 <b>expressing</b> 127:1 <b>extended</b> 413:2 <b>extensive</b> 385:21 <b>extent</b> 281:19 282:12 287:6 342:4 449:10 <b>extinguisher</b> 386:9 386:13,15 401:5 402:14,15 403:16 <b>extra</b> 153:4 192:15 334:5,9 <b>extraordinarily</b> 426:18 <b>extreme</b> 411:21 <b>extremely</b> 309:8 422:19 <b>eyes</b> 52:2 417:11,17 417:22 418:2,8 419:2,6,13 437:19 <b>eyewitness</b> 435:19
				<b>F</b>
				<b>F</b> 2:12 228:20,22 229:4 230:6 378:7 <b>face</b> 53:6 104:6 106:18 137:8,14 148:10 162:22 <b>faces</b> 365:14,15 366:4 <b>facility</b> 92:10 <b>fact</b> 5:18 66:14 77:6 111:15 124:15 159:7 179:13 200:12 204:6,22 228:6 230:4 232:15 236:22 245:14 252:14 253:3

255:21 257:3	<b>far</b> 129:18 130:5,10	169:14 171:5,8	241:22 259:10,21	186:15 187:11
258:17 262:2,12	193:21 281:19	181:4 182:10	260:7 431:3,18	192:22 205:9
264:12 266:8	283:22 284:10	184:9	454:11	208:15 211:13
297:1 304:1,2,4,8	286:3,9 312:11	<b>fences</b> 113:6,7	<b>find</b> 69:11 88:10	278:21 279:13
310:19 311:8,16	326:19,20 335:3	<b>Ferretti</b> 149:1	93:2 99:19 115:16	281:7,17 308:21
311:22 313:20	366:19 419:15,15	352:3,10,13 433:6	115:19 118:4,7	309:16 326:7
314:3 327:2	445:15	433:18	122:2,3,7 123:16	334:21 335:2
350:20 366:14	<b>farther</b> 194:11	<b>FF</b> 288:8 301:7,8	132:2,6 133:8,10	351:22 369:12
392:10 398:2	<b>fashion</b> 423:9	301:15 355:8,10	134:7 142:9,14	392:17 395:14
399:5,11 401:17	<b>faster</b> 139:12	378:6,8,9,10	149:4 176:10	408:21 425:14
401:22 402:13	<b>fault</b> 259:12 284:15	<b>field</b> 90:14 211:3	193:9,12 241:8	427:7 443:6
403:10,14,15	285:22,22 393:4	<b>Fifteen</b> 91:7 130:14	343:15 381:11	<b>fit</b> 50:22 51:3,8,10
409:4 410:18,21	<b>February</b> 207:15	153:1,2	445:16	<b>five</b> 26:5 141:7,8
411:10,12,17	207:16 209:16	<b>fight</b> 59:22 69:22	<b>finding</b> 140:6	159:15,15 205:12
413:20 416:11	215:7 216:2	91:15 108:5	310:20 313:3	205:19 212:2
420:19 437:10	240:16 250:7	110:10 122:16	401:18 402:13	238:8 308:3 310:4
438:21 450:22	268:9 271:5	150:4,4 387:9	403:10,14,15	343:18 369:13
<b>fact-finding</b> 321:1	272:17 323:10,11	435:16	413:20	408:5,9 414:6,7
322:14,19 323:6,9	323:20 325:11	<b>fighting</b> 28:17 30:6	<b>findings</b> 241:9	448:3 454:2
323:17,17	326:12,17,18	123:6 166:12	313:20 438:21	455:15
<b>facts</b> 136:10 292:16	327:7,19 328:11	183:9,13 364:13	<b>fine</b> 117:17 139:20	<b>five-day</b> 343:12,19
293:3 295:12	328:11 339:14	420:3	142:10 156:17	<b>five-minute</b> 406:11
407:20 417:5,6	371:3 431:5	<b>fight</b> 122:17	<b>finish</b> 94:5,13	<b>flashes</b> 32:2,3
420:14 424:1	<b>federal</b> 379:4	415:18 421:14	123:22 174:12	<b>flashlight</b> 189:7
449:7	<b>feel</b> 19:3 187:4	<b>figure</b> 75:21 99:8	288:1 298:11	<b>flight</b> 279:15
<b>fail</b> 281:7	<b>fees</b> 433:16	115:10 285:15	318:22 337:22	<b>floor</b> 117:9 153:14
<b>failed</b> 304:7	<b>feet</b> 24:9 26:5 27:17	452:15	<b>finished</b> 29:7	386:13 394:2
<b>failing</b> 437:9	27:22 28:5 36:16	<b>figuring</b> 278:2	314:12	<b>flow</b> 70:20
447:13	36:16,18 87:11	<b>file</b> 337:1 402:20	<b>finite</b> 400:13	<b>focusing</b> 25:15
<b>failings</b> 437:9	130:13,14 190:12	<b>filed</b> 279:13 336:22	<b>fire</b> 373:10,14	<b>folks</b> 6:20 18:4 21:4
<b>failure</b> 407:20	194:2,2,9,20,20	378:11,18 379:10	386:9,13,14 401:5	92:14 178:13
446:1 457:16	365:16,22 366:1	379:12	402:13,15 403:15	191:22 227:2
<b>failures</b> 437:7	366:12 374:18	<b>filing</b> 359:20	<b>Fire/EMS</b> 188:3,5	426:15 433:22
<b>fair</b> 326:10	375:6	<b>final</b> 158:12	191:22	441:3,8 446:15
<b>fairly</b> 136:22 448:5	<b>fell</b> 384:2	<b>finally</b> 256:18	<b>firearm</b> 408:5	<b>follow</b> 335:12
<b>fairness</b> 412:12	<b>felt</b> 368:20	380:7	<b>fired</b> 129:20	354:19 367:8
<b>faith</b> 445:19	<b>female</b> 21:14 45:11	<b>Finance</b> 207:8	<b>fireman</b> 440:19	422:11
<b>false</b> 260:4	69:16 134:6,8	214:19 215:4	<b>firing</b> 373:19	<b>follow-up</b> 68:5
<b>familiar</b> 6:12,20	137:7 162:21	217:12 221:18	<b>first</b> 4:11 5:17 7:11	<b>followed</b> 122:1
77:16,22 390:14	165:11 167:16	222:19 225:15	9:11,19 40:5 41:1	363:7
<b>family</b> 176:21	<b>females</b> 361:2	226:1,17 232:10	41:4,7 71:21	<b>following</b> 179:19
178:18 179:14,15	384:16	235:21 236:11	77:17 84:17 89:7	191:9 202:5 203:6
361:20 384:16	<b>fence</b> 166:1 169:16	241:22 243:1	94:2 96:17 98:10	221:15 222:2
385:13 388:6	171:1,20 372:18	275:11	98:11 99:14 104:1	243:2
418:14	<b>fenced</b> 8:13 113:21	<b>Finances</b> 240:18	104:1 126:16	<b>follows</b> 5:2 89:8
<b>fans</b> 391:14,15	131:16 180:7,18	<b>financial</b> 209:10,17	137:2 138:9	159:1
<b>fantastic</b> 446:9	<b>fenced-in</b> 169:12	218:5 237:7 241:2	158:21 161:6,7,17	<b>food</b> 156:20

<b>foot</b> 206:8 368:16	67:20,20 90:11	193:21 194:12,21	<b>fussing</b> 443:7	366:19,20,21
<b>footage</b> 198:6,10	147:1 153:12	197:18 281:18	<b>future</b> 283:18	369:17 374:6,20
200:19,22 202:10	182:12 212:1	282:2 291:16		375:4,7,14,18
202:11,20 203:12	226:19 327:16	312:4 315:13,16	<b>G</b>	382:12 417:21
356:13 365:5,6	328:7 369:15	315:18 316:12	<b>G</b> 2:12 231:7,9,13	442:15
408:16 417:7	372:19 397:22	345:2 353:21	231:14 232:4	<b>gated</b> 161:16
<b>footing</b> 455:14	446:19 455:15	365:8 366:19,20	<b>garnered</b> 279:18	<b>gatekeeper</b> 76:15
<b>for-profit</b> 429:19	<b>four-month</b> 413:4	366:21,22 388:20	<b>gate</b> 20:21 21:3,3,9	<b>gates</b> 56:18 419:9
432:2,7 446:17	<b>frankly</b> 124:21	411:11 417:10	21:10 23:4,7,9,11	<b>gather</b> 290:10
<b>force</b> 458:17	125:20 277:17,18	420:4 437:19	23:21 24:6 25:1,9	<b>gathering</b> 16:16
<b>forcefully</b> 384:1	277:22 282:17	449:19,21 453:14	25:16 27:2,5,8,10	117:1
<b>foremost</b> 9:19	283:12,13 407:20	<b>Frye</b> 67:9	28:3 31:4,5,7	<b>gauze</b> 43:21,21
<b>form</b> 29:2 140:9	449:1,2 451:20	<b>full</b> 5:6 39:1 89:14	32:17 34:21 35:21	189:11 192:15
178:6 293:4 309:9	452:5	136:22 140:22	36:4,10,11,14,15	<b>general</b> 29:1 76:7
321:2 322:17	<b>free</b> 391:7 426:2	141:3 159:5	36:17,18 37:2	112:3 307:6 312:6
323:1,3,18,20,21	<b>fresh</b> 181:15	209:15 212:14	39:8 41:11,16,17	322:9 331:5,13,14
324:7 327:21	<b>freshen</b> 406:8	228:12 232:8	42:3,8 45:7 46:9	332:1,7,8,10
328:20 329:4	<b>Friday</b> 103:4,11	240:22 290:13	46:11,17 47:13,18	335:13 338:1
331:3 335:12	335:7 337:8,12	371:13 432:22	48:6 50:18 60:2	341:4 344:8
338:10 340:7	393:15 417:8	433:2 447:1,3,5	64:8 72:5 73:11	353:11 401:14
350:4 353:11	<b>friend</b> 120:9	458:6	73:14 76:14 77:20	404:5 425:16
354:6,15 359:11	121:15	<b>fuller</b> 381:19	77:21 78:22 79:11	426:10 430:1,14
360:8 362:14	<b>friendly</b> 15:15	<b>fully</b> 204:6 434:11	79:19 81:11,19	434:1 438:15
396:17 412:22	<b>friends</b> 64:18 65:15	445:14	82:11 83:10 84:19	441:18 450:17
418:10 419:4	124:18 193:14	<b>function</b> 76:15	84:21,21,22 85:9	455:8,13
<b>formal</b> 6:3 187:10	<b>front</b> 8:3,6,17,19	<b>functions</b> 95:14	85:12 86:8,9	<b>generated</b> 379:8
<b>formed</b> 127:21	8:20,21 9:1,3	<b>fund</b> 72:16 136:13	87:12 109:7,8,11	<b>generating</b> 432:2
177:14,22	10:10,13,22 13:9	136:16 137:12	109:20,22 110:2,5	<b>gentleman</b> 22:13
<b>formidable</b> 307:6	13:14,22 19:11	433:16	112:10,18 113:1,2	31:1 62:13 73:20
<b>forms</b> 322:15,19,20	20:2,5 23:7,10,18	<b>fundraiser</b> 173:6	113:2,6 115:1,3	74:1 75:10,13
323:6	26:20 31:1,3	<b>funds</b> 236:11,22	124:1 129:1,6,8	114:22 163:8
<b>forth</b> 127:13	36:18 46:9,10	<b>funeral</b> 72:19	129:17,19,20	164:18 187:1
128:19 153:15	50:18 55:20 56:5	<b>funny</b> 457:22	130:2,7,9,9,12,18	192:7 384:19
171:2	57:15 61:14 64:8	<b>further</b> 31:4 49:14	130:19,20,21	386:9
<b>forward</b> 211:3	65:14 66:8 70:11	60:5 68:3 73:17	131:3,20 132:15	<b>gentleman's</b> 330:2
221:17 232:14	70:14 76:14 78:11	83:12 86:12,12,17	132:16 138:14	<b>gentlemen</b> 20:5,17
246:4 249:1 343:2	78:12 79:19 81:19	87:18 102:8 108:8	144:13 145:6	104:5 108:3
344:17	84:22 85:12 86:6	116:11 135:18	153:12,22 154:11	121:21 161:8
<b>forwarded</b> 240:15	112:10 113:2,3	146:17 150:17	154:14 162:4	162:14,20 385:3
252:16	130:7,8,9,9,11	154:7,15 155:12	163:10 164:19	387:13
<b>found</b> 187:8 192:21	131:3,10 132:15	172:20 174:9	173:17 174:13	<b>Georgia</b> 50:8
193:22 196:16	138:17 143:12	196:7 197:12	184:7 185:4,6	<b>germane</b> 278:1,5
367:22 368:10	144:18 153:11	213:9 218:12,13	186:6,20 187:1	281:11 305:10
380:13 386:8	161:9,20 170:12	259:2 307:14	189:6 190:4,15	<b>gesture</b> 196:15
<b>four</b> 6:2 50:13,15	173:17 175:18	366:15 367:3	193:22 194:12	<b>gestures</b> 17:9 19:5
50:16 52:15 59:11	180:22 184:7	405:10 418:4	363:20 364:1,14	24:14 25:20 30:12
63:7,8 66:21	186:12 190:15	436:10 460:11	364:16 365:16	75:16

<b>getting</b> 31:8 35:21 63:6 79:18 106:22 140:7 144:20 309:1 385:18 390:21 420:20 445:8,10 450:8 451:3	342:1 343:6 344:17 346:1 352:20,21 355:2 376:5 383:19 393:20 395:14 402:9 411:18 415:5 426:15,21 429:10 434:1 439:7 444:4,9 445:15,16 448:4 450:13 460:10	287:19,22 298:11 298:12 299:13 301:12,13,19 308:19 312:2,13 313:14 315:2,4,10 315:11 316:13 320:16 333:19 334:4 335:18 344:5 346:11 352:21 370:13 383:6 387:9,12 394:22 395:3,4 402:8,8,9 421:15 428:12,13 434:20 434:21 438:6 440:17,20 441:4 442:16,19 443:14 443:21 445:9,9 446:22 450:7 452:15	<b>government</b> 4:7 8:14 158:21 332:21 354:20 424:20 425:3 427:5 429:12 431:10 441:11 447:10,18 <b>Government's</b> 406:5 424:19 436:2,8 <b>grab</b> 138:13 <b>grabbed</b> 186:10 383:17,20 <b>gradually</b> 324:15 <b>grasping</b> 456:22 <b>gravity</b> 423:22 <b>great</b> 4:2 223:2 228:11 276:20,22 354:4 369:9 433:9 <b>greatly</b> 244:21 <b>grief</b> 124:19 <b>Griffin</b> 196:11 197:19 201:16 <b>ground</b> 195:21 433:7 440:16 <b>group</b> 21:5,22 23:2 24:8,20,22 25:6,8 26:2,4,7,15 28:15 30:9,13,18 32:15 32:16,17,21 34:16 56:9 62:11 64:17 122:1 123:10,15 126:5 128:11 129:15 139:11 140:11,19,22 141:3,9,10 143:21 144:1,15 145:7 149:11 175:17,20 176:8 178:13 179:1,4,13 180:5 180:13 182:6,11 183:4 361:2,11,16 361:18 362:1,4 363:10,12,17,21 363:21 364:9,13 372:18,20 373:4 384:11,12,13,15	384:18 385:2 390:4 418:8,13,14 418:19 419:12 420:3,5,6,11 421:20 423:12 425:11 435:15 436:5 444:16 <b>groups</b> 122:6 123:6 179:20 182:14 372:6 444:22 <b>guarantee</b> 426:6 <b>guarding</b> 12:15 <b>guards</b> 98:13 <b>guess</b> 52:5 57:2 67:18 86:20 120:8 132:20 137:12 138:20 141:5 149:3 193:16 219:17 282:20 340:19 382:4 395:14 401:5 <b>guidelines</b> 445:21 <b>gun</b> 32:3 435:18 452:14 <b>gunfire</b> 185:20,21 186:2,9,11,16 408:10 424:7 <b>guns</b> 92:13,15 <b>gunshot</b> 32:16 187:8,11,20 188:1 191:10 193:1 <b>gunshots</b> 33:22 <b>guy</b> 9:22 20:22,22 21:21 23:15 25:12 33:5 36:1 115:2 164:22 165:3 167:15,22 168:7 173:21 186:12 189:1 362:5 386:14 <b>guys</b> 20:18 40:9 72:17 182:12 189:5 372:20
<b>GG</b> 300:4 <b>girl</b> 21:12,15 <b>girlfriend</b> 383:15 383:19 <b>girls</b> 20:17,17 <b>give</b> 19:14 43:6,7 109:15 116:10 149:9 156:16,19 197:12,13 200:3 207:22 235:7 298:18 315:13 407:20 423:3 437:14 446:22 460:7 <b>given</b> 13:10 156:18 213:5 351:21 423:22 424:1,1 <b>giving</b> 100:9 133:3 <b>gloves</b> 189:13,14 <b>go</b> 10:7,7 14:19 17:21 31:6 34:14 39:3 40:22 41:13 42:4 65:2 77:9 78:14,16 81:10 82:21 86:3 88:9 105:14 113:11 115:1,14 118:17 135:6 151:3 170:7 173:4 174:15 179:8 192:15 195:11 202:9 207:21 239:5 259:17 282:22 285:14,17 286:3,4 286:6,9 295:11 297:8,14 307:20 312:10 314:9 315:14 318:22 326:8 327:5,22 329:5 338:11	<b>go-go</b> 368:3,6 390:9 <b>go-gos</b> 390:18 <b>goes</b> 284:10 285:21 302:1 306:1 327:3 332:8 340:18 404:8 440:20 441:20 442:4,10 446:13 <b>going</b> 3:3 4:8 6:2 23:2,20 25:8 29:5 33:11,21 36:19 39:6 41:20 42:4,9 42:11,14,17 44:5 44:8 45:7,14 50:15,16 52:11 54:8,8 60:7 62:22 63:8 65:1 67:9,11 82:17 84:2,16 85:14 86:3 95:10 102:21 105:12 108:16,17,19,21 110:16 113:17,18 115:16 118:5 119:6,8 122:2,3 122:11,16 123:17 134:4,18 142:2,9 142:13,15,16 144:13 145:2 147:14 158:8 174:2 176:17 192:6,7,15 195:9 235:3 238:7 254:18 259:17 260:14 277:15,19 278:4 283:12,22 285:2,3 286:6,9	<b>golly</b> 451:4 <b>good</b> 3:10,16 5:5 7:3,20 8:5 16:2,5 17:13,20 34:12 60:15,17 89:3 101:16 109:4 116:2,4 146:20 157:21 158:10,16 158:17 183:21 215:13 217:19 222:16 226:16 228:14 239:5 248:15 256:20 308:12 330:21 355:17,17 368:3 369:17 382:5,7,8 385:22 421:22 434:1 444:13 445:18 <b>Goodwin</b> 214:18 215:1,3,12,14 216:2 232:9 235:18 237:13 244:13 247:1 <b>gotten</b> 407:4 <b>governing</b> 340:20 341:1 342:5	<b>H</b> <b>H</b> 2:13 233:14,16 233:19,20 234:2	

<b>half</b> 63:17,17 68:10 70:14 75:8 96:12 96:13,17 97:14 114:18 156:18 159:16 248:3	116:15 121:19 123:9 127:2 129:14 130:15 131:9,18 133:6,20 134:2 135:11,15 136:8,9 137:17 138:20 170:4,20 175:16 182:8 184:1 186:8 193:11 195:22 198:2 203:5,8 206:19 318:13 329:21 346:17 407:2 420:16 422:1 423:8,12 428:15 436:14 451:22 454:2 456:8	182:14 422:13 441:17 <b>headed</b> 192:18 365:3 <b>health</b> 407:8,15 409:6 448:16 453:22 <b>hear</b> 4:9 24:10 31:9 51:7 76:6 84:20 129:22 144:22 158:9 185:16,21 287:3 309:12 349:12 393:1 429:4 440:21 441:1,2,10,11 <b>heard</b> 125:4 126:1 129:20,21 130:4 130:15,16 186:2,9 260:9,11 276:20 281:14 284:8 292:8 371:21 407:11 427:7 429:13 430:10 433:6 434:10 435:8 445:1 458:13	315:17 321:5 322:13 <b>hearsay</b> 177:4,6,19 298:8,13 <b>heavy</b> 35:22 37:17 <b>heavy-set</b> 39:14 40:1 <b>HECTOR</b> 1:21 <b>held</b> 311:6,9 <b>hello</b> 210:18 241:7 244:20 <b>help</b> 95:1 132:1 189:9 223:1 232:13 321:3 388:5 410:6,8 416:11 <b>helpers</b> 421:1 <b>helpful</b> 234:6 <b>helping</b> 41:3 <b>Henry</b> 234:2 <b>HERMAN</b> 1:20 <b>Hernandez</b> 427:8 428:3 429:2 452:12 <b>heroic</b> 442:4 <b>hey</b> 18:13 422:10 <b>hide</b> 37:8 <b>high</b> 126:11,14 127:1 128:18 421:7,8,10 <b>higher</b> 256:9 <b>highly</b> 304:22 440:12 <b>hire</b> 94:20 367:8 <b>hired</b> 153:6 299:8 <b>history</b> 378:16 385:20 390:22 422:7 451:10 <b>hit</b> 186:16 187:4 191:18 381:15 <b>hold</b> 123:14 186:13 186:14 189:10 437:7 459:9 <b>holder</b> 386:14,19 387:1 <b>holding</b> 33:13,13 <b>home</b> 14:19 444:5,9	<b>honest</b> 147:11 344:4 448:18 <b>hope</b> 4:3 388:1 427:2 <b>hopes</b> 215:19 283:20 <b>hoping</b> 218:4 225:14 <b>horrific</b> 427:4 430:11 441:15 446:17 <b>horrifies</b> 427:1,2 <b>horse</b> 383:21 <b>hostile</b> 26:7 70:6 105:1 280:5 <b>hour</b> 52:5 70:14 75:7 96:11,13,17 97:14 114:18 156:18 157:4 277:19 <b>hours</b> 9:15 160:22 221:16,16,16 243:8,9,10 327:16 328:7 349:22 350:10 351:20 428:10 434:13 459:1 <b>housing</b> 430:18 <b>hug</b> 111:3 431:8 431:20 432:17 <b>human</b> 442:18 <b>hurt</b> 35:3 92:14 130:19 131:7 <b>hyper</b> 180:21
<b>handed</b> 315:12 316:19 <b>handful</b> 258:22 259:22 <b>handing</b> 321:1 <b>handle</b> 148:16,17 393:17 456:10 <b>handled</b> 52:17 339:4 438:6 <b>handling</b> 53:12,14 53:16,18 <b>hands</b> 173:1,2 291:11 393:19 <b>hang</b> 70:13 <b>hanger</b> 386:8,9 387:15 402:15,16 402:18 <b>hanging</b> 75:7 115:10 154:19 171:19 174:8 387:3 <b>happen</b> 190:22 203:4 212:9 342:11,13 343:3 409:8 410:21 418:15 421:11 455:4 <b>happened</b> 16:10 18:8 19:10,22 24:20 30:20 32:5 34:15,19 37:21 40:4 42:5,6 43:12 44:12 45:5 47:5 52:4 58:20,21 59:4,8 67:5 79:18 99:8 102:2 103:9 105:4 106:13 108:12 114:15	<b>happening</b> 72:11 452:5 <b>happens</b> 35:19 94:10 185:15 191:11 420:6,9,12 <b>hard</b> 186:3 389:9 411:22 445:9 450:7 <b>harm's</b> 442:10,19 <b>harped</b> 431:10 <b>Harris</b> 2:3 4:11,21 5:7 49:19 51:8,12 60:16,17 61:1,4,6 61:10,18 62:2 63:8,12,16,22 64:2,6,14 65:7,12 65:16,21 66:2,5,7 68:2,9,21 69:5,21 70:4,15 71:8,11 71:16,20 72:15 73:4,9,13,16,22 74:4,7 75:12 83:17 421:22 441:2,19 442:15 <b>hazard</b> 407:15 <b>head</b> 38:18 43:17 54:21 90:4,6,7 93:20 94:15 146:7 147:1,2 149:10	<b>hearing</b> 1:7,13 3:5 5:20 20:2 32:16 156:1,19 158:6 159:9 200:14 207:21 266:19 283:16 284:3 286:17 301:22 311:6,10,22 316:12,21 317:14 317:17,21 318:4,5 318:13 319:17 321:14 322:19 325:11 326:12,18 327:8 329:12,14 360:3 403:3,4,5 407:3 413:16,17 413:20 414:8 426:18 427:1 448:20 460:18 <b>hearings</b> 310:12,15 310:20,21,22	<b>hide</b> 37:8 <b>high</b> 126:11,14 127:1 128:18 421:7,8,10 <b>higher</b> 256:9 <b>highly</b> 304:22 440:12 <b>hire</b> 94:20 367:8 <b>hired</b> 153:6 299:8 <b>history</b> 378:16 385:20 390:22 422:7 451:10 <b>hit</b> 186:16 187:4 191:18 381:15 <b>hold</b> 123:14 186:13 186:14 189:10 437:7 459:9 <b>holder</b> 386:14,19 387:1 <b>holding</b> 33:13,13 <b>home</b> 14:19 444:5,9	<b>hours</b> 9:15 160:22 221:16,16,16 243:8,9,10 327:16 328:7 349:22 350:10 351:20 428:10 434:13 459:1 <b>housing</b> 430:18 <b>hug</b> 111:3 431:8 431:20 432:17 <b>human</b> 442:18 <b>hurt</b> 35:3 92:14 130:19 131:7 <b>hyper</b> 180:21
<b>I</b>				
				<b>LD</b> 8:8 55:5 <b>idea</b> 101:17 282:7 373:13 422:4 431:11 <b>identification</b> 76:18 197:7 208:5 214:6 216:7,15 219:10 220:5 223:19 224:7 227:7,15 228:20 229:6 231:7,16

233:14,22 237:19	<b>importance</b> 415:10	454:4	42:2,22 43:6,14	252:16 253:4
238:5 243:18	415:11	<b>incidents</b> 9:16	44:1 57:14 64:7	308:19 320:5
247:5 251:19	<b>important</b> 329:18	67:21 68:19 73:6	64:17 69:13,13	356:8,18 407:12
253:11 254:3,21	414:16 417:4	98:8,11 111:7	92:8 103:22 104:1	410:11 424:9
257:1,22 258:5	456:14 458:5	116:20 160:22	106:16 119:12	<b>inherent</b> 428:10
261:9 262:11	<b>importantly</b> 293:8	277:7 279:3	126:17 131:20	434:16
263:9 264:2 265:2	<b>impossible</b> 354:19	280:22 360:16	132:3 134:7	<b>initial</b> 180:21
266:14 267:12	426:7	386:4,6 408:22	140:21 144:1	226:20
268:2 270:18	<b>impression</b> 178:5	415:8,20,22	145:22 148:1	<b>initially</b> 163:16,17
271:14 272:8	186:5	416:22 422:7	151:2 153:13	163:22 310:5
273:1,9 274:10	<b>improper</b> 260:13	424:2 451:13	299:8 329:14	368:1,14 369:12
276:2 288:7 300:3	440:12	452:1 458:2	363:2 387:14	391:6
301:6	<b>improperly</b> 279:11	<b>include</b> 160:4,7	<b>individually</b> 143:21	<b>initiate</b> 287:21
<b>identified</b> 142:21	280:16	243:3 449:17	362:12,17	<b>injured</b> 12:10 22:5
189:8	<b>in/sign-out</b> 213:7	<b>included</b> 210:13	<b>individuals</b> 39:7	30:9 34:6,10
<b>identify</b> 3:8 316:17	<b>inaccuracy</b> 245:13	275:8	40:7 56:1 60:2	37:18 39:13,16
388:18 424:21	<b>inaccurate</b> 246:10	<b>including</b> 339:21	64:15 68:14 98:14	57:3 105:22 107:7
<b>IDs</b> 50:18 85:6	249:10 259:11	416:9	100:2,10 101:6	107:9 166:15
<b>ignored</b> 305:22	260:4	<b>inconsistency</b>	103:1 115:21	168:16 291:11,15
<b>III</b> 339:10,11,13	<b>inappropriate</b>	276:22 281:9	117:2 119:17	<b>injuries</b> 57:7
<b>iJs</b> 74:2	304:22 313:15	<b>incorporate</b> 306:20	122:1 123:15,18	408:11,12
<b>illegal</b> 389:13	314:1 332:16	307:1	126:10,11 139:11	<b>injuring</b> 279:16
430:19	426:9 447:7	<b>incorporating</b>	142:5 145:22	<b>injury</b> 191:15
<b>immediate</b> 304:5	<b>inception</b> 276:14	358:21	363:5 387:20	386:22
436:12	<b>inch</b> 387:2	<b>incorrect</b> 401:20	388:7	<b>inquired</b> 204:10
<b>immediately</b>	<b>incidences</b> 68:6	<b>increase</b> 395:3	<b>indulgence</b> 88:12	<b>inquiries</b> 204:7
126:20 186:22	<b>incident</b> 9:21 49:12	<b>increased</b> 415:22	263:3 272:4 364:6	<b>inquiry</b> 200:5
196:22 198:3	52:4 55:19 98:11	451:14	423:15	226:20 249:16
236:12 237:1	105:13 108:21	<b>incredible</b> 411:22	<b>inefficiency</b> 307:3	281:12 357:2
388:19 392:19	137:2,4 138:2	450:2	<b>inevitably</b> 94:10	402:13 429:2
436:15,16,22	161:6,7 172:4,7	<b>indefinitely</b> 458:17	<b>infer</b> 415:11 422:20	<b>inside</b> 10:2 23:20
437:1 438:5	174:1 175:12	<b>independent</b>	424:10	25:8 26:19 27:9
<b>imminent</b> 284:6	258:22 259:22	181:22 182:1	<b>inference</b> 411:3	32:17 33:6 35:14
303:16 407:8	262:20 289:14	333:6	418:22 420:2	36:10 41:11 44:22
424:13 448:14,16	294:14 295:6	<b>Indiana</b> 209:18	421:4 425:2,18	45:2 47:11,13
451:1 458:10	296:9,11 359:19	394:1 411:19	<b>inferences</b> 447:9	58:21 59:4,7
<b>impact</b> 291:3	360:1,12,15	<b>indicate</b> 52:19	<b>influence</b> 351:3	65:10 73:6 92:10
408:11 416:2	363:19 374:12	75:17 91:15	<b>inform</b> 250:13	96:15 97:11 98:9
<b>impart</b> 95:3	382:20 383:2	296:18	<b>informal</b> 422:19	102:9 104:2
<b>impeding</b> 110:15	384:21 386:7	<b>indicated</b> 5:18	<b>information</b> 101:5	114:19 115:21
<b>implausible</b> 454:16	387:18 389:8	16:14 252:15	101:10 109:16	116:1,22 117:1
<b>implementation</b>	395:1 401:2 403:8	<b>indication</b> 139:21	112:1 167:4	121:21 130:17
424:22 436:19	403:12 407:6	200:4	177:13,15,21	131:15 132:2
<b>implemented</b> 178:1	408:9 416:9 417:6	<b>indigent</b> 430:17	197:11 211:4	134:16,17 135:15
325:16,18	424:5,7 433:5	<b>indirectly</b> 296:11	218:3 221:17	139:3 141:20,22
<b>implementing</b>	443:6 444:14	<b>individual</b> 33:4	225:13 237:6	142:1,4 145:4,6
326:2	445:13,15 453:21	39:10,10 41:14	248:20 251:7	154:4,4 167:18

169:16 170:9,14 172:20 174:14,20 175:9 176:5,6,6,7 202:14 <b>inspector</b> 305:10 <b>instance</b> 82:14 178:21 179:18,21 199:2 220:19 221:6 249:6 340:4 428:16 <b>instances</b> 59:16 204:4 205:22 429:3 <b>instituted</b> 209:22 <b>Instruct</b> 322:6,8 <b>instructed</b> 98:20 <b>instructions</b> 197:13 197:14 <b>instructs</b> 29:7 <b>insults</b> 454:7 <b>intake</b> 92:4 <b>intend</b> 4:14 <b>intending</b> 448:21 <b>interacting</b> 204:4 <b>interaction</b> 195:15 251:14 <b>interactions</b> 179:11 179:13 <b>interested</b> 24:3 25:7 <b>interesting</b> 421:21 <b>interfere</b> 40:8 <b>interject</b> 378:15 <b>Internal</b> 280:1 294:13,20 295:1 296:6,17 357:2 377:8,18 <b>interrogated</b> 296:4 <b>interrogation</b> 295:11 <b>interrogatories</b> 353:16 <b>intersection</b> 194:6 194:20 376:8 382:13 <b>intervene</b> 409:20 416:4	<b>intervened</b> 361:7 <b>intervening</b> 383:12 <b>interview</b> 202:8 357:9 <b>interviewed</b> 138:1 138:5 202:2 <b>intoxicated</b> 76:20 <b>invade</b> 380:17 <b>invading</b> 380:19 <b>invest</b> 395:4 <b>investigating</b> 296:9 <b>investigation</b> 279:7 279:22 291:20 293:10 295:7 296:21 297:17 356:10 357:2 434:12 <b>investigations</b> 377:8 <b>investigative</b> 385:20 415:7 416:14 435:9,11 435:20 442:12 <b>investigator</b> 356:11 415:3 434:10 437:12,14,18,21 440:13 441:5 <b>investigators</b> 197:9 197:19,21 199:21 201:10,22 204:5 <b>invoice</b> 215:20 218:1,6 219:19 222:4,18 225:11 232:8,10 236:9,17 241:8,12 242:5,8 242:14 245:3,6,7 245:13 250:22 251:1 254:9,12,15 254:22 255:1,18 256:5,10,13,18 257:3,6,11 258:1 258:3,20 260:1,2 261:16,19,22 262:13 264:7,10 264:17 265:6,11 265:20 266:3,9 267:16,18 268:4	268:15,16,21 271:2,5 272:13,14 272:16,19 273:5,6 273:13,14,18,21 275:14 345:4,13 346:6,15 347:2,5 348:6 349:9,16 392:3,18 394:14 404:16,18 405:2 432:10 434:9 <b>invoices</b> 207:9 214:22 221:18 223:6,7,9 230:19 244:21 245:2,18 246:10 248:18 249:8 250:20 256:17 259:4,7,18 260:5 262:3 263:4 264:13 268:11,12 275:8,17 278:18 306:7 342:3 343:7 392:10 405:1 430:7,16 431:14 432:21 445:17 <b>Invoices-Yahoo</b> 380:14 <b>involve</b> 91:18 <b>involved</b> 35:4 93:21 94:17 104:8 123:20 124:16 149:7 159:13 162:6 163:1,5 165:18 296:10,22 330:13 333:5 363:18 409:6 417:18 435:21 454:18 457:9 <b>involvement</b> 94:3 94:18,19 162:11 286:15 <b>involves</b> 286:13 <b>involving</b> 55:19 279:4 402:13 <b>irrelevant</b> 283:11 399:20 <b>issue</b> 111:13 138:20 221:18 282:11	284:10,17 287:5 290:7,8 313:11 331:15 350:1,1 359:5,5,6 404:9 409:2 433:12,19 458:22 <b>issued</b> 7:18 215:20 254:16 257:8 <b>issues</b> 59:17 281:22 283:19 284:17 289:18 339:1,21 350:9 351:1 408:2 408:3 409:20 412:8 416:7 422:10 437:1 <b>ITEM</b> 2:5 <hr/> <b>J</b> <hr/> <b>J</b> 2:14 243:19,20 244:1,3 <b>Jackson</b> 225:22 226:2 229:19,21 230:1 231:2,2 <b>James</b> 1:21 159:6 207:2 208:13 209:5 210:2,4 222:12 228:16 230:5,17 232:16 241:2 244:12 246:22 380:12,13 <b>January</b> 210:7 212:21 213:19,19 240:16 241:11,13 241:14 243:2,4 250:6 264:11 269:17 270:2,5 310:8,9 358:1,3 358:16,19 359:14 429:6 432:14 <b>jeans</b> 188:18,19 <b>Jeep</b> 191:4 <b>Jenkins</b> 220:17 222:13 232:19 233:9 234:16 235:6,22 237:14 244:12 246:22 <b>job</b> 54:22 55:5	69:14 80:11 90:18 94:20 299:13 447:16 <b>join</b> 15:3 <b>joined</b> 15:7,10 25:9 25:11 26:2 <b>Jones</b> 1:20 2:3 89:1 89:3,5,16 136:1 146:17,22,22 147:2,6,10,21 148:1,5,8,11,15 148:17,20,22 149:2,9,13,16,19 149:22 150:11,13 151:1,7,10,14,20 152:3,6,9,14 153:1,3,8,11,20 154:1,10,13,21 155:2,6 164:14,16 176:16,18 177:4 422:3 441:2 442:22 <b>Jose</b> 427:8 <b>journal</b> 352:16 <b>Jr</b> 89:5,16 <b>JT</b> 45:11 <b>Judge</b> 445:4 <b>judicial</b> 303:21 <b>July</b> 311:5,8,18,22 316:3,21 317:14 318:5,17 319:18 319:19 <b>jumping</b> 441:12 445:7 <b>Junior</b> 159:6 <b>Junkyard</b> 390:15 390:18 <b>jurisdiction</b> 378:21 379:4,12 <b>Juvenile</b> 90:16 145:11 <hr/> <b>K</b> <hr/> <b>K</b> 2:14 247:5,7,10 247:12 250:9 251:6 <b>Kawan</b> 3:13
--	--	--	--	--

<b>keep</b> 26:22 27:1,1 33:3 234:20 337:2 352:16 412:21	104:1 105:11 108:16,17 109:8 117:17,18,20 122:22 126:18 127:20 129:18 131:22 132:3,4,21 134:3,4,18 136:7 142:7 147:4,10,13 147:14,16 148:18 150:9 154:22 162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	312:13,17 313:11 314:12,17 318:12 319:14 320:2 333:8,18 334:1,3 335:8,22 340:19 340:21 376:17 405:5 411:9,13,19 414:14,18 419:20	<b>lawsuit</b> 279:13 286:10 290:20 291:1,9,10 292:6 294:21 295:12 296:1,7 299:18 <b>lay</b> 156:13 <b>lead</b> 79:2,3 319:2 330:19 <b>leading</b> 28:19 29:12 48:21 49:6 49:8 77:8 85:8 95:7,9 111:9,16 111:18,21 112:4 120:12,17 124:4 124:14 125:20 127:15 128:1,7 179:5,22 180:2 194:14 195:6,7 297:5 332:11 452:7 <b>leads</b> 26:20 407:22 <b>learn</b> 100:21 103:21 121:7 142:3 145:19 164:11 170:16 297:19 299:6 361:15 370:21 <b>learned</b> 54:14,20 55:9 135:13 140:15 141:21,22 162:16,19 165:15 168:22 169:7 176:13 178:5 297:1,15 298:3 299:2 363:9 365:4 367:12 368:4 384:14 386:12 <b>learning</b> 102:8 352:1 <b>leave</b> 14:18 16:7 17:5,18 34:14 46:13 97:13 105:15 112:18 129:10 131:1,11 131:13 134:19,22 167:18 180:12 182:6 416:6	<b>leaving</b> 30:21 32:8 32:22 33:3,11,20 62:4 64:20 71:21 123:19,20 141:15 182:9 385:9 434:18 <b>led</b> 52:17 58:16 110:20 125:1 141:8 282:5 303:5 355:21 356:15 363:19 417:12,21 419:12 424:22 425:20 455:21 457:12 <b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8
<b>kept</b> 32:16,22 454:10	150:9 154:22 162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>kick</b> 383:21	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>killed</b> 72:17	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>kind</b> 7:7 19:1 47:8 52:21 62:12 69:2 70:5 82:6 92:18 93:16 110:4,12 149:14 174:16 184:21 372:20 383:20 390:11 422:5 425:12 426:11 427:3 447:19 450:16 452:3,4 454:21 457:21	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>kinds</b> 7:5 92:11,17 379:10	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>kit</b> 41:20 186:15	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>knee</b> 187:8	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>kneeled</b> 195:17	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17 4:5,10,15,18 5:4 28:22 29:14 49:1,7,14 53:19 56:22 60:9 62:18 66:13 67:3,8,16 74:9,13,19 75:2 76:2,5 77:11 81:8 81:18,22 82:5,8 82:13,19,22 83:12 84:5,8,11 85:18 87:17,22 88:9,14 88:18,22 89:11,13 95:8,12 101:21 102:16 103:5 111:3 112:2,7 120:14,18,22 121:6,10 124:7,9 125:6,11,22 126:3 127:18 128:5,11 128:15 129:9 135:18 155:11,16 155:22 156:5,9,17 157:3,11,16,19 158:10,11 159:3 177:7 178:10 179:6,10 180:4 194:15,19 195:10 195:13 207:18,22 208:3,7 213:17 214:2,8,11 216:5 216:17,20 219:8	
<b>knew</b> 39:10 40:6,6 40:7 43:9 100:19 135:1 183:1 212:2 338:17,20 368:7 393:19 394:8 422:21 441:4	162:13 164:22 165:1 172:10,10 173:1,5,20,22 182:17 188:21 202:12 203:15 206:4 210:1 213:5 228:11 230:16 239:8 248:21 281:12 283:7 284:2,16 286:4 287:5 292:22 298:13,18 303:11 310:17 312:2 324:21,22 325:2 339:6 342:15 343:9 351:2,11 352:3,4,7,17 353:19 354:8 368:5 369:9,19 370:7 372:10 373:8,20 381:2 384:6 385:10 388:9 389:3 392:2 393:3 394:11 397:11 409:2 414:4 415:6,10 419:11 420:12 422:6 429:7 447:2 452:22 453:1 454:14 455:7 457:3 458:14	<b>known</b> 159:13 276:15 <b>knows</b> 393:4 432:22 433:2,3	<b>LEFAND</b> 460:15 <b>LeFande</b> 2:6 3:16 3:17	

220:7,10 223:17	344:7 345:21	355:8 376:5 408:1	321:18 404:20	<b>located</b> 3:6 38:8
224:9,12 227:5,17	348:14,18 350:3	414:20 415:5	412:14 452:20,22	78:10 117:7
227:20 228:18	350:12,19 351:13	417:5 440:21	455:11	209:18
229:8,11 231:5,18	353:10,15 354:17	448:14 450:11	<b>lingered</b> 33:6	<b>location</b> 37:7
231:21 233:4,6,12	354:22 355:6	451:19 452:4,9,11	<b>lingering</b> 27:2 72:7	426:20 436:6
234:2,7,10 237:17	359:10 360:7	455:9	72:8 114:22	<b>log</b> 213:7
238:9,13,20 239:7	362:13,19 375:11	<b>letter</b> 300:8,14	<b>lip</b> 423:4	<b>long</b> 5:22 13:13
239:11,15,18	375:18,21 378:6,8	<b>letterhead</b> 321:8,9	<b>liquids</b> 93:2	39:15 48:2 69:12
247:3,14,17	378:14 380:17	<b>letting</b> 18:15 34:4	<b>liquor</b> 440:2	70:18 89:20 90:10
249:18,22 252:6,9	389:13 395:13,18	35:16 46:19 48:8	<b>list</b> 296:13 405:5	132:11 159:12
253:9,20 254:1	395:21 396:2	108:22 167:8	<b>listed</b> 245:3 296:13	167:21 187:16
257:20 258:19	399:2 400:15	434:21	394:14 404:18	199:10 266:2
260:10,13,16,22	401:13,22 402:5	<b>level</b> 177:6 350:2	<b>listen</b> 282:13	<b>longer</b> 114:19
261:2,4,7 262:6,9	403:21 405:17	<b>levels</b> 350:10	425:11 426:3	444:12 446:20
263:19,22 264:19	406:3,8 424:18	<b>liable</b> 437:8	<b>lists</b> 241:10 245:4	<b>look</b> 43:9 53:6 70:7
264:22 266:12	443:19 444:1,4,8	<b>license</b> 1:7 3:7 6:10	<b>lit</b> 28:8	133:22 142:10
267:7,10 271:12	444:13 460:11	6:14,16 7:4,14,18	<b>literally</b> 303:8	192:20 193:9
272:3,6 275:22	<b>left</b> 4:7 14:16,22	440:6	<b>literature</b> 289:12	195:17 198:4,16
277:15 278:7	15:1,3 26:16	<b>licensed</b> 448:15	<b>litigated</b> 300:16	208:1,21 246:4
285:6,9 286:1,10	27:14 42:3,8	<b>licensee</b> 4:9 158:9	<b>litigation</b> 177:11,11	254:15 256:9
287:7,9,12,20	55:20,20 56:3	<b>lieutenant</b> 43:16,16	285:12 291:4,19	288:20 289:5
288:2,5,12,15,18	71:7 79:15 142:12	43:16,19 46:16	292:15,17 293:5	315:18 324:15
289:1,4,7,19	158:7 187:3 211:6	48:10	301:3 302:4	326:9 380:12
290:2,5,8,11,14	370:10 398:9	<b>life</b> 188:20 408:13	<b>little</b> 10:17 20:19	390:2 402:20
290:18 292:8,18	434:19	440:17	29:5 31:4 62:15	414:2 417:5,11
293:2,8,14 295:2	<b>leg</b> 36:4 38:4,15	<b>lift</b> 77:20,21 78:22	96:14 99:18 113:4	422:13 423:6
295:5,13,17,21	39:11,11 40:10,11	284:4,7 392:13	113:5,8,10 114:19	448:14 451:7,8
296:2 297:6,9,13	41:2 43:3 73:21	<b>lifting</b> 318:1,7	115:17 116:13	453:8 455:5
298:7,22 299:20	74:2 85:17 134:6	<b>light</b> 32:3 260:4	117:3,21,22	456:19 457:10
300:1,21 301:5,20	187:3,6,7 188:17	392:8,10,14	118:10 119:14	<b>looked</b> 20:4 62:14
302:1,8,16,20	189:11 191:10	<b>lighted</b> 28:8	128:22 129:4	62:16 117:1
303:1,13,20 305:6	193:1,15 384:2	<b>lights</b> 118:15,16,17	133:17 137:19,20	179:14 198:6
305:9 306:17	<b>legal</b> 159:5 315:2	118:18,19,21	139:12 141:17	202:11 250:11
307:12,14,18	459:10	140:3 153:19	142:11,15 145:7	<b>looking</b> 22:14
308:5 309:6,19	<b>legally</b> 388:14	154:2 180:10	176:21 180:20	23:12,12 24:1
311:17,21 312:19	<b>legislate</b> 444:20	385:8,10,11,15	254:14 256:9	86:6 185:1,9,11
312:22 313:6,8,12	<b>legislation</b> 457:21	388:13,16 428:18	352:21 378:15,17	185:13 210:14
314:2,19 315:6,14	<b>Lena</b> 226:10	<b>limit</b> 432:9	391:2 445:20	235:5 240:3
316:8 320:19	<b>length</b> 202:10	<b>limitations</b> 439:9	<b>live</b> 409:15	252:20 255:9,10
321:17 322:6,8,16	407:3	439:17	<b>livelihoods</b> 408:12	268:14 269:1
322:22 326:16,19	<b>lengths</b> 27:6,7	<b>limited</b> 287:6	<b>lives</b> 408:11	328:15 385:14
327:20 329:3	369:10	302:14 379:3	<b>LLC</b> 1:6 3:19 88:22	435:8 440:13
331:2 332:12,15	<b>let's</b> 32:19 36:6	<b>limping</b> 12:18	158:12 396:4,11	458:10
332:18 334:8	102:19 301:17	<b>line</b> 53:8 55:9 70:21	396:14,18	<b>looks</b> 86:20 87:1
335:11 336:2	306:16 308:19,20	255:11,13 269:1	<b>load</b> 192:6	255:8 258:15
337:22 338:9	324:2 333:7	283:9,22 304:20	<b>loaded</b> 196:4	283:3
340:7,14 341:3,13	344:16 354:14	312:13 313:15	<b>loading</b> 77:18	<b>loose</b> 32:6

<b>Loretta</b> 226:11	395:10 407:1	<b>March</b> 218:18	159:9 173:11	16:12,14 52:11
<b>lose</b> 299:12	<b>mail</b> 209:8 217:15	219:6 224:21	177:19 210:20	147:20 257:10,13
<b>losing</b> 120:9 238:10	217:22 221:21	225:6 227:2,3	215:21 239:2	274:1 379:1 445:6
<b>lost</b> 199:11	222:7,15 224:21	228:16 231:3	246:6 248:20	<b>meant</b> 63:5 100:4
<b>lot</b> 35:20 57:1	225:11 226:6	235:9,10,14	278:1 283:13	346:20
70:16 73:19 75:5	380:14	236:19 237:5,14	286:11,12 291:8	<b>measures</b> 426:5
101:13 102:1,12	<b>mailed</b> 266:4	240:9 271:7	294:22 300:18	<b>mechanism</b> 432:10
136:6,8,9,19	<b>main</b> 367:1	273:19,22 303:18	302:12 303:9	<b>mediation</b> 345:8
202:22 284:9	<b>maintain</b> 91:12	416:17 424:6	308:7 314:4,8	<b>medical</b> 41:20
308:17,18 309:19	97:10	431:5	315:19 317:2,16	133:1,4 187:14
342:2 344:1,21	<b>maintained</b> 259:14	<b>Marcus</b> 299:19	320:6 327:2	440:19
380:8 420:21	279:19	<b>marked</b> 84:6 208:5	356:16 407:4	<b>meet</b> 430:20 456:2
435:2 452:19	<b>maintaining</b>	214:5 216:7,14	447:6 450:22	457:16
<b>loud</b> 142:7	153:14	219:9 220:4	<b>matters</b> 160:8	<b>meeting</b> 329:14
<b>Lounge</b> 5:16	<b>maintenance</b>	223:18 224:6	310:13 331:15	336:9 459:9
<b>love</b> 369:18	259:11	227:6,14 228:19	438:20	<b>meetings</b> 367:11
<b>Lovell</b> 457:8	<b>majority</b> 125:21	229:5 231:6,15	<b>Matthew</b> 3:17	459:8,13,16
<b>lower</b> 248:3	180:13	233:13,21 234:4	158:11	<b>member</b> 1:19,20,20
<b>Lt</b> 196:10 197:19	<b>making</b> 30:11 46:2	237:18 238:4	<b>McCrea</b> 299:19	1:21,21,22 3:17
201:16	75:16 96:15	243:18 244:2	<b>McDonald's</b>	62:19 81:14
<b>lunch</b> 156:15 157:4	124:12 125:6	247:4,11 251:19	430:13	201:11,15 239:14
<b>lung</b> 386:20	320:12 401:19	252:3,11 253:10	<b>mean</b> 6:13 10:9	270:7 335:5,9
	449:15	253:17 254:3,20	14:18 17:3 36:13	338:14 396:7,14
	<b>males</b> 162:2 361:2	257:1,22 258:2,5	38:6 47:10 51:4	411:7 459:18
<b>M</b>	363:12,21 364:2	260:19 261:9	53:21 62:5 63:5	460:1,4
<b>M</b> 2:15 252:11	435:14,17 436:5	262:11 263:9,16	66:18 110:17	<b>members</b> 3:11 6:12
253:11,13,16,18	<b>man</b> 10:21 11:6,14	264:2 265:2,2,15	111:12 132:19,22	26:4 30:13 141:3
380:12	16:6,9 21:15 22:3	266:13 267:4,12	133:4 140:8 150:1	141:8,9 179:3
<b>ma'am</b> 70:15 75:12	22:4,19 23:3	268:2 270:18	158:5 170:11	238:10 280:12
152:3 370:6,9,20	25:17 37:17 39:14	271:13,22 272:8	181:14 185:19	285:6 294:12
372:1,4,8 373:15	40:2 70:7,9 106:9	272:22 273:8	222:1 235:9	296:4 297:15
380:22 381:6	132:14 181:17	274:5,10,18 275:2	277:18 282:12	298:13 304:2
393:16	189:6 190:16	276:1,9 288:7	304:17,22 305:2	338:22 361:11,13
<b>Macombo</b> 5:15	352:5 373:17	300:3 301:6,14	306:8 314:20	361:20 384:16
50:5,7	<b>manage</b> 420:19	382:22	323:13 328:16,16	423:16 436:15
<b>Madam</b> 3:10,16	<b>management</b> 7:1	<b>Martha</b> 220:17	329:16 332:5,8	448:7 450:4
88:18 158:10	7:15 144:9	222:13 232:19	336:21 340:18,20	<b>memorial</b> 178:20
213:17 216:5	<b>manager</b> 108:15	233:9 234:16	350:16 364:21	362:7
219:8,15 223:17	159:20 334:20	235:6 237:14	376:5,6 380:11	<b>memorializing</b>
227:5 228:18	339:21 396:15,20	244:12 246:22	383:5 386:21	103:2 173:9
231:5 233:4,12	<b>mandate</b> 428:11	<b>Maryland</b> 90:22	408:9 433:3	<b>memory</b> 280:8
237:17 239:15	<b>mandates</b> 313:1	91:2,3	439:22 449:9	331:7 332:2,5
243:17 247:3,15	<b>manner</b> 102:6	<b>material</b> 195:3	450:2,6 454:8	333:9
251:18 253:9	194:22 355:2	<b>materially</b> 303:15	456:9,9 457:22	<b>men</b> 352:5,5 384:11
257:20 266:12	<b>mannerisms</b> 181:3	<b>matter</b> 1:5,15 3:14	<b>meaning</b> 52:9 69:8	384:14 443:7
271:12 274:9	181:11	3:19 5:19 69:19	76:20 130:7	<b>mental</b> 92:6
299:21 315:6	<b>manual</b> 53:22	88:16 137:13	<b>means</b> 6:22,22	<b>mention</b> 213:9
375:11 391:18				

<b>mentioned</b> 61:19 126:15 181:5 371:15 404:4	48:22 49:16 51:6 51:10,16 54:4,7 60:7,10 62:21 63:3 67:7,11,15 67:17 68:4,17 69:1,18 70:3,12 70:22 71:4 73:18 74:1,5,11,18,22 75:4,20 77:9 81:12,16,21 82:3 82:7,12,17,20 83:14,19 84:12 86:1 87:16,20 88:2,7,13,20 89:2 89:9 95:10 102:13 102:19 110:22 111:2,10,14,16,20 112:6 120:13 121:4 124:8,22 125:3,9,13 127:16 128:3,8,13 129:3 129:7 135:20 146:18 150:18 151:5,8,11,16,22 152:5,7,10,16,19 154:17,22 155:4,9 155:14,20 156:3,7 156:14 157:2,5,9 157:14,18,21 158:4,15 178:8 179:8 180:3 194:17 195:8,11 207:20 208:2 213:22 214:3,10 216:11,19 219:13 220:1,9 223:22 224:3,11 227:11 227:19 229:2,10 231:12,20 233:18 234:5,9 238:1,7 238:11,18,21 239:4,9,13,17 243:22 244:6 247:9,16 249:20 252:1,8 253:15,22 255:16 256:21 260:8,11,14,17	261:1,3,6 262:8 263:14,21 264:21 266:18,21 267:1,9 267:22 269:4 270:16 271:19 272:5 274:15,22 276:6 277:13 281:15 284:1 285:8,13 286:2 287:2,8,11,14,16 288:4,21 289:3,22 290:3,7,9,12,16 292:10,21 293:7 293:12 295:3,9,15 295:19,22 297:7 297:11 298:10,21 299:22 300:13,19 301:2,11,17,21 302:6,13,18,21 303:10,17 305:4,8 306:15 307:11,13 307:16,19,22 308:9,12 309:10 309:14,21 310:1 311:19 312:8,21 313:4,8 314:10,14 315:1,7 316:16,22 317:3,6 320:22 321:19 323:4 327:22 329:5 331:6,11,17,20 332:4,13,17 333:7 333:11,21 334:2 335:17 336:4,8 338:4,11 340:8 341:5,8,15,19 344:16 346:1 350:5 351:9,15 354:13,21 360:9 362:18 367:4,7,14 367:17,20 368:9 368:22 369:5 370:3,7,16 371:1 371:4,8,14,20 372:2,5,9,15 373:11,21 374:3,8 374:15,19 375:2,9	375:17,20 376:1,4 376:10,15,22 377:5,12,15,19,21 378:4,7,9 379:22 380:6,20 381:1,5 381:7,11,14,18,21 382:2 391:19 392:4,7,20 393:2 393:11,14 394:10 394:15,18 395:11 395:16,19 398:22 399:16,19,21 400:2,5,12,16,20 401:21 402:2,7,16 404:10,13 405:12 405:14,21 406:6 406:10,16,20 424:16 443:17,21 444:2,6,10 448:1 448:6 458:20 459:19 460:2,2,5 460:14 <b>Miller's</b> 429:2 <b>mind</b> 101:22 102:3 219:21 312:9 <b>mingled</b> 25:1 <b>minimal</b> 413:11 449:18 <b>minimums</b> 449:18 <b>minute</b> 13:16 20:20 31:8 39:20,21 40:12 51:6 238:8 238:22 290:10 308:3 312:9 351:8 351:8 372:16 448:4 <b>minutes</b> 71:17 97:20,21 156:22 287:10 308:2 419:22 423:17 424:14 443:22 448:3 <b>misconduct</b> 279:8 303:4 <b>missed</b> 151:8 <b>missing</b> 399:4 <b>mission</b> 447:7	<b>mistake</b> 263:1 346:8,17 <b>mistaken</b> 401:3 <b>mistakenly</b> 401:9 <b>misunderstood</b> 375:12 <b>Mituka</b> 173:10 <b>mixed</b> 388:12 <b>mixing</b> 389:7 <b>modification</b> 256:16 <b>moment</b> 36:7 42:1 43:13 184:17 288:19 312:1,7 436:17 440:6 <b>Monday</b> 203:6 209:16 <b>money</b> 307:8 358:12 388:6 392:1 393:6,7 412:18 433:12 434:20 <b>money-making</b> 399:13 <b>monies</b> 278:12 281:22 282:1 <b>monitor</b> 97:6,10 98:2 <b>monitoring</b> 31:7 <b>month</b> 68:10 245:8 342:7,8 <b>months</b> 68:11 251:4 357:11,14 371:5 412:10,10 431:14 451:14 455:15 <b>morning</b> 3:10,16 5:5 7:21 9:15 10:19 61:16 62:9 98:6 99:15,20 103:3,10,11,12 160:11,15,22 201:7,14 204:12 205:2 215:13 222:16 248:15 278:10 392:17 434:19 435:6
--	--	--	--	--

<b>motion</b> 449:3 459:20,21 460:6	358:2,11 359:8,16 377:8 392:1	314:1 334:9 409:19 422:8	72:13,14 75:11 115:12 116:21	<b>notes</b> 82:6 357:16 359:20
<b>motivations</b> 283:6	399:14 415:16	457:19 460:10	135:8,16 136:9	<b>notice</b> 20:10 128:21 141:12,12 150:2
<b>motive</b> 433:14 447:7	416:18 449:16	<b>needed</b> 149:18 151:18 180:16	147:8 150:10	190:5,22 286:16
<b>motives</b> 286:7	<b>Mpras</b> 3:22	192:5 196:12	152:22 189:18	303:21 323:19
<b>MOULTON</b> 327:5	<b>multiple</b> 399:6,7 415:2	197:11 198:5	198:13,18 201:18	358:11 372:6
<b>mouth</b> 450:20,20	<b>music</b> 118:12 119:2 119:4 131:12	202:17 246:10	202:13 296:16	408:20 413:3 460:7
<b>mouths</b> 452:8	139:12,16 142:7	296:21 308:1,2	297:3 311:1 320:8	<b>noticed</b> 36:3,4 38:4 114:21 116:22
<b>move</b> 70:18 72:9 83:6,16,18,20	149:6 409:18	<b>needing</b> 44:3	388:22 409:9,21	121:22 123:18
232:14 239:20	425:12 426:3	<b>needs</b> 338:3 429:20	416:9 426:16	131:20 141:14
248:22 301:17	427:3 450:16,21	<b>negative</b> 223:2 246:3 369:4	436:11	142:13 171:19
306:16 314:1	452:4	<b>negatives</b> 397:19	<b>nightclub</b> 8:4,7 32:14 40:15 45:17	173:7 190:3
333:8 338:3 341:7	<b>muzzle</b> 32:2	<b>neglect</b> 307:4	45:18,19 79:13	238:19 361:1,1
343:2 459:9	<hr/> <b>N</b> <hr/>	<b>neighborhood</b> 122:10 428:1	80:16 81:3 83:3,4	<b>notification</b> 206:20 207:1,6,11,17
<b>moved</b> 227:8 228:21 258:7	<b>N</b> 254:4 256:13	<b>neighboring</b> 199:17 200:21	86:15,16 89:19,22	210:19 432:11
302:17 331:9	<b>N</b> 257:21 258:1,8,11	365:5,7,9 372:14	90:8 95:15 279:15	<b>notified</b> 131:10 207:7 209:10
<b>movement</b> 91:14 149:5,8	260:20 345:1,4	375:5	280:17 289:14	240:17 431:17
<b>movements</b> 91:14	<b>N,O,P</b> 2:16	<b>neither</b> 50:11 332:10 396:13	441:14 442:14	<b>notify</b> 57:19 385:1
<b>movie</b> 427:18	<b>N.W</b> 1:14 209:18	64:1 73:1 143:9	447:13	<b>November</b> 221:14 245:10 250:22
<b>moving</b> 128:22 129:5,7 139:11,16	<b>name</b> 5:6,7 38:20 39:1 89:15 159:5	143:10 151:8	<b>nightclubs</b> 434:4,6	251:1 254:4,13
149:6 150:2	299:17 316:14	169:18,18,19	<b>nights</b> 151:19 327:15 328:7	261:20 263:5
208:22 302:22	<b>names</b> 101:7	219:21 232:10	<b>no-show</b> 446:2	<b>null</b> 411:7
428:19 438:2	<b>narcotics</b> 51:13 76:21	322:4,7 337:3,6	<b>no-shows</b> 431:17	<b>number</b> 3:5,7 72:13 152:11
<b>MP</b> 146:3	<b>narrow</b> 27:11,13 53:20	337:18 338:6	<b>non</b> 277:20	210:21,22 211:7
<b>MPAC</b> 1:6 3:19 88:22 158:12,13	<b>national</b> 368:21	339:8 386:6	<b>non-musical</b> 149:8	211:10,12,15,16
396:3	<b>nature</b> 91:16 99:19 99:22 100:4	387:21 393:18	<b>non-existent</b> 429:11	215:19 224:4
<b>MPD</b> 59:12,18 60:3 66:4,11 67:22	125:20 152:8	429:9 433:18	<b>nonsense</b> 451:21	236:6 277:1,2
147:9 190:5 207:4	162:10 164:11	434:8 441:17	<b>Nora</b> 254:4	317:4 334:7 346:6
208:14 209:9	178:12 342:4 401:6	452:3 455:4,21	<b>normal</b> 52:15 58:1 64:13 72:22	346:15 355:15
215:15 217:21	<b>NE</b> 1:7 3:7	456:5,7	149:20 206:5	379:7 427:21
221:9 225:10,10	<b>near</b> 13:9,13 162:5	<b>new</b> 155:6 202:20 221:18 222:3	<b>normally</b> 16:11 50:17 59:12,13	436:19 452:17
226:11 246:3	<b>necessarily</b> 427:13	294:22 432:1	97:5 139:10	453:1 459:11
267:16 283:9	<b>necessary</b> 7:13 30:16 150:6 152:2	<b>nexus</b> 435:4 447:12	148:12 154:2	<b>numbers</b> 254:22 255:1 275:15
285:18 286:8	413:22 458:6	<b>nice</b> 4:3	189:6 352:2,9	277:21 352:18
291:12 309:16	<b>need</b> 19:17 50:14 197:1,10 248:22	<b>NICK</b> 1:19	382:11,18 388:16	391:8
310:2 325:22	250:8 304:12	<b>nickel</b> 455:16	390:20,21	<b>numerous</b> 69:5,16
327:15 328:6	306:18 309:11	<b>night</b> 10:3,11 11:12 16:13 48:14,17	<b>note</b> 57:6 292:7 298:19 315:3	<hr/> <b>O</b> <hr/>
330:10 333:16		49:11 52:12 63:15	354:11 424:3	<b>O</b> 254:21 255:10
337:6,13,20 338:8		66:4,12 69:12	431:12	
342:5,10,15 345:8			<b>noted</b> 297:14 314:3 321:20 355:4 424:5	

258:3,8,11 260:20 345:1,8 <b>o'clock</b> 55:18,21 56:8,8 434:18 <b>object</b> 62:19 110:16,22 111:1 258:12 278:6 294:22 386:11 <b>objection</b> 28:19 29:1,11 48:21 49:6 54:9 66:13 67:3 77:8 81:5 84:11 85:18 95:7 101:20 102:21 120:12,17 124:4 127:15 157:6,7 177:3 179:5,22 180:2 194:14 207:20 213:21,22 216:10 219:16,22 219:22 227:10 231:11 247:8 251:22 253:14 263:13 266:19,20 266:21 271:18 274:14 277:12,17 289:16 292:2,5,9 292:13 294:18 297:5 298:6,9 300:11 314:3 315:3,4 321:17,19 321:20 322:16,22 326:16,20 327:20 329:3 331:2,3 332:14 335:11 336:2 338:1,9 340:7,14 341:13 344:7 345:21 350:3,12 353:10 359:10 360:7 362:13 398:20 401:14 403:21 <b>objections</b> 88:6 219:14 224:1,2 229:1 233:17 237:22 243:21 258:11 266:22	276:5 <b>objective</b> 451:7 <b>objects</b> 93:1 301:9 <b>obligation</b> 413:1 426:4 <b>obscene</b> 432:2,7 <b>observation</b> 145:20 <b>observations</b> 110:18 146:5 <b>observe</b> 11:14 12:1 26:17 28:12 104:17 110:2 114:1,4 126:22 127:13 162:1 165:21 166:4,9,12 168:3 171:13 175:8,19 181:12 183:13 189:22 190:7 422:18 <b>observed</b> 11:18 37:16 39:13,16 41:4 118:2 128:17 139:2 162:2 176:2 179:12 181:11 183:12,20 199:1 <b>observer</b> 181:12 <b>observing</b> 100:22 101:1,1 176:8 184:21 <b>obstructing</b> 14:9 <b>obtained</b> 372:14 <b>obtaining</b> 200:18 <b>obviously</b> 52:1 145:10 282:3 308:17 328:17 331:4 408:5 <b>occasions</b> 205:20 413:15 <b>occur</b> 176:15 402:18 403:11 423:19 <b>occurred</b> 59:20 71:10 73:11 75:11 98:8 124:19 136:7 137:2 138:16 154:8 177:1 200:22 258:14	280:14 286:21 289:14 291:21 294:4 302:11 330:4 360:2,6 372:11 376:19 379:21 386:6 402:21 403:11 410:7 424:2 425:1 428:22 435:13 445:13 454:1 457:2,13,13 <b>occurrence</b> 306:22 <b>occurring</b> 182:2 280:20 304:4 <b>occurs</b> 64:19 230:17 <b>October</b> 221:13 245:4 250:21 254:17,17 255:19 255:20 303:12 357:14 358:3,18 377:9 378:18 403:6 <b>offend</b> 112:3 <b>offense</b> 281:21 354:5 450:14 <b>offensive</b> 425:13 426:14 430:11 441:15 447:21 <b>offered</b> 8:14 156:12 177:18 440:10 <b>offering</b> 211:11 <b>offers</b> 439:12 <b>office</b> 6:15 7:1 198:4 207:8 209:10,17 214:18 215:4,18 217:13 218:2,4 221:17 222:18,21 225:13 225:15,22 226:17 232:9 235:19,21 236:10 237:7 240:18 241:1,22 242:22 259:9,20 260:6 275:10 294:13 296:5,17 330:1,2 338:20	393:20 394:7 398:12 399:14 431:2,18 432:11 450:17 <b>officer</b> 7:9 45:10,12 45:13,22 46:15 48:12 59:18 60:21 66:7 80:7,14 81:2 83:2 90:19,20 91:5,9 92:4 138:12 190:20 212:16 237:7 241:2 242:1 243:1 259:10,21 260:7 275:11 279:14,17 291:12 299:12 330:10 382:15,17 383:7,19,22 394:4 396:14 417:14,19 427:8 428:3 429:2 431:3,18 440:18 452:12,20 <b>officer's</b> 7:14,15 299:17 <b>officers</b> 20:8 45:9 59:12 61:8,8 130:21 133:10 190:5 209:11 210:22 211:1,15 211:16 212:1 215:16 236:6 243:6,7 245:1 249:5 277:1,2,8 277:16 278:4,9,21 279:4 280:2,3,5 280:19 281:4,7 282:7 283:10,10 294:8 296:10,13 297:22 298:4 303:5 304:6 305:17 307:4 325:19,21 327:14 328:6 329:9 338:22 351:20 352:14,16,18 375:14 393:22 396:11 397:21,22	398:4,8,18,19 399:7,8 408:15 411:11 416:3,4,20 433:21 434:5 446:16,19 <b>Offices</b> 209:17 <b>official</b> 323:19 <b>oh</b> 38:10 81:21 92:20 100:6,8,8 147:6 165:12 172:22 218:13 223:12 238:9 239:13 254:17 288:12 289:3 302:18 341:19 344:22 347:3 374:10 375:17 395:14 396:19 421:20 446:21 <b>okay</b> 3:15 4:2,12,19 5:22 6:3 7:17 9:5 9:10,14 10:18 11:7,13 12:1,20 13:1,4,8,17 14:6 14:15 15:6,14 16:2 17:12,20 18:8,11,19,22 19:8,10,19 21:17 22:7,18 23:1 24:10,13 26:15 28:11,15 29:8,10 29:13,16,17 30:5 30:8,11,20 31:22 32:20 33:19 34:12 35:12,18 36:6,22 37:10,15,20 38:22 39:3,21 40:4,20 40:22 41:13,19 42:8 43:12 45:5 45:19,22 46:4,19 46:22 47:3,5,17 48:8 49:16 50:10 51:2,16 53:7,7 55:2,8 56:2,11,22 57:22 58:3,14 59:10 60:5,7 61:12 62:7,22
--	---	---	--	--

63:3 64:3,10 66:3 67:15,17 69:1 70:3,22 71:18,21 73:2 74:18 75:4 75:20,22 76:12 77:3 78:15,18,20 79:1,4,17 80:13 80:21 82:3,7,12 82:17,20 83:14,20 84:8,12 85:3,11 85:14 86:1 87:5 87:10,14,16 88:13 88:20 89:2,9,17 90:13,17 91:3 93:19 94:2,6 95:18 96:5 98:1,5 99:10,17 100:21 101:13,16 102:19 104:7,15 105:3,9 105:16,20 106:8 107:7,11,20 108:1 108:12 109:15,18 110:1,15 111:14 112:13,17 113:10 114:15 115:5,22 116:6,10 117:7,10 117:19 118:2,2,15 119:4,15 120:6 121:16 122:15,22 123:9 125:9 128:3 128:13 129:2,8,13 130:10 131:9,18 132:18 133:3,6 134:2 135:6,13,20 136:11,18 137:22 138:7,15,19 139:14,20 140:2,6 140:13,17 141:2,8 142:1,20 143:2,9 143:11 144:17 145:2,7 146:3,7 146:18 147:18 148:18 149:3 150:18 151:17 152:7,10,16,19 153:18 154:6,17 155:9,14 156:14	157:2,5,18,22 158:4,15 159:12 160:7,10,20 161:22,22 163:15 163:19 164:9,21 165:13,20 166:15 167:3 168:9 169:3 169:6,10 170:2,13 170:20 172:19 173:3,13 174:9,12 175:2,8,11 176:1 178:8 180:18 182:4,8 183:19,21 184:11 185:9,15 188:12 191:3,9 192:4 193:8 195:8 195:22 196:6 199:10,19 200:12 200:17 201:4 203:7,21 204:3,9 204:19,22 205:6,9 205:14 207:5,16 209:3 211:13 212:16 215:5,22 216:5,11 217:5,17 220:1 221:4,12 223:13 224:3 225:2,5 226:14 227:11 228:9 229:2,17,21 230:8 231:12 232:20 233:12,18 234:18 235:5,11,15 238:1 238:9,22 239:5,13 240:1,3 243:13 246:20 247:9,20 249:21,21 250:5 250:13 251:13,18 252:1,20 253:15 254:18 255:4,9,18 256:4,8 257:16,20 260:8,17 261:1,13 262:6 263:8,14 264:9 265:10,13 266:18 267:21 268:14,18 269:12 269:16,19 270:4	270:15 271:19 273:12,16 274:15 275:17 276:6 277:6,13 284:1,19 285:13 286:3,5 287:8,14,20 289:3 289:7 290:3,16 291:7 292:1,11 293:7,12 296:1 297:7,10 298:10 298:21 300:13 301:2,11,13 303:10 306:15 307:11,13,16,21 308:9,12 309:4,14 309:21,22 310:1,6 310:10 311:5,14 312:8,11,21 314:19 315:1,2,6 315:7 317:3,6,12 318:16,22 319:10 319:16 320:1,4,15 321:7,21,22 323:8 324:2,11,17,17,20 325:7,20 326:4,10 326:14,14 327:6 330:20 331:11 332:17 333:7,10 333:11,19 334:3 334:19 335:17 336:4,8 337:16 338:15 339:12,19 341:7,8,19 342:13 343:1,21 344:16 346:10,13,16 347:11 348:4 349:5,10 351:15 352:8,20 354:13 354:21 355:11 356:3,14,22 357:13 358:16 359:12 360:15,21 362:21 364:8 366:3,11,18 367:2 367:4,6 371:14 372:2,5,9 373:11 373:21 374:3	375:9 376:4,10 377:5,6,15,19 378:9,11 379:22 380:6,7,8 381:7 381:14,18,21 384:4,9,22 385:18 386:12,16 387:16 390:17 391:3,17 392:7 394:10,15 394:18 395:11 396:13,20 397:5 397:15 400:1,16 400:16,20 401:11 401:21 402:2,18 402:21 403:2,10 403:18 404:10,13 405:7,14,21 406:6 406:10,16,20 414:18 424:16 438:1 444:2,4,6,6 444:8,10 448:6 458:20 460:5 <b>old</b> 100:15 369:20 <b>older</b> 391:14 <b>olds</b> 388:12,12 389:4,7 <b>once</b> 23:3 26:2 30:21 44:14 45:8 81:10,19 82:10 83:7 97:13 99:1 116:11,12 130:15 130:16 134:14,22 169:10 170:2 171:7 180:6,8 181:14 188:14 196:7 259:7,15 281:2 339:5 363:14 371:6 397:20 419:6 432:16 443:11 445:13 447:2,3 <b>one's</b> 454:19 <b>one-way</b> 9:9 <b>ones</b> 23:6 84:6 363:6 371:21 <b>ongoing</b> 285:11 291:5 292:12	296:20 380:5 437:5,6 <b>open</b> 36:15 78:13 78:13,14,16 79:12 96:18 97:15 162:21 236:4 368:15 394:22 459:8,12,15 <b>opened</b> 205:12 310:5 368:1,14 373:10,14 <b>opening</b> 78:7 313:9 <b>operate</b> 314:13,18 450:5 <b>operated</b> 400:10 <b>operates</b> 411:1 <b>operating</b> 159:21 <b>operation</b> 159:18 340:3 399:14 414:1 439:17 <b>operations</b> 160:1 160:16 341:1 407:7 411:13 413:14 414:17 424:11,13 434:13 446:14 457:12 <b>opinion</b> 66:19 167:11,14,20 401:3 445:4 <b>opinions</b> 177:14 <b>opportunities</b> 423:18 <b>opportunity</b> 11:13 28:7,11 93:21 98:22 99:13,18 103:20 106:8 110:1 123:12,14 135:7 163:3,12,19 165:21 166:3 168:2,18 169:3 171:12,21 201:8 210:10 222:6 289:4 326:21 <b>opposed</b> 165:8 343:12 <b>opposite</b> 185:13 437:11 438:12
--	--	---	--	---

<b>options</b> 413:6	138:12 139:10	359:15 392:1	348:8,22 349:1,5	<b>particular</b> 7:5
<b>oral</b> 331:1,7,14	141:11,16,22	393:6,7	349:6,10,18	12:15 123:17
<b>orally</b> 331:8	142:1,14,17	<b>owed</b> 212:3 278:12	371:12 405:6	147:7 198:13
<b>orator</b> 178:2	143:19,21 146:1	358:13 359:1,3,7	412:16,17 432:21	205:21,22 268:5
<b>order</b> 91:12 97:10	153:22 154:3	<b>owes</b> 209:13	433:2 447:1,3,4	268:20 296:16
157:20 161:5	161:15 163:10	<b>owner</b> 16:13,21	455:15,19 458:6	305:11 349:9
248:22 254:19	164:6,19 165:21	40:12,14 45:14,16	<b>pair</b> 188:19 189:14	350:11 352:17
292:12 293:1	169:12,15,22	55:1,10 57:19	<b>pants</b> 9:22 43:3	353:18 378:16
314:8,20,21 409:5	171:1,4,8,14	158:13 159:21	187:7 188:16	379:20 387:14
410:8 416:6	173:17 174:13	197:8 283:16	<b>paper</b> 446:9	388:21 409:5
420:21 438:16	175:20 176:10	310:11 330:15	<b>papers</b> 379:10	425:9,10,11
<b>ordered</b> 205:15	180:7,8,14 181:12	396:3 410:19	<b>paperwork</b> 210:21	429:10
<b>orderly</b> 423:8	181:15 182:5	411:8 441:19,22	211:15 236:8,16	<b>particularly</b> 278:11
<b>orders</b> 313:13,16	185:4 186:6,17	<b>owner's</b> 440:11	296:15	305:9
313:22 414:4	278:1 280:13	<b>ownership</b> 441:3	<b>paramedics</b> 43:19	<b>particulars</b> 191:15
439:4	326:20 364:14,15		43:20 44:1 45:8	368:8
<b>ordinarily</b> 92:12	372:7 382:20	<b>P</b>	<b>park</b> 155:1,2,7,8	<b>parties</b> 3:8 180:15
98:22 99:4	385:5 395:6 410:7	<b>P</b> 257:2,18 258:6,9	382:20	296:22 449:12
<b>ordinary</b> 93:7	410:8 418:9 419:9	258:12 260:20	<b>parked</b> 27:14,15	<b>partner</b> 318:20
379:15	419:9 443:12	345:2,14	<b>parliamentary</b>	330:18 333:5
<b>ore</b> 379:19	<b>outstanding</b> 207:9	<b>P-R-O-C-E-E-D-...</b>	238:15	<b>party</b> 72:20 118:19
<b>organization</b> 226:4	230:14 240:19	3:1	<b>part</b> 9:5 12:16	290:19,22 291:20
<b>original</b> 235:13	246:13 248:17	<b>p.m</b> 88:17,17 158:2	26:15 78:11,12	346:17 405:18
256:12 258:1	250:21 347:21	158:3 239:2,3	84:6,9 145:14	<b>pass</b> 51:21
379:8	358:1,5,12 380:14	308:7,8 406:14,15	178:17 188:9	<b>passed</b> 23:4 100:10
<b>originally</b> 255:19	404:7	460:18	208:15 285:10	100:12 185:7
347:11	<b>over-billed</b> 242:15	<b>P.S</b> 211:5	294:21 304:14,19	460:6
<b>our's</b> 387:22	<b>overall</b> 159:20	<b>packed</b> 72:15	321:14 338:13,13	<b>passing</b> 59:2
<b>outburst</b> 180:21	<b>overcome</b> 124:18	<b>pad</b> 429:11	353:2 355:9,20	103:16 208:3
<b>outbursts</b> 179:16	<b>overlapped</b> 381:17	<b>page</b> 2:5 217:6	356:9 370:2	<b>pat</b> 77:1
179:17	<b>overlooked</b> 399:10	221:5 224:20	376:11,13 377:10	<b>pathway</b> 27:4
<b>outcome</b> 67:5	<b>overrule</b> 54:9	229:18 240:4	379:7 407:10	<b>patience</b> 308:16
351:4	102:21 195:9	248:3 250:2	413:1 416:15	<b>Patricia</b> 217:10,11
<b>outlet</b> 433:22	336:4	252:21 315:13,16	439:2,8,13 453:17	217:15 218:16
<b>outside</b> 21:5,9,10	<b>overruled</b> 62:21	315:18 321:7	453:18 455:22	225:7,8 226:4,5
24:6,22 33:7 39:8	77:9 178:9 179:8	334:13 357:21	456:2 457:17	226:14,18
41:16,17 56:18	290:17 292:9	358:8 379:6 435:8	<b>participant</b> 163:21	<b>Patricia's</b> 226:20
58:11 59:13 66:16	296:1 297:8 323:4	435:10	<b>participate</b> 285:10	<b>patrol</b> 398:8
81:4,10 82:11	327:5,22 329:5	<b>pages</b> 315:11	335:20	411:15 416:21
83:4,9,10 97:22	338:4,11 341:20	<b>paid</b> 230:16 236:11	<b>participated</b> 279:6	455:8
98:12,12 109:21	346:1 360:9	236:22 240:22	302:9 333:2	<b>patron</b> 69:7 85:16
110:2,5 113:18,19	362:18	251:2 259:1	<b>participating</b>	330:10 383:12
114:18,21,22	<b>overseeing</b> 160:16	265:11 271:7	332:22	417:12 421:14
115:2,6,14 123:10	<b>oversight</b> 445:21	273:14,20 275:19	<b>participation</b>	<b>patronize</b> 425:4,7
123:16 130:1,19	<b>overtime</b> 215:16	281:22 282:1	279:21 293:10	<b>patrons</b> 8:9,9 17:16
130:20,21 131:3	296:14 358:2,14	305:15 306:3	295:7 297:17	18:1 23:6 33:10
132:5,10,16	<b>owe</b> 345:5 359:14	343:10 347:21,22	305:17	53:12,14,16,18

55:6 56:12 57:18 59:17 63:11 72:13 77:6 85:7 97:12 155:1 163:4,21 175:3 368:11,20 371:16 385:6 408:16 409:3,6 415:14,18 417:2 419:18 421:8 424:12 425:17,21 426:1 451:10 453:19 <b>Pause</b> 347:9 <b>pay</b> 147:13 153:6 223:7,9 257:3,5 257:10 260:2 266:8 270:12 271:2,6 284:21 370:17 393:5 455:3 <b>paying</b> 22:15,15 281:4 431:4 434:6 <b>payment</b> 206:21 209:15,18 217:21 219:2 225:10 226:17 257:14 258:7,15 274:2,7 306:10 339:4 343:18 345:13 348:5 359:8,16 393:18 394:3,7,12 404:7 410:18 <b>payments</b> 209:11 218:2 225:12 259:3 282:3 339:6 342:6,8 343:5 344:2 358:17 392:9 394:1,8 403:19 412:7 413:4 431:4 <b>pays</b> 433:15 <b>peace</b> 72:21 101:8 <b>people</b> 14:12,22 15:2,3,7,10 16:12 17:5 18:15 20:9 20:11,13,15 22:16 23:2,13,16 25:14	25:18,21 26:2,20 26:22 28:13 30:1 30:6 32:8,15 33:20 34:4,14,16 35:14 36:19 37:10 45:6 46:13,17 50:17 55:17,20 56:12,15,18,19 57:2 58:17 59:7 70:20 72:6,10 76:16 79:19 81:4 81:10 82:10 83:3 94:20 96:7 97:8 97:11 99:5,14 100:12,15,22 101:13,22 102:6,9 103:14,16,19 104:8 113:11 117:12 118:3 120:1 122:13 123:10,21 127:1 128:12,17 130:17 130:20 133:11,19 134:19,21 136:20 141:19 142:2,17 143:11 144:11,18 144:20 145:2 149:7 150:9,12,13 152:11,12 153:21 167:15 180:11,19 182:12 184:21 185:4,11 188:1 191:5,16,17 193:6 282:10 283:8 286:13,19 306:11 363:18 373:3,7 385:2,8 387:17 388:5 391:9 408:5 408:9 409:17 417:16,18 418:8,9 420:3,20 422:16 422:17,21 425:11 427:9,10,11,12,14 428:4,6,8,19 434:22 435:15 437:12 438:1 440:16 441:12,21	442:6,7,11,13,18 443:7 444:16 448:11,12 450:15 451:3 452:12,17 452:19 453:3,9 454:2,3 <b>people's</b> 444:18,20 452:8 <b>perambulated</b> 174:21 <b>perceive</b> 112:4 281:5 <b>perceived</b> 280:5 446:1 <b>perform</b> 91:4 95:14 95:19,21 96:3 340:5,12 426:4 <b>performance</b> 90:3 <b>performed</b> 209:12 209:22 <b>performing</b> 89:21 93:16 94:22 97:9 391:13 <b>perimeter</b> 145:4 206:8,9 368:20 417:1 <b>period</b> 268:5 343:19 358:3,9 379:16 407:11 413:3,4 457:14 <b>permissible</b> 177:16 <b>permit</b> 131:1 <b>permitted</b> 134:21 287:19 <b>permitting</b> 17:17 <b>person</b> 10:5,6,6,8 11:2,4,5,8 12:2 13:5,6 21:6 23:9 39:5,7 41:20 51:20 52:7,10,19 53:5,5,7 56:3 58:2 59:17 61:13,22 62:10 63:20 64:3 65:5 69:8,9,15,19 69:22 70:5 74:6,8 74:14,15 75:3,6 76:9,19,20 83:7	93:7 94:7 100:19 104:11,15 107:17 109:5,6,11,18 111:11,19 112:15 114:1 119:18,19 119:22 120:7,11 120:16,20 121:8 131:10 132:20 134:5 137:6 138:8 138:9,11,16 140:18 142:20,21 143:2 144:1 148:2 148:6 150:14 154:19 188:13 190:11 191:10 203:2,9 215:3 313:22 332:22 333:1 351:9 367:13 376:18 386:17 418:1,3 423:8 426:11 429:4 431:21 433:8 435:9 438:7 438:9 443:11,14 445:7 <b>person's</b> 41:2 53:6 66:21 112:9 450:20 <b>personal</b> 90:14 91:10,11 105:19 285:4 291:4 292:16 293:3 302:7,10 312:17 313:11 318:12 319:14 320:1 333:8 376:17 <b>personally</b> 161:12 175:19 404:11 <b>personnel</b> 9:12 10:20 59:7 81:3 83:2 98:21 109:7 111:5 145:16 152:22 161:2,19 162:7 175:14 179:12 190:1,3,8 191:14 192:12 395:8 442:20	443:3 <b>personnel's</b> 162:11 164:13 <b>persons</b> 24:6 28:16 29:18 30:8 35:7 36:8 37:5 39:22 91:19 92:2 93:2,6 95:4,14 98:21 99:1 100:17 102:3 122:6 124:16 126:5,14 128:17 131:14 147:5 161:18 165:17,21 181:3 187:19 192:5 201:17 203:22 419:6 423:7 425:4,7 426:21 430:17 436:19 440:15 442:1 <b>pertains</b> 91:9 <b>Peru</b> 434:10 437:12 437:14,21 440:13 441:5 <b>Peru's</b> 415:3 <b>petitioner</b> 281:16 <b>phone</b> 132:1,3 186:10 211:7,10 <b>phonetic</b> 173:10 <b>photograph</b> 84:18 86:5 <b>physical</b> 90:14 91:10,11 419:7 <b>physically</b> 33:15 45:6 92:8 139:6,8 151:1 160:17 169:12 <b>pick</b> 50:4 <b>picked</b> 187:22 <b>picking</b> 454:19 <b>place</b> 1:7 3:7 5:17 8:16,21 9:2,3,6,11 13:18,20 18:5 33:21 34:15 36:9 37:6,7,8 38:7 80:3 83:8 85:1 104:2 124:15 136:22
---	---	---	---	--

161:10 171:3	218:5 222:19	445:4 456:21	443:13 445:11	<b>premarked</b> 234:4
172:5,7 182:10	225:15,16 230:16	<b>pointed</b> 45:14,20	447:8	<b>premise</b> 424:18
183:4 186:4,8	232:11 234:20	196:19	<b>policeman</b> 48:16	426:10
189:10 191:6	235:13 236:2	<b>points</b> 76:3 278:8	<b>policemen</b> 48:13	<b>premises</b> 61:22
196:18 201:1	242:9 248:21	281:17 423:14	<b>policies</b> 53:12,13	280:13 419:10
206:6 278:22	255:12 261:3	<b>police</b> 1:8 12:21	53:14,16,17,18	<b>presence</b> 66:11
329:22 330:1	263:3 267:8	13:5,11 19:17	54:15,17 55:10	67:22 121:17
356:12 357:18	294:16 311:17	22:21 24:18 26:13	<b>policing</b> 431:22	173:16 179:4
359:22 365:14,15	344:13 349:13	30:17 39:5,6,18	432:8	280:21 304:5
366:4,7,15 374:1	<b>plenty</b> 344:14	45:9,10 48:9 49:4	<b>policy</b> 52:22 53:2	369:7
374:9,12 376:6,9	<b>plus</b> 390:6	49:10 57:4,6,13	<b>Polo</b> 319:6	<b>present</b> 3:21 84:16
377:1,3 386:4	<b>point</b> 10:15 11:3	57:20,21 67:6	<b>portion</b> 316:20	114:11 119:18,20
403:8 408:6 412:2	14:18 17:5 20:16	68:12 106:3 107:5	<b>posit</b> 279:10	160:17 169:12
416:2,7,19 417:1	24:7,16 26:12	108:2 112:11,14	<b>posited</b> 178:3	177:2 189:3 192:2
419:7,8 420:4	27:13,22 30:2,5	126:6 134:12,14	<b>position</b> 93:19	197:21 198:8
421:13 422:7	30:15 35:6,19	135:2,8,10 146:1	151:17 169:7	220:21 236:7
425:1 427:9,20	44:5,21 53:22	148:13 149:17	193:17,18 329:17	258:13 282:10
434:3 443:15	58:8 69:21 76:3	150:6,7 166:19	369:8 386:5	297:2 407:15
446:15 449:13	76:17 84:1 99:8	168:22 169:8	<b>positioned</b> 375:14	448:16
453:7,16	100:22 111:3	190:1,10,20	375:16	<b>presented</b> 282:21
<b>placed</b> 170:22	112:13 113:15,21	201:11,15 204:4	<b>positions</b> 327:11	308:18 407:13
281:18 415:12	117:13,14 118:13	204:10 240:20	<b>positive</b> 369:2,3,7	408:10
416:12,19	126:6 129:11	241:21 243:11	<b>positives</b> 397:19	<b>presenting</b> 14:11
<b>places</b> 384:3 415:2	130:4 131:4	246:14 254:9	<b>possible</b> 91:13	<b>presently</b> 89:17
<b>plainly</b> 432:13,16	137:22 138:1,19	259:9,20 260:5	97:11 211:9 223:7	<b>presents</b> 407:7
<b>plaintiff's</b> 293:18	140:2,8,17,21	261:16 264:8,13	223:8 325:12	<b>press</b> 439:7
<b>plan</b> 55:3 318:17	141:18 143:17	267:17 275:12,18	342:18,22 343:20	<b>pressure</b> 188:15
324:5,12 325:6,9	144:7,21 145:5	278:17 279:4,14	<b>possibly</b> 310:4	<b>presumption</b>
326:3,3,6 413:19	156:18 157:13	279:22 280:10,13	<b>post</b> 442:15,17	350:20
415:1 421:12	162:8 163:11	281:6 283:6	<b>posted</b> 234:20	<b>pretty</b> 13:15,20
422:5,15,20	167:11 169:17	285:17 286:18,18	369:8	15:16 18:17 19:12
424:22 436:18	177:5 180:16,20	296:5 297:16	<b>posts</b> 416:6	20:3 27:19,19
437:6,7 443:10	181:18 183:6,11	298:4 300:9 303:4	<b>potential</b> 102:12	28:12 31:2,2,12
447:11 456:18	184:2 185:5	304:5,7,10 307:4	<b>potentially</b> 219:15	32:7 36:14 37:3,9
<b>plans</b> 324:16 326:9	189:22 192:2	307:8 337:2 348:2	408:13	42:7 50:20 57:7
423:3	195:3 196:14	357:6,9,22 367:13	<b>practical</b> 187:18	63:14,16 70:1
<b>played</b> 370:1	206:5 207:12	368:4,6 369:11,13	<b>practice</b> 52:16 58:1	72:15 85:20 91:12
409:19	218:9 281:17	369:14,20 382:15	<b>pre-payment</b>	92:4 94:19 96:10
<b>playing</b> 118:13	282:18 283:14	382:16 383:16,22	209:21	100:20 110:20
119:2,3,4 131:12	284:12,13 287:4	385:1 386:5	<b>predicate</b> 7:3 440:5	115:9 121:12
136:16	293:1 294:19	398:12 407:22	<b>predisposed</b> 425:5	125:17 134:13
<b>please</b> 5:6 6:8	303:7 304:13	408:15 409:10	425:10,12 426:11	142:6 149:11,13
38:13 89:9,14	305:18 306:2,17	410:2 429:15,17	426:12	152:14 168:8
91:21 111:20	307:6 312:10	429:17,18,21	<b>prefer</b> 342:17	323:2 377:22
159:4 188:12	325:14 330:21	430:3,12,17 434:2	389:10 390:2	384:5 385:12,18
202:6 209:14	332:9 340:3 354:4	434:4,7,8 438:15	<b>preferred</b> 342:10	389:5 400:13
210:1,20 211:3	355:22 356:17	439:7 440:18	<b>prefers</b> 342:15	<b>prevent</b> 17:16

<b>preventing</b> 33:20	<b>privy</b> 441:6	178:12 291:18,19	407:16	<b>punctured</b> 386:20
<b>previous</b> 228:7	<b>probably</b> 26:5	302:9 332:22	<b>provide</b> 84:2	<b>purported</b> 282:22
245:11 252:15	36:17 39:19,19	333:5 356:4 442:4	102:22 111:11,22	<b>purportedly</b>
261:9 289:21	40:11,11 68:10	<b>procurement</b> 160:8	201:8 218:3	104:12 440:11
401:7 402:20	71:12,17 97:20	333:17 358:13	225:14 232:11	<b>purpose</b> 33:19
426:18	132:10,10 137:19	<b>produce</b> 356:1	311:14,16 320:16	189:20 344:5
<b>previously</b> 46:16	137:20 141:16	<b>produced</b> 200:1,9	333:19 334:4,11	459:10
84:6 126:1 184:14	184:6 286:8	293:16 332:21	356:7,18 369:19	<b>purposes</b> 312:12
205:6 208:4 214:5	458:15	353:2,4,8 355:19	426:20 429:22	334:11
216:6,14 219:9	<b>problem</b> 10:9	356:3	446:16	<b>pursuant</b> 325:10
220:4 223:18	17:22 57:17 58:6	<b>product</b> 380:18	<b>provided</b> 6:16	326:15 327:7
224:6 227:6,14	60:3 65:10 74:13	<b>production</b> 293:17	305:14 407:12	328:4 330:4 356:4
228:19 229:5	87:14 94:11 110:5	294:2	<b>provides</b> 358:11	459:1
231:6,15 233:13	111:13 114:6	<b>proffer</b> 300:22	<b>providing</b> 110:21	<b>push</b> 105:6
233:21 237:18	115:11 139:22	311:18,19	320:5 326:11	<b>pushed</b> 104:7,16
238:4 243:18	168:1 173:21	<b>proffered</b> 440:8	380:2 429:18	105:7 106:16,19
247:4 250:7	323:15 393:18	<b>profit</b> 433:14 447:7	433:22 446:20	107:1 123:20
251:19 252:10	428:9 432:12	<b>profoundly</b> 424:19	<b>provision</b> 432:9	137:7 144:4
253:10 254:3	434:17	447:21	<b>provisions</b> 414:22	162:21 384:1
257:22 258:2,5	<b>problematic</b> 412:6	<b>profusely</b> 187:2	<b>provoked</b> 281:5	386:10,14 387:14
263:9 264:2 265:2	<b>problems</b> 75:16	<b>program</b> 334:14	<b>proximity</b> 12:4	401:4
265:14 266:13	167:22 175:9	335:5,9,20,21	24:8 26:1,3 29:19	<b>pushing</b> 20:13
268:2 270:18	338:21 431:7	337:13 339:15	171:20 408:6	104:5,9,12 117:3
271:13 272:8	<b>procedural</b> 378:15	410:14,17,22	424:8	118:3 121:22
273:8 274:10	431:8	411:20 456:1,2	<b>PSA</b> 398:8	122:7,8,20 124:17
275:2 276:1,12	<b>procedure</b> 238:16	<b>projects</b> 430:18	<b>public</b> 203:15	137:13 139:3,5,6
288:7 300:3 301:6	352:7	<b>prolonged</b> 173:16	286:12,12 301:12	139:8 140:9
307:2	<b>procedures</b> 6:4	<b>promoted</b> 429:6	307:10 407:9	141:13 144:12,17
<b>primary</b> 278:8	160:5 177:8 178:1	<b>prompt</b> 206:1	416:13 429:18,22	361:3,11,17,22
<b>print</b> 381:16	179:19 313:1	259:5,14	430:1,8,14,18	418:16,18,19
<b>printed</b> 101:10	438:19	<b>promptly</b> 259:1	431:22 432:3,4,8	<b>put</b> 52:2 85:8 114:2
381:16	<b>proceed</b> 94:14	<b>prong</b> 401:5	433:13,17 434:1	142:6,8 156:17
<b>printout</b> 379:7	178:7,16 188:12	<b>proper</b> 215:19	439:2,5 442:22	164:19 168:7
381:4	238:17 260:22	260:1,2 282:19	443:1,15 447:8	173:1,2 196:1
<b>prior</b> 8:13 55:18	261:2	353:16 421:14	448:17 451:1	263:2 296:15
59:1 110:19	<b>proceeding</b> 287:21	<b>properly</b> 151:13	455:2,13	395:5 405:1,22
124:10,13 286:16	302:4 303:2	278:19 421:5	<b>publically-funded</b>	406:1 417:9
286:16 300:14,15	304:21 306:21	<b>property</b> 83:9	430:9	421:13 422:6,12
303:22 304:17	401:15,17 458:18	294:5	<b>publishes</b> 439:3,4	451:8 452:8
306:2 310:12	<b>proceedings</b> 158:1	<b>proprietor</b> 158:13	<b>pull</b> 380:15,16,20	453:14
337:7,7,10,12	258:13 298:14	159:8	381:10 435:14	<b>puts</b> 442:10
344:14 357:21	303:22 304:15	<b>protect</b> 34:7 35:13	<b>pulled</b> 134:9	<b>putting</b> 34:21
360:3 375:13	305:12 306:20	<b>protested</b> 262:3,13	203:11 380:10,11	98:17 387:13
382:19 402:22	314:5,6 332:20,20	281:9	381:9 435:17	399:3 449:16
403:4,11,12	406:13	<b>protests</b> 305:18	<b>pulling</b> 126:17,19	
420:19 451:22	<b>process</b> 91:17 95:2	<b>protocol</b> 57:12	<b>punch</b> 383:13	
<b>privately</b> 138:11	98:2 150:21,22	<b>proven</b> 245:14	<b>punching</b> 383:18	

## Q

Q,R 2:16

<b>qualification</b> 82:19	404:11 445:1	<b>R</b> 262:12 263:11,12	126:6 144:12	230:19 231:1,17
<b>qualifications</b> 92:1	458:11	263:15,17 348:13	162:18 280:6	232:10 233:1
<b>qualified</b> 66:15	<b>questioned</b> 201:10	<b>radios</b> 395:5	407:18 409:12	234:1 236:8,15
283:5	201:14 202:2	<b>radius</b> 368:16	425:6 446:4	238:6 244:3
<b>Queen's</b> 365:3	291:21 294:12	<b>railroad</b> 25:5	451:15	247:12 248:20
372:21 373:5	<b>questioning</b> 295:4	<b>raise</b> 388:6 441:17	<b>reasonable</b> 418:21	249:13 252:4
374:2,14 376:8,21	312:13 313:15	<b>raised</b> 245:12	426:5 442:3	253:18 255:19
377:1,4 403:9,12	321:18	302:3,12 304:1	<b>reasonableness</b>	260:21 262:13
<b>Queens</b> 31:15	<b>questions</b> 43:5	<b>raiser</b> 72:16 136:13	67:1	263:5,18 264:17
32:11,12,13 68:13	49:15 57:1 60:6,8	136:16 137:12	<b>reasons</b> 459:14	267:6 268:4 271:3
133:14 155:6	60:11,12,13,14	<b>ran</b> 21:2,3,6,9,10	<b>rebuttal</b> 2:7 60:11	271:4 272:2
182:14 183:5	63:6 68:3 71:1	21:11,20 39:8,9	60:13 76:1 406:4	273:17 274:20
184:1 190:17,19	73:17 75:22 76:1	186:22 398:3	423:17 424:15	276:10 278:14,18
194:3,5,7,11	76:1 81:6,7 83:13	<b>re-allowed</b> 52:11	448:5,9	301:15 322:14,18
195:5,15 280:15	83:22 87:15	<b>re-enter</b> 53:10	<b>recall</b> 4:6 9:16	394:1,8 413:5
419:16	111:17,18,21	<b>re-forwarded</b>	13:19 16:8 116:21	<b>receiving</b> 7:4 234:3
<b>question</b> 29:2,11,15	112:5 125:21	252:21	181:18,20,20,21	259:4 266:3,9
29:22 49:2,8,9	135:19 136:6	<b>reached</b> 211:6	207:12 210:9	273:13 322:20
53:20 54:5 62:22	146:17,19 150:17	217:20	211:17 212:16	323:5 324:6
67:2,18 68:5	152:17 154:15	<b>reaching</b> 215:18	213:14 284:11	412:21
73:19 76:7 77:4	155:10,10,13	<b>read</b> 94:12 219:18	320:14 326:2	<b>recipient</b> 217:14
81:8,22 82:9,18	187:4 210:1 213:4	255:12	328:13 329:13	218:19
82:21 85:22	241:1 292:5	<b>reading</b> 348:11,14	402:19 403:1	<b>recite</b> 53:22 215:10
102:14,15 117:10	294:19 295:1	<b>reads</b> 221:15	404:3	217:17 236:2
120:19 121:5	307:15,17 308:17	334:13	<b>recalled</b> 382:11	245:5
124:5 125:5 126:2	308:18 315:5	<b>ready</b> 239:4,5,6,10	<b>recap</b> 284:11	<b>reciting</b> 177:20
127:17 128:2,6,7	328:17 354:3	289:6 308:10	<b>RECD</b> 2:8	<b>recognize</b> 208:8
154:18 178:9	355:3,5 359:19	406:6,17,18	<b>receipt</b> 258:6	214:12 216:21
195:4,7 219:17	367:3,5 377:7	<b>reality</b> 455:18	378:19 393:21	220:11 224:13
236:4 262:20	385:19 391:21	<b>realize</b> 58:3	<b>receipts</b> 337:2	227:21 229:12
269:11 284:5,14	395:12,17,17	<b>really</b> 14:5 22:15	<b>receive</b> 7:14 91:8	231:22 234:11
285:1 292:13	400:13,14,19	55:6 60:1 62:12	167:3 206:22	239:21 244:7
293:2 294:19	401:1 404:1,1,2,6	70:6 73:1 117:18	212:7 218:2	247:18 252:12
295:20 302:14	405:11 435:2	117:20 147:12	221:14 222:2	254:5 261:10
309:7,9 322:10,11	<b>quickly</b> 128:22	150:9 167:9	225:12 241:12	264:3 265:4,16
326:5,5,5,7 327:6	129:6,7 150:3	181:16 195:2	256:18 394:6	267:13 270:19
331:3,4,18,21,22	448:5	278:3 284:10	431:14	272:10 273:2,10
332:10 335:14,18	<b>quite</b> 130:5 147:5	329:20 386:4	<b>received</b> 95:5,16	275:3,14 288:8
337:10 338:2,6	167:14 212:10,11	390:2,8 408:7	145:10 177:13,15	289:8 300:4
340:9,17 341:2,16	295:2 385:20	444:8,9 449:9	177:21 210:4	323:21,22 324:2
341:20 348:20	390:15 447:15	<b>reargue</b> 303:13	212:17 214:7	334:16 373:12
349:17 350:6,15	<b>quorum</b> 238:17	<b>reason</b> 13:10 19:16	216:16 217:21	392:8
350:17,21 351:14	<b>quota</b> 385:12	22:20 26:13 30:16	219:2,3 220:6	<b>recognized</b> 439:16
354:16 360:10	<b>quote</b> 457:8	34:3,22 57:4,6	222:17 223:4	440:5
376:16 380:8	<b>quoted</b> 450:14	58:16 69:20 75:14	224:8 225:10	<b>recollect</b> 315:17
391:20,22 392:21		108:1,4,9,9 116:2	226:18 227:2,16	316:6,8,9,11
400:6,7 401:19		116:4 122:18,19	228:16 229:7	317:22 318:6,16
	<b>R</b>			

318:18 319:4,7,8 319:16,18 320:2,5 320:12 322:1 324:6 327:17 328:9,19 330:3,5 330:9,11 <b>recollection</b> 98:8 182:1 311:15 318:14 321:4 330:22 332:2,19 333:6 414:15 <b>reconcile</b> 210:21 211:14 232:13 392:18 <b>reconciliation</b> 432:15 <b>reconciling</b> 214:21 215:15 223:1 <b>record</b> 3:9 5:6 17:13 74:21 88:16 89:15 158:2,3,5 159:5 198:8,15 202:21 239:2 282:18,22 284:20 286:12,13 292:7 298:20 301:12 304:14 308:7,10 316:18 349:14 354:9,11 406:14 406:15,17 413:9 415:7 416:15 439:2,6,8 449:2,4 452:11 453:17,18 458:21 <b>recorded</b> 199:8 <b>recorder</b> 203:17 293:22 <b>recording</b> 199:11 199:13,15 216:1 260:5 <b>records</b> 203:19 259:12 431:3 454:11 <b>recross</b> 2:2 84:1 396:1 <b>RECROSS-EXA...</b> 84:13	<b>recurring</b> 315:3 <b>red</b> 87:1,9 <b>redirect</b> 2:2 76:3,4 83:22 400:21 416:10 <b>Redline</b> 5:16 50:3 <b>redo</b> 346:11 <b>reduced</b> 347:14,16 347:17 438:20 <b>reenter</b> 64:4,5,7 126:18 <b>reentry</b> 174:4 <b>Reeves</b> 1:13 <b>refer</b> 5:17 165:3 211:8 306:19 353:11,13 355:8 357:16 403:20 422:14,19 <b>reference</b> 206:21 218:7 219:20 235:2 248:17 251:3 306:20 307:1 311:1,13 323:14 329:8 349:16 370:12 416:16 450:21,21 <b>referenced</b> 250:20 346:14 415:3 <b>references</b> 323:19 414:22 424:5 <b>referred</b> 173:9 201:20 208:18 304:18 401:2 422:15 <b>referring</b> 6:14 128:9 165:4 172:13 191:20 211:21,22 366:12 366:14 371:21 377:13 <b>refers</b> 203:18 <b>reflect</b> 219:5 223:14 227:1 228:15 231:1 243:14 246:21 263:4 274:6 <b>reflected</b> 257:17	<b>reflecting</b> 221:18 <b>reflects</b> 233:8 237:12 251:14 <b>refresh</b> 311:15 321:4 <b>refused</b> 280:6 285:5,9,20 <b>refusing</b> 285:18,19 <b>refute</b> 294:7 <b>refuted</b> 423:9 436:9 <b>refutes</b> 407:13 436:1 <b>regard</b> 189:12 204:1 306:18 408:8 <b>regarding</b> 136:7 137:12 214:20,21 219:18 279:7,8 281:3,22 282:14 292:5 294:7,14,19 295:1 303:4 310:15 311:7,10 312:14 314:4 317:17 319:5,11 320:6 328:17,22 330:10 331:15 333:16 337:7,13 337:19 338:7,8,17 338:21,21 339:1 339:14 340:22 350:10,17,18 351:19 352:13 359:2 360:5,16 400:7 401:2 402:12 403:3,15 403:19 404:7,16 405:2 408:8 409:3 409:13 410:11,14 412:8 413:21 416:18 417:2 424:6,7 453:15 456:6 <b>regardless</b> 393:5 413:10 455:6 <b>regards</b> 6:5 30:17 92:1 93:15 99:14	159:22 175:13 198:22 202:7 203:8 277:7 295:6 296:6 307:3 445:11,17 <b>regime</b> 439:13 <b>Register</b> 439:3 <b>registered</b> 60:21 <b>regarding</b> 409:1 <b>regular</b> 63:10,11 63:14 78:7 212:10 387:21 388:2,4 398:8 <b>regularly</b> 212:11 <b>regulate</b> 426:22 427:3,3 444:20 <b>Regulation</b> 1:3,16 <b>regulatorily</b> 434:16 <b>regulatory</b> 7:2 60:22 434:16 439:13 442:4 445:20 <b>reimbursable</b> 66:4 66:11 68:1,7 147:5 204:11,16 204:20 205:1,7,10 205:21 206:1,12 206:16 209:11 211:1 272:14 273:6 275:12 276:13 277:9 279:5 280:7,12 284:16 285:4,7,18 291:13 294:9 299:9 304:3 319:13 327:15 328:6,22 333:17 334:14 335:20,21 336:12 337:1,13 338:22 339:1,4,14 367:9,21 369:1 370:4,18 371:5,9 374:4 392:14 393:7 397:16 409:10 410:5 412:16 413:12 416:5 430:5 433:9	438:17 446:3,11 446:12 455:2 <b>reimbursement</b> 411:10 <b>reiterate</b> 17:11 <b>related</b> 178:13 290:4 295:22 330:7 401:4 403:7 <b>relates</b> 348:6 <b>relation</b> 7:10 8:15 85:6 159:18 374:16 <b>relations</b> 8:16 <b>relationship</b> 135:14 246:4 305:12,21 319:6 433:10 456:13 <b>relative</b> 101:18 <b>relatively</b> 103:8 <b>relaxed</b> 168:8 177:9 <b>relay</b> 283:20 <b>relevance</b> 101:20 277:12,14 278:6 284:21 285:16 289:16 292:6 298:9 300:11,22 301:10 331:4 340:15,16 341:14 344:11 345:22 398:21 <b>relevancy</b> 292:3 <b>relevant</b> 341:6 400:4,11 <b>relocated</b> 339:5 <b>remain</b> 13:13 88:1 143:6 155:19 156:1,8 170:3 248:18 458:17 <b>remainder</b> 222:22 <b>remained</b> 46:11 143:6 145:4 171:2 171:8,10 <b>remaining</b> 349:6 <b>remember</b> 10:15 219:6 310:3 311:11 316:11
---	--	--	---	--

318:9,15 319:13	<b>request</b> 174:10	222:6 226:4,5	300:4 301:7,8	290:4,6 295:6
322:12,20 323:5,8	200:2 211:22	228:6 230:10	406:4	302:2,2 303:6
324:1 325:12,13	236:8,16 343:12	242:17 249:16	<b>responding</b> 220:21	<b>retaliatory</b> 281:6
325:20 326:11	385:13	443:14,19	221:6	<b>retrieve</b> 186:15
327:8 329:20	<b>requested</b> 210:22	<b>responded</b> 117:3	<b>responds</b> 218:10	198:9
333:15 344:22	211:15 236:5	139:13 235:12	<b>response</b> 66:19	<b>retrieved</b> 200:21
357:10 367:9	248:18 277:1	<b>respondent</b> 3:19	77:4 111:6 197:15	<b>retrospect</b> 282:4
372:16,17 417:7	278:14 281:8	4:10 5:1 88:22	212:17 225:2	<b>return</b> 97:15,18,19
449:22 450:1	356:12	158:11 239:20	226:9 230:5 232:3	157:1
<b>remove</b> 164:13	<b>requests</b> 343:4	244:3 247:12	235:6 250:2	<b>returned</b> 112:19
<b>removed</b> 161:11	<b>require</b> 370:14	252:4 253:18	251:10 371:15	113:14 114:16
165:16 172:16	<b>required</b> 9:16	259:2,6,13 260:2	377:7 391:20	167:19 174:20
176:8 180:5	161:1 240:21	260:20 263:17	404:2 420:22	<b>revenue</b> 432:3
181:18 378:20	356:7,9,19 387:4	267:5 272:1	421:10 429:1	<b>reviewed</b> 221:13
<b>rendering</b> 189:4	446:21	274:19 276:10	436:12,13	<b>reviewing</b> 242:21
<b>repayment</b> 209:21	<b>requirement</b>	278:11 279:6,19	<b>responsibilities</b>	386:12
<b>repeat</b> 51:7 328:2	349:21 350:9	279:20 281:4	145:15 449:16	<b>revise</b> 223:10 242:5
337:9 340:9	351:12,18 410:4	290:19,22 301:15	455:22 456:3	<b>revised</b> 222:4,18
349:13 359:4	413:11 414:11	305:1 344:13	457:16	223:4,6 230:19
<b>repeated</b> 125:16	430:20	424:17 452:16	<b>responsibility</b>	242:9 251:2
<b>repeatedly</b> 333:4	<b>requirements</b>	<b>respondent's</b> 208:5	17:15 47:18,19	255:17,21 257:3,6
<b>repeating</b> 399:1	410:15 412:2	213:18,20 214:1,4	50:17,21	258:4 262:12
<b>rephrase</b> 49:8	414:16 422:22	216:6,7,9,13	<b>responsible</b> 160:1	264:17 265:5
67:10,13 111:20	423:21 454:15	219:10,11 220:2,3	206:9 293:16	266:3,10 268:4
112:5 121:4	455:18	223:19,20 224:4,5	294:2 304:9 433:8	269:10 271:3,4
127:16 335:18	<b>requires</b> 324:3	227:7,8,12,13	<b>responsive</b> 438:5	273:5,13,17
350:5 355:1	426:9 438:19	228:20,21 229:4	<b>rest</b> 72:21 101:7	275:20,21 348:3
<b>rephrasing</b> 351:16	<b>requiring</b> 209:21	231:7,8,13,14	153:13 188:16	<b>revising</b> 318:17
<b>reply</b> 204:13 241:3	<b>rescue</b> 163:1 442:1	233:14,15,19,20	362:8 427:12	<b>revision</b> 243:3
<b>replying</b> 234:18	<b>resend</b> 251:2 253:3	237:19,20 238:2,3	<b>restate</b> 29:14	262:17 265:8
<b>report</b> 186:11	<b>resent</b> 252:22	243:19,20,22	309:12,13 362:21	268:8,19 269:5,9
215:18 236:4	<b>reserve</b> 423:17	247:5,6,10 251:20	401:19 402:6,8,9	270:8
360:12,16 411:15	424:14	251:21 252:2,11	402:9	<b>revisit</b> 301:21
415:4 416:14	<b>reserved</b> 437:15,21	253:11,12,16	<b>restatement</b> 309:7	<b>rhythm</b> 139:16
435:9,11,20 436:7	<b>resident</b> 5:8	254:4,21 255:10	<b>restating</b> 124:9	<b>ride</b> 10:12 115:21
442:12	<b>residential</b> 368:17	257:2,17,21 258:1	179:7 297:6	116:7,9 154:20
<b>reported</b> 191:17	<b>resolution</b> 7:10	258:3,6,8,21	<b>Restrain</b> 179:16	<b>riding</b> 70:16
192:8,14 215:16	<b>resolved</b> 259:16	261:10 262:11	<b>result</b> 326:12	<b>right</b> 19:21 27:2,15
<b>Reporter</b> 84:20	290:1	263:10,10,12,15	394:20 395:1	29:6 31:17 35:17
383:9	<b>resources</b> 416:8,10	264:3 265:3,15	458:16	36:21 37:13 41:3
<b>reports</b> 7:12	421:1	266:14,16 267:2	<b>resume</b> 240:21	42:16 43:18 46:6
416:17	<b>respect</b> 378:1	267:12 268:3	<b>resumed</b> 88:17	46:9,9 49:18
<b>reposition</b> 383:3	<b>respectively</b> 258:9	270:19 271:14,16	239:3 308:8 315:8	50:10,18 51:4
<b>representation</b>	263:5,12 266:17	271:20 272:9	333:12	52:2,9,14 53:9
213:14	271:17 274:13	273:1,9 274:5,11	<b>resuming</b> 246:4	55:8,12,14,15,16
<b>representing</b> 3:12	<b>respond</b> 50:14 76:6	274:12,16 275:2	<b>Retailer</b> 1:8	56:4 57:11 58:8
<b>represents</b> 253:7	174:3 210:10	276:2,3,7 288:8	<b>retaliation</b> 279:12	59:6,13 60:2

61:12 67:7 70:7,8 74:3 79:15 82:21 84:21 85:9,12 86:2,8,9,18 87:4,8 111:4,10 113:19 118:12 128:4 130:14 132:9 136:3,15 137:10 137:16 139:1,5 140:2 142:11 143:17 144:7,20 145:8 146:16 150:16 152:11 155:10 157:15,18 170:6 197:1 210:14 223:11 235:13 238:11,18 239:7 251:12 256:12 263:1 267:1 281:13 287:11,16 288:13 288:15 293:13 301:4 303:17 307:19 308:15 310:10,16 315:10 317:8,11,13,16 322:12 323:16 325:11 328:16 329:10,22 330:20 333:14 334:11 335:1 336:20 340:2 342:1 343:19 344:19,22 345:4,7,12,15,18 346:5,20 347:1,11 347:20 349:20 351:2 353:20,22 355:12,22 357:5,8 357:15,19 358:8 358:10,21 359:18 359:22 361:6,9,17 361:22 362:10 363:8 364:2,5,12 365:12 366:3,15 366:21 375:9 378:10 380:1 382:2,20,22 392:4	394:16,21 395:20 399:16,19 400:5 402:21 404:12,22 406:11 419:8,8,9 420:3 426:1,2,15 436:7 443:15 446:7 447:4 451:5 <b>rights</b> 425:14 <b>road</b> 31:15 68:13 155:7 182:15 183:5 184:1 190:18 194:4,5,7 194:11 195:5,15 280:15 365:3 372:21 373:5 374:2,14 376:8,21 377:4 403:9 427:19 <b>RODRIGUEZ</b> 1:21 <b>Rogers</b> 148:21 207:2 208:14 209:5 210:2,4,10 210:17,18 212:18 213:15 215:15 218:15 220:17 221:9 222:12,17 223:15 226:12,13 228:5,10,16 230:5 230:9,17 231:2 232:4,16 233:2,9 235:4 236:5 240:5 240:12 241:2,6,7 242:17 243:15 244:12,15,19,20 246:22 248:1,12 248:14,16 249:16 250:3,14 251:15 252:16 253:1,4,7 262:4 334:22 337:4 338:17 342:11 352:2,7 370:22 380:12,13 392:17 410:16 429:13 430:4,21 431:19 432:11,20 454:7,9	<b>role</b> 339:21 <b>roll</b> 459:20 <b>roll-out</b> 87:7 <b>roll-up</b> 78:2 <b>room</b> 1:13 88:11 155:19 156:2 283:16 329:11,12 329:14,15 394:3 <b>roughly</b> 6:2 24:9 130:10 <b>ruckus</b> 20:2,3 <b>Ruiz</b> 445:4 <b>rule</b> 293:1 389:6 412:7 <b>rules</b> 177:12 282:20 350:18,20 410:13,15,17,22 <b>run</b> 22:2 23:8 34:17 65:2 442:17 446:13 <b>running</b> 22:13,13 32:9,18 35:2 36:1 36:2 38:3 127:13 127:19 128:18 321:20 344:8 390:5 441:21 442:6 452:13 453:5 <b>runs</b> 441:22 442:5 <b>rush</b> 453:16 <b>RUTHANNE</b> 1:19	433:13,17 443:1 447:8 448:17 453:22 458:1 <b>sanction</b> 209:20 <b>Sankar</b> 3:14 <b>sat</b> 202:10 <b>satisfied</b> 199:22 203:22 458:12 <b>Saturday</b> 103:11 103:11 327:15 328:7 342:19 <b>Saturdays</b> 390:10 390:11,12 <b>saw</b> 19:16 26:16 48:9,12 58:9 62:8 62:9,10,11,13,14 63:1 149:5 161:14 187:1 228:7 245:11 334:21 335:2 355:12 417:11,14 419:12 422:1 423:10 427:8 428:16 435:14 436:11 <b>saying</b> 9:7 21:7 25:10 33:17 55:4 56:7 75:17 85:4 107:2 113:16 134:8 137:16 140:20 142:10 146:4 155:21 212:5 221:12 234:21 236:1 248:13 310:9,17 319:4 325:2 328:19 335:2,7 336:14,15 337:5 337:11 338:15 348:7 349:20 350:8 352:9 354:10 357:20 361:10 362:2,11 362:16 382:4 389:22 423:11 430:4,22,22 431:1 446:21 <b>says</b> 55:2 120:20	209:8,9 211:14 217:18,19 219:1 219:19 222:5 235:13 240:14 246:2 248:8,15 286:18 361:22 378:10 380:12 422:1 428:3,12 429:2 431:16 432:20 433:7,18 435:20 440:2,20 450:17 452:12,19 456:1 <b>scan</b> 316:13,15 317:9 <b>scanning</b> 316:17 317:10 <b>scattered</b> 397:21 399:7 <b>scattering</b> 373:8 <b>scene</b> 1:6 3:4,6,20 5:15,18 6:1 8:3,6 32:14 37:4 40:15 45:17,19 50:3,12 61:9 79:13 80:14 86:14,16 87:3 89:19,21 90:8 95:15 158:7 159:14 190:4,6 209:9,12 211:2 215:17 217:20 225:9 240:18,20 243:1 245:1 249:2 276:16 289:14 296:14,16 311:1 318:20 330:18 356:11 369:22 408:17,18 427:10 428:6,7,9 429:4 430:6 433:10,19 453:19 459:12 <b>Scene's</b> 321:8 <b>schedule</b> 156:13 <b>scheduled</b> 209:19 <b>School</b> 411:15 <b>scissors</b> 43:4 187:6 <b>scope</b> 66:16,22 81:6
<b>S</b>				
s 8:8				
<b>Sabrina</b> 214:18 232:9 235:18 237:13 244:13 246:22 <b>safe</b> 59:11 135:1,4 368:20 426:20,20 <b>safeguards</b> 409:5 <b>safety</b> 7:9 307:10 400:9 407:8,15 409:6 413:22 417:4 426:5 429:22 430:8 431:22 432:3,8				

258:13 326:20	49:21 53:22 54:15	28:16,20 30:5,8	<b>sent</b> 133:9,14,19	352:2,3,6,9,11,13
<b>screaming</b> 127:4	54:17,21 55:3	30:11,15 31:18,22	206:20 214:17	370:22 392:17
<b>screen</b> 92:12,16	57:18 58:16 60:1	32:2 44:2,14,20	217:22 225:11	410:16 429:5,5,13
96:18	60:21 61:8 69:7	50:22 51:3,8 59:8	228:13 232:9	430:4,21 431:19
<b>screened</b> 113:12	69:19 71:22 72:2	63:11 69:10 92:5	235:18 241:10	432:20 433:6,18
438:8	80:7,14,16,17	97:21 108:1 114:5	242:1,7 250:6,19	454:7,9
<b>screening</b> 7:5 76:16	81:2,2 83:2,2	114:6,12 117:11	434:4 443:2	<b>series</b> 57:1
76:18 91:19 92:2	89:19,21 90:4,6,7	126:5 130:19	<b>sentence</b> 94:13	<b>serious</b> 407:5
93:4,6,16,22	90:14 91:10,11	139:10 175:2	211:13 354:18	<b>service</b> 306:9
94:17 96:9 97:14	93:20 94:16 97:13	185:8 197:6 217:6	<b>sentences</b> 353:16	415:21 423:4
98:2 113:17,18	98:13,21 99:11	229:18 240:4	<b>separate</b> 98:17	454:21 458:5,5
114:7,16 150:20	109:7 111:5 114:7	248:3 249:17	165:17 179:20	<b>services</b> 133:1
150:22	114:16,20 121:22	250:1 252:22	303:2 304:21	241:13,18 242:1
<b>screens</b> 76:9	130:21 133:10	284:21 290:9,12	421:16 424:7	243:11 260:3
<b>sea</b> 446:11	134:18 138:12	305:20 315:19	445:1	278:13 279:11
<b>search</b> 151:2 154:3	141:4 145:16	316:14 324:2	<b>separated</b> 162:3	280:4 281:10
443:3	146:8 147:1,3,8	329:17 342:22	180:16 443:8	305:14,16 371:7
<b>searching</b> 92:6,7,7	151:18 152:21	348:4 365:2	444:15	411:15 412:21
92:8 95:1,2 98:12	153:14,21 160:4	369:10,11,19	<b>Separating</b> 444:16	429:19,22 430:8
112:19,21,22	161:1,19 162:3,7	373:7 378:4 379:7	<b>separation</b> 419:5	430:15,17,19
114:17 138:13	162:11 164:12	391:11 392:9,22	421:15	432:3 433:13,17
146:1 151:3	171:6 175:14,18	405:4 417:10,17	<b>September</b> 280:10	434:8,8
153:12,16	175:21 177:22	417:22 418:2,7	300:15 306:22	<b>session</b> 458:22
<b>seat</b> 89:10	179:12,19 180:8	419:2,3,5,14,21	320:4,10,11 321:2	459:4 460:9
<b>second</b> 16:18 22:19	181:8 186:18	420:3 427:18	321:13 402:22	<b>set</b> 35:22 37:17
138:8,11,19,20	189:5 190:1,3,8,9	437:13 438:1	403:3,5	102:3 368:19
177:6 199:20	193:4 201:17	439:7 444:3,11	<b>sergeant</b> 148:19,21	<b>seven</b> 141:7,8
207:22 288:20	202:12 296:10	446:15 452:11	149:1 196:12,15	<b>severity</b> 453:21
289:22 292:11	318:17 324:5,6,12	453:9,10	196:17,20 201:20	<b>shape</b> 328:20
314:11 321:7	324:16 325:6,9	<b>seeing</b> 20:8,10,11	210:10,16,18	<b>sheet</b> 249:5
334:13 404:19	326:3,3,6,9,11	22:12 330:9	212:17 213:15	<b>sheets</b> 240:16 241:9
444:14 459:17,18	327:9 339:22	372:17	215:14 218:15	242:22
<b>seconded</b> 459:20	361:1,7,12,13	<b>seeking</b> 459:10	220:17 221:9	<b>shield</b> 442:18
459:22	368:11 375:4	<b>seen</b> 20:14 22:13	222:16 223:15	<b>shirt</b> 9:22 10:21
<b>secondly</b> 124:5	383:14,18 387:12	38:14 43:15 55:4	226:12,13 228:5	11:6,14 16:7 40:9
282:16,17	388:20 395:7	63:18 64:1 73:1	228:10 230:9	74:15,16 126:17
<b>Section</b> 312:22	409:20 411:15	131:20 224:22	231:2 232:4 233:1	126:20 173:7,8
459:2,7,12,15	413:19 414:22	278:15,20 316:1	233:9 235:4 236:5	181:18
<b>secure</b> 20:2	417:7,14,19	322:4,7 337:3	240:4,11 241:5,7	<b>shirts</b> 72:21 101:8
<b>security</b> 5:13,14,15	421:12 422:5,14	347:4 387:21	242:17 243:15	101:9,10,14
6:1,4,6,9,15 7:1	422:15,20 424:22	398:15 458:15	244:12,15,19,20	<b>shooter</b> 31:22 35:8
7:14,15 9:17 10:2	436:18 437:6,7	<b>sees</b> 59:7	248:1,12,14	35:14 373:10,13
11:8 20:8,9,12,14	438:8 442:20	<b>send</b> 133:13 222:3	249:15 250:2,13	<b>shooting</b> 31:8,10,19
20:16 21:4,20,21	443:10 447:11	371:13 432:21	251:15 252:16,22	35:11 37:7 41:21
22:1,16 23:5	450:10 456:18	<b>senior</b> 411:7	253:4,7 262:4	41:22 42:4,5,11
24:22 30:3,22	<b>see</b> 14:13 21:20	<b>sense</b> 65:1 420:8,13	334:22 337:4	42:12,15,19 44:6
33:5 38:18,19	24:13 26:12 28:9	420:15 453:2	338:17 342:21	44:7,11 55:19

62:3 63:15 68:12 71:9 72:11 73:10 73:13 133:20 135:14 144:22 154:8 186:13 189:2 280:14 372:10 376:19 419:22 420:9,12 423:11 435:13,18 435:22 436:6 438:10 441:20 442:13,16 <b>shootings</b> 67:21 <b>short</b> 1:21 45:13 48:12 60:14,15,18 61:2,5,7,12,19 62:7 63:2,4,10,13 63:19 64:1,3,10 65:4,8,13,18,22 66:3,6,9 67:10,13 67:18 68:3 71:2,4 71:5,9,14,18 72:12 73:2,5,10 73:15,17 79:17 81:14 102:20,20 102:22 146:19,20 147:4,7,18,22 148:3,7,9,12,16 148:18,21 149:1,3 149:11,14,17,20 150:8,12,16 152:18,20,21 153:2,7,9,18,21 154:6,11,15 157:20 254:19 290:15 352:5 382:3,4,7,9,15 383:4 384:4,9,22 385:18 386:16,19 387:3,6,9,16 388:1,8,11,21 389:3,12,18,20 390:14,17,20 391:3,17 394:17 394:19,20 395:9 434:5 435:1 459:18,19 460:3,4	<b>Short's</b> 68:5 77:4 401:1 <b>shortcoming</b> 424:21 <b>shot</b> 38:14 39:5 41:15 43:1,5,14 44:3 73:21 74:2 74:14 85:16 131:22 132:4 133:9,11,16 134:6 134:9 186:19 188:22 192:10 408:5 454:3 <b>shots</b> 129:20,21,22 130:4,15,16 185:16,17,19 <b>shoulder</b> 425:16 <b>shoved</b> 445:8 <b>shoving</b> 361:3,12 361:18 362:1 418:16,18,19 <b>show</b> 85:14 86:18 199:20 201:9 250:9 251:6,10 252:10 254:18 279:2 281:7 283:8 283:8 315:10,11 320:16 337:2 352:14 407:14 431:3 437:5 446:9 458:18 <b>showed</b> 178:20 211:1,16 277:2 278:9 284:20 294:8 352:17 <b>showing</b> 254:2 256:22 261:8 262:10 264:1 265:1,14 267:11 268:1 270:17 272:7,22 273:7 275:1 277:16 278:21 282:7,8 288:6 300:2 345:1 440:14 447:11 <b>shown</b> 278:10 283:10,11 347:20	407:17 413:8 415:13 416:3 437:10 451:15 <b>shows</b> 84:18 379:11 407:6 412:19 413:2 415:16,21 420:17 421:2 432:13,16 437:10 437:12 438:11 442:13 445:18 446:4,6 451:18 <b>shred</b> 450:18 <b>shut</b> 343:13 345:19 428:11 445:22 <b>shutting</b> 434:14 <b>sick</b> 390:9 <b>side</b> 34:21 35:21 36:11,20 37:1,3,3 38:1,1,6,7,9,10 39:15 79:16 298:16 365:10,12 368:17 369:7 440:21 <b>sides</b> 138:1,4 <b>sidewalk</b> 13:19 14:5,7 36:2 37:17 38:9,10 39:15 83:8 <b>sign</b> 213:6 333:15 370:14 397:9 <b>signature</b> 232:12 336:19 370:14 <b>signed</b> 334:18 336:15,16 370:4 397:6,12 411:6 440:11 <b>significant</b> 256:15 296:19 <b>significantly</b> 255:7 256:5 <b>signing</b> 390:7 <b>SILVERSTEIN</b> 1:22 <b>similarly</b> 245:18 <b>simple</b> 453:17 <b>simply</b> 8:11 26:9 124:12 137:13	178:4 194:21 304:7 <b>Simultaneous</b> 351:6 <b>single</b> 363:2 417:12 439:3 450:18,19 <b>sir</b> 5:5,21 6:7 7:3,6 7:8,16,19 8:1,2,5 9:4,13,19 11:1,10 11:16,22 12:3,5 15:5 17:19 18:7 19:9 26:11 28:6 31:16,16,17 33:1 33:18 34:9 35:15 37:19 40:3,14,19 40:21 41:12,18 44:13 45:21 46:12 46:21 47:16 48:1 50:1,9 51:22 52:8 52:13,20 54:19 59:9 60:6,17 61:1 61:4,18 63:9,12 63:12 65:7,12,17 65:17,17 66:5 71:8 73:4 77:2,14 78:4,9 79:10,21 80:1,12 83:10 85:2,13 90:12,21 98:4 101:15 104:22 105:2,21 106:2,4,7,10 107:6,8,10,16,19 107:22 108:4,11 110:14 116:19 137:15 139:4 140:5 159:4,7,11 160:3,6,9,19 161:3,14,21 162:9 162:17 163:6 164:8 166:11,14 166:17,20 167:2 168:11,13,15,17 168:20 169:2,5,9 169:20 170:15,19 171:15 172:1 174:11,18 175:10 175:22 176:14	178:15 180:1,17 181:14 183:8,15 183:18 184:15 186:7 187:12,16 188:2,6,8,11 189:17,19,21 191:8,21 196:5,9 199:6,17 200:20 201:3,6 203:3,20 204:2,8,18,21 205:5,8,16,18 206:18 208:8,10 208:17 210:6 211:8,19 212:8 213:11,16 214:12 214:14 215:22 216:4,22 220:11 220:13 221:2,3,7 223:5 224:14,15 225:17,21 227:22 228:1,14 229:13 230:21 232:1,2,17 232:21 233:3,11 234:12,13 236:18 236:20 237:2,8,16 239:20 240:6 241:16,19 242:3 242:16 243:12 244:8 245:16,21 246:12,15,19 249:11,14 250:12 250:17 251:8,12 251:17 252:13 253:8 255:3 256:3 257:4,19 261:12 262:5,15,21 264:5 264:15 265:5,12 265:17,21 266:7 266:11 267:14,20 268:6,13,22 269:7 270:7,10,14,21 271:11 272:11,20 273:3,11,15 274:8 275:4,16,21 276:17,19 277:5 277:11 289:8,10 291:6,22 293:19
---	---	--	---	---

294:15 297:4,18	310:10 329:9	445:8	165:14 167:5	<b>staff</b> 80:17 99:12
298:5 299:3,5	357:11,14 369:13	<b>somebody's</b> 435:21	168:19 169:4	147:15,16 154:3
300:6 309:3,18	397:20 398:3	<b>somewhat</b> 24:4	171:22 172:2	226:4 230:15
311:4,12 312:9	446:18 448:3	90:15	196:12 197:1,10	342:19 446:16
317:10 319:15,21	451:14	<b>son</b> 334:18 336:15	352:9	<b>staffing</b> 219:1
320:14 321:6,10	<b>six-man</b> 369:12	336:16 339:9,11	<b>speaking</b> 15:12	350:2,10
322:3 323:13	<b>Sixteen</b> 199:5	339:13 370:3	65:20 103:21,22	<b>stage</b> 97:8,9
324:10 335:16	345:7	396:13 440:11	106:20 128:12,16	<b>staged</b> 85:4,5
337:15 338:13,19	<b>skills</b> 95:15	<b>son's</b> 336:19	128:19 143:13	<b>staggered</b> 385:17
339:3,16,18	<b>skinned</b> 39:14	<b>soon</b> 211:9	165:5 172:14	<b>stairs</b> 279:16
340:13 345:3,11	<b>slight</b> 100:2	<b>sorry</b> 17:8 50:14	174:13 182:21	<b>stairwell</b> 86:20
346:22 347:13	<b>slightly</b> 16:6	54:13 62:18 74:11	360:12 377:17	<b>stairwells</b> 86:21
348:12 349:4	<b>slower</b> 202:21	76:3 77:16,21	417:19 440:16	<b>stand</b> 54:3 70:11
351:22 358:15	<b>small</b> 363:12,21	83:13 84:19 98:6	<b>speaks</b> 102:5	81:19 89:1 94:21
360:18,20 361:5,8	373:2	129:3 143:19	<b>special</b> 82:16	158:13 203:16
364:11 366:10,17	<b>Smooosh</b> 165:10	155:20 169:11	190:10,20 399:12	<b>standards</b> 177:9,10
382:14 383:9	<b>smooshed</b> 162:20	231:10 233:5	415:12 446:13,14	<b>standing</b> 13:9,17
384:8 385:4	164:20	244:16 251:9	446:16	13:19 14:1,3,8,19
386:18 387:5,8	<b>smooshee</b> 165:8,10	261:14 266:20	<b>specific</b> 98:7	14:20 16:9 26:21
388:10 389:2	165:11 167:4	288:16 290:11	310:19 311:8	27:21 31:2,20
390:19 395:2	169:4,11	299:16 307:20	320:8 354:22	38:2 70:17 112:10
396:5,12,19 397:1	<b>smooshee's</b> 167:5	309:6 310:4	417:6	114:9,18 115:13
397:4,7,18 398:1	<b>smoosher</b> 165:5,6	314:14 316:9	<b>specifically</b> 31:18	116:3,5 123:15
402:19 403:17	165:16,22 167:1	331:17 358:9	353:12	130:3 138:9
404:17	169:1,8 170:21,22	359:6 395:14	<b>speculate</b> 286:6	154:13 176:1,3
<b>sister</b> 106:17,17	172:6	400:15 401:13	<b>speculating</b> 67:4	184:4,20,21
107:9 169:4,11	<b>smooshing</b> 167:15	402:5 423:15	<b>speculation</b> 66:14	196:18 319:12
170:8 371:22	<b>Smothers</b> 333:1,1	448:11	124:6 125:19	383:16 427:20
<b>sister's</b> 109:2,4	<b>smushed</b> 106:16,18	<b>sort</b> 19:6 324:8	286:5	438:16 443:14
<b>sit</b> 38:15,16 369:17	<b>smushing</b> 148:9	421:17 445:19	<b>speech</b> 351:6	445:7
369:18	<b>snowy</b> 202:22	450:10	<b>spell</b> 6:21	<b>standpoint</b> 139:11
<b>sits</b> 20:6 79:14	<b>so-called</b> 412:10	<b>sorts</b> 93:4	<b>spend</b> 96:8	<b>start</b> 20:2,10,11,16
<b>sitting</b> 132:15	<b>SOD</b> 339:4 393:17	<b>sound</b> 354:9 357:15	<b>spent</b> 342:2 446:5	20:18,19,21 26:21
187:2 280:19	393:22 398:3	<b>sounded</b> 54:8	<b>spoke</b> 11:3 62:11	32:19 43:3,4 94:9
<b>situated</b> 245:18	399:12 400:7	<b>sounds</b> 186:11	103:16 108:12,14	96:13,15 138:14
<b>situation</b> 10:5	411:14	287:4 457:21	129:13,15 144:1	205:9 210:20
37:11 55:17 66:10	<b>soft</b> 428:17	<b>source</b> 74:17	163:8 297:21	367:21 385:16
137:5 277:20	<b>sole</b> 396:3,6,7	412:19	368:2,15 402:12	406:9 428:19
280:9 407:2	<b>SOMB</b> 6:18,22	<b>Southeast</b> 187:21	404:15	434:21
411:14 414:21	80:7	<b>SOV</b> 368:7	<b>spoken</b> 279:20	<b>started</b> 25:2,3,5
415:5 421:5	<b>somebody</b> 10:4	<b>SP</b> 324:4	352:11,12 403:19	26:18 31:8 32:9
436:22 437:17	15:17,21 22:2	<b>space</b> 83:4	<b>spreading</b> 398:19	43:8 46:2 71:20
450:7 455:9,10	68:11 70:1,16	<b>speak</b> 11:21 99:1	<b>stabbed</b> 451:3	72:2,5,6,11
456:11 458:4	104:7 120:4	103:20 104:11,14	<b>stabbing</b> 386:7,11	126:20 129:16
<b>situations</b> 65:19	131:21 132:4	123:12 143:19,20	401:10	181:15 187:3,6,7
410:6 423:19	147:13 188:22	143:22 163:4,7,12	<b>Stadium</b> 31:13	189:2 196:2 197:3
<b>six</b> 159:15 212:2	382:16 440:20	163:20 164:2,10	453:7	197:17 368:10

369:12 373:4,19 383:13,20 391:6 435:18 437:13 <b>starting</b> 45:3 96:12 161:5 225:5 279:2 <b>starts</b> 354:18 364:9 379:2 <b>state</b> 5:6 69:2 89:14 101:21 105:5 145:14 159:5 218:22 339:20 352:8 354:6 363:11 421:19 <b>stated</b> 28:21 49:20 51:19 52:3,5 58:9 72:8 85:15 136:19 139:1 144:3 178:3 178:11 200:17 226:16 228:11,13 230:1,13 246:2 280:11 296:12 308:22 309:16 315:16 318:7 333:4 342:11,14 347:21 353:1,8 355:18 357:1 360:22 364:9 391:21 397:15,20 402:12 411:6 435:12,14,16 449:8 451:13 <b>statement</b> 2:6,6 236:15,21 237:4 245:22 275:7,18 310:14 313:9,10 360:4,5,22 363:11 364:9 373:16 394:12 435:19 <b>statements</b> 60:19 283:15,17 319:10 401:22 411:4 413:18 <b>states</b> 321:11 345:5 346:6 378:22 <b>stating</b> 57:8 226:15 228:9 242:7 354:5 363:17	<b>station</b> 97:14 114:8 114:16 <b>stationed</b> 86:9 153:10 374:5,10 <b>status</b> 61:5 <b>statuses</b> 61:3 <b>stay</b> 65:14 73:12 112:18 193:4 <b>stayed</b> 13:16 19:11 56:5 109:21 145:8 193:1,2 417:18,20 443:8 <b>stays</b> 442:1,7,15,16 442:17 <b>step</b> 312:9 363:15 442:3 <b>stepped</b> 189:1 373:18 <b>steps</b> 20:9 36:21 38:3,16,16 42:20 62:16 138:10 162:5 181:1 187:2 291:17 294:10 382:16,17 383:5 384:2 <b>stick</b> 333:8 344:17 <b>stood</b> 10:9,13 23:12 23:18 46:6,8 48:5 <b>stop</b> 50:17 429:20 <b>stopped</b> 23:11 33:10 441:16 <b>stopping</b> 442:18 <b>stops</b> 354:18 <b>story</b> 298:16 440:21 <b>straight</b> 41:14 98:15 <b>straws</b> 456:22 <b>stream</b> 213:12,19 217:3 224:17 225:18 228:4,7 229:15 234:15 235:3 <b>street</b> 1:14 10:8 14:2,3,7 25:4 28:3 30:22 31:3,6,11 31:12 32:10 33:11	34:2 36:1,3 38:11 39:9,15 43:14 44:2,9,10,15,19 45:15 47:14,15 70:9,18 79:3,9,12 83:11 155:3,5 171:11,14 182:13 190:8 191:13,17 192:8,19 193:13 195:19 339:5 364:19,22 369:18 373:18,22,22 374:6,11,20 375:8 375:15,19 376:5 384:12 419:14 427:9,11,15 428:4 428:22 452:18,21 453:5,8,9,20 <b>stretcher</b> 191:12,14 195:20 196:2,7 <b>stricken</b> 449:2,4 <b>strike</b> 261:14 <b>strikes</b> 411:20 <b>string</b> 208:19 210:13 218:9 220:20 221:1 <b>stringent</b> 177:10 <b>struggling</b> 446:7 <b>stuff</b> 16:16 41:1 43:21 344:21 451:19 <b>style</b> 427:4 <b>subject</b> 5:19 159:9 161:18 173:10 248:19 278:1 291:8 292:17 294:22 299:18 317:16 331:10 <b>submission</b> 324:4,4 413:17 <b>submissions</b> 320:12 <b>submit</b> 325:8 326:15 360:3 394:3 <b>submitted</b> 201:1 324:19 327:12 360:13,15,19	380:9 405:5 <b>submitting</b> 327:8 <b>subpoenas</b> 379:18 <b>subsequent</b> 293:10 <b>subsequently</b> 294:11,12 <b>subtotal</b> 256:10 <b>sudden</b> 102:5 343:12 <b>suddenly</b> 305:16 446:18 <b>sufficient</b> 7:17 <b>suggest</b> 91:15 312:6 <b>suggestion</b> 436:17 441:7 <b>suggests</b> 440:6 <b>suit</b> 289:17 330:5 353:2 377:11 <b>summary</b> 1:6 3:4 158:6 159:9 286:16 310:20 311:6,9 317:1,17 318:1,8 319:17 320:6 321:14 408:22 413:16,17 414:8 <b>superfluous</b> 429:11 439:15 <b>Superior</b> 286:11 289:13 378:18 <b>Superseding</b> 237:9 <b>supervise</b> 96:6 <b>supervising</b> 96:8 <b>supervision</b> 436:21 <b>supplied</b> 413:13 <b>support</b> 248:19 249:7 388:5 391:8 <b>supported</b> 293:17 <b>supporting</b> 193:15 <b>supposed</b> 97:7 306:2 369:9 404:1 410:4 431:17,21 433:2,11,16 455:21 <b>supposedly</b> 100:18 <b>sure</b> 47:20 53:7	64:21 70:10 76:8 85:20 87:13 92:9 94:20,22 97:6,7,8 124:12 125:6,15 137:5 144:13,15 144:19 151:4 164:22 206:8 238:16 277:22 278:3 283:4,14 285:1 323:15,15 324:16 329:18 343:21 344:3,19 345:14 353:14 355:14 357:19 358:7,9 359:21 368:7 370:14 377:22 380:1 394:7 398:22 399:2,17 404:15 429:8 448:19 <b>surveillance</b> 198:4 293:21 298:1 364:18 365:4 372:13 373:2 386:12 <b>survived</b> 119:19 <b>suspension</b> 1:7 3:5 158:6 159:9 284:5 284:7 286:17 310:20 311:6,10 317:2,17 318:2,8 318:8 319:17 320:6 321:14 329:17 392:13 394:21 408:22 413:16,17 414:8 458:17 <b>Sustained</b> 48:22 111:2 120:13 124:8 127:17 180:3 <b>swinging</b> 78:5,7 <b>sworn</b> 5:1 89:7 158:22 <b>system</b> 199:1,3 203:19 <b>systems</b> 199:15
--	---	---	---	---

<b>T</b>				
<b>T</b> 264:3 266:14,16 267:2,5	121:20 123:21,22 126:12,20 142:12 281:21 306:3 314:12,15,16 331:12 342:2 343:11 355:13,16 366:11 367:11 374:9,20 380:3 382:10 403:18 449:14 451:1	<b>tenuis</b> 379:20	56:17 57:8 62:13 66:6 74:10,20 85:17,19,21 96:16 102:12 124:10,13 125:2,4,22 143:4 143:5,12,18 144:19,20 145:9 145:18 153:19 154:7 155:18 177:18 181:20 194:22 276:21 281:2 283:2,19 284:9 286:14 290:13 304:6,12 304:18 306:19 307:2 324:13,22 329:1 334:22 335:21 337:4,8,11 338:16 339:20 350:13 352:2,22 353:1,17 358:22 363:1 364:12 373:16 375:13 399:1 408:4 410:1 414:3 421:6,22 422:14 423:7,10 423:11 429:11 438:3 441:1 452:6 452:7,7,11	230:13,17 232:14 234:6 236:13 237:11 238:22 241:2 242:4,11 246:5 249:1,15 251:4 260:16,17 275:22 288:17 289:8 299:16 308:5,15 309:22 312:11 317:6 355:5 367:2 375:20 381:21 391:17,18 395:9 395:10 400:1 405:14 444:13 447:22 448:1 460:15,16
<b>T,U,V</b> 2:17	<b>talks</b> 441:19	<b>territory</b> 301:18	<b>thank</b> 4:5 29:9 35:18 37:15 38:13 49:18 51:16 67:16 70:22 74:12 75:4 75:22 83:20 88:14 88:18 89:11 103:13,13 112:6 129:2 133:6 135:20 150:8,16 154:16 155:9,14 157:21 159:4 160:20 182:4 195:10,11 203:18 203:21 210:2,19 211:5,10 214:2 215:20 218:7 222:22 223:13 225:17 226:18,22	<b>thanksgiving</b> 234:22 <b>Thanks</b> 234:19 <b>thereof</b> 258:7 295:8 <b>thing</b> 69:11 111:8 122:5 149:4 167:7 343:6 373:20 392:17 421:3,20 429:7 446:8 451:6 453:18 454:20 458:3 <b>things</b> 17:11,14 43:22 61:20 69:6 69:16 93:6 95:5 96:21 97:2 124:12 126:22 189:15 330:22 331:1,13 332:2 342:3 391:11 410:21 423:8 431:9 436:14 448:22 449:16 450:12 <b>think</b> 14:20 49:7 66:9,16,20,22 74:14,16,19 79:17 80:22 82:13 88:10 95:8 102:1,11,18 110:17,18 125:16 130:11 134:9 136:8,18 141:6 146:14,15 154:18
<b>t/a</b> 1:6	<b>tall</b> 43:17 48:11	<b>testified</b> 5:2 62:1 71:5 89:7 124:11 124:14 125:8 154:18 158:22 179:7 195:1 271:4 276:12 295:18 332:19 399:6 427:8		
<b>table</b> 3:13 331:18 331:21 332:1	<b>tape</b> 198:5 373:8 453:9	<b>testify</b> 66:17 181:17 285:3,15 314:7 452:10		
<b>tainted</b> 283:18	<b>taught</b> 449:12	<b>testifying</b> 88:5,8,8 400:3		
<b>take</b> 42:22 105:16 105:19 152:8 156:10,20,21 200:10 238:8,22 286:15 298:17 303:20,21 304:7 308:3 323:19 354:4 372:15 379:16 393:21 409:4 448:2 459:3 459:20	<b>taxes</b> 433:15 434:7	<b>testimony</b> 10:14 15:22 16:20 17:3 17:8 35:13 49:19 49:20 51:18 52:3		
<b>taken</b> 107:18 123:10 161:10 162:3 163:16,18 163:22 164:6 169:21 172:4 175:13 191:6 211:5 330:18 363:4,6 371:17 386:4 392:19 398:11 432:6	<b>taxpayers</b> 455:3			
<b>takes</b> 451:21	<b>taxpaying</b> 430:9			
<b>talk</b> 18:17 19:13,15 69:12,13 92:5 99:11 106:9 115:1 115:6 119:5,7 123:16 135:7 138:11 142:8 165:1 197:5 283:5 296:21 419:15 440:18 453:11	<b>TCB</b> 319:6			
<b>talked</b> 48:19 63:19 108:15 114:20 115:2 145:9 327:3 374:4 413:7 428:9 441:3 452:3	<b>team</b> 121:22 246:5			
<b>talking</b> 52:4 53:4 78:3 86:14 94:9 105:10 107:12	<b>technician</b> 187:15 440:19			
	<b>tell</b> 69:20 70:10 81:4 83:3 87:5 108:18 112:14 120:10,15 129:10 130:2 143:5 150:20,21 173:5 186:3 196:15 199:2 208:11 209:7 214:15 220:14 228:2 255:4 261:13 266:2 269:8 275:5 291:8 298:16 318:19 334:17 352:6 370:17 381:2 388:13			
	<b>telling</b> 26:22 178:12 410:16			
	<b>temporal</b> 305:11			
	<b>tend</b> 196:6 294:6			
	<b>tended</b> 193:6 391:4			
	<b>tendered</b> 249:8 258:21 259:3 280:18			
	<b>tends</b> 64:20			

156:5,14 157:12 157:19 161:15 175:15 176:3 183:1 194:15,21 200:15 202:14 203:5 224:21 275:10 277:18 282:8 286:8 292:8 295:21 302:8 303:1 304:21 305:6,22 306:18 307:5 309:10 312:2,16 324:18 330:20 332:8,8 338:5 344:4,13 347:5 349:17 350:16 353:20 354:3 360:11 362:3 368:2 370:1 371:3 374:5,12 375:12,13,15,21 376:19 386:5 391:20 393:6 395:2,4 401:9,16 402:6 403:7,17,21 404:19 405:19,20 405:22 411:18 420:13 443:22 448:4 460:10 <b>thinking</b> 167:8 389:16 390:1 <b>third</b> 229:18 346:17 394:2 414:7 <b>thoroughfare</b> 428:1 <b>thoroughly</b> 289:20 289:20 <b>thought</b> 19:14 24:18 30:16 112:9 116:3 135:3 180:12 238:13 369:20 377:6 389:9 <b>thoughts</b> 88:3 <b>thousand</b> 306:4 368:16 455:17	<b>thousands</b> 306:5 432:18,18 <b>threat</b> 302:2 385:6 <b>threatened</b> 19:3 <b>threatening</b> 22:8 24:13 30:12 408:13 <b>threats</b> 279:20 298:3 299:2,10 302:7,15 <b>three</b> 4:15,18,19 23:16 33:7 36:15 36:16,16 55:21 56:7,8,14,15 71:17 133:14 153:4,7 182:12 281:17 296:12 352:5 364:4 372:19 390:6 413:15 434:18 <b>three-quarters</b> 372:22 373:6 374:13 <b>threw</b> 69:8 279:15 382:15 <b>throwing</b> 294:9 <b>thrown</b> 11:20 64:18 291:16 <b>tie</b> 39:11,11 <b>tied</b> 40:9,10 390:11 <b>till</b> 206:14 <b>time</b> 10:15 11:18 13:4 14:15 15:4 16:2 17:16 20:1 38:17 39:12,13,16 39:17,18 40:10 41:17 42:9 45:6 46:5,6,14,15 47:18 52:16 59:1 62:6,17 71:6,10 71:19 96:7 98:3 98:18 118:17 123:5,17 127:14 127:20 129:17 131:13 138:5,20 141:6,11 143:7 153:12,17 154:1	154:12 156:11,19 156:22 162:1,15 163:15,17,21 164:3,4 165:20 166:18,21 168:21 169:6,13 170:17 171:9,13,22 174:10 175:4,9,16 176:2,12 181:7 184:5 188:17 190:5 191:12 195:18 197:11,17 197:22 200:8 201:12,13,19 202:1,21 203:1 204:9 206:11 207:10 213:8 230:18 235:8 240:16 241:9 242:21 246:17 248:21 249:4 256:6 264:16 265:10 268:3,5 272:18 273:12 278:5 283:17 293:15 297:15 298:2 299:1 305:10,20 318:21 324:9 329:8 334:10,21 335:2 336:12 339:3,7 342:2 351:10 352:1 357:18 358:17 360:22 361:13 362:19 364:14,15 368:8 369:10 380:2 383:15 385:5,7 393:5 397:20 398:5 403:2,4 408:21 413:3 432:9 434:1 437:16 445:10 453:12,15 457:14 <b>times</b> 62:16 198:7 200:7 352:10,12 414:7	<b>timesheets</b> 215:15 221:14 232:12 236:5 <b>tip</b> 366:22 <b>title</b> 90:2 312:22 <b>titles</b> 380:11 <b>today</b> 3:21 4:16 5:20 14:20 154:7 159:10 291:5 317:19 324:13 329:2,12 358:22 440:18 460:12 <b>told</b> 10:7 18:2,9 38:15,15 39:4,17 81:9,10,19 82:10 98:15 101:4 105:11,17 106:12 106:15 108:19,20 108:21 131:22 132:9 138:13 149:15 164:18,21 167:21 172:9,22 173:21 176:20 178:17 186:12 187:5 188:19 191:16 192:13,13 196:11 197:8,16 198:5 202:17 213:3 215:17,17 330:9 336:12 370:12 454:17 <b>tolerated</b> 167:16 <b>tone</b> 15:15,15 <b>tonight</b> 426:17 434:20 <b>top</b> 209:1 252:20 379:6 380:13 <b>total</b> 91:6 153:4 256:5,13 <b>totally</b> 298:12 <b>totals</b> 268:15,16,17 <b>touch</b> 40:6 148:6,8 148:11 <b>touches</b> 367:1 <b>touching</b> 148:7 240:15 <b>town</b> 441:18	<b>track</b> 284:20 <b>tracks</b> 25:5 373:7 <b>traction</b> 445:10 <b>trading</b> 3:20 <b>traffic</b> 14:9 110:15 420:19 428:9 <b>trail</b> 240:2 446:9 <b>trailer</b> 381:16,20 <b>train</b> 95:13 145:16 373:6 422:17 <b>trained</b> 396:16 422:16 <b>training</b> 6:4 7:5,7,9 7:11,13 90:13 91:7,22 95:3 145:10 147:18 149:14 187:10 395:7 422:2,3 423:2 436:20 <b>transaction</b> 399:12 <b>transcribe</b> 17:10 <b>transcript</b> 304:19 316:20 333:2 <b>transition</b> 430:2 <b>transpired</b> 124:3 164:12 172:20 180:6 203:9 294:17 435:5 <b>transport</b> 196:3 <b>treated</b> 429:20 <b>treating</b> 187:11 190:15 191:9 373:17 376:18 <b>treatment</b> 133:4 188:13 <b>trickle</b> 385:16 <b>tried</b> 69:9 130:16 180:9 284:21 <b>trouble</b> 16:3 170:17 420:21 <b>troubling</b> 422:5 <b>trough</b> 113:11 <b>true</b> 213:13 216:1 245:15 246:18 <b>trust</b> 450:3 456:14 <b>truth</b> 177:19 305:3 <b>truthful</b> 178:4
---	--	--	--	--

236:14,21 237:4 <b>try</b> 53:20 67:9 69:6 69:17 91:12,13 92:5 97:10,19 99:7,8 112:2,5 119:8 132:2 149:4 150:3 298:11 342:20 445:19 <b>trying</b> 18:5,17 19:13,15 20:15 23:14 24:7 25:6 34:7,14,17 35:13 46:13,22 60:20 62:15 69:12,13,14 75:21 115:10 126:18 133:8 147:11 156:13 179:15 303:13 313:16 335:13 336:3 351:2,3 361:19 388:5 399:10 431:5 444:19 452:15 <b>tune</b> 245:13 <b>tunnel</b> 85:10,11 <b>turn</b> 118:18,19 369:10 383:22 385:15 430:12 <b>turned</b> 141:13 383:10 385:11 428:18 <b>Turner</b> 226:10 <b>turning</b> 7:20 23:1 98:5 103:18 221:4 224:19 229:17 230:8 241:11 248:2 269:19 298:1 <b>Twenty-two</b> 187:17 <b>twice</b> 389:16 <b>two</b> 4:17 20:5,5,8,8 20:16 23:13 27:6 27:7 35:4 39:9 40:7 56:11,12 68:10,18,19 76:3 98:10,13,13,14 99:14 100:2,9	101:6 103:14,16 103:19 108:10,13 108:14 111:6 119:17 120:1 130:20 145:21 150:12,13 153:11 156:11 161:8 162:2,13 164:1 176:4 182:14 189:5 197:19 200:16 201:9 244:21 246:9 250:20 255:5 256:17 263:3 268:11,12,16 303:8 352:5 369:16 384:3 388:6 395:4 397:22 399:8 443:6,7 446:19 <b>two-day</b> 407:11 <b>type</b> 51:13 328:20 354:15 409:3 410:13 420:7 450:15 455:8 <hr/> <b>U</b> <b>U</b> 265:3 266:14,16 267:2,5 <b>U.S</b> 217:22 225:11 379:9 <b>ugly</b> 441:17 <b>Um-hum</b> 269:4 <b>unarmed</b> 61:3,6,7 <b>unaware</b> 350:12 397:5 <b>Unconventional</b> 92:19 <b>underage</b> 69:15 388:22 435:2,4 <b>undergo</b> 7:4 <b>underlying</b> 292:16 <b>understand</b> 10:14 16:20 17:3 33:16 35:12 65:4 82:15 91:13 96:16 107:1 122:19 124:13	125:7,10,12,14 284:13 292:14 295:10 303:14 329:16 335:6,14 343:22 344:3,20 354:22 355:14 357:20 360:10 365:19 392:11,12 393:4 <b>understandable</b> 125:17 354:3,12 <b>understanding</b> 21:7 119:8 312:15 329:19 344:20 <b>understands</b> 125:8 136:9 <b>understood</b> 391:22 399:3 <b>unfortunate</b> 408:9 <b>unfortunately</b> 407:17 414:5 <b>unfriendly</b> 183:16 <b>uniform</b> 7:11 80:19 265:3 428:10 453:11,15 <b>uniformed</b> 80:10 80:13 190:7 191:14,19 <b>unique</b> 101:3 <b>unit</b> 195:19 196:3 416:21 <b>United</b> 378:22 <b>unknown</b> 386:11 <b>unleading</b> 120:19 <b>unrealistically</b> 437:18 <b>Unreliable</b> 298:8 <b>unruly</b> 383:13 390:21 <b>unsupported</b> 436:3 <b>unusual</b> 149:5 <b>unwanted</b> 148:7,8 148:11 <b>up-to-date</b> 325:5,8 <b>update</b> 324:12 <b>updated</b> 326:3,6 327:10,12	<b>updating</b> 325:13 <b>upset</b> 18:14,16 102:6 106:22 119:10 120:3,5,6 120:7,16 121:8,16 127:4,5,6,8 141:19 142:21 143:3 176:21 177:1 178:19 179:4 180:19 181:4 297:16 361:20 362:4 384:19 <b>upstairs</b> 394:5 <b>use</b> 93:13 95:13 369:21 396:8 398:7 419:2 <b>ushered</b> 437:13 <b>usual</b> 66:8 <b>utter</b> 420:18 <hr/> <b>V</b> <b>V</b> 265:15 266:15,16 267:2,5 <b>vacuum</b> 427:17 <b>valet</b> 451:2 <b>valuable</b> 368:11 397:16 <b>varies</b> 384:8 398:4 <b>various</b> 43:5 310:13 <b>vehicle</b> 27:14,15 119:13,15 176:22 362:5 435:16,17 <b>vehicles</b> 27:3,9,12 369:19 <b>vendettas</b> 455:12 <b>venue</b> 162:14 168:8 206:6 291:17 294:5 296:8 299:9 310:5 343:13,14 343:15 361:21 375:6,10 382:21 383:1 384:21 385:5 397:16 426:20 <b>venues</b> 368:15	<b>verbal</b> 142:16,18 143:11 <b>verifying</b> 244:22 <b>version</b> 271:5 418:6,13 <b>versus</b> 277:20 282:1 <b>veteran</b> 443:1 <b>vicinity</b> 417:20 <b>victim</b> 189:4 192:20,22 <b>victims</b> 133:22 408:16 443:4 <b>Victor</b> 265:16 <b>video</b> 198:10 199:21 200:9,12 200:18,22 201:9 202:11 203:17 293:21,22 356:12 364:18 408:16 436:12 437:19 440:22 445:16 453:8 <b>videos</b> 440:14 441:8 <b>videotape</b> 62:8,9 <b>view</b> 184:3 202:22 <b>viewed</b> 417:8 <b>violation</b> 314:21,22 439:22 440:1 447:11 <b>violence</b> 75:10 304:9 415:14 416:7 425:1,5,10 425:12,21 426:7 426:13 429:3 450:9 451:10 452:1 <b>violent</b> 415:8,19 451:13 458:2 <b>visibility</b> 369:16 370:1 <b>visual</b> 174:17 <b>vocal</b> 418:2 <b>voiced</b> 279:20 447:18 <b>voices</b> 20:4
--	---	--	--	--

<b>void</b> 411:8	364:10 435:13	456:1	414:19 459:3	<b>welcome</b> 382:1
<b>volition</b> 205:17	<b>walkway</b> 31:7 41:8	<b>Washington</b> 1:14	<b>we're</b> 29:5 53:21	<b>went</b> 26:21 36:10
309:5	41:9,10 70:19	388:8	142:11 157:7	41:2,14,19 42:1
<b>voluntarily</b> 276:18	113:4	<b>wasn't</b> 12:13,15,18	158:4,8 208:3	44:2 62:17 72:9
309:2,5,17	<b>wall</b> 387:4,7	18:16 20:13 30:2	210:14 238:7	88:16 114:17,19
<b>voluntary</b> 439:10	<b>Walter</b> 3:11	65:1,3 74:5,7	239:5,9 287:7,10	115:1,6 116:16,18
439:12,20,21,22	<b>wandering</b> 403:22	75:16,17 109:8	287:12,18,22	117:5 118:4,22
440:3	<b>want</b> 35:3 55:16	116:13 121:15	302:20 308:9	131:19 132:1,9
<b>vote</b> 459:3,21 460:7	68:4 76:8 79:14	130:6 142:4	311:18 312:2	133:16 134:16,16
	80:6 82:1 83:15	144:13,15 168:11	314:12,16 317:18	158:1,2 170:9,11
	83:22 84:15 87:15	174:2 179:2	328:17 329:12	174:20 176:16
	115:11 123:19	204:20 205:5	343:11 352:4	186:12,14 193:9
	136:10 137:5	238:16 329:11	355:16,17 357:20	196:22 198:3
	149:4 156:12	365:6,7 377:16	358:8 382:4,9	200:20 239:2
	206:14 207:15	383:1 384:22	395:3 403:22	305:12 308:7
	238:14,15 246:17	387:21 388:1,3	418:6,17 422:10	343:14 345:8
	285:14,15 287:3	393:16 409:14	434:20,21 446:22	371:4 381:12
	292:11,18,19	437:20	449:11,12,14	393:10 406:13,14
	293:9 302:6 312:4	<b>watch</b> 94:21 95:18	450:22 457:20,22	419:14 443:8
	315:18 329:17	96:2 431:16 446:2	457:22	445:15 453:4
	342:1 343:15,21	<b>watched</b> 200:13	<b>we've</b> 156:11 219:2	<b>weren't</b> 138:7
	343:22 344:2	<b>watching</b> 31:5	224:21 287:18	372:3 400:14
	345:14 351:11	365:4	329:7 408:21	428:8,8 429:3
	352:20 353:19	<b>water</b> 43:7,7	410:10,11 416:21	444:14
	357:19 359:18,21	<b>wave</b> 71:21	417:3 419:17	<b>Western</b> 427:18
	362:8 367:7	<b>waved</b> 195:20	430:1 458:15	<b>whatsoever</b> 16:3
	380:18 389:6	<b>way</b> 12:11 13:15	<b>weapon</b> 93:9,10	251:11 259:13
	391:14 399:2	16:11,11,22 17:1	98:2 150:20,22	297:2 411:9 437:3
	401:18 406:1,11	18:3,13,13,17	438:11	<b>wherewithal</b> 442:9
	417:6 426:3	19:13,16 20:7	<b>weapons</b> 50:20	<b>white</b> 9:22,22 10:21
	434:15 441:10	31:12 34:13 42:17	76:10 91:19 92:3	11:6,14 16:6
	444:4,7,9 447:19	46:2 48:3 64:14	92:11,17,18,19	23:15 25:12,17
	<b>wanted</b> 18:2 19:1	69:10 73:7 77:4,5	93:5,22 94:17	74:15,16
	23:17 27:4 43:6	77:5 79:20 85:15	96:9,9,19 435:7	<b>who've</b> 416:20
	80:21 84:3 110:9	96:15 105:12	<b>wear</b> 80:10,19	<b>whoa</b> 350:22,22
	162:13 167:18	106:1 127:21,22	<b>wearing</b> 9:22 74:15	351:1,1
	197:6,7 198:4,7	191:13 242:6	74:16 101:14	<b>wholly</b> 439:14
	202:9,12 206:7	283:22 328:20	173:7,8	<b>width</b> 27:18
	248:16 292:6	342:12,13 373:6	<b>website</b> 379:9	<b>WILLIAM</b> 158:19
	298:19 300:21	386:20 395:5	439:5	<b>Willie</b> 2:4 3:22
	362:7 368:19	412:5 433:20	<b>Wednesday</b> 1:11	55:11 158:14
	380:1 409:12	436:21 442:10,19	210:7 342:18	159:6 232:14
	437:22 444:3,11	446:12	<b>week</b> 103:6,7,14	234:19 235:17
	<b>wants</b> 87:22 88:1	<b>we'll</b> 16:18 22:18	124:3,15,20 257:8	236:13 242:11
	305:2 313:21	94:14 117:11	<b>weekend</b> 4:4 223:2	246:6 249:1 251:4
	441:11 446:10	150:5 157:9,19	<b>weeks</b> 256:1	<b>willing</b> 282:13
	453:2 455:16	199:19 392:18	<b>weight</b> 298:18	<b>willingly</b> 198:20



<b>11:17</b> 3:2	249:12 251:16	<b>2010-2011</b> 330:16	<b>22</b> 72:1 187:21,22	<b>272</b> 2:17
<b>11th</b> 227:3 228:16	253:4 258:14	<b>2011</b> 279:2 323:10	188:7 280:10	<b>275</b> 2:18
231:3 235:9,14	278:10 303:19	323:11,12,20	300:15 306:22	<b>276</b> 2:18
237:5	360:17 407:3	324:11 326:12,17	<b>220</b> 2:10	<b>27th</b> 378:19
<b>12</b> 36:17	408:1 409:9 435:6	326:18 327:7,19	<b>2221</b> 1:7 3:6	<b>28</b> 1:12 344:1 347:5
<b>12-251-303</b> 306:21	<b>18</b> 86:19 153:8	328:11 330:4,11	<b>224</b> 2:11	<b>29</b> 210:7
<b>12:30</b> 88:16	387:19 388:11	353:7 378:2,12,19	<b>227</b> 2:11	<b>29th</b> 213:19 221:22
<b>12:31</b> 88:17	389:4,5,7,16	382:10 400:10	<b>229</b> 2:12	222:5 223:15
<b>120</b> 365:22 366:1	<b>18-year</b> 389:4	413:21	<b>231</b> 2:12	359:14
366:12 453:3,9	<b>1st</b> 269:17 270:2,6	<b>2011-8475</b> 355:15	<b>233</b> 2:13	
<b>12th</b> 235:10		<b>2012</b> 279:3 280:11	<b>2378</b> 245:3 250:22	<b>3</b>
<b>13</b> 250:22 255:17	<b>2</b>	300:15 303:12	258:2,3 345:4	<b>3</b> 334:7,12 385:9
255:22 256:19	<b>2</b> 245:4 312:22	306:22 333:16	346:21	435:8,11
262:18 347:17	416:12	339:14 400:10	<b>238</b> 2:13	<b>3-0-0</b> 460:6
<b>136</b> 2:3	<b>2:00</b> 72:1 175:7	402:22 403:6	<b>23rd</b> 323:20 325:11	<b>3/14/14</b> 240:17
<b>13th</b> 250:22 258:4	<b>2:30</b> 16:14,15,20	411:10 415:9	326:17,18 327:7	<b>3:00</b> 71:14,16
263:6 347:15	18:12 48:4 157:8	437:16	327:19 328:11	428:13
348:7,22 349:3	157:10 385:11	<b>2013</b> 251:1 254:13	<b>24</b> 221:15 349:22	<b>30</b> 24:9 97:20 194:9
<b>14</b> 273:19	<b>2:35</b> 71:12	254:17 255:20	350:10 351:20	194:19 199:12,13
<b>14-251-00133</b> 1:10	<b>2:40</b> 72:1	261:20 305:16	<b>24-hour</b> 431:11	199:20 344:1
3:6 459:11	<b>2:45</b> 16:12 72:1	357:14 358:3,18	<b>24/7</b> 451:2	389:10 390:3
<b>14,000</b> 228:12	118:20,21 140:3	377:9	<b>244</b> 2:14	391:5,6,12,13,15
232:11 348:9	153:19,20,22	<b>2014</b> 1:9,12 199:21	<b>2449</b> 245:7 251:1	<b>30-day</b> 343:11
358:6	175:15	210:8 213:1 215:7	346:6 347:2,5	<b>30-word</b> 354:17
<b>14th</b> 1:14 319:18	<b>2:47</b> 363:1,18	216:3 218:18	348:6 349:16	<b>300</b> 209:18 374:18
319:19 432:22	371:17,18	221:22 222:10	392:3 404:16	394:1 411:18
433:4	<b>2:48</b> 417:13	223:3 235:14	405:6	<b>301</b> 2:19
<b>15</b> 91:6 93:5 95:5	<b>2:50</b> 71:12 154:8	237:5,14 240:9	<b>247</b> 2:14	<b>308</b> 2:4
95:16 130:13	<b>2:51</b> 158:3	244:17 247:1	<b>25</b> 156:22 240:9	<b>30th</b> 212:21 213:19
141:5,16 145:8	<b>2:55</b> 154:9	248:10 252:19	273:22	<b>31st</b> 269:14,21
153:3 154:5 321:2	<b>20</b> 87:11 187:22	253:2 255:17,22	<b>25-826(b)</b> 459:2	270:5
321:13 418:8	257:7 268:9	256:19 257:7	<b>250</b> 194:2,20	<b>32</b> 243:9,10
443:1	391:13 443:22	262:18 264:11	<b>2509(e)</b> 438:18	<b>350</b> 409:17 427:10
<b>157</b> 249:3,4	448:3	265:9 266:1 268:9	<b>251</b> 401:17	428:6
<b>157s</b> 245:2 248:19	<b>20-page</b> 445:4	271:8 272:17	<b>251-00145</b> 317:5	<b>396</b> 2:4
<b>159</b> 2:4	<b>200</b> 194:1	273:19,22 305:19	<b>252</b> 2:15	<b>3rd</b> 209:16
<b>16</b> 84:17 199:4,14	<b>2000</b> 1:14	345:16 347:15,17	<b>253</b> 2:15	
199:15 345:6	<b>20002</b> 1:14	348:7 349:1 358:1	<b>2565</b> 241:9 242:5,8	<b>4</b>
<b>160</b> 375:6	<b>2008</b> 310:8,9	358:3,19 360:6,17	242:14 265:20	<b>4</b> 71:6,7 192:15
<b>16th</b> 103:4	367:19	400:9	<b>25th</b> 243:15	221:16 261:20
<b>17</b> 1:9 86:3 248:8	<b>2010</b> 90:1,2 311:5,9	<b>20th</b> 258:16 271:6	<b>260</b> 2:16	271:7
253:2 360:6	311:18,22 316:3	345:15 347:22	<b>2623</b> 218:1 225:11	<b>4/9/14</b> 250:19
416:10	316:21 318:6,17	<b>21</b> 388:16,17	236:9,17 271:2,5	<b>4:00</b> 48:4,5 327:16
<b>17th</b> 7:21 9:15	318:19 319:18,19	389:15,17 390:1,2	<b>2624</b> 272:14 273:6	328:8
10:19 98:7 160:11	320:4,7,10 321:2	391:10	<b>263</b> 2:16	<b>4:01</b> 239:2
160:22 201:7,14	321:13 459:8,13	<b>214</b> 2:9	<b>2651</b> 404:18	<b>4:02</b> 239:3
204:12 205:2	459:16	<b>216</b> 2:10	<b>267</b> 2:17	<b>40</b> 72:1 97:20 194:9

194:9,19 387:19 446:5,5 <b>40-year</b> 388:12 389:7 <b>400</b> 2:4 <b>405</b> 459:7 <b>405(b)(13)</b> 459:15 <b>405(b)(4)</b> 459:12 <b>407</b> 2:6 <b>434</b> 2:6 <b>448</b> 2:7 <b>49</b> 2:3 <b>4s</b> 192:16 <b>4th</b> 241:12,13,14 241:15 243:4 263:6	<hr/> <b>8</b> <hr/>			
	<b>8</b> 221:16 254:17 255:20 265:9 280:12 <b>8:26</b> 460:18 <b>84</b> 2:3 <b>89</b> 2:3 <b>8th</b> 243:15			
	<hr/> <b>9</b> <hr/>			
<hr/> <b>5</b> <hr/>				
<b>5</b> 2:3 <b>5:18</b> 308:7 <b>5:36</b> 308:8 <b>50</b> 190:12,12 <b>500</b> 146:15 427:9 427:11 428:4 452:12 <b>509</b> 313:1 <b>5D</b> 342:22 <b>5th</b> 196:11 215:7 216:3 245:4				
<hr/> <b>6</b> <hr/>				
<b>6</b> 272:17				
<hr/> <b>7</b> <hr/>				
<b>7</b> 218:18 254:13 303:19 <b>7,689</b> 228:12 <b>7:07</b> 399:1 <b>7:14</b> 406:14 <b>7:20</b> 406:15 <b>7:42</b> 235:10 <b>72</b> 459:1 <b>76</b> 2:3 <b>7689.36</b> 237:3 <b>78642</b> 1:7 3:7 <b>7th</b> 219:6 224:21 225:6 227:2				

C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: The Scene

Before: DC ABRA

Date: 05-28-14

Place: Washington, DC

was duly recorded and accurately transcribed under  
my direction; further, that said transcript is a  
true and accurate record of the proceedings.

*Neal R Gross*

-----  
Court Reporter

**NEAL R. GROSS**

COURT REPORTERS AND TRANSCRIBERS

1323 RHODE ISLAND AVE., N.W.

WASHINGTON, D.C. 20005-3701