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VIDEOTAPED INTERVIEW

ERIN O'DONNELL

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APPEARANCES:

Scott Gardner
John Saraya
Patrick D'Angelo
Jeffrey Follmer
Steve Kinas

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1 MR. SARAYA: I'm John Saraya with BCI.
2 We are working on this with -- in a task
3 force-type fashion. What we've done is, we've
4 kind of got almost like a panel interview. We've
5 got some questions that we're going to go through
6 that everyone gets asked the same thing.

7 Please don't feel funny if we ask
8 certain questions. We're trying to get you to go
9 into details, make sure we're getting all the
10 information we can from you. And there are going
11 to be a couple questions I'm sure that will be
12 kind of an eye-roll-type thing.

13 It's not that we're belittling you or
14 second-guessing you or anything like that. It's
15 just, like I said, we're trying to elicit details
16 here, making sure that we're getting all the
17 information we need. Okay?

18 THE WITNESS: Okay.

19 MR. GARDNER: I'm Scott Gardner. I'm a
20 detective/sergeant with East Cleveland. I'm
21 assigned to Major Crimes.

22 Just like he stated, we're -- we're not
23 here to judge what happened. We have no opinion
24 one way or another. We truly are just trying to

1 attempt to find out what happened.

2 I'm assuming probably your union reps
3 have advised you that, I mean, we are going to
4 read you your Miranda warning. It's not because
5 you're a suspect. It's just a formality at this
6 point that it be done. All right?

7 THE WITNESS: Okay.

8 MR. GARDNER: You have the right to
9 remain silent. Anything you say can and will be
10 used against you in a court of law. You have a
11 right to consult with an attorney and have an
12 attorney present during questioning. If you
13 cannot afford an attorney, one can be provided to
14 you before questioning at no cost.

15 Do you understand these -- each of the
16 rights?

17 THE WITNESS: Yes.

18 MR. GARDNER: With these rights in mind,
19 do you wish to speak to us now?

20 THE WITNESS: Yes.

21 MR. GARDNER: Again, like I said, it's
22 sort of standardized questions that we're just
23 going to run down. We've asked everyone before
24 you. We're going to ask primarily the same

1 questions to everybody after you.

2 EXAMINATION

3 BY MR. GARDNER:

4 Q. Let's get off -- what's your first name?

5 A. Erin, E-R-I-n, O'Donnell, O apostrophe
6 D-O-N-N-E-L-L.

7 Q. Okay. And where -- where do you live
8 at? This isn't public information. It's going
9 to be redacted. But it's part of the report.

10 A. [REDACTED]. Do you want an address?

11 Q. Yes.

12 A. [REDACTED].

13 Q. [REDACTED]

14 A. [REDACTED] [REDACTED]
15 [REDACTED].

16 Q. What's the zip out there?

17 A. [REDACTED].

18 Q. What's a good contact number for you?
19 You have a cell phone or --

20 A. Cell, [REDACTED].

21 Q. Date of birth?

22 MR. D'ANGELO: We missed that on the
23 last person.

24 A. [REDACTED].

1 Q. All right. First question, just how are
2 you holding up at this point?

3 A. Okay.

4 Q. What -- what's your current assignment
5 there at Cleveland?

6 A. Third District Vice detective.

7 Q. And are you assigned to a specific shift
8 or --

9 A. It's Fourth Platoon hours, usually 1800
10 to 0200.

11 Q. Do you remember what it was on Thursday?
12 Was it those hours, 1800 to 0200?

13 A. Yes.

14 Q. Your shift supervisor?

15 A. Sergeant Putnam, P-U-T-N-A-M.

16 Q. And he was working that day or --

17 A. Correct.

18 Q. What are -- what's your regular -- do
19 you have regular days off, or how does that work
20 for you?

21 A. It varies monthly. In November we were
22 off Saturday, Sunday; but it --

23 Q. That doesn't seem like too bad of a
24 deal.

1 A. No. It -- that's the first Saturday,
2 Sunday we've had in a while. Usually it's
3 Sunday, Monday. But they're trying to work stuff
4 out with the new captain and new commander.

5 Q. Do you work any extra-duty detail,
6 overtime?

7 A. Yes. I work at Tower City.

8 Q. Is that like a -- is that through the
9 City? Off-duty? Part-time deal?

10 A. It's off-duty secondary employment.
11 Commander Stevens runs it.

12 Q. And when was -- on Thursday were you
13 working within 48 hours?

14 MR. SARAYA: Tuesday to Wednesday did
15 you work that detail?

16 THE WITNESS: Can I check my book?

17 MR. SARAYA: Sure.

18 THE WITNESS: I think I did work that
19 day.

20 MR. SARAYA: Whatever you need to do.
21 Relax. This is a formality.

22 THE WITNESS: That was the 29th? Yes.

23 MR. SARAYA: Yes.

24 THE WITNESS: I did.

1 MR. SARAYA: You did work it on the
2 29th?

3 THE WITNESS: Correct. I worked 12 to
4 1800. Went from there straight into work.

5 BY MR. GARDNER:

6 Q. How are you feeling that night? Were
7 you groggy? Tired? Alert? How was your --

8 A. I was fine.

9 Q. Fine?

10 A. Yeah.

11 Q. Any -- any sickness, cold, flu?

12 A. No.

13 MR. SARAYA: Jump back for one minute.

14 What's -- how long have you been at
15 Cleveland PD?

16 THE WITNESS: I'm going into my
17 fifteenth year.

18 MR. SARAYA: Anywhere before that, any
19 other agencies?

20 THE WITNESS: No. Stay-at-home mom.

21 MR. SARAYA: Big jump stay-at-home mom
22 to being a cop.

23 BY MR. GARDNER:

24 Q. Were you taking any medications,

1 prescribed, over-the-counter?

2 A. [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 Q. [REDACTED]

6 MR. SARAYA: [REDACTED]

7 THE WITNESS: [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 MR. SARAYA: [REDACTED]

11 [REDACTED]

12 THE WITNESS: [REDACTED]

13 BY MR. GARDNER:

14 Q. [REDACTED]

15 A. [REDACTED]

16 [REDACTED]

17 Q. Do you normally wear glasses or
18 contacts?

19 A. No. I do have them, but I don't usually
20 wear them.

21 Q. Just to sort of clarify, I mean, you
22 don't need them or --

23 A. Once in a while for reading or on the
24 computer, but for the most part I can see very

1 well without them.

2 Q. And I somewhat remember you were in
3 plainclothes that night, correct?

4 A. Yes.

5 Q. Tell -- tell -- remind me, how were you
6 -- how were you dressed?

7 A. I had jeans on, a sweatshirt. I had my
8 black Body Armor vest that has pockets in the
9 front that says Police across the front and the
10 back. And I had a jacket, blue jacket, over the
11 top; and it had a Police on the left breast.

12 Q. What -- what do you normally carry as
13 far as non-lethal, lethal? I mean, what do you
14 have on you?

15 A. My taser. I have my handcuffs. I have
16 extra magazines. Hand sanitizer. Do you want me
17 to do the whole thing?

18 Q. No. I mean --

19 A. Flashlight. The usual. The flashlight,
20 then the drug bags.

21 Q. More so looking for what kind of
22 weapons, like less than lethal.

23 A. And then my Glock.

24 Q. Did you have pepper spray, anything like

1 that?

2 A. I did carry my pepper spray, and lately
3 I haven't been because I put an extra flashlight
4 in.

5 Q. It's always amazing to me when -- you've
6 been on the road a little while longer than I
7 have -- but when I was on the road I always had
8 Purell that would hang from my belt. Everybody
9 would also ask, "Well, what's that green thing?"
10 They didn't care what anything else was. You
11 just said hand sanitizer, so....

12 Didn't have any backup firearms or
13 anything like that?

14 A. No.

15 Q. How did you carry -- I mean, were your
16 magazines -- what condition were they in? Were
17 they fully loaded?

18 A. Fully loaded in my pouch right in front.

19 Q. What -- I can't remember what weapon you
20 had there. How many did you have in each
21 magazine?

22 A. Fifteen in the Glock 19.

23 MR. KINAS: You carried a Glock 19?

24 THE WITNESS: (Affirmative nodding of

1 head.)

2 Q. So 15, 15, and 16?

3 A. Correct.

4 Q. And the magazines are carried in the
5 pouch on the exterior or --

6 A. Yes, in my center pouch.

7 Q. Did you have any personal recording
8 devices or anything like a tape-recorder or --

9 A. No.

10 Q. Some people have the little movie
11 cameras. Anything like that?

12 A. No.

13 Q. Let's talk about your car. What -- it's
14 an unmarked car?

15 A. Yes.

16 Q. What kind of car is it?

17 A. It's a black Taurus. It has lights in
18 the front and the rear, the red and blue.

19 Q. Equipped with siren?

20 A. Yes.

21 Q. Everything working that night okay?

22 A. Yes, it was.

23 Q. Anybody else in the car with you?

24 A. Yes. Detective Demchak was driving.

1 Q. Demchak?

2 A. D-E-M-C-H-A-K.

3 Q. No personal dash cam or anything in the
4 car?

5 A. No.

6 Q. What channel do you guys operate on?

7 A. Tac 3.

8 Q. Tac 3?

9 A. (Affirmative nodding of head.)

10 MR. SARAYA: That's not the Third
11 District channel. That's -- that's not the
12 channel for all the zone cars, or is that --

13 THE WITNESS: No. It's an extra
14 channel, because we do a lot of undercover work
15 and we don't want to tie up radio or the air. We
16 usually have one on regular three.

17 MR. KINAS: (Inaudible)?

18 MR. SARAYA: That's fine. That's why I
19 wanted to clarify.

20 MR. KINAS: Channel 3, you have the Alt
21 channel, and then you have the Tac channel. The
22 Alt channel will allow you to hear any of the
23 channels that are there but only broadcast on its
24 own.

1 MR. SARAYA: Okay.

2 MR. KINAS: The Tac channel is dedicated
3 to itself, so you can only hear if your both
4 radios are on the Tac. And the same with
5 Channel 3.

6 MR. SARAYA: Gotcha.

7 BY MR. GARDNER:

8 Q. So how were you able to -- were you able
9 to hear the pursuit traffic or --

10 A. No. My partner and I had just finished
11 up booking a male we had arrested just prior to
12 10:30. We had just left the Justice Center after
13 booking this male and had just pulled into the
14 Third District parking lot when we observed
15 Sergeant Putnam and Detective Ereg running to
16 their car. And Sarg had his AR15, so we knew
17 something serious was happening.

18 Q. Just so I'm understanding, on Tac 3,
19 though -- during the pursuit were you hearing
20 information on Tac 3 or --

21 A. No. We had turned our radio off,
22 because when you go up into the jail I usually
23 have my personal radio that's in my vest on
24 regular channel; and then the car radio's on Tac.

1 I had turned my personal radio off, because up in
2 the jail it bleeps and it makes noise because it
3 says Out of Range.

4 So I had turned it off and not turned it
5 back on when we got back in the car, because we
6 knew we were just heading back to the district to
7 do paperwork.

8 Q. Do you have any specialized training in
9 any like SWAT, anything that's --

10 A. Other than the regular classes that I've
11 taken, no. I've done some private training. I
12 worked two 90-day details with the ATF.

13 Q. Prior military?

14 A. No.

15 Q. Qualified this year?

16 A. Yes.

17 MR. SARAYA: Handgun? Shotgun?

18 Anything else?

19 THE WITNESS: Both handgun and shotgun.

20 BY MR. GARDNER:

21 Q. Are supervisors -- just for my
22 knowledge, are supervisors primarily the only
23 people that have the ARs?

24 A. No.

1 Q. No. A lot of people? All right. Okay.

2 Use of force training?

3 A. Yes.

4 Q. Ever had any prior shootings?

5 A. No.

6 Q. All right. I sort of -- you're sure to
7 go into it, so just burn away for a second.

8 You guys were booking a prisoner in and
9 you were coming back down, you said?

10 A. Yeah, heading back to the Fifth District
11 -- Third District, sorry. It's the Fifth Third.

12 Q. Okay. So you see Sergeant Putnam?

13 A. Yes.

14 Q. He's running around with his AR15, so
15 obviously something's going on.

16 A. Correct. They were heading to the car.
17 We pulled up beside them, because we had just
18 pulled into the lot. We didn't even get out of
19 our cars. Pulled up beside him and said, "What's
20 going on?" And I don't remember if it was Sarg
21 or if it was Ereg that said, "They're shooting at
22 the police. Turn to Tac 2 -- or turn to Channel
23 2." And we did that and heard a vehicle pursuit
24 heading eastbound on 90. I believe at that time

1 they were approaching Chester.

2 Q. So what happened?

3 A. Once they passed Chester and we knew it
4 was pointless to head down Chester to 55th, we
5 started heading north down -- I believe we went
6 down East 105. We were determining whether we
7 should take MLK or head towards 72nd.

8 Once they stated they were trying to get
9 off at 55th but missed the exit, I said, "They're
10 probably going to get off at East 72nd, so let's
11 head that way." And we headed to 72nd.

12 Just prior to us getting to East 72nd
13 and St. Clair they came through the intersection.

14 Q. So did you actually see them at the
15 intersection at that point?

16 A. Yes.

17 Q. Okay. What happened after that?

18 A. We tried to stay -- I don't want to say
19 paralleling, but we tried to stay in the area in
20 case the suspects bailed from the vehicle. So we
21 tried to stay a couple blocks on either side.

22 Q. Do you -- what are you hearing at this
23 point on the radio?

24 A. There was someone stating that, "Be

1 careful, I believe the passenger is holding a
2 gun." We heard at one point that the passenger
3 was pointing the gun out the window. Somebody
4 else stated it was a pop can. And then moments
5 later you hear that they were loading -- it
6 appeared "The passenger was loading a weapon, so
7 be careful, keep your distance."

8 Q. And this -- is this all prior to you
9 getting to 72nd or after, or some before?

10 A. Some before. Some as they're crossing
11 through and still driving.

12 Q. So were you sort of like stationary at
13 the intersection when they drove past or --

14 A. Yes, yeah, because they were just all
15 driving; and that's when we chose to go up --
16 they went south on I believe it was Addison and
17 we went I believe south on 71st -- or 79th and
18 maybe they were at 71st.

19 Q. Did you actually see the suspect vehicle
20 at this point?

21 A. Yes.

22 Q. Did you see the occupants inside?

23 A. No.

24 Q. All right. So you -- you go off

1 somewhat, using my own words, parallel to them on
2 71st and --

3 A. On 79th.

4 Q. Oh, I'm sorry, 29th.

5 A. On seven-nine.

6 Q. Okay. And then -- then what happens?

7 A. They headed eventually eastbound on Wade
8 Park and then southbound on I'm not sure what
9 street, I think it might have been 118th, and
10 then eastbound on Euclid. Again still
11 broadcasting, you know, "Keep your distance
12 because we believe they have guns."

13 Q. What kind of -- I mean, like are you
14 seeing -- seeing them at any point? Are they
15 slowing up, speeding up? What's the suspect
16 vehicle -- vehicle doing?

17 A. The only time that I believe they slowed
18 up was on Euclid when traffic began to -- the
19 zone cars began to back up. We were pretty far
20 back in the pursuit.

21 Q. Okay. Did -- how were -- how did they
22 appear to be driving? I mean as far as were they
23 following the law pretty much or --

24 A. No. They were out of control.

1 MR. SARAYA: Who was out of control?

2 THE WITNESS: Whoever was driving the
3 vehicle, the suspect vehicle.

4 MR. SARAYA: Why do you say that?

5 THE WITNESS: No regard for human life,
6 running lights, driving not in the right lanes.

7 BY MR. GARDNER:

8 Q. So they were crossing into opposite
9 lanes of traffic?

10 A. Yes. They were doing whatever they
11 could to get away from the police at that time.

12 Q. May sound like a stupid question.

13 Do you have any doubt in your mind that
14 they knew that the police were behind them or --

15 A. Oh, they knew, yes.

16 Q. All right. So we're on Euclid heading
17 eastbound. We're passing East 118th. What
18 happens then?

19 A. Someone called out to notify East
20 Cleveland. Somebody else said Cleveland Heights.
21 They're asking for spike strips, "See if anyone
22 has spike strips in the area."

23 Q. All right.

24 A. And then they made a right-hand turn --

1 I'm not sure what the name of that street was --
2 so we took the right after that.

3 Q. All right. So they made a right-hand
4 turn. You went to the next --

5 A. Correct.

6 Q. -- road, made a right.

7 A. Again, just in case a foot pursuit
8 entailed.

9 Q. If I told you the name of the street,
10 would it remind you, or --

11 A. Yes.

12 Q. -- do you not know?

13 A. No, it probably -- W.

14 Q. Wymore?

15 A. Right. And we took the street whatever
16 is right next -- east of that.

17 Q. Would it be Lee? Does that sound
18 familiar?

19 A. I believe it was.

20 Q. So then what happens?

21 A. You could see several -- I could see
22 several police cars following them down Wymore;
23 and all of a sudden one of the officers says,
24 "There's no way out." Somebody might have said,

1 "This is a deadened. Be careful."

2 And as we're coming up, you could see
3 cars heading down. I told my partner to hold up,
4 not to go any further south on Lee, because if
5 they bailed they were going to come towards us.
6 Because you could see a big hill, and I figured
7 it would be harder for them to go up the hill.

8 We stopped right there, and you could
9 see the congestion backing up -- I could see the
10 congestion backing up with the cars.

11 I told my partner to hop the curb and
12 head over that way. And as we were hopping the
13 curb, I heard a couple of shots; and you heard at
14 least one person, possibly two different people,
15 state, "They're shooting at us."

16 As we pulled the car a little bit
17 further westbound, the car was still coming
18 towards the police cars that were kind of --

19 Q. I'm going to -- I'm going to show you an
20 overview photo just for everybody's benefit here.

21 This is Lee road here. This is the
22 access. It doesn't really show it too well on
23 this. This is the access drive that comes up
24 from Wymore.

1 A. Okay.

2 Q. This is --

3 A. This is Lee.

4 Q. -- Lee Road.

5 So you guys -- when you say you guys
6 hopped the curb, right in here, like in here?

7 A. We hopped the curb here and came right
8 into this area.

9 Q. In the grass?

10 A. It was on the grass, correct.

11 Q. And this is where you start -- when do
12 you -- I don't want to put words in your mouth.

13 When do you start hearing shots fired?

14 A. Just as we're coming up over the curb
15 you could hear -- I heard a couple shots.

16 Q. Heard it or heard it on the radio or
17 both?

18 A. No, both. I heard it outside the car.
19 And I told my partner, "Be careful." And we came
20 up over, and the congestion started right in this
21 area with the cars. And at that point we kind of
22 ducked down, because we didn't know where --
23 which way the shots were going to go.

24 They said that they're firing, we knew

1 the car was coming back, so we figured, you know,
2 depending on who's firing, they could be coming
3 any way.

4 My partner pulled a little bit further
5 forward, and we hear a few more pops as we're
6 getting out of the car.

7 There was, I'm not sure exactly where it
8 was, but a police car right here. I'd say we
9 were right in this grass area here. And I went
10 to the front door of the police vehicle that's
11 over here, and it was pretty much --

12 MR. SARAYA: Let's use this one now.
13 How about that? You've got the car we want
14 there. Okay? This is our suspect vehicle.

15 THE WITNESS: Right.

16 MR. SARAYA: Okay. So go ahead and draw
17 on there to your heart's content of where you
18 guys were about.

19 THE WITNESS: Do you want where our car
20 was originally?

21 MR. SARAYA: Where your car is at.
22 Where you got out on foot.

23 THE WITNESS: I believe our car was
24 right about here.

1 MR. SARAYA: Okay.

2 THE WITNESS: Might have been a little
3 bit further, like there.

4 MR. SARAYA: Okay.

5 THE WITNESS: We -- I got out on foot
6 and went to the front of this car here.

7 MR. SARAYA: Okay.

8 THE WITNESS: I'm not sure if there was
9 another car here or not, but I know that I had a
10 clear shot from the front of this car to the
11 passenger.

12 MR. SARAYA: Okay.

13 THE WITNESS: As I took cover by the
14 front of that car, I looked to see behind,
15 because somebody started yelling, "Crossfire.
16 Watch crossfire." There was nobody over in the
17 playground area. I looked to the vehicle, and
18 now numerous shots were ringing out; and I could
19 see the driver and the passenger both moving. I
20 thought the driver was shooting, and it looked to
21 me like the passenger was reloading.

22 I drew my weapon. Again, there was
23 nobody on the other side, so I fired several
24 shots into the passenger window, which no longer

1 existed. I don't know if the window was down or
2 if it had already been shattered.

3 MR. SARAYA: Do you know how many shots?

4 THE WITNESS: I shot 12 times. I
5 thought I shot 5 or 7.

6 MR. GARDNER: And you said at the
7 passenger window, but it wasn't actually there
8 anymore at this point?

9 THE WITNESS: Correct.

10 MR. SARAYA: When you got -- when you
11 walked up to this cruiser here, when you took
12 your position, was that window still intact at
13 that time or was it already gone by the time you
14 got there?

15 THE WITNESS: I believe it was already
16 gone.

17 MR. SARAYA: Okay.

18 BY MR. GARDNER:

19 Q. Originally you thought it was five to
20 seven?

21 A. Correct.

22 Q. And then how do you know that it was
23 12?

24 A. When they asked us to remove our

1 magazine.

2 Q. Do you remember who asked for that?

3 A. I do, but I'm drawing a blank on his
4 name. He's got a brother that's on the job.

5 MR. KINAS: Stacho?

6 THE WITNESS: Yes, thank you, Stacho.
7 Sergeant Stacho.

8 MR. KINAS: Tim Stacho.

9 MR. GARDNER: S-T- --

10 MR. KINAS: A-C-H-O. Internal Affairs.

11 BY MR. GARDNER:

12 Q. Did he take your whole gun, just the
13 magazine, or what?

14 A. He -- he took the whole weapon and then
15 asked for my other magazines, and then he
16 returned them after they checked to see how many
17 rounds were fired.

18 Q. How long do you think -- again, just in
19 your opinion, how long do you think the shooting
20 was going on for?

21 A. Seconds.

22 Q. Do you know where your -- where your
23 partner was at this point?

24 A. I do not.

1 Q. Do you know who was -- well, let me ask
2 you, was there anybody at the driver's side of
3 this cruiser?

4 A. Yes, there is.

5 Q. Who was that?

6 A. I -- I don't know him well. Beeler?
7 Biler? I didn't know his name at the time.

8 Q. He was at that driver's side of that
9 patrol car?

10 A. Correct.

11 Q. Did you see any other officers around --

12 A. Detective Ereg was to my immediate left,
13 and he was yelling out, "Cease fire."

14 Q. That was towards the -- at which point
15 was he yelling?

16 A. Towards the end of the shooting. There
17 weren't too many rounds going off by then.

18 Q. Did you see a gun or hear gunfire from
19 the suspect's vehicle?

20 A. I believed I heard gunfire, yes.

21 Q. When -- when this car was coming back
22 towards this way and you were running up, did you
23 see anything else happen?

24 A. No, I didn't. Because we were coming up

1 over the curb, we didn't have a clear view.

2 There were so many cars.

3 Q. Did you see it strike the other police
4 car?

5 A. I heard over the radio that he struck
6 several police cars.

7 Q. Along the way -- I mean, I understand
8 that, again, my words. You were paralleling the
9 pursuit in most of the regards. But at any point
10 did you see anything being thrown from the
11 vehicle or -- suspect vehicle?

12 A. No, I did not.

13 MR. SARAYA: Okay. I'm going to jump
14 back here a second.

15 You come up to where the marked unit is
16 at. You said you -- you thought the driver was
17 firing. What -- what gave you that impression?

18 THE WITNESS: Because I saw the
19 passenger's hands or arms that were down towards
20 the lap, which made me believe that the passenger
21 was reloading. And due to the numerous amount of
22 shots that were occurring, I believed that the
23 driver was shooting at the police officers and
24 the police officers were responding or returning

1 fire.

2 MR. SARAYA: Okay. Thank you.

3 BY MR. GARDNER:

4 Q. How would you describe your proximity to
5 the vehicle during the pursuit?

6 A. We were pretty far back. There were
7 numerous cars in front. And, again, when we --
8 because we were trying to stay off a block or
9 two. Usually there might have been one car with
10 us, maybe two.

11 Q. How would you describe traffic during --
12 let's start with maybe the early part of the
13 pursuit. How would you describe the traffic on
14 the streets?

15 A. For the most part the side streets were
16 clear. The only part that was congested was
17 Euclid; but by the time we came through, cars
18 were pulled over.

19 Q. When did you become first aware of the
20 sex and race of the occupants?

21 A. After the shooting.

22 Q. You knew it was a male and a female at
23 that point?

24 A. I believed it was two males.

1 Q. Have you heard the names by this point
2 or --

3 A. I have.

4 Q. Names sound familiar to you? Have you
5 ever had dealings with them in the past?

6 A. Not to my knowledge.

7 Q. Have you seen pictures of them?

8 A. Yes.

9 Q. You don't recognize them? Don't
10 remember them from any other calls or any other
11 situations or anything?

12 A. Not that I recollect, no.

13 Q. Okay. How would you describe the
14 lighting at the scene here?

15 MR. SARAYA: Your interpretation.

16 A. It was somewhat lit, but it was still
17 pretty dark.

18 MR. SARAYA: Okay. Now you've got to
19 explain that answer.

20 A. There were lights, but I believe they
21 were off on either side in the distance. They
22 weren't like a streetlight right up above.

23 MR. SARAYA: Okay. What about with all
24 the patrol cars there?

1 A. Other than all the red-and-blue lights?

2 MR. SARAYA: Uh-huh.

3 A. Distracting. But my focus really wasn't
4 on the lighting. I --

5 MR. SARAYA: Okay.

6 Q. Did you issue any verbal commands?

7 A. No.

8 Q. Did you hear anyone else issue verbal
9 commands?

10 A. Yes. Detective Ereg. And there were
11 quite a few coming off from the northeast.

12 Q. Anything that stands out, I mean, as far
13 as your memory what they were saying?

14 A. "Cease fire."

15 I guess I did issue one. When I went to
16 check after somebody else ceased fired and the
17 firing had stopped, I walked over to the
18 passenger, because I was so close, I was going to
19 check for a pulse, but there was so much glass
20 and blood; and I didn't have gloves and it didn't
21 appear that the passenger was alive. And then I
22 walked over towards the driver side.

23 Someone was coming up with a shotgun;
24 and I just said, "Don't shoot me." And I checked

1 the driver and -- was about to check the driver;
2 and, again, the same, so much glass and blood and
3 I didn't have gloves. And someone was yelling,
4 "Call the EMS."

5 Q. Did you hear -- did you hear any of the
6 officers issuing commands to the suspects?

7 A. I don't recall.

8 MR. SARAYA: If you don't know, it's
9 okay to say. All right?

10 Q. You somewhat answered the question. But
11 did you observe weapons from the suspects or --

12 A. When I went to look at them, no, I did
13 not.

14 Q. So the movements -- any other movements
15 that -- you were saying that you were pretty
16 close to the passenger. Did you see her doing
17 anything else? You said she was making some sort
18 of movement, it looked like she was reloading.
19 Anything else that you can remember?

20 A. No. When she stopped moving -- well, I
21 say "she" because I didn't know at the time but
22 now I do. When the passenger stopped moving is
23 when I stopped shooting.

24 Q. Do you know where -- and again this

1 is --

2 MR. SARAYA: Subjective.

3 Q. -- an often subjective insensitive sort
4 of question. But do you know where your rounds
5 were hitting?

6 A. I'm not 100 percent, but I believe I did
7 hit the passenger.

8 Q. Do you know where?

9 A. Center mass is what I was aiming for.

10 Q. Some of these questions are the
11 questions he's referring to where you're welcome
12 to reach across and slap me on the face on some
13 of them. Okay?

14 But was there any other availability or
15 practicality of other options?

16 A. None that I could tell.

17 MR. SARAYA: Okay. Let's back up a
18 second here.

19 You're standing and you just get out of
20 your car. All right? Were rounds already flying
21 as you're getting out of the car?

22 THE WITNESS: They were, yes.

23 MR. SARAYA: Okay. So the -- outside of
24 engaging, there's no other practical options, get

1 back in your car and drive away or anything else.

2 That's what I'm -- that's what we're getting at.

3 THE WITNESS: Oh, absolutely not --

4 MR. SARAYA: Okay.

5 THE WITNESS: -- other than getting back
6 in my car and leaving, and I -- I wasn't going to
7 do that.

8 MR. SARAYA: Drawing up in a fetal
9 position or anything like that.

10 THE WITNESS: Right.

11 MR. SARAYA: Okay.

12 BY MR. GARDNER:

13 Q. Any other observations that sort of
14 stick out in your mind as far as other officers'
15 actions? Anything that struck you funny up
16 there?

17 A. No.

18 Q. You said that somebody was calling -- or
19 shouting out to call for EMS. Did you call for
20 EMS?

21 A. No.

22 Q. Do you know who called for EMS?

23 A. I do not.

24 Q. After -- after the shooting and things

1 subside, what are you doing at this point?

2 MR. SARAYA: Your actions after the
3 shooting. Did you reload your gun?

4 A. No. I went down and checked to see how
5 they were. And then several supervisors were
6 arriving on scene and asking anyone who shot to
7 stand in this area and non-shooters to go to
8 another area.

9 Prior to that fire came through, and I
10 just asked if they could get by our car -- or by
11 the car that was in there, parked up on the side;
12 and they said that they could get through.

13 MR. SARAYA: Where were they going?

14 THE WITNESS: To check on -- I guess
15 they were called in connection with the shots
16 fired.

17 MR. SARAYA: After the fact were you
18 injured at all?

19 THE WITNESS: No.

20 MR. SARAYA: Flying glass? Stray round
21 hit you in the vest or anything like that?

22 THE WITNESS: No.

23 MR. SARAYA: No?

24 BY MR. GARDNER:

1 Q. Do you remember what -- do you remember
2 any specific statements afterwards from what
3 everybody's talking about afterwards or --

4 A. Other than the fact that there were a
5 lot of shots fired and people were hitting the
6 ground, that was --

7 Q. After this happened you guys are sort of
8 lined up. I guess the supervisor had you lined
9 up the shooters, non-shooters.

10 Is anybody making any statements that
11 come to mind?

12 A. No.

13 Q. Since the incident obviously you've
14 talked to union reps, you've talked to the
15 attorney. Have you spoken to anyone else
16 regarding this incident? Before you answer, it's
17 not a bad thing that you did. I just need to
18 verify and know that you've talked to somebody.

19 A. I talked to my dad. Then I talked to my
20 best friend, Marjorie. She used to be on the
21 job.

22 Q. Have any of the officers contacted you
23 or have you contacted any of the other officers
24 that were involved in this incident after?

1 A. Only to see if everybody's okay.

2 MR. SARAYA: Do you know which officers
3 those were that you guys were checking? Is this
4 like everybody's checking in with each other or
5 somebody in particular?

6 THE WITNESS: My partner, Detective
7 Demchak. Detective Ereg. We talked to our
8 sergeant. He made sure we were okay. And then a
9 couple of other guys from the unit called.

10 MR. SARAYA: That weren't involved in
11 it?

12 THE WITNESS: Correct.

13 MR. SARAYA: Okay.

14 BY MR. GARDNER:

15 Q. Were you yourself in fear of your
16 safety, safety of others?

17 A. Absolutely.

18 Q. Can you describe a little bit?

19 A. When the shots rang out, it was do I
20 crawl into the glove box of my car or do I get
21 out there and assist my fellow officers? And I'm
22 not a coward, so I got out there to help.

23 Q. Scared?

24 A. Absolutely. I just know I had a better

1 angle, because I wasn't right in front of the
2 car. Or I believed I had a better angle.

3 Q. Do you believe your actions were
4 consistent with training?

5 A. Yes.

6 Q. Do you think that everyone's actions
7 there that night was consistent with training?

8 A. Yes.

9 MR. SARAYA: All right. These are two
10 eye-rollers now. All right?

11 Has anyone asked you to lie or otherwise
12 try to influence your statements to us?

13 THE WITNESS: No.

14 MR. SARAYA: Everybody's carrying cell
15 phones with cameras. Anybody pulling them out
16 and taking pictures at the scene or anything like
17 that that you saw?

18 THE WITNESS: Not to my knowledge.

19 MR. SARAYA: Okay.

20 BY MR. GARDNER:

21 Q. Did you make any calls from the scene?

22 A. Yes. I called my daughter. Couldn't
23 get ahold of her. And then I called my dad and a
24 mom. And when I couldn't get ahold of my

1 daughter, because I didn't know that I would be
2 home in time to drive her to school, I called my
3 aunt, who stays at my house.

4 Q. Is there anything else that we skipped
5 that you think is important that we should know?

6 A. No.

7 MR. SARAYA: Counsel, do you have
8 anything?

9 MR. D'ANGELO: Sergeant Putnam, your
10 supervisor, was he present on the scene? Do you
11 see him?

12 THE WITNESS: Yes.

13 MR. D'ANGELO: That's all.

14 MR. GARDNER: Go ahead.

15 MR. KINAS: What was your call number,
16 your call sign?

17 THE WITNESS: 3 Victor 83.

18 MR. KINAS: (Inaudible) never ask that
19 (inaudible) everybody else.

20 You guys went to Channel -- from Channel
21 3 to Channel 2. Did you stay on Channel 2 for
22 the entire duration of the incident?

23 THE WITNESS: Yes.

24 MR. KINAS: And your partner was driving

1 the car?

2 THE WITNESS: Yes.

3 MR. SARAYA: Let me see if I have
4 anything here. I have several other pages of
5 notes.

6 MR. KINAS: You guys are killing a lot
7 of trees.

8 MR. SARAYA: Through the State we get it
9 wholesale, believe me.

10 MR. D'ANGELO: Do you mind if we step
11 out a second?

12 MR. SARAYA: Absolutely. Absolutely.

13 (Pause in proceedings.)

14 MR. D'ANGELO: Upon reflection of the
15 question did she take a picture, she took a
16 picture on her cell from a distance.

17 I guess when you located a vantage point
18 when you --

19 THE WITNESS: Where we first came in.

20 MR. D'ANGELO: And that was triggered by
21 the question about another officer. So to answer
22 that question --

23 MR. SARAYA: Okay. So you took a
24 picture.

1 MR. D'ANGELO: And that was triggered by
2 the question about another officer.

3 So answer that question.

4 MR. SARAYA: So you -- you took it on
5 your phone?

6 THE WITNESS: Yes.

7 MR. SARAYA: From -- okay. Give me the
8 point of view again. You're parked up here?

9 THE WITNESS: Yeah. It's probably right
10 in this area.

11 MR. SARAYA: Up from where you -- from
12 where you fired.

13 THE WITNESS: Correct.

14 MR. SARAYA: Do you still have that on
15 your -- on your phone?

16 THE WITNESS: I believe I do.

17 MR. SARAYA: Check that for me.

18 THE WITNESS: (Checking phone.)

19 MR. D'ANGELO: And as you're doing that,
20 explain the other matter.

21 THE WITNESS: My partner who was next to
22 -- well, coworker who was next to me at the time,
23 Detective Ereg, took one closer up; and I asked
24 him to send it to me, and he did.

1 MR. SARAYA: Did you send this picture
2 anywhere?

3 THE WITNESS: No.

4 Here's the photo that I took.

5 MR. SARAYA: Okay. This was your point
6 of view from that night?

7 THE WITNESS: Correct. Did it go black?

8 MR. SARAYA: No. It's okay. Some of
9 these you can rotate them through. Okay. No
10 problem. All right.

11 Do you have a problem signing a consent
12 for me so we can walk back to Cyber Crimes and
13 they can pull that picture off of your phone?

14 THE WITNESS: No, that's fine.

15 MR. GARDNER: Do you -- is there another
16 photograph? Do you have that still?

17 THE WITNESS: Yes.

18 MR. KINAS: Could you just e-mail that
19 photo up to Cyber Crimes?

20 MR. SARAYA: Technically (inaudible)
21 evidence we're supposed to pull it.

22 MR. KINAS: I just figured it would be
23 easier.

24 MR. SARAYA: Probably.

1 MR. D'ANGELO: What, to forward it?

2 MR. SARAYA: Yeah. Let me double-check.
3 I would rather pull it just to follow evidentiary
4 procedures. It's just real simple. We just want
5 one picture off of here -- two -- two pictures.
6 The one that --

7 MR. GARDNER: And we're not requesting
8 anything else on the phone.

9 MR. SARAYA: Yeah, we're not going to
10 carve through anything else.

11 THE WITNESS: It's all pretty much
12 photos from part-time and --

13 MR. GARDNER: I don't care about that.

14 MR. SARAYA: I want that and the one
15 that Ereg sent you.

16 MR. D'ANGELO: So this is the one that
17 you took?

18 THE WITNESS: Right. That's where I was
19 shooting from.

20 MR. D'ANGELO: Okay. Where is the other
21 one?

22 THE WITNESS: (Pulls up picture on the
23 phone.)

24 MR. SARAYA: And it's a Verizon?

1 THE WITNESS: Yes.

2 MR. SARAYA: What make phone?

3 THE WITNESS: Samsung.

4 MR. GARDNER: Is that the other photo?

5 THE WITNESS: Yes. (Shows photograph.)

6 MR. SARAYA: Okay. I'll pass this over
7 to you. You can read the legalese. (Hands
8 paper.)

9 Let me walk back to Cyber Crimes and
10 give them the heads-up we're going to want them
11 to pull two pictures for us.

12 Leave that here right now.

13 MR. FOLLMER: Oh, okay.

14 MR. SARAYA: That's fine. All it says
15 is you're granting us consent to go through all
16 the cyber stuff and we're going to keep the image
17 -- a copy of the image.

18 (Pause in proceedings.)

19 (Mr. Saraya and Mr. Follmer exit the
20 interview room.)

21 MR. D'ANGELO: I just want to confirm
22 that this is just for these two photos. It talks
23 about all this other jargon.

24 MR. GARDNER: Yeah, I don't -- this is

1 their form, so I'm not familiar with it.

2 (Reviews document.)

3 Let me see if I can just have him --
4 would you feel more comfortable if he just added
5 here two --

6 MR. D'ANGELO: Only -- only the two
7 photos, nothing else. That seems to be broad.

8 MR. GARDNER: I'm sure it's like a
9 generic form that they use.

10 MR. D'ANGELO: Uh-huh.

11 (Mr. Saraya enters the interview room.)

12 MR. GARDNER: John, can we put
13 more-specific language on here just -- it's only
14 those two photos?

15 MR. D'ANGELO: The letter is pretty
16 broad.

17 MR. SARAYA: It is. Because I just went
18 back, and they said basically for the software
19 they've got to bump everything to pull those
20 images out.

21 MR. D'ANGELO: Well, we don't consent to
22 that. I mean, we'll -- we're happy to forward it
23 to you.

24 MR. SARAYA: Well, the other

1 alternative, then, is then we're going to seize
2 it and go get a warrant.

3 MR. D'ANGELO: Yeah.

4 MR. GARDNER: Do you maybe want to have
5 a discussion with him? If there's maybe anything
6 else on the phone, maybe you want to have a
7 discussion with him in private.

8 THE WITNESS: There's not.

9 MR. D'ANGELO: Well, let's have a
10 conversation in private.

11 THE WITNESS: Okay.

12 MR. D'ANGELO: We're not going to
13 destroy evidence. That's why we're having the
14 conversations.

15 So you're saying they're going to -- so
16 I understand, they're going to, like, take
17 everything --

18 MR. SARAYA: They just do a full dump of
19 the phone and we'll pull those pictures off.

20 MR. D'ANGELO: (Inaudible.)

21 MR. SARAYA: If you want, our Cyber
22 Crimes guys are in there. Or Dennis or Mark will
23 be able to explain it too.

24 MR. D'ANGELO: Okay.

1 (Pause in proceedings.)

2 MR. SARAYA: Just one more we got right.

3 (Laughs.)

4 MR. GARDNER: They require --

5 MR. SARAYA: Yeah, print and signature.

6 And, Counselor, if you could witness that also.

7 You can have that one. How's that?

8 And actually when you get done, if you
9 could initial off on that too that you -- that
10 was your doodles on that spot.

11 THE WITNESS: (Complies with request.)

12 MR. SARAYA: And signature on that one.

13 THE WITNESS: (Complies with request.)

14 MR. SARAYA: On the drawing here if you
15 could just initial off on that as well.

16 THE WITNESS: (Complies with request.)

17 MR. SARAYA: And while my brain is
18 functioning here, first page of notes for you,
19 what is your badge number?

20 THE WITNESS: 1027.

21 MR. SARAYA: Give me a few moments and
22 we'll take care of this.

23 (Mr. Saraya exits interview room.)

24 MR. GARDNER: Did you eventually move

1 your car, like after the shooting?

2 THE WITNESS: Yes. We were told by a
3 supervisor to move it.

4 MR. GARDNER: Did you pull it in front
5 of -- or pull over here?

6 THE WITNESS: Yes.

7 MR. GARDNER: Okay. Just so I know,
8 it's like the lighter-colored car, is that
9 representing where --

10 THE WITNESS: Where what?

11 MR. GARDNER: What kind of vehicle was
12 it?

13 THE WITNESS: A Taurus, black Taurus.
14 We moved onto the playground.

15 MR. GARDNER: Oh, okay, okay.

16 MR. D'ANGELO: Does it take a while to
17 do that?

18 MR. KINAS: Yeah.

19 MR. D'ANGELO: It does?

20 MR. KINAS: Yeah. Depends on actual
21 transfer rate, how many -- how much memory she
22 has on -- megabytes on the phone to transfer.

23 Did you have a lot of pictures?

24 THE WITNESS: They're all from work,

1 but --

2 MR. GARDNER: Larger than 200K?

3 THE WITNESS: No, probably not that
4 many.

5 BY MR. SARAYA:

6 Q. While they're doing that, I've got to
7 ask you a couple questions here, because
8 apparently the media is reporting that
9 supervisors went on the air and told cars to
10 break off the pursuit.

11 Did you hear anything like that?

12 A. No. I was on Channel 2. I did not hear
13 that.

14 Q. Well, that's where the whole pursuit was
15 on was Channel 2, wasn't it?

16 A. The --

17 Q. This started out on Channel 2.

18 A. Correct.

19 Q. So anything going on -- then you said
20 supervisors were present, they were involved.

21 Yes?

22 A. Correct.

23 Q. Okay. So -- but you don't remember
24 hearing anybody saying, "Break it off"?

1 A. That's correct, I do not.

2 MR. D'ANGELO: Okay. It's a sound byte
3 that was on Channel 5, the Fifth District -- a
4 Fifth District boss went on there; but that was
5 for the Fifth District personnel.

6 MR. KINAS: It was a supervisor who told
7 their cars, "Do not engage in the chase."

8 MR. SARAYA: Okay.

9 MR. D'ANGELO: That's where the media is
10 grabbing that from. The Second District did not
11 terminate.

12 In fact, Sergeant Coleman and Sergeant
13 Daley from the Second, they were part of the
14 pursuit.

15 MR. KINAS: And nobody (inaudible).

16 MR. SARAYA: Okay.

17 MR. GARDNER: So let's clarify that,
18 then.

19 Each district has its own marching
20 orders, per se?

21 MR. SARAYA: Its own chain of command?

22 THE WITNESS: Yes.

23 MR. GARDNER: Okay. So just because the
24 Fifth District boss tells Fifth District to

1 terminate, that doesn't necessarily mean for you
2 to terminate.

3 THE WITNESS: If the Fifth District boss
4 came over Channel 5, I would have not heard the
5 Fifth District boss say that.

6 MR. SARAYA: Okay. Gotcha. Gotcha,
7 gotcha. Something else I wanted to revisit here.
8 Getting to be more and more like Colombo than
9 anything else. One thing I forgot to ask.

10 You guys were running -- you're
11 parallel --

12 THE WITNESS: Yes.

13 MR. SARAYA: -- kind of paralleling
14 this. You said at one point you could see the
15 whole caravan go by. All right. Did you see the
16 suspect vehicle?

17 THE WITNESS: It depends on what
18 intersection it was.

19 MR. SARAYA: Okay.

20 THE WITNESS: For the most part, only
21 the zone cars.

22 MR. SARAYA: How many times did you --
23 were you able to see them crossing in front of
24 you or running parallel to you?

1 THE WITNESS: I don't know exactly.

2 MR. SARAYA: Okay. During the pursuit
3 did you see the suspect vehicle?

4 THE WITNESS: Initially saw it on St.
5 Clair by East 22nd.

6 MR. SARAYA: Uh-huh.

7 THE WITNESS: And maybe one other time,
8 and I'm not sure where it would have been. And
9 then not until the end.

10 MR. SARAYA: Okay. You're watching the
11 whole caravan go by, the zone cars. Any other
12 agencies you see in there, or are they all
13 Cleveland cars?

14 THE WITNESS: I believe they were
15 Cleveland.

16 MR. SARAYA: Okay. Any unmarkeds in the
17 procession that you noticed, or were they all
18 marked cars?

19 THE WITNESS: There were a couple
20 unmarked.

21 MR. SARAYA: Okay. So you didn't see
22 the highway patrol car in there or the sheriff's
23 car or anything like that?

24 THE WITNESS: No, I didn't.

1 MR. SARAYA: Okay. I think there was
2 something else.

3 This should be relatively quick. All
4 pictures are stored on an SD card in your phone,
5 so all they've got to do is pull the card, copy
6 that, and be done.

7 About how fast do you think you guys
8 were going during the pursuit?

9 THE WITNESS: I don't know.

10 MR. SARAYA: Guesstimate?

11 THE WITNESS: With -- since I wasn't
12 driving, sometimes we were going pretty fast. I
13 really have no idea.

14 MR. SARAYA: Okay. You guys were
15 running lights and siren as well as everybody
16 else?

17 THE WITNESS: Yes.

18 MR. SARAYA: Okay.

19 MR. GARDNER: I'm a little slow. Help
20 me out with this. 3 V is Third -- Third District
21 Vice?

22 MR. KINAS: Third District. You know
23 what, let me get you a call sign cheat sheet.

24 MR. GARDNER: Okay.

1 MR. KINAS: I'm also going to run you a
2 V class cheat sheet tomorrow so you'll understand
3 the V days when they say "I'm in (inaudible)
4 class" or "I'm in H," so you'll know what days
5 they have offage.

6 MR. GARDNER: Okay.

7 MR. KINAS: But that would be Third
8 District Vice.

9 Any of the eighties are vice cars. So
10 80 would be a supervisor. 81, 2, 3 would be
11 sequentially numbers by cars.

12 MR. GARDNER: So this was an 83rd vice
13 car.

14 MR. KINAS: Yeah. This wasn't
15 necessarily set shifts. The third number usually
16 designates what shift they're on.

17 MR. GARDNER: Okay.

18 MR. KINAS: Except in the case of vice.

19 MR. GARDNER: So it's shifts. Okay.

20 MR. KINAS: So -- but the 80 is your
21 sergeant.

22 THE WITNESS: Correct, 3 CM 80.

23 MR. KINAS: If the second designation is
24 an S, it's for supervisor.

1 MR. GARDNER: Supervisor?

2 MR. KINAS: And that's the standard.

3 All the CM 50s are the commanders. So 1 CM 50 is
4 First District commander. 2 CM 50 would be
5 Second District commander.

6 I'm the one that entered that, so I know
7 this best.

8 MR. GARDNER: Oh, okay.

9 MR. SARAYA: We've got the right guy
10 here, then.

11 MR. KINAS: Although it's not being used
12 the way we wrote it up for the ten-hour shifts,
13 but....

14 MR. SARAYA: Okay. Perfect. You guys
15 came up this way or you came up Lee Road?

16 THE WITNESS: We came up Lee.

17 MR. SARAYA: Okay. So let's start with
18 this one. You guys come up here and then baha'd
19 the curb here --

20 THE WITNESS: Right.

21 MR. SARAYA: -- come across this part
22 and then keep driving down the grass.

23 THE WITNESS: Correct.

24 MR. SARAYA: Okay. Gotcha.

1 I appreciate you coming out with the
2 picture on the phone. (Inaudible.) But, you
3 know, it's just one of those things because we
4 need to know what goes on.

5 There have been many a time where
6 someone grabs a picture right away at the scene
7 and by the time Crime Scene gets there things
8 have been kicked and moved and changed and
9 everything else.

10 And the flip side is nowadays is you get
11 too many people that took pictures and put them
12 up on Facebook.

13 THE WITNESS: Yeah. Well, that -- yeah.

14 MR. SARAYA: I had a case where an
15 agency asked for pictures in the case and two
16 weeks later they were on some guy's website out
17 of New York. "I know I didn't leak them. I
18 don't know where they went."

19 I called that agency for them to start
20 an internal on that, because that should have
21 never been released. So it's just one of those
22 things.

23 I appreciate people coming up and going,
24 "Yeah, I did get one. You know, I just wanted to

1 make sure this is my point of view, this is what
2 I saw."

3 THE WITNESS: Right.

4 MR. SARAYA: When you saw that whole
5 caravan go by, about how many cars were in it at
6 that time?

7 THE WITNESS: On Euclid when they went
8 by us?

9 MR. SARAYA: Sure. From where you could
10 see it there, what do you think? About how many
11 cars went past?

12 THE WITNESS: At least ten.

13 MR. SARAYA: Okay. And where were you
14 at when you saw that, on Euclid you said?

15 THE WITNESS: Correct.

16 MR. SARAYA: Okay. Did you ever get the
17 chance to broadcast any radio traffic? Did you
18 call out anything?

19 THE WITNESS: I called out -- I remember
20 the female who was calling out the chase I found
21 out later was Sergeant Coleman said, "I'm not
22 sure what street we're on," and I said, "You're
23 westbound on Dibble approaching Addison."

24 That's what I said.

1 MR. D'ANGELO: Did you say she was
2 calling out the chase?

3 THE WITNESS: Yes.

4 MR. D'ANGELO: Okay.

5 THE WITNESS: Giving directions.

6 MR. D'ANGELO: Okay.

7 MR. SARAYA: Sergeant Coleman?

8 THE WITNESS: Yes.

9 MR. D'ANGELO: She's Second District
10 Vice.

11 MR. SARAYA: Okay. I'm going to go see
12 what's going on with that.

13 (Pause in proceedings.)

14 (End of videotaped interview.)

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