

CAUSE NO. 2014-CI-07249

VALERIE REDUS, INDIVIDUALLY,) IN THE DISTRICT COURT OF
AND ROBERT M. REDUS,)
INDIVIDUALLY AND AS)
ADMINISTRATOR OF THE ESTATE)
OF ROBERT CAMERON REDUS)
VS.) BEXAR COUNTY, TEXAS
UNIVERSITY OF INCARNATE WORD)
AND CHRISTOPHER CARTER) 150TH JUDICIAL DISTRICT

VOLUME 1 OF 1
ORAL AND VIDEOTAPED DEPOSITION OF
CHRISTOPHER J. CARTER
JANUARY 15, 2021
(CONDUCTED REMOTELY)

ORAL AND VIDEOTAPED DEPOSITION OF CHRISTOPHER
J. CARTER, produced at the instance of Plaintiffs, and
duly sworn, was taken in the above-styled and numbered
cause on the 15th day of January, 2021, from 9:17
o'clock a.m. to 2:26 o'clock p.m., before Monica Victor,
a certified shorthand reporter, in and for the State of
Texas, reported by computerized stenotype machine, at
Shelton & Valadez, P.C., 600 Navarro Street, Suite 500,
City of San Antonio, County of Bexar, State of Texas,
pursuant to the Texas Rules of Civil Procedure and the
provisions stated on the record or attached hereto.

1 PLAINTIFFS' EXHIBITS (CONTD)
EXHIBIT DESCRIPTION PAGE
2 EXHIBIT 17 From the Desk of Christopher Carter 98
Chief Robert Chavez
Notice of Resignation
Effective 12/10/14
3 EXHIBIT 22 F-5 Report of Separation of License 34
Christopher Carter
City of Mathis
4 EXHIBIT 23 University of the Incarnate Word 55
Administrator/Staff Application
Christopher Carter
5 EXHIBIT 27 University of the Incarnate Word 61
Administrator/Staff Application
Christopher Carter
6 EXHIBIT 33 View Posting Summary - Police Corporal 89
Internal Position Only
7 EXHIBIT 34 To Whom It May Concern Letter from 90
Christopher Carter
8 EXHIBIT 35 November 4, 2013 Letter to Christopher 93
Carter from Luis J. Agnese, Jr.
9 EXHIBIT 42 Separation of Licensee (F-5) 101
Christopher J. Carter
University of the Incarnate Word
Police Department
10 EXHIBIT 47 The University of Texas at 13
San Antonio Undergraduate Transcript
11 EXHIBIT 48 San Antonio College Certification 18
For ASP Baton Christopher Carter
12 EXHIBIT 50 L-1 License Application 19
Christopher Carter
Marion Police Department
13 EXHIBIT 51 Report of Separation of License 20
Holder Christopher Carter
Marion Police Department

1 INDEX
2 PAGE
3 Appearances 6
4 CHRISTOPHER J. CARTER
5 Examination by Mr. Perry 10
6 Examination by Mr. Jones 130
7 Further Examination by Mr. Perry 152
8 Correction Page 155
9 Reporter's Certificates 157
10 PLAINTIFF'S EXHIBITS
11 EXHIBIT DESCRIPTION PAGE
12 EXHIBIT 1 Policy and Procedures Manual 59
November 2008
13 EXHIBIT 6 To: Memo to File 66
From: Corporal Jessica Serbantes #218
Reference: Chris Carter #208 at
high-school traffic detai
1/15/2013 4:48 p.m.
14 EXHIBIT 9 E-mail from Chris Carter 71
sent to Root, Shannon A.
Thursday, August 8, 2013 4:18 p.m.
Subject: Grievance
15 EXHIBIT 10 Handwritten Notes 73
Officer Carter
4:30 a.m. 8/12/23
16 EXHIBIT 13 August 13, 2013 Letter to 76
Christopher Carter from
Annette Tompson
17 EXHIBIT 14 Date: August 23, 2013 79
To: Officer Christopher Carter, #205
From: Corporal Jessica Serbantes #218
Re: Complaint on SAPD traffic unit 7745C

1 PLAINTIFFS' EXHIBITS (CONTD)
EXHIBIT DESCRIPTION PAGE
2 EXHIBIT 52 L-180 Report of Appointment 21
Christopher Carter
Cibolo Police Department
3 EXHIBIT 53 F-5 Report of Separation of License 23
Christopher Carter
Cibolo Police Department
4 EXHIBIT 54 Appointment of Licensee 24
Application (L-1) Bexar County
Sheriff's Office
5 EXHIBIT 55 F-5 Report of Separation of 25
License Christopher Carter
Bexar County Sheriff's Office
6 EXHIBIT 56 L-1 Report of Appointment/License 26
Agreement Christopher Carter
Atascosa County Sheriff's Department
7 EXHIBIT 58 F-5 Report of Separation of 28
License Christopher Carter
Atascosa County Sheriff's Office
8 EXHIBIT 59 Appointment of Licensee 29
Application (L-1) Christopher Carter
Bexar County Sheriff's Office
9 EXHIBIT 61 F-5 Report of Separation of 29
License Christopher Carter
Bexar County Sheriff's Office
10 EXHIBIT 62 L-1 Report of Appointment/License 31
Application Christopher Carter
City of San Antonio Marshal Unit
11 EXHIBIT 63 Separation of License (F5) 32
Christopher Carter City of San Antonio
Municipal Court Marshal Division
12 EXHIBIT 64 Appointment of Licensee Application 33
(L-1) Mathis Police Department
13 EXHIBIT 65 Appointment of Licensee Application 36
(L-1) Christopher Carter
George West Police Department

1 PLAINIFFS' EXHIBITS (CONTD)

EXHIBIT	DESCRIPTION	PAGE
2	EXHIBIT 66 Separation of Licensee (F-5) Christopher Carter George West Police Department	38
4	EXHIBIT 68 UIW Incident Report Submitted on October 12, 2013 at 1:39:33 a.m.	81
6	EXHIBIT 69 University of the Incarnate Word Officer and Weapon Information Christopher Carter	94
8	EXHIBIT 70 LEMVI Standardized Field Sobriety Recertification Christopher Carter	95
9	EXHIBIT 71 Charge Of Discrimination Christopher J. Carter	101
11	*****	
12	DEFENDANT UIW EXHIBITS	
EXHIBIT	DESCRIPTION	PAGE
13	EXHIBIT 1 Photograph	134
14	EXHIBIT 2 Photograph	135
15	EXHIBIT 3 Photograph	136
16	EXHIBIT 4 Photograph	136
17	EXHIBIT 5 Photograph	137
18	EXHIBIT 6 Photograph	138
19	EXHIBIT 7 Audio Recording	145
21	*****	

1 APPEARANCES (CONTD)

2

3 COUNSEL FOR DEFENDANT UNIVERSITY OF

4 THE INCARNATE WORD:

5 Mr. David V. Jones

6 Mr. Laurence S. Kurth

7 Mr. Matthew F. Wymer

8 Ms. Taylor R. Beaver

9 AKERMAN, LLP

10 112 East Pecan Street, Suite 2750

11 San Antonio, Texas 78205

12 Telephone: 210.582.0220

13 E-mail: david.jones@akerman.com

14 laurence.kurth@akerman.com

15 matthew.wymer@akerman.com

16 taylor.beaver@akerman.com

17

18 COUNSEL FOR DEFENDANT CHRISTOPHER CARTER:

19 Mr. Robert A. Valadez

20 Ms. Emily Ann Gearhart

21 SHELTON & VALADEZ, PC

22 600 Navarro Street, Suite 500

23 San Antonio, Texas 78205

24 Telephone: 210.349.3666

25 Facsimile: 210.349.3666

26 E-mail: rvaladez@shelton-valadez.com

27 egearhart@shelton-valadez.com

28

29 PERSONAL COUNSEL FOR DEFENDANT CHRISTOPHER CARTER:

30 Mr. Peter Gostomski

31 GOSTOMSKI & HECKER, P.C.

32 607 Urban Loop

33 San Antonio, Texas 78204

34 Telephone: 210.222.9529

35 Facsimile: 210.222.9540

36 E-mail: peter@ghlawyers.net

37

38 ALSO PRESENT:

39 Mr. Ray Aguirre, Worldwide Host

40 Ms. Kayla Brown, Videographer

41 Ms. Mary Morales, Paralegal to Mr. David V. Jones

1 APPEARANCES

2

3 MASTER IN CHANCERY

4 Mr. Roberto R. Rios

5 RIOS LEGAL GROUP LLP

6 1923 Culebra Road

7 San Antonio, Texas 78201

8 Telephone: 210.734.0034

9 Facsimile: 210.734.0266

10

11 COUNSEL FOR PLAINTIFFS:

12 Mr. Brent C. Perry

13 Mr. Zachary Carlson

14 BURFORD PERRY LLP

15 909 Fannin Street, Suite 2630

16 Houston, Texas 77010

17 Telephone: 713.401.9790

18 Facsimile: 713.993.7739

19 E-mail: bpcarlson@burfordperry.com

20 zcarlson@burfordperry.com

21

22 Mr. Mason W. Herring

23 Mr. Gramm J. Klein

24 HERRING LAW FIRM

25 2000 West Loop South, Suite 2200

26 Houston, Texas 77027

27 Telephone: 832.500.3170

28 Facsimile: 832.500.3172

29 E-mail: mherring@herringlawfirm.com

30 gklein@herringlawfirm.com

31

32 Mr. Jorge A. Herrera

33 THE HERRERA LAW FIRM

34 1800 W. Commerce Street

35 San Antonio, Texas 78207

36 Telephone: 210.224.1054

37 Facsimile: 210.228.0887

38 E-mail: jherrera@herreralaw.com

1 THE VIDEOGRAPHER: The time is 9:17 a.m.

2 We're on the record.

3 THE REPORTER: This is the oral deposition

4 of Christopher Carter, and it is being conducted

5 remotely by agreement of the parties or in accordance

6 with the Current Emergency Orders Regarding the COVID-19

7 State of Disaster, paragraphs 2.b and c. The witness is

8 located at Shelton & Valadez, P.C., 600 Navarro, Suite

9 500, San Antonio, Texas 78205.

10 My name is Monica Victor, Court Reporter,

11 CSR No. 3076, with Worldwide Court Reporters, Inc.

12 I am administering the oath and reporting the deposition

13 remotely by stenographic means. My business address is

14 3000 Wesleyan, Suite 235, Houston, Texas 77027.

15 The witness has been identified to me

16 through attestation of counsel.

17 Would counsel please state their

18 appearances and locations for the record starting with

19 plaintiffs' counsel, please.

20 MR. PERRY: Brent Perry here for the

21 plaintiffs, and I am in my office at 909 Fannin, Suite

22 4630, in Houston, Texas.

23 MR. JONES: This is David Jones for UIW.

24 Oh, I'm sorry. Did I interrupt somebody? Go ahead.

25 MR. VALADEZ: No, go ahead, David.

1 MR. JONES: Mr. Herring, did you want to
 2 announce?
 3 MR. HERRERA: This is Jorge, and I'll go.
 4 This is Jorge Herrera on behalf of the plaintiffs. I'm
 5 in a personal office at 1800 West Commerce Street,
 6 San Antonio, Texas 78207.
 7 MR. GOSTOMSKI: Peter Gostomski --
 8 MR. HERRING: Mason Herring for the
 9 plaintiffs. I'm at my office in Houston, Texas.
 10 MR. JONES: This is David Jones --
 11 MR. GOSTOMSKI: Peter Gostomski for the
 12 witness, and I am located at the Law Offices
 13 Shelton & Valadez with the witness.
 14 MR. JONES: Sorry, Peter. This is David
 15 Jones here for UI -- UIW, and I'm at my office at 112
 16 East Pecan in San Antonio.
 17 MR. WYMER: Mathew Wymer --
 18 MR. VALADEZ: Robert Valadez --
 19 MR. WYMER: -- Incarnate Word. I'm in San
 20 Antonio, Texas.
 21 MR. VALADEZ: I -- I'm going to stay silent
 22 until -- until you tell me, Monica.
 23 THE REPORTER: Go ahead, Mr. Valadez. Go
 24 ahead. That's fine.
 25 MR. VALADEZ: Okay. Robert Valadez here on

1 behalf of Chris and with Chris.
 2 THE REPORTER: Would the witness please
 3 raise --
 4 MASTER IN CHANCERY: No one else? I'll go
 5 ahead and introduce myself real quick, Monica.
 6 THE REPORTER: Okay.
 7 MASTER IN CHANCERY: My name is Roberto
 8 Rios. I've been appointed by the Court as Master in
 9 Chancery. I'm at my home office. My business address
 10 is 1923 Culebra Road, San Antonio, Texas 78201.
 11 (9:20 a.m.)
 12 CHRISTOPHER J. CARTER,
 13 Having been first duly sworn, testified as follows:
 14 EXAMINATION
 15 BY MR. PERRY:
 16 Q. Officer Carter, can you possibly adjust your
 17 screen so that it has a fuller picture of you? Is that
 18 possible? Okay. Thank you. And -- and that's -- if
 19 you're uncomfortable with it, please feel free to adjust
 20 it. I apologize. Officer Carter, my name is --
 21 MR. GOSTOMSKI: Are we ready?
 22 MR. PERRY: Yes. Are we ready?
 23 THE REPORTER: Yes.
 24 MR. GOSTOMSKI: That's good.
 25 Q. (BY MR. PERRY) Officer Carter, my name is

1 Brent Perry. Do you understand that I represent Valerie
 2 and Mickey Redus in a lawsuit that they filed against
 3 University of the Incarnate Word and yourself?
 4 A. Yes.
 5 Q. Do you understand that we're here today to take
 6 your deposition in that lawsuit?
 7 A. Yes.
 8 Q. Would you please state your name for the
 9 record?
 10 A. My name is Christopher James Carter.
 11 Q. And what is your current title with your
 12 employment so that I get it correct?
 13 A. I am not currently employed.
 14 Q. Now, there are a few rules that if we -- that
 15 if we follow we can make this go fast and make this go
 16 efficiently and -- and well today, smoothly. So let
 17 me -- let me run through those very quickly.
 18 First is I'm going to do the best I can to
 19 wait until you finish your answer for me to begin a
 20 question. And I'd like for you to offer me the same
 21 courtesy. And if either of us makes -- if I make a
 22 mistake on that, please correct me. Okay?
 23 A. Okay.
 24 Q. And then sometimes when we're taking testimony
 25 and -- as a -- as a witness, we tend to do things like

1 say "uh-huh" or "okay," which -- or shake your head
 2 which doesn't come across real well for the court
 3 reporter. So if I ask you -- ask you to give a clear
 4 answer like a yes or a no, I'm not being rude. I'm just
 5 trying to get a good transcript from you today. Can we
 6 have that agreement?
 7 A. I understand.
 8 Q. If -- if at any point today you need to take a
 9 break, please let me know, and I will accommodate you at
 10 the -- at the quickest opportunity which is usually at
 11 the end of your next answer. All right?
 12 A. I understand.
 13 Q. Have you had your deposition taken before?
 14 A. No.
 15 Q. We're here today to talk about events -- at
 16 least some of the events we're going to talk about today
 17 are emotional and tragic and I understand that. And I'm
 18 going to try to keep my questions straightforward. And
 19 if -- if at any point because of the events you need to
 20 take a break, just let me know. Because of the
 21 emotional intensity of the events, let me know and
 22 we'll -- we'll accommodate you. Okay?
 23 A. Yes.
 24 Q. Have you had time to meet with your attorneys,
 25 Mr. Gostomski and Mr. Valadez prior to this?

1 MR. VALADEZ: I'm going to object as to
 2 form.
 3 THE REPORTER: Who was that? I'm sorry.
 4 MR. VALADEZ: This is me, Robert Valadez.
 5 **Q. (BY MR. PERRY) When he says, "object as to**
 6 **form," you can answer the question.**
 7 MR. VALADEZ: I'm instructing him not to
 8 answer the question.
 9 **Q. (BY MR. PERRY) Who do you -- who is in the**
 10 **room with you today, Officer Carter?**
 11 A. My attorney, Pete Gostomski, my attorney,
 12 Robert Valadez, and Emily Gearhart.
 13 **Q. Do you have any documents in front of you?**
 14 A. Just my card for my Fifth Amendment privilege.
 15 MR. PERRY: Could we pull up Exhibit 47?
 16 THE VIDEOGRAPHER: Okay. Stand by. Would
 17 you like me to mark these?
 18 MR. PERRY: Yes, if you don't mind.
 19 THE VIDEOGRAPHER: Okay.
 20 **Q. (BY MR. PERRY) Officer Carter, Exhibit 47 was**
 21 **provided to us in the Texas Rangers' file that's been**
 22 **produced in this litigation. Can you review this and**
 23 **tell me if this is a fair and accurate copy of your**
 24 **transcript for your studies at University of Texas at**
 25 **San Antonio? And you can ask the -- the videographer to**

1 **scroll down if you need to.**
 2 MR. VALADEZ: You could also ask her to --
 3 to blow it up if you can't see it.
 4 A. Oh, can she scroll down? Can she scroll to
 5 page 2?
 6 THE VIDEOGRAPHER: If you click on the
 7 screen, you have control of this document.
 8 A. Okay. Can you repeat your question?
 9 **Q. (BY MR. PERRY) Yes. Did you earn a degree in**
 10 **criminal justice from -- I'm sorry. Is this a fair and**
 11 **accurate copy of your transcript from your studies at**
 12 **University of Texas at San Antonio?**
 13 A. Yes, it is.
 14 **Q. Did -- did you earn your degree in criminal**
 15 **justice from UTSA in December 1997?**
 16 A. Yes, I did.
 17 **Q. I have a couple of questions about the second**
 18 **page.**
 19 MR. PERRY: Kayla, you can go to the second
 20 page?
 21 **Q. (BY MR. PERRY) Okay. I note that in the last**
 22 **two semesters you made several Ds and Fs and -- and then**
 23 **only one B -- in the spring of '97. And then you had**
 24 **one B and one F in the fall of '97. Do you see that?**
 25 A. I see that.

1 **Q. Was there a reason why your grades diminished**
 2 **in your -- in your last two semesters there?**
 3 A. I don't recall why.
 4 **Q. Okay. You don't recall any particular event**
 5 **that -- that caused you to be unable to complete a**
 6 **semester or to do your studies at that point?**
 7 A. No, I don't recall. I was working full-time
 8 and -- and going to school, but I don't recall any
 9 specific event.
 10 **Q. Okay. Where were you working at that time?**
 11 A. That particular time, I don't recall exactly,
 12 but I do remember working for -- I think at the time it
 13 was called Ultramar Diamond Shamrock gas stations.
 14 **Q. And what were you doing for -- for Diamond**
 15 **Shamrock?**
 16 A. Just a general clerk, cashier.
 17 **Q. So when you graduated with your degree in**
 18 **criminal justice in December 1997, did you seek a job in**
 19 **that field?**
 20 A. No, I did not.
 21 **Q. What sort of job did you seek?**
 22 A. I was recruited by Cash America International.
 23 **Q. Okay. So were you hired by Cash America**
 24 **International?**
 25 A. I was.

1 **Q. What did you do for -- for that company?**
 2 A. I was -- I was a manager trainee.
 3 **Q. And what does a manager trainee do?**
 4 A. Manage the stores that dealt with pawnbroking
 5 and retail sales.
 6 **Q. Did you -- did you work in a store or did you**
 7 **manage more than one store?**
 8 A. No, I worked in one store. I managed one
 9 store.
 10 **Q. Did you -- excuse me -- I apologize. I'll --**
 11 **I'll stop drinking while I'm asking questions. Did you**
 12 **do that in San Antonio?**
 13 A. I was trained in San Antonio, and I was moved
 14 to Austin when I was made an assistant manager after my
 15 training.
 16 **Q. And you're from San Antonio. Correct?**
 17 A. I went to high school and college here, yes.
 18 **Q. And how -- how long did you work for Cash**
 19 **America?**
 20 A. I don't recall exactly how much time it was.
 21 **Q. Was it for several years or a month, several**
 22 **months or --**
 23 A. It was a couple of years.
 24 **Q. Okay. Now, we know that in 2003 you went to**
 25 **the Law Enforcement Training Academy at San Antonio**

1 College. Is that right?
 2 A. Yes, I started in 2003.
 3 Q. When did you graduate from the Law Enforcement
 4 Training Academy?
 5 A. I believe it was 2004, end of April, first of
 6 May, sometime around there.
 7 MR. PERRY: We can pull down Exhibit 47
 8 now.
 9 Q. (BY MR. PERRY) Now, the -- the Law Enforcement
 10 Training Academy is where you basically go for two
 11 semesters in order to get a -- in order to earn a peace
 12 officer license. Is that right?
 13 A. At the time I believe it was a nine-month
 14 program. And they didn't use semesters. They used,
 15 kind of like quarters. So it was three separate
 16 sections of -- of months of training. They called it
 17 Phase 1, Phase 2, and Phase 3.
 18 Q. And at the end of that you -- you had earned --
 19 based on the classes you had attended, you had earned a
 20 peace officer license. Is that correct?
 21 A. I had earned the right to test for a license,
 22 yes.
 23 Q. And did you test for a license when that was --
 24 when you completed that course?
 25 A. Yes.

1 MR. PERRY: Now, could -- all right. Could
 2 you pull up -- Kayla, could you pull up Exhibit 48?
 3 THE VIDEOGRAPHER: Yes, one moment.
 4 MR. PERRY: Thank you.
 5 Q. (BY MR. PERRY) Officer Carter, Exhibit 48 is
 6 a -- is a ASP baton certificate, training certificate.
 7 Do you see that?
 8 A. I do see that.
 9 Q. That was produced as UIW 030, and it was from
 10 your UIW Police Department file. Was this -- was this
 11 the last -- this -- this is a training certificate that
 12 you earned as part of getting your peace officer
 13 license. Right?
 14 A. Yes, that was part of my training.
 15 Q. And so were you asked to provide this to UIW at
 16 the time of hiring?
 17 A. Yes.
 18 Q. And this was provided to UIW as your proof of
 19 training for the use of an ASP baton?
 20 A. Yes.
 21 MR. PERRY: Please take down Exhibit 48.
 22 Q. (BY MR. PERRY) What was your first job out
 23 of -- out of the Law Enforcement Training Academy?
 24 A. I'm sorry. Can you -- can you clarify that?
 25 Q. What was your first -- what was your first job

1 after you finished -- after the Law Enforcement Training
 2 Academy, you began working for a job in law enforcement.
 3 Is that right?
 4 A. That's correct.
 5 Q. Okay. What was the first job you got, if you
 6 recall?
 7 A. I worked for the City of Marion as a volunteer
 8 police officer.
 9 MR. PERRY: Okay. Could you pull up
 10 Exhibit 50, please, Kayla?
 11 Q. (BY MR. PERRY) We've pulled up for you what's
 12 has been provided as Document 12 from the -- from the
 13 Texas Commission on Law Enforcement. I'll be referring
 14 to that today as TCOLE. Does that ring -- ring with
 15 you, Mr. Carter?
 16 A. Yes.
 17 Q. Okay. This -- this is a license application
 18 from the City of Marion stating that you were appointed
 19 there in -- if you see there, the date of appointment is
 20 September 8th, 2004. Is that what you recall to be
 21 accurate? And feel free to have her scroll down through
 22 it. It's a two-page document.
 23 A. Yes.
 24 Q. Okay. What was your -- what was -- what was
 25 the job you had in -- with the City of Marion in

1 September 2004?
 2 A. It was as a reserve police officer.
 3 Q. Okay. And explain to -- explain to us what a
 4 reserve police officer is.
 5 A. A reserve police officer is a volunteer police
 6 officer that gets scheduled to fill in for the full-time
 7 officers.
 8 Q. Do you get paid when you fill in?
 9 A. No. It's a volunteer position, completely
 10 unpaid.
 11 Q. Now, why does someone in your -- in your shoes
 12 in 2004 take a volunteer police officer job?
 13 A. To gain training and experience and to serve
 14 the public.
 15 Q. Okay. Now, it -- did you ever progress to
 16 having employment, paid employment, with the City of
 17 Marion?
 18 A. No, sir.
 19 MR. PERRY: Could we pull up Exhibit 51?
 20 Q. (BY MR. PERRY) Exhibit 51 is the F-5 from when
 21 you separated with Marion. And it says that you
 22 separated as of March 27, 2005.
 23 MR. PERRY: Can we scroll down?
 24 Q. (BY MR. PERRY) Under Terms -- Terms of
 25 Separation. Do you see -- do you see that, Officer

1 Carter?
 2 A. I see it.
 3 **Q. Is it accurate that you ended your -- you ended**
 4 **your term with the City of Marion on or about**
 5 **March 27th, 2005, and you were in good standing when**
 6 **you -- when you left?**
 7 A. Yes.
 8 **Q. What did you do next?**
 9 MR. PERRY: Could we pull down Exhibit 51?
 10 A. I went to work for the City of Cibolo as a
 11 volunteer police officer.
 12 MR. PERRY: Okay. Could we pull up
 13 Exhibit 52?
 14 **Q. (BY MR. PERRY) Exhibit 52 is Documents -- the**
 15 **Documents 14 and 15 from the TCOLE files. They show**
 16 **that you began working with the Cibolo Police Department**
 17 **on -- on or about April 1st, 2005. Is -- is that**
 18 **accurate as far as you remember?**
 19 A. Yes.
 20 **Q. Okay. And that was a volunteer job also?**
 21 A. Yes, it was.
 22 **Q. I haven't checked my geography, but is --**
 23 **was -- or I haven't checked the map today, but is Cibolo**
 24 **closer to San Antonio than Marion?**
 25 A. Yes.

1 this.
 2 **Q. So you were -- so you were at Marion for a**
 3 **little more than six months and then Cibolo for about**
 4 **eight months. Correct?**
 5 A. Correct.
 6 MR. PERRY: Okay. Let's pull up
 7 Exhibit 54.
 8 **Q. (BY MR. PERRY) Let -- let me ask you, did you**
 9 **get training while you were at the -- at either Cibolo**
 10 **or Marion?**
 11 A. Yes.
 12 **Q. What sort of training did you get?**
 13 A. Training in regards to handling of firearms,
 14 report writing, just on-the-job training for police
 15 work.
 16 **Q. Was there formal training -- formal on-the-job**
 17 **training provided by the police department?**
 18 A. On certain times, yes. As a police officer you
 19 have to do formal training in a two-year cycle. So
 20 you're required to do at least 40 hours every two years.
 21 **Q. Okay.**
 22 A. But it's -- it's on the officer. It's not a
 23 requirement through the department. The officer has to
 24 initiate his training if the department doesn't provide
 25 it.

1 **Q. Is that why you made that move?**
 2 A. I made the move because they potentially had a
 3 full-time position opening, and they wanted to hire
 4 me -- to hire me on as a volunteer in the interim.
 5 **Q. So were you -- while you were with Cibolo, were**
 6 **you ever -- ever given a paid position?**
 7 A. No, I was not.
 8 MR. PERRY: Could we pull down 52 and pull
 9 up 53?
 10 **Q. (BY MR. PERRY) Okay. Now, do you see -- and**
 11 **when I -- are you familiar with these L1 and F-5 forms**
 12 **from your workplace?**
 13 A. I am.
 14 **Q. Okay. Now, on 53 is your F-5 from Cibolo.**
 15 **Correct? And feel free to scroll down.**
 16 A. Yes.
 17 **Q. And so it -- it shows that you separated on**
 18 **December 1st, 2005, and that -- and that you resigned**
 19 **and you were honorably discharged. Is that accurate as**
 20 **far as you remember?**
 21 A. That is accurate.
 22 **Q. Why did you leave Cibolo in December of 2005?**
 23 A. I had an opportunity to move to a larger agency
 24 with more resources as a volunteer officer. And I went
 25 to, I believe, the Bexar County Sheriff's Office after

1 **Q. Yes. Now, I -- but I -- I guess I'm asking,**
 2 **were there -- were there times when you went through**
 3 **training where -- like with weapons training -- you were**
 4 **actually out with other officers doing situational --**
 5 **playing different scenarios and training on how you**
 6 **should handle situations as an officer?**
 7 A. We do an annual firearms training --
 8 **Q. Yes.**
 9 A. -- for qualifications for -- for TCOLE with
 10 other officers, but it's -- with that specific scenario
 11 I'd say, no.
 12 **Q. Okay. Now, Exhibit 54 is your L1 from Bexar**
 13 **County dated December 21, 2005.**
 14 MR. PERRY: Can you scroll down and show
 15 that?
 16 MR. HERRERA: I don't have any -- is it
 17 that okay if I -- I --
 18 **Q. (BY MR. PERRY) Is it -- did I hear that you**
 19 **were -- that you were appointed as a peace officer with**
 20 **Bexar County about December 21st, 2005?**
 21 A. Yes.
 22 **Q. What was your job with Bexar County at that**
 23 **point?**
 24 A. They -- they called the position a support
 25 deputy, and it's an unpaid position. I was assigned to

1 the East Patrol, which would be the east side of Bexar
 2 County.
 3 **Q. Now, did you have -- did you have full-time**
 4 **employment otherwise while you were going through these**
 5 **volunteer jobs?**
 6 A. Yes, sir. I was working as a claims adjuster.
 7 **Q. What -- who were you working for?**
 8 A. I was working for Mercury Insurance at the
 9 time.
 10 **Q. So you were an in-house claims adjuster for**
 11 **an in- -- for an insurance company?**
 12 A. That's correct.
 13 **Q. And was that in the San Antonio area?**
 14 A. Yes, that's correct.
 15 **Q. Did you work on a particular type of claim?**
 16 A. No. It was a call-in call center.
 17 **Q. Okay. Was it -- were you primarily auto,**
 18 **property, or --**
 19 A. Auto, property, and commercial.
 20 **Q. How long did you work for Mercury?**
 21 A. A few years. I -- I don't recall how many
 22 years.
 23 MR. PERRY: Can we pull up Exhibit 55?
 24 **Q. (BY MR. PERRY) Okay. Exhibit 55 is your L --**
 25 **your F-5 from Bexar County. It shows that you separated**

1 **from Bexar County about June 27, 2005 -- 2006. Do you**
 2 **see that?**
 3 A. Yes, I see that.
 4 **Q. So you were -- you were at Bexar County**
 5 **about -- right about six months. Right?**
 6 A. Yes.
 7 **Q. At any point did you get a paid position with**
 8 **Bexar County?**
 9 A. No, I did not.
 10 **Q. How many hours a week or a month did you -- did**
 11 **you have to maintain as a -- as a support deputy?**
 12 A. Each agency has its own requirement. Most, a
 13 minimum of two shifts. So if the shifts are eight,
 14 12 -- eight or 12 hours, that's what you work. With
 15 Bexar County they also required you to work special
 16 events such as parades, festivals, that kind of thing.
 17 So it could vary from month to month.
 18 **Q. Okay. Was -- so it was like -- but when you**
 19 **say, "two shifts," it was two shifts a month?**
 20 A. Yes.
 21 **Q. Okay. All right.**
 22 MR. PERRY: Could we pull up Exhibit --
 23 Exhibit 56?
 24 **Q. (BY MR. PERRY) We'll scroll down to the second**
 25 **block of information where it says, "Date of**

1 **Appointment." Okay. There we go. Exhibit 56 is your**
 2 **L1 appointment for the Atascosa Sheriff's Department.**
 3 **Do you see that?**
 4 A. I do.
 5 **Q. Okay. You've -- is it -- did you begin your**
 6 **position with the Atascosa -- am I saying that right?**
 7 A. Yes.
 8 **Q. Okay. Did you begin your position with the**
 9 **Atascosa Sheriff's Department about June 15, 2006?**
 10 A. Yes.
 11 **Q. What was your position with the Atascosa**
 12 **Sheriff's Department?**
 13 A. I was a full-time paid deputy.
 14 **Q. So that explains why you left Bexar County.**
 15 **Correct?**
 16 A. Correct.
 17 MR. PERRY: Could we take down Exhibit 56?
 18 **Q. (BY MR. PERRY) So Atascosa Sheriff's**
 19 **Department was your first full-time paid position as a**
 20 **peace officer. Right?**
 21 A. Yes, that is correct.
 22 **Q. And that was after -- you had been out of**
 23 **school for about two years at that point?**
 24 A. Yes.
 25 **Q. Did you stop working for Mercury Insurance?**

1 A. I did stop working for Mercury Insurance.
 2 MR. PERRY: Let's -- let's pull up
 3 Exhibit 58, please.
 4 MR. HERRING: What -- what did you say?
 5 Exhibit 58?
 6 MR. PERRY: Exhibit 58, yes.
 7 **Q. (BY MR. PERRY) Okay. Exhibit 58 is the F-5**
 8 **from when you left Atascosa County. Do you see that?**
 9 A. Yes.
 10 **Q. Now, it -- it says that you left employment for**
 11 **the county about September 3rd, 2007. Is that accurate?**
 12 A. Yes.
 13 **Q. And it -- it says under that you were honorably**
 14 **discharged and you resigned in good standing to pursue a**
 15 **non-law-enforcement career. Was -- was that correct?**
 16 A. Yes.
 17 **Q. And you worked there for about 15 months?**
 18 A. Yes.
 19 **Q. What did you -- when you left and --**
 20 MR. PERRY: And can we pull down
 21 Exhibit 58?
 22 **Q. (BY MR. PERRY) When you -- when you left in**
 23 **September 2007, what did you leave to do?**
 24 A. I became a bailiff for the City of San Antonio
 25 for the municipal court.

1 Q. Okay.

2 MR. PERRY: Let's pull up -- I'm sorry.

3 Let's pull up Exhibit 50 -- 59, please.

4 Q. (BY MR. PERRY) I'm showing Exhibit 59 is an L1

5 for the Bexar County Sheriff's Office for an appointment

6 about December 5th, 27 -- 2007. Can you see that?

7 A. Yes.

8 Q. Okay. And, now, you left Atascosa County about

9 three months earlier, three months before this. Right?

10 A. Yes.

11 Q. I've seen elsewhere in your record that this

12 was for a support unit deputy sheriff position?

13 A. Yes.

14 Q. Were you -- were you also employed as a bailiff

15 at that point?

16 A. There -- there might have been some overlap.

17 Q. Okay. Well, there's -- there's about three

18 months difference between the two. Do you -- do you

19 recall that you went back to the Bexar County Sheriff's

20 Office in a volunteer position?

21 A. Yes, I do.

22 MR. PERRY: Now -- great. Can we pull up

23 Exhibit 61?

24 Q. (BY MR. PERRY) All right. Now, Exhibit 61

25 is -- is the F-5 separation report from the Bexar County

1 Sheriff's Office dated June -- I believe that says

2 June 26th, 2008. Do you see that?

3 A. I see that.

4 Q. Okay. Once again, this says that -- this one,

5 too, said that you -- so you were there for about six

6 and a half months. Was this -- was this an unpaid

7 position?

8 A. Unpaid, yes.

9 Q. Did you leave -- did you leave a paid position

10 at Atascosa for -- just for any particular reason?

11 A. I believe at the time I was also licensed as a

12 private investigator. And I did some consulting work

13 for a firm called Hub -- Hub International. And I did

14 investigative work for Workmen's Comp claims, personal

15 injury claims, and I was flown around by that company to

16 do private investigations for them.

17 Q. Okay. That makes -- that makes --

18 A. That's probably the case.

19 Q. Okay. That makes sense because I -- I think I

20 recall seeing somewhere that you left for a job that

21 involved travel. Was that -- would that be the job that

22 referred to?

23 A. I'm sorry. There was a little feedback. That

24 involves what?

25 Q. Travel.

1 A. Yes.

2 Q. Okay. Now, you --

3 MR. PERRY: Could we pull down Exhibit 61?

4 Q. (BY MR. PERRY) How long did you work for

5 that -- for the invest- -- the -- as a consultant or

6 an -- or a private investigator?

7 A. It was probably about six months, six or seven

8 months.

9 MR. PERRY: Let's pull up -- let's pull up

10 Exhibit 62. I'm sorry. I've got about half dozen more

11 of these.

12 Q. (BY MR. PERRY) Okay. Exhibit 62 is your

13 appointment as -- with the San Antone -- City of

14 San Antonio's Marshal Unit. Do you see that? If we

15 scroll down to the second block of information.

16 A. Yes, I see it.

17 Q. Okay. Now, you were -- it -- it appears that

18 you were appointed -- so you were appointed on

19 October 27, 2008, as a reserve officer for the City of

20 San Antonio's Marshal Unit. Is that right?

21 A. Yes.

22 Q. And the -- the Marshal Unit is -- you were --

23 it -- it meant that you were a bailiff for municipal

24 courts. Correct?

25 A. That is correct.

1 Q. Was that a volunteer position?

2 A. The bailiff position was a paid position.

3 Q. Okay.

4 A. The deputy marshal's position was an unpaid

5 position within the same entity. So I assisted the

6 Marshal Unit with warrants on municipal citations, but

7 my paid position was a bailiff in the night court.

8 Q. Is -- is the bailiff position considered a law

9 enforcement job?

10 A. No, it is not.

11 Q. Could -- how long -- how long did you work as a

12 bailiff in -- in the night court?

13 A. I think it was about nine months.

14 Q. And did you have another full-time job while

15 you were doing that?

16 A. No.

17 MR. PERRY: Could we -- so could we drop --

18 pull down Exhibit 62 and pull up Exhibit 63?

19 Q. (BY MR. PERRY) And if you'll scroll down to

20 the date section, the designation of separation. This

21 shows -- Exhibit 63 is the F-5 separation from the

22 marshal division. Do you see that?

23 A. I see that.

24 Q. And it shows that you left after five months,

25 about April 1st, 2009. Correct?

1 A. From the deputy marshal's position, yes.
 2 **Q. Okay. So you -- you continued as a -- as a**
 3 **bailliff even though -- for the municipal courts even**
 4 **though you left as a -- working for the marshal**
 5 **division?**
 6 A. No, I -- I left the bailliff position as well.
 7 MR. PERRY: Okay. Let's -- let's pull up
 8 Exhibit 64.
 9 **Q. (BY MR. PERRY) If we could again scroll down**
 10 **to the appointment section. It -- it appears to me that**
 11 **you left as a bailliff to become a full-time peace**
 12 **officer at the City of Mathis. Is that right?**
 13 A. Yes.
 14 **Q. So as of April 9th, 2009, you were appointed as**
 15 **a peace officer and -- and it was a full-time paid**
 16 **position with the Mathis Police Department. Is that**
 17 **correct?**
 18 A. Yes, that is correct.
 19 **Q. So Mathis was your second full-time paid**
 20 **position as a peace officer. Right?**
 21 A. Yes, that is correct.
 22 **Q. Do you recall how long you stayed at Mathis?**
 23 A. I believe about eight months.
 24 **Q. What did you do -- what did you do for Mathis?**
 25 A. I was a night patrol officer.

1 **retired or resigned through mutual agreement with the**
 2 **governmental entity and you're not eligible to reapply**
 3 **for employment.**
 4 **Do you recall anything about your**
 5 **employment there that -- that caused you to leave with a**
 6 **general discharge rather than an honorable one?**
 7 MR. VALADEZ: To verify that, he can do so.
 8 A. Could I -- could I have that form back up?
 9 MR. PERRY: Please. Please. Yes, please
 10 pull Exhibit 22 back up. I'm sorry.
 11 A. Okay. In 2009 I was being recruited by the
 12 City of George West to start their code enforcement
 13 division. And I believe the mayor preemptively spoke to
 14 my former chief and that may be why they gave me a
 15 general discharge. I don't --
 16 MR. VALADEZ: It's okay. If you know.
 17 **Q. (BY MR. PERRY) Fair enough.**
 18 A. But -- but I can't -- I can't speak for that
 19 chief. So all I know was I was being recruited by
 20 George West to start their code enforcement division at
 21 that time.
 22 **Q. When you were --**
 23 MR. JONES: Brent, when you -- I'm sorry.
 24 When you get a chance, Brent, I -- I need a comfort
 25 break, but go ahead until it's natural flow to break. I

1 **Q. A night patrol officer?**
 2 A. I was assigned to the night division, yes.
 3 **Q. Okay.**
 4 MR. PERRY: All right. Could we pull down
 5 64 and pull up Exhibit 22? 20 -- 22.
 6 MR. VALADEZ: What exhibit is this?
 7 MR. PERRY: This is Exhibit 22.
 8 MR. VALADEZ: Okay.
 9 MR. PERRY: It's -- it's been marked
 10 earlier in another deposition.
 11 **Q. (BY MR. PERRY) Exhibit 22, can you confirm --**
 12 **review this and confirm that it's your F-5 separation**
 13 **from the City of Mathis?**
 14 A. Yes, I can confirm.
 15 MR. PERRY: Okay. Can you pull down this
 16 exhibit, please?
 17 **Q. (BY MR. PERRY) Okay. Is it accurate that**
 18 **you -- that you terminated your employment at the City**
 19 **of Mathis after about eight months employment?**
 20 A. Yes.
 21 **Q. You received a general discharge from the City**
 22 **of Mathis. What was the reason for -- that you received**
 23 **a general discharge rather than an honorable discharge?**
 24 A. That, I couldn't tell you.
 25 **Q. And it's -- the -- the F-5 says that you re- --**

1 didn't mean to --
 2 MR. PERRY: Okay. Can we -- can we get
 3 through, like, five more minutes?
 4 MR. JONES: Sure. Sure. I didn't mean to
 5 interrupt you.
 6 MR. PERRY: No, that's okay. I'll finish
 7 this phase of the depo, and we then can move -- we can
 8 move on to something else.
 9 **Q. (BY MR. PERRY) Okay. It's -- let's see here.**
 10 **You -- were you asked about your -- when you applied to**
 11 **work at University of the Incarnate Word, were you asked**
 12 **about your general discharge?**
 13 A. No.
 14 MR. PERRY: Could we -- could we pull up
 15 Exhibit 65, please?
 16 **Q. (BY MR. PERRY) Now, if we could scroll down to**
 17 **that -- again, scroll down to that second block of**
 18 **information. Okay. Now, Exhibit 65 shows that you**
 19 **were -- it's -- it's the appointment, your L1 for George**
 20 **West. Can you see that?**
 21 A. I can.
 22 **Q. Okay. And you were -- you were appointed as a**
 23 **peace officer for George West on November 20th, 2009,**
 24 **just shortly after you left the City of Mathis. Is that**
 25 **right?**

1 A. That is correct.

2 **Q. You said you were -- so you were recruited to**

3 **be a code enforcement lawyer -- code -- code enforcement**

4 **officer?**

5 A. Yes. They had a grant to start a code

6 enforcement division. And I was hired as a full-time

7 peace officer and code enforcement director. So 20

8 hours I did code enforcement and 20 hours a week I did

9 peace officer enforcement.

10 MR. PERRY: Okay. Could we take down

11 Exhibit 65?

12 **Q. (BY MR. PERRY) Now, I -- we'll -- did you --**

13 **did you have to take a test to do code enforcement?**

14 A. If I was not a peace officer, I would have to

15 get certified as a code enforcement officer, but as a

16 police officer, I did not have to take a test.

17 **Q. Explain to me what code en- -- code enforcement**

18 **is.**

19 A. Code enforcement is just enforcement of the

20 civil ordinances and the city or state for health and

21 safety violations, minor ordinances involving trash,

22 rubbish, junk vehicles, so that sort of nature.

23 **Q. Okay. So you worked half-time in code**

24 **enforcement and half-time in patrol?**

25 A. Yes. The grant was a fifty-fifty grant.

1 **Q. And, again, that was your third full-time paid**

2 **position. Is that right?**

3 A. Yes. That's correct.

4 MR. PERRY: Now, could we pull up Exhibit

5 66?

6 **Q. (BY MR. PERRY) Exhibit 66 is the F-5**

7 **separation from George West. Do you see that? Officer**

8 **Carter?**

9 A. Yeah. I'm trying to scroll.

10 **Q. Okay. That's fine. Right there it says --**

11 A. Yes, I see it.

12 **Q. Okay. It's accurate that you left employment**

13 **with George West after about 18 months in May 2011. Is**

14 **that right?**

15 A. That is correct.

16 **Q. And you left your employment at -- at George**

17 **West to go to work for University of the Incarnate Word.**

18 **Correct?**

19 A. Yes, that is correct.

20 MR. PERRY: All right. Let's -- let's take

21 a break at this point.

22 THE VIDEOGRAPHER: The time is 10:04 a.m.

23 We're off the record.

24 (Recess 10:04 a.m. to 10:23 a.m.)

25 THE VIDEOGRAPHER: The time is 10:23 a.m.

1 We're on the record.

2 **Q. (BY MR. PERRY) Officer Carter, while you were**

3 **employed at George West, City of Mathis or Atascosa**

4 **County Sheriff's Department, did you file any grievances**

5 **against any other officers?**

6 A. I -- can you repeat that? My -- my Internet

7 just disappeared.

8 **Q. Yeah. I think we may have --**

9 A. Yeah, my Zoom just disappeared.

10 THE VIDEOGRAPHER: Yeah. I think we lost

11 him. Let's go off the record.

12 MR. PERRY: Let's go off the record.

13 THE VIDEOGRAPHER: The time is 10:24 a.m.

14 We're off the record.

15 (Recess 10:24 a.m. to 10:25 a.m.)

16 THE VIDEOGRAPHER: The time is 10:25 a.m.

17 We're on the record.

18 **Q. (BY MR. PERRY) Officer Carter, while you were**

19 **employed at the City of George West, the City of Mathis**

20 **or the Atascosa County Sheriff's Department, did you**

21 **file any grievances against other offices in those --**

22 **officers in those departments?**

23 A. No, I don't recall doing that.

24 **Q. Were any grievances filed against you by other**

25 **officers within those departments?**

1 A. No, I don't believe so.

2 MR. PERRY: His -- his video connection is

3 not good.

4 THE VIDEOGRAPHER: Can we have a couple

5 people turn their videos off? It'll make it to where it

6 doesn't bog down the connection. Yeah. That helps

7 because I can see his network is better now.

8 **Q. (BY MR. PERRY) Okay. Were -- did you -- while**

9 **you were working for the City of George West, City of**

10 **Mathis or Atascosa County, were there any citizen**

11 **complaints filed against you?**

12 A. Not that I can recall.

13 **Q. Did you receive any promotions while you were**

14 **working for any of -- either of those three places?**

15 A. No.

16 **Q. Did you receive any demotions while you were**

17 **working for any of those three locations?**

18 A. No.

19 **Q. Since December 2013, have you been interviewed**

20 **by attorneys for University of the Incarnate Word?**

21 MR. VALADEZ: I'm going to object and

22 advise him that I believe -- are you just asking him if

23 he was interviewed?

24 MR. PERRY: Yes, by -- by UIW attorneys.

25 MR. VALADEZ: Not the substance of any

1 interview. Correct?
 2 MR. PERRY: Not -- not yet, no.
 3 MR. VALADEZ: You can answer.
 4 A. Yes.
 5 **Q. (BY MR. PERRY) When did that interview occur**
 6 **or was there more than -- were -- was there more than**
 7 **one interview?**
 8 MR. VALADEZ: Hold on a quick second.
 9 Peter -- I don't know if you can see my camera -- Peter
 10 wants to confer. Can we go off record for a second --
 11 MR. PERRY: That's fine.
 12 MR. VALADEZ: -- with respect to that
 13 question?
 14 MR. PERRY: Yes.
 15 THE VIDEOGRAPHER: The time is 10:27 a.m.
 16 We're off the record.
 17 (Recess 10:27 a.m. to 10:29 a.m.)
 18 THE VIDEOGRAPHER: The time is 10:29 a.m.
 19 We're on the record.
 20 **Q. (BY MR. PERRY) Officer Carter, since December**
 21 **6th, 2013, have you been interviewed more than by**
 22 **attorneys for University of the Incarnate Word?**
 23 MR. VALADEZ: Okay. I'm going to object to
 24 that. And I'll explain the basis of my objection, but
 25 I'm objecting to it because it arguably invokes

1 **Q. Okay. Since the lawsuit was filed, have you**
 2 **had any meetings or interviews with attorneys for**
 3 **University of the Incarnate Word?**
 4 MR. VALADEZ: I'm going to assert the same
 5 objection. I'm -- I'm not instructing you not to
 6 answer, but to the extent that -- because I believe
 7 there was a period of time when the lawsuit was filed
 8 and before my involvement where you were represented by
 9 them and you may have had -- just don't include any
 10 conversations you had at that point in time.
 11 THE WITNESS: Okay.
 12 MR. VALADEZ: If you're able to segment
 13 those out. You can answer his -- whether you have
 14 visited with anybody from UIW.
 15 A. Yes. My answer is yes.
 16 **Q. (BY MR. PERRY) The answer is yes?**
 17 A. The answer is yes.
 18 **Q. When -- when have you met -- after Mr. Valadez**
 19 **was retained to be -- to be your attorney, when have you**
 20 **met with UIW attorney -- attorneys, as best you can**
 21 **recall?**
 22 MR. VALADEZ: Okay. With respect that, I'm
 23 objecting on the basis of a joint defense privilege.
 24 MR. PERRY: Okay. Are you instructing him
 25 not to answer?

1 privileged conversations.
 2 MR. PERRY: Okay. Are you instructing him
 3 not to answer?
 4 MR. VALADEZ: I'm -- I'm instructing him
 5 not to answer insofar as it requires you to divulge the
 6 date or the substance of any conversation that you had
 7 with counsel who are acting on your behalf. And -- and
 8 I tell you, Brent, the reason I'm specifically raising
 9 that. There's a period of time that -- before I was
 10 involved where Officer Carter was represented by
 11 attorneys for UIW. The way -- the way I understand
 12 you're -- you're meaning that, which is anybody who was
 13 representing UIW.
 14 MR. PERRY: Okay.
 15 THE VIDEOGRAPHER: We lost him again. Can
 16 we go off the record? I'm sorry. The time is
 17 10:31 a.m. We're off the record.
 18 (Recess 10:31 a.m. to 10:42 a.m.)
 19 THE VIDEOGRAPHER: The time is 10:42 a.m.
 20 We're on the record.
 21 **Q. (BY MR. PERRY) Officer Carter, you -- we filed**
 22 **this lawsuit in May 2014 and Shelton Valadez -- and**
 23 **Valadez was retained as your counsel after the lawsuit**
 24 **was filed. Do you understand that?**
 25 A. I understand that.

1 MR. VALADEZ: Yes. Well, as to the
 2 question of when, if you can remember, Chris, you can
 3 answer solely the question of when.
 4 A. I don't remember when.
 5 **Q. (BY MR. PERRY) Since this -- since this**
 6 **lawsuit was returned from the Texas Supreme Court about**
 7 **eight months ago -- or, no, less than that -- but**
 8 **last -- last summer, have you met with attorneys from**
 9 **University of the Incarnate Word?**
 10 MR. VALADEZ: To the extent he's asking if
 11 you met with them where your counsel was not present,
 12 you can answer the question.
 13 A. No. My answer is no.
 14 **Q. (BY MR. PERRY) Have you met with UIW -- UIW**
 15 **attorneys since, say, May 2020 with your -- with your**
 16 **counsel present?**
 17 MR. VALADEZ: I'm going to object and
 18 instruct him not to answer.
 19 **Q. (BY MR. PERRY) Are you going to take your**
 20 **counsel's advice not to answer?**
 21 MR. VALADEZ: Do you understand?
 22 A. I understand. I'm -- I'm not going to answer
 23 based on my counsel's objection.
 24 MASTER IN CHANCERY: Counselors, if I may
 25 interrupt very briefly, I just want to make sure that

1 the parameters of my involvement are clear. According
2 to Rule 171, as -- as the Master in Chancery, my -- my
3 role is limited. My understanding is the order that has
4 been presented is -- I'm limited to decisions based on
5 assertions of Fifth Amendment and not attorney-client
6 privilege or -- or joint-counselor privilege. Is -- is
7 that correct?

8 MR. PERRY: We can limit it to that, that's
9 fine.

10 MR. JONES: That's fine.

11 MR. VALADEZ: That's my understanding.

12 MR. PERRY: Yes.

13 MASTER IN CHANCERY: Okay.

14 MR. VALADEZ: Or Master.

15 **Q. (BY MR. PERRY) Were you -- were you given any**
16 **documents to review by attorneys from UIW for this**
17 **deposition?**

18 MR. VALADEZ: No, he can answer.

19 **Q. (BY MR. PERRY) Did you review any documents in**
20 **preparation for this deposition?**

21 A. Yes.

22 **Q. What documents did you review?**

23 A. I don't recall exactly. Some were my L1 and
24 F-5s that you've already shown today.

25 **Q. Okay. Did you review your police department**

1 **F-5?**

2 A. As far as documents?

3 **Q. Yes, sir.**

4 MR. VALADEZ: Just any documents.

5 A. I reviewed some documents. I guess they were
6 just general -- I guess general communications is what
7 they would be called or notes, I guess, they would be
8 called, but they aren't my notes. So I can't speak on
9 them.

10 **Q. (BY MR. PERRY) They weren't your notes?**

11 A. No.

12 **Q. Did you review the notes from Annette Thompson**
13 **with regard to her investigations of grievances that you**
14 **filed?**

15 A. I don't know if they were her notes.

16 **Q. Since Mr. Valadez was retained as your**
17 **attorney, have you given a written statement or a**
18 **recorded statement to attorneys for the University of**
19 **the Incarnate Word?**

20 A. In regards to?

21 **Q. The events of December 6th, 2013, when Cameron**
22 **Redus was shot.**

23 A. I'm going to assert my privilege to not testify
24 afforded under the Fifth Amendment of the United States
25 Constitution and Article 1, Section 10 of the Texas

1 **files from the University of the Incarnate Word?**

2 A. No, not that I can recall.

3 **Q. Did you review your human resources file from**
4 **the University of the Incarnate Word?**

5 A. No.

6 **Q. Did you -- did you review any documents**
7 **relevant to the grievances that you filed while you were**
8 **an employee at UIW?**

9 A. What -- what grievance? What are you talking
10 about?

11 **Q. Well, there were -- there were two grievances**
12 **that you filed; one regarding retaliation in early 2012**
13 **against Oscar Rodriguez and then one in August 2013**
14 **against Edward Cruz also for retaliation.**

15 A. They were discussed, but I didn't see any
16 documents in regards to that.

17 **Q. Did you review any documents relevant to any**
18 **investigation of your actions at UIW such as when you**
19 **were accused of unholstering a weapon in early 2012?**

20 MR. VALADEZ: You're asking if he reviewed
21 any documents?

22 MR. PERRY: Yes.

23 A. No, I didn't review any documents.

24 **Q. (BY MR. PERRY) Did -- did you review anything**
25 **regarding your employment at UIW other than your L1 and**

1 Constitution.

2 **Q. Can you -- can you hold up the card that you're**
3 **reading for the camera?**

4 MR. VALADEZ: Actually, I have an objection
5 to the card. It's -- it's a card I've read. And I'll
6 just tell you, Brent, all it is is it -- it's the Fifth
7 Amendment objection that -- his privilege.

8 MR. PERRY: He read this as part of
9 deposition. I'd like to make it an exhibit to the -- to
10 the deposition.

11 MR. VALADEZ: I'm going to object to that.

12 **Q. (BY MR. PERRY) Mr. Carter --**

13 MR. VALADEZ: I tell you what, Brent. I
14 will -- I'm just going to say something. I'll keep the
15 card so if we can discuss it later, but I'm not -- I'm
16 not going to do anything with the card. I'll keep it.
17 That way we can discuss that and see if we truly have a
18 fight about that or not, but the --

19 MR. GOSTOMSKI: Brent, I think it's covered
20 by the attorney-client privilege if nothing else.

21 THE REPORTER: Who was that?

22 MR. GOSTOMSKI: Peter Gostomski. Sorry,
23 Monica. I got in trouble the first time.

24 Okay, Brent. Hold on.

25 **Q. (BY MR. PERRY) Mr. Carter, you just -- you**

1 read from a card that was provided to you by your
 2 attorneys. Correct?
 3 A. Yes, that's correct.
 4 **Q. Could you read that card again for the record?**
 5 A. Yes. I assert my privilege not to testify
 6 afforded under the Fifth Amendment of the United States
 7 Constitution and Article 1, Section 10 of the Texas
 8 Constitution.
 9 **Q. From -- from here on out -- Thank you. From**
 10 **here on out in this deposition when you want to assert**
 11 **that privilege, can we have an agreement that all you**
 12 **say is something along the lines of I assert my Fifth**
 13 **Amendment privilege?**
 14 A. I can agree to that.
 15 MR. PERRY: Does any -- do any other
 16 counsel object to that agreement?
 17 MR. VALADEZ: Not so long as it's -- it's a
 18 standing objection that -- I mean, it's a standing
 19 agreement that whenever he says that that, you know -- I
 20 just want to make sure that there's no issue that --
 21 under the case file where any sustained objection to a
 22 specific question that it's going to be agreed that that
 23 is not imperfect under the cases. That's all I want to
 24 make sure about, Brent.
 25 MR. PERRY: Correct. Yes. We'll have an

1 earlier. But my understanding is that in -- you
 2 resigned at UIW in December 2014. Is that right?
 3 A. That is correct.
 4 **Q. And almost a year later in November 2015, you**
 5 **took a part-time job with the Orange Grove Police**
 6 **Department. Is that right?**
 7 A. That's correct.
 8 **Q. Was that a paid position?**
 9 A. Yes, a part-time paid position.
 10 **Q. How many hours?**
 11 A. Less than 30.
 12 MR. VALADEZ: That was where?
 13 A. Orange Grove Police Department.
 14 **Q. (BY MR. PERRY) And did you have other**
 15 **employment during that time?**
 16 A. No.
 17 **Q. And you left the Orange Grove Police Department**
 18 **after about six months in May 2016. Correct?**
 19 A. Yes.
 20 **Q. And at that point, you went back to the Mathis**
 21 **Police Department. Right?**
 22 A. Yes, that's correct.
 23 **Q. And that was as a full-time paid patrol**
 24 **officer?**
 25 A. Yes, that's correct.

1 agreement that he's asserting the privilege not -- not
 2 against self-incrimination under both Fifth Amendment to
 3 the United States Constitution and Article 1, Section 10
 4 of the Texas Constitution.
 5 MR. VALADEZ: Okay. That would -- that's
 6 fine.
 7 MASTER IN CHANCERY: In my limited role,
 8 I -- I agree with that as well. This is Roberto Rios,
 9 Ms. Victor.
 10 MR. PERRY: Mr. Jones, are you okay with
 11 that?
 12 MR. JONES: Yeah. I have no objection.
 13 **Q. (BY MR. PERRY) Okay.**
 14 MASTER IN CHANCERY: Mr. Perry, before you
 15 begin again, if -- if there is a objection to his
 16 assertion as to his Fifth Amendment rights, please let
 17 me know. Otherwise, I will assume that you don't want a
 18 ruling from any party.
 19 MR. PERRY: Yes, that's correct on my end.
 20 **Q. (BY MR. PERRY) Is there anything else written**
 21 **on that card other than what you read to me?**
 22 A. No, sir.
 23 **Q. Other -- I want to run through real quick your**
 24 **post UIW employment. And I'm not -- I'm not going to --**
 25 **I'm not going to do the documents like I did early --**

1 **Q. And you worked -- you worked there for about**
 2 **ten or 11 months?**
 3 A. 11 months, yes.
 4 **Q. Why did you leave the Mathis Police Department**
 5 **in March 2017?**
 6 A. There was a change in administration, and I was
 7 terminated.
 8 **Q. In other words, there was a new police chief in**
 9 **town?**
 10 A. Yes, sir.
 11 **Q. Were there any other reasons that you were**
 12 **terminated besides the new police chief being fired --**
 13 **being hired?**
 14 A. You know, I guess just a change in
 15 administration and personality conflicts, I guess.
 16 **Q. Did you -- did you challenge that -- that**
 17 **termination in any way?**
 18 A. Yes, I did.
 19 **Q. How did you challenge it?**
 20 A. I obtained an attorney through TMPA and the
 21 attorney, Eric Perkins, I think is his last name, filed
 22 on my behalf some grievances with the city managers.
 23 **Q. Were any of those grievances upheld?**
 24 A. I believe my unemployment was upheld through
 25 the Workforce Commission.

1 Q. So you -- you were allowed to collect
 2 unemployment compensation?
 3 A. Yes.
 4 Q. Were there any other grievances that you filed
 5 and what were they specifically about?
 6 A. The only other grievance would have been a
 7 secretary who altered my timesheet which caused some
 8 confusion.
 9 Q. Did -- did altered timesheets have something to
 10 do with your termination?
 11 A. It was alleged that I had altered my timesheet.
 12 Q. And you're -- and you stated that some -- that
 13 someone else had altered it, not you?
 14 A. The procedure for turning in timesheets was to
 15 give it to the secretary, and she would submit them to
 16 City Hall. And she altered my timesheet.
 17 Q. About -- did you receive any other -- you
 18 received unemployment compensation. Did you receive any
 19 other favorable finding or financial compensation as a
 20 result of the grievances that you filed against the City
 21 of Mathis?
 22 A. No.
 23 Q. Since you've separated from Mathis in March
 24 2017, have you been employed full-time as a peace
 25 officer?

1 A. Yes.
 2 Q. Where were you employed?
 3 A. City of Poteet.
 4 Q. Now, you began as -- you began with Poteet as a
 5 reserve officer. Is that right?
 6 A. That is correct.
 7 Q. And you were eventually moved to a full-time
 8 position?
 9 A. That's correct.
 10 Q. All right. How long did you work for the City
 11 of Poteet as a full-time peace officer?
 12 A. Three and a half years.
 13 Q. And when did -- when did you separate from
 14 Poteet?
 15 A. November of 2020.
 16 Q. And what were the -- what were the terms of
 17 separation?
 18 A. I retired.
 19 Q. You retired?
 20 A. Yes, sir.
 21 Q. Was that -- was that -- was that by agreement?
 22 A. Yes.
 23 Q. Were there any -- were there any circumstances
 24 that caused you to retire?
 25 A. I needed to take care of my family.

1 Q. Would you have otherwise been terminated if you
 2 hadn't retired?
 3 A. No, sir.
 4 Q. Have you -- have you had any employment since
 5 November of 2020?
 6 A. Yes. I was briefly employed with the City of
 7 San Antonio.
 8 Q. What did you do for the City of San Antonio?
 9 A. I was a cadet for animal control.
 10 Q. And how long did you -- how long did do you
 11 that job?
 12 A. It was less than 30 days.
 13 Q. And why did that job end?
 14 A. I just -- it didn't appeal to me.
 15 Q. And so right -- right now you don't have any
 16 paid employment. Is that right?
 17 A. That's correct. I'm not employed right now.
 18 MR. PERRY: Can we pull up Exhibit 23?
 19 THE VIDEOGRAPHER: Okay. One moment,
 20 please.
 21 A. Exhibit 23.
 22 MR. VALADEZ: Yes.
 23 Q. (BY MR. PERRY) Could you scroll through
 24 Exhibit 23 and when you're ready confirm for me that
 25 this is your employment application to University of the

1 Incarnate Word that you filed on or about March 20 -- or
 2 April 26th, 2010?
 3 MR. JONES: Brent, can I once again ask
 4 that when you introduce one of these you give us the
 5 Bates stamps, please?
 6 MR. PERRY: Sure.
 7 MR. JONES: Thank you.
 8 MR. PERRY: This is UIW 120 to 124.
 9 MR. JONES: Thank you.
 10 A. Okay. I've reviewed it.
 11 Q. (BY MR. PERRY) Is that -- is that your
 12 application that you filed with UIW on or about
 13 April 26, 2010?
 14 A. Yes.
 15 MR. PERRY: Now, could we pull down
 16 Exhibit 23?
 17 Q. (BY MR. PERRY) What caused you to apply to be
 18 a peace officer at UIW?
 19 A. The grant-funded position was going to end in
 20 George West.
 21 Q. You came to work -- you -- you applied in April
 22 of 2010, about a year -- or did you apply -- I'm sorry.
 23 Did you apply in April 2011?
 24 A. It was April 2011 when I applied.
 25 Q. That's -- okay. I -- I -- I first thought that

1 was a zero with a line through it, but it was it was --
 2 it was actually -- okay. So 2011?
 3 A. Yes, sir.
 4 Q. When did the grant position end?
 5 A. In 2011.
 6 Q. So -- so you were -- and you were looking to
 7 move back to San Antonio?
 8 A. Yes.
 9 Q. How did you -- how did you find out about the
 10 job?
 11 A. Just on the job search.
 12 Q. You applied online?
 13 A. Yes, sir.
 14 Q. You -- you listed as professional references
 15 Jason Lee. Do you still have any contact with Jason
 16 Lee?
 17 A. I do not.
 18 Q. You listed an Andrew Aycock. Do you still
 19 have any contact with Andrew Aycock?
 20 A. He's deceased.
 21 THE REPORTER: I'm sorry?
 22 Q. (BY MR. PERRY) Deceased.
 23 A. Yes.
 24 Q. You also listed Gilbert Cardenas. Do you have
 25 any contact with Mr. Cardenas?

1 A. Not currently.
 2 Q. Were you -- were you called in for an interview
 3 for the UIW job?
 4 A. Yes.
 5 Q. What did that interview consist of, as best you
 6 recall?
 7 A. The best I recall, it was an interview board
 8 panel. And I don't recall who was in the board, and I
 9 don't recall the date when I interviewed.
 10 Q. You know that you were -- we know that you were
 11 hired about -- you filled it out on April 21st, and you
 12 were hired in -- in May. Correct?
 13 A. Yes.
 14 Q. Did you -- did you have more than one
 15 interview?
 16 A. No, not that I recall.
 17 Q. Were there any tests or any -- whether academic
 18 or physical, that -- that you were given before you --
 19 before you were hired?
 20 A. No. The only thing was the interview board.
 21 Q. Now, you had not worked at an educational
 22 institution before that. Is that right?
 23 A. That's correct.
 24 Q. Were you given -- so other than these two
 25 interviews, did you -- did you have a meeting with the

1 chief, with Chief Colunga, before you were hired?
 2 A. No.
 3 Q. Were you -- when you were hired, were you given
 4 any training specific to the job working for an
 5 educational institution?
 6 A. I was given on-the-job training for a couple of
 7 weeks.
 8 Q. Did -- did that consist of largely shadowing
 9 another officer who was already employed?
 10 A. Yes, that's correct.
 11 Q. So -- so for your first two weeks, who did you
 12 work with?
 13 A. I worked with Officer Rodriguez and partially
 14 Ed Cruz.
 15 Q. Were they both corporals at that time?
 16 A. Oscar was termed a officer in charge and for
 17 a -- it's a supervisor position, but not a corporal.
 18 And Ed Cruz was a corporal.
 19 MR. PERRY: Pull up the Exhibit 1, Kayla.
 20 THE VIDEOGRAPHER: Yes, one moment.
 21 Q. (BY MR. PERRY) I'm not going to bother with
 22 131 pages of this exhibit, but this is -- Exhibit 1 is a
 23 policy and procedures manual for UIW that they provided
 24 us -- the UIW Police Department -- that they provided us
 25 in this litigation. Were you asked to review this

1 manual before when you were employed?
 2 A. No.
 3 Q. Were -- were you ever required to sign off
 4 having reviewed it or anything like that?
 5 A. I've never seen this manual.
 6 MR. PERRY: Well, please take down
 7 Exhibit 1.
 8 Q. (BY MR. PERRY) My -- my understanding is that
 9 an officer -- as an officer for UIW, you were on your
 10 own for training. Is -- was that -- is that accurate?
 11 A. I'm sorry?
 12 Q. You were on your own for training. You had
 13 to -- you had to get your own continuing education time
 14 in order to maintain your license?
 15 MR. JONES: Object, form.
 16 A. For the most part, yes.
 17 Q. (BY MR. PERRY) There was a brief period in
 18 2011 when there was some in-house training provided at
 19 UIW. Is that right?
 20 A. Yes. They provided classes every once in a
 21 while.
 22 Q. Were you behind that effort? Like, did you
 23 initiate it? Did you initiate that effort?
 24 A. No.
 25 MR. PERRY: Okay. Could we pull up --

1 Q. (BY MR. PERRY) Well, let me ask you this. Do
2 you recall in early 2012 filing a complaint against your
3 officer in charge -- Actually, first, you were first --
4 when you were hired in May -- I'm going to strike that
5 question and start over.

6 When you were hired in May 2011, you were
7 assigned to the C-shift. Is that right?

8 A. Yes.

9 Q. And the C-shift is the overnight shift from
10 10:00 p.m. to 6:00 a.m. Correct?

11 A. That is correct.

12 Q. Your officer in charge when you were hired was
13 Oscar Rodriguez. Is that right?

14 A. Yes.

15 Q. And in January 2012, about seven months after
16 you were hired, you filed a retaliation complaint
17 against him or made a retaliation complaint against him.
18 Is that -- is that right?

19 A. I don't recall the date, but, yes, I did file a
20 complaint.

21 MR. PERRY: Okay. Could you pull up
22 Exhibit 22, Kayla? Hold on. I'm sorry. Exhibit 27. I
23 apologize.

24 Q. (BY MR. PERRY) Okay. The first page is an
25 e-mail from Chief Colunga to Ms. Thompson. Do you see

1 A. I know other people complained, but I don't
2 know what they complained about.

3 Q. Do you know whether anyone else made a formal
4 complaint against him?

5 A. Not that I can recall.

6 Q. Did you ever get a formal finding whether your
7 complaint was substantiated or not?

8 A. I wasn't told anything one way or the other
9 about my complaint.

10 Q. Did the --

11 MR. PERRY: Could we take down Exhibit
12 No. 27?

13 Q. (BY MR. PERRY) Did -- did the UIW Police
14 Department have a formal process for resolving
15 complaints like yours?

16 A. Normally complaints were just made to HR, and
17 they would handle them.

18 Q. Were you moved from the C-shift as a result of
19 this?

20 A. No. I requested to be moved to B-shift.

21 Q. When were you moved to the B-shift?

22 A. I don't recall. It was maybe a few months
23 after this.

24 Q. During your time at UIW, are you aware of any
25 officer other than yourself who filed a grievance or

1 that?

2 A. Yes, I see that.

3 Q. Okay. And then if we could go down to the --
4 to the second page, it says, "Inter-Office." This is
5 the attachment to the e-mail. It says, "On or about
6 December 9, 2011, I received an e-mail from C-shift
7 Officer Carter. In his e-mail Carter cited he believed
8 he was being targeted by his immediate supervisor OIC
9 Oscar Rodriguez and being retaliated against." Do
10 you -- do you recall making that complaint?

11 A. I recall.

12 Q. What was the substance of -- of your complaint
13 against him, if you remember?

14 A. Just in -- in general the -- the complaint was
15 regarding the treatment that Officer Oscar Rodriguez was
16 singling me out and -- and not having me participate in
17 the shift endeavors.

18 Q. How was your complaint resolved?

19 A. Ultimately, Officer Rodriguez was terminated.

20 Q. When was he terminated?

21 A. I don't remember.

22 Q. Was he terminated as a result of your
23 complaint?

24 A. I don't know.

25 Q. Were you aware of other complaints against him?

1 complaint against another officer?

2 A. I know some officers did file grievances, but I
3 don't remember their names or -- or when.

4 Q. You don't -- you don't remember either the
5 names or the substance of any of those grievances?

6 A. That's been so long ago.

7 Q. In April 2012, there was -- there was an
8 investigation within the police department about whether
9 you had engaged in deadly conduct on two separate
10 incidences -- inci -- incidents where you withdrew your
11 service weapon from its holster with no cause, with no
12 imminent threat of life or serious bodily injury. Do
13 you recall --

14 A. Yes. I'm sorry. Go ahead. I interrupted you.
15 Go ahead.

16 Q. Do you recall that investigation in April of
17 2012?

18 MR. VALADEZ: I'm going to object as to
19 form. Go ahead and answer the question.

20 A. No, I don't recall that unholster.

21 Q. (BY MR. PERRY) You were -- you were accused in
22 a -- in a written complaint by Officer Tamez of having
23 unholstered your -- your weapon outside the police kiosk
24 in late 2012 -- or late -- I'm sorry -- late 2011 and
25 pointed it in the general direction of the Bill

1 Miller's -- or actually the Burr streetlight near the
 2 Bill Miller's across the street from UIW. Do you recall
 3 that allegation being investigated?
 4 A. No, nobody told me I was being investigated for
 5 that and that didn't occur.
 6 Q. You were -- you were also accused of having
 7 removed your service weapon inside the police office and
 8 having tapped it the glass and pointing -- and pointed
 9 it towards to Marion Howard Hall in -- sometime in early
 10 2012. Do you recall that allegation against you?
 11 A. No, I've never heard.
 12 MR. PERRY: I'm not -- I'm -- I object as
 13 nonresponsive.
 14 Q. (BY MR. PERRY) I'm not asking you whether --
 15 A. They --
 16 Q. -- it occurred. I'm asking --
 17 A. No, they never -- they never spoke to me --
 18 MR. VALADEZ: Let him finish -- let him
 19 finish question and then you can answer.
 20 Go ahead, Brent. Sorry.
 21 Q. (BY MR. PERRY) I'm sorry. Do you recall that
 22 investigation?
 23 A. I was never told I was under investigation, and
 24 they never spoke to me about it. That's what I meant
 25 when I said it never occurred. They never spoke to me

1 Q. (BY MR. PERRY) I will let you read this
 2 before -- before I ask you questions about it. Please
 3 tell me when you've had time to read this.
 4 A. Okay. I've read this.
 5 Q. Okay. Exhibit 6 is UIW 2721. In this -- in
 6 this document, Jessica Serbantes represents --
 7 reprimands you for conduct unbecoming a UIW peace
 8 officer. Do you see that?
 9 A. I see that.
 10 MR. GOSTOMSKI: Objection, form.
 11 Q. (BY MR. PERRY) Do you --
 12 MR. GOSTOMSKI: Peter Gostomski.
 13 Q. (BY MR. PERRY) Do you --
 14 MR. JONES: Join in the objection.
 15 Q. (BY MR. PERRY) Were you reprimanded by -- by
 16 Corporal Jessica Serbantes for conduct unbecoming to the
 17 mission of the University of Incarnate Word in
 18 January 2013?
 19 A. No. This is the first I've seen this.
 20 MR. JONES: Brent, can we have an agreement
 21 that an objection made by one party for the defense
 22 applies to all so we don't have to all jump in and
 23 object as well?
 24 MR. PERRY: That's fine.
 25 MR. JONES: Thank you.

1 about it.
 2 Q. Sure. Fair enough. Okay. They -- so you were
 3 not -- you were not ever informed of the results or the
 4 conclusion of any -- of any of these -- of this
 5 investigation?
 6 A. I was never even informed I was being
 7 investigated.
 8 Q. While you were employed by University of the
 9 Incarnate Word as a peace officer for a little over
 10 three years, were you ever a witness in any internal
 11 affairs investigation?
 12 A. In -- in what respect?
 13 Q. And -- and I'm distinguishing an internal
 14 affairs investigation as opposed to a human resources --
 15 what they call an investigation?
 16 A. Is there any specific event that you're
 17 referring to?
 18 Q. Well, I'm asking that. I -- I haven't seen any
 19 occasion on which you were, but I'm ask -- asking you --
 20 A. No.
 21 Q. Were you -- other than your grievances, were
 22 you ever -- were you ever a witness in any human
 23 resources investigation into the police department?
 24 A. No, sir.
 25 MR. PERRY: Can we pull up Exhibit 6?

1 Q. (BY MR. PERRY) Do you recall the incident
 2 which is described in Exhibit 6?
 3 A. I don't recall this incident directly, but I do
 4 recall directing traffic at the high school.
 5 Q. Now, as -- in -- in 2013, part of your job as a
 6 UIW police officer was to direct traffic around the
 7 Incarnate Word High School. Correct?
 8 A. Yes, to release the vehicles from the main
 9 campus onto the highway.
 10 Q. Officer Serbantes testified that she had to
 11 reprimand you because of your behavior with -- because
 12 of your behavior towards the drivers of two vehicles --
 13 MR. JONES: Objection as to --
 14 Q. (BY MR. PERRY) -- on Jan -- I'm sorry -- on
 15 January 14, 2013. Do you recall being reprimanded by
 16 Corporal Serbantes and being removed from your work that
 17 day?
 18 A. No, I was not.
 19 Q. You don't recall it or you were not removed
 20 from your work by Corporal Jessica Serbantes on
 21 January 14, 2013?
 22 A. I was not removed that I can recall on that
 23 date or any date from traffic direction.
 24 Q. Jessica Serbantes wrote, "It is unfortunate
 25 that this is not the first time verbally aggressive

1 behavior has been observed by Officer Carter and
 2 therefore a verbal reminder will no longer suffice."
 3 Are there other times than this January 14,
 4 2013, when she -- verbally reprimanded you for an
 5 aggressive behavior towards non-police officers, towards
 6 the public or -- or students in the UIW community?
 7 MR. JONES: Object, form.
 8 MR. VALADEZ: Same objection.
 9 A. As I stated earlier, this is the first time
 10 I've seen this document. And there has been no instance
 11 where I was either removed or reprimanded while
 12 directing traffic at Incarnate Word High School by
 13 Officer Serbantes or any other supervisor.
 14 **Q. (BY MR. PERRY) If Officer -- if Corporal**
 15 **Serbantes said that you were the only officer that she**
 16 **had to reprimand in this fashion, would you -- would you**
 17 **disagree with her?**
 18 MR. JONES: Object, form.
 19 A. I can't speak on what Officer Serbantes would
 20 say or wouldn't say.
 21 **Q. (BY MR. PERRY) I'm not asking that. Do you**
 22 **know if any other officers have been -- who have been**
 23 **either verbally reprimanded for aggressive behavior --**
 24 **during your employment at UIW, do you know of any other**
 25 **peace officers who were verbally or in writing**

1 **Q. But you didn't shoot any of the pigeons?**
 2 A. No.
 3 MR. VALADEZ: Mr. Tamez and who?
 4 A. Tamez and Ramos, or Stephen Ramos.
 5 MR. PERRY: Can we pull up Exhibit 9?
 6 THE VIDEOGRAPHER: Yes. One moment.
 7 Actually, one second. I have 8 and then it goes to 10.
 8 Let me check.
 9 MR. PERRY: Oh, maybe I --
 10 THE VIDEOGRAPHER: Yeah, in the share file
 11 it just goes from 8 to 10.
 12 MR. PERRY: Okay.
 13 MR. JONES: Brent, is this a good time to
 14 take a comfort break?
 15 MR. PERRY: Yes. Yes, we can do that.
 16 That's fine.
 17 MR. JONES: Thank you.
 18 THE VIDEOGRAPHER: The time is 11:27 a.m.
 19 We're off the record.
 20 (Recess from 11:27 a.m. to 11:43 a.m.)
 21 THE VIDEOGRAPHER: The time is 11:43 a.m.
 22 We're on the record.
 23 MR. PERRY: Okay. Kayla, can you pull up
 24 Exhibit 9, which is UIW 3151 -- 1351?
 25 **Q. (BY MR. PERRY) Officer Carter, when you review**

1 reprimanded for verbally aggressively behavior?
 2 MR. JONES: Object, form.
 3 A. No, I'm -- I'm not aware of that.
 4 MR. PERRY: Could you pull down Exhibit 6?
 5 **Q. (BY MR. PERRY) Was there a point where Chief**
 6 **Colunga suggested that you get anger management**
 7 **counseling?**
 8 A. No, sir.
 9 **Q. He didn't refer you to a -- to a Dr. Tucker at**
 10 **UIW?**
 11 A. No, sir.
 12 **Q. Were you ever involved in a pigeon kill by UIW**
 13 **peace officers?**
 14 A. No, sir.
 15 **Q. Did you ever take a -- take an air rifle out**
 16 **and shoot pigeons that were pooping on the UIW police**
 17 **cars?**
 18 A. No, sir, I did not, but I was present when
 19 other officers did.
 20 **Q. Who were the officers that did that?**
 21 A. That was Officer Tamez and Officer Ramos.
 22 **Q. If they said you were involved, that would be**
 23 **incorrect?**
 24 A. I disposed of one of the pigeons they shot. I
 25 put it in a trash can.

1 that -- when you finish reviewing that, let me know.
 2 A. Okay. I've reviewed it.
 3 **Q. Officer Carter, is this the grievance that you**
 4 **filed against Corporal Cruz in August of 2013?**
 5 A. Yes.
 6 **Q. At that -- could we -- at that point --**
 7 **MR. PERRY: Could we pull down Exhibit 9?**
 8 **Q. (BY MR. PERRY) At that point were you asking**
 9 **for a shift change to the A-shift?**
 10 A. I was.
 11 **Q. You were on the B-shift and your corporal was**
 12 **Jessica Serbantes. Correct?**
 13 A. Yes, at that time.
 14 MR. VALADEZ: You were on B?
 15 A. I was on B, and she was my corporal at that
 16 time.
 17 **Q. (BY MR. PERRY) And as I understand it, Perla**
 18 **Guzman was the corporal for the C-shift. Correct?**
 19 A. At that time, yes.
 20 **Q. And were you -- were you frustrated that you**
 21 **couldn't -- that you couldn't obtain a move to the -- to**
 22 **the A-shift?**
 23 A. Not frustrated, just trying to smooth things
 24 over.
 25 **Q. Okay. Well, you filed a grievance against**

1 **Corporal Cruz to try to smooth things over?**

2 A. No. When I -- when I made the request to
3 rescind the transfer, I was trying to smooth things
4 over.

5 **Q. Okay. Do you recall that there was a -- an**
6 **investigation by HR to follow up on your grievance?**

7 A. I know HR looked into it, but I don't know the
8 depth of it.

9 **Q. Were you interviewed by Annette Thompson in**
10 **human resources?**

11 A. Yes.

12 MR. PERRY: Could we pull up Exhibit 10?

13 **Q. (BY MR. PERRY) Although -- although I don't**
14 **have testimony on this, my understanding is that these**
15 **are Annette Thompson's notes from an interview with you**
16 **on August 12, 2013.**

17 MR. JONES: Object, form.

18 **Q. (BY MR. PERRY) I'm not asking you to confirm**
19 **that. I just have them here as background. Were you**
20 **interviewed about your grievance against Corporal Cruz**
21 **by Annette Thompson?**

22 A. Yes.

23 **Q. And did -- did that interview occur within a**
24 **few days of you having filed the grievance with Shannon**
25 **Root?**

1 **Ms. Thompson that Office -- that Corporal Cruz had given**
2 **a false statement that you had drawn a gun and pointed**
3 **it at a window?**

4 A. Yeah, that's correct. I never pointed a gun at
5 a window.

6 **Q. I'm not asking you whether you did it or not.**
7 **I'm asking you whether you told Annette Thompson that**
8 **Corporal Cruz had made such a statement.**

9 A. I -- honestly, I don't recall.

10 **Q. Did you tell her that Cruz doesn't like you?**

11 A. Yes.

12 **Q. Did you tell her that Chief Colunga had either**
13 **told or suggested to you that you see Dr. Tucker because**
14 **of your anger issues?**

15 A. No, I don't recall a Dr. Tucker or any --
16 anything in relates -- relation to that.

17 **Q. Did you ever have a discussion with -- with**
18 **Corporal -- with Chief Colunga where he told you that --**
19 **that you should seek counseling because of any personal**
20 **issues or -- or problems?**

21 A. No, sir.

22 **Q. Did you think you were being retaliated against**
23 **because you were the only Caucasian in the department?**

24 A. That was one of the rumors that was told to me
25 by an officer on A-shift.

1 A. Yes.

2 **Q. Shannon Root was also an employee in human**
3 **resources as was Annette Thompson. Right?**

4 A. I believe Annette was the director of HR and
5 Shannon was an employee.

6 **Q. Did you have any interviews with Shannon Root?**

7 A. Mostly e-mails.

8 **Q. Okay. Well, you didn't have any interviews**
9 **with her about your grievance?**

10 A. Correct.

11 **Q. Did --**

12 MR. JONES: Well, that's it, Larry. You
13 better pay 50 million on this case.

14 MR. PERRY: Is that something, David?

15 MR. JONES: I'm sorry?

16 MR. PERRY: Is that something, David?

17 MR. JONES: No. No. Just me mumbling.

18 MR. PERRY: Okay. I thought I heard you
19 talking to Larry.

20 **Q. (BY MR. PERRY) Did you tell Ms. Thompson that**
21 **Officer Cruz gave a false statement that you had drawn a**
22 **gun and pointed it -- pointed it at the window in the**
23 **police office?**

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

25 **Q. Did you tell -- in that interview, did you tell**

1 **Q. Did you voice that complaint to Ms. Thompson or**
2 **anyone else in HR?**

3 A. I told that to Ms. Thompson.

4 **Q. Did you voice that complaint to anyone in the**
5 **police department?**

6 A. Corporal Serbantes.

7 MR. PERRY: Could we pull up Exhibit 13?

8 **Q. (BY MR. PERRY) Would you review Exhibit 13 and**
9 **tell me when you've had time to review it?**

10 A. I've reviewed it.

11 **Q. Okay. Were you told -- were you told in**
12 **August -- or did you receive this letter in August 2013?**

13 A. I was shown this by Chief Colunga in his
14 office.

15 **Q. Okay. Now, this -- you'll agree this is**
16 **addressed to you. Correct?**

17 A. Yes, that's correct.

18 **Q. And generally that block means that they've**
19 **blacked out your personal address. Do you -- do you**
20 **know whether this was mailed to you at your house?**

21 A. No, sir. I don't remember it being mailed to
22 my house. If I remember correctly, it was an internal
23 document.

24 **Q. Did you learn that your -- and I -- and I -- I**
25 **understand it may have been a text or an e-mail or**

1 something like that. So I'm not suggesting anything
 2 beyond that. Did you learn that the grievance you had
 3 filed against Corporal Cruz had not been sustained?
 4 A. I'm sorry. You had a little feedback on it.
 5 Could you repeat it?
 6 Q. Yes. Did you learn -- did you learn that --
 7 that UIW did not sustain the grievance that you had made
 8 against Corporal Cruz?
 9 A. Yes.
 10 Q. Again, while you were employed by UIW, are you
 11 aware of any other similar grievances that required a
 12 similar investigation filed by one UIW police officer
 13 against another?
 14 A. Other officers filing against the other
 15 officers?
 16 Q. Yes.
 17 A. Yes. I know there were a couple of grievances
 18 filed.
 19 Q. And by whom?
 20 A. Honestly, I can remember my coworkers' names,
 21 but I don't know which officers filed the grievances or
 22 what happened to those grievances. I mean, it's -- it's
 23 been several years.
 24 Q. Okay. My -- my understanding is that one of
 25 the results of this was -- was that a computer was --

1 was put in place solely for the purpose of officers
 2 checking in. Do you recall that?
 3 A. I do.
 4 Q. Part of your complaint was that it was
 5 sometimes difficult to check in on time because of the
 6 line at the computer?
 7 A. At the time there were only two computers in
 8 the squad room or the officers called it the fishbowl
 9 because of the glass around the office. And if officers
 10 were utilizing that computer, you could not clock in on
 11 that computer. It's a time clock on the electronic
 12 software. So this other computer was solely for
 13 clocking in and out. It didn't have any other software
 14 on it.
 15 Q. When you -- and as part of this -- as part of
 16 this grievance, did you withdraw your request to be
 17 transferred to the A-shift?
 18 A. Yes.
 19 Q. When did you -- when did you learn that
 20 Officer -- that Corporal Guzman would be leaving her
 21 employment?
 22 A. I was just informed in a general e-mail with a
 23 couple of departments that she was no longer employed.
 24 Q. Do you know the terms of her separation?
 25 A. I don't.

1 MR. PERRY: Could you pull up Exhibit 14?
 2 Q. (BY MR. PERRY) Could you review Exhibit 14 and
 3 tell me when you've had time to read it?
 4 A. I've read it.
 5 Q. Exhibit 14 is a document prepared by Corporal
 6 Serbantes directed to you. Correct?
 7 A. Yes.
 8 Q. And it relates to a complaint on a San Antonio
 9 Police Department traffic unit with the number given
 10 there, I -- I presume. Is that -- is that right?
 11 A. Yes.
 12 Q. And she -- she said that she -- that she
 13 understood that you had observed a San Antonio Police
 14 Department vehicle traveling at a higher rate of speed
 15 than allowed in a school zone. And that you had
 16 followed it on Hildebrand and then notified the
 17 San Antonio Police Department of the driver's -- of the
 18 police officer's reckless driving. Is that an accurate
 19 statement that you did that?
 20 A. Yes.
 21 Q. And did she reprimand you for going
 22 outside the chain of command?
 23 A. No, it wasn't a reprimand.
 24 Q. How would you describe this?
 25 A. She was, I guess, confused as to the

1 nature of -- we were doing traffic control, which means
 2 we were also enforcing the school zone.
 3 Q. Yes.
 4 A. And she didn't understand that a police vehicle
 5 is not an emergency service vehicle when it doesn't have
 6 its emergency lights activated or its siren. In that
 7 case it's just a regular vehicle. And while it was
 8 speeding through the school zone, I contacted SAPD to
 9 verify that it was on an emergency call. It was not.
 10 So then I just notified the supervisor on shift to speak
 11 with that officer that while traveling through our
 12 school zone if he could maintain the speed limit.
 13 Q. Okay. Now, she gave you this -- she gave you
 14 this written coaching because she didn't understand what
 15 you had done?
 16 A. Correct. Her experience was not as a traffic
 17 officer.
 18 Q. And she -- was there any resolution to -- is
 19 there -- is there a difference between a coaching and a
 20 reprimand?
 21 A. As far as my understanding, this was not a
 22 reprimand. It wasn't supposed to be in my employee
 23 file. Just a communication as to why I took the action
 24 I took.
 25 Q. Did you -- did you give any written -- written

1 explanation of the action that you took back in
 2 August of 2013?
 3 A. I believe I did a report on our reporting
 4 system as a traffic incident.
 5 MR. PERRY: Could you pull up Exhibit 68?
 6 Exhibit 68 is UIW 29 -- 2918 and 2919.
 7 Q. (BY MR. PERRY) Can you review this and tell me
 8 when you've had time to read it? There's -- there's a
 9 little bit on the second page when you're finished with
 10 that.
 11 A. Okay. I've read it.
 12 Q. Do you recall the incident that is described in
 13 Exhibit 68?
 14 A. Yes.
 15 Q. The -- the time is 12:30 a.m. Were you working
 16 the C-shift by October 12 of 2013?
 17 A. Yes.
 18 Q. When did you get moved to the C-shift?
 19 A. In August.
 20 Q. Was that --
 21 A. I believe it was August or first part of
 22 September.
 23 Q. Did that -- did that have anything to do with
 24 resolving your grievance?
 25 A. Yes.

1 Q. So you were no longer working under either
 2 Corporal Serbantes who had coached you twice and -- or
 3 Corporal Cruz whom you made a grievance? You were --
 4 A. Correct.
 5 Q. And had Officer Guzman -- or Corporal Guzman
 6 left by that time?
 7 A. Yes. I was the acting officer in charge at
 8 that time on C-shift.
 9 Q. You were the senior officer at that point?
 10 A. Yes, sir.
 11 Q. And the other officers were Adriana DeHoyos and
 12 Ismael Alatorre?
 13 A. Not at that point. Off- -- Officer Alatorre
 14 was there. I had an Officer Travis.
 15 Q. Okay.
 16 A. And Officer Rendon might have still been on
 17 C-shift and possibly Officer Green.
 18 Q. Now, as -- as I understand this incident, you
 19 had a -- that's described in Exhibit 68 -- you -- there
 20 was a report of a hit and run in the -- is it called
 21 the -- the Agnese-Sosa garage?
 22 A. Yes.
 23 Q. And a pretty good part of a -- of the side of a
 24 truck had been ripped off of it or the front quarter of
 25 the truck. Is that -- is that right?

1 A. That's correct.
 2 Q. And you went around campus looking to see if
 3 there were any other vehicles that looked like they
 4 might have been involved in a hit and -- in a -- in an
 5 accident?
 6 A. Yes.
 7 Q. And I gather that that truck had white paint on
 8 it. So you were looking for other vehicles that had
 9 white paint marks on them?
 10 A. Yes. And I was informed by Officer Anthony
 11 Travis that he had located the vehicle at the other end
 12 of campus parked in an open lot.
 13 Q. Okay. And that -- that was at the lot by
 14 the -- by the football --
 15 A. No.
 16 Q. -- field? No?
 17 A. It was -- it was up -- it was up on the hill
 18 near one of the newer dormitories.
 19 Q. Okay. And so you ran a -- I'm sorry. You --
 20 you ran a check on the -- the license -- the license
 21 plate of that suspect vehicle?
 22 A. Yes. I checked for the registered owner.
 23 Q. And it turned out that the registered owner was
 24 named Wilson?
 25 A. I believe so.

1 Q. And you found that there were two Wilsons on
 2 campus. One that lived in Joeris and one that lived in
 3 Dubuis?
 4 A. The resident assistant informed me that -- I
 5 asked them if they could locate the students with those
 6 last names.
 7 Q. Okay. And you learned that those two -- that
 8 those two students lived in Joeris and Dubuis?
 9 A. Yes. And the Joeris dormitory was the one
 10 closest to the vehicle that was the suspect vehicle.
 11 Q. Okay. So at 12 -- after midnight, you went and
 12 knocked on the door in -- in Joeris of Julia Wilson?
 13 A. Yes. The resident assistant did.
 14 Q. And no one answered?
 15 A. Correct.
 16 Q. Okay. Were you with the resident assistant
 17 when she knocked on the -- the door?
 18 A. Myself and Officer Travis and the resident
 19 assistant.
 20 Q. And -- and then you went -- it's kind of hard
 21 with all this stuff blacked out -- but who is Patino?
 22 A. I'm sorry?
 23 Q. It's referenced -- it says, "After that blank
 24 called Patino and asked her to come to Joeris." Who is
 25 Patino? Do you know?

1 A. I believe that's one -- one of the other
 2 resident supervisors there, assistant supervisors.
 3 **Q. Okay. Did you go back a second time to Julia**
 4 **Wilson's door and knock on it?**
 5 A. No. We were only there one time.
 6 **Q. So you were only -- you were only there the**
 7 **second time?**
 8 A. No. The resident assistant tried to make
 9 contact first. And then when she had no answer, I
 10 arrived with her still being present. And then she
 11 opened the door because she was asleep. She didn't hear
 12 the first knocks.
 13 **Q. And you went in and you -- and then you -- did**
 14 **you go into her dorm room?**
 15 A. No, sir. We stayed at the -- where the door
 16 frame is. She opened the door.
 17 **Q. Did you question her about the hit and run?**
 18 A. I did.
 19 **Q. And did she deny that it was her?**
 20 A. She did. She claimed that her truck was parked
 21 at the football field which is closer to the original
 22 report of the accident scene. She appeared to be
 23 intoxicated at the time.
 24 **Q. Well, what test did you do to determine if she**
 25 **was intoxicated?**

1 A. Honestly, I -- it was common practice when
 2 working nightshift to investigate whatever was reported.
 3 So whatever hour it came in, at that reported time,
 4 that's when I had to investigate.
 5 **Q. (BY MR. PERRY) So you thought you had to --**
 6 **you had to go wake up a student at 12:30 in the morning?**
 7 MR. JONES: Object, form. Hearsay.
 8 **Q. (BY MR. PERRY) Because you thought she might**
 9 **have caused an accident?**
 10 MR. JONES: I'm sorry. I didn't hear that.
 11 I'm sorry. That broke up. Monica, could you read back
 12 that question?
 13 (The question was read.)
 14 MR. JONES: Thank you.
 15 MR. PERRY: Did he answer the question?
 16 THE REPORTER: No, sir.
 17 A. I answered yes.
 18 THE REPORTER: I did not hear you,
 19 Mr. Carter.
 20 A. Okay. My answer is yes.
 21 **Q. (BY MR. PERRY) Do -- okay. So do you think it**
 22 **was necessary to go wake up a student at 12:30 in the**
 23 **morning just because you thought -- you thought she**
 24 **might have caused an accident?**
 25 A. Yes.

1 A. I didn't. I just smelled an alcoholic beverage
 2 on her breath and slurred speech, incoherent.
 3 **Q. Did she appear to be asleep at 12:30 in the**
 4 **morning?**
 5 A. She did.
 6 **Q. Did she tell you that she was a volleyball**
 7 **player who had been away on a -- on a game trip?**
 8 A. I don't recall if she said that.
 9 **Q. Is there anything suspicious about someone**
 10 **being asleep and groggy at 12:30 in the morning?**
 11 A. No, sir.
 12 **Q. Did she -- did she start crying?**
 13 A. I don't recall if she did, but she -- she might
 14 have.
 15 **Q. Were you verbally aggressive with her?**
 16 A. No, sir. I was just questioning her about the
 17 damage on her vehicle.
 18 **Q. Did you -- you -- did you insist that she had**
 19 **caused the accident in -- in the garage?**
 20 A. No, sir. I asked if she had parked in that
 21 garage.
 22 **Q. How many other times while you were employed at**
 23 **UIW did you go knocking on the door of someone sleeping**
 24 **at 12:30 in the morning?**
 25 MR. JONES: Object, form.

1 **Q. And if she said you became quite accusatory,**
 2 **would she be wrong?**
 3 MR. VALADEZ: I'm going to object as to
 4 form.
 5 MR. JONES: Join.
 6 A. What is your question? I -- I didn't hear your
 7 question.
 8 **Q. (BY MR. PERRY) If she said that you became**
 9 **quite accusatory towards to her, would she be wrong?**
 10 A. She would be wrong.
 11 **Q. Because you were always nice to everybody?**
 12 MR. JONES: Object, form.
 13 MR. VALADEZ: You're not going to answer
 14 that question.
 15 **Q. (BY MR. PERRY) Okay. You -- are you -- are**
 16 **you aware of any -- any further investigation that was**
 17 **done regarding the -- the -- the process that led to you**
 18 **knocking on Julia Wilson's door at 12:30 in the morning?**
 19 A. No, sir.
 20 **Q. Now, you applied for the corporal position for**
 21 **shift B. Correct?**
 22 A. Yes.
 23 **Q. And you were the senior officer on shift C?**
 24 A. Yes.
 25 **Q. Did you apply sometime around mid-to-late**

1 **October 2013?**
 2 MR. VALADEZ: Brent, I don't want to
 3 interrupt you, but are you going to keep using this
 4 document on this line of questioning?
 5 MR. PERRY: You can pull down this
 6 document.
 7 MR. VALADEZ: Thank you.
 8 **Q. (BY MR. PERRY) Yeah. Did you -- did you apply**
 9 **to be -- for the corporal position sometime around like**
 10 **October 18th, 2013?**
 11 A. I don't -- I don't recall. When I applied, it
 12 was after Corporal Guzman left.
 13 **Q. Okay.**
 14 MR. PERRY: Could we pull up Exhibit 33.
 15 **Q. (BY MR. PERRY) And go to -- I'm sorry. Go to**
 16 **the third page. Okay. Exhibit 33 is UIW 69 to 73. Do**
 17 **you see that? And it is the -- it is a posting for the**
 18 **corporal position. Do you see that it is -- it is a --**
 19 **on page 3 it says that it's to replace Perla Guzman and**
 20 **that the job is open as of 10/18/2013? A little bit**
 21 **further down a little bit.**
 22 MR. JONES: Brent, can we have Bates stamp
 23 numbers, please?
 24 MR. PERRY: Yes. UIW 69 to 73.
 25 MR. JONES: Thank you.

1 MR. PERRY: Like I said.
 2 **Q. (BY MR. PERRY) Okay. You -- I'm sorry. There**
 3 **on Page 3. Are you scrolling?**
 4 A. Yes, sir.
 5 **Q. Oh, okay.**
 6 A. I am.
 7 **Q. Scroll all you want. I'm -- I'm only going to**
 8 **ask you one question about this. I'm just trying to get**
 9 **the dates right. Do you see that it opened on -- got**
 10 **opened on Oct- -- October 18th and that it closed on**
 11 **October 25th?**
 12 A. That was the official opening and closing, yes.
 13 **Q. Is it -- is it fair to assume that you applied**
 14 **sometime during that period or very close to it?**
 15 A. Yes. I was -- yes, Guzman was no longer
 16 employed prior to the 18th --
 17 **Q. Yes.**
 18 A. -- and I was already acting officer in charge
 19 prior to the 18th when I applied.
 20 **Q. Okay.**
 21 MR. PERRY: And can we pull up -- take this
 22 down and pull up Exhibit 34?
 23 **Q. (BY MR. PERRY) Can you read -- review**
 24 **Exhibit 34 and tell me when you've had time to -- to**
 25 **review it?**

1 A. Yes. I've reviewed it.
 2 **Q. Okay. Is that your application for the**
 3 **corporal position in October 2013?**
 4 A. Yes.
 5 **Q. And this is --**
 6 MR. PERRY: David, this is UIW Documents 44
 7 to 45.
 8 MR. JONES: Thank you.
 9 **Q. (BY MR. PERRY) Do you recall whether there**
 10 **were any other documents that you submitted at that time**
 11 **to apply for the corporal position?**
 12 A. No, I don't believe there were.
 13 **Q. Was there an interview process?**
 14 A. No.
 15 **Q. Do you know whether there were any other**
 16 **applicants?**
 17 A. I believe there were, but I don't know who they
 18 may have been.
 19 **Q. Could you go down to the --**
 20 MR. PERRY: Kayla, could you go to the
 21 fifth page of this document --
 22 **Q. (BY MR. PERRY) Or -- or, Officer Carter, could**
 23 **you go to that? Okay. Go down at the bottom of the --**
 24 **are we on -- let me see here. I'm sorry. Maybe the**
 25 **next page. There we go. That's what I want to ask**

1 **about. This is a -- this is a side question. There's a**
 2 **reference here to -- to training at the University of**
 3 **the Incarnate Word and -- and -- on July 21st, 2011, and**
 4 **on August 12th. Do you see that?**
 5 A. Yes.
 6 **Q. Do you recall that there were, more or less,**
 7 **two days of -- or it looks like two half days of**
 8 **internal department training in 2011?**
 9 A. I see that.
 10 **Q. Do you recall those events at all?**
 11 A. The firearms training was annual
 12 qualifications.
 13 **Q. Okay.**
 14 A. The others, I did not receive that training.
 15 **Q. Okay. You say -- you say you didn't receive**
 16 **the training that's reflected there?**
 17 A. I received the training for -- that's Course
 18 No. 2055.
 19 **Q. Okay.**
 20 A. I did not receive 2047, 3342.
 21 **Q. Okay. And what about the 3022 and 4049 on**
 22 **August 12th?**
 23 A. Those were just -- those were just generic -- I
 24 wouldn't even call them training. It was just a
 25 15-minute conversation with Corporal Gomez.

1 MR. PERRY: Okay. Could we pull up
 2 Exhibit 35?
 3 **Q. (BY MR. PERRY) Have -- okay. And as you**
 4 **review Exhibit 35, it's two pages, and let me know when**
 5 **you finish that.**
 6 MR. PERRY: And it's -- David, it's UIW 91
 7 to 92.
 8 MR. JONES: Thank you.
 9 **Q. (BY MR. PERRY) Okay.**
 10 A. I've reviewed it.
 11 **Q. And you were appointed as corporal of the**
 12 **C-shift on November 1st, 2013. Is that right?**
 13 A. Yes.
 14 **Q. Did you receive a pay raise because of that?**
 15 A. Yes.
 16 **Q. And that was a full-time position?**
 17 A. Yes.
 18 **Q. And that remains to today the only promotion**
 19 **you've ever received as a peace officer within a police**
 20 **department. Is that right?**
 21 A. No.
 22 **Q. What's the other one?**
 23 A. I was made a sergeant with the Mathis Police
 24 Department when I worked the second time.
 25 **Q. The second time.**

1 A. With San Patricio County.
 2 **Q. Okay. To that -- to that -- this point in your**
 3 **career, that was the first time you had received a**
 4 **promotion as a peace officer when employed by a police**
 5 **department. Is that right?**
 6 A. Yes.
 7 **Q. Could we -- were -- were there any other**
 8 **officers that applied that were senior to you, as far as**
 9 **you know?**
 10 A. I'm sorry. Could you repeat that? There was
 11 an echo.
 12 **Q. Were there any other officers that -- in the**
 13 **UIW Police Department that were senior to you that --**
 14 **that wanted that position, as far as you know?**
 15 A. I don't -- I don't know.
 16 **Q. Now, on --**
 17 MR. PERRY: Okay. Pull up Exhibit 69.
 18 **Q. (BY MR. PERRY) Okay. Could you review**
 19 **Exhibit 69?**
 20 A. I reviewed it.
 21 **Q. Yes, it is --**
 22 MR. PERRY: Could we take it down.
 23 **Q. (BY MR. PERRY) Is it -- is Exhibit 69 your**
 24 **TCOLE required weapon certification for 2013?**
 25 A. Yes.

1 **Q. And that was given to you on November 2nd,**
 2 **2013?**
 3 A. Yes.
 4 **Q. And that -- that annual test involves firing**
 5 **your pistol at a target from certain ranges. Correct?**
 6 A. Yes.
 7 **Q. Okay. And you were supervised by Corporal**
 8 **Gomez in that process?**
 9 A. Yes.
 10 **Q. You had to file -- fire from looks like three**
 11 **yards, seven yards, 15 yards, and 25 yards. Is that**
 12 **right?**
 13 A. That's the normal course of fire, yes.
 14 MR. GOSTOMSKI: If you need to see the
 15 document again to answer his question, just ask him.
 16 **Q. (BY MR. PERRY) Yeah, certainly. Certainly.**
 17 **If you need to see a document, just tell me, and I'm**
 18 **glad to -- glad to pull it back up.**
 19 MR. PERRY: Okay. Could you pull up
 20 Exhibit 70?
 21 **Q. (BY MR. PERRY) Just while we're doing that,**
 22 **the -- the process of getting certified for your weapon**
 23 **is -- is simply a -- the -- the process of hitting a --**
 24 **hitting a target a certain percentage of the time. Is**
 25 **that right?**

1 A. Yes, sir.
 2 **Q. It doesn't involve anything beyond that?**
 3 A. Correct.
 4 MR. VALADEZ: Is this Exhibit 70 or 7?
 5 MR. PERRY: No, those are -- okay. This is
 6 Exhibit 70. And this is UIW 22.
 7 **Q. (BY MR. PERRY) Okay. UIW 22 is a**
 8 **certification for field -- standardized field sobriety**
 9 **recertification. Do you see that?**
 10 A. Yes.
 11 **Q. Is it dated November 4th, 2013?**
 12 A. Yes.
 13 **Q. Did you attend a course for standardized field**
 14 **sobriety recertification on or about November 4th, 2013?**
 15 A. Yes.
 16 **Q. Was this a -- was this a video course or an**
 17 **in-person course?**
 18 A. In person.
 19 **Q. And how and where did it occur?**
 20 A. I believe it was the -- course was presented at
 21 the Alamo Council of Governments in San Antonio off of
 22 Tesoro Drive.
 23 **Q. And did it involve lectures? Did it involve --**
 24 **were you involved in scenario-based training at this --**
 25 **at this recertification?**

1 A. Yes.

2 **Q. How long did it -- how long did the course**

3 **take?**

4 A. It was an eight-hour course.

5 **Q. It was all in one day?**

6 A. Yes, sir.

7 **Q. And explain the scenario-based training that**

8 **you were involved in.**

9 A. It involved some video presentation as far as

10 traffic stops --

11 **Q. Yes.**

12 A. -- with instructor commentary. Then it also

13 involved team training where one team would present as

14 the traffic violator and one team as the officer and

15 then vice versa.

16 **Q. How much time was spent in the team-based**

17 **training?**

18 A. Four hours was based on instruction and four

19 hours based on the role play. So morning was

20 instruction, afternoon was scenarios.

21 **Q. Did you practice field sobriety testing?**

22 A. Yes.

23 **Q. Was there any real-life situation here like**

24 **where people -- the people who were involved used**

25 **alcohol?**

1 **Q. Was there any -- I noticed that you copy**

2 **your -- your lawyer and the university general counsel**

3 **on this. Were -- were there any negotiations that led**

4 **to your resignation?**

5 MR. GOSTOMSKI: I'm going to object and

6 assert the attorney-client privilege on that.

7 MR. PERRY: Okay.

8 MR. GOSTOMSKI: Instruct the witness not to

9 answer.

10 THE REPORTER: Was that Mr. Peter?

11 MS. GOSTOMSKI: Yes, ma'am. I was about to

12 say my name. You beat me to it.

13 **Q. (BY MR. PERRY) Did you receive any**

14 **consideration in return for resigning as an officer in**

15 **December of 2010?**

16 THE WITNESS: Should I answer that?

17 MR. GOSTOMSKI: You can answer. You can

18 answer that question, just you're not allowed to -- I

19 don't want you to discuss any nego- -- what negotiations

20 that you might have had any or anything that was talked

21 about between you and your attorney.

22 A. Yes.

23 **Q. (BY MR. PERRY) What consideration did you**

24 **receive?**

25 A. I received a severance package.

1 A. No. There was no drunk test subjects.

2 **Q. Did -- did they teach you different tests that**

3 **you could use for field sobriety?**

4 A. Could you explain a little further?

5 **Q. Well, there's --**

6 A. What type of test?

7 **Q. Stand on one foot, walk out and back. The**

8 **gaze -- the -- I'm forgetting the test that -- testing**

9 **the gaze?**

10 A. Yes. They -- they did instruct and practice

11 the one-legged stand, the walk and turn, and the

12 horizontal gaze, nystagmus.

13 **Q. Any others that you recall?**

14 A. No.

15 MR. PERRY: Could we pull up Exhibit 17?

16 **Q. (BY MR. PERRY) Could you review Exhibit 17 and**

17 **tell me when you've had time to read it?**

18 A. I've reviewed it.

19 **Q. Did you write Exhibit 17?**

20 A. I've reviewed it.

21 **Q. Yes. Did you write this exhibit?**

22 A. Yes.

23 **Q. And you -- this is your resignation letter as**

24 **an employee of UIW. Is that right?**

25 A. Yes.

1 **Q. And what was that severance package?**

2 A. Honestly, I don't recall the amount.

3 **Q. Was it -- was it several months pay?**

4 A. No, sir.

5 **Q. Did it involve money?**

6 A. It involved, I believe, my vacation and sick

7 time.

8 **Q. Did it involve an agreement to give you an --**

9 **an honorable discharge?**

10 A. No.

11 **Q. Did it -- as -- as you recall, did it involve**

12 **anything other than your vacation and sick pay?**

13 A. My retirement that I had to roll over, but

14 that's about it.

15 **Q. Okay. Was -- was it -- was -- was there a**

16 **continuation of insurance, anything like that?**

17 A. No, sir. I mean, it was available under --

18 under COBRA, but I had to pay for that.

19 **Q. Sure. You resigned effective December 10,**

20 **2014?**

21 A. Yes, sir.

22 **Q. Okay. To go back just briefly, were there any**

23 **other UIW police officers who went to that field**

24 **sobriety recertification course with you?**

25 A. No, sir. I was the only one from Incarnate

1 Word.

2 **Q. And you paid for that out of your pocket?**

3 A. Yes, sir.

4 MR. PERRY: Could we pull up Exhibit 42?

5 **Q. (BY MR. PERRY) Exhibit 42 is the F-5**

6 **separation from UIW. Could you review it and then tell**

7 **me when you have had time to review it?**

8 A. I've reviewed it.

9 **Q. Okay. It -- it's accurate that you separated**

10 **your employment as of December 10, 2014, from UIW.**

11 **Correct?**

12 A. Correct.

13 **Q. You were employed at UIW for about three years**

14 **and seven months. Is that right?**

15 A. Yes, sir.

16 **Q. And you received an honorable discharge when**

17 **you left?**

18 A. Yes, sir.

19 MR. PERRY: Could you pull up Exhibit 71?

20 **Q. (BY MR. PERRY) Could you review Exhibit 71 and**

21 **tell me when you've had time to review it?**

22 A. I assert my Fifth Amendment privilege.

23 **Q. Let me -- I appreciate that. Let me ask you a**

24 **question. Is Exhibit 71 a grievance that you filed with**

25 **the EE -- EEOC against University of the Incarnate Word**

1 **on or about May 19, 2015?**

2 A. Again, I assert my Fifth Amendment privilege.

3 **Q. And you asserted that discriminating conduct**

4 **took place between March 2013 and December 10, 2014.**

5 **What was the discriminating conduct?**

6 A. I assert my Fifth Amendment privilege.

7 **Q. What was the result of this -- of this**

8 **grievance or of this complaint that you filed against**

9 **UIW?**

10 A. I assert my Fifth Amendment privilege.

11 MR. PERRY: Okay. As -- as a sidebar -- or

12 Counsel, I'm about to go into what I think will be about

13 a 30-minute series of questions on the events of

14 December 6th. Do we want to take a break?

15 MR. JONES: I would be most grateful.

16 MR. PERRY: Okay. Let's do that and then

17 we'll come on and we'll -- we'll go through that.

18 MR. JONES: Okay.

19 THE VIDEOGRAPHER: It's 12:34 p.m. We're

20 off the record.

21 (Recess 12:34 p.m. to 12:51 p.m.)

22 THE VIDEOGRAPHER: The time is 12:51 p.m.

23 We're on the record.

24 **Q. (BY MR. PERRY) Officer Carter, back to the --**

25 **back to the deposition. On December 6 -- I'm sorry --**

1 **on December 5th, 2013, you came to work about 10:00 p.m.**

2 **for the C-shift at -- at U -- at UIW. Is that right?**

3 A. Yes.

4 **Q. Officers on that duty were you, DeHoyos, and**

5 **Alatorre. Is that right?**

6 A. At one point, yes.

7 **Q. And you gave Alatorre permission to leave**

8 **early?**

9 A. I assert my Fifth Amendment privilege.

10 **Q. Say that again. Oh. Okay. I -- I understand.**

11 **I apologize. Sometime after 1:00 a.m. on December 6th,**

12 **2013, you left the UIW campus to get lunch at**

13 **Whataburger on Broadway near the campus. Is that right?**

14 A. Yes.

15 **Q. When you left campus, you were driving a new**

16 **UIW Police Department truck that was equipped with a**

17 **windshield camera. Correct?**

18 A. It was disabled. The camera was disabled prior

19 to my shift on the windshield.

20 **Q. So the -- the windshield camera was not in**

21 **place when you left the campus. Is that right?**

22 A. Can you repeat it? You -- you faded out.

23 **Q. The windshield -- and I'll -- okay. I'll try**

24 **to get close. The windshield camera was not in place**

25 **and working when you got in the vehicle?**

1 A. That's correct. Another corporal had disabled

2 and removed it.

3 **Q. Who was the corporal that had disabled and**

4 **removed it?**

5 A. I believe his name is Corporal Sanchez.

6 **Q. After getting your lunch at Whataburger, you**

7 **were driving northbound on Broadway near campus. Is**

8 **that right?**

9 A. Yes.

10 **Q. And a brown Ford Ranger pickup passed you on**

11 **your right?**

12 MR. VALADEZ: Objection --

13 A. I assert my Fifth Amendment privilege.

14 **Q. (BY MR. PERRY) The driver of the brown Ford**

15 **Ranger pickup slowed his speed to match yours and drove**

16 **north on Broadway at a speed of less than 30 miles per**

17 **hour. Is that right?**

18 A. I assert my Fifth Amendment privilege.

19 **Q. You did not activate your emergency lights or**

20 **take any steps to stop the brown Ford Ranger pickup on**

21 **Broadway, did you?**

22 A. I assert my Fifth Amendment privilege.

23 **Q. You did not give officer DeHoyos the license**

24 **plate of the brown Ford Ranger pickup when you contacted**

25 **her by -- by radio so that she could run a check on the**

1 vehicle or its driver, did you?
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. The driver of the Ford Ranger pickup safely**
 4 **turned right on Acadia, left in the Tree -- into the**
 5 **Treehouse Apartments parking lot and properly parked in**
 6 **a covered parking space, didn't he?**
 7 MR. JONES: Object.
 8 **Q. (BY MR. PERRY) Didn't he?**
 9 MR. JONES: I'm sorry. Object, form.
 10 **Q. (BY MR. PERRY) I'm sorry. Are you**
 11 **asserting --**
 12 A. I assert my Fifth Amendment privilege.
 13 **Q. You were -- were you aware that the driver of**
 14 **the brown Ford Ranger pickup was a resident of the**
 15 **Treehouse Apartments who had made it home safely?**
 16 MR. JONES: Object, form.
 17 THE REPORTER: I didn't hear you.
 18 MR. VALADEZ: Give a second or two.
 19 David's got objections. I'm sorry guys. Go ahead.
 20 **Q. (BY MR. PERRY) Okay. I'm going to ask the**
 21 **question again. Were you aware that the driver of the**
 22 **brown Ford Ranger pickup was a resident of the Treehouse**
 23 **Apartments who had made it home?**
 24 A. I assert my Fifth Amendment privilege.
 25 **Q. Now, the first thing you said to the driver was**

1 **you did not remove his wallet from his back pocket to**
 2 **check for identification, did you?**
 3 A. I assert my Fifth Amendment privilege.
 4 **Q. When you were frisking him, you learned that he**
 5 **was unarmed, didn't you?**
 6 A. I assert my Fifth Amendment privilege.
 7 **Q. You learned that he had no weapon or anything**
 8 **other than his wallet on his person, didn't you?**
 9 A. I assert my Fifth Amendment privilege.
 10 **Q. Is it correct that you failed to perform or**
 11 **even asked to perform any field sobriety tests to**
 12 **determine whether Cameron Redus was intoxicated?**
 13 A. I assert my Fifth Amendment privilege.
 14 **Q. And you didn't do any -- is it -- is it fair to**
 15 **say that you made no efforts to determine the extent of**
 16 **his intoxication before pulling your baton and**
 17 **handcuffs?**
 18 A. I assert my Fifth Amendment privilege.
 19 **Q. Now, at this point you were in radio contact**
 20 **with Officer DeHoyos at UIW but you could not identify**
 21 **your location properly, could you?**
 22 A. I assert my Fifth Amendment privilege.
 23 **Q. You gave her the name of a street, Preston,**
 24 **that does not exist in Alamo Heights or anywhere near**
 25 **your location that night, didn't you?**

1 **"Stay right there." Is that correct?**
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. And the driver complied with your direction to**
 4 **stay right there, didn't he?**
 5 A. I assert my Fifth Amendment privilege.
 6 **Q. You didn't ask the driver for his driver's**
 7 **license then or at any other time during your encounter**
 8 **with the driver, did you?**
 9 A. I assert my Fifth Amendment privilege.
 10 **Q. The first five things the driver said to you,**
 11 **who we now know is Cameron Redus, were, "All right.**
 12 **That's fine. Hey, hey, hey. That's fine. That's fine.**
 13 **That's fine, and no, sir. Is that correct?**
 14 MR. JONES: Object, form.
 15 A. I assert my Fifth Amendment privilege.
 16 **Q. (BY MR. PERRY) When you first began speaking**
 17 **with Cameron Redus he responded cooperatively, didn't**
 18 **he?**
 19 MR. JONES: Object, form.
 20 A. I assert my Fifth Amendment privilege.
 21 **Q. (BY MR. PERRY) You asked him, "Is there**
 22 **anything in your pockets I need to know about?" And he**
 23 **responded, "No, sir," didn't he?**
 24 A. I assert my Fifth Amendment privilege.
 25 **Q. When you were frisking him after that dialogue,**

1 A. I assert my Fifth Amendment privilege.
 2 **Q. To this point Cameron Redus presented no**
 3 **physical threat to you or to anyone in the vicinity and**
 4 **no risk of flight, did he?**
 5 MR. JONES: Object, form.
 6 A. I assert my Fifth Amendment privilege.
 7 **Q. (BY MR. PERRY) To this point Cameron Redus had**
 8 **offered you no resistance, had he?**
 9 MR. JONES: Object, form.
 10 A. I assert my Fifth Amendment privilege.
 11 **Q. (BY MR. PERRY) At the point you pulled your**
 12 **baton and your handcuffs, you had not given Cameron**
 13 **Redus your identity, had you?**
 14 MR. JONES: Object, form.
 15 A. I assert my Fifth Amendment privilege.
 16 **Q. (BY MR. PERRY) In fact, at no point before**
 17 **you -- you told him he was under arrest, did you either**
 18 **give him your identity or seek to determine his**
 19 **identity, did you?**
 20 A. I assert my Fifth Amendment privilege.
 21 **Q. It was almost two minutes into your encounter**
 22 **with Cameron Redus before you told him he was under**
 23 **arrest. Isn't that right?**
 24 A. I assert my Fifth Amendment privilege.
 25 **Q. It was even longer before you told him he was**

1 under suspicion for a traffic violation, wasn't it?
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. You never told him he was under suspicion of --**
 4 **of any other criminal act, did you?**
 5 A. I assert my Fifth Amendment privilege.
 6 **Q. You -- before you put a bear hug on Cameron**
 7 **Redus, you dropped the baton and your handcuffs on the**
 8 **sidewalk between his truck and the apartment building.**
 9 **Is that right?**
 10 MR. JONES: Object, form.
 11 A. I assert my Fifth Amendment privilege.
 12 **Q. (BY MR. PERRY) Given that to the point you**
 13 **embraced him in a bear hug, Cameron Redus had offered no**
 14 **physical resistance and been verbally cooperative with**
 15 **you. Using a bear hug -- bear hug was greater force**
 16 **than was necessary to arrest Cameron Redus, wasn't it?**
 17 MR. JONES: Object, form.
 18 A. I assert my Fifth Amendment privilege.
 19 **Q. (BY MR. PERRY) A bear hug is not an approved**
 20 **apprehension technique for police officers, is it?**
 21 MR. JONES: Object, form.
 22 A. I assert my Fifth Amendment privilege.
 23 **Q. (BY MR. PERRY) After you put him in a bear**
 24 **hug, Cameron Redus told you that you were freaking him**
 25 **out, didn't he?**

1 A. I assert my Fifth Amendment privilege.
 2 **Q. Did Cameron Redus tell you that he felt like he**
 3 **was getting raped?**
 4 A. I assert my Fifth Amendment privilege.
 5 **Q. Did Cameron Redus tell you that you were**
 6 **scaring him?**
 7 A. I assert my Fifth Amendment privilege.
 8 **Q. Did he tell you that you were scaring the shit**
 9 **out of him right then?**
 10 A. I assert my Fifth Amendment privilege.
 11 **Q. All of these statements occurred during the**
 12 **first two minutes of your encounter with Cameron Redus.**
 13 **Is that -- isn't that right?**
 14 A. I assert --
 15 MR. JONES: Object, form. Sorry, Corporal.
 16 THE REPORTER: Can you answer?
 17 **Q. (BY MR. PERRY) Can you answer?**
 18 A. I assert my Fifth Amendment privilege.
 19 **Q. Let's be clear. When you say you're asserting**
 20 **your Fifth Amendment privilege, you are refusing to**
 21 **answer the question. Is that right?**
 22 A. Yes.
 23 **Q. And that's what you have intended both before**
 24 **this question and as we go forward, whenever you say,**
 25 **"I'm asserting my Fifth Amendment privilege," that**

1 means that you're refusing to answer the question
 2 pursuant to your constitutional privilege against
 3 self-incrimination. Is that right?
 4 MR. JONES: Object, form.
 5 A. That's correct.
 6 MR. VALADEZ: Also, Brent, we had -- we had
 7 an agreement prior and, yes -- as his counsel, yes, and
 8 of course that means he won't be answering the question.
 9 MR. PERRY: Got it. Okay.
 10 **Q. (BY MR. PERRY) You were -- you were about two**
 11 **minutes into the encounter before you told Cameron Redus**
 12 **he was under arrest. Isn't that right?**
 13 A. I assert Fifth Amendment privilege.
 14 **Q. (BY MR. PERRY) When you told him that, he**
 15 **responded with something along the lines of, "Look,**
 16 **dude," and "That's fine," didn't he?**
 17 A. I assert my Fifth Amendment privilege.
 18 **Q. And he told you again that he was scared about**
 19 **what you were doing to him?**
 20 A. I assert my Fifth Amendment privilege.
 21 **Q. And when he said he was scared it was because**
 22 **you had him in bear hug with -- with your arms around**
 23 **him.**
 24 MR. JONES: Object, form.
 25 A. I assert my Fifth Amendment privilege.

1 **Q. (BY MR. PERRY) And your baton and your hand --**
 2 **and your handcuffs were on the ground beside you,**
 3 **weren't they?**
 4 MR. JONES: Object, form.
 5 A. I assert my Fifth Amendment privilege.
 6 **Q. (BY MR. PERRY) Having been put in a bear hug,**
 7 **and having told you he was scared, Cameron Redus could**
 8 **have reasonably believed that his -- that his physical**
 9 **resistance to you was necessary to protect himself from**
 10 **the use of force, couldn't he?**
 11 MR. JONES: Object, form.
 12 MR. VALADEZ: Same objection.
 13 A. I assert my Fifth Amendment privilege.
 14 **Q. (BY MR. PERRY) At this point when you told him**
 15 **he was under arrest, you had no reasonable belief that**
 16 **Cameron Redus presented a serious bodily in -- risk of**
 17 **serious bodily injury to you or to anyone else, did you?**
 18 MR. JONES: Object -- object, form.
 19 MR. VALADEZ: Same objection.
 20 A. I assert my Fifth Amendment privilege.
 21 **Q. (BY MR. PERRY) And you understood that -- that**
 22 **in police terms, serious bodily injury means an injury**
 23 **that creates a substantial risk of death, causes serious**
 24 **permanent disfigurement or the loss -- results in a**
 25 **long-term loss or impairment of a bodily member or**

1 organ. Correct?

2 A. I assert my Fifth Amendment privilege.

3 **Q. And you had -- and you had no -- you had no**

4 **reasonable belief that Cameron Redus presented a risk of**

5 **serious bodily injury to you because you knew he was**

6 **unarmed. Isn't that right?**

7 MR. JONES: Object. I'm sorry. Object,

8 form.

9 MR. VALADEZ: Same objection.

10 THE REPORTER: Who is saying same

11 objection?

12 MR. VALADEZ: Mr. Valadez.

13 THE REPORTER: Can you answer?

14 A. I assert my Fifth Amendment privilege.

15 **Q. (BY MR. PERRY) You understood that force**

16 **should only be used to the least amount necessary to**

17 **effect an arrest, didn't you?**

18 A. I assert my Fifth Amendment privilege.

19 **Q. You made no effort to ask Cameron Redus to**

20 **remain in place while you determined your location, did**

21 **you?**

22 MR. JONES: Object, form.

23 A. I assert my Fifth Amendment privilege.

24 **Q. (BY MR. PERRY) You made no effort to ask**

25 **Cameron Redus to remain where he was there on the**

1 **Q. (BY MR. PERRY) You knew that it was -- that it**

2 **was -- that it would be standard procedure in your**

3 **situation where you were a sole officer operating off**

4 **campus to call the local police department for backup,**

5 **didn't you?**

6 A. I assert my Fifth Amendment privilege.

7 **Q. Cameron Redus at no point presented any**

8 **danger -- immediate danger of death or serious bodily**

9 **injury to you or anyone else, did he?**

10 MR. JONES: Object, form.

11 A. I assert my Fifth Amendment privilege.

12 **Q. (BY MR. PERRY) You were aware at all times**

13 **that Cameron Redus was unarmed, weren't you?**

14 MR. JONES: Object, form.

15 A. I assert my Fifth Amendment privilege.

16 **Q. (BY MR. PERRY) When at any point was Cameron**

17 **Redus armed?**

18 MR. JONES: Object, form.

19 A. I assert my Fifth Amendment privilege.

20 **Q. (BY MR. PERRY) About three minutes into the**

21 **encounter with Cameron Redus you were aware of all these**

22 **facts and acted with conscious and reckless disregard of**

23 **these facts by putting Cameron Redus in a bear hug.**

24 **Isn't that right?**

25 MR. JONES: Object, form.

1 **sidewalk while you asked Officer DeHoyos to send you**

2 **back up from the Alamo Heights Police Department.**

3 **Right?**

4 MR. JONES: Object, form.

5 MR. VALADEZ: Same.

6 A. I assert my Fifth Amendment privilege.

7 **Q. (BY MR. PERRY) The only place at this point --**

8 **the only place that Cameron Redus could have gone was to**

9 **his apartment, isn't that right?**

10 MR. JONES: Object, form.

11 A. I assert my Fifth Amendment privilege.

12 **Q. (BY MR. PERRY) If he fled the scene, he had no**

13 **weapon and you had his truck. Isn't that right?**

14 MR. JONES: Object, form.

15 A. I assert my Fifth Amendment privilege.

16 **Q. (BY MR. PERRY) With his truck there you would**

17 **have been able to obtain -- determine his identity and**

18 **find out where he lived, wouldn't you?**

19 MR. JONES: Form.

20 A. I assert my Fifth Amendment privilege.

21 **Q. (BY MR. PERRY) You could have asked Cameron**

22 **Redus at that point to -- to give you his address,**

23 **couldn't you?**

24 MR. JONES: Object, form.

25 A. I assert my Fifth Amendment privilege.

1 A. I assert my Fifth Amendment privilege.

2 MR. VALADEZ: And, Brent, based on the

3 earlier agreement, I just want to make sure. If David

4 states an objection, it applies to all because I'm

5 trying not to interrupt your deposition. Correct?

6 MR. PERRY: Yes.

7 MR. VALADEZ: Thank you.

8 **Q. (BY MR. PERRY) About three minutes into the**

9 **encounter, Cameron Redus asked you to tell the person**

10 **you were talking to over the radio, who was Officer**

11 **DeHoyos, your status, didn't he?**

12 MR. JONES: Object, form.

13 A. I assert my Fifth Amendment privilege.

14 **Q. (BY MR. PERRY) And he asked you to chill three**

15 **times, didn't he?**

16 A. I assert my Fifth Amendment privilege.

17 **Q. And he asked to you call in your status, didn't**

18 **he?**

19 MR. JONES: Object, form.

20 A. I assert my Fifth Amendment privilege.

21 **Q. (BY MR. PERRY) Cameron Redus wanted you to get**

22 **help, didn't he?**

23 MR. JONES: Object, form.

24 A. I assert my Fifth Amendment privilege.

25 **Q. (BY MR. PERRY) And he made that clear in his**

1 statements to you, didn't he?
 2 MR. JONES: Object, form.
 3 A. I assert my Fifth Amendment privilege.
 4 **Q. (BY MR. PERRY) And you ignored the reasonable**
 5 **requests from him, didn't you?**
 6 MR. JONES: Object, form.
 7 A. I assert my Fifth Amendment privilege.
 8 **Q. (BY MR. PERRY) If you had taken time to**
 9 **respond to his request and chill and call in your**
 10 **status, you could have obtained assistance from the**
 11 **Alamo Heights Police Department, couldn't you?**
 12 MR. JONES: Object, form.
 13 A. I assert my Fifth Amendment privilege.
 14 **Q. (BY MR. PERRY) When he told to you chill, you**
 15 **had no reasonable belief that he presented a risk of**
 16 **serious bodily injury or death to you or anyone else,**
 17 **did you?**
 18 MR. JONES: Object, form.
 19 A. I assert my Fifth Amendment privilege.
 20 **Q. (BY MR. PERRY) You had observed him drive home**
 21 **with you following him, hadn't you?**
 22 A. I assert my Fifth Amendment privilege.
 23 **Q. You knew that he was in an apartment complex**
 24 **where he -- apartment parking lot where he likely lived,**
 25 **didn't you?**

1 impaired, didn't you?
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. And you understood from your training that his**
 4 **impairment would have affected his ability to respond to**
 5 **you, didn't you?**
 6 MR. JONES: Object, form.
 7 A. I assert my Fifth Amendment privilege.
 8 **Q. (BY MR. PERRY) When all this was going on, you**
 9 **were roughly twice the size in terms of weight as**
 10 **Cameron, weren't you?**
 11 MR. JONES: Object, form.
 12 A. I assert my Fifth Amendment privilege.
 13 **Q. (BY MR. PERRY) And you had on your person or**
 14 **with you handcuffs, baton, and a gun, didn't you?**
 15 A. I assert my Fifth Amendment privilege.
 16 **Q. And you knew Cameron Redus was unarmed?**
 17 MR. JONES: Object, form. Sorry.
 18 A. I assert my Fifth Amendment privilege.
 19 **Q. (BY MR. PERRY) You knew that your failure to**
 20 **follow any known protocol for a traffic stop made the**
 21 **situation worse, didn't you?**
 22 MR. JONES: Object, form.
 23 A. I assert my Fifth Amendment privilege.
 24 **Q. (BY MR. PERRY) And you knew that you had**
 25 **failed to follow any known protocol for making a traffic**

1 MR. JONES: Object, form.
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. (BY MR. PERRY) And when you ignored these**
 4 **requests, your handcuffs and the baton were on the**
 5 **ground, weren't they?**
 6 MR. JONES: Object, form.
 7 A. I assert my Fifth Amendment privilege.
 8 **Q. (BY MR. PERRY) And your pistol was in its**
 9 **holster, wasn't it?**
 10 A. I assert my Fifth Amendment privilege.
 11 **Q. And Cameron Redus was unarmed, wasn't he?**
 12 MR. JONES: Object, form.
 13 A. I assert my Fifth Amendment privilege.
 14 **Q. (BY MR. PERRY) Several minutes into the**
 15 **encounter you told Cameron Redus that you were making a**
 16 **traffic stop, didn't you?**
 17 A. I assert my Fifth Amendment privilege.
 18 **Q. You told him you were arresting him as part of**
 19 **a traffic stop. Is that right?**
 20 A. I assert my Fifth Amendment privilege.
 21 **Q. Did you know UIW's written policy on using**
 22 **force to effect a traffic stop?**
 23 A. I assert my Fifth Amendment privilege.
 24 **Q. When you told him you -- you were making a**
 25 **traffic stop, you had the opinion that Cameron Redus was**

1 **stop as a police officer, didn't you?**
 2 MR. JONES: Object, form.
 3 A. I assert my Fifth Amendment privilege.
 4 **Q. (BY MR. PERRY) Almost eight minutes into the**
 5 **encounter, you first asked Cameron Redus for his**
 6 **address. Isn't that right?**
 7 A. I assert my Fifth Amendment privilege.
 8 **Q. And you refused to release him or you failed to**
 9 **release him so that he could answer your question,**
 10 **didn't you?**
 11 MR. JONES: Object, form.
 12 A. I assert my Fifth Amendment privilege.
 13 **Q. (BY MR. PERRY) There was nothing stopping you**
 14 **from asking Cameron Redus his address or your location**
 15 **within the first minute of your encounter with him, was**
 16 **there?**
 17 A. I assert my Fifth Amendment privilege.
 18 **Q. There was nothing stopping you from asking him**
 19 **his information before you had bear hugged him for over**
 20 **six minutes, was there?**
 21 MR. JONES: Object -- I'm sorry. Object,
 22 form.
 23 A. I assert my Fifth Amendment privilege.
 24 **Q. (BY MR. PERRY) About nine minutes into the**
 25 **encounter, you put Cameron Redus into a choke hold,**

1 didn't you?
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. And you understood a choke hold is a tight grip**
 4 **like vise hold around person's neck that restricts that**
 5 **person -- that person's ability to breathe, didn't you?**
 6 A. I assert my Fifth Amendment privilege.
 7 **Q. And you knew that a choke hold was a form of**
 8 **deadly force used by a peace officer?**
 9 A. I assert my Fifth Amendment privilege.
 10 **Q. And you used a choke hold when you had no**
 11 **reasonable belief that Cameron Redus presented a risk of**
 12 **serious bodily injury or death to you or to anyone else,**
 13 **didn't you?**
 14 MR. JONES: Object, form.
 15 A. I assert my Fifth Amendment privilege.
 16 **Q. (BY MR. PERRY) And when he freed himself from**
 17 **your choke hold, you threatened to shoot him, didn't**
 18 **you?**
 19 MR. JONES: Object, form.
 20 A. I assert my Fifth Amendment privilege.
 21 **Q. (BY MR. PERRY) Having freed himself from the**
 22 **choke hold which is a form of deadly force, Cameron**
 23 **Redus could have reasonably believed that physical**
 24 **resistance was necessary to protect himself from your**
 25 **use of deadly force, couldn't he?**

1 **injury or death to you or anyone else but you acted with**
 2 **conscious and reckless disregard of these facts by**
 3 **threatening to shoot him, didn't you?**
 4 MR. JONES: Object, form.
 5 A. I assert my Fifth Amendment privilege.
 6 **Q. (BY MR. PERRY) About 11 minutes after you**
 7 **first spoke to Cameron Redus you shot him five times and**
 8 **killed him, didn't you?**
 9 A. I assert my Fifth Amendment privilege.
 10 **Q. You knew that he was unarmed when you shot him**
 11 **five times?**
 12 MR. JONES: Object, form.
 13 A. I assert my Fifth Amendment privilege.
 14 **Q. (BY MR. PERRY) You knew that shooting someone**
 15 **is the use of deadly force, didn't you?**
 16 A. I assert my Fifth Amendment privilege.
 17 **Q. When you shot Cameron Redus, you had no**
 18 **reasonable belief that he presented a risk of serious**
 19 **bodily injury or death to you or anyone else, did you?**
 20 MR. JONES: Object, form.
 21 A. I assert my Fifth Amendment privilege.
 22 **Q. (BY MR. PERRY) And you were aware of all of**
 23 **these facts but acted with conscious and reckless**
 24 **disregard of these facts for the safety of Cameron Redus**
 25 **by shooting him, didn't you?**

1 MR. JONES: Object, form.
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. (BY MR. PERRY) And after he freed himself from**
 4 **your choke hold, he was -- I'm sorry -- he was using --**
 5 **he was unarmed when he was using physical resistance,**
 6 **wasn't he?**
 7 MR. JONES: Object, form.
 8 A. I assert my Fifth Amendment privilege.
 9 **Q. (BY MR. PERRY) You still had him in a -- in**
 10 **his -- in your grasp when you threatened to shoot him,**
 11 **didn't you?**
 12 MR. JONES: Object, form.
 13 A. I assert my Fifth Amendment privilege.
 14 **Q. (BY MR. PERRY) When you threatened to shoot**
 15 **him, you had no reasonable belief that Cameron Redus was**
 16 **a risk of serious bodily injury or death to you or**
 17 **anyone else, did you?**
 18 MR. JONES: Object, form.
 19 A. I assert my Fifth Amendment privilege.
 20 **Q. (BY MR. PERRY) When you threatened to shoot**
 21 **him, you knew he was unarmed, didn't you?**
 22 MR. JONES: Object, form.
 23 A. I assert my Fifth Amendment privilege.
 24 **Q. (BY MR. PERRY) You were aware that he was**
 25 **unarmed and that he presented no risk of serious bodily**

1 MR. JONES: Object, form.
 2 A. I assert my Fifth Amendment privilege.
 3 MR. PERRY: Did you get that, Monica?
 4 THE REPORTER: Yes.
 5 **Q. (BY MR. PERRY) Did you fabricate any evidence**
 6 **at the scene after the shooting?**
 7 A. I assert my Fifth Amendment privilege.
 8 **Q. Did you wipe down the baton to remove your**
 9 **fingerprints?**
 10 A. I assert my Fifth Amendment privilege.
 11 **Q. Have you had an opportunity to ever tell the**
 12 **truth about what happened that night?**
 13 MR. JONES: Object, form.
 14 A. I assert my Fifth Amendment privilege.
 15 **Q. (BY MR. PERRY) We know as we sit here today**
 16 **that the statement you gave was not -- was not entirely**
 17 **truthful and correct, don't we?**
 18 MR. JONES: Object, form.
 19 A. I assert my Fifth Amendment privilege.
 20 **Q. (BY MR. PERRY) Cameron Redus was unarmed when**
 21 **you shot him in the back, wasn't he?**
 22 MR. JONES: Object, form.
 23 A. I assert my Fifth Amendment privilege.
 24 **Q. (BY MR. PERRY) Cameron Redus was unarmed when**
 25 **you shot him on his -- and he was on his knees, wasn't**

1 he?
 2 MR. JONES: Object, form.
 3 A. I assert my Fifth Amendment privilege.
 4 **Q. (BY MR. PERRY) What was the look on Cameron**
 5 **Redus' face when you shot him?**
 6 A. I assert my Fifth Amendment privilege.
 7 **Q. You shot him -- you fired six shots over about**
 8 **eight seconds, didn't you?**
 9 A. I assert my Fifth Amendment privilege.
 10 **Q. What did Cameron Redus say to you when you shot**
 11 **him?**
 12 A. I assert my Fifth Amendment privilege.
 13 **Q. Did you see Cameron Redus die after you shot**
 14 **him?**
 15 A. I assert my Fifth Amendment privilege.
 16 **Q. Did Cameron Redus show you any pain and**
 17 **suffering when you shot him?**
 18 A. I assert my Fifth Amendment privilege.
 19 **Q. Did you hear any cries from Cameron Redus?**
 20 A. I assert my Fifth Amendment privilege.
 21 **Q. What were Cameron Redus' last words to you?**
 22 A. I assert my Fifth Amendment privilege.
 23 **Q. Did he yell out for his mother and his father?**
 24 A. I assert my Fifth Amendment privilege.
 25 MR. PERRY: Okay. I'm going to take a

1 statement and he said, "I assert my Fifth Amendment
 2 privilege."
 3 MR. JONES: I'm going to ask for a ruling
 4 from the special master on that, please, because the
 5 fact that he gave a statement is matter of subject to
 6 the Fifth Amendment privilege, I would challenge.
 7 MASTER IN CHANCERY: I believe that the
 8 question was -- and I'll ask that -- that -- Ms. Victor
 9 to repeat it, please -- but I believe that it was a
 10 little more than that. I think it was a lawyer and you
 11 prepared a statement. Can you please repeat the
 12 question?
 13 MR. JONES: I think that's true.
 14 Attorney-client privilege.
 15 MR. PERRY: You want me to repeat the
 16 question or are we waiting on Monica?
 17 THE REPORTER: I'm doing it.
 18 (The question was read.)
 19 MR. PERRY: The statement before that.
 20 MR. JONES: It's the question before that,
 21 Monica.
 22 (The question was read.)
 23 MR. JONES: Okay. Again, I'm going to
 24 challenge it, Master Rios, because the voluntary
 25 statement was given while he was not under arrest. It

1 short break here, but I think I'm pretty close to
 2 passing the witness.
 3 THE WITNESS: Okay.
 4 THE VIDEOGRAPHER: The time is 1:21 p.m.
 5 We're off the record.
 6 (Recess 1:21 p.m. to 1:29 p.m.)
 7 THE VIDEOGRAPHER: The time is 1:29 p.m.
 8 We're on the record.
 9 **Q. (BY MR. PERRY) Immediately after the shooting,**
 10 **you and your lawyer at that time together prepared a**
 11 **written statement that you gave to the Alamo Heights**
 12 **Police Department, didn't you?**
 13 A. I assert my Fifth Amendment privilege.
 14 **Q. When you gave that statement to the Alamo**
 15 **Heights Police Department, that written statement, you**
 16 **were not truthful, were you?**
 17 A. I assert my Fifth Amendment privilege.
 18 MR. VALADEZ: Brent, if can we go back to
 19 the last question. Are you just asking if he gave a
 20 statement or are you asking anything substantive about
 21 the statement?
 22 MR. PERRY: I asked him if he was truthful.
 23 MR. JONES: That goes to the substance, I
 24 think.
 25 MR. PERRY: I asked him if he gave a

1 was provided to the Texas Ranger in the presence of his
 2 attorney and Sergeant Tom Vitacco. It was sworn under
 3 oath and it states: "I am voluntary submitting this
 4 statement to Ranger Keith Pauska. I'm giving this
 5 statement without any threats or promises and on my own
 6 free will. This statement may be used for whatever
 7 purpose deemed necessary. Therefore, the statement is
 8 not covered by Garrity because Garrity requires that
 9 statement be given under compulsion of potential loss of
 10 employment.
 11 There was no UIW employee present when
 12 Corporal Carter made that statement. And there was no
 13 objectively reasonable belief that his statement would
 14 implicate his job. So I'm challenging the Fifth
 15 Amendment privilege assertion to that statement.
 16 MASTER IN CHANCERY: Are there any rebuttal
 17 arguments?
 18 MR. VALADEZ: I'm sorry.
 19 THE REPORTER: One at a time.
 20 MR. VALADEZ: My only -- my position is
 21 that the substance of the statement that would invade
 22 his -- if he's questioned about it, would invade his
 23 Fifth Amendment because he -- he has to -- I don't know
 24 what the questions are yet. My only question asking
 25 about that -- that this particular question is if he's

1 just asking merely that a statement was given, I believe
2 that there is case law from the -- from Judge
3 Rodriguez's court here in San Antonio. That's in Garza
4 Construction Services versus Hallandale that says that
5 questions merely about the -- whether a statement exists
6 or whether, you know, you were questioned, that that
7 doesn't ask incriminatory -- for incriminatory
8 statements. Things that go beyond that, I believe do
9 invade anything that could potentially be -- ask the
10 witness to make statements that could be deemed
11 incriminatory I believe are covered by the Fifth
12 Amendment. That's why I was asking for that
13 clarification.

14 MR. JONES: At this point then, Master
15 Rios, I will -- I will limit my challenge to the fact
16 that a statement was given as -- as pointed out by
17 Mr. Valadez and Judge Rodriguez's prior ruling.

18 MASTER IN CHANCERY: I agree with that.
19 The fact that a statement was given I do not believe is
20 protected under the Fifth Amendment. I am not making
21 any kind of ruling on the contents of that statement or
22 any question following up on the statement.

23 MR. JONES: Understood. So are you
24 directing the witness then to the question, Master Rios?

25 MASTER IN CHANCERY: Yes, I am. Please

1 A. Yes.

2 Q. Corporal, is it a commission of a crime to
3 strike a police officer?

4 A. Yes.

5 Q. Is a citizen obligated to obey a lawful order
6 given to him by a police officer?

7 A. Yes.

8 Q. Once a police officer is struck with a baton by
9 a -- by an individual citizen or a suspect, can that
10 police officer reasonably be in fear for their life?

11 MR. PERRY: Objection, form.

12 MR. VALADEZ: Just to make sure, David,
13 you're asking general questions from his training?

14 MR. JONES: I am.

15 MR. VALADEZ: Nothing about the incident
16 that night?

17 MR. JONES: Not at this point, I'm not.

18 MR. VALADEZ: Could you repeat your
19 question again?

20 MR. JONES: Can you read it back, please?

21 (The question was read.)

22 A. Yes.

23 MR. JONES: Mary Morales is my legal
24 assistant/paralegal on here. I'd like for her to put up
25 the photographs, please, which I'll need to have marked

1 answer the question whether a statement was given.

2 A. Yes.

3 Q. (BY MR. PERRY) Officer Carter, were you under
4 the influence of alcohol or drugs during the encounter
5 with Cameron Redus?

6 A. I assert my Fifth Amendment privilege.

7 Q. Did Cameron Redus yell or scream out at the
8 first shot?

9 A. I assert my Fifth Amendment privilege.

10 Q. At the second shot?

11 A. I assert my Fifth Amendment privilege.

12 Q. Or any of the other three shots?

13 A. I assert my Fifth Amendment privilege.

14 MR. PERRY: I'll pass the witness.

15 (1:35 p.m.)

16 EXAMINATION

17 BY MR. JONES:

18 Q. Corporal Carter, you have been trained in the
19 use of an ASP baton. Is that right?

20 A. Yes.

21 Q. Can an ASP baton inflict deadly wounds?

22 A. Yes.

23 Q. Was that part of your training that the ASP
24 baton if it strikes a human being in a certain area, it
25 can inflict deadly injuries?

1 in evidence. May we start, Mary, with the first --

2 MS. MORALES: Yes.

3 MR. JONES: -- photograph?

4 MS. MORALES: Can I share my screen,
5 please?

6 THE VIDEOGRAPHER: I'm sorry. Is it not
7 allowing you to do that?

8 MS. MORALES: Yes. Hang on. I just
9 wasn't -- okay. Can you-guys see them?

10 MR. JONES: No.

11 MS. MORALES: Okay. Give me a second. Got
12 it?

13 MR. JONES: Yes. Can you scroll down so
14 Officer Carter can see himself?

15 Q. (BY MR. JONES) Officer Carter, are you --

16 MR. JONES: No, no. Just the first one,
17 Mary. You're fine.

18 MS. MORALES: Okay.

19 MR. JONES: Thank you.

20 Q. (BY MR. JONES) Officer Carter, are you
21 dressed in the garb that you customarily wore on a cold
22 evening while operating as a University of Incarnate
23 Word police officer?

24 MR. PERRY: Objection, form.

25 THE REPORTER: Who was that?

1 MR. PERRY: Brent Perry.
 2 A. I assert my Fifth Amendment privilege.
 3 **Q. (BY MR. JONES) Okay. Well, I'm not asking you**
 4 **about the evening in -- in question, Officer. I'm just**
 5 **asking you about the uniform you're wearing. Was that**
 6 **your police uniform?**
 7 MR. PERRY: Objection to the form.
 8 A. Yes.
 9 **Q. (BY MR. JONES) And -- and can you describe --**
 10 **are you wearing a jacket?**
 11 A. Yes.
 12 **Q. What -- what kind of jacket is that, Corporal**
 13 **Carter?**
 14 A. It's a nylon jacket.
 15 THE REPORTER: I didn't get that.
 16 **Q. (BY MR. JONES) Back in --**
 17 THE REPORTER: Carter, can you repeat that?
 18 I'm sorry to interrupt.
 19 A. It's a nylon jacket.
 20 MR. JONES: Let -- let me ask that our
 21 reporter mark --
 22 MR. PERRY: Are we marking exhibits here?
 23 MR. JONES: I'm sorry?
 24 MR. PERRY: Are we marking exhibits here?
 25 MR. JONES: Yeah. I'm trying -- yeah. I

1 was just about to do that. And I'm not sure whether or
 2 not we have any prior numbers that I need to follow, but
 3 why don't we mark that as UIW Exhibit No. 1. Is that
 4 okay with everybody? Does that work?
 5 MR. VALADEZ: Yes, that's fine.
 6 MR. JONES: Okay. Let's mark that --
 7 MR. PERRY: Can we give the identifying
 8 information on the photo?
 9 MR. JONES: I don't know that there is
 10 identifying information. This --
 11 MR. PERRY: Well --
 12 MR. JONES: -- this photograph --
 13 THE REPORTER: One at a time.
 14 THE WITNESS: Can we take a quick break?
 15 MR. VALADEZ: Officer Carter's asked for a
 16 break, please.
 17 MR. JONES: Sure. Absolutely. Let's take
 18 a break.
 19 THE REPORTER: Let the videographer take us
 20 off the record.
 21 THE VIDEOGRAPHER: The time is 1:39 p.m.
 22 We're off the record.
 23 (Recess 1:39 p.m. to 1:47 p.m.)
 24 THE VIDEOGRAPHER: The time is 1:47 p.m.
 25 We're on the record.

1 **Q. (BY MR. JONES) Corporal Carter, are you ready**
 2 **to proceed after a break?**
 3 A. Yes.
 4 **Q. What I'm asking you to do here, Corporal, is to**
 5 **describe for me what you're wearing in this photograph.**
 6 **And you told me that you have an outer jacket on. Is**
 7 **that correct?**
 8 A. Yes.
 9 **Q. What was that jacket -- can you describe for me**
 10 **what type of jacket that was, Corporal?**
 11 A. It's just a --
 12 **Q. A leather jacket? Wind breaker? What was it?**
 13 A. It's just a nylon jacket with a liner.
 14 **Q. Okay. And -- and is the liner one that goes**
 15 **all the way down to the end of the sleeves?**
 16 A. Yes, it is.
 17 **Q. All right.**
 18 MR. JONES: May we see the next photograph
 19 down, please, Mary?
 20 **Q. (BY MR. JONES) Corporal, is that another view**
 21 **of you from the side wearing that jacket?**
 22 A. Yes.
 23 **Q. All right, sir.**
 24 MR. JONES: Go down to the -- and I'm going
 25 to mark that as UIW No. 2. Let's go to the next

1 photograph, please.
 2 **Q. (BY MR. JONES) And, Corporal, is this another**
 3 **photograph of you wearing the jacket from the rear?**
 4 A. Yes.
 5 MR. JONES: I'll mark that as UIW No. 3.
 6 **Q. (BY MR. PERRY) And then, again, Corporal, is**
 7 **this a photograph of you showing your corporal's**
 8 **insignia wearing the same jacket?**
 9 A. No. The jacket's not on in that picture.
 10 **Q. Oh, okay. So now this is your -- your shirt.**
 11 **Is that right?**
 12 A. A shirt with a long-sleeve undershirt.
 13 **Q. All right, sir. Now, is -- is this --**
 14 MR. JONES: I'm going to ask that this
 15 photograph be marked as UIW No. 4.
 16 **Q. (BY MR. JONES) Corporal, are you wearing short**
 17 **sleeves here? A short-sleeve shirt?**
 18 A. A short-sleeve uniform shirt and a long-sleeve
 19 undershirt.
 20 **Q. All right, sir. And is that customarily what**
 21 **you wore in cold weather?**
 22 A. Yes.
 23 **Q. All right, sir.**
 24 MR. JONES: Next photograph, please.
 25 **Q. (BY MR. JONES) Now, it's a little bit**

1 clearer, Corporal, in UIW -- what I'll mark as UI -- UIW
 2 No. 5 for identification. We can see here the short
 3 sleeves on the shirt that you have on. Is that right,
 4 sir?
 5 A. Yes.
 6 Q. And is that customarily how you dress when you
 7 have cold weather?
 8 A. Yes.
 9 Q. It appears, Corporal, you're wearing a
 10 long-sleeve -- is that like a long-sleeve cotton shirt?
 11 A. It's a long sleeve thermal.
 12 Q. Thermal shirt?
 13 A. Yes.
 14 Q. And underneath that, Corporal, are you also
 15 wearing a -- a -- what I'll call a T-shirt, a white
 16 T-shirt?
 17 A. Yes, a white undershirt as well.
 18 Q. And I see here there's a badge hanging or
 19 something hanging from your right pocket, Corporal.
 20 What is that?
 21 A. That's my university employee ID badge.
 22 Q. All right, sir. And then above that appears to
 23 be your name. Is that correct, Corporal?
 24 A. Yes, that's correct.
 25 Q. And then on your left side, I see a pen in a

1 pocket. And what is the insignia patch next to that
 2 pen?
 3 A. That is the employment badge patch.
 4 Q. All right, sir. And is that -- does that
 5 photograph fairly and -- and accurately portray the way
 6 that you are dressed in cold weather?
 7 A. Yes.
 8 Q. All right, sir.
 9 MR. JONES: Go to the next photograph,
 10 please. We're going to skip this one. I've already
 11 gone through that. Go to the next one, please, Mary.
 12 Go to next one. Okay. Let's take the photographs down
 13 for right now, Mary.
 14 Q. (BY MR. JONES) Now, Corporal, the photographs
 15 that we've just looked at, do those fairly and
 16 accurately portray the way that you are dressed when you
 17 are on duty at UIW in cold weather?
 18 A. Yes.
 19 Q. All right, sir.
 20 MR. JONES: Mary, would you put up the
 21 voluntary statement, please? And -- and go to page --
 22 well, no. Let's stay on this page first. Let me mark
 23 this as UIW No. 6, please.
 24 MR. VALADEZ: ?? 6?
 25 MR. JONES: UIW 6. If you would scroll

1 down a little bit, Mary.
 2 Q. (BY MR. JONES) Corporal, do you see --
 3 MR. JONES: Stop, Mary.
 4 Q. (BY MR. JONES) Corporal, do you see where it
 5 says, "initials"?
 6 A. I see that.
 7 Q. And the initials are CJC?
 8 A. I see that.
 9 Q. Is that your writing, Corporal?
 10 MR. VALADEZ: Hold on real quick. Again,
 11 I'm going to ask Master Rios --
 12 MR. JONES: May I ask --
 13 MR. VALADEZ: I'm just asking if you
 14 determined whether this would violate the Fifth, him
 15 just identifying his initials.
 16 MR. JONES: Well, and -- and to assist the
 17 Master, there are a couple cases that are significant.
 18 The Fifth Circuit has ruled that identification of the
 19 signature is not -- signature or writing is not
 20 privileged under the Fifth Amendment. The United States
 21 Supreme Court has also decided in Gilbert versus
 22 California that signatures are not covered by the Fifth
 23 Amendment. So I would ask -- without getting into the
 24 substance of this voluntary statement at this time that
 25 the witness be directed to identify whether that is his

1 signature or his initials.
 2 MASTER IN CHANCERY: I would agree. I
 3 would ask Mr. Carter to please identify whether that's
 4 his initials or his signature. That is not a ruling or
 5 decision that any of the substance of the statement
 6 is -- has to be answered by Mr. Carter, though.
 7 MR. JONES: Yes, sir. I understand that.
 8 Thank you, Master Rios.
 9 Q. (BY MR. PERRY) Corporal Carter, are those your
 10 initials?
 11 A. Those are my initials.
 12 Q. All right, sir.
 13 MR. JONES: Go to the bottom of the page,
 14 please, Mary.
 15 Q. (BY MR. JONES) On the bottom of the page,
 16 Corporal, it shows --
 17 MR. JONES: Down a little bit further,
 18 Mary, so we can see the -- the writing where it says 2
 19 of 5.
 20 MS. MORALES: I'm sorry, David. I didn't
 21 hear you. What did you say?
 22 MR. JONES: Down a little bit to the bottom
 23 of the page, Mary. We can't see the bottom of the page.
 24 There we go.
 25 Q. (BY MR. JONES) On the left, Corporal, it -- it

1 has initials CJC again. Are those your initials,
 2 Corporal?
 3 A. Those are my initials.
 4 Q. And did you make -- did you write those
 5 initials on this page?
 6 A. I'm sorry. Can you repeat the first part?
 7 Q. Yes, sir. Did you write those initials on this
 8 page?
 9 A. Yes, I did.
 10 Q. All right, sir. And to the right we see,
 11 again, CJC over the confidential line here. And for
 12 purposes of the record, this is UIW 1591. Did you write
 13 those initials CJC, Corporal?
 14 A. Yes, I did.
 15 Q. All right, sir.
 16 MR. JONES: Let's go to the next page,
 17 please, Mary. And go to the bottom of this page if you
 18 would.
 19 Q. (BY MR. JONES) This is UIW 1592 in Exhibit UIW
 20 No. 6. Again, to the left we see initials CJC. Are
 21 those your initials, Corporal?
 22 A. Yes.
 23 Q. Did you write those initials on this page?
 24 A. Yes.
 25 Q. All right, sir.

1 Did I read that correctly, Corporal?
 2 MR. VALADEZ: Same question to you, Master
 3 Rios.
 4 MR. JONES: I'm -- I'm not asking him
 5 whether that's -- all I'm asking at this point in time,
 6 Mr. Valadez, is did I read it correctly.
 7 Q. (BY MR. JONES) It says 12/6/2013. Did I read
 8 that correctly, sir.
 9 MASTER IN CHANCERY: He can answer the
 10 question.
 11 A. Yes, you've read that correctly.
 12 Q. (BY MR. JONES) And it indicates to the left
 13 that the time is 10:51 a.m. Did I read that correctly,
 14 Corporal?
 15 MR. VALADEZ: Objection, form.
 16 A. Yes, you read that correctly.
 17 Q. (BY MR. JONES) Now, let me --
 18 MR. JONES: Go to the bottom of that page,
 19 please, Mary.
 20 Q. (BY MR. JONES) And by the way, Corporal,
 21 the -- the -- what I just read and --
 22 MR. JONES: Mary, I'm sorry. Let's go back
 23 up to the top of that page. I apologize for moving you
 24 down too quickly. Right there. Right there, Mary.
 25 Q. (BY MR. JONES) Corporal, the -- where -- the

1 MR. JONES: Let's go to the next page,
 2 Mary.
 3 Q. (BY MR. JONES) And this is page UIW 1593 in
 4 what has been marked for purposes of identification UIW
 5 Exhibit 6. We see again initials and then the writing
 6 CJC. Is that your writing, Corporal?
 7 A. Yes.
 8 Q. And did you make those initials on this page?
 9 A. Yes.
 10 MR. JONES: Let's go to the next page if we
 11 may, Mary.
 12 Q. (BY MR. JONES) Corporal, do you see where it
 13 says, "Signature of Person Giving Statement"?
 14 A. I see it.
 15 Q. Is that your signature, Corporal?
 16 MR. VALADEZ: Just -- and by the way,
 17 Master Rios, does the same ruling apply to that
 18 question?
 19 MASTER IN CHANCERY: Yes, it does.
 20 A. Yes, it is.
 21 Q. (BY MR. JONES) Please answer, Corporal. I'm
 22 sorry?
 23 A. Yes, that is my signature.
 24 Q. All right, sir. And it reflects that -- the
 25 document reflects that you signed it on 12/6 of 2013.

1 writing that we just read at 10:51 a.m. and 12/6/2013,
 2 is that your handwriting, sir?
 3 A. Yes.
 4 Q. All right, sir.
 5 MR. JONES: Now, if we may go to the
 6 bottom, please.
 7 Q. (BY MR. JONES) All right. And I want you to
 8 read along with me, Corporal, and ask me -- and tell me
 9 if I've read this correctly. It says, "Subscribed and
 10 sworn to before me, Keith Pauska, a -- I can't see if
 11 there's a word next to it.
 12 MR. JONES: Is there a word next to the --
 13 where it says, "A," Mary?
 14 A. I can't see it either.
 15 Q. (BY MR. JONES) "Subscribed and sworn to before
 16 me, Keith Pauska, a officer of the State of Texas and
 17 pursuant to Section 602.002 Texas Government Code, on
 18 the 6th day of December A.D. 2013." Did I read that
 19 correctly?
 20 MR. PERRY: Objection, form.
 21 MR. VALADEZ: Just to make sure. Master
 22 Rios, does your same ruling apply to these questions?
 23 MASTER IN CHANCERY: Yes. And -- and just
 24 for the record it's a peace officer. The word "peace"
 25 is --

1 MR. JONES: Oh. Thank you. Thank you,
 2 Master Rios. I -- it's cut off on my screen. I can't
 3 see it.
 4 **Q. (BY MR. JONES) Let me read it again, Corp --**
 5 **Corporal. "Subscribed and sworn to before me, Keith**
 6 **Paska, a peace officer of the State of Texas and**
 7 **pursuant to Section 602.002 Texas Government Code on the**
 8 **6th day of December A.D. 2013." Did I read that**
 9 **correctly, Corporal?**
 10 MR. PERRY: Objection, form.
 11 A. Yes.
 12 **Q. (BY MR. JONES) And below that, again, we see**
 13 **initials. Did you write the initials CJC in the lower**
 14 **left corner of this page?**
 15 A. I wrote those initials.
 16 **Q. All right, sir. Thank you.**
 17 MR. JONES: Now, Mary, you can take UIW
 18 Exhibit No. 6 down.
 19 **Q. (BY MR. JONES) And now I'd like to ask you to**
 20 **listen to what I'm going to mark as UIW No. 7. And I**
 21 **would like you to identify, Corporal Carter, whether**
 22 **this is your voice.**
 23 MR. JONES: Mary, would you play it?
 24 MR. VALADEZ: Just before we get started.
 25 Master Rios, what's your opinion on that?

1 MR. JONES: Let me --
 2 MASTER IN CHANCERY: I have no idea what
 3 he's about to play.
 4 MR. JONES: I'm -- I'm about to play -- I'm
 5 asking the Corporal to identify his voice and under
 6 Schoenbrun versus U.S., 403F 2nd 56th, which is the
 7 Fifth Circuit -- a determination is made that the
 8 identification of a voice is not subject to a Fifth
 9 Amendment. So all I'm asking him is is -- is this a
 10 recording of his voice.
 11 MASTER IN CHANCERY: Can you give me a
 12 cite --
 13 MR. JONES: It's just a few seconds,
 14 Robert.
 15 MASTER IN CHANCERY: Can you give me a cite
 16 of the case, please?
 17 MR. JONES: Yes, sir.
 18 MASTER IN CHANCERY: The cite of the case.
 19 MR. JONES: Let's me see. I -- I'll go
 20 through -- rely on Taylor for that.
 21 Taylor, can you -- can you give us a cite
 22 of the Schoenbrun as well United States versus Ramos?
 23 And give the Master also Gilbert versus California cite,
 24 please. So we've got Gilbert versus California, United
 25 States versus Ramos, and -- what's the one I just said?

1 Schoenbrun versus U.S. Would you get the Master those
 2 three cites, please, Taylor?
 3 MS. BEAVER: Gilbert versus California is
 4 87 Supreme Court, 1951.
 5 MASTER IN CHANCERY: Ms. Beaver, let me
 6 interrupt you real quick. If you have those cases, can
 7 you e-mail them to me very quickly, please?
 8 MS. BEAVER: Yes, I can do that.
 9 THE REPORTER: This is the court reporter.
 10 I don't want to interrupt, but when -- this is a matter
 11 of when they're playing the recording. Do you want me
 12 to write what they're saying in the recording or put a
 13 parenthetical that you're playing the recording? That
 14 was directed to the Master, I guess.
 15 MR. JONES: Oh, okay.
 16 MASTER IN CHANCERY: Yeah. You should take
 17 down what they're --
 18 THE REPORTER: Because I --
 19 MASTER IN CHANCERY: What the recording
 20 states.
 21 THE REPORTER: I normally don't do that,
 22 Master, because I've not -- I may not understand
 23 something and I don't want to interrupt it.
 24 MASTER IN CHANCERY: The only problem is I
 25 don't know what the quality of the recording is or what

1 the recording is about. So I cannot tell you what -- if
 2 you should or should not. I believe this is being
 3 recorded by video as well, though. So I think -- I
 4 think maybe if you just -- I think as long as you state
 5 that a recording was played and the video picks it up, I
 6 think we're fine with that.
 7 THE REPORTER: That's what I would like to
 8 do. Thank you very much.
 9 MASTER IN CHANCERY: What I would ask the
 10 parties to do, though, is if Ms. Beaver sends me those
 11 cases, that we take a -- a quick ten-minute break so
 12 that I can read those cases and make sure that I -- I
 13 make an informed decision.
 14 MR. JONES: Absolutely. In fact, you want
 15 to -- you want to take a break now, Master Rios, and --
 16 MASTER IN CHANCERY: Yes, please. As long
 17 as Ms. Beaver sent me those cases, let's go ahead and
 18 take a break now.
 19 MR. JONES: All right.
 20 THE VIDEOGRAPHER: The time is 2:01 p.m.
 21 We're off the record.
 22 (Recess 2:01 p.m. to 2:15 p.m.)
 23 THE VIDEOGRAPHER: The time is 2:15 p.m.
 24 We're on the record.
 25 MASTER IN CHANCERY: Before we proceed with

1 a recording, can I ask Mr. Jones to identify what he
 2 wants to play?
 3 MR. JONES: Yeah. How would you like me do
 4 that, Master Rios? How do you want me to --
 5 MASTER IN CHANCERY: Just a -- if you could
 6 just give me a description of -- of what you seek to
 7 play.
 8 MR. JONES: It is three lines of -- three
 9 phrases that Corporal Carter uttered.
 10 MASTER IN CHANCERY: Is it on the day in
 11 question?
 12 MR. JONES: It's on the day in question.
 13 MASTER IN CHANCERY: Mr. Valadez, have you
 14 heard the recording? Is it something that was exchanged
 15 in discovery or by subpoena?
 16 MR. VALADEZ: What is it -- what is it
 17 from, David?
 18 MR. JONES: It is from the recording of the
 19 event.
 20 MR. VALADEZ: And you're asking him --
 21 you're going to ask him just is that his voice?
 22 MR. JONES: I'm just going to ask him if
 23 that his voice. Three phrases.
 24 MR. VALADEZ: You're not going to ask when
 25 it was taken, any of those questions?

1 answer whether any of the statements are truthful,
 2 correct or any other subsequent question.
 3 MR. VALADEZ: Okay.
 4 MR. JONES: Thank you, Master.
 5 Okay. Mary, would you please go ahead and
 6 play the recording we discussed? I'm going to mark this
 7 as UIW Exhibit No. 7.
 8 MASTER IN CHANCERY: I'm not sure if I'm
 9 the only one, but I didn't hear anything.
 10 MR. VALADEZ: No, I didn't hear it.
 11 MR. JONES: It's loading up.
 12 MASTER IN CHANCERY: Okay.
 13 THE VIDEOGRAPHER: Mary, when you go to
 14 share that screen, click on the bottom left. It'll say,
 15 "share computer audio." Make sure that's selected
 16 before you share your screen.
 17 (UIW Exhibit No. 7 audio recording was
 18 played.)
 19 **Q. (BY MR. JONES) Corporal Carter, you've had the**
 20 **opportunity to listen to UIW Exhibit No. 7. Would you**
 21 **please advise us, is that your voice?**
 22 A. That sounds like my voice.
 23 MR. JONES: I pass the witness at this
 24 time. Thank you, Corporal.
 25 THE REPORTER: Mr. Perry, you're muted.

1 MR. JONES: No. I'm just going to ask is
 2 this your voice.
 3 MR. VALADEZ: Obviously, you know, Master,
 4 I mean, my -- my position is obviously I don't want to
 5 do anything that in -- that constitutes a waiver of his
 6 Fifth Amendment right. You know, the -- that's the
 7 reason I'm asking for your -- for your guidance here.
 8 MASTER IN CHANCERY: And -- and -- and
 9 here's my issue. If it's a question as to whether
 10 that's his voice to use as an exemplar, I believe it's
 11 allowed under Gilbert versus State of California. The
 12 only issue I have, if it's a long recording concerning
 13 the incident of the day in question, I don't want it to
 14 be an issue where now it's introduced as a truthful or
 15 untruthful or any other kind of statement. If it is --
 16 MR. JONES: Master, it is not --
 17 MASTER IN CHANCERY: -- a question as to
 18 whether it's his voice --
 19 MR. JONES: Master, it is not a long
 20 recording. My guess is it's a matter of seconds.
 21 MASTER IN CHANCERY: All right. As long as
 22 it -- then my -- then my ruling would be this.
 23 Mr. Carter should identify whether that's his voice.
 24 The identification and the ruling has nothing to do with
 25 any waiver of Fifth Amendment rights. And he is not to

1 (2:19 p.m.)
 2 FURTHER EXAMINATION
 3 BY MR. PERRY:
 4 **Q. In the statement that is UIW Exhibit 6, did you**
 5 **tell the truth about the events of December 6th?**
 6 MR. VALADEZ: I'm going to -- I'm going to
 7 advise my client that I recommend he refuse to answer
 8 based upon his Fifth Amendment privilege.
 9 A. I refuse to answer based upon my Fifth
 10 Amendment privilege.
 11 MR. PERRY: I'll pass the witness.
 12 THE REPORTER: Anybody else?
 13 MR. JONES: Let me -- yeah. Let me take
 14 a -- let me take a few-minute break and make sure
 15 there's nothing else that I have to ask the Corporal.
 16 Okay? Thank you very much.
 17 THE VIDEOGRAPHER: The time is 2:20 p.m.
 18 We're off the record.
 19 (Recess 2:20 p.m. to 2:25 p.m.)
 20 THE VIDEOGRAPHER: The time is 2:25 p.m.
 21 We're on the record.
 22 MR. JONES: Corporal Carter, I -- I
 23 appreciate very much your -- your courtesy and the time
 24 you've given us today. I have nothing further for you.
 25 Thank you.

1 MR. PERRY: And the same for me, Officer
 2 Carter. Thank you for your time today.
 3 MR. VALADEZ: Monica, will you send -- for
 4 his review and signature, will you send his deposition
 5 to -- to me?
 6 THE REPORTER: Yes, sir. And did you
 7 want a copy also for -- y'all have been ordering a copy
 8 in this case. Do you want a copy of the transcript?
 9 MR. VALADEZ: Yes, we do. But -- but Emily
 10 is -- is the brains of our operation and she -- she is
 11 the one you've got to deal with.
 12 THE REPORTER: Okay. I will. I'll get
 13 it -- I'll get it done. Thank you.
 14 Mr. Perry, will you state your order for
 15 the record, please?
 16 MR. PERRY: Yes. I need an electronic
 17 copy.
 18 THE REPORTER: And Mr. Jones?
 19 MR. JONES: Yes. A copy of the video and
 20 the condensed copy, please.
 21 THE VIDEOGRAPHER: Okay. The time is
 22 2:26 p.m. We're off the record.
 23 (Deposition concluded at 2:26 p.m.
 24 Exhibits 1, 6, 9, 10, 13, 14, 17, 22, 23,
 25 27, 33 through 35, 42, 47, 48, 50 through

1 CORRECTION PAGE
 2 WITNESS NAME: CHRISTOPHER J. CARTER DATE: 01/15/2021
 3 PAGE LINE CHANGE REASON
 4 _____
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 _____

1 56, 58, 59, 61 through 66, 68 through 71.
 2 And UIW Exhibits 1 through 7 are attached.
 3 hereto.)
 4
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 SIGNATURE PAGE
 2
 3 I, CHRISTOPHER J. CARTER, have read the foregoing
 4 deposition and hereby affix my signature that same is
 5 true and correct, except as noted on the correction
 6 page.
 7 _____
 8 CHRISTOPHER J. CARTER
 9
 10 THE STATE OF TEXAS)
 11 COUNTY OF _____)
 12 Before me _____ on this day
 13 personally appeared _____ known to me
 14 [or proved to me on the oath of _____ or
 15 through _____ (description of identity
 16 card or other document)] to be the person whose name is
 17 subscribed to the foregoing instrument and acknowledged
 18 to me that he/she executed the same for the purposes and
 19 consideration therein expressed.
 20 Given under my hand and seal of office this _____
 21 day of _____, 2021.
 22 _____
 23 NOTARY PUBLIC IN AND FOR
 24 THE STATE OF TEXAS
 25 My Commission Expires: _____

1 CAUSE NO. 2014-CI-07249
 2 VALERIE REDUS, INDIVIDUALLY,) IN THE DISTRICT COURT OF
 AND ROBERT M. REDUS,)
 3 INDIVIDUALLY AND AS)
 ADMINISTRATOR OF THE ESTATE)
 4 OF ROBERT CAMERON REDUS)
 5 VS.) BEXAR COUNTY, TEXAS
)
 6)
 UNIVERSITY OF INCARNATE WORD)
 7 AND CHRISTOPHER CARTER) 150TH JUDICIAL DISTRICT
 8 VOLUME 1 OF 1
 9 REPORTER'S CERTIFICATION
 ORAL AND VIDEOTAPED DEPOSITION OF
 10 CHRISTOPHER J. CARTER
 JANUARY 8, 2021
 (CONDUCTED REMOTELY)

11 I, MONICA VICTOR, Certified Shorthand Reporter and
 12 Notary Public in and for the State of Texas, hereby
 certify to the following:

13 That the witness, CHRISTOPHER J. CARTER, was duly
 sworn by the officer and that the transcript of the oral
 14 deposition is a true record of the testimony given by
 the witness;

15 That the deposition transcript was submitted on
 _____ to the witness or to the attorney for
 16 the witness for examination, signature and return to
 Worldwide Court Reporters, Inc., by _____;

17 That the amount of time used by each party at the
 deposition is as follows:

- 18 Mr. Brent C. Perry - 3 Hours, 11 Minutes
- 19 Mr. David V. Jones - 0 Hours, 32 Minutes
- 20 Mr. Robert A. Valadez - 0 Hours, 0 Minutes

21 That pursuant to information given to the
 deposition officer at the time said testimony was taken,
 the following includes counsel for all parties of
 22 record:

- 23 Mr. Brent C. Perry - ATTORNEY FOR PLAINTIFFS
- Mr. David V. Jones - ATTORNEY FOR DEFENDANT
- 24 UNIVERSITY OF THE INCARNATE WORD
- Mr. Robert A. Valadez - ATTORNEY FOR DEFENDANT
- 25 CHRISTOPHER CARTER

FURTHER CERTIFICATION UNDER RULE 203 TRCP

1 The original deposition was/was not returned to the
 2 deposition officer on _____;

3 If returned, the attached Changes and Signature
 4 page contains any changes and the reasons therefor;

5 If returned, the original deposition was delivered
 6 to Mr. Brent C. Perry, Custodial Attorney;

7 That \$ _____ is the deposition officer's
 8 charges to Plaintiffs for preparing the original
 9 deposition transcript and any copies of exhibits;

10 That the deposition was delivered in accordance
 11 with Rule 203.3 and that a copy of this certificate was
 12 served on all parties shown herein and filed with the
 13 Clerk.

14 Certified to by me this _____ day of
 15 _____, 2021.

16 _____
 17 Monica Victor, CSR No. 3076
 18 Expiration: January 17, 2023
 19 FIRM REGISTRATION NO. 223
 20 WORLDWIDE COURT REPORTERS, INC.
 21 3000 Wesleyan, Suite 235
 22 Houston, Texas 77027
 23 Phone: 800.572.1101
 24 Facsimile: 713.572.2009
 25

1 I further certify that I am neither counsel for,
 2 related to, nor employed by any of the parties in the
 action in which this proceeding was taken, and further
 3 that I am not financially or otherwise interested in the
 outcome of the action.

4 Further certification requirements pursuant to Rule
 203 of TRCP will be certified to after they have
 occurred.

5 CERTIFIED to by me this _____ day of
 6 2021.

7 _____
 8 Monica Victor, CSR No. 3076
 9 Expiration: January 17, 2023
 10 FIRM REGISTRATION NO. 223
 11 WORLDWIDE COURT REPORTERS, INC.
 12 3000 Wesleyan, Suite 235
 13 Houston, Texas 77027
 14 Phone: 800.572.1101
 15 Facsimile: 713.572.2009



A	acknowledged	76:15 129:18 140:2	107:3,6,9,13 107:18,22	anger 70:6 75:14
A-shift 72:9,22 75:25 78:17	act 109:4	agreed 49:22	108:1,6,10,15 108:20,24	animal 55:9
A.D 144:18 145:8	acted 115:22 123:1,23	agreement 4:11 8:5 12:6 35:1 49:11,16,19 50:1 54:21 67:20 100:8 111:7 116:3	109:2,5,11,18 109:22 110:1,4 110:7,10,18,20 110:25 111:13 111:17,20,25 112:5,13,20 113:2,14,18,23 114:6,11,15,20 114:25 115:6 115:11,15,19 116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	Ann 7:12 Annette 2:21 47:12 73:9,15 73:21 74:3,4 75:7
a.m 1:18 2:19 5:5 8:1 10:11 38:22,24,24,25 39:13,15,15,16 41:15,17,17,18 42:17,18,18,19 61:10 71:18,20 71:20,21 81:15 103:11 143:13 144:1	acting 42:7 82:7 90:18	ahead 8:24,25 9:23,24 10:5 35:25 64:14,15 64:19 65:20 105:19 148:17 151:5	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	announce 9:2 annual 24:7 92:11 95:4
ability 119:4 121:5	action 80:23 81:1 158:2,3	Aguirre 7:22	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	answer 11:19 12:4,11 13:6,8 41:3 42:3,5 43:6,13,15,16 43:17,25 44:3 44:12,13,18,20 44:22 45:18 64:19 65:19 85:9 87:15,20 88:13 95:15 99:9,16,17,18 110:16,17,21 111:1 113:13 120:9 130:1 142:21 143:9 151:1 152:7,9
able 43:12 114:17	actions 46:18	ahead 8:24,25 9:23,24 10:5 35:25 64:14,15 64:19 65:20 105:19 148:17 151:5	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	answered 84:14 87:17 140:6
above-styled 1:16	activate 104:19	air 70:15	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	answering 111:8
Absolutely 134:17 148:14	activated 80:6	AKERMAN 7:6	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	Anthony 83:10
academic 58:17	address 8:13 10:9 76:19 114:22 120:6 120:14	Alamo 96:21 107:24 114:2 117:11 126:11 126:14	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	Antone 31:13
Academy 16:25 17:4,10 18:23 19:2	addressed 76:16	alcohol 97:25 130:4	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	Antonio 1:22 3:18,19 4:19 4:21 6:5,21 7:7 7:13,19 8:9 9:6 9:16,20 10:10 13:25 14:12 16:12,13,16,25 21:24 25:13 28:24 55:7,8 57:7 79:8,13 79:17 96:21 129:3
Acadia 105:4	adjust 10:16,19	alcoholic 86:1	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	Antonio's 31:14 31:20
accident 83:5 85:22 86:19 87:9,24	adjuster 25:6,10	allegation 65:3 65:10	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	anybody 42:12 43:14 152:12
accommodate 12:9,22	administering 8:12	alleged 53:11	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
accurate 13:23 14:11 19:21 21:3,18 22:19 22:21 28:11 34:17 38:12 60:10 79:18 101:9	administration 52:6,15	allowed 53:1 79:15 99:18 150:11	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
accurately 138:5 138:16	ADMINISTR... 1:4 157:3	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
accusatory 88:1 88:9	Administrator... 3:7,9	Amendment 13:14 45:5 47:24 48:7 49:6,13 50:2 50:16 101:22 102:2,6,10 103:9 104:13 104:18,22 105:2,12,24 106:2,5,9,15 106:20,24	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
accused 46:19 64:21 65:6	Adriana 82:11	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	advice 44:20	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	advise 40:22 151:21 152:7	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	affairs 66:11,14	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	affix 156:3	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	afforded 47:24 49:6	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	afternoon 97:20	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	agency 22:23 26:12	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	aggressive 68:25 69:5,23 86:15	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:1,6 128:15 128:23 129:12 129:20 130:6,9 130:11,13 133:2 139:20 139:23 146:9 150:6,25 152:8 152:10	
	aggressively 70:1	altered 53:7,9 53:11,13,16	116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 	

apartment 109:8 114:9 117:23,24	approved 109:19	ASP 3:20 18:6 18:19 130:19	133:2	151:15,17
Apartments 105:5,15,23	April 17:5 21:17 32:25 33:14	130:21,23	asserted 102:3	August 2:17,20
apologize 10:20	56:2,13,21,23	assert 43:4	asserting 50:1	2:22 46:13
16:10 61:23	56:24 58:11	47:23 49:5,10	105:11 110:19	72:4 73:16
103:11 143:23	64:7,16	49:12 99:6	110:25	76:12,12 81:2
appeal 55:14	area 25:13	101:22 102:2,6	assertion 50:16	81:19,21 92:4
appear 86:3	130:24	102:10 103:9	128:15	92:22
appearances 2:3 8:18	arguably 41:25	104:13,18,22	assertions 45:5	Austin 16:14
appeared 85:22 156:12	arguments 128:17	105:2,12,24	assigned 24:25	auto 25:17,19
appears 31:17 33:10 137:9,22	armed 115:17	106:2,5,9,15	34:2 61:7	available 100:17
applicants 91:16	arms 111:22	106:20,24	assist 139:16	aware 62:25
application 3:7 3:9,21 4:7,15	arrest 108:17,23 109:16 111:12	107:3,6,9,13	assistance 117:10	63:24 70:3
4:19,22,24	112:15 113:17	107:18,22	assistant 16:14	77:11 88:16
19:17 55:25	127:25	108:1,6,10,15	84:4,13,16,19	105:13,21
56:12 91:2	arresting 118:18	108:20,24	85:2,8	115:12,21
applied 36:10 56:21,24 57:12	arrived 85:10	109:2,5,11,18	assistant/para... 131:24	122:24 123:22
88:20 89:11	Article 47:25 49:7 50:3	109:22 110:1,4	assisted 32:5	Aycock 57:18 57:19
90:13,19 94:8	asked 18:15 36:10,11 59:25	110:7,10,14,18	assume 50:17	
applies 67:22 116:4	84:5,24 86:20	111:13,17,20	90:13	B
apply 56:17,22 56:23 88:25	106:21 107:11	112:13,20	Atascosa 4:11	B 14:23,24
89:8 91:11	114:1,21 116:9	113:2,14,18,23	4:13 27:2,6,9	72:14,15 88:21
142:17 144:22	116:14,17	114:6,11,15,20	27:11,18 28:8	B-shift 63:20,21 72:11
appointed 10:8 19:18 24:19	120:5 126:22	114:25 115:6	29:8 30:10	back 29:19 35:8
31:18,18 33:14	126:25 134:15	115:11,15,19	39:3,20 40:10	35:10 51:20
36:22 93:11	asking 16:11 24:1 40:22	116:1,13,16,20	attached 1:24	57:7 81:1 85:3
appointment 4:2 4:6,14,22,24	44:10 46:20	116:24 117:3,7	154:2 159:5	87:11 95:18
19:19 27:1,2	65:14,16 66:18	117:13,19,22	attachment 62:5	98:7 100:22
29:5 31:13	66:19 69:21	118:2,7,10,13	attend 96:13	102:24,25
33:10 36:19	72:8 73:18	118:17,20,23	attended 17:19	107:1 114:2
Appointment/... 4:10,18	75:6,7 120:14	119:2,7,12,15	attestation 8:16	124:21 126:18
appreciate 101:23 152:23	120:18 126:19	119:18,23	attorney 13:11	131:20 133:16
apprehension 109:20	126:20 128:24	120:3,7,12,17	13:11 43:19,20	143:22
	129:1,12	120:23 121:2,6	47:17 52:20,21	background 73:19
	129:1,12	121:9,15,20	99:21 128:2	backup 115:4
	131:13 133:3,5	122:2,8,13,19	157:15,23,23	badge 137:18,21 138:3
	135:4 139:13	122:23 123:5,9	157:24 159:8	bailiff 28:24 29:14 31:23
	143:4,5 146:5	123:13,16,21	attorney-client 45:5 48:20	32:2,7,8,12
	146:9 149:20	124:2,7,10,14	99:6 127:14	33:3,6,11
	150:7	124:19,23	attorneys 12:24	based 17:19
	asleep 85:11 86:3,10	125:3,6,9,12	40:20,24 41:22	44:23 45:4
		125:15,18,20	42:11 43:2,20	97:18,19 116:2
		125:22,24	44:8,15 45:16	152:8,9
		126:13,17	47:18 49:2	
		127:1 130:6,9	audio 5:19	
		130:11,13		

basically 17:10	better 40:7	148:15,18	call 25:16 66:15	care 54:25
basis 41:24	74:13	152:14	80:9 92:24	career 28:15
43:23	beverage 86:1	breaker 135:12	115:4 116:17	94:3
Bates 56:5 89:22	Bexar 1:5,22 4:7	breath 86:2	117:9 137:15	Carlson 6:9
baton 3:20 18:6	4:9,15,17	breathe 121:5	call-in 25:16	cars 70:17
18:19 107:16	22:25 24:12,20	Brent 6:9 8:20	called 15:13	Carter 1:8,11,15
108:12 109:7	24:22 25:1,25	11:1 35:23,24	17:16 24:24	2:4,14,16,19
112:1 118:4	26:1,4,8,15	42:8 48:6,13	30:13 47:7,8	2:21,23 3:2,5,8
119:14 124:8	27:14 29:5,19	48:19,24 49:24	58:2 78:8	3:10,13,14,16
130:19,21,24	29:25 157:5	56:3 65:20	82:20 84:24	3:20,21,23 4:3
131:8	beyond 77:2	67:20 71:13	camera 41:9	4:5,9,11,13,15
bear 109:6,13,15	96:2 129:8	89:2,22 111:6	48:3 103:17,18	4:17,19,21,24
109:15,19,23	Bill 64:25 65:2	116:2 126:18	103:20,24	5:3,7,8,10 7:10
111:22 112:6	bit 81:9 89:20	133:1 157:18	Cameron 1:4	7:16 8:4 10:12
115:23 120:19	89:21 136:25	157:23 159:8	47:21 106:11	10:16,20,25
beat 99:12	139:1 140:17	brief 60:17	106:17 107:12	11:10 13:10,20
Beaver 7:5	140:22	briefly 44:25	108:2,7,12,22	18:5 19:15
147:3,5,8	blacked 76:19	55:6 100:22	109:6,13,16,24	21:1 38:8 39:2
148:10,17	84:21	Broadway	110:2,5,12	39:18 41:20
began 19:2	blank 84:23	103:13 104:7	111:11 112:7	42:10,21 48:12
21:16 54:4,4	block 26:25	104:16,21	112:16 113:4	48:25 62:7,7
106:16	31:15 36:17	broke 87:11	113:19,25	69:1 71:25
behalf 9:4 10:1	76:18	brown 7:23	114:8,21 115:7	72:3 87:19
42:7 52:22	blow 14:3	104:10,14,20	115:13,16,21	91:22 102:24
behavior 68:11	board 58:7,8,20	104:24 105:14	115:23 116:9	128:12 130:3
68:12 69:1,5	bodily 64:12	105:22	116:21 118:11	130:18 132:14
69:23 70:1	112:16,17,22	building 109:8	118:15,25	132:15,20
belief 112:15	112:25 113:5	BURFORD 6:10	119:10,16	133:13,17
113:4 117:15	115:8 117:16	Burr 65:1	120:5,14,25	135:1 140:3,6
121:11 122:15	121:12 122:16	business 8:13	121:11,22	140:9 145:21
123:18 128:13	122:25 123:19	10:9	122:15 123:7	149:9 150:23
believe 17:5,13	bog 40:6		123:17,24	151:19 152:22
22:25 30:1,11	bother 59:21		124:20,24	153:2 155:2
33:23 35:13	bottom 91:23	C	125:4,10,13,16	156:2,6 157:7
40:1,22 43:6	140:13,15,22	c 6:1,9 7:1 8:7	125:19,21	157:9,13,25
52:24 74:4	140:23 141:17	88:23 157:18	130:5,7 157:4	Carter's 134:15
81:3,21 83:25	143:18 144:6	157:23 159:8	campus 68:9	case 30:18 49:21
91:12,17 96:20	151:14	C-shift 61:7,9	83:2,12 84:2	74:13 80:7
100:6 104:5	bperry@burf...	62:6 63:18	103:12,13,15	129:2 146:16
127:7,9 129:1	6:12	72:18 81:16,18	103:21 104:7	146:18 153:8
129:8,11,19	brains 153:10	82:8,17 93:12	115:4	cases 49:23
148:2 150:10	break 12:9,20	103:2	card 13:14 48:2	139:17 147:6
believed 62:7	35:25,25 38:21	COUNSEL 7:2	48:5,5,15,16	148:11,12,17
112:8 121:23	71:14 102:14	cadet 55:9	49:1,4 50:21	Cash 15:22,23
belive 85:1	126:1 134:14	California	156:13	16:18
best 11:18 43:20	134:16,18	139:22 146:23	Cardenas 57:24	cashier 15:16
58:5,7	135:2 148:11	146:24 147:3	57:25	Caucasian 75:23
		150:11		

cause 1:1,17 64:11 157:1	72:9 155:3	146:18,21,23	coaching 80:14 80:19	62:23 63:4,7,9 64:1,22 76:1,4 78:4 79:8 102:8
caused 15:5 35:5 53:7 54:24 56:17 86:19 87:9,24	changes 159:5,6	cited 62:7	COBRA 100:18	complaints 40:11 62:25 63:15,16
causes 112:23	charge 5:9 59:16 61:3,12 82:7 90:18	cites 147:2	code 35:12,20 37:3,3,3,5,7,8 37:13,15,17,17 37:19,23 144:17 145:7	complete 15:5
center 25:16	charges 159:10	citizen 40:10 131:5,9	cold 132:21 136:21 137:7 138:6,17	completed 17:24
certain 23:18 95:5,24 130:24	Chavez 3:3	city 1:22 3:6 4:19,21 19:7 19:18,25 20:16 21:4,10 28:24 31:13,19 33:12 34:13,18,21 35:12 36:24 37:20 39:3,19 39:19 40:9,9 52:22 53:16,20 54:3,10 55:6,8	collect 53:1	completely 20:9
certainly 95:16 95:16	check 71:8 78:5 83:20 104:25 107:2	CJC 139:7	college 3:19 16:17 17:1	complex 117:23
certificate 18:6 18:6,11 159:13	checked 21:22 21:23 83:22	claim 25:15	Colunga 59:1 61:25 70:6 75:12,18 76:13	complied 106:3
Certificates 2:9	checking 78:2	claimed 85:20	come 12:2 84:24 102:17	compulsion 128:9
certification 3:19 94:24 96:8 157:8 158:3 159:1	chief 3:3 35:14 35:19 52:8,12 59:1,1 61:25 70:5 75:12,18 76:13	claims 25:6,10 30:14,15	command 79:22 71:14	computer 77:25 78:6,10,11,12 151:15
certified 1:19 37:15 95:22 157:11 158:4,6 159:16	chill 116:14 117:9,14	clarification 129:13	commentary 97:12	computerized 1:20
certify 157:12 158:1	choke 120:25 121:3,7,10,17 121:22 122:4	clarify 18:24	Commerce 6:21 9:5	computers 78:7
chain 79:22	Chris 2:14,16 10:1,1 44:2	classes 17:19 60:20	command 79:22 71:14	Concern 3:12
challenge 52:16 52:19 127:6,24 129:15	Christopher 1:8 1:11,14 2:4,21 2:23 3:2,5,8,10 3:13,14,16,20 3:21,23 4:3,5,9 4:11,13,15,17 4:19,21,24 5:3 5:7,8,10 7:10 7:16 8:4 10:12 11:10 155:2 156:2,6 157:7 157:9,13,25	clear 12:3 45:1 110:19 116:25	commentary 97:12	concerning 150:12
challenging 128:14	Chronic 139:18 146:7	clearer 137:1	Commerce 6:21 9:5	concluded 153:23
chance 35:24	Cibolo 4:3,5 21:10,16,23 22:5,14,22 23:3,9	clerk 15:16 159:15	commercial 25:19	conclusion 66:4
Chancery 6:3 10:4,7,9 44:24 45:2,13 50:7 50:14 127:7 128:16 129:18 129:25 140:2 142:19 143:9 144:23 146:2 146:11,15,18 147:5,16,19,24 148:9,16,25 149:5,10,13 150:8,17,21 151:8,12	Circuit 139:18 146:7	click 14:6 151:14	commission 19:13 52:25 131:2 156:20	condensed 153:20
change 52:6,14	circumstances 54:23	client 152:7	common 87:1	conduct 64:9 67:7,16 102:3 102:5
	citations 32:6	clock 78:10,11	communication 80:23	conducted 1:12 8:4 157:10
	cite 146:12,15	clocking 78:13	communicatio... 47:6	confer 41:10
		close 90:14 103:24 126:1	community 69:6	confidential 141:11
		closed 90:10	Comp 30:14	confirm 34:11 34:12,14 55:24 73:18
		closer 21:24 85:21	company 16:1 25:11 30:15	conflicts 52:15
		closest 84:10	compensation 53:2,18,19	confused 79:25
		closing 90:12	complained 63:1 63:2	confusion 53:8
		coached 82:2	complaint 2:24 61:2,16,17,20 62:10,12,14,18	connection 40:2 40:6
				conscious 115:22 123:2 123:23

consideration 99:14,23 156:15 considered 32:8 consist 58:5 59:8 constitutes 150:5 Constitution 47:25 48:1 49:7,8 50:3,4 constitutional 111:2 Construction 129:4 consultant 31:5 consulting 30:12 CONT'D 3:1 4:1 5:1 7:1 contact 57:15,19 57:25 85:9 107:19 contacted 80:8 104:24 contains 159:6 contents 129:21 continuation 100:16 continued 33:2 continuing 60:13 control 14:7 55:9 80:1 conversation 42:6 92:25 conversations 42:1 43:10 cooperative 109:14 cooperatively 106:17 copies 159:11 copy 13:23 14:11 99:1 153:7,7,8,17 153:19,20 159:13 corner 145:14	Corp 145:4 corporal 2:13,23 3:11 59:17,18 67:16 68:16,20 69:14 72:4,11 72:15,18 73:1 73:20 75:1,8 75:18 76:6 77:3,8 78:20 79:5 82:2,3,5 88:20 89:9,12 89:18 91:3,11 92:25 93:11 95:7 104:1,3,5 110:15 128:12 130:18 131:2 133:12 135:1,4 135:10,20 136:2,6,16 137:1,9,14,19 137:23 138:14 139:2,4,9 140:9,16,25 141:2,13,21 142:6,12,15,21 143:1,14,20,25 144:8 145:5,9 145:21 146:5 149:9 151:19 151:24 152:15 152:22 corporal's 136:7 corporals 59:15 correct 11:12,22 16:16 17:20 19:4 22:15 23:4,5 25:12 25:14 27:15,16 27:21 28:15 31:24,25 32:25 33:17,18,21 37:1 38:3,15 38:18,19 41:1 45:7 49:2,3,25 50:19 51:3,7 51:18,22,25 54:6,9 55:17	58:12,23 59:10 61:10,11 68:7 72:12,18 74:10 75:4 76:16,17 79:6 80:16 82:4 83:1 84:15 88:21 95:5 96:3 101:11,12 103:17 104:1 106:1,13 107:10 111:5 113:1 116:5 124:17 135:7 137:23,24 151:2 156:3 correction 2:8 155:1 156:3 correctly 76:22 143:1,6,8,11 143:13,16 144:9,19 145:9 cotton 137:10 Council 96:21 counsel 6:8 7:10 7:16 8:16,17 8:19 42:7,23 44:11,16 49:16 99:2 102:12 111:7 157:21 158:1 counsel's 44:20 44:23 counseling 70:7 75:19 Counselors 44:24 county 1:5,22 4:7,9,11,13,15 4:17 22:25 24:13,20,22 25:2,25 26:1,4 26:8,15 27:14 28:8,11 29:5,8 29:19,25 39:4 39:20 40:10 94:1 156:10	157:5 couple 14:17 16:23 40:4 59:6 77:17 78:23 139:17 course 17:24 92:17 95:13 96:13,16,17,20 97:2,4 100:24 111:8 court 1:2 4:21 8:10,11 10:8 12:2 28:25 32:7,12 44:6 129:3 139:21 147:4,9 157:2 157:16 158:13 159:22 courtesy 11:21 152:23 courts 31:24 33:3 covered 48:19 105:6 128:8 129:11 139:22 COVID-19 8:6 coworkers' 77:20 creates 112:23 cries 125:19 crime 131:2 criminal 14:10 14:14 15:18 109:4 Cruz 46:14 59:14,18 72:4 73:1,20 74:21 75:1,8,10 77:3 77:8 82:3 crying 86:12 CSR 8:11 158:11 159:21 Culebra 6:5 10:10 current 8:6 11:11 currently 11:13	58:1 Custodial 159:8 customarily 132:21 136:20 137:6 cut 145:2 cycle 23:19 <hr/> D <hr/> damage 86:17 danger 115:8,8 date 2:22 19:19 26:25 32:20 42:6 58:9 61:19 68:23,23 155:2 dated 24:13 30:1 96:11 dates 90:9 David 7:4,24 8:23,25 9:10 9:14 74:14,16 91:6 93:6 116:3 131:12 140:20 149:17 157:19,23 David's 105:19 david.jones@... 7:8 day 1:17 68:17 97:5 144:18 145:8 149:10 149:12 150:13 156:11,16 158:6 159:16 days 55:12 73:24 92:7,7 deadly 64:9 121:8,22,25 123:15 130:21 130:25 deal 153:11 dealt 16:4 death 112:23 115:8 117:16 121:12 122:16 123:1,19
--	---	--	--	--

deceased 57:20 57:22	79:17 92:8 93:20,24 94:5 94:13 103:16 114:2 115:4 117:11 126:12 126:15	80:19	1:8 157:2,7	103:15 104:7
December 14:15 15:18 22:18,22 24:13,20 29:6 40:19 41:20 47:21 51:2 62:6 99:15 100:19 101:10 102:4,14,25 103:1,11 144:18 145:8 152:5	departments 39:22,25 78:23	different 24:5 98:2	division 4:21 32:22 33:5 34:2 35:13,20 37:6	drop 32:17
decided 139:21	depo 36:7	difficult 78:5	divulge 42:5	dropped 109:7
decision 140:5 148:13	deposition 1:10 1:14 8:3,12 11:6 12:13 34:10 45:17,20 48:9,10 49:10 102:25 116:5 153:4,23 156:3 157:9,14,15,17 157:21 159:3,4 159:7,9,11,12	diminished 15:1	document 14:7 19:12,22 67:6 69:10 76:23 79:5 89:4,6 91:21 95:15,17 142:25 156:13	drove 104:15
decisions 45:4	depth 73:8	direct 68:6	documents 13:13 21:14,15 45:16,19,22 46:6,16,17,21 46:23 47:2,4,5 50:25 91:6,10	drugs 130:4
deemed 128:7 129:10	deputy 24:25 26:11 27:13 29:12 32:4 33:1	directed 79:6 139:25 147:14	doing 15:14 24:4 32:15 39:23 80:1 95:21 111:19 127:17	drunk 98:1
DEFENDANT 5:12 7:2,10,16 157:23,24	describe 79:24 133:9 135:5,9	director 37:7 74:4	door 84:12,17 85:4,11,15,16 86:23 88:18	Ds 14:22
defense 43:23 67:21	described 68:2 81:12 82:19	disabled 103:18 103:18 104:1,3	dorm 85:14	Dubuis 84:3,8
degree 14:9,14 15:17	description 2:10 3:1 4:1 5:1,12 149:6 156:13	disagree 69:17	dormitories 83:18	dude 111:16
DeHoyos 82:11 103:4 104:23 107:20 114:1 116:11	designation 32:20	disappeared 39:7,9	dormitory 84:9	duly 1:16 10:13 157:13
delivered 159:7 159:12	Desk 3:2	disaster 8:7	dozen 31:10	duty 103:4 138:17
demotions 40:16	detai 2:14	discharge 34:21 34:23,23 35:6 35:15 36:12 100:9 101:16	Dr 70:9 75:13,15	
deny 85:19	determination 146:7	discovery 149:15	drawn 74:21 75:2	E
department 3:17,22,24 4:3 4:5,11,23,25 5:3 18:10 21:16 23:17,23 23:24 27:2,9 27:12,19 33:16 39:4,20 45:25 51:6,13,17,21 52:4 59:24 63:14 64:8 66:23 75:23 76:5 79:9,14	determine 85:24 107:12,15 108:18 114:17	discarded 46:15 151:6	dress 137:6	E 6:1,1 7:1,1 156:19
	determined 113:20 139:14	discrimination 5:9	dressed 132:21 138:6,16	e-mail 2:16 6:12 6:18,23 7:8,15 7:20 61:25 62:5,6,7 76:25 78:22 147:7
	dialogue 106:25	discriminating 102:3,5	drive 96:22 117:20	earlier 29:9 34:10 51:1 69:9 116:3
	Diamond 15:13 15:14	discussed 75:17	drinking 16:11	early 46:12,19 50:25 61:2 65:9 103:8
	die 125:13	discussion 75:17	driver 104:14 105:1,3,13,21 105:25 106:3,6 106:8,10	earn 14:9,14 17:11
	difference 29:18	disfigurement 112:24	driver's 79:17 106:6	earned 17:18,19 17:21 18:12
		disposed 70:24	drivers 68:12	east 7:6 9:16 25:1,1
		disregard 115:22 123:2 123:24	driving 79:18	echo 94:11
		distinguishing 66:13		Ed 59:14,18
		DISTRICT 1:2		education 60:13
				educational 58:21 59:5
				Edward 46:14
				EE 101:25
				EEOC 101:25
				effect 113:17 118:22
				effective 3:4 100:19

efficiently 11:16	51:15 55:4,16	157:16	101:4,5,19,20	127:5 129:15
effort 60:22,23	55:25 69:24	exchanged	101:24 134:3	129:19 148:14
113:19,24	78:21 101:10	149:14	141:19 142:5	facts 115:22,23
efforts 107:15	128:10 138:3	excuse 16:10	145:18 151:7	123:2,23,24
egearhart@sh...	en- 37:17	executed 156:14	151:17,20	faded 103:22
7:15	encounter 106:7	exemplar 150:10	152:4	failed 107:10
eight 23:4 26:13	108:21 110:12	exhibit 2:10,11	exhibits 2:10 3:1	119:25 120:8
26:14 33:23	111:11 115:21	2:13,16,18,20	4:1 5:1,12	failure 119:19
34:19 44:7	116:9 118:15	2:22 3:1,2,5,7	133:22,24	fair 13:23 14:10
120:4 125:8	120:5,15,25	3:9,11,12,14	153:24 154:2	35:17 66:2
eight-hour 97:4	130:4	3:15,18,19,21	159:11	90:13 107:14
either 11:21	endeavors 62:17	3:23 4:1,2,4,6	exist 107:24	fairly 138:5,15
23:9 40:14	ended 21:3,3	4:8,10,12,14	exists 129:5	fall 14:24
64:4 69:11,23	enforcement	4:16,18,20,22	experience	false 74:21 75:2
75:12 82:1	16:25 17:3,9	4:24 5:1,2,4,6	20:13 80:16	familiar 22:11
108:17 144:14	18:23 19:1,2	5:8,9,12,13,14	Expiration	family 54:25
electronic 78:11	19:13 32:9	5:15,16,17,18	158:12 159:21	Fannin 6:10
153:16	35:12,20 37:3	5:19 13:15,20	Expires 156:20	8:21
eligible 35:2	37:3,6,7,8,9,13	17:7 18:2,5,21	explain 20:3,3	far 21:18 22:20
embraced	37:15,17,19,19	19:10 20:19,20	37:17 41:24	47:2 80:21
109:13	37:24	21:9,13,14	97:7 98:4	94:8,14 97:9
emergency 8:6	enforcing 80:2	23:7 24:12	explains 27:14	fashion 69:16
80:5,6,9	engaged 64:9	25:23,24 26:22	explanation	fast 11:15
104:19	entirely 124:16	26:23 27:1,17	81:1	father 125:23
Emily 7:12	entity 32:5 35:2	28:3,5,6,7,21	expressed	favorable 53:19
13:12 153:9	equipped 103:16	29:3,4,23,24	156:15	fear 131:10
emotional 12:17	Eric 52:21	31:3,10,12	extent 43:6	feedback 30:23
12:21	ESTATE 1:4	32:18,18,21	44:10 107:15	77:4
employed 11:13	157:3	33:8 34:5,6,7		feel 10:19 19:21
29:14 39:3,19	evening 132:22	34:11,16 35:10	F	22:15
53:24 54:2	133:4	36:15,18 37:11	F 7:5 14:24	felt 110:2
55:6,17 59:9	event 15:4,9	38:4,6 48:9	F-5 3:5,15 4:4,8	festivals 26:16
60:1 66:8	66:16 149:19	55:18,21,24	4:12,16 5:2	few-minute
77:10 78:23	events 12:15,16	56:16 59:19,22	20:20 22:11,14	152:14
86:22 90:16	12:19,21 26:16	59:22 60:7	25:25 28:7	field 5:8 15:19
94:4 101:13	47:21 92:10	61:22,22 63:11	29:25 32:21	83:16 85:21
158:1	102:13 152:5	66:25 67:5	34:12,25 38:6	96:8,8,13
employee 46:8	eventually 54:7	68:2 70:4 71:5	47:1 101:5	97:21 98:3
74:2,5 80:22	everybody 88:11	71:24 72:7	F-5s 45:24	100:23 107:11
98:24 128:11	134:4	73:12 76:7,8	F5 4:20	fifth 13:14 45:5
137:21	evidence 124:5	79:1,2,5 81:5,6	fabricate 124:5	47:24 48:6
employment	132:1	81:13 82:19	face 125:5	49:6,12 50:2
11:12 20:16,16	exactly 15:11	89:14,16 90:22	Facsimile 6:6,12	50:16 91:21
25:4 28:10	16:20 45:23	90:24 93:2,4	6:17,22 7:14	101:22 102:2,6
34:18,19 35:3	examination 2:5	94:17,19,23	7:20 158:15	102:10 103:9
35:5 38:12,16	2:6,7 10:14	95:20 96:4,6	159:24	104:13,18,22
46:25 50:24	130:16 152:2	98:15,16,19,21	fact 108:16	105:2,12,24

106:2,5,9,15	46:3 49:21	first 10:13 11:18	67:10 69:7,18	frustrated 72:20
106:20,24	61:19 64:2	17:5 18:22,25	70:2 73:17	72:23
107:3,6,9,13	71:10 80:23	18:25 19:5	86:25 87:7	Fs 14:22
107:18,22	95:10	27:19 48:23	88:4,12 105:9	full-time 15:7
108:1,6,10,15	filed 11:2 39:24	56:25 59:11	105:16 106:14	20:6 22:3 25:3
108:20,24	40:11 42:21,24	61:3,3,24	106:19 108:5,9	27:13,19 32:14
109:2,5,11,18	43:1,7 46:7,12	67:19 68:25	108:14 109:10	33:11,15,19
109:22 110:1,4	47:14 52:21	69:9 81:21	109:17,21	37:6 38:1
110:7,10,18,20	53:4,20 56:1	85:9,12 94:3	110:15 111:4	51:23 53:24
110:25 111:13	56:12 61:16	105:25 106:10	111:24 112:4	54:7,11 93:16
111:17,20,25	63:25 72:4,25	106:16 110:12	112:11,18	fuller 10:17
112:5,13,20	73:24 77:3,12	120:5,15 123:7	113:8,22 114:4	further 2:7
113:2,14,18,23	77:18,21	130:8 132:1,16	114:10,14,19	88:16 89:21
114:6,11,15,20	101:24 102:8	138:22 141:6	114:24 115:10	98:4 140:17
114:25 115:6	159:14	fishbowl 78:8	115:14,18,25	152:2,24 158:1
115:11,15,19	files 21:15 46:1	five 32:24 36:3	116:12,19,23	158:2,3 159:1
116:1,13,16,20	filing 61:2 77:14	106:10 123:7	117:2,6,12,18	
116:24 117:3,7	fill 20:6,8	123:11	118:1,6,12	G
117:13,19,22	filled 58:11	fled 114:12	119:6,11,17,22	gain 20:13
118:2,7,10,13	financial 53:19	flight 108:4	120:2,11,22	game 86:7
118:17,20,23	financially 158:2	flow 35:25	121:7,14,19,22	garage 82:21
119:2,7,12,15	find 57:9 114:18	flown 30:15	122:1,7,12,18	86:19,21
119:18,23	finding 53:19	follow 11:15	122:22 123:4	garb 132:21
120:3,7,12,17	63:6	73:6 119:20,25	123:12,20	Garrity 128:8,8
120:23 121:2,6	fine 9:24 38:10	134:2	124:1,13,18,22	Garza 129:3
121:9,15,20	41:11 45:9,10	followed 79:16	125:2 131:11	gas 15:13
122:2,8,13,19	50:6 67:24	following 117:21	132:24 133:7	gather 83:7
122:23 123:5,9	71:16 106:12	129:22 157:12	143:15 144:20	gaze 98:8,9,12
123:13,16,21	106:12,12,13	157:21	145:10	Gearhart 7:12
124:2,7,10,14	111:16 132:17	follows 10:13	formal 23:16,16	13:12
124:19,23	134:5 148:6	157:17	23:19 63:3,6	general 15:16
125:3,6,9,12	fingerprints	foot 98:7	63:14	34:21,23 35:6
125:15,18,20	124:9	football 83:14	former 35:14	35:15 36:12
125:22,24	finish 11:19 36:6	85:21	forms 22:11	47:6,6 62:14
126:13,17	65:18,19 72:1	force 109:15	forward 110:24	64:25 78:22
127:1,6 128:14	93:5	112:10 113:15	found 84:1	99:2 131:13
128:23 129:11	finished 19:1	118:22 121:8	four 97:18,18	generally 76:18
129:20 130:6,9	81:9	121:22,25	frame 85:16	generic 92:23
130:11,13	fire 95:10,13	123:15	freaking 109:24	geography
133:2 139:14	firearms 23:13	Ford 104:10,14	free 10:19 19:21	21:22
139:18,20,22	24:7 92:11	104:20,24	22:15 128:6	George 4:25 5:3
146:7,8 150:6	fired 52:12	105:3,14,22	freed 121:16,21	35:12,20 36:19
150:25 152:8,9	125:7	foregoing 156:2	122:3	36:23 38:7,13
fifty-fifty 37:25	firing 95:4	156:14	frisking 106:25	38:16 39:3,19
fight 48:18	firm 6:15,20	forgetting 98:8	107:4	40:9 56:20
file 2:13 13:21	30:13 158:12	form 13:2,6 35:8	front 13:13	getting 18:12
18:10 39:4,21	159:22	60:15 64:19	82:24	95:22 104:6

110:3 139:23 Gilbert 57:24 139:21 146:23 146:24 147:3 150:11 give 12:3 53:15 56:4 80:25 100:8 104:23 105:18 108:18 114:22 132:11 134:7 146:11 146:15,21,23 149:6 given 22:6 45:15 47:17 58:18,24 59:3,6 75:1 79:9 95:1 108:12 109:12 127:25 128:9 129:1,16,19 130:1 131:6 152:24 156:15 157:14,20 giving 128:4 142:13 gklein@herri... 6:18 glad 95:18,18 glass 65:8 78:9 go 8:24,25 9:3 9:23,23 10:4 11:15,15 14:19 17:10 27:1 35:25 38:17 39:11,12 41:10 42:16 62:3 64:14,15,19 65:20 85:3,14 86:23 87:6,22 89:15,15 91:19 91:20,23,23,25 100:22 102:12 102:17 105:19 110:24 126:18 129:8 135:24 135:25 138:9 138:11,12,21	140:13,24 141:16,17 142:1,10 143:18,22 144:5 146:19 148:17 151:5 151:13 goes 71:7,11 126:23 135:14 going 9:21 11:18 12:16,18 13:1 15:8 25:4 40:21 41:23 43:4 44:17,19 44:22 47:23 48:11,14,16 49:22 50:24,25 56:19 59:21 61:4 64:18 79:21 88:3,13 89:3 90:7 99:5 105:20 119:8 125:25 127:3 127:23 135:24 136:14 138:10 139:11 145:20 149:21,22,24 150:1 151:6 152:6,6 Gomez 92:25 95:8 good 10:24 12:5 21:5 28:14 40:3 71:13 82:23 Gostomski 7:17 7:18 9:7,7,11 9:11 10:21,24 12:25 13:11 48:19,22,22 67:10,12,12 95:14 99:5,8 99:11,17 Government 144:17 145:7 governmental 35:2	Governments 96:21 grades 15:1 graduate 17:3 graduated 15:17 Gramm 6:15 grant 37:5,25,25 57:4 grant-funded 56:19 grasp 122:10 grateful 102:15 great 29:22 greater 109:15 Green 82:17 grievance 2:17 46:9 53:6 63:25 72:3,25 73:6,20,24 74:9 77:2,7 78:16 81:24 82:3 101:24 102:8 grievances 39:4 39:21,24 46:7 46:11 47:13 52:22,23 53:4 53:20 64:2,5 66:21 77:11,17 77:21,22 grip 121:3 groggy 86:10 ground 112:2 118:5 GROUP 6:4 Grove 51:5,13 51:17 guess 24:1 47:5 47:6,7 52:14 52:15 79:25 147:14 150:20 guidance 150:7 gun 74:22 75:2,4 119:14 guys 105:19 Guzman 72:18 78:20 82:5,5	89:12,19 90:15 <hr/> H <hr/> half 30:6 31:10 54:12 92:7 half-time 37:23 37:24 Hall 53:16 65:9 Hallandale 129:4 hand 112:1 156:15 handcuffs 107:17 108:12 109:7 112:2 118:4 119:14 handle 24:6 63:17 handling 23:13 handwriting 144:2 Handwritten 2:18 Hang 132:8 hanging 137:18 137:19 happened 77:22 124:12 hard 84:20 he/she 156:14 head 12:1 health 37:20 hear 24:18 85:11 87:10,18 88:6 105:17 125:19 140:21 151:9 151:10 heard 65:11 74:18 149:14 Hearsay 87:7 HECKER 7:18 Heights 107:24 114:2 117:11 126:11,15 help 116:22 helps 40:6 hereto 1:24	154:3 Herrera 6:20,20 9:3,4 24:16 Herring 6:14,15 9:1,8,8 28:4 hey 106:12,12 106:12 high 16:17 68:4 68:7 69:12 high-school 2:14 higher 79:14 highway 68:9 Hildebrand 79:16 hill 83:17 hire 22:3,4 hired 15:23 37:6 52:13 58:11,12 58:19 59:1,3 61:4,6,12,16 hiring 18:16 hit 82:20 83:4 85:17 hitting 95:23,24 hold 41:8 48:2 48:24 61:22 120:25 121:3,4 121:7,10,17,22 122:4 139:10 Holder 3:23 holster 64:11 118:9 home 10:9 105:15,23 117:20 honestly 75:9 77:20 87:1 100:2 honorable 34:23 35:6 100:9 101:16 honorably 22:19 28:13 horizontal 98:12 Host 7:22 hour 87:3 104:17
---	--	---	--	--

hours 23:20 26:10,14 37:8 37:8 51:10 97:18,19 157:18,19,19	impaired 119:1 impairment 112:25 119:4 imperfect 49:23 implicate 128:14 in- 25:11 in-house 25:10 60:18 in-person 96:17 Incarnate 1:7 3:7,9,16 5:6 7:3 9:19 11:3 36:11 38:17 40:20 41:22 43:3 44:9 46:1 46:4 47:19 56:1 66:9 67:17 68:7 69:12 92:3 100:25 101:25 132:22 157:6 157:24	informed 66:3,6 78:22 83:10 84:4 148:13 initials 139:5,7 139:15 140:1,4 140:10,11 141:1,1,3,5,7 141:13,20,21 141:23 142:5,8 145:13,13,15 initiate 23:24 60:23,23 injuries 130:25 injury 30:15 64:12 112:17 112:22,22 113:5 115:9 117:16 121:12 122:16 123:1 123:19 inside 65:7 insignia 136:8 138:1 insist 86:18 insofar 42:5 instance 1:15 69:10 institution 58:22 59:5 instruct 44:18 98:10 99:8 instructing 13:7 42:2,4 43:5,24 instruction 97:18,20 instructor 97:12 instrument 156:14 insurance 25:8 25:11 27:25 28:1 100:16 intended 110:23 intensity 12:21 Inter-Office 62:4 interested 158:2 interim 22:4	internal 3:11 66:10,13 76:22 92:8 International 15:22,24 30:13 Internet 39:6 interrupt 8:24 36:5 44:25 89:3 116:5 133:18 147:6 147:10,23 interrupted 64:14 interview 41:1,5 41:7 58:2,5,7 58:15,20 73:15 73:23 74:25 91:13 interviewed 40:19,23 41:21 58:9 73:9,20 interviews 43:2 58:25 74:6,8 intoxicated 85:23,25 107:12 intoxication 107:16 introduce 10:5 56:4 introduced 150:14 invade 128:21 128:22 129:9 invest- 31:5 investigate 87:2 87:4 investigated 65:3,4 66:7 investigation 46:18 64:8,16 65:22,23 66:5 66:11,14,15,23 73:6 77:12 88:16 investigations 30:16 47:13	investigative 30:14 investigator 30:12 31:6 invokes 41:25 involve 96:2,23 96:23 100:5,8 100:11 involved 30:21 42:10 70:12,22 83:4 96:24 97:8,9,13,24 100:6 involvement 43:8 45:1 involves 30:24 95:4 involving 37:21 Ismael 82:12 issue 49:20 150:9,12,14 issues 75:14,20 It'll 40:5 151:14
I	inci- 64:10 incidences 64:10 incident 5:4 68:1,3 81:4,12 82:18 131:15 150:13 incidents 64:10 include 43:9 includes 157:21 incoherent 86:2 incorrect 70:23 incriminatory 129:7,7,11 INDEX 2:1 indicates 143:12 individual 131:9 INDIVIDUAL... 1:2,3 157:2,3 inflict 130:21,25 influence 130:4 information 5:6 26:25 31:15 36:18 120:19 134:8,10 157:20	imminent 64:12	J	
hours 23:20 26:10,14 37:8 37:8 51:10 97:18,19 157:18,19,19	impaired 119:1 impairment 112:25 119:4 imperfect 49:23 implicate 128:14 in- 25:11 in-house 25:10 60:18 in-person 96:17 Incarnate 1:7 3:7,9,16 5:6 7:3 9:19 11:3 36:11 38:17 40:20 41:22 43:3 44:9 46:1 46:4 47:19 56:1 66:9 67:17 68:7 69:12 92:3 100:25 101:25 132:22 157:6 157:24	informed 66:3,6 78:22 83:10 84:4 148:13 initials 139:5,7 139:15 140:1,4 140:10,11 141:1,1,3,5,7 141:13,20,21 141:23 142:5,8 145:13,13,15 initiate 23:24 60:23,23 injuries 130:25 injury 30:15 64:12 112:17 112:22,22 113:5 115:9 117:16 121:12 122:16 123:1 123:19 inside 65:7 insignia 136:8 138:1 insist 86:18 insofar 42:5 instance 1:15 69:10 institution 58:22 59:5 instruct 44:18 98:10 99:8 instructing 13:7 42:2,4 43:5,24 instruction 97:18,20 instructor 97:12 instrument 156:14 insurance 25:8 25:11 27:25 28:1 100:16 intended 110:23 intensity 12:21 Inter-Office 62:4 interested 158:2 interim 22:4	internal 3:11 66:10,13 76:22 92:8 International 15:22,24 30:13 Internet 39:6 interrupt 8:24 36:5 44:25 89:3 116:5 133:18 147:6 147:10,23 interrupted 64:14 interview 41:1,5 41:7 58:2,5,7 58:15,20 73:15 73:23 74:25 91:13 interviewed 40:19,23 41:21 58:9 73:9,20 interviews 43:2 58:25 74:6,8 intoxicated 85:23,25 107:12 intoxication 107:16 introduce 10:5 56:4 introduced 150:14 invade 128:21 128:22 129:9 invest- 31:5 investigate 87:2 87:4 investigated 65:3,4 66:7 investigation 46:18 64:8,16 65:22,23 66:5 66:11,14,15,23 73:6 77:12 88:16 investigations 30:16 47:13	investigative 30:14 investigator 30:12 31:6 invokes 41:25 involve 96:2,23 96:23 100:5,8 100:11 involved 30:21 42:10 70:12,22 83:4 96:24 97:8,9,13,24 100:6 involvement 43:8 45:1 involves 30:24 95:4 involving 37:21 Ismael 82:12 issue 49:20 150:9,12,14 issues 75:14,20 It'll 40:5 151:14
hours 23:20 26:10,14 37:8 37:8 51:10 97:18,19 157:18,19,19	impaired 119:1 impairment 112:25 119:4 imperfect 49:23 implicate 128:14 in- 25:11 in-house 25:10 60:18 in-person 96:17 Incarnate 1:7 3:7,9,16 5:6 7:3 9:19 11:3 36:11 38:17 40:20 41:22 43:3 44:9 46:1 46:4 47:19 56:1 66:9 67:17 68:7 69:12 92:3 100:25 101:25 132:22 157:6 157:24	informed 66:3,6 78:22 83:10 84:4 148:13 initials 139:5,7 139:15 140:1,4 140:10,11 141:1,1,3,5,7 141:13,20,21 141:23 142:5,8 145:13,13,15 initiate 23:24 60:23,23 injuries 130:25 injury 30:15 64:12 112:17 112:22,22 113:5 115:9 117:16 121:12 122:16 123:1 123:19 inside 65:7 insignia 136:8 138:1 insist 86:18 insofar 42:5 instance 1:15 69:10 institution 58:22 59:5 instruct 44:18 98:10 99:8 instructing 13:7 42:2,4 43:5,24 instruction 97:18,20 instructor 97:12 instrument 156:14 insurance 25:8 25:11 27:25 28:1 100:16 intended 110:23 intensity 12:21 Inter-Office 62:4 interested 158:2 interim 22:4	internal 3:11 66:10,13 76:22 92:8 International 15:22,24 30:13 Internet 39:6 interrupt 8:24 36:5 44:25 89:3 116:5 133:18 147:6 147:10,23 interrupted 64:14 interview 41:1,5 41:7 58:2,5,7 58:15,20 73:15 73:23 74:25 91:13 interviewed 40:19,23 41:21 58:9 73:9,20 interviews 43:2 58:25 74:6,8 intoxicated 85:23,25 107:12 intoxication 107:16 introduce 10:5 56:4 introduced 150:14 invade 128:21 128:22 129:9 invest- 31:5 investigate 87:2 87:4 investigated 65:3,4 66:7 investigation 46:18 64:8,16 65:22,23 66:5 66:11,14,15,23 73:6 77:12 88:16 investigations 30:16 47:13	investigative 30:14 investigator 30:12 31:6 invokes 41:25 involve 96:2,23 96:23 100:5,8 100:11 involved 30:21 42:10 70:12,22 83:4 96:24 97:8,9,13,24 100:6 involvement 43:8 45:1 involves 30:24 95:4 involving 37:21 Ismael 82:12 issue 49:20 150:9,12,14 issues 75:14,20 It'll 40:5 151:14
hours 23:20 26:10,14 37:8 37:8 51:10 97:18,19 157:18,19,19	impaired 119:1 impairment 112:25 119:4 imperfect 49:23 implicate 128:14 in- 25:11 in-house 25:10 60:18 in-person 96:17 Incarnate 1:7 3:7,9,16 5:6 7:3 9:19 11:3 36:11 38:17 40:20 41:22 43:3 44:9 46:1 46:4 47:19 56:1 66:9 67:17 68:7 69:12 92:3 100:25 101:25 132:22 157:6 157:24	informed 66:3,6 78:22 83:10 84:4 148:13 initials 139:5,7 139:15 140:1,4 140:10,11 141:1,1,3,5,7 141:13,20,21 141:23 142:5,8 145:13,13,15 initiate 23:24 60:23,23 injuries 130:25 injury 30:15 64:12 112:17 112:22,22 113:5 115:9 117:16 121:12 122:16 123:1 123:19 inside 65:7 insignia 136:8 138:1 insist 86:18 insofar 42:5 instance 1:15 69:10 institution 58:22 59:5 instruct 44:18 98:10 99:8 instructing 13:7 42:2,4 43:5,24 instruction 97:18,20 instructor 97:12 instrument 156:14 insurance 25:8 25:11 27:25 28:1 100:16 intended 110:23 intensity 12:21 Inter-Office 62:4 interested 158:2 interim 22:4	internal 3:11 66:10,13 76:22 92:8 International 15:22,24 30:13 Internet 39:6 interrupt 8:24 36:5 44:25 89:3 116:5 133:18 147:6 147:10,23 interrupted 64:14 interview 41:1,5 41:7 58:2,5,7 58:15,20 73:15 73:23 74:25 91:13 interviewed 40:19,23 41:21 58:9 73:9,20 interviews 43:2 58:25 74:6,8 intoxicated 85:23,25 107:12 intoxication 107:16 introduce 10:5 56:4 introduced 150:14 invade 128:21 128:22 129:9 invest- 31:5 investigate 87:2 87:4 investigated 65:3,4 66:7 investigation 46:18 64:8,16 65:22,23 66:5 66:11,14,15,23 73:6 77:12 88:16 investigations 30:16 47:13	investigative 30:14 investigator 30:12 31:6 invokes 41:25 involve 96:2,23 96:23 100:5,8 100:11 involved 30:21 42:10 70:12,22 83:4 96:24 97:8,9,13,24 100:6 involvement 43:8 45:1 involves 30:24 95:4 involving 37:21 Ismael 82:12 issue 49:20 150:9,12,14 issues 75:14,20 It'll 40:5 151:14
hours 23:20 26:10,14 37:8 37:8 51:10 97:18,19 157:18,19,19	impaired 119:1 impairment 112:25 119:4 imperfect 49:23 implicate 128:14 in- 25:11 in-house 25:10 60:18 in-person 96:17 Incarnate 1:7 3:7,9,16 5:6 7:3 9:19 11:3 36:11 38:17 40:20 41:22 43:3 44:9 46:1 46:4 47:19 56:1 66:9 67:17 68:7 69:12 92:3 100:25 101:25 132:22 157:6 157:24	informed 66:3,6 78:22 83:10 84:4 148:13 initials 139:5,7 139:15 140:1,4 140:10,11 141:1,1,3,5,7 141:13,20,21 141:23 142:5,8 145:13,13,15 initiate 23:24 60:23,23 injuries 130:25 injury 30:15 64:12 112:17 112:22,22 113:5 115:9 117:16 121:12 122:16 123:1 123:19 inside 65:7 insignia 136:8 138:1 insist 86:18 insofar 42:5 instance 1:15 69:10 institution 58:22 59:5 instruct 44:18 98:10 99:8 instructing 13:7 42:2,4 43:5,24 instruction 97:18,20 instructor 97:12 instrument 156:14 insurance 25:8 25:11 27:25 28:1 100:16 intended 110:23 intensity 12:21 Inter-Office 62:4 interested 158:2 interim 22:4	internal 3:11 66:10,13 76:22 92:8 International 15:22,24 30:13 Internet 39:6 interrupt 8:24 36:5 44:25 89:3 116:5 133:18 147:6 147:10,23 interrupted 64:14 interview 41:1,5 41:7 58:2,5,7 58:15,20 73:15 73:23 74:25 91:13 interviewed 40:19,23 41:21 58:9 73:9,20 interviews 43:2 58:25 74:6,8 intoxicated 85:23,25 107:12 intoxication 107:16 introduce 10:5 56:4 introduced 150:14 invade 128:21 128:22 129:9 invest- 31:5 investigate 87:2 87:4 investigated 65:3,4 66:7 investigation 46:18 64:8,16 65:22,23 66:5 66:11,14,15,23 73:6 77:12 88:16 investigations 30:16 47:13	investigative 30:14 investigator 30:12 31:6 invokes 41:25 involve 96:2,23 96:23 100:5,8 100:11 involved 30:21 42:10 70:12,22 83:4 96:24 97:8,9,13,24 100:6 involvement 43:8 45:1 involves 30:24 95:4 involving 37:21 Ismael 82:12 issue 49:20 150:9,12,14 issues 75:14,20 It'll 40:5 151:14
hours 23:20 26:10,14 37:8 37:8 51:10 97:18,19 157:18,19,19	impaired 119:1 impairment 112:25 119:4 imperfect 49:23 implicate 128:14 in- 25:11 in-house 25:10 60:18 in-person 96:17 Incarnate 1:7 3:7,9,16 5:6 7:3 9:19 11:3 36:11 38:17 40:20 41:22 43:3 44:9 46:1 46:4 47:19 56:1 66:9 67:17 68:7 69:12 92:3 100:25 101:25 132:22 157:6 157:24	informed 66:3,6 78:22 83:10 84:4 148:13 initials 139:5,7 139:15 140:1,4 140:10,11 141:1,1,3,5,7 141:13,20,21 141:23 142:5,8 145:13,13,15 initiate 23:24 60:23,23 injuries 130:25 injury 30:15 64:12 112:17 112:22,22 113:5 115:9 117:16 121:12 122:16 123:1 123:19 inside 65:7 insignia 136:8 138:1 insist 86:18 insofar 42:5 instance 1:15 69:10 institution 58:22 59:5 instruct 44:18 98:10 99:8 instructing 13:7 42:2,4 43:5,24 instruction 97:18,20 instructor 97:12 instrument 156:14 insurance 25:8 25:11 27:25 28:1 100:16 intended 110:23 intensity 12:21 Inter-Office 62:4 interested 158:2 interim 22:4	internal 3:11 66:10,13 76:22 92:8 International 15:22,24 30:13 Internet 39:6 interrupt 8:24 36:5 44:25 89:3 116:5 133:18 147:6 147:10,23 interrupted 64:14 interview 41:1,5 41:7 58:2,5,7 58:15,20 73:15 73:23 74:25 91:13 interviewed 40:19,23 41:21 58:9 73:9,20 interviews 43:2 58:25 74:6,8 intoxicated 85:23,25 107:12 intoxication 107:16 introduce 10:5 56:4 introduced 150:14 invade 128:21 128:22 129:9 invest- 31:5 investigate 87:2 87:4 investigated 65:3,4 66:7 investigation 46:18 64:8,16 65:22,23 66:5 66:11,14,15,23 73:6 77:12 88:16 investigations 30:16 47:13	investigative 30:14 investigator 30:12 31:6 invokes 41:25 involve 96:2,23 96:23 100:5,8 100:11 involved 30:21 42:10 70:12,22 83:4 96:24 97:8,9,13,24 100:6 involvement 43:8 45:1 involves 30:24 95:4 involving 37:21 Ismael 82:12 issue 49:20 150:9,12,14 issues 75:14,20 It'll 40:5 151:14

jherrera@her... 6:23	118:1,6,12 119:6,11,17,22	JUDICIAL 1:8 157:7	52:14 58:10,10 62:24 63:1,2,3	107:4,7
job 15:18,21 18:22,25 19:2 19:5,25 20:12 21:20 24:22 30:20,21 32:9 32:14 51:5 55:11,13 57:10 57:11 58:3 59:4 68:5 89:20 128:14	120:2,11,21 121:14,19 122:1,7,12,18 122:22 123:4 123:12,20 124:1,13,18,22 125:2 126:23 127:3,13,20,23 129:14,23 130:17 131:14 131:17,20,23 132:3,10,13,15 132:16,19,20 133:3,9,16,20 133:23,25 134:6,9,12,17 135:1,18,20,24 136:2,5,14,16 136:24,25 138:9,14,20,25 139:2,3,4,12 139:16 140:7 140:13,15,17 140:22,25 141:16,19 142:1,3,10,12 142:21 143:4,7 143:12,17,18 143:20,22,25 144:5,7,12,15 145:1,4,12,17 145:19,23 146:1,4,13,17 146:19 147:15 148:14,19 149:1,3,8,12 149:18,22 150:1,16,19 151:4,11,19,23 152:13,22 153:18,19 157:19,23	Julia 84:12 85:3 88:18 July 92:3 jump 67:22 June 26:1 27:9 30:1,2 junk 37:22 justice 14:10,15 15:18	64:2 69:22,24 72:1 73:7,7 76:20 77:17,21 78:24 84:25 91:15,17 93:4 94:9,14,15 106:11,22 118:21 124:15 128:23 129:6 134:9 147:25 150:3,6	leather 135:12 leave 22:22 28:23 30:9,9 35:5 52:4 103:7 leaving 78:20 lectures 96:23 led 88:17 99:3 Lee 57:15,16 left 21:6 27:14 28:8,10,19,22 29:8 30:20 32:24 33:4,6 33:11 36:24 38:12,16 51:17 82:6 89:12 101:17 103:12 103:15,21 105:4 137:25 140:25 141:20 143:12 145:14 151:14
jobs 25:5 Joeris 84:2,8,9 84:12,24 Join 67:14 88:5 joint 43:23 joint-counselor 45:6 Jones 2:6 7:4,24 8:23,23 9:1,10 9:10,14,15 35:23 36:4 45:10 50:10,12 56:3,7,9 60:15 67:14,20,25 68:13 69:7,18 70:2 71:13,17 73:17 74:12,15 74:17 86:25 87:7,10,14 88:5,12 89:22 89:25 91:8 93:8 102:15,18 105:7,9,16 106:14,19 108:5,9,14 109:10,17,21 110:15 111:4 111:24 112:4 112:11,18 113:7,22 114:4 114:10,14,19 114:24 115:10 115:14,18,25 116:12,19,23 117:2,6,12,18	Jorge 6:20 9:3,4 Jr 3:14 Judge 129:2,17	<hr/> K <hr/> Kayla 7:23 14:19 18:2 19:10 59:19 61:22 71:23 91:20 keep 12:18 48:14,16 89:3 Keith 128:4 144:10,16 145:5 kill 70:12 killed 123:8 kind 17:15 26:16 84:20 129:21 133:12 150:15 kiosk 64:23 Klein 6:15 knees 124:25 knew 113:5 115:1 117:23 119:16,19,24 121:7 122:21 123:10,14 knock 85:4 knocked 84:12 84:17 knocking 86:23 88:18 knocks 85:12 know 12:9,20,21 16:24 35:16,19 41:9 47:15 49:19 50:17	known 119:20 119:25 156:12 Kurth 7:4 <hr/> L <hr/> L 25:24 L-1 3:21 4:7,10 4:15,18,23,24 L-180 4:2 L1 22:11 24:12 27:2 29:4 36:19 45:23 46:25 largely 59:8 larger 22:23 Larry 74:12,19 late 64:24,24,24 Laurence 7:4 laurence.kurt... 7:8 law 6:15,20 9:12 16:25 17:3,9 18:23 19:1,2 19:13 32:8 129:2 lawful 131:5 lawsuit 11:2,6 42:22,23 43:1 43:7 44:6 lawyer 37:3 99:2 126:10 127:10 learn 76:24 77:2 77:6,6 78:19 learned 84:7	left 21:6 27:14 28:8,10,19,22 29:8 30:20 32:24 33:4,6 33:11 36:24 38:12,16 51:17 82:6 89:12 101:17 103:12 103:15,21 105:4 137:25 140:25 141:20 143:12 145:14 151:14 legal 6:4 131:23 LEMVI 5:8 let's 23:6 28:2,2 29:2,3 31:9,9 33:7,7 36:9 38:20,20 39:11 39:12 102:16 110:19 134:6 134:17 135:25 138:12,22 141:16 142:1 142:10 143:22 146:19 148:17 letter 2:20 3:12 3:14 76:12 98:23 license 3:5,21,23 4:4,9,13,17,20 17:12,20,21,23 18:13 19:17 60:14 83:20,20 104:23 106:7 licensed 30:11 Licensee 3:15

4:6,14,22,24 5:2 life 64:12 131:10 lights 80:6 104:19 limit 45:8 80:12 129:15 limited 45:3,4 50:7 line 57:1 78:6 89:4 141:11 155:3 liner 135:13,14 lines 49:12 111:15 149:8 listed 57:14,18 57:24 listen 145:20 151:20 litigation 13:22 59:25 little 23:3 30:23 66:9 77:4 81:9 89:20,21 98:4 127:10 136:25 139:1 140:17 140:22 lived 84:2,2,8 114:18 117:24 LLP 6:4,10 7:6 loading 151:11 local 115:4 locate 84:5 located 8:8 9:12 83:11 location 107:21 107:25 113:20 120:14 locations 8:18 40:17 long 16:18 25:20 31:4 32:11,11 33:22 49:17 54:10 55:10,10 64:6 97:2,2 137:11 148:4 148:16 150:12	150:19,21 long-sleeve 136:12,18 137:10,10 long-term 112:25 longer 69:2 78:23 82:1 90:15 108:25 look 111:15 125:4 looked 73:7 83:3 138:15 looking 57:6 83:2,8 looks 92:7 95:10 Loop 6:16 7:18 loss 112:24,25 128:9 lost 39:10 42:15 lot 83:12,13 105:5 117:24 lower 145:13 Luis 3:14 lunch 103:12 104:6	map 21:23 March 20:22 21:5 52:5 53:23 56:1 102:4 Marion 3:22,24 19:7,18,25 20:17,21 21:4 21:24 23:2,10 65:9 mark 13:17 133:21 134:3,6 135:25 136:5 137:1 138:22 145:20 151:6 marked 34:9 131:25 136:15 142:4 marking 133:22 133:24 marks 83:9 marshal 4:19,21 31:14,20,22 32:6,22 33:4 marshal's 32:4 33:1 Mary 7:24 131:23 132:1 132:17 135:19 138:11,13,20 139:1,3 140:14 140:18,23 141:17 142:2 142:11 143:19 143:22,24 144:13 145:17 145:23 151:5 151:13 Mason 6:14 9:8 master 6:3 10:4 10:7,8 44:24 45:2,13,14 50:7,14 127:4 127:7,24 128:16 129:14 129:18,24,25 139:11,17	140:2,8 142:17 142:19 143:2,9 144:21,23 145:2,25 146:2 146:11,15,18 146:23 147:1,5 147:14,16,19 147:22,24 148:9,15,16,25 149:4,5,10,13 150:3,8,16,17 150:19,21 151:4,8,12 match 104:15 Mathew 9:17 Mathis 3:6 4:23 33:12,16,19,22 33:24 34:13,19 34:22 36:24 39:3,19 40:10 51:20 52:4 53:21,23 93:23 matter 127:5 147:10 150:20 Matthew 7:5 matthew.wym... 7:9 mayor 35:13 mean 36:1,4 49:18 77:22 100:17 150:4 meaning 42:12 means 8:13 76:18 80:1 111:1,8 112:22 meant 31:23 65:24 meet 12:24 meeting 58:25 meetings 43:2 member 112:25 Memo 2:13 Mercury 25:8 25:20 27:25 28:1 merely 129:1,5 met 43:18,20	44:8,11,14 mherring@he... 6:18 Mickey 11:2 mid-to-late 88:25 midnight 84:11 miles 104:16 Miller's 65:1,2 million 74:13 mind 13:18 minimum 26:13 minor 37:21 minute 120:15 minutes 36:3 108:21 110:12 111:11 115:20 116:8 118:14 120:4,20,24 123:6 157:18 157:19,19 mission 67:17 mistake 11:22 moment 18:3 55:19 59:20 71:6 money 100:5 Monica 1:18 8:10 9:22 10:5 48:23 87:11 124:3 127:16 127:21 153:3 157:11 158:11 159:21 month 16:21 26:10,17,17,19 months 16:22 17:16 23:3,4 26:5 28:17 29:9,9,18 30:6 31:7,8 32:13 32:24 33:23 34:19 38:13 44:7 51:18 52:2,3 61:15 63:22 100:3 101:14
---	---	---	--	---

Morales 7:24 131:23 132:2,4 132:8,11,18 140:20 morning 86:4,10 86:24 87:6,23 88:18 97:19 mother 125:23 move 22:1,2,23 36:7,8 57:7 72:21 moved 16:13 54:7 63:18,20 63:21 81:18 moving 143:23 mumbling 74:17 municipal 4:21 28:25 31:23 32:6 33:3 muted 151:25 mutual 35:1	14:1 35:24 95:14,17 106:22 131:25 134:2 153:16 needed 54:25 nego- 99:19 negotiations 99:3,19 neither 158:1 network 40:7 never 60:5 65:11 65:17,17,23,24 65:25,25 66:6 75:4 109:3 new 52:8,12 103:15 newer 83:18 nice 88:11 night 32:7,12 33:25 34:1,2 107:25 124:12 131:16 nightshift 87:2 nine 32:13 120:24 nine-month 17:13 non-law-enfor... 28:15 non-police 69:5 nonresponsive 65:13 normal 95:13 normally 63:16 147:21 north 104:16 northbound 104:7 Notary 156:18 157:12 note 14:21 noted 156:3 notes 2:18 47:7 47:8,10,12,15 73:15 Notice 3:3 noticed 99:1	notified 79:16 80:10 November 2:12 3:14 36:23 51:4 54:15 55:5 93:12 95:1 96:11,14 number 79:9 numbered 1:16 numbers 89:23 134:2 nylon 133:14,19 135:13 nystagmus 98:12	122:1,7,12,18 122:22 123:4 123:12,20 124:1,13,18,22 125:2 objecting 41:25 43:23 objection 41:24 43:5 44:23 48:4,7 49:18 49:21 50:12,15 67:10,14,21 68:13 69:8 104:12 112:12 112:19 113:9 113:11 116:4 131:11 132:24 133:7 143:15 144:20 145:10 objections 105:19 objectively 128:13 obligated 131:5 observed 69:1 79:13 117:20 obtain 72:21 114:17 obtained 52:20 117:10 obviously 150:3 150:4 occasion 66:19 occur 41:5 65:5 73:23 96:19 occurred 65:16 65:25 110:11 158:4 Oct- 90:10 October 5:5 31:19 81:16 89:1,10 90:10 90:11 91:3 Off- 82:13 offer 11:20 offered 108:8 109:13	office 4:7,9,13 4:15,17 8:21 9:5,9,15 10:9 22:25 29:5,20 30:1 65:7 74:23 75:1 76:14 78:9 156:15 officer 2:19,23 5:6 10:16,20 10:25 13:10,20 17:12,20 18:5 18:12 19:8 20:2,4,5,6,12 20:25 21:11 22:24 23:18,22 23:23 24:6,19 27:20 31:19 33:12,15,20,25 34:1 36:23 37:4,7,9,14,15 37:16 38:7 39:2,18 41:20 42:10,21 51:24 53:25 54:5,11 56:18 59:9,13 59:16 60:9,9 61:3,12 62:7 62:15,19 63:25 64:1,22 66:9 67:8 68:6,10 69:1,13,14,15 69:19 70:21,21 71:25 72:3 74:21 75:25 77:12 78:20 80:11,17 82:5 82:7,9,13,14 82:16,17 83:10 84:18 88:23 90:18 91:22 93:19 94:4 97:14 99:14 102:24 104:23 107:20 114:1 115:3 116:10 120:1 121:8
N				
N 6:1 7:1 name 8:10 10:7 10:20,25 11:8 11:10 52:21 99:12 104:5 107:23 137:23 155:2 156:13 named 83:24 names 64:3,5 77:20 84:6 natural 35:25 nature 37:22 80:1 Navarro 1:21 7:13 8:8 near 65:1 83:18 103:13 104:7 107:24 necessary 87:22 109:16 112:9 113:16 121:24 128:7 neck 121:4 need 12:8,19				

130:3 131:3,6 131:8,10 132:14,15,20 132:23 133:4 134:15 144:16 144:24 145:6 153:1 157:13 157:21 159:4 officer's 79:18 159:9 officers 20:7 24:4,10 39:5 39:22,25 64:2 69:5,22,25 70:13,19,20 77:14,15,21 78:1,8,9 82:11 94:8,12 100:23 103:4 109:20 offices 9:12 39:21 official 90:12 Oh 8:24 14:4 71:9 90:5 103:10 136:10 145:1 147:15 OIC 62:8 okay 9:25 10:6 10:18 11:22,23 12:1,22 13:16 13:19 14:8,21 15:4,10,23 16:24 19:5,9 19:17,24 20:3 20:15 21:12,20 22:10,14 23:6 23:21 24:12,17 25:17,24 26:18 26:21 27:1,5,8 28:7 29:1,8,17 30:4,17,19 31:2,12,17 32:3 33:2,7 34:3,8,15,17 35:11,16 36:2 36:6,9,18,22 37:10,23 38:10	38:12 40:8 41:23 42:2,14 43:1,11,22,24 45:13,25 48:24 50:5,10,13 55:19 56:10,25 57:2 60:25 61:21,24 62:3 66:2 67:4,5 71:12,23 72:2 72:25 73:5 74:8,18 76:11 76:15 77:24 80:13 81:11 82:15 83:13,19 84:7,11,16 85:3 87:20,21 88:15 89:13,16 90:2,5,20 91:2 91:23 92:13,15 92:19,21 93:1 93:3,9 94:2,17 94:18 95:7,19 96:5,7 99:7 100:15,22 101:9 102:11 102:16,18 103:10,23 105:20 111:9 125:25 126:3 127:23 132:9 132:11,18 133:3 134:4,6 135:14 136:10 138:12 147:15 151:3,5,12 152:16 153:12 153:21 on-the-job 23:14,16 59:6 once 30:4 56:3 60:20 131:8 one-legged 98:11 online 57:12 open 83:12 89:20	opened 85:11,16 90:9,10 opening 22:3 90:12 operating 115:3 132:22 operation 153:10 opinion 118:25 145:25 opportunity 12:10 22:23 124:11 151:20 opposed 66:14 oral 1:10,14 8:3 157:9,13 Orange 51:5,13 51:17 order 17:11,11 45:3 60:14 131:5 153:14 ordering 153:7 Orders 8:6 ordinances 37:20,21 organ 113:1 original 85:21 159:3,7,10 Oscar 46:13 59:16 61:13 62:9,15 outcome 158:3 outer 135:6 outside 64:23 79:22 overlap 29:16 overnight 61:9 owner 83:22,23	126:6,7 130:15 134:21,23,23 134:24 148:20 148:22,22,23 152:1,17,19,19 152:20 153:22 153:23 package 99:25 100:1 page 2:2,8,10 3:1 4:1 5:1,12 14:5,18,20 61:24 62:4 81:9 89:16,19 90:3 91:21,25 138:21,22 140:13,15,23 140:23 141:5,8 141:16,17,23 142:1,3,8,10 143:18,23 145:14 155:1,3 156:1,4 159:6 pages 59:22 93:4 paid 20:8,16 22:6 26:7 27:13,19 30:9 32:2,7 33:15 33:19 38:1 51:8,9,23 55:16 101:2 pain 125:16 paint 83:7,9 panel 58:8 parades 26:16 paragraphs 8:7 Paralegal 7:24 parameters 45:1 parenthetical 147:13 parked 83:12 85:20 86:20 105:5 parking 105:5,6 117:24 part 18:12,14 48:8 60:16	68:5 78:4,15 78:15 81:21 82:23 118:18 130:23 141:6 part-time 51:5,9 partially 59:13 participate 62:16 particular 15:4 15:11 25:15 30:10 128:25 parties 8:5 148:10 157:21 158:1 159:14 party 50:18 67:21 157:17 Paska 145:6 pass 130:14 151:23 152:11 passed 104:10 passing 126:2 patch 138:1,3 Patino 84:21,24 84:25 Patricio 94:1 patrol 25:1 33:25 34:1 37:24 51:23 Pauska 128:4 144:10,16 pawnbroking 16:4 pay 74:13 93:14 100:3,12,18 PC 7:12 peace 17:11,20 18:12 24:19 27:20 33:11,15 33:20 36:23 37:7,9,14 53:24 54:11 56:18 66:9 67:7 69:25 70:13 93:19 94:4 121:8 144:24,24 145:6
--	---	---	---	---

Pecan 7:6 9:16	43:16,24 44:5	113:15,24	7:20	149:2,7 151:6
pen 137:25	44:14,19 45:8	114:7,12,16,21	phase 17:17,17	played 148:5
138:2	45:12,15,19	115:1,12,16,20	17:17 36:7	151:18
people 40:5 63:1	46:22,24 47:10	116:6,8,14,21	Phone 158:14	player 86:7
97:24,24	48:8,12,25	116:25 117:4,8	159:24	playing 24:5
percentage	49:15,25 50:10	117:14,20	photo 134:8	147:11,13
95:24	50:13,14,19,20	118:3,8,14	photograph	please 8:17,19
perform 107:10	51:14 55:18,23	119:8,13,19,24	5:13,14,15,16	10:2,19 11:8
107:11	56:6,8,11,15	120:4,13,24	5:17,18 132:3	11:22 12:9
period 42:9 43:7	56:17 57:22	121:16,21	134:12 135:5	18:21 19:10
60:17 90:14	59:19,21 60:6	122:3,9,14,20	135:18 136:1,3	28:3 29:3
Perkins 52:21	60:8,17,25	122:24 123:6	136:7,15,24	34:16 35:9,9,9
Perla 72:17	61:1,21,24	123:14,22	138:5,9	36:15 50:16
89:19	63:11,13 64:21	124:3,5,15,20	photographs	55:20 56:5
permanent	65:12,14,21	124:24 125:4	131:25 138:12	60:6 67:2
112:24	66:25 67:1,11	125:25 126:9	138:14	89:23 127:4,9
permission	67:13,15,24	126:22,25	phrases 149:9	127:11 129:25
103:7	68:1,14 69:14	127:15,19	149:23	131:20,25
Perry 2:5,7 6:9	69:21 70:4,5	130:3,14	physical 58:18	132:5 134:16
6:10 8:20,20	71:5,9,12,15	131:11 132:24	108:3 109:14	135:19 136:1
10:15,22,25	71:23,25 72:7	133:1,1,7,22	112:8 121:23	136:24 138:10
11:1 13:5,9,15	72:8,17 73:12	133:24 134:7	122:5	138:11,21,23
13:18,20 14:9	73:13,18 74:14	134:11 136:6	picks 148:5	140:3,14
14:19,21 17:7	74:16,18,20	140:9 144:20	pickup 104:10	141:17 142:21
17:9 18:1,4,5	76:7,8 79:1,2	145:10 151:25	104:15,20,24	143:19 144:6
18:21,22 19:9	81:5,7 87:5,8	152:3,11 153:1	105:3,14,22	146:16,24
19:11 20:19,20	87:15,21 88:8	153:14,16	picture 10:17	147:2,7 148:16
20:23,24 21:9	88:15 89:5,8	157:18,23	136:9	151:5,21
21:12,14 22:8	89:14,15,24	159:8	pigeon 70:12	153:15,20
22:10 23:6,8	90:1,2,21,23	person 96:18	pigeons 70:16	pocket 101:2
24:14,18 25:23	91:6,9,20,22	107:8 116:9	70:24 71:1	107:1 137:19
25:24 26:22,24	93:1,3,6,9	119:13 121:5	pistol 95:5 118:8	138:1
27:17,18 28:2	94:17,18,22,23	142:13 156:13	place 78:1 102:4	pockets 106:22
28:6,7,20,22	95:16,19,21	person's 121:4,5	103:21,24	point 12:8,19
29:2,4,22,24	96:5,7 98:15	personal 7:16	113:20 114:7,8	15:6 24:23
31:3,4,9,12	98:16 99:7,13	9:5 30:14	places 40:14	26:7 27:23
32:17,19 33:7	99:23 101:4,5	75:19 76:19	PLAINTIFF'S	29:15 38:21
33:9 34:4,7,9	101:19,20	personality	2:10	43:10 51:20
34:11,15,17	102:11,16,24	52:15	plaintiffs 1:15	70:5 72:6,8
35:9,17 36:2,6	104:14 105:8	personally	6:8 8:21 9:4,9	82:9,13 94:2
36:9,14,16	105:10,20	156:12	157:23 159:10	103:6 107:19
37:10,12 38:4	106:16,21	Pete 13:11	plaintiffs' 3:1	108:2,7,11,16
38:6,20 39:2	108:7,11,16	Peter 7:17 9:7	4:1 5:1 8:19	109:12 112:14
39:12,18 40:2	109:12,19,23	9:11,14 41:9,9	plate 83:21	114:7,22 115:7
40:8,24 41:2,5	110:17 111:9	48:22 67:12	104:24	115:16 129:14
41:11,14,20	111:10,14	99:10	play 97:19	131:17 143:5
42:2,14,21	112:1,6,14,21	peter@ghlaw...	145:23 146:3,4	pointed 64:25

65:8 74:22,22 75:2,4 129:16 pointing 65:8 police 3:11,17 3:22,24 4:3,5 4:23,25 5:3 18:10 19:8 20:2,4,5,5,12 21:11,16 23:14 23:17,18 33:16 37:16 45:25 51:5,13,17,21 52:4,8,12 59:24 63:13 64:8,23 65:7 66:23 68:6 70:16 74:23 76:5 77:12 79:9,13,17,18 80:4 93:19,23 94:4,13 100:23 103:16 109:20 112:22 114:2 115:4 117:11 120:1 126:12 126:15 131:3,6 131:8,10 132:23 133:6 policy 2:11 59:23 118:21 pooping 70:16 portray 138:5 138:16 position 3:11 20:9 22:3,6 24:24,25 26:7 27:6,8,11,19 29:12,20 30:7 30:9 32:1,2,2,4 32:5,7,8 33:1,6 33:16,20 38:2 51:8,9 54:8 56:19 57:4 59:17 88:20 89:9,18 91:3 91:11 93:16 94:14 128:20	150:4 possible 10:18 possibly 10:16 82:17 post 50:24 posting 3:11 89:17 Poteet 54:3,4,11 54:14 potential 128:9 potentially 22:2 129:9 practice 87:1 97:21 98:10 preemptively 35:13 preparation 45:20 prepared 79:5 126:10 127:11 preparing 159:10 presence 128:1 present 7:21 44:11,16 70:18 85:10 97:13 128:11 presentation 97:9 presented 45:4 96:20 108:2 112:16 113:4 115:7 117:15 121:11 122:25 123:18 Preston 107:23 presume 79:10 pretty 82:23 126:1 primarily 25:17 prior 12:25 90:16,19 103:18 111:7 129:17 134:2 private 30:12,16 31:6 privilege 13:14	43:23 45:6,6 47:23 48:7,20 49:5,11,13 50:1 99:6 101:22 102:2,6 102:10 103:9 104:13,18,22 105:2,12,24 106:2,5,9,15 106:20,24 107:3,6,9,13 107:18,22 108:1,6,10,15 108:20,24 109:2,5,11,18 109:22 110:1,4 110:7,10,18,20 110:25 111:2 111:13,17,20 111:25 112:5 112:13,20 113:2,14,18,23 114:6,11,15,20 114:25 115:6 115:11,15,19 116:1,13,16,20 116:24 117:3,7 117:13,19,22 118:2,7,10,13 118:17,20,23 119:2,7,12,15 119:18,23 120:3,7,12,17 120:23 121:2,6 121:9,15,20 122:2,8,13,19 122:23 123:5,9 123:13,16,21 124:2,7,10,14 124:19,23 125:3,6,9,12 125:15,18,20 125:22,24 126:13,17 127:2,6,14 128:15 130:6,9 130:11,13	133:2 152:8,10 privileged 42:1 139:20 probably 30:18 31:7 problem 147:24 problems 75:20 procedure 1:23 53:14 115:2 procedures 2:11 59:23 proceed 135:2 148:25 proceeding 158:2 process 63:14 88:17 91:13 95:8,22,23 produced 1:15 13:22 18:9 professional 57:14 program 17:14 progress 20:15 promises 128:5 promotion 93:18 94:4 promotions 40:13 proof 18:18 properly 105:5 107:21 property 25:18 25:19 protect 112:9 121:24 protected 129:20 protocol 119:20 119:25 proved 156:12 provide 18:15 23:24 provided 13:21 18:18 19:12 23:17 49:1 59:23,24 60:18	60:20 128:1 provisions 1:24 public 20:14 69:6 156:18 157:12 pull 13:15 17:7 18:2,2 19:9 20:19 21:9,12 22:8,8 23:6 25:23 26:22 28:2,20 29:2,3 29:22 31:3,9,9 32:18,18 33:7 34:4,5,15 35:10 36:14 38:4 55:18 56:15 59:19 60:25 61:21 66:25 70:4 71:5,23 72:7 73:12 76:7 79:1 81:5 89:5 89:14 90:21,22 93:1 94:17 95:18,19 98:15 101:4,19 pulled 19:11 108:11 pulling 107:16 purpose 78:1 128:7 purposes 141:12 142:4 156:14 pursuant 1:23 111:2 144:17 145:7 157:20 158:3 pursue 28:14 put 70:25 78:1 109:6,23 112:6 120:25 131:24 138:20 147:12 putting 115:23 <hr/> Q <hr/> qualifications 24:9 92:12
---	---	--	---	--

quality 147:25	R 6:1,4 7:1,5	117:4,15	115:22 123:2	120:14,25
quarter 82:24	radio 104:25	121:11 122:15	123:23	121:11,23
quarters 17:15	107:19 116:10	123:18 128:13	recommend	122:15 123:7
question 11:20	raise 10:3 93:14	reasonably	152:7	123:17,24
13:6,8 14:8	raising 42:8	112:8 121:23	record 1:24 8:2	124:20,24
41:13 44:2,3	Ramos 70:21	131:10	8:18 11:9	125:10,13,16
44:12 49:22	71:4,4 146:22	reasons 52:11	29:11 38:23	125:19 130:5,7
61:5 64:19	146:25	159:6	39:1,11,12,14	157:2,2,4
65:19 85:17	ran 83:19,20	rebuttal 128:16	39:17 41:10,16	Redus' 125:5,21
87:12,13,15	Ranger 104:10	recall 15:3,4,7,8	41:19 42:16,17	refer 70:9
88:6,7,14 90:8	104:15,20,24	15:11 16:20	42:20 49:4	reference 2:14
92:1 95:15	105:3,14,22	19:6,20 25:21	71:19,22	92:2
99:18 101:24	128:1,4	29:19 30:20	102:20,23	referenced
105:21 110:21	Rangers' 13:21	33:22 35:4	126:5,8 134:20	84:23
110:24 111:1,8	ranges 95:5	39:23 40:12	134:22,25	references 57:14
120:9 126:19	raped 110:3	43:21 45:23	141:12 144:24	referred 30:22
127:8,12,16,18	rate 79:14	46:2 58:6,7,8,9	148:21,24	referring 19:13
127:20,22	Ray 7:22	58:16 61:2,19	152:18,21	66:17
128:24,25	re- 34:25	62:10,11 63:5	153:15,22	reflected 92:16
129:22,24	read 48:5,8 49:1	63:22 64:13,16	157:14,22	reflects 142:24
130:1 131:19	49:4 50:21	64:20 65:2,10	recorded 47:18	142:25
131:21 133:4	67:1,3,4 79:3,4	65:21 68:1,3,4	148:3	refuse 152:7,9
142:18 143:2	81:8,11 87:11	68:15,19,22	recording 5:19	refused 120:8
143:10 149:11	87:13 90:23	73:5 75:9,15	146:10 147:11	refusing 110:20
149:12 150:9	98:17 127:18	78:2 81:12	147:12,13,19	111:1
150:13,17	127:22 131:20	86:8,13 89:11	147:25 148:1,5	regard 47:13
151:2	131:21 143:1,6	91:9 92:6,10	149:1,14,18	regarding 8:6
questioned	143:7,11,13,16	98:13 100:2,11	150:12,20	46:12,25 62:15
128:22 129:6	143:21 144:1,8	receive 40:13,16	151:6,17	88:17
questioning	144:9,18 145:4	53:17,18 76:12	recruited 15:22	regards 23:13
86:16 89:4	145:8 148:12	92:14,15,20	35:11,19 37:2	46:16 47:20
questions 12:18	156:2	93:14 99:13,24	Redus 1:2,3,4	registered 83:22
14:17 16:11	reading 48:3	received 34:21	11:2 47:22	83:23
67:2 102:13	ready 10:21,22	34:22 53:18	106:11,17	REGISTRAT...
128:24 129:5	55:24 135:1	62:6 92:17	107:12 108:2,7	158:12 159:22
131:13 144:22	real 10:5 12:2	93:19 94:3	108:13,22	regular 80:7
149:25	50:23 139:10	99:25 101:16	109:7,13,16,24	related 158:1
quick 10:5 41:8	147:6	recertification	110:2,5,12	relates 75:16
50:23 134:14	real-life 97:23	5:8 96:9,14,25	111:11 112:7	79:8
139:10 147:6	reapply 35:2	100:24	112:16 113:4	relation 75:16
148:11	rear 136:3	Recess 38:24	113:19,25	release 68:8
quickest 12:10	reason 15:1	39:15 41:17	114:8,22 115:7	120:8,9
quickly 11:17	30:10 34:22	42:18 71:20	115:13,17,21	relevant 46:7,17
143:24 147:7	42:8 150:7	102:21 126:6	115:23 116:9	rely 146:20
quite 88:1,9	155:3	134:23 148:22	116:21 118:11	remain 113:20
	reasonable	152:19	118:15,25	113:25
R	112:15 113:4	reckless 79:18	119:16 120:5	remains 93:18

remember 15:12 21:18 22:20 44:2,4 62:13 62:21 64:3,4 76:21,22 77:20	157:8 Reporters 8:11 157:16 158:13 159:22	resigning 99:14 resistance 108:8 109:14 112:9 121:24 122:5	90:23,25 93:4 94:18 98:16 101:6,7,20,21 153:4	143:24 144:4,7 145:16 148:19 150:6,21
reminder 69:2	reporting 8:12 81:3	resolution 80:18 resolved 62:18	reviewed 46:20 47:5 56:10 60:4 72:2 76:10 91:1 93:10 94:20 98:18,20 101:8	rights 50:16 150:25
remotely 1:12 8:5,13 157:10	represent 11:1	resolving 63:14 81:24	60:4 72:2 76:10 91:1 93:10 94:20 98:18,20 101:8	ring 19:14,14
remove 107:1 124:8	represented 42:10 43:8	resources 22:24 46:3 66:14,23 73:10 74:3	reviewing 72:1	Rios 6:4,4 10:8 50:8 127:24 129:15,24 139:11 140:8 142:17 143:3 144:22 145:2 145:25 148:15 149:4
removed 65:7 68:16,19,22 69:11 104:2,4	representing 42:13	respect 41:12 43:22 66:12	rifle 70:15	
Rendon 82:16	represents 67:6	respond 117:9 119:4	right 12:11 17:1 17:12,21 18:1 18:13 19:3 26:5,5,21 27:6 27:20 29:9,24 31:20 33:12,20 34:4 36:25 38:2,10,14,20 51:2,6,21 54:5 54:10 55:15,15 55:16,17 58:22 60:19 61:7,13 61:18 74:3 79:10 82:25 90:9 93:12,20 94:5 95:12,25 98:24 101:14 103:2,5,13,21 104:8,11,17 105:4 106:1,4 106:11 108:23 109:9 110:9,13 110:21 111:3 111:12 113:6 114:3,9,13 115:24 118:19 120:6 130:19 135:17,23 136:11,13,20 136:23 137:3 137:19,22 138:4,8,13,19 140:12 141:10 141:10,15,25 142:24 143:24	
repeat 14:8 39:6 74:24 77:5 94:10 103:22 127:9,11,15 131:18 133:17 141:6	reprimand 68:11 69:16 79:21,23 80:20 80:22	responded 106:17,23 111:15		
replace 89:19	reprimanded 67:15 68:15 69:4,11,23 70:1	restricts 121:4		ripped 82:24
report 3:5,23 4:2,4,8,10,12 4:16,18 5:4 23:14 29:25 81:3 82:20 85:22	reprimands 67:7	result 53:20 62:22 63:18 102:7		risk 108:4 112:16,23 113:4 117:15 121:11 122:16 122:25 123:18
reported 1:20 87:2,3	request 73:2 78:16 117:9	results 66:3 77:25 112:24		Road 6:5 10:10
reporter 1:19 8:3,10 9:23 10:2,6,23 12:3 13:3 48:21 57:21 87:16,18 99:10 105:17 110:16 113:10 113:13 124:4 127:17 128:19 132:25 133:15 133:17,21 134:13,19 147:9,9,18,21 148:7 151:25 152:12 153:6 153:12,18 157:11	requested 63:20	retail 16:5		Robert 1:3,4 3:3 7:11 9:18,25 13:4,12 146:14 157:2,4,19,24
Reporter's 2:9	requests 117:5 118:4	retained 42:23 43:19 47:16		Roberto 6:4 10:7 50:8
	required 23:20 26:15 60:3 77:11 94:24	retaliated 62:9 75:22		Rodriguez 46:13 59:13 61:13 62:9,15,19
	requirement 23:23 26:12	retaliation 46:12 46:14 61:16,17		Rodriguez's 129:3,17
	requirements 158:3	retire 54:24		role 45:3 50:7 97:19
	requires 42:5 128:8	retired 35:1 54:18,19 55:2		roll 100:13
	rescind 73:3	retirement 100:13		room 13:10 78:8 85:14
	reserve 20:2,4,5 31:19 54:5	return 99:14 157:16		Root 2:16 73:25 74:2,6
	resident 84:4,13 84:16,18 85:2 85:8 105:14,22	returned 44:6 159:3,5,7		roughly 119:9
	resignation 3:3 98:23 99:4	review 13:22 34:12 45:16,19 45:22,25 46:3 46:6,17,23,24 47:12 59:25 71:25 76:8,9 79:2 81:7		rubbish 37:22
	resigned 22:18 28:14 35:1 51:2 100:19			rude 12:4
				Rule 45:2 158:3 159:1,13
				ruled 139:18
				rules 1:23 11:14
				ruling 50:18

127:3 129:17 129:21 140:4 142:17 144:22 150:22,24 rumors 75:24 run 11:17 50:23 82:20 85:17 104:25 rvaladez@she... 7:15	scenario 24:10 scenario-based 96:24 97:7 scenarios 24:5 97:20 scene 85:22 114:12 124:6 scheduled 20:6 Schoenbrun 146:6,22 147:1 school 15:8 16:17 27:23 68:4,7 69:12 79:15 80:2,8 80:12 scream 130:7 screen 10:17 14:7 132:4 145:2 151:14 151:16 scroll 14:1,4,4 19:21 20:23 22:15 24:14 26:24 31:15 32:19 33:9 36:16,17 38:9 55:23 90:7 132:13 138:25 scrolling 90:3 seal 156:15 search 57:11 second 14:17,19 26:24 31:15 33:19 36:17 41:8,10 62:4 71:7 81:9 85:3 85:7 93:24,25 105:18 130:10 132:11 seconds 125:8 146:13 150:20 secretary 53:7 53:15 section 32:20 33:10 47:25 49:7 50:3 144:17 145:7	sections 17:16 see 14:3,24,25 18:7,8 19:19 20:25,25 21:2 22:10 26:2,3 27:3 28:8 29:6 30:2,3 31:14 31:16 32:22,23 36:9,20 38:7 38:11 40:7 41:9 46:15 48:17 61:25 62:2 67:8,9 75:13 83:2 89:17,18 90:9 91:24 92:4,9 95:14,17 96:9 125:13 132:9 132:14 135:18 137:2,18,25 139:2,4,6,8 140:18,23 141:10,20 142:5,12,14 144:10,14 145:3,12 146:19 seeing 30:20 seek 15:18,21 75:19 108:18 149:6 seen 29:11 60:5 66:18 67:19 69:10 segment 43:12 selected 151:15 self-incrimina... 50:2 111:3 semester 15:6 semesters 14:22 15:2 17:11,14 send 114:1 153:3,4 sends 148:10 senior 82:9 88:23 94:8,13 sense 30:19	sent 2:16 148:17 separate 17:15 54:13 64:9 separated 20:21 20:22 22:17 25:25 53:23 101:9 separation 3:5 3:15,23 4:4,8 4:12,16,20 5:2 20:25 29:25 32:20,21 34:12 38:7 54:17 78:24 101:6 September 19:20 20:1 28:11,23 81:22 Serbantes 2:13 2:23 67:6,16 68:10,16,20,24 69:13,15,19 72:12 76:6 79:6 82:2 sergeant 93:23 128:2 series 102:13 serious 64:12 112:16,17,22 112:23 113:5 115:8 117:16 121:12 122:16 122:25 123:18 serve 20:13 served 159:14 service 64:11 65:7 80:5 Services 129:4 seven 31:7 61:15 95:11 101:14 severance 99:25 100:1 shadowing 59:8 shake 12:1 Shamrock 15:13 15:15 Shannon 2:16 73:24 74:2,5,6	share 71:10 132:4 151:14 151:15,16 Shelton 1:21 7:12 8:8 9:13 42:22 sheriff 29:12 Sheriff's 4:7,9 4:11,13,15,17 22:25 27:2,9 27:12,18 29:5 29:19 30:1 39:4,20 shift 61:9 62:17 72:9 80:10 88:21,23 103:19 shifts 26:13,13 26:19,19 shirt 136:10,12 136:17,18 137:3,10,12 shit 110:8 shoes 20:11 shoot 70:16 71:1 121:17 122:10 122:14,20 123:3 shooting 123:14 123:25 124:6 126:9 short 126:1 136:16 137:2 short-sleeve 136:17,18 shorthand 1:19 157:11 shortly 36:24 shot 47:22 70:24 123:7,10,17 124:21,25 125:5,7,10,13 125:17 130:8 130:10 shots 125:7 130:12 show 21:15
S				
S 6:1 7:1,4 156:19 safely 105:3,15 safety 37:21 123:24 sales 16:5 San 1:22 3:18,19 4:19,21 6:5,21 7:7,13,19 8:9 9:6,16,19 10:10 13:25 14:12 16:12,13 16:16,25 21:24 25:13 28:24 31:13,14,20 55:7,8 57:7 79:8,13,17 94:1 96:21 129:3 Sanchez 104:5 SAPD 2:24 80:8 saying 27:6 113:10 147:12 says 13:5 20:21 26:25 28:10,13 30:1,4 34:25 38:10 49:19 62:4,5 84:23 89:19 129:4 139:5 140:18 142:13 143:7 144:9,13 scared 111:18 111:21 112:7 scaring 110:6,8				

24:14 125:16 showing 29:4 136:7 shown 45:24 76:13 159:14 shows 22:17 25:25 32:21,24 36:18 140:16 sick 100:6,12 side 25:1 82:23 92:1 135:21 137:25 sidebar 102:11 sidewalk 109:8 114:1 sign 60:3 signature 139:19,19 140:1,4 142:13 142:15,23 153:4 156:1,3 157:16 159:5 signatures 139:22 signed 142:25 significant 139:17 silent 9:21 similar 77:11,12 simply 95:23 singling 62:16 sir 20:18 25:6 47:3 50:22 52:10 54:20 55:3 57:3,13 66:24 70:8,11 70:14,18 75:21 76:21 82:10 85:15 86:11,16 86:20 87:16 88:19 90:4 96:1 97:6 100:4,17,21,25 101:3,15,18 106:13,23 135:23 136:13 136:20,23	137:4,22 138:4 138:8,19 140:7 140:12 141:7 141:10,15,25 142:24 143:8 144:2,4 145:16 146:17 153:6 siren 80:6 sit 124:15 situation 97:23 115:3 119:21 situational 24:4 situations 24:6 six 23:3 26:5 30:5 31:7,7 51:18 120:20 125:7 size 119:9 skip 138:10 sleeping 86:23 sleeve 137:11 sleeves 135:15 136:17 137:3 slowed 104:15 slurred 86:2 smelled 86:1 smooth 72:23 73:1,3 smoothly 11:16 sobriety 5:8 96:8 96:14 97:21 98:3 100:24 107:11 software 78:12 78:13 sole 115:3 solely 44:3 78:1 78:12 somebody 8:24 sorry 8:24 9:14 13:3 14:10 18:24 29:2 30:23 31:10 35:10,23 42:16 48:22 56:22 57:21 60:11 61:22 64:14,24	65:20,21 68:14 74:15,24 77:4 83:19 84:22 87:10,11 89:15 90:2 91:24 94:10 102:25 105:9,10,19 110:15 113:7 119:17 120:21 122:4 128:18 132:6 133:18 133:23 140:20 141:6 142:22 143:22 sort 15:21 23:12 37:22 sounds 151:22 South 6:16 space 105:6 speak 35:18 47:8 69:19 80:10 speaking 106:16 special 26:15 127:4 specific 15:9 24:10 49:22 59:4 66:16 specifically 42:8 53:5 speech 86:2 speed 79:14 80:12 104:15 104:16 speeding 80:8 spent 97:16 spoke 35:13 65:17,24,25 123:7 spring 14:23 squad 78:8 stamp 89:22 stamps 56:5 stand 13:16 98:7 98:11 standard 115:2 standardized 5:8 96:8,13	standing 21:5 28:14 49:18,18 start 35:12,20 37:5 61:5 86:12 132:1 started 17:2 145:24 starting 8:18 state 1:19,22 8:7 8:17 11:8 37:20 144:16 145:6 148:4 150:11 153:14 156:9,19 157:12 stated 1:24 53:12 69:9 statement 47:17 47:18 74:21 75:2,8 79:19 124:16 126:11 126:14,15,20 126:21 127:1,5 127:11,19,25 128:4,5,6,7,9 128:12,13,15 128:21 129:1,5 129:16,19,21 129:22 130:1 138:21 139:24 140:5 142:13 150:15 152:4 statements 110:11 117:1 129:8,10 151:1 states 47:24 49:6 50:3 116:4 128:3 139:20 146:22,25 147:20 stating 19:18 stations 15:13 status 116:11,17 117:10 stay 9:21 106:1 106:4 138:22 stayed 33:22	85:15 stenographic 8:13 stenotype 1:20 Stephen 71:4 steps 104:20 stop 16:11 27:25 28:1 104:20 118:16,19,22 118:25 119:20 120:1 139:3 stopping 120:13 120:18 stops 97:10 store 16:6,7,8,9 stores 16:4 straightforward 12:18 street 1:21 6:10 6:21 7:6,13 9:5 65:2 107:23 streetlight 65:1 strike 61:4 131:3 strikes 130:24 struck 131:8 student 87:6,22 students 69:6 84:5,8 studies 13:24 14:11 15:6 stuff 84:21 subject 2:17 127:5 146:8 subjects 98:1 submit 53:15 submitted 5:4 91:10 157:15 submitting 128:3 subpoena 149:15 subscribed 144:9,15 145:5 156:14 subsequent 151:2 substance 40:25
---	--	---	--	--

42:6 62:12	77:3	teach 98:2	157:21	Thompson
64:5 126:23	sworn 1:16	team 97:13,13	testing 97:21	47:12 61:25
128:21 139:24	10:13 128:2	97:14	98:8	73:9,21 74:3
140:5	144:10,15	team-based	tests 58:17 98:2	74:20 75:1,7
substantial	145:5 157:13	97:16	107:11	76:1,3
112:23	system 81:4	technique	Texas 1:5,20,22	Thompson's
substantiated		109:20	1:23 3:18 6:5	73:15
63:7	T	Telephone 6:6	6:11,16,21 7:7	thought 56:25
substantive	T 156:19	6:11,17,22 7:7	7:13,19 8:9,14	74:18 87:5,8
126:20	T-shirt 137:15	7:14,19	8:22 9:6,9,20	87:23,23
suffering 125:17	137:16	tell 9:22 13:23	10:10 13:21,24	threat 64:12
suffice 69:2	take 11:5 12:8	34:24 42:8	14:12 19:13	108:3
suggested 70:6	12:20 18:21	48:6,13 67:3	44:6 47:25	threatened
75:13	20:12 27:17	74:20,25,25	49:7 50:4	121:17 122:10
suggesting 77:1	37:10,13,16	75:10,12 76:9	128:1 144:16	122:14,20
Suite 1:21 6:10	38:20 44:19	79:3 81:7 86:6	144:17 145:6,7	threatening
6:16 7:6,13 8:8	54:25 60:6	90:24 95:17	156:9 157:5,12	123:3
8:14,21 158:13	63:11 70:15,15	98:17 101:6,21	158:14 159:23	threats 128:5
159:23	71:14 90:21	110:2,5,8	text 76:25	three 17:15 29:9
Summary 3:11	94:22 97:3	116:9 124:11	Thank 10:18	29:9,17 40:14
summer 44:8	102:14 104:20	144:8 148:1	18:4 49:9 56:7	40:17 54:12
supervised 95:7	125:25 134:14	152:5	56:9 67:25	66:10 95:10
supervisor 59:17	134:17,19	ten 52:2	71:17 87:14	101:13 115:20
62:8 69:13	138:12 145:17	ten-minute	89:7,25 91:8	116:8,14
80:10	147:16 148:11	148:11	93:8 116:7	130:12 147:2
supervisors 85:2	148:15,18	tend 11:25	132:19 140:8	149:8,8,23
85:2	152:13,14	term 21:4	145:1,1,16	Thursday 2:17
support 24:24	taken 1:16 12:13	termed 59:16	148:8 151:4,24	tight 121:3
26:11 29:12	117:8 149:25	terminated	152:16,25	time 8:1 12:24
supposed 80:22	157:21 158:2	34:18 52:7,12	153:2,13	15:10,11,12
Supreme 44:6	talk 12:15,16	55:1 62:19,20	therefor 159:6	16:20 17:13
139:21 147:4	talked 99:20	62:22	thermal 137:11	18:16 25:9
sure 36:4,4	talking 46:9	termination	137:12	30:11 35:21
44:25 49:20,24	74:19 116:10	52:17 53:10	thing 26:16	38:22,25 39:13
56:6 66:2	Tamez 64:22	terms 20:24,24	58:20 105:25	39:16 41:15,18
100:19 116:3	70:21 71:3,4	54:16 78:24	things 11:25	42:9,16,19
131:12 134:1	tapped 65:8	112:22 119:9	72:23 73:1,3	43:7,10 48:23
134:17 144:21	target 95:5,24	Tesoro 96:22	106:10 129:8	51:15 59:15
148:12 151:8	targeted 62:8	test 17:21,23	think 15:12	60:13 63:24
151:15 152:14	Taylor 7:5	37:13,16 85:24	30:19 32:13	67:3 68:25
suspect 83:21	146:20,21	95:4 98:1,6,8	39:8,10 48:19	69:9 71:13,18
84:10 131:9	147:2	testified 10:13	52:21 75:22	71:21 72:13,16
suspicion 109:1	taylor.beaver...	68:10	87:21 102:12	72:19 76:9
109:3	7:9	testify 47:23	126:1,24	78:5,7,11 79:3
suspicious 86:9	TCOLE 19:14	49:5	127:10,13	81:8,15 82:6,8
sustain 77:7	21:15 24:9	testimony 11:24	148:3,4,4,6	85:3,5,7,23
sustained 49:21	94:24	73:14 157:14	third 38:1 89:16	87:3 90:24

91:10 93:24,25 94:3 95:24 97:16 98:17 100:7 101:7,21 102:22 106:7 117:8 126:4,7 126:10 128:19 134:13,21,24 139:24 143:5 143:13 148:20 148:23 151:24 152:17,20,23 153:2,21 157:17,21 times 23:18 24:2 69:3 86:22 115:12 116:15 123:7,11 timesheet 53:7 53:11,16 timesheets 53:9 53:14 title 11:11 TMPA 52:20 today 11:5,16 12:5,8,15,16 13:10 19:14 21:23 45:24 93:18 124:15 152:24 153:2 told 63:8 65:4,23 75:7,13,18,24 76:3,11,11 108:17,22,25 109:3,24 111:11,14,18 112:7,14 117:14 118:15 118:18,24 135:6 Tom 128:2 Tompson 2:21 top 143:23 town 52:9 traffic 2:14,24 68:4,6,23 69:12 79:9	80:1,16 81:4 97:10,14 109:1 118:16,19,22 118:25 119:20 119:25 tragic 12:17 trained 16:13 130:18 trainee 16:2,3 training 16:15 16:25 17:4,10 17:16 18:6,11 18:14,19,23 19:1 20:13 23:9,12,13,14 23:16,17,19,24 24:3,3,5,7 59:4 59:6 60:10,12 60:18 92:2,8 92:11,14,16,17 92:24 96:24 97:7,13,17 119:3 130:23 131:13 transcript 3:18 12:5 13:24 14:11 153:8 157:13,15 159:11 transfer 73:3 transferred 78:17 trash 37:21 70:25 travel 30:21,25 traveling 79:14 80:11 Travis 82:14 83:11 84:18 TRCP 158:4 159:1 treatment 62:15 Tree 105:4 Treehouse 105:5 105:15,22 tried 85:8 trip 86:7	trouble 48:23 truck 82:24,25 83:7 85:20 103:16 109:8 114:13,16 true 127:13 156:3 157:14 truly 48:17 truth 124:12 152:5 truthful 124:17 126:16,22 150:14 151:1 try 12:18 73:1 103:23 trying 12:5 38:9 72:23 73:3 90:8 116:5 133:25 Tucker 70:9 75:13,15 turn 40:5 98:11 turned 83:23 105:4 turning 53:14 twice 82:2 119:9 two 14:22 15:2 17:10 23:20 26:13,19,19 27:23 29:18 46:11 58:24 59:11 64:9 68:12 78:7 84:1,7,8 92:7,7 93:4 105:18 108:21 110:12 111:10 two-page 19:22 two-year 23:19 type 25:15 98:6 135:10 <hr/> U <hr/> U 103:2 U.S 146:6 147:1 uh-huh 12:1 UI 9:15 137:1	UIW 5:4,12 8:23 9:15 18:9,10 18:15,18 40:24 42:11,13 43:14 43:20 44:14,14 45:16 46:8,18 46:25 50:24 51:2 56:8,12 56:18 58:3 59:23,24 60:9 60:19 63:13,24 65:2 67:5,7 68:6 69:6,24 70:10,12,16 71:24 77:7,10 77:12 81:6 86:23 89:16,24 91:6 93:6 94:13 96:6,7 98:24 100:23 101:6,10,13 102:9 103:2,12 103:16 107:20 128:11 134:3 135:25 136:5 136:15 137:1,1 138:17,23,25 141:12,19,19 142:3,4 145:17 145:20 151:7 151:17,20 152:4 154:2 UIW's 118:21 Ultimately 62:19 Ultramar 15:13 unable 15:5 unarmed 107:5 113:6 115:13 118:11 119:16 122:5,21,25 123:10 124:20 124:24 unbecoming 67:7,16 uncomfortable 10:19 Undergraduate	3:18 underneath 137:14 undershirt 136:12,19 137:17 understand 11:1 11:5 12:7,12 12:17 42:11,24 42:25 44:21,22 72:17 76:25 80:4,14 82:18 103:10 140:7 147:22 understanding 45:3,11 51:1 60:8 73:14 77:24 80:21 understood 79:13 112:21 113:15 119:3 121:3 129:23 unemployment 52:24 53:2,18 unfortunate 68:24 unholster 64:20 unholstered 64:23 unholstering 46:19 uniform 133:5,6 136:18 unit 2:24 4:19 29:12 31:14,20 31:22 32:6 79:9 United 47:24 49:6 50:3 139:20 146:22 146:24 university 1:7 3:7,9,16,18 5:6 7:2 11:3 13:24 14:12 36:11 38:17 40:20 41:22 43:3
--	---	---	--	---

44:9 46:1,4 47:18 55:25 66:8 67:17 92:2 99:2 101:25 132:22 137:21 157:6 157:24 unpaid 20:10 24:25 30:6,8 32:4 untruthful 150:15 upheld 52:23,24 Urban 7:18 use 17:14 18:19 98:3 112:10 121:25 123:15 130:19 150:10 usually 12:10 utilizing 78:10 UTSA 14:15 uttered 149:9	72:14 88:3,13 89:2,7 96:4 104:12 105:18 111:6 112:12 112:19 113:9 113:12,12 114:5 116:2,7 126:18 128:18 128:20 129:17 131:12,15,18 134:5,15 138:24 139:10 139:13 142:16 143:2,6,15 144:21 145:24 149:13,16,20 149:24 150:3 151:3,10 152:6 153:3,9 157:19 157:24 Valerie 1:2 11:1 157:2 vary 26:17 vehicle 79:14 80:4,5,7 83:11 83:21 84:10,10 86:17 103:25 105:1 vehicles 37:22 68:8,12 83:3,8 verbal 69:2 verbally 68:25 69:4,23,25 70:1 86:15 109:14 verify 35:7 80:9 versa 97:15 versus 129:4 139:21 146:6 146:22,23,24 146:25 147:1,3 150:11 vice 97:15 vicinity 108:3 Victor 1:18 8:10 50:9 127:8 157:11 158:11	159:21 video 40:2 96:16 97:9 148:3,5 153:19 videographer 7:23 8:1 13:16 13:19,25 14:6 18:3 38:22,25 39:10,13,16 40:4 41:15,18 42:15,19 55:19 59:20 71:6,10 71:18,21 102:19,22 126:4,7 132:6 134:19,21,24 148:20,23 151:13 152:17 152:20 153:21 videos 40:5 VIDEOTAPED 1:10,14 157:9 view 3:11 135:20 violate 139:14 violation 109:1 violations 37:21 violator 97:14 vise 121:4 visited 43:14 Vitacco 128:2 voice 76:1,4 145:22 146:5,8 146:10 149:21 149:23 150:2 150:10,18,23 151:21,22 volleyball 86:6 VOLUME 1:10 157:8 voluntary 127:24 128:3 138:21 139:24 volunteer 19:7 20:5,9,12 21:11,20 22:4 22:24 25:5	29:20 32:1 VS 1:5 157:5 <hr/> W <hr/> W 6:14,21 wait 11:19 waiting 127:16 waiver 150:5,25 wake 87:6,22 walk 98:7,11 wallet 107:1,8 want 9:1 44:25 49:10,20,23 50:17,23 89:2 90:7 91:25 99:19 102:14 116:3 127:15 144:7 147:10 147:11,23 148:14,15 149:4 150:4,13 153:7,8 wanted 22:3 94:14 116:21 wants 41:10 149:2 warrants 32:6 was/was 159:3 wasn't 63:8 79:23 80:22 109:1,16 118:9 118:11 122:6 124:21,25 132:9 way 42:11,11 48:17 52:17 63:8 135:15 138:5,16 142:16 143:20 we'll 12:22,22 26:24 37:12 49:25 102:17 102:17,17 we're 8:2 11:5 11:24 12:15,16 38:23 39:1,14 39:17 41:16,19	42:17,20 71:19 71:22 95:21 102:19,23 126:5,8 134:22 134:25 138:10 148:6,21,24 152:18,21 153:22 we've 19:11 138:15 146:24 weapon 5:6 46:19 64:11,23 65:7 94:24 95:22 107:7 114:13 weapons 24:3 wearing 133:5 133:10 135:5 135:21 136:3,8 136:16 137:9 137:15 weather 136:21 137:7 138:6,17 week 26:10 37:8 weeks 59:7,11 weight 119:9 went 16:17,24 21:10 22:24 24:2 29:19 51:20 83:2 84:11,20 85:13 100:23 weren't 47:10 112:3 115:13 118:5 119:10 Weslayan 8:14 158:13 159:23 West 4:25 5:3 6:16 9:5 35:12 35:20 36:20,23 38:7,13,17 39:3,19 40:9 56:20 Whataburger 103:13 104:6 white 83:7,9 137:15,17
---	--	--	--	--

Wilson 83:24 84:12	31:4 32:11 36:11 38:17	<hr/> X <hr/>	1/15/2013 2:15	12th 92:4,22
Wilson's 85:4 88:18	54:10 56:21 59:12 68:16,20	X 156:19	1:00 103:11	13 2:20,20 3:18 76:7,8 153:24
Wilson's 84:1	103:1 134:4	<hr/> Y <hr/>	1:21 126:4,6	130 2:6
Wind 135:12	worked 16:8	y'all 153:7	1:29 126:6,7	131 59:22
window 74:22 75:3,5	19:7 28:17 37:23 52:1,1	yards 95:11,11 95:11,11	1:35 130:15	134 5:13
windshield 103:17,19,20 103:23,24	58:21 59:13 93:24	yeah 38:9 39:8,9 39:10 40:6	1:39 134:21,23	135 5:14
wipe 124:8	Workforce 52:25	50:12 71:10 75:4 89:8	1:39:33 5:5	1351 71:24
withdraw 78:16	working 15:7,10 15:12 19:2	95:16 133:25 133:25 147:16	1:47 134:23,24	136 5:15,16
withdrew 64:10	21:16 25:6,7,8 27:25 28:1	149:3 152:13	10 2:5,18 47:25 49:7 50:3 71:7 71:11 73:12 100:19 101:10 102:4 153:24	137 5:17
witness 8:7,15 9:12,13 10:2 11:25 43:11 66:10,22 99:8 99:16 126:2,3 129:10,24 130:14 134:14 139:25 151:23 152:11 155:2 157:13,14,15 157:16	40:17 59:4 81:15 82:1 87:2 103:25	year 51:4 56:22	10/18/2013 89:20	138 5:18
word 1:7 3:7,9 3:16 5:6 7:3 9:19 11:3 36:11 38:17 40:20 41:22 43:3 44:9 46:1 46:4 47:19 56:1 66:9 67:17 68:7 69:12 92:3 101:1,25 132:23 144:11 144:12,24 157:6,24	Workmen's 30:14	years 16:21,23 23:20 25:21,22 27:23 54:12 66:10 77:23 101:13	10:00 61:10 103:1	14 2:22 21:15 68:15,21 69:3 79:1,2,5 153:24
words 52:8 125:21	workplace 22:12	27:23 54:12 66:10 77:23 101:13	10:04 38:22,24	145 5:19
wore 132:21 136:21	Worldwide 7:22 8:11 157:16 158:13 159:22	yell 125:23 130:7	10:23 38:24,25	15 1:11 21:15 27:9 28:17 95:11
work 16:6,18 21:10 23:15 25:15,20 26:14 26:15 30:12,14	write 98:19,21 141:4,7,12,23 145:13 147:12	you-guys 132:9	10:24 39:13,15	15-minute 92:25
	writing 23:14 69:25 139:9,19 140:18 142:5,6 144:1		10:25 39:15,16	150TH 1:8 157:7
	written 47:17 50:20 64:22 80:14,25,25 118:21 126:11 126:15	<hr/> Z <hr/>	10:27 41:15,17	152 2:7
	wrong 88:2,9,10	Zachary 6:9	10:29 41:17,18	155 2:8
	wrote 68:24 145:15	zcarlson@bur... 6:13	10:31 42:17,18	157 2:9
	Wymer 7:5 9:17 9:17,19	zero 57:1	10:42 42:18,19	1591 141:12
		zone 79:15 80:2 80:8,12	10:51 143:13 144:1	1592 141:19
		Zoom 39:9	101 3:15 5:9	1593 142:3
		<hr/> 0 <hr/>	11 52:2,3 123:6 157:18	15th 1:17
		0 157:19,19,19	11:27 71:18,20	17 3:2 98:15,16 98:19 153:24 158:12 159:21
		01/15/2021 155:2	11:43 71:20,21	171 45:2
		030 18:9	112 7:6 9:15	18 3:19 38:13
		<hr/> 1 <hr/>	12 5:5 19:12 26:14,14 73:16 81:16 84:11	1800 6:21 9:5
		1 1:10,10 2:11 5:13 17:17 47:25 49:7 50:3 59:19,22 60:7 134:3 153:24 154:2 157:8,8	12/10/14 3:4	18th 89:10 90:10 90:16,19
			12/6 142:25	19 3:21 102:1
			12/6/2013 143:7 144:1	1923 6:5 10:10
			12:30 81:15 86:3 86:10,24 87:6 87:22 88:18	1951 147:4
			12:34 102:19,21	1997 14:15 15:18
			12:51 102:21,22	1st 21:17 22:18 32:25 93:12
			120 56:8	<hr/> 2 <hr/>
			124 56:8	2 5:14 14:5

17:17 135:25 140:18 2.b 8:7 2:01 148:20,22 2:15 148:22,23 2:19 152:1 2:20 152:17,19 2:25 152:19,20 2:26 1:18 153:22 153:23 20 3:23 34:5 37:7,8 56:1 2000 6:16 2003 16:24 17:2 2004 17:5 19:20 20:1,12 2005 20:22 21:5 21:17 22:18,22 24:13,20 26:1 2006 26:1 27:9 2007 28:11,23 29:6 2008 2:12 30:2 31:19 2009 32:25 33:14 35:11 36:23 2010 56:2,13,22 99:15 2011 38:13 56:23,24 57:2 57:5 60:18 61:6 62:6 64:24 92:3,8 2012 46:12,19 61:2,15 64:7 64:17,24 65:10 2013 2:17,20,22 3:14 5:5 40:19 41:21 46:13 47:21 67:18 68:5,15,21 69:4 72:4 73:16 76:12 81:2,16 89:1 89:10 91:3 93:12 94:24	95:2 96:11,14 102:4 103:1,12 142:25 144:18 145:8 2014 42:22 51:2 100:20 101:10 102:4 2014-CI-07249 1:1 157:1 2015 51:4 102:1 2016 51:18 2017 52:5 53:24 2020 44:15 54:15 55:5 2021 1:11,17 156:16 157:10 158:6 159:17 2023 158:12 159:21 203 158:4 159:1 203.3 159:13 2047 92:20 205 2:23 2055 92:18 208 2:14 20th 36:23 21 4:2 24:13 210.222.9529 7:19 210.222.9540 7:20 210.224.1054 6:22 210.228.0887 6:22 210.349.3666 7:14,14 210.582.0220 7:7 210.734.0034 6:6 210.734.0266 6:6 218 2:13,23 21st 24:20 58:11 92:3 22 3:5 34:5,5,7	34:11 35:10 61:22 96:6,7 153:24 2200 6:16 223 158:12 159:22 23 2:22 3:7 4:4 55:18,21,24 56:16 153:24 235 8:14 158:13 159:23 24 4:6 25 4:8 95:11 25th 90:11 26 4:10 56:13 2630 6:10 26th 30:2 56:2 27 3:9 20:22 26:1 29:6 31:19 61:22 63:12 153:25 2721 67:5 2750 7:6 27th 21:5 28 4:12 29 4:14,16 81:6 2918 81:6 2919 81:6 2nd 95:1 146:6	89:14,16 153:25 3342 92:20 34 3:5,12 90:22 90:24 35 3:14 93:2,4 153:25 36 4:24 38 5:2 3rd 28:11	25:24 56 4:10 26:23 27:1,17 154:1 56th 146:6 58 4:12 28:3,5,6 28:7,21 154:1 59 2:11 4:14 29:3,4 154:1 5th 29:6 103:1
			<hr/> 4 <hr/>	<hr/> 6 <hr/>
			4 3:14 5:16 136:15 4:18 2:17 4:30 2:19 4:48 2:15 40 23:20 403F 146:6 4049 92:21 42 3:15 101:4,5 153:25 44 91:6 45 91:7 4630 8:22 47 3:18 13:15,20 17:7 153:25 48 3:19 18:2,5 18:21 153:25 4th 96:11,14	6 2:3,13 5:18 66:25 67:5 68:2 70:4 102:25 138:23 138:24,25 141:20 142:5 145:18 152:4 153:24 6:00 61:10 600 1:21 7:13 8:8 602.002 144:17 145:7 607 7:18 61 3:9 4:16 29:23,24 31:3 154:1 62 4:18 31:10,12 32:18 63 4:20 32:18,21 64 4:22 33:8 34:5 65 4:24 36:15,18 37:11 66 2:13 5:2 38:5 38:6 154:1 68 5:4 81:5,6,13 82:19 154:1 69 5:6 89:16,24 94:17,19,23 6th 41:21 47:21 102:14 103:11 144:18 145:8 152:5
		<hr/> 3 <hr/>	<hr/> 5 <hr/>	<hr/> 7 <hr/>
		3 5:15 17:17 89:19 90:3 136:5 157:18 30 51:11 55:12 104:16 30-minute 102:13 3000 8:14 158:13 159:23 3022 92:21 3076 8:11 158:11 159:21 31 4:18 3151 71:24 32 4:20 157:19 33 3:11 4:22	5 5:17 137:2 140:19 50 3:21 19:10 29:3 74:13 153:25 500 1:21 7:13 8:9 51 3:23 20:19,20 21:9 52 4:2 21:13,14 22:8 53 4:4 22:9,14 54 4:6 23:7 24:12 55 3:7 4:8 25:23	

75:19 96:4 138:24 145:20 151:7,17,20 154:2 70 5:8 95:20 96:4,6 71 2:16 5:9 101:19,20,24 154:1 713.401.9790 6:11 713.572.2009 158:15 159:24 713.993.7739 6:12 73 2:18 89:16,24 76 2:20 77010 6:11 77027 6:16 8:14 158:14 159:23 7745C 2:24 78201 6:5 10:10 78204 7:19 78205 7:7,13 8:9 78207 6:21 9:6 79 2:22	9:20 10:11 90 3:12 909 6:10 8:21 91 93:6 92 93:7 93 3:14 94 5:6 95 5:8 97 14:23,24 98 3:2 9th 33:14			
<hr/> 8 <hr/>				
8 2:17 71:7,11 157:10 8/12/23 2:19 800.572.1101 158:14 159:24 81 5:4 832.500.3170 6:17 832.500.3172 6:17 87 147:4 89 3:11 8th 19:20				
<hr/> 9 <hr/>				
9 2:16 62:6 71:5 71:24 72:7 153:24 9:17 1:17 8:1				