

SM Exhibit BN

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2 -----X

3 ADRIAN SCHOOLCRAFT,

4

-against-

PLAINTIFF,

Case No:

10 Civ. 6005

5

(RWS)

6 THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO,
Tax Id. 873220, Individually and in his Official
7 Capacity, ASSISTANT CHIEF PATROL BOROUGH BROOKLYN
NORTH GERALD NELSON, Tax Id. 912370, Individually
8 And in his Official Capacity, DEPUTY INSPECTOR
STEVEN MAURIELLO, Tax Id. 895117, Individually and
9 In his Official Capacity, CAPTAIN THEODORE
LAUTERBORN, Tax Id. 897840, Individually and in his
10 Official Capacity, LIEUTENANT WILLIAM GOUGH, Tax Id.
919124, Individually and in his Official Capacity,
11 SGT. FREDERICK SAWYER, Shield No. 2576, Individually
and in his Official Capacity, SERGEANT KURT DUNCAN,
12 Shield No. 2483, Individually and in his Official
Capacity, LIEUTENANT CHRISTOPHER BROSCART, Tax Id.
13 915354, Individually and in his Official Capacity,
LIEUTENANT TIMOTHY CAUGHEY, Tax Id. 885374,
14 Individually and in his Official Capacity, SERGEANT
SHANTEL JAMES, Shield No. 3004 and P.O.'s "JOHN DOE"
15 #1-50, Individually and in their Official Capacity
(the name John Doe being fictitious, as the true
16 names are presently unknown) (collectively referred
to as "NYPD defendants"), JAMAICA HOSPITAL MEDICAL
17 CENTER, DR. ISAK ISAKOV, Individually and in his
Official Capacity, DR. LILIAN ALDANA-BERNIER,
18 Individually and in her Official Capacity and
JAMAICA HOSPITAL MEDICAL CENTER EMPLOYEE'S "JOHN
19 DOE" # 1-50, Individually and in their Official
Capacity (the name John Doe being fictitious, as
20 The true names are presently unknown),

21

DEFENDANTS.

-----X

22

23

DATE: October 11, 2012

24

TIME: 10:20 A.M.

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(Continued ...)

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TIME: 10:20 A.M.

VIDEOTAPED DEPOSITION of the
Plaintiff, ADRIAN SCHOOLCRAFT, taken by the
Respective Parties, pursuant to a Notice and
to the Federal Rules of Civil Procedure, held at
the offices of the New York City Law Department,
100 Church Street, New York, New York 10007, before
Nathan MacCormack, a Notary Public of the State of
New York.

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

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 3 ADRIAN SCHOOLCRAFT
 225 Broadway, Suite 2700
 4 New York, New York 10007
 BY: JON L. NORINSBERG, ESQ.

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 COHEN & FITCH, LLP
 6 Attorneys for Plaintiff
 ADRIAN SCHOOLCRAFT
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 8 BY: GERALD COHEN, ESQ.

- and -
 9 JOHN MEEHAN, ESQ.

10 MICHAEL A. CARDOZO, ESQ.
 CORPORATION COUNSEL
 11 NEW YORK CITY LAW DEPARTMENT
 Attorneys for the Defendants
 12 THE CITY OF NEW YORK, DEPUTY CHIEF MICHAEL MARINO,
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 (the name John Doe being fictitious, as the true
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 to as "NYPD defendants")
 22 100 Church Street
 New York, New York 10007
 23 BY: SUZANNA PUBLICKER, ESQ.,
 ASSISTANT CORPORATION COUNSEL and
 24 QIANA SMITH, ESQ., SENIOR CORPORATION COUNSEL
 File #: 2010-033074
 25 Control #: HHH05718

(Continued ...)

A. SCHOOLCRAFT

1 A. To the best of my memory, it was it was a short
2 time after that. I think it was Summer, 2010.

3 Q. Do you owe your landlord any money for that
4 address?

5 MR. NORINSBERG: Objection.

6 A. Yes.

7 Q. How much do you owe the landlord?

8 A. I -- I imagine thousands, a few thousand dollars.

9 Q. When did you begin surreptitiously recording your
10 coworkers?

11 MR. NORINSBERG: Objection.

12 A. What does "surreptitiously" mean, what is that?

13 Q. When did you begin recording your coworkers
14 without their knowledge?

15 MR. NORINSBERG: Objection. You can answer.

16 A. I don't recall any date when I started. In 2006,
17 2007 or 2008, some time around that period.

18 Q. Why did you begin recording your coworkers
19 without their knowledge?

20 MR. NORINSBERG: Objection.

21 A. There wasn't any one specific reason. I was
22 documenting the roll calls, where officers receive orders
23 pertaining to their duties throughout the day. I was
24 particularly concerned about how they reference training
25 and sign the training log, and -- they wanted officers to

A. SCHOOLCRAFT

1 just sign the training log. And most of the time, we
2 didn't receive any training that I became aware of, was
3 mandated by police headquarters.

4 And I heard other officers talk about how
5 recorders can back you up from accusations made by people
6 on the street, and stuff like that. It wasn't any one
7 particular reason. It was -- it was to document the roll
8 calls and the falsifying the training log, and those -- I
9 don't recall any other particular issue or specific issue.

10 Q. Did you think at the time you made these
11 recordings, that you would be suing the City at some later
12 date?

13 A. No.

14 Q. Did anyone suggest to you that you record your
15 coworkers without their knowledge?

16 A. I don't recall any suggestion.

17 Q. Did your father ever suggest to you that you
18 record your coworkers without their knowledge?

19 A. No.

20 Q. Do you know if your father has ever recorded his
21 coworkers without their knowledge?

22 A. I don't believe so, no.

23 Q. How many recordings have you made that are
24 related to your claims in this lawsuit?

25 MR. NORINSBERG: Objection. You can answer.

A. SCHOOLCRAFT

1 A. The -- I don't know the specific number, but I
2 believe my attorneys have all the recordings. If --
3 perhaps they could be added up; I never added them up.

4 Q. Did you give your attorneys all recordings that
5 were relevant to this matter?

6 A. I believe they have all the recordings, yes.

7 MS. PUBLICKER: To the extent not already
8 produced, I would request production of all
9 recordings in this matter.

10 Q. Did you record every single one of your tours on
11 command?

12 A. I don't believe so, no.

13 Q. How did you choose what to record?

14 A. I didn't -- it wasn't always my choice. It was a
15 technology new to me. I don't believe -- like, you asked
16 me if my father ever recorded -- I don't believe the
17 technology was there. These devices require power,
18 batteries, the batteries go dead.

19 This is stuff that I didn't know. And there were
20 times where I had the recorder, but there were no
21 recordings. What was the question -- did I answer the
22 question?

23 Q. Did you attempt to record every one of your tours
24 on command?

25 A. I don't recall any attempt to -- to record

A. SCHOOLCRAFT

1 anything, exactly. There was no way to know when something
2 would happen.

3 Q. Did you record just the roll calls, or did you
4 record as well, other portions of your tour?

5 A. There were times where I think there are -- there
6 are -- where I didn't go back to my locker and put the
7 recorder back, and the recorder would go on until I did
8 that. It would be after roll call. There may have been
9 times like that.

10 But I don't recall recording the entire day or --
11 you know, I don't remember how long or when exactly I would
12 have the recorder.

13 Q. So it was not your intention, though, to record
14 your actual tours on command?

15 MR. NORINSBERG: Objection.

16 A. You mean including the roll call?

17 Q. Excluding the roll call.

18 A. I don't believe I ever intended to record the
19 entire tour. I didn't know if I had the technology; I
20 didn't know if it would run that long. My intent was to
21 catch -- to document the roll calls, the official, "This is
22 your duty today, this is what we want you to do, and sign
23 the training log."

24 Q. Why did you feel you had to record those roll
25 calls?

A. SCHOOLCRAFT

1 A. Again, the falsifying the training we were
2 receiving, numerous times, instructions on how to increase
3 our activity. What I was hearing was, "Arrest people or
4 summons people without probable cause." And I had a -- I
5 had concerns about those orders.

6 Q. What did you intend to do with those recordings?

7 A. What did I intend to do?

8 Q. Yes.

9 A. I had no -- I was just documenting -- I was just
10 documenting and somewhat corroborating to myself what was
11 being said. I had no -- I didn't start any investigation
12 at that time. I was just -- again, learning the
13 technology, and hearing what was said.

14 Q. So when you first started recording, you had no
15 intention of sharing these recordings with anyone?

16 A. No. I didn't think of anyone who would be
17 concerned. I never -- I didn't think about it. What I was
18 documenting was a pattern, not any specific one recording.
19 But a pattern over a period of time of this -- of what
20 supervisors were telling patrolmen.

21 Q. Did you save every recording that you made?

22 A. I don't believe so.

23 Q. Did you delete recordings?

24 A. Not intentionally. Again, there were times where
25 the battery would go dead transferring the recording to the

A. SCHOOLCRAFT

1 computer. Not having the right software, I believe there
2 were a loft last.

3 Q. When you say "a lot," what do you mean?

4 A. It seems like I had more. But again, my
5 attorneys have all the recordings that I am aware of, at
6 this time. The technology -- it's hard to explain. I had
7 recorders, one was a watch that was difficult, it was
8 touchy. The technology was touchy.

9 Q. How many recordings would you say were
10 accidentally deleted?

11 A. There is no way for me to know. I couldn't even
12 approximate how many.

13 Q. More than 50?

14 A. There would be no way for me to know if I -- if I
15 didn't know if they were deleted.

16 Q. You wouldn't realize it when you were trying to
17 transfer it to your computer?

18 MR. NORINSBERG: Objection.

19 A. I would have to specifically make a note that I
20 transferred that -- that recording or data, and then know
21 that it was gone later. There's just no way. I believe
22 there was more, it just seems like there was more. And --
23 it was -- I can only blame it on the technology. It was
24 touchy, the software.

25 Q. What technology did you use?

A. SCHOOLCRAFT

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

2 Q. Prior to October 31, 2009, had you ever made any
3 misconduct allegations against Defendant Marino?

4 A. If I did, I don't remember.

5 Q. Your Complaint states that on March 16, 2009,
6 Defendant Caughey issued you a written reprimand for not
7 documenting in your memo book that you had used the
8 bathroom facility on our assigned post; is that correct?

9 A. To the best of my memory.

10 Q. Do you have a copy of that written reprimand?

11 A. I don't believe so, no.

12 Q. Why not?

13 MR. NORINSBERG: Objection.

14 A. I don't know if I ever received one, or if I have
15 it. I am not aware of it.

16 Q. Did you ever receive a written reprimand?

17 A. I am not of aware of what a written reprimand --
18 it would be -- no. I don't recall ever seeing it. But if
19 I did, it's possible.

20 Q. What does it mean to be "off post"?

21 A. You are assigned a specific area, and to be off
22 post would be out of that area.

23 Q. Are you supposed to document when you are off
24 post during your tour?

25 A. I believe so, yes.

A. SCHOOLCRAFT

1 Q. Did she tell you to go speak to someone about
2 your issues?

3 A. It's possible, but it wasn't -- I don't think I
4 understood exactly who I was supposed to go see.

5 Q. Did she ever make any recommendations of somebody
6 to go see?

7 A. It's possible. I believe in October, 2009, I
8 finally expressed that I was -- that I wanted to know why I
9 was on modification -- or modified, restricted.

10 And -- and I believe, I recall her -- or she said
11 she was going to send me a list of names, or she gave me a
12 list of names.

13 Q. Did you go see someone?

14 A. I don't -- I don't believe so, no.

15 Q. Why not?

16 A. I didn't -- again, until she -- if she ever gave
17 me the list, I wasn't aware of who I was supposed to go see
18 or what the -- what they wanted to do.

19 Q. Did you want to get your guns back?

20 A. I wanted to go back to the normal duty. I wasn't
21 concerned about the gun. I was concerned about being a
22 patrolman again, and --

23 Q. Could you work as a police officer without a gun?

24 A. I don't -- in -- police officers are faced with
25 dangerous situations, sometimes. And in order to defend

A. SCHOOLCRAFT

1 A. I don't recall if I had lunch with anyone or
2 where we went.

3 Q. Your Complaint states that Lieutenant Caughey was
4 menacing and threatening to you, by keeping his hand on his
5 gun on October 31, 2009; is that correct?

6 A. Correct.

7 Q. Did you believe he was going to shoot you?

8 A. At the time, I believed his behavior was
9 inappropriate. And I -- I felt anything was possible.

10 Q. Did you believe that anyone from the N.Y.P.D. was
11 going to use their firearm against you on October 31, 2009?

12 A. I don't recall specifically thinking that, no.

13 Q. Had anyone from the N.Y.P.D. ever threatened you
14 with a firearm prior to October 31, 2009?

15 A. I don't believe so, no.

16 Q. You allege that P.A.A. Boston told you that she
17 also believed Defendant Caughey was menacing that day; is
18 that correct?

19 A. Yes.

20 Q. Did you record that statement by her?

21 A. I don't know if -- I don't know -- I haven't
22 heard that recording; it's possible.

23 Q. Did she tell you why she thought Lieutenant
24 Caughey was menacing?

25 A. I don't remember if she did or not.

A. SCHOOLCRAFT

1 Q. On October 31, 2009, did you state in reference
2 to Defendant Mauriello, "I would like to at least have a
3 fucking chance to go in a gun battle with him"?

4 A. What was that again?

5 Q. Did you state on October 31, 2009, in reference
6 to Defendant Mauriello, "I would like to have at least a
7 fucking chance to go in a gun battle with him"?

8 A. I don't recall making -- ever making a statement
9 like that.

10 Q. Do you recall making that statement about anyone,
11 not including Defendant Mauriello?

12 A. I don't recall ever making that statement about
13 anyone, no.

14 Q. On October 31, 2009, do you recall stating in
15 reference to a recording device, "How long do you think
16 that'll fucking stay on me, after they fucking kill me?"

17 A. Again, I don't recall making that statement, but
18 it's possible.

19 Q. Who did you make that statement to?

20 A. I would have to hear the recording.

21 Q. But sitting here right now, you don't recall who
22 you made that statement to?

23 A. No.

24 Q. Had anyone at the N.Y.P.D. threatened to kill you
25 prior to you making this statement?

A. SCHOOLCRAFT

1 MR. NORINSBERG: Objection.

2 A. I didn't receive any explicit threat, no.

3 Q. Did you receive any implicit threat?

4 A. I felt Caughey's behavior that day was menacing
5 and threatening.

6 Q. And you believed that he was threatening to kill
7 you?

8 MR. NORINSBERG: Objection.

9 A. I believe his behavior was menacing, and
10 intimidating and threatening.

11 Q. Besides Lieutenant Caughey, were you in fear from
12 any other member of the N.Y.P.D.?

13 A. I don't recall any exact -- I was concerned; I
14 don't know if I would define it as fear. Maybe at certain
15 times, I was more concerned towards the end of the day.

16 Q. Who were you concerned about at the end of the
17 day?

18 A. Mostly, Lieutenant Caughey.

19 Q. Did you tell anyone on October 31, 2009, that
20 "Mom is speaking to me"?

21 A. I don't recall ever making that statement, no.

22 Q. Do you recall making a statement on October 31,
23 2009, "I have heard guys say that I am six-foot four and
24 that I lift motorcycles over my head"?

25 A. I don't recall ever making that statement.

A. SCHOOLCRAFT

1 A. What was that again?

2 Q. Was the basis of the evidence you were presenting
3 to I.A.B. and Q.A.D., audio recordings that you had made?

4 MR. NORINSBERG: Objection.

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

6 Q. You had no intention of providing I.A.B. or
7 Q.A.D. the audio recordings you had made?

8 MR. NORINSBERG: Objection.

9 A. To the best of my memory, the recordings -- I
10 wasn't -- no, not at that time, or any time. I don't
11 recall thinking about giving the recordings to anyone.

12 Q. Did your I.A.B. Complaint, prior to October 31,
13 2009, allege retaliation against you?

14 A. The date again, or just the whole question,
15 please.

16 Q. Did your I.A.B. Complaint, prior to October 31,
17 2009, allege retaliation against you?

18 A. Can you be more specific on what Complaint.

19 Q. Did you make any Complaints to I.A.B. that anyone
20 had retaliated against you?

21 A. I believe so. Off the top of my head, what was
22 the -- it wouldn't be -- I believe they were asking me
23 about my 2008 evaluation appeal. But I didn't feel I had a
24 case of retaliation yet.

25 I was -- I was waiting for the appeal to be

ORIGINAL

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DATE: SEPTEMBER 26, 2013

TIME: 10:10 A.M

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

2 LAW OFFICE OF NATHANIEL B. SMITH
 Attorneys for the Plaintiff
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 111 Broadway
 4 New York, New York 10006
 BY: NATHANIEL B. SMITH, ESQ.

5 -AND-
 JOHN LENIOR, ESQ.

6

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 BY: SUZANNA METTHAM, ESQ.

23 -AND-
 RYAN SHAFFER, ESQ.

24 File #: 2010-033074
 Control #: SSS08994

25 (Continued...)

A. SCHOOLCRAFT

1 Q. Well, I just wanted -- we were talking about
2 retaliation. I wanted to see what the retaliation was at
3 that point in time and you said it was because of your
4 performance.

5 A. I don't think it says in those summaries
6 because -- well, I think it does explicit say, it refers to
7 activity. But there are other comments in that report that
8 are critical of my performance. And I wanted to contest
9 the entire evaluation, not just the areas of activity,
10 which they were saying you can't contest it based on that.
11 How I was contesting it was I was saying that evaluation
12 was based on activity.

13 Q. At the meeting in February of 2009, where you met
14 with supervising officers and discussed your evaluation and
15 your appeal, did anyone say anything at that meeting to you
16 that indicated to you they were retaliating against you?

17 A. Off the top of my head, I don't recall.

18 Q. Do you recall anything inappropriate being said
19 to you at that meeting by any of the people present?

20 A. Inappropriate, I don't think so. I don't recall.

21 Q. At the end of that meeting you were still
22 committed to going ahead and appealing your evaluation?

23 A. I believe it was determined at the end of the
24 meeting Mauriello said, that's it. It stays at two point
25 five. And based on that, I was still committed to the

A. SCHOOLCRAFT

1 referred to on the recording that is Defendants' Exhibit E
2 for identification, there was mention by you in that
3 recording of troopers and sheriffs that didn't do anything
4 to aid your father whose house was burglarized.

5 A. Correct.

6 Q. When did that happen, your father's house was
7 burglarized?

8 A. It would have happened while he was living with
9 me. I believe it was 2007.

10 Q. It was your house as well?

11 A. I don't know if my name was on it, but it was
12 definitely my father's.

13 Q. In other words, it was where you lived as well at
14 the time the place that got burglarized?

15 A. No, I believe it was house in Fonda, New York.

16 Q. And your father was not living there at the time?

17 A. No, he was either in the hospital or with me.

18 Q. Was anyone living there?

19 A. No.

20 Q. So in 2007 it was burglarized and you felt the
21 troopers and the sheriffs were unhelpful?

22 A. Well, I think I stated they didn't document
23 everything that was taken, that we had told them was taken.

24 Q. You were not pleased with their actions?

25 A. Yes.

A. SCHOOLCRAFT

1 understand he was writing a book?

2 A. I don't recall when I learned that he was going
3 to do a book or if he was going to do a book.

4 Q. Did you ever discuss that with him?

5 A. I believe there were discussions, but I don't
6 recall when they were.

7 Q. You had no interest in raising with him any kind
8 of compensation or remuneration you would receive as a
9 result of him writing a book about you?

10 MR. SMITH: Wait. That is a different
11 question.

12 Q. Did you have any interest in receiving any
13 compensation or remuneration from the book?

14 MR. SMITH: Objection to form.

15 A. No.

16 Q. No interest at all even thought it was all about
17 you?

18 A. I am not aware that it is all about me.

19 MR. SMITH: He said he didn't read it.

20 Q. It's all about your tapes. You said you didn't
21 read it?

22 A. No. I have received no compensation. I never
23 asked for compensation.

24 Q. And you have no expectation of ever receiving any
25 compensation?

A. SCHOOLCRAFT

1 MR. SMITH: From Graham Raymond?

2 MR. KRETZ: From Graham Raymond.

3 MR. SMITH: Just to be clear.

4 Q. How about the publisher?

5 A. No one in any relation to that book has ever paid
6 me nor do I expect to be paid for the shows or other
7 articles or that book.

8 Q. Anyone else you expect to get paid for aside from
9 Mr. Raymond?

10 A. My employer after this is resolved.

11 Q. I mean anyone you expect to be paid for the book
12 other than Raymond, in other words, anyone else receiving
13 benefits from the publication of the book, you know of?

14 A. No.

15 Q. So you provided him with all your recordings no
16 strings attached?

17 MR. SMITH: No financial strings, is that
18 what you are saying?

19 Q. Were there any other strings?

20 A. I don't know if I gave him all the recordings.
21 But there was no -- there was no -- I don't recall ever
22 receiving anything from -- I think he bought me lunch a
23 couple of times.

24 Q. Before you first contacted IAB regarding the
25 lieutenant providing the sergeant with access to your

A. SCHOOLCRAFT

1 personnel folder, did you tell anybody you were contacting
2 IAB?

3 A. That may have been one of the things I shared
4 with Durk either right before or after I made the report.

5 Q. Did your tell your father as well?

6 A. My father was aware, yes.

7 Q. Anyone else?

8 A. Other than Carter, the one who told me.

9 Q. You told Carter you were reporting to IAB?

10 A. No, she told me what had happened. I didn't tell
11 her I was going to do a report.

12 Q. After you sent the report to IAB, the 49 it was,
13 is that a 49 you prepared?

14 A. I believe it was at least close to a 49. There
15 may be some spaces wrong but it was.

16 Q. After you sent that to IAB, did you tell anyone
17 you had done so?

18 A. I think I might have talked to Durk again after
19 that and made him aware of that. But I don't remember
20 everything I told him.

21 Q. So aside from Durk and your father, do you recall
22 ever telling anyone you submitted a report regarding that
23 personnel file?

24 A. I don't believe so.

25 Q. Do you believe anyone in the 81 learned that you

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1 or something else?

2 A. Correct. I am not sure.

3 Q. She asked you before she went to QUAD, what it
4 was and where it was, and all these kinds of things. Did
5 you speak with her after she returned from Quad?

6 A. I don't believe so.

7 Q. Did you speak with Officer Deck when he returned
8 from QUAD?

9 A. I don't recall any conversation with him about
10 QUAD.

11 Q. Were you aware he went down to QUAD?

12 A. I believe Santana told me they were both notified
13 to go at the same time and neither of them were sure where
14 to go.

15 Q. You didn't speak to Deck or Santana after they
16 went down to QUAD?

17 A. I don't recall any conversation with them.

18 Q. Did you speak to anyone about your visit to QUAD,
19 your interview with QUAD?

20 A. I don't believe so, no.

21 Q. Did you speak to anyone about the fact Deck and
22 Santana went down to QUAD?

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

24 Q. Did you tell anybody you thought they went down
25 because of what you told QUAD?

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1 A. To the best of my memory, I didn't tell anyone
2 about, I followed the investigator's instructions.

3 Q. Did Captain Lauterborn ever talk to you about
4 approaching Deck and Santana after they had gone down to
5 QUAD?

6 A. No.

7 Q. So Deck and Santana were called down to QUAD.
8 Did they know you were called down to QUAD? Did you tell
9 them that?

10 A. After she approached me, I may have stated that I
11 was just there, and I know where it is. I believe it was
12 across the street from the 77th Precinct.

13 Q. Did you tell her anything else?

14 A. No. I don't recall sharing anything with her.

15 Q. Did you speak with anyone else about the fact you
16 had gone to QUAD or Santana had gone to QUAD, or Deck had
17 gone to QUAD at any time prior to October 31st?

18 A. My father knew I was going. I may brought it up
19 with Durk and the IAB investigator I was talking to. But
20 no one was assigned to the 81st Precinct, I don't believe I
21 told anyone.

22 Q. Do you believe anybody found out you had been
23 down to QUAD?

24 MR. SMITH: Asked and answered.

25 A. I believe that is possible.

A. SCHOOLCRAFT

1 Q. I asked before about IAB. And we talked about
2 Coy. Now I am asking about QUAD.

3 MR. SMITH: Bearing that distinction in mind
4 if there is one.

5 Q. Do you have any recollection of anybody finding
6 out you had been down to QUAD?

7 A. No.

8 Q. Did anybody ever indicate to you they knew Deck
9 and Santana went down to QUAD?

10 A. I believe Santana told me she was going.

11 Q. Did anybody else aside from Deck and Santana tell
12 you they understood Deck and Santana went down? Like come
13 to you and ask, do you know why they went down or what's
14 going on?

15 A. No, I don't recall any conversation like that.

16 Q. Do you recall any conversation by anyone relating
17 to QUAD and any complaint you might have made to QUAD or
18 the fact you got called down to QUAD at any time prior to
19 October 31st?

20 A. Only Santana asked me directions, and I believe
21 she asked me what QUAD was.

22 Q. You told me that. So you do have some reason in
23 your mind to believe Coy knew you had been in touch with
24 IAB. But you don't have any reason to indicate that
25 anybody knew you had been in touch with QUAD or complained