

Exhibit B

Jim Stern Deposition

Vargas

Stern Jim

9/11/2020

Condensed Transcript

Prepared by:

Bill Ragen
CCSAO

Tuesday, August 31, 2021

Page 1	Page 3
<p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ILLINOIS</p> <p>3 EASTERN DIVISION</p> <p>4 LETICIA VARGAS, et al.,)</p> <p>5 Plaintiff,)</p> <p>6 -vs-) No. 18 CV 1865</p> <p>7 COOK COUNTY SHERIFF, et al.,)</p> <p>8 Defendant.)</p> <p>9</p> <p>10 The videoconference deposition of</p> <p>11 JIM STERN, called for examination pursuant to the</p> <p>12 Rules of Civil Procedure for the United States</p> <p>13 District Courts pertaining to the taking of</p> <p>14 depositions, taken before Raelene Stamm, Certified</p> <p>15 Shorthand Reporter licensed by the State of</p> <p>16 Illinois, on the 11th day of September, 2020, at</p> <p>17 the hour of 8:00 a.m.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23 Reported by: RAELENE STAMM, CSR</p> <p>24 License No.: 084-004445</p>	<p>1 I N D E X</p> <p>2 WITNESS EXAMINATION</p> <p>3 JIM STERN</p> <p>4 By Mr. Ragen 7, 41</p> <p>5 By Mr. Flaxman 26</p> <p>6 By Mr. Catania 38</p> <p>7</p> <p>8</p> <p>9</p> <p>10 E X H I B I T S</p> <p>11 NUMBER IDENTIFICATION</p> <p>12 Stern Deposition Exhibit</p> <p>13 No. 1 43</p> <p>14 No. 2 43</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
Page 2	Page 4
<p>1 APPEARANCES:</p> <p>2</p> <p>3 KENNETH FLAXMAN LAW OFFICES</p> <p>4 BY: MR. JOEL FLAXMAN (via video)</p> <p>5 200 South Michigan Avenue</p> <p>6 Chicago, Illinois 60604</p> <p>7 (312) 427-3200</p> <p>8 On behalf of the Plaintiff;</p> <p>9</p> <p>10 COOK COUNTY STATE'S ATTORNEYS OFFICE</p> <p>11 BY: MR. WILLIAM RAGEN (via video)</p> <p>12 302 Richard Daley Center</p> <p>13 Chicago, Illinois 60602</p> <p>14 william.ragen@cookcountyil.gov</p> <p>15 On behalf of the Defendant,</p> <p>16 Cook County;</p> <p>17</p> <p>18 COOK COUNTY ATTORNEY GENERAL OFFICE</p> <p>19 BY: MR. FRANCIS CATANIA (via video)</p> <p>20 MR. JOHN POWER (via video)</p> <p>21 50 West Washington Street</p> <p>22 Chicago, Illinois 60602</p> <p>23 francis.catania@cookcountyil.gov</p> <p>24 On behalf of the Sheriff's office</p>	<p>1 MR. RAGEN: So I was talking to Joel Flaxman,</p> <p>2 counsel for plaintiff, and I haven't talked to</p> <p>3 Frank Catania about it, but I doubt he has an</p> <p>4 objection. But we were discussing stipulating to</p> <p>5 the authenticity of the Countryside Police</p> <p>6 Department documents. Correct?</p> <p>7 MR. FLAXMAN: Yes.</p> <p>8 MR. RAGEN: And so what will be used as an</p> <p>9 exhibit here as a -- and we can email it to</p> <p>10 Raelene. Most of the time I'll be screen sharing</p> <p>11 it if we talk about it, but it is a -- how many</p> <p>12 page document is it?</p> <p>13 MR. FLAXMAN: I'll have to pull it up. It was</p> <p>14 attached to Sergeant Soak's deposition.</p> <p>15 MR. RAGEN: Correct. And that'll be probably</p> <p>16 95 percent of what we use. There's now an addendum</p> <p>17 that has eight extra pages, but the one I believe</p> <p>18 it was Exhibit A, but I think it was like 58 pages</p> <p>19 or so.</p> <p>20 MR. CATANIA: 57.</p> <p>21 MR. RAGEN: Sounds like you're looking at it.</p> <p>22 MR. CATANIA: Yeah.</p> <p>23 MR. RAGEN: So that 57-page document which has</p> <p>24 been Bates-stamped by plaintiff to the</p>

<p style="text-align: right;">Page 5</p> <p>1 authenticity.</p> <p>2 MR. CATANIA: So stipulated for the sheriff.</p> <p>3 MR. FLAXMAN: So stipulated for the plaintiff.</p> <p>4 MR. RAGEN: Then there's four videos that are</p> <p>5 of witnesses. One of Joel Castillo and three of</p> <p>6 Leticia Vargas, and we'll stipulate to the</p> <p>7 authenticity of those videos.</p> <p>8 MR. FLAXMAN: So stipulated for the plaintiff.</p> <p>9 MR. CATANIA: So stipulated for the sheriff.</p> <p>10 MR. RAGEN: And there's a lot of videos in this</p> <p>11 case, so if we're trying to figure out what --</p> <p>12 where it comes from. They came from the</p> <p>13 Countryside Police Department. And in response to</p> <p>14 I believe plaintiff's subpoena, and Mr. Flaxman</p> <p>15 emailed us the link to those four videos in the</p> <p>16 last, you know, two weeks, correct, Joel?</p> <p>17 MR. FLAXMAN: Yes, that's correct.</p> <p>18 MR. RAGEN: Okay. And then, finally, there is</p> <p>19 a 8-page document that was emailed in that same</p> <p>20 email along with the links to the video by</p> <p>21 plaintiff's counsel, Joel Flaxman. Portions of</p> <p>22 that report were in the 57-page exhibit we just</p> <p>23 talked about that was used at Soak's dep. This is</p> <p>24 a new document, but basically what it does is</p>	<p style="text-align: right;">Page 7</p> <p>1 MR. RAGEN: Let the record reflect that -- I</p> <p>2 don't know if there's a statement that you want to</p> <p>3 read, Raelene. I believe the parties have all</p> <p>4 agreed to conduct this deposition remotely and have</p> <p>5 the oath sworn remotely and that, you know, this</p> <p>6 deposition transcript can be used as if it was done</p> <p>7 in person and as if it was done in conformance with</p> <p>8 all the federal rules of civil procedure; is that</p> <p>9 correct?</p> <p>10 MR. FLAXMAN: Agree on behalf of plaintiff.</p> <p>11 MR. CATANIA: Agree on behalf of the sheriff.</p> <p>12 MR. RAGEN: Okay. Great.</p> <p>13 JIM STERN,</p> <p>14 called as a witness herein, having been first duly</p> <p>15 sworn, was examined and testified as follows:</p> <p>16 EXAMINATION</p> <p>17 BY MR. RAGEN:</p> <p>18 Q. Can you please state your name?</p> <p>19 A. My name is Jim Stern, S-t-e-r-n.</p> <p>20 Q. And currently you're a sergeant with the</p> <p>21 Countryside Police Department?</p> <p>22 A. Yes, that's correct.</p> <p>23 Q. And did you just get off your shift</p> <p>24 shortly?</p>
<p style="text-align: right;">Page 6</p> <p>1 provides the backside of a log that was talked</p> <p>2 about in Soak's dep, and that will be talked about</p> <p>3 in this dep. And I believe the parties agree to</p> <p>4 stipulate to the authenticity of that document.</p> <p>5 MR. CATANIA: So stipulated for the sheriff.</p> <p>6 MR. FLAXMAN: So stipulated for the plaintiff.</p> <p>7 MR. RAGEN: I think we identified the documents</p> <p>8 with, you know --</p> <p>9 MR. FLAXMAN: Yeah, I think it's -- Bill, I</p> <p>10 just want to make sure that Sergeant Stern hears</p> <p>11 this. I believe so.</p> <p>12 THE WITNESS: I can hear you. Thank you. Can</p> <p>13 you hear me?</p> <p>14 MR. FLAXMAN: We can hear you. Are we done</p> <p>15 with the preliminaries, Bill?</p> <p>16 MR. RAGEN: Yeah does anyone else think we need</p> <p>17 any other stipulations, John, Frank, Joel?</p> <p>18 MR. FLAXMAN: Not at this time. Why don't we</p> <p>19 go off the record and make sure we can get started?</p> <p>20 MR. RAGEN: Yep.</p> <p>21 (WHEREUPON, a discussion</p> <p>22 was had off the record.)</p> <p>23 (WHEREUPON, the witness was</p> <p>24 duly sworn.)</p>	<p style="text-align: right;">Page 8</p> <p>1 A. You cut off there.</p> <p>2 Q. I'm sorry.</p> <p>3 Did you just get off your shift in the</p> <p>4 last hour?</p> <p>5 A. I did.</p> <p>6 Q. And so what was that shift?</p> <p>7 A. That's our night shift. We work 6:00 p.m.</p> <p>8 to 6:00 a.m.</p> <p>9 Q. So I think I can speak for all of us. We</p> <p>10 appreciate that you are able to sit for this</p> <p>11 deposition, A, when you're not on the clock and, B,</p> <p>12 when you probably would really prefer to be</p> <p>13 sleeping.</p> <p>14 A. No problem. It's part of the job, but</p> <p>15 thank you.</p> <p>16 Q. We're here to talk about -- oh, so how</p> <p>17 long have you worked for Countryside Police</p> <p>18 Department?</p> <p>19 A. Coming up on it'll be 14 years in January.</p> <p>20 Q. Okay. We're gonna talk about your role in</p> <p>21 handling, you know, a case that involved Angel Cruz</p> <p>22 that occurred in March 2016. What was your role --</p> <p>23 A. I'm sorry. You cut out again.</p> <p>24 Q. Oh, really?</p>

<p style="text-align: right;">Page 9</p> <p>1 What was your role in March 2016?</p> <p>2 A. At that time I was assigned -- I was an</p> <p>3 investigator assigned to the detective division.</p> <p>4 So on this incidence I was contacted by the patrol</p> <p>5 officers that initially responded to the scene, and</p> <p>6 I took over that case once I arrived.</p> <p>7 Q. Okay. Do you remember this case?</p> <p>8 A. Yes.</p> <p>9 Q. And what do you remember about it?</p> <p>10 A. It was a violent domestic that occurred</p> <p>11 between a mother and a son and the stepfather.</p> <p>12 Q. Okay. Do you recall anything else?</p> <p>13 A. In regards to the domestic, yeah, there</p> <p>14 was a knife involved. Both the victims had been</p> <p>15 stabbed by the son, Angel Cruz Junior, and were</p> <p>16 transported to the hospital with injuries.</p> <p>17 Q. You've been provided a copy of the</p> <p>18 Countryside Police Department records in this case?</p> <p>19 A. Yes.</p> <p>20 Q. And let's see here. I want to make</p> <p>21 sure -- there's been a couple different copies. I</p> <p>22 want to make sure I get the one that was</p> <p>23 Bates-stamped, so give me a second while I pull it</p> <p>24 up.</p>	<p style="text-align: right;">Page 11</p> <p>1 and maybe more, but --</p> <p>2 A. I believe it was just one.</p> <p>3 Q. Okay. Yeah. And that's on Pages 9 and</p> <p>4 10. I'll scroll to them. I'll start at the back</p> <p>5 of it so you can see it's yours.</p> <p>6 We're now looking at Countryside 0010, and</p> <p>7 it appears that you wrote a report on March 12,</p> <p>8 2016, at 16:27?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And it finishes on Page 10, but</p> <p>11 starts on Page 9?</p> <p>12 A. Correct.</p> <p>13 Q. And in the paragraph, I'm looking down,</p> <p>14 it's like the fourth or fifth paragraph, it starts,</p> <p>15 I then proceeded to La Grange? Adventis Memorial</p> <p>16 Hospital, do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And then that whole paragraph describes</p> <p>19 the incident between Angel Cruz, Leticia Vargas and</p> <p>20 Joel Castillo, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And all the information that comes after</p> <p>23 the sentence, I then proceeded to La Grange</p> <p>24 Adventis Memorial Hospital, and then before it</p>
<p style="text-align: right;">Page 10</p> <p>1 Okay. This was a password-protected</p> <p>2 document that was Bates-stamped Countryside 001 all</p> <p>3 the way to Countryside 0057; is that correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. I'm going to -- okay. I'm sorry</p> <p>6 about that. I'm gonna share the screen so we can</p> <p>7 kind of look at it at the same time.</p> <p>8 For the record, right now we're sharing my</p> <p>9 screen, and we're looking at the document we were</p> <p>10 talking about moments ago which is the Countryside</p> <p>11 Police Department record for Angel Cruz?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And you can see, I'm looking at the</p> <p>14 first page. It says Countryside 001 on it. You</p> <p>15 caused a number of -- as you can see the way this</p> <p>16 record is set up, there are a number of</p> <p>17 individual -- I'm scrolling down. I apologize.</p> <p>18 It's taking a while.</p> <p>19 There are a number of different reports,</p> <p>20 and at the end of them it lists who the reporting</p> <p>21 officer is; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. And so looking through the report it</p> <p>24 appears that you caused one report to be entered</p>	<p style="text-align: right;">Page 12</p> <p>1 says, assigned consent to search form near the</p> <p>2 bottom was placed in the file, everything between</p> <p>3 that came from what Miss Vargas told you; is that</p> <p>4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. I also want to turn to Page 10. If you</p> <p>7 look at right above where it, you know, provides</p> <p>8 your, you know, not signature, but shows where you</p> <p>9 are the reporting officer, the last sentence, last</p> <p>10 paragraph, it reads, I then proceeded back to</p> <p>11 La Grange Adventis Memorial Hospital to speak with</p> <p>12 Leticia. Leticia advised that she was being</p> <p>13 released from the hospital shortly. I explained to</p> <p>14 Leticia that we would need to speak with her</p> <p>15 further about the incident which she advised after</p> <p>16 she visited Joel at the hospital she visited the</p> <p>17 police department. Do you see that?</p> <p>18 A. Yes.</p> <p>19 Q. So Leticia had mentioned to you that she</p> <p>20 was planning on visiting Joel Castillo at the</p> <p>21 hospital?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know if she ever advised you that</p> <p>24 she was going to visit Angel Cruz?</p>

Page 13

1 A. I don't recall.
 2 Q. Okay. If we turn to Page 8 of this
 3 document, and we're still on screen sharing. So do
 4 you see that this is a report issued by Ryan Venem?
 5 A. Yes.
 6 Q. And did it appear that this report was
 7 issued in the common practice as what you'd expect
 8 for a reporting officer for the Countryside Police
 9 Department report?
 10 A. Yes. Supplemental narrative is quite
 11 common in a case.
 12 Q. Thank you.
 13 And is this something that you would have
 14 relied on if you, you know, in providing -- would
 15 you have relied on this report?
 16 A. At some point, yes.
 17 Q. So this -- on this page it indicates that
 18 on March 14, 2016, Angel Cruz -- well, take a
 19 second and read that first paragraph.
 20 A. Okay.
 21 Q. And so that first paragraph, does that
 22 indicate that on March 14, 2016, at approximately
 23 06:00 hours Mr. Cruz was placed into four-point
 24 restraints?

Page 14

1 A. Yes.
 2 Q. And the fact that he was placed into
 3 four-point restraints, would that --
 4 A. You're cutting out.
 5 Q. So the fact that it indicates that
 6 Mr. Cruz was placed in four-point restraints, does
 7 that mean that shortly before that he was not in
 8 any restraints?
 9 MR. FLAXMAN: Objection, foundation.
 10 BY MR. RAGEN:
 11 Q. You can answer.
 12 A. It appears that he was handcuffed at the
 13 time prior to being placed in the four-point
 14 restraints.
 15 Q. Okay. Right. And then so as you can tell
 16 it's a narrative, so it starts at indicating that
 17 he was handcuffed to his hospital bed, correct?
 18 A. Yes.
 19 Q. And that's the -- why you say that that
 20 was the -- his condition in terms of restraints
 21 before he was placed in the four-point restraints;
 22 is that correct?
 23 A. Yes.
 24 Q. And then it shows that at approximately

Page 15

1 8:30 a.m. on March 14, 2016, Mr. Cruz was
 2 discharged from Hinsdale Hospital and transported
 3 to Countryside Police Department?
 4 A. Yes.
 5 Q. Okay. And do you know if you were working
 6 on March 14, 2016?
 7 A. Yes, I was I believe. I think we
 8 conducted a few interviews that day.
 9 Q. Okay. And you would have been at the
 10 Countryside Police Department at that time?
 11 A. I don't know if I was there at that exact
 12 time that he -- Mr. Cruz was brought back to the
 13 police department, but at some point I was.
 14 Q. Yeah, that was my --
 15 MR. FLAXMAN: Bill, I think we lost you. I
 16 think you cut out for a moment.
 17 MR. RAGEN: If this continues I guess maybe
 18 I'll go to my phone. I really shouldn't be cutting
 19 out, but thanks for letting me know when I'm
 20 cutting out because I can't tell.
 21 BY MR. RAGE:
 22 Q. So on March 14, 2016, somewhere around
 23 8:30 a.m. is the time that Mr. Cruz was transported
 24 to Countryside Police Department?

Page 16

1 A. Correct.
 2 Q. And at this point in time I'll turn to
 3 that other exhibit which is a -- well, actually,
 4 no, I'll stay here. It's easier. It's gonna take
 5 forever to pull that up.
 6 Okay. So what I'm pulling up is marked
 7 Countryside 0040, correct?
 8 A. Appears so, yes.
 9 Q. Okay. And is this like -- can you tell me
 10 what this document is?
 11 A. That's the standard form that we use upon
 12 an intake of somebody that's in custody at the
 13 police department, and it's used to just document
 14 their condition periodically as they're inside the
 15 cell.
 16 Q. Okay. And on this one it is dated
 17 March 14, March 14, 2016, and the first entry is
 18 08:58 by officer Venem?
 19 A. Correct.
 20 Q. And that's the reporting officer who wrote
 21 that last report we discussed briefly, correct?
 22 A. Correct.
 23 Q. And it says that the time prisoner was
 24 originally placed in the cell was 08:58 a.m.,

<p style="text-align: right;">Page 17</p> <p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And then you can see -- I'm gonna</p> <p>4 scroll through, and we're missing a couple pages.</p> <p>5 I'm sure we will go to the other document, but I</p> <p>6 just want to stay on this one just because it takes</p> <p>7 me long enough to get from one document to another</p> <p>8 virtually.</p> <p>9 But you can see on the left these</p> <p>10 documents that are running time log, and right here</p> <p>11 we have a -- it's a 3-page document, ends at</p> <p>12 Countryside 0042. And the last time entry is 08:36</p> <p>13 again by Officer Venem where Mr. Cruz was</p> <p>14 transported to the Bridgeview Courthouse.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. So it appears that Mr. Cruz was in, you</p> <p>18 know, Countryside Police Department custody for not</p> <p>19 quite 24 hours, but pretty close?</p> <p>20 A. Correct.</p> <p>21 Q. And I don't -- when he was -- now turning</p> <p>22 to -- bounce around here. Okay. Now turn to</p> <p>23 Page Countryside 0036. I'm going to -- and this</p> <p>24 right now you may not -- well, starting at Page --</p>	<p style="text-align: right;">Page 19</p> <p>1 2016?</p> <p>2 A. Yes, absolutely.</p> <p>3 Q. So you'd been made aware that he had</p> <p>4 psychotic symptoms, correct?</p> <p>5 A. Correct.</p> <p>6 Q. You also would have -- I now move to</p> <p>7 Page Countryside 0036 which is further on in the</p> <p>8 document which says in contra diagnoses acute</p> <p>9 febrile illness, homicidal ideation and psychosis?</p> <p>10 Do you see that?</p> <p>11 A. Yes.</p> <p>12 Q. So you guys would have been made aware of</p> <p>13 that as well?</p> <p>14 A. Suicidal ideation, yes.</p> <p>15 Q. Well, it says homicidal ideation?</p> <p>16 A. Yeah, I'm sorry.</p> <p>17 Q. Right. No, I didn't think it was, too, in</p> <p>18 this case. You know, do you know that he expressed</p> <p>19 any suicidal ideations?</p> <p>20 A. Not to my knowledge, no.</p> <p>21 Q. Okay. And you'd have to look at the</p> <p>22 records one way or the other?</p> <p>23 A. Yeah.</p> <p>24 Q. Okay. But here it says homicidal</p>
<p style="text-align: right;">Page 18</p> <p>1 I want to come back to this Countryside 0036. I</p> <p>2 just want to start at the beginning of the record</p> <p>3 so we're all clear what this is.</p> <p>4 So starting on Page Countryside 0032, this</p> <p>5 is a document called the clinical discharge</p> <p>6 summary, and it was created by Adventis Hinsdale</p> <p>7 Hospital, correct?</p> <p>8 A. Yes.</p> <p>9 Q. And is this like the type of document</p> <p>10 you'd expect to receive when you receive a pretrial</p> <p>11 detainee who has been hospitalized before they can</p> <p>12 be processed?</p> <p>13 A. Yeah. Anytime they're released from</p> <p>14 hospital we include the discharge paperwork along</p> <p>15 for the courthouse.</p> <p>16 Q. And it says, if you look at like the</p> <p>17 personal information, it says in the visit reason,</p> <p>18 it says, psychotic symptoms and lactic acidosis?</p> <p>19 A. Yes, I see that here.</p> <p>20 Q. Okay. And then would these -- this</p> <p>21 document, would that have accompanied Mr. Cruz from</p> <p>22 Hinsdale Hospital to the Countryside Police</p> <p>23 Department at the same time he was transferred, you</p> <p>24 know, between -- around 8:30 a.m. on March 14,</p>	<p style="text-align: right;">Page 20</p> <p>1 ideation, correct?</p> <p>2 A. Correct.</p> <p>3 Q. It also say psychosis, correct?</p> <p>4 A. Correct.</p> <p>5 Q. And psychosis is at least as far as it</p> <p>6 goings -- you know, to keep someone in custody,</p> <p>7 it's a serious mental illness?</p> <p>8 MR. FLAXMAN: Object to foundation.</p> <p>9 BY MR. RAGEN:</p> <p>10 Q. You can answer.</p> <p>11 A. Some form of mental illness, yes.</p> <p>12 Q. Okay. And it shows earlier that</p> <p>13 Officer Venem, you know, was apprised or not was</p> <p>14 apprised -- strike that.</p> <p>15 Earlier on Page 8 of this document, and if</p> <p>16 you want we can go back to it, but it shows that</p> <p>17 Mr. Cruz was restrained at Hinsdale Hospital,</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. And that would have been the decision of</p> <p>21 someone at Hinsdale Hospital and not anyone at</p> <p>22 Countryside Police Department, correct?</p> <p>23 MR. FLAXMAN: Objection, foundation.</p> <p>24</p>

Page 21

1 BY MR. RAGEN:
 2 Q. If you know.
 3 A. I would assume. I mean, the police are
 4 not gonna restrain somebody in four-point
 5 restraints. That would be a decision made by the
 6 hospital staff or a doctor.
 7 Q. Right. And so you guys are not trained to
 8 implement four-point restraints, correct?
 9 A. That's correct.
 10 Q. And, you know, you'd -- I think the way
 11 you answered it is perfectly the way it should be
 12 is like a medical or mental health provider you'd
 13 expect the ones to implement four-point restraints?
 14 A. Correct.
 15 Q. And Mr. Cruz was, again going back to the
 16 log, was sent from Countryside Police Department on
 17 March 15 at 08:36; is that correct?
 18 A. Correct.
 19 Q. And so he was with Countryside Police
 20 Department as a pretrial detainee for almost a day,
 21 right?
 22 A. Correct.
 23 Q. And it appears to me that all the care and
 24 treatment he received at Countryside Police

Page 22

1 Department was reasonable. I would take it you
 2 also agree with that?
 3 A. We treated him exceptionally, yes.
 4 Q. Yes. Thank you.
 5 And do you have any policies and
 6 procedures as to how to manage a patient who's got
 7 mental health illness at Countryside Police
 8 Department?
 9 A. We try to increase our observations of the
 10 subjects usually, you know, as often as we can,
 11 usually 15-minute intervals if it allows.
 12 Q. Right. But my point is, you don't have a
 13 written policy and procedure, do you?
 14 A. No, not that I'm aware of.
 15 Q. Ultimately, you know, that's why I wanted
 16 to start with the care -- I mean, the care and
 17 treatment you provided to Mr. Cruz was reasonable,
 18 correct?
 19 A. Absolutely.
 20 Q. At least reasonable. You said
 21 exceptional, and I'm not quibbling but, you know --
 22 and do you have any policies and procedures, you
 23 know, if --
 24 A. Did we lose you?

Page 23

1 Q. No. I'm trying to think of the question.
 2 I appreciate the assist there.
 3 Do you have any nurses on staff that can
 4 evaluate a pretrial detainee who's got psychiatric
 5 issues?
 6 A. No.
 7 Q. Do you guys have a psychiatrist at
 8 Countryside Police Department who is available to
 9 see a patient with psychiatric issues?
 10 A. Unfortunately we do not.
 11 Q. And if someone developed the type of
 12 psychiatric issues that you felt needed some type
 13 of intervention, would you have sent him to another
 14 healthcare or mental health facility?
 15 A. Correct.
 16 Q. Have you done that at times?
 17 A. Yes. Yeah. We would transport them to
 18 whatever appropriate hospital or facility needed to
 19 be.
 20 Q. When you receive information from the
 21 hospital, do you expect that everything you need
 22 about a pretrial detainee has been told to you
 23 that's important?
 24 A. Yes.

Page 24

1 Q. Are you aware anywhere in this report that
 2 or in any other source that Hinsdale Hospital told
 3 you that Mr. Cruz was administered heparin?
 4 A. No, no, sir.
 5 Q. Okay. And besides Mr. Venem's statement
 6 that he observed Mr. Cruz to be restrained, did
 7 Hinsdale hospital advise you that Mr. Cruz was
 8 restrained in any way?
 9 A. No. I had no other contact with the
 10 hospital.
 11 Q. Okay. Did Hinsdale Hospital ever tell you
 12 or anyone at Countryside Police Department that you
 13 can see from this report that he was at risk for
 14 developing a pulmonary embolus?
 15 MR. FLAXMAN: Objection, foundation.
 16 THE WITNESS: No.
 17 BY MR. RAGEN:
 18 Q. Okay. I take it there's no licensed
 19 clinical professional counsel at Countryside Police
 20 Department who can evaluate a pretrial detainee
 21 such as Mr. Cruz for psychiatric issues; is that
 22 correct?
 23 A. Not at our station, no, sir.
 24 Q. And again to the same effect, you know

Page 25

1 that if you feel it's necessary, you can transfer
 2 him to another facility which would likely be a
 3 hospital or a mental health facility that has a
 4 level of meant health or medical care?
 5 A. Yes.
 6 Q. If you look here on Page Countryside 0037,
 7 again, this is a continuation of those Hinsdale
 8 records we were talking about?
 9 A. Sure.
 10 Q. And you can see that here Hinsdale is
 11 indicating that it's discharging Mr. Cruz to law
 12 enforcement/forensics/custody, correct?
 13 A. Yes.
 14 Q. And you're indicating -- it's also -- this
 15 record is also indicating that the patient's
 16 condition at discharge was stable; is that correct?
 17 A. Correct.
 18 Q. In the end can you tell me the charge that
 19 was -- so it says here that you're one of the
 20 prosecuting witnesses in this case. I'm looking at
 21 Countryside 0038.
 22 A. Yes. Detective Sodt was the lead
 23 investigator, and I was assisting him.
 24 Q. Okay. Can you tell me what that means

Page 26

1 when it says you're a prosecuting witness?
 2 A. Just that, you know, we have interviewed
 3 witnesses. There's testimony that we can provide.
 4 You know, we participated in the investigation that
 5 took place.
 6 Q. And then when what was the charge that was
 7 brought against Angel Cruz?
 8 A. The state's attorney approved two counts
 9 of attempted murder against Mr. Cruz.
 10 Q. Okay. And as a prosecuting witness,
 11 that's something that you would have been available
 12 to go to, you know, court and provide evidence in
 13 support of that charge?
 14 A. Yes.
 15 MR. RAGEN: Okay. I have no further questions.
 16 MR. FLAXMAN: I have a few questions.
 17 MR. RAGEN: I'll stop my share.
 18 MR. FLAXMAN: You'll stop your share, okay.
 19 EXAMINATION
 20 BY MR. FLAXMAN:
 21 Q. Sir, my name is Joel Flaxman. I represent
 22 the estate of Mr. Cruz. At the time, the report
 23 that we were looking at, what was your rank at that
 24 time? I'm sorry if I missed that.

Page 27

1 A. I was a detective assigned to the
 2 investigations unit.
 3 Q. And when did you make sergeant?
 4 A. Oh, it's been about two years now, so just
 5 maybe a little -- little while after that case that
 6 had taken place.
 7 Q. And so the last thing that Mr. Ragen asked
 8 you about was the charges against Mr. Cruz.
 9 Do you remember that?
 10 A. Yes.
 11 Q. Okay. So after Mr. Cruz left Countryside,
 12 what's your understanding of where he was taken?
 13 A. After we bring the detainee down --
 14 depending on the day of the week, it would be
 15 either be the Bridgeview Courthouse, the sheriff's
 16 office or down to 26th and California if it was on
 17 the weekend. And then he would go before a judge.
 18 Q. And did you understand that he was later
 19 processed into the Cook County Jail?
 20 A. Yes.
 21 Q. And did you learn that he died after being
 22 processed through the of Cook County Jail?
 23 A. I did learn that at some point, yes.
 24 Q. How did you learn that?

Page 28

1 A. I don't recall if it was from the state's
 2 attorney office that called. I'm not sure.
 3 Q. Okay. Do you remember what you learned
 4 about Mr. Cruz's death?
 5 A. Just that he had passed away while in the
 6 custody of the sheriff's department.
 7 Q. Did the person who told you about that
 8 tell you the cause of the death?
 9 MR. RAGEN: Objection, form, foundation.
 10 THE WITNESS: No.
 11 BY MR. FLAXMAN:
 12 Q. Did you ask what the cause of his death
 13 was?
 14 A. I did not.
 15 Q. What did you mean when you said he was
 16 treated exceptionally while he was at the
 17 Countryside Police Department?
 18 A. Just as we would have treat anybody else
 19 that comes in our doorway, you know, we try to
 20 treat everybody with respect. You know, we don't
 21 abuse people.
 22 Q. Okay. Did you mean that he was treated
 23 better than anybody else who was in custody at the
 24 Countryside Police Department?

<p style="text-align: right;">Page 29</p> <p>1 A. No. We treat everybody fair was my point.</p> <p>2 Q. Okay. That's what I was asking.</p> <p>3 Mr. Ragen asked you about whether you</p> <p>4 learned that Mr. Cruz had been given heparin. Do</p> <p>5 you remember that?</p> <p>6 A. He did ask that, yes.</p> <p>7 Q. Do you know what heparin is?</p> <p>8 A. I do not.</p> <p>9 Q. Mr. Ragen also looked at some medical</p> <p>10 records with you that came from the hospital where</p> <p>11 Mr. Cruz was held before being taken to the</p> <p>12 Countryside Police Department.</p> <p>13 Do you remember that?</p> <p>14 A. Yes.</p> <p>15 Q. Did you look at those records in 2016?</p> <p>16 A. I believe we would have looked at them,</p> <p>17 you know, prior to interviewing Mr. Cruz.</p> <p>18 Q. Okay. Do you have a recollection of</p> <p>19 having done that or are you just relying on your</p> <p>20 practice?</p> <p>21 A. Relying on practice. I mean, this case is</p> <p>22 over, what, four years ago.</p> <p>23 Q. Sure.</p> <p>24 There was also some questioning about</p>	<p style="text-align: right;">Page 31</p> <p>1 the hospital?</p> <p>2 MR. CATANIA: Objection, form.</p> <p>3 THE WITNESS: If somebody's in custody, then</p> <p>4 they should be in handcuffs, but there obviously</p> <p>5 are situations that would prevent that sometimes</p> <p>6 from happening.</p> <p>7 BY MR. FLAXMAN:</p> <p>8 Q. You mean if there's a treatment need they</p> <p>9 wouldn't --</p> <p>10 A. Treatment need or injury or something that</p> <p>11 would prevent that from being . . .</p> <p>12 Q. Let me show you one more document, and</p> <p>13 then I will be done.</p> <p>14 All right. Can you see on your screen a</p> <p>15 copy of that prison log you looked at before?</p> <p>16 A. I can.</p> <p>17 Q. Okay. And I will scroll down for the</p> <p>18 record. You see at the bottom we put a page number</p> <p>19 on it that says Countryside PD 9/4/20 0002?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Mr. Ragen asked you a little bit</p> <p>22 about this. The first thing on here is an entry</p> <p>23 that says checked by V-e-n-e-m. Do you see that?</p> <p>24 A. No, sir. Where are you at.</p>
<p style="text-align: right;">Page 30</p> <p>1 Mr. Cruz being restrained at the hospital.</p> <p>2 Do you remember that?</p> <p>3 A. Yes.</p> <p>4 Q. And you talked about something called</p> <p>5 four-point restraints; is that right?</p> <p>6 A. Yes.</p> <p>7 Q. What are four-point restraints?</p> <p>8 A. Typically it's a restraint that the</p> <p>9 hospital staff has on hand, you know, if they need</p> <p>10 to restrain somebody for their safety or the</p> <p>11 patient's safety. It would be basically a strap</p> <p>12 that would secure their legs and also their hands</p> <p>13 or wrists.</p> <p>14 Q. Is that something that's ever used at the</p> <p>15 Countryside Police Department?</p> <p>16 A. We don't have those, sir.</p> <p>17 Q. When a person in custody of the</p> <p>18 Countryside Police Department is taken to the</p> <p>19 hospital, are they kept in handcuffs while they're</p> <p>20 being treated at the hospital?</p> <p>21 A. I guess that would depend on the</p> <p>22 situation.</p> <p>23 Q. So there's not a uniform policy for</p> <p>24 somebody in police custody who's being treated at</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Sorry. I can make it a little bigger.</p> <p>2 I'm just look looking at the first entry with the</p> <p>3 time of 08:58.</p> <p>4 A. Okay.</p> <p>5 Q. And there's a name in the box for checked</p> <p>6 by?</p> <p>7 A. Yes. Okay. Now I see it.</p> <p>8 Q. Okay. Does the name in the box for check</p> <p>9 by mean that Officer Venem is the one who made that</p> <p>10 entry?</p> <p>11 A. No, it does not. Typically the person</p> <p>12 filling out this form would be our CSO's we call</p> <p>13 them, community service officers, and that's the</p> <p>14 person that's tasked with monitoring the cameras.</p> <p>15 And they'll document any interaction an officer or</p> <p>16 another individual has with a person in custody.</p> <p>17 Q. How would you figure out who the CSO is</p> <p>18 who made these entries?</p> <p>19 A. I suppose we would have to go back into</p> <p>20 their, you know, their personnel records and see</p> <p>21 who was working that day. But typically we're a</p> <p>22 small department. We can kind of tell based on</p> <p>23 handwriting who it would have been.</p> <p>24 Q. Do you know whose handwriting it is on</p>

<p style="text-align: right;">Page 33</p> <p>1 this form?</p> <p>2 A. At the top?</p> <p>3 Q. Sure.</p> <p>4 A. That actually looks like Officer Venem's</p> <p>5 handwriting in the first box and then CSO Little</p> <p>6 John's documentation on the end.</p> <p>7 Q. So did I understand right that the entry</p> <p>8 at 8:58 looks like it was made by Officer Venem?</p> <p>9 A. Yes.</p> <p>10 Q. And I'm now -- I think you should be able</p> <p>11 to see the rest of the entries on this first page.</p> <p>12 Does it look like those other entries were made by</p> <p>13 CSO Little John?</p> <p>14 A. Yes.</p> <p>15 Q. And what I'll do is go to the next page.</p> <p>16 We're on -- this one's marked</p> <p>17 Countryside PD 9/4/20 0003. Can you tell which who</p> <p>18 made the entries on this page?</p> <p>19 A. Looks like there's a few different people.</p> <p>20 If you want to point to one specifically, I can try</p> <p>21 to help you, but . . .</p> <p>22 Q. Well, how about let's start -- what's the</p> <p>23 one? Can you tell that one?</p> <p>24 A. Little John, so that would have been</p>	<p style="text-align: right;">Page 35</p> <p>1 entries from 19:45 to 22:45?</p> <p>2 A. Yes, it appears that way.</p> <p>3 Q. Okay. And do you know who made the</p> <p>4 entries starting at 23:00 hours?</p> <p>5 A. I can try to pronounce her name, but I</p> <p>6 know I'll have arm hard time.</p> <p>7 Q. Feel free to spell it?</p> <p>8 A. Which is terrible, I work with her.</p> <p>9 CSO Hervieux.</p> <p>10 Q. And that H-e-r-v-i-e-u-x?</p> <p>11 A. That's correct. Yes.</p> <p>12 Q. What is that CSO 's first name?</p> <p>13 A. Nicole.</p> <p>14 Q. And are the entries on this page from 2:00</p> <p>15 hours to 01:00 hours appear to be made by</p> <p>16 CSO Hervieux?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And I'm gonna go to Page 4 of 5</p> <p>19 which we marked Countryside PD 9/4/20 0005. Are</p> <p>20 the entries on these page, excuse me, are the</p> <p>21 entries on this page also appear to be made by</p> <p>22 CSO Hervieux.</p> <p>23 A. It appears that way. Yes.</p> <p>24 MR. POWER: Apologies, Joel. I have another</p>
<p style="text-align: right;">Page 34</p> <p>1 CSO Little John. That's her documenting her own</p> <p>2 observation of Mr. Cruz.</p> <p>3 Q. Okay. And what's CSO Little John's first</p> <p>4 name?</p> <p>5 A. Patricia.</p> <p>6 Q. Is she still employed at the Countryside</p> <p>7 Police Department?</p> <p>8 A. Yes.</p> <p>9 Q. Can you tell whose handwriting is on the</p> <p>10 next line 13:59?</p> <p>11 A. Looks the same.</p> <p>12 Q. What about the line at 14:13?</p> <p>13 A. I would assume it would be her all the way</p> <p>14 up to 15:15.</p> <p>15 Q. Okay. And then who is that at 15:15?</p> <p>16 A. That would have been CSO Elizabeth</p> <p>17 Cordova.</p> <p>18 Q. Okay. And starting at 15:15 going to the</p> <p>19 bottom of the page, does that appear to be entries</p> <p>20 by CSO Cordova?</p> <p>21 A. Yes.</p> <p>22 Q. I'm now on the next page which is Page 3 of</p> <p>23 5 of the log. It's marked as Page 0004 on this</p> <p>24 document. Does it appear that CSO Cordova made the</p>	<p style="text-align: right;">Page 36</p> <p>1 call to jump on. For the record, this is John</p> <p>2 Power. I'm getting off this call. I might be back</p> <p>3 later.</p> <p>4 BY MR. FLAXMAN:</p> <p>5 Q. I'm now on page 5 of 5 Countryside</p> <p>6 9/4/20 006. Do the entries on this page from 07:49</p> <p>7 to 06:49 appear to be made by CSO Hervieux?</p> <p>8 A. Yes.</p> <p>9 Q. Can you read the last entry that's made by</p> <p>10 CSO Hervieux which is timed 6:49 in the check by</p> <p>11 box? It says Hervieux and then slash, and there's</p> <p>12 another name?</p> <p>13 A. Goluszka would have been an officer at the</p> <p>14 time. He's since retired.</p> <p>15 Q. What's officer Goluszka's first name?</p> <p>16 A. Kenneth.</p> <p>17 Q. And why would somebody put two names in</p> <p>18 that box?</p> <p>19 A. Could be a possibility that the officer</p> <p>20 was in that same room with her during the time she</p> <p>21 was making the observation or he could have been in</p> <p>22 the area of Mr. Cruz in the actual lockup itself.</p> <p>23 Q. Okay. It looks like different handwriting</p> <p>24 made the entry at 07:05. Do you see that?</p>

<p style="text-align: right;">Page 37</p> <p>1 A. Yeah. It looks like CSO Little John's 2 handwriting again. 3 Q. And are the entries at 07:13 and 07:30 4 also made by Little John? 5 A. It looks like it, yes. 6 Q. Okay. And then at 07:44 can you tell 7 whose entry that is? 8 A. Looks like hers as well. 9 Q. Little John's right? 10 A. Yes. 11 Q. Okay. And same for 08:00 and 08:13? 12 A. Yes. 13 Q. What about 08:28, can you tell whose entry 14 that is? 15 A. It's tough, but I would assume it would be 16 her. I mean, she normally work at that time, so it 17 would be reasonable to assume that. 18 Q. And by her you mean Little John, right? 19 A. Yes. 20 Q. And would you assume 8:36 is also 21 Little John's entry? 22 A. Yes. 23 MR. FLAXMAN: I don't have any other questions. 24 Thanks for your time.</p>	<p style="text-align: right;">Page 39</p> <p>1 not me that described that event -- 2 Q. I understand that. 3 A. But yes. 4 Q. In that same section of the report on 5 Page 8 where somebody was describing the reason for 6 being placed in four-point restraints, that 7 documented the reason as being he tried to get out 8 of his cuffs; is that right? 9 A. Yes. 10 Q. So he was doing something to defeat the 11 security placed on him while he was in custody, and 12 that's one of the reasons why medical staff 13 determined to put him new four-point restraints; is 14 that correct? 15 MR. FLAXMAN: Objection, foundation. 16 THE WITNESS: Absolutely sounds like it. 17 MR. RAGEN: I join in that objection. 18 MR. CATANIA: Thank you. 19 BY MR. CATANIA: 20 Q. The police department was -- brought him 21 to the hospital for care and treatment in the first 22 instance; is that right? 23 A. Yes. 24 Q. And then the police department was granted</p>
<p style="text-align: right;">Page 38</p> <p>1 THE WITNESS: Thank you. 2 EXAMINATION 3 BY MR. CATANIA: 4 Q. I just have a couple of questions. This 5 is ASA Frank Catania. Sergeant you were asked 6 questions earlier about a conversation you recorded 7 in the report with Miss Leticia Vargas. 8 Do you remember the kind of questions 9 about that? 10 A. The initial interview in the hospital? 11 Q. Yes. 12 A. Yes. 13 Q. Okay. You described in that section of 14 your report Angel Cruz Junior as the subject of 15 that investigation, the man that was in custody, 16 right? 17 A. Correct. 18 Q. Did you ever speak with Angel Cruz Senior? 19 A. No. 20 Q. Okay. On Page 8 of the report you were 21 describing how he was placed in four-point 22 restraints. You describe that as something that 23 the hospital did; is that right? 24 A. That was not me. Just to clarify that was</p>	<p style="text-align: right;">Page 40</p> <p>1 custody back and took him to the police station 2 after being examined and treated by physicians and 3 nurses and physician assistants; is that right? 4 A. Yes. 5 Q. In your experience has it ever occurred 6 where you've brought someone to the hospital, and 7 they have not been returned to police custody? 8 A. Can you say that again? I'm sorry. 9 Q. Sure. 10 In your experience have you ever had a 11 situation where some arrestee was brought to a 12 hospital and then not returned to police department 13 custody; is that right? 14 A. In cases of serious injury, but it's 15 pretty rare. 16 Q. Okay. So but that has happened; is that 17 right? 18 A. Yeah, yeah. 19 Q. In this instance the hospital discharged 20 the patient; is that right? 21 A. That's correct. 22 Q. So would you conclude from that that he 23 was not in serious medical or mental distress at 24 the time when he was returned to police custody?</p>

<p style="text-align: right;">Page 41</p> <p>1 MR. FLAXMAN: Objection, foundation. 2 THE WITNESS: A hundred percent, yes. 3 BY MR. CATANIA: 4 Q. So you relied on the hospital to only 5 release somebody who was fit to be released to 6 police custody; is that right? 7 A. Correct. 8 MR. CATANIA: No further questions. 9 FURTHER EXAMINATION 10 BY MR. RAGEN: 11 Q. I just have a few and again my technical 12 difficulties may take a second for me to bring it 13 up. Okay. While I'm pulling it up, can you tell 14 me what a CSO is? I know you answered it in part a 15 little bit. 16 A. No problem. 17 Q. Yeah. 18 A. A CSO is a community service officer. 19 It's a civilian position. We use them to do a 20 number of tasks, but one of them in particular is 21 to monitor anybody that's in custody in our holding 22 facility as well as put together court paperwork 23 and things of that nature that need to go down to 24 court.</p>	<p style="text-align: right;">Page 43</p> <p>1 you assume that a CSO is not required to have any 2 training in psychology? 3 A. Correct. 4 Q. Same question as to psychiatry, would you 5 assume that a CSO does not need to -- is not 6 required to have any training in psychiatry? 7 A. Yes. 8 MR. RAGEN: Okay. I'm going to try to do that 9 thing where I screen share. Let's hope this goes 10 all right. I'll turn to you to -- we looked at a 11 couple of iterations of this document. So for the 12 court reporter, I'm going to email you the 57-page 13 Bates-stamped document. We'll mark it as 14 Exhibit A. And then this document that we're 15 looking at and you can see it says the Bates is 16 Countryside PD 9/4/20. This particular page is 17 004, but I believe it's an 8-page document. I'll 18 email that to you, and we'll mark that Exhibit 2, 19 if that's okay. 20 (WHEREUPON, Exhibit No. 1 and 2 21 were marked for identification.) 22 BY MR. RAGEN: 23 Q. I want to go through a couple of these 24 entries. It appears that 2:10 CSO Hervieux is</p>
<p style="text-align: right;">Page 42</p> <p>1 Q. Are you aware of what type of level or 2 training someone has to acquire to become a CSO? 3 A. No, I don't. 4 Q. Okay. Who would know if we wanted to ask 5 someone what level -- I mean, do you have any idea 6 of like say, for example, Miss Little John, do you 7 know what level of education she's obtained? 8 A. I don't. I would probably point you to 9 the direction of the human resources person, but, 10 you know, obviously everybody's background checked 11 and all of that. So I would assume at least a high 12 school diploma, but I could be wrong. 13 Q. Okay. And you do you have any 14 understanding one way or the other whether a CSO 15 has any medical training? 16 A. No. 17 Q. Would you assume that they don't have any 18 medical training; is that fair? 19 A. Yes, that's fair. 20 Q. Okay. Same thing for mental health 21 training, would you assume that a CSO doesn't need 22 to have any particular mental health education? 23 A. I would agree, yes. 24 Q. Okay. Same thing from psychology, would</p>	<p style="text-align: right;">Page 44</p> <p>1 saying that Mr. Cruz is standing on the toilet with 2 hands on top bunk? 3 A. Okay. Yes. 4 Q. And then after at 2:18 Hervieux mentions 5 Mr. Cruz is using the bunk mattress, the top bunk 6 mattress to hide? 7 A. Uh-huh. 8 Q. And Hervieux decided to put -- I'm looking 9 at the left side, from 2:00 -- well, from 2:10 to 10 2:22 there are four different entries for 11 Mr. Cruz's condition? 12 A. Uh-huh. 13 Q. And does it appear that he as you can see 14 was acting abnormally? 15 A. She obviously indicated that he was -- his 16 behavior was strange enough for her to document 17 that on the form, yeah. 18 Q. Okay. And then at 2:45 Hervieux indicates 19 that Mr. Cruz won't move from under the bunk? 20 A. Yes. I see that. 21 Q. And then two minutes later, 2:47, Cruz, 22 this is an entry by Hervieux, that he did move from 23 under the bunk and now standing? 24 A. Uh-huh.</p>

<p style="text-align: right;">Page 45</p> <p>1 Q. At 2:50, now this would be Officer Durell 2 told Angel to put the mattress down? 3 A. Uh-huh. 4 Q. Is that correct? 5 A. Yes. 6 Q. And the only reason in we understand 7 uh-huh or uh-uh but -- 8 A. I'm sorry. 9 Q. It's okay. It's all right. It's the 10 first time you did it. 11 And at 3:18 a.m. Mr. Cruz indicated, I'm 12 sorry, Hervieux indicated Mr. Cruz is drawing on 13 the wall. 14 A. Yes. 15 Q. Would he have had any like writing 16 implements in there? Would you know one way or the 17 other? 18 A. No, he would not. 19 Q. So that's why perhaps it's in -- 20 A. In quotes. 21 Q. -- quotes? 22 Sorry. I don't know if I cut out. 23 A. Yes, yes. 24 Q. Okay. So that would be probably why</p>	<p style="text-align: right;">Page 47</p> <p>1 again. 2 MR. CATANIA: His camera's off anyway. 3 THE WITNESS: I guess we lost him. 4 MR. CATANIA: Looks like it. 5 MR. FLAXMAN: Give him a minute to log back on. 6 (WHEREUPON, a discussion was had 7 off the record.) 8 (WHEREUPON, the record was read 9 as requested.) 10 MR. RAGEN: That might have been like the 11 last -- I'll go back there. I appreciate that. 12 Thank you very much. 13 BY MR. RAGEN: 14 Q. Yeah, okay. And then all those entries we 15 just went through, those are entries made onto the 16 officer log to assess how the pretrial detainee is 17 doing. In this case it's for Angel Cruz on March 18 14 and 15; is that correct? 19 A. Yes. 20 MR. RAGEN: That is all I have. 21 MR. FLAXMAN: I have nothing else from me. 22 MR. CATANIA: No questions from the sheriff. 23 Thank you. 24 MR. RAGEN: So you can either decide to waive</p>
<p style="text-align: right;">Page 46</p> <p>1 Hervieux wrote drawing in quotes? 2 A. That would be my assumption, yeah. 3 Q. Okay. And then at 3:27 a.m. Hervieux 4 wrote that Mr. Cruz is asking for mom to bail him 5 out? 6 A. Correct. 7 Q. And I don't -- I don't know. But I don't 8 know if he was available to be bailed out at that 9 time; is that fair? 10 A. Yes. 11 Q. At 3:38 a.m., Mr. Cruz is dancing and/or 12 running in place? 13 A. Correct. 14 Q. He at 5:53 he's making grunting and 15 yelling noises? 16 A. Correct. 17 Q. And at 6:08 a.m. he's standing in holding 18 cell -- no. He's standing and holding the cell 19 bars? 20 A. Correct. 21 Q. At 6:19 a.m. he's hiding behind a bunk 22 mattress? 23 A. Yes. 24 MR. FLAXMAN: I think Bill might be frozen</p>	<p style="text-align: right;">Page 48</p> <p>1 signature in this case or you can look at it and 2 then, you know, correct any typographical errors 3 that you think Raelene would make which she would 4 never. You'll waive? 5 THE WITNESS: Yes. 6 MR. RAGEN: Okay. Sergeant Stern, we can go off 7 the record. 8 FURTHER DEPONENT SAITH NAUGHT. 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24</p>

Page 49

1 STATE OF ILLINOIS)
 2) SS:
 3 COUNTY OF C O O K)
 4 I, RAELENE STAMM, Certified Shorthand
 5 Reporter, licensed by the State of Illinois, do
 6 hereby certify that heretofore, to-wit, on the 11th
 7 day of September 2020, personally appeared before
 8 me JIM STERN, a witness in a certain cause now
 9 pending and undetermined in the United States
 10 District Court, Northern District of Illinois,
 11 Eastern Division, wherein LETICIA VARGAS, et al.,
 12 is the Plaintiff and COOK COUNTY SHERIFF, et al.,
 13 are the Defendants.
 14 I further certify that the said JIM STERN
 15 was by me first duly sworn to testify the truth,
 16 the whole truth, and nothing but the truth in the
 17 cause aforesaid; that the testimony then given by
 18 said witness was reported stenographically by me in
 19 the presence of said witness and afterwards reduced
 20 to typewriting by Computer-Aided Transcription, and
 21 the foregoing is a true and correct transcript of
 22 the testimony so given by said witness as
 23 aforesaid.
 24 I further certify that the signature to

Page 50

1 the foregoing deposition was waived by counsel for
 2 the respective parties.
 3 I further certify that the taking of this
 4 deposition was pursuant to Notice and that there
 5 were present at the deposition the attorneys
 6 hereinbefore mentioned.
 7 I further certify that I am not counsel
 8 for nor in any way related to the parties to this
 9 suit, nor am I in any way interested in the outcome
 10 thereof.
 11 IN TESTIMONY WHEREOF: I have hereunto set
 12 my hand this 7th day of October, 2020.

13
 14
 15
 16
 17 _____
 18 CERTIFIED SHORTHAND REPORTER
 19
 20
 21
 22
 23
 24

Transcript Word Index

[0002 - actual]

0	08:58 16:18,24 32:3	2020 1:16 49:7 50:12	6:49 36:10
0002 31:19	084-004445 1:24	22:45 35:1	60602 2:13,22
0003 33:17	1	23:00 35:4	60604 2:6
0004 34:23	1 3:13 43:20	24 17:19	7
0005 35:19	10 11:4,10 12:6	26 3:5	7 3:4
001 10:2,14	11th 1:16 49:6	26th 27:16	7th 50:12
0010 11:6	12 11:7	3	8
0032 18:4	13:59 34:10	3 17:11	8 5:19 13:2 20:15 38:20 39:5 43:17
0036 17:23 18:1 19:7	14 8:19 13:18,22 15:1,6,22 16:17,17 18:24 47:18	3:18 45:11	8:00 1:17
0037 25:6	14:13 34:12	3:27 46:3	8:30 15:1,23 18:24
0038 25:21	15 21:17 22:11 47:18	3:38 46:11	8:36 37:20
004 43:17	15:15 34:14,15,18	302 2:12	8:58 33:8
0040 16:7	16:27 11:8	312 2:7	9
0042 17:12	18 1:6	38 3:6	9 11:3,11
0057 10:3	1865 1:6	4	9/4/20 31:19 33:17 35:19 36:6 43:16
006 36:6	19:45 35:1	41 3:4	95 4:16
01:00 35:15	2	427-3200 2:7	a
06:00 13:23	2 3:14 43:18,20	43 3:13,14	a.m. 1:17 8:8 15:1,23 16:24 18:24 45:11 46:3,11,17,21
06:49 36:7	2:00 35:14 44:9	4of 35:18	able 8:10 33:10
07:05 36:24	2:10 43:24 44:9	5	abnormally 44:14
07:13 37:3	2:18 44:4	5 34:23 35:18 36:5,5	absolutely 19:2 22:19 39:16
07:30 37:3	2:22 44:10	5:53 46:14	abuse 28:21
07:44 37:6	2:45 44:18	50 2:21	accompanied 18:21
07:49 36:6	2:47 44:21	57 4:20,23 5:22 43:12	acidosis 18:18
08:00 37:11	2:50 45:1	58 4:18	acquire 42:2
08:13 37:11	200 2:5	6	acting 44:14
08:28 37:13	2016 8:22 9:1 11:8 13:18,22 15:1 15:6,22 16:17 19:1 29:15	6:00 8:7,8	actual 36:22
08:36 17:12 21:17		6:08 46:17	
		6:19 46:21	

[acute - clarify]

acute	apprised	b	c
19:8	20:13,14	back	california
addendum	appropriate	11:4 12:10 15:12 18:1	27:16
4:16	23:18	20:16 21:15 32:19 36:2	call
administered	approved	40:1 47:5,11	32:12 36:1,2
24:3	26:8	background	called
advertis	approximately	42:10	1:11 7:14 18:5 28:2 30:4
11:15,24 12:11 18:6	13:22 14:24	backside	cameras
advise	area	6:1	32:14
24:7	36:22	bail	camera's
advised	arm	46:4	47:2
12:12,15,23	35:6	bailed	care
aforesaid	arrestee	46:8	21:23 22:16,16 25:4 39:21
49:17,23	40:11	bars	case
ago	arrived	46:19	5:11 8:21 9:6,7,18 13:11
10:10 29:22	9:6	based	19:18 25:20 27:5 29:21
agree	asa	32:22	47:17 48:1
6:3 7:10,11 22:2 42:23	38:5	basically	cases
agreed	asked	5:24 30:11	40:14
7:4	27:7 29:3 31:21 38:5	bates	castillo
aided	asking	4:24 9:23 10:2 43:13,15	5:5 11:20 12:20
49:20	29:2 46:4	bed	catania
al	assess	14:17	2:19 3:6 4:3,20,22 5:2,9 6:5
1:4,7 49:11,12	47:16	beginning	7:11 31:2 38:3,5 39:18,19
allows	assigned	18:2	41:3,8 47:2,4,22
22:11	9:2,3 12:1 27:1	behalf	cause
angel	assist	2:8,15,24 7:10,11	28:8,12 49:8,17
8:21 9:15 10:11 11:19	23:2	behavior	caused
12:24 13:18 26:7 38:14,18	assistants	44:16	10:15,24
45:2 47:17	40:3	believe	cell
answer	assisting	4:17 5:14 6:3,11 7:3 11:2	16:15,24 46:18,18
14:11 20:10	25:23	15:7 29:16 43:17	center
answered	assume	better	2:12
21:11 41:14	21:3 34:13 37:15,17,20	28:23	certain
anybody	42:11,17,21 43:1,5	bigger	49:8
28:18,23 41:21	assumption	32:1	certified
anytime	46:2	bill	1:14 49:4 50:17
18:13	attached	6:9,15 15:15 46:24	certify
anyway	4:14	bit	49:6,14,24 50:3,7
47:2	attempted	31:21 41:15	charge
apologies	26:9	bottom	25:18 26:6,13
35:24	attorney	12:2 31:18 34:19	charges
apologize	2:18 26:8 28:2	bounce	27:8
10:17	attorneys	17:22	check
appear	2:10 50:5	box	32:8 36:10
13:6 34:19,24 35:15,21	authenticity	32:5,8 33:5 36:11,18	checked
36:7 44:13	4:5 5:1,7 6:4	bridgeview	31:23 32:5 42:10
appearances	available	17:14 27:15	chicago
2:1	23:8 26:11 46:8	briefly	2:6,13,22
appeared	avenue	16:21	civil
49:7	2:5	bring	1:12 7:8
appears	aware	27:13 41:12	civilian
10:24 11:7 14:12 16:8	19:3,12 22:14 24:1 42:1	brought	41:19
17:17 21:23 35:2,23 43:24		15:12 26:7 39:20 40:6,11	clarify
appreciate		bunk	38:24
8:10 23:2 47:11		44:2,5,5,19,23 46:21	

[clear - division]

clear 18:3	correct (cont.) 20:3,4,18,19,22 21:8,9,14	cuffs 39:8	deposition 1:10 3:12 4:14 7:4,6 8:11
clinical 18:5 24:19	21:17,18,22 22:18 23:15	currently 7:20	50:1,4,5
clock 8:11	24:22 25:12,16,17 35:11	custody 16:12 17:18 20:6 25:12	depositions 1:14
close 17:19	38:17 39:14 40:21 41:7	28:6,23 30:17,24 31:3	describe 38:22
coming 8:19	43:3 45:4 46:6,13,16,20	32:16 38:15 39:11 40:1,7	described 38:13 39:1
common 13:7,11	47:18 48:2 49:21	40:13,24 41:6,21	describes 11:18
community 32:13 41:18	counsel 4:2 5:21 24:19 50:1,7	cut 8:1,23 15:16 45:22	describing 38:21 39:5
computer 49:20	countryside 4:5 5:13 7:21 8:17 9:18	cutting 14:4 15:18,20	detainee 18:11 21:20 23:4,22 24:20
conclude 40:22	10:2,3,10,14 11:6 13:8 15:3	cv 1:6	27:13 47:16
condition 14:20 16:14 25:16 44:11	15:10,24 16:7 17:12,18,23	d	detective 9:3 25:22 27:1
conduct 7:4	18:1,4,22 19:7 20:22 21:16	daley 2:12	determined 39:13
conducted 15:8	21:19,24 22:7 23:8 24:12	dancing 46:11	developed 23:11
conformance 7:7	24:19 25:6,21 27:11 28:17	dated 16:16	developing 24:14
consent 12:1	28:24 29:12 30:15,18 31:19	day 1:16 15:8 21:20 27:14	diagnoses 19:8
contact 24:9	33:17 34:6 35:19 36:5	32:21 49:7 50:12	died 27:21
contacted 9:4	43:16	death 28:4,8,12	different 9:21 10:19 33:19 36:23
continuation 25:7	counts 26:8	decide 47:24	44:10
continues 15:17	county 1:7 2:10,16,18 27:19,22	decided 44:8	difficulties 41:12
contra 19:8	49:3,12	decision 20:20 21:5	diploma 42:12
conversation 38:6	couple 9:21 17:4 38:4 43:11,23	defeat 39:10	direction 42:9
cook 1:7 2:10,16,18 27:19,22	court 1:1 26:12 41:22,24 43:12	defendant 1:8 2:15	discharge 18:5,14 25:16
49:12	49:10	defendants 49:13	discharged 15:2 40:19
cookcountyil.gov 2:14,23	courthouse 17:14 18:15 27:15	dep 5:23 6:2,3	discharging 25:11
copies 9:21	courts 1:13	department 4:6 5:13 7:21 8:18 9:18	discussed 16:21
copy 9:17 31:15	created 18:6	10:11 12:17 13:9 15:3,10	discussing 4:4
cordova 34:17,20,24	cruz 8:21 9:15 10:11 11:19	15:13,24 16:13 17:18 18:23	discussion 6:21 47:6
correct 4:6,15 5:16,17 7:9,22 10:3	12:24 13:18,23 14:6 15:1	20:22 21:16,20 22:1,8 23:8	distress 40:23
10:21 11:9,12,20 12:4,5	15:12,23 17:13,17 18:21	24:12,20 28:6,17,24 29:12	district 1:1,2,13 49:10,10
14:17,22 16:1,7,19,21,22	20:17 21:15 22:17 24:3,6,7	30:15,18 32:22 34:7 39:20	division 1:3 9:3 49:11
17:1,20 18:7 19:4,5 20:1,2	24:21 25:11 26:7,9,22 27:8	39:24 40:12	
	27:11 29:4,11,17 30:1 34:2	depend 30:21	
	36:22 38:14,18 44:1,5,19	depending 27:14	
	44:21 45:11,12 46:4,11	deponent 48:8	
	47:17		
	cruz's 28:4 44:11		
	cso 32:17 33:5,13 34:1,3,16,20		
	34:24 35:9,12,16,22 36:7		
	36:10 37:1 41:14,18 42:2		
	42:14,21 43:1,5,24		
	cso's 32:12		
	csr 1:23		

[doctor - great]

doctor 21:6	ends 17:11	extra 4:17	foundation 14:9 20:8,23 24:15 28:9
document 4:12,23 5:19,24 6:4 10:2,9 13:3 16:10,13 17:5,7,11 18:5,9,21 19:8 20:15 31:12 32:15 34:24 43:11,13,14,17 44:16	enforcement 25:12	f	39:15 41:1
documentation 33:6	entered 10:24	facility 23:14,18 25:2,3 41:22	four 5:4,15 13:23 14:3,6,13,21 21:4,8,13 29:22 30:5,7 38:21 39:6,13 44:10
documented 39:7	entries 32:18 33:11,12,18 34:19 35:1,4,14,20,21 36:6 37:3 43:24 44:10 47:14,15	fact 14:2,5	fourth 11:14
documenting 34:1	entry 16:17 17:12 31:22 32:2,10 33:7 36:9,24 37:7,13,21 44:22	fair 29:1 42:18,19 46:9	francis 2:19
documents 4:6 6:7 17:10	errors 48:2	far 20:5	francis.catania 2:23
doing 39:10 47:17	estate 26:22	febrile 19:9	frank 4:3 6:17 38:5
domestic 9:10,13	et 1:4,7 49:11,12	federal 7:8	free 35:7
doorway 28:19	evaluate 23:4 24:20	feel 25:1 35:7	frozen 46:24
doubt 4:3	event 39:1	felt 23:12	further 12:15 19:7 26:15 41:8,9 48:8 49:14,24 50:3,7
drawing 45:12 46:1	everybody 28:20 29:1	figure 5:11 32:17	g
duly 6:24 7:14 49:15	everybody's 42:10	file 12:2	general 2:18
durell 45:1	evidence 26:12	filling 32:12	getting 36:2
e	exact 15:11	finally 5:18	give 9:23 47:5
earlier 20:12,15 38:6	examination 1:11 3:2 7:16 26:19 38:2 41:9	finishes 11:10	given 29:4 49:17,22
easier 16:4	examined 7:15 40:2	first 7:14 10:14 13:19,21 16:17 31:22 32:2 33:5,11 34:3 35:12 36:15 39:21 45:10 49:15	go 6:19 15:18 17:5 20:16 26:12 27:17 32:19 33:15 35:18 41:23 43:23 47:11 48:6
eastern 1:3 49:11	example 42:6	fit 41:5	goes 43:9
education 42:7,22	exceptional 22:21	flaxman 2:3,4 3:5 4:1,7,13 5:3,8,14 5:17,21 6:6,9,14,18 7:10 14:9 15:15 20:8,23 24:15 26:16,18,20,21 28:11 31:7 36:4 37:23 39:15 41:1 46:24 47:5,21	going 10:5 12:24 17:23 21:15 34:18 43:8,12
effect 24:24	exceptionally 22:3 28:16	follows 7:15	goings 20:6
eight 4:17	excuse 35:20	foregoing 49:21 50:1	goluska 36:13
either 27:15 47:24	exhibit 3:12 4:9,18 5:22 16:3 43:14 43:18,20	forensics 25:12	goluska's 36:15
elizabeth 34:16	expect 13:7 18:10 21:13 23:21	forever 16:5	gonna 8:20 10:6 16:4 17:3 21:4 35:18
email 4:9 5:20 43:12,18	experience 40:5,10	form 12:1 16:11 20:11 28:9 31:2 32:12 33:1 44:17	grange 11:15,23 12:11
emailed 5:15,19	explained 12:13		granted 39:24
embolus 24:14	expressed 19:18		great 7:12
employed 34:6			

[grunting - knowledge]

grunting 46:14	high 42:11	include 18:14	issues 23:5,9,12 24:21
guess 15:17 30:21 47:3	hinsdale 15:2 18:6,22 20:17,21 24:2 24:7,11 25:7,10	increase 22:9	iterations 43:11
guys 19:12 21:7 23:7	holding 41:21 46:17,18	indicate 13:22	it'll 8:19
h	homicidal 19:9,15,24	indicated 44:15 45:11,12	j
hand 30:9 50:12	hope 43:9	indicates 13:17 14:5 44:18	jail 27:19,22
handcuffed 14:12,17	hospital 9:16 11:16,24 12:11,13,16 12:21 14:17 15:2 18:7,14 18:22 20:17,21 21:6 23:18 23:21 24:2,7,10,11 25:3 29:10 30:1,9,19,20 31:1 38:10,23 39:21 40:6,12,19 41:4	indicating 14:16 25:11,14,15	january 8:19
handcuffs 30:19 31:4	hospitalized 18:11	individual 10:17 32:16	jim 1:11 3:3 7:13,19 49:8,14
handling 8:21	hour 1:17 8:4	information 11:22 18:17 23:20	job 8:14
hands 30:12 44:2	hours 13:23 17:19 35:4,15,15	initial 38:10	joel 2:4 4:1 5:5,16,21 6:17 11:20 12:16,20 26:21 35:24
handwriting 32:23,24 33:5 34:9 36:23 37:2	huh 44:7,12,24 45:3,7	initially 9:5	john 2:20 6:17 33:13,24 34:1 36:1 37:4,18 42:6
happened 40:16	human 42:9	injuries 9:16	john's 33:6 34:3 37:1,9,21
happening 31:6	hundred 41:2	injury 31:10 40:14	join 39:17
hard 35:6	i	inside 16:14	judge 27:17
health 21:12 22:7 23:14 25:3,4 42:20,22	idea 42:5	instance 39:22 40:19	jump 36:1
healthcare 23:14	ideation 19:9,14,15 20:1	intake 16:12	junior 9:15 38:14
hear 6:12,13,14	ideations 19:19	interaction 32:15	k
hears 6:10	identification 3:11 43:21	interested 50:9	keep 20:6
held 29:11	identified 6:7	intervals 22:11	kenneth 2:3 36:16
help 33:21	illinois 1:2,16 2:6,13,22 49:1,5,10	intervention 23:13	kept 30:19
heparin 24:3 29:4,7	illness 19:9 20:7,11 22:7	interview 38:10	kind 10:7 32:22 38:8
hereinbefore 50:6	implement 21:8,13	interviewed 26:2	knife 9:14
heretofore 49:6	implements 45:16	interviewing 29:17	know 5:16 6:8 7:2,5 8:21 12:7,8 12:23 13:14 15:5,11,19 17:18 18:24 19:18,18 20:6 20:13 21:2,10 22:10,15,21 22:23 24:24 26:2,4,12 28:19,20 29:7,17 30:9 32:20,24 35:3,6 41:14 42:4 42:7,10 45:16,22 46:7,8 48:2
hereunto 50:11	important 23:23	investigation 26:4 38:15	knowledge 19:20
hervieux 35:9,16,22 36:7,10,11 43:24 44:4,8,18,22 45:12 46:1,3	incidence 9:4	investigations 27:2	
hide 44:6	incident 11:19 12:15	investigator 9:3 25:23	
hiding 46:21		involved 8:21 9:14	
		issued 13:4,7	

[la - one's]

I	looks	missing	nurses
la 11:15,23 12:11	33:4,8,19 34:11 36:23 37:1 37:5,8 47:4	17:4	23:3 40:3
lactic 18:18	lose 22:24	mom 46:4	o
law 2:3 25:11	lost 15:15 47:3	moment 15:16	oath 7:5
lead 25:22	lot 5:10	moments 10:10	object 20:8
learn 27:21,23,24	m	monitor 41:21	objection 4:4 14:9 20:23 24:15 28:9 31:2 39:15,17 41:1
learned 28:3 29:4	making 36:21 46:14	monitoring 32:14	observation 34:2 36:21
left 17:9 27:11 44:9	man 38:15	mother 9:11	observations 22:9
legs 30:12	manage 22:6	move 19:6 44:19,22	observed 24:6
leticia 1:4 5:6 11:19 12:12,12,14 12:19 38:7 49:11	march 8:22 9:1 11:7 13:18,22 15:1 15:6,22 16:17,17 18:24 21:17 47:17	murder 26:9	obtained 42:7
letting 15:19	mark 43:13,18	n	obviously 31:4 42:10 44:15
level 25:4 42:1,5,7	marked 16:6 33:16 34:23 35:19	name 7:18,19 26:21 32:5,8 34:4 35:5,12 36:12,15	occurred 8:22 9:10 40:5
license 1:24	43:21	names 36:17	october 50:12
licensed 1:15 24:18 49:5	mattress 44:5,6 45:2 46:22	narrative 13:10 14:16	office 2:10,18,24 27:16 28:2
line 34:10,12	mean 14:7 21:3 22:16 28:15,22 29:21 31:8 32:9 37:16,18	nature 41:23	officer 10:21 12:9 13:8 16:18,20 17:13 20:13 32:9,15 33:4,8 36:13,15,19 41:18 45:1 47:16
link 5:15	42:5	naught 48:8	officers 9:5 32:13
links 5:20	means 25:24	near 12:1	offices 2:3
lists 10:20	meant 25:4	necessary 25:1	oh 8:16,24 27:4
little 27:5,5 31:21 32:1 33:5,13 33:24 34:1,3 37:1,4,9,18,21 41:15 42:6	medical 21:12 25:4 29:9 39:12 40:23 42:15,18	need 6:16 12:14 23:21 30:9 31:8 31:10 41:23 42:21 43:5	okay 5:18 7:12 8:20 9:7,12 10:1 10:5,5,13 11:3,10 13:2,20 14:15 15:5,9 16:6,9,16 17:3 17:22 18:20 19:21,24 20:12 24:5,11,18 25:24 26:10,15 26:18 27:11 28:3,22 29:2 29:18 31:17,21 32:4,7,8 34:3,15,18 35:3,18 36:23 37:6,11 38:13,20 40:16 41:13 42:4,13,20,24 43:8 43:19 44:3,18 45:9,24 46:3 47:14 48:6
lookup 36:22	memorial 11:15,24 12:11	needed 23:12,18	once 9:6
log 6:1 17:10 21:16 31:15 34:23 47:5,16	mental 20:7,11 21:12 22:7 23:14 25:3 40:23 42:20,22	new 5:24 39:13	ones 21:13
long 8:17 17:7	mentioned 12:19 50:6	nicole 35:13	one's 33:16
look 10:7 12:7 18:16 19:21 25:6 29:15 32:2 33:12 48:1	mentions 44:4	night 8:7	
looked 29:9,16 31:15 43:10	michigan 2:5	noises 46:15	
looking 4:21 10:9,13,23 11:6,13 25:20 26:23 32:2 43:15 44:8	minute 22:11 47:5	normally 37:16	
	minutes 44:21	northern 1:2 49:10	
	missed 26:24	notice 50:4	
		number 3:11 10:15,16,19 31:18 41:20	

[originally - read]

originally 16:24	person 7:7 28:7 30:17 32:11,14,16	practice 13:7 29:20,21	psychiatrist 23:7
outcome 50:9	42:9	prefer 8:12	psychiatry 43:4,6
p	personal 18:17	preliminaries 6:15	psychology 42:24 43:2
p.m. 8:7	personally 49:7	presence 49:19	psychosis 19:9 20:3,5
page 4:12,23 5:19,22 10:14 11:10,11 12:6 13:2,17 17:11,23,24 18:4 19:7 20:15 25:6 31:18 33:11,15 33:18 34:19,22,23 35:14,18 35:20,21 36:5,6 38:20 39:5 43:12,16,17	personnel 32:20	present 50:5	psychotic 18:18 19:4
page3 34:22	pertaining 1:13	pretrial 18:10 21:20 23:4,22 24:20 47:16	pull 4:13 9:23 16:5
pages 4:17,18 11:3 17:4	phone 15:18	pretty 17:19 40:15	pulling 16:6 41:13
paperwork 18:14 41:22	physician 40:3	prevent 31:5,11	pulmonary 24:14
paragraph 11:13,14,18 12:10 13:19,21	physicians 40:2	prior 14:13 29:17	pursuant 1:11 50:4
part 8:14 41:14	place 26:5 27:6 46:12	prison 31:15	put 31:18 36:17 39:13 41:22 44:8 45:2
participated 26:4	placed 12:2 13:23 14:2,6,13,21 16:24 38:21 39:6,11	prisoner 16:23	q
particular 41:20 42:22 43:16	plaintiff 1:5 2:8 4:2,24 5:3,8 6:6 7:10 49:12	probably 4:15 8:12 42:8 45:24	question 23:1 43:4
parties 6:3 7:3 50:2,8	plaintiff's 5:14,21	problem 8:14 41:16	questioning 29:24
passed 28:5	planning 12:20	procedure 1:12 7:8 22:13	questions 26:15,16 37:23 38:4,6,8 41:8 47:22
password 10:1	please 7:18	procedures 22:6,22	quibbling 22:21
patient 22:6 23:9 40:20	point 13:16,23 14:3,6,13,21 15:13 16:2 21:4,8,13 22:12 27:23 29:1 30:5,7 33:20 38:21 39:6,13 42:8	proceeded 11:15,23 12:10	quite 13:10 17:19
patient's 25:15 30:11	police 4:5 5:13 7:21 8:17 9:18 10:11 12:17 13:8 15:3,10 15:13,24 16:13 17:18 18:22 20:22 21:3,16,19,24 22:7 23:8 24:12,19 28:17,24 29:12 30:15,18,24 34:7 39:20,24 40:1,7,12,24 41:6	processed 18:12 27:19,22	quotes 45:20,21 46:1
patricia 34:5	policies 22:5,22	professional 24:19	r
patrol 9:4	policy 22:13 30:23	pronounce 35:5	raelene 1:14,23 4:10 7:3 48:3 49:4
pd 31:19 33:17 35:19 43:16	portions 5:21	prosecuting 25:20 26:1,10	rage 15:21
pending 49:9	position 41:19	protected 10:1	ragen 2:11 3:4 4:1,8,15,21,23 5:4 5:10,18 6:7,16,20 7:1,12,17 14:10 15:17 20:9 21:1 24:17 26:15,17 27:7 28:9 29:3,9 31:21 39:17 41:10 43:8,22 47:10,13,20,24 48:6
people 28:21 33:19	possibility 36:19	provide 26:3,12	rank 26:23
percent 4:16 41:2	power 2:20 35:24 36:2	provided 9:17 22:17	rare 40:15
perfectly 21:11		provider 21:12	read 7:3 13:19 36:9 47:8
periodically 16:14		provides 6:1 12:7	
		providing 13:14	
		psychiatric 23:4,9,12 24:21	

[reads - spell]

reads 12:10	reporting 10:20 12:9 13:8 16:20	s	sheriff's 2:24 27:15 28:6
really 8:12,24 15:18	reports 10:19	safety 30:10,11	shift 7:23 8:3,6,7
reason 18:17 39:5,7 45:6	represent 26:21	saith 48:8	shorthand 1:15 49:4 50:17
reasonable 22:1,17,20 37:17	requested 47:9	saying 44:1	shortly 7:24 12:13 14:7
reasons 39:12	required 43:1,6	says 10:14 12:1 16:23 18:16,17 18:18 19:8,15,24 25:19 26:1 31:19,23 36:11 43:15	show 31:12
recall 9:12 13:1 28:1	resources 42:9	scene 9:5	shows 12:8 14:24 20:12,16
receive 18:10,10 23:20	respect 28:20	school 42:12	side 44:9
received 21:24	respective 50:2	screen 4:10 10:6,9 13:3 31:14 43:9	signature 12:8 48:1 49:24
recollection 29:18	responded 9:5	scroll 11:4 17:4 31:17	sir 24:4,23 26:21 30:16 31:24
record 6:19,22 7:1 10:8,11,16 18:2 25:15 31:18 36:1 47:7,8 48:7	response 5:13	scrolling 10:17	sit 8:10
recorded 38:6	rest 33:11	search 12:1	situation 30:22 40:11
records 9:18 19:22 25:8 29:10,15 32:20	restrain 21:4 30:10	second 9:23 13:19 41:12	situations 31:5
reduced 49:19	restrained 20:17 24:6,8 30:1	section 38:13 39:4	slash 36:11
reflect 7:1	restraint 30:8	secure 30:12	sleeping 8:13
regards 9:13	restraints 13:24 14:3,6,8,14,20,21 21:5,8,13 30:5,7 38:22 39:6 39:13	security 39:11	small 32:22
related 50:8	retired 36:14	senior 38:18	soak's 4:14 5:23 6:2
release 41:5	returned 40:7,12,24	sent 21:16 23:13	sodt 25:22
released 12:13 18:13 41:5	richard 2:12	sentence 11:23 12:9	somebody 16:12 21:4 30:10,24 36:17 39:5 41:5
relied 13:14,15 41:4	right 10:8 12:7 14:15 17:10,24 19:17 21:7,21 22:12 30:5 31:14 33:7 37:9,18 38:16 38:23 39:8,22 40:3,13,17 40:20 41:6 43:10 45:9	september 1:16 49:7	somebody's 31:3
relying 29:19,21	risk 24:13	sergeant 4:14 6:10 7:20 27:3 38:5 48:6	son 9:11,15
remember 9:7,9 27:9 28:3 29:5,13 30:2 38:8	role 8:20,22 9:1	serious 20:7 40:14,23	sorry 8:2,23 10:5 19:16 26:24 32:1 40:8 45:8,12,22
remotely 7:4,5	room 36:20	service 32:13 41:18	sounds 4:21 39:16
report 5:22 10:23,24 11:7 13:4,6,9 13:15 16:21 24:1,13 26:22 38:7,14,20 39:4	rules 1:12 7:8	set 10:16 50:11	source 24:2
reported 1:23 49:18	running 17:10 46:12	share 10:6 26:17,18 43:9	south 2:5
reporter 1:15 43:12 49:5 50:17	ryan 13:4	sharing 4:10 10:8 13:3	speak 8:9 12:11,14 38:18
		sheriff 1:7 5:2,9 6:5 7:11 47:22 49:12	specifically 33:20
			spell 35:7

[ss - vargas]

ss 49:2	strap 30:11	testify 49:15	treat 28:18,20 29:1
stabbed 9:15	street 2:21	testimony 26:3 49:17,22 50:11	treated 22:3 28:16,22 30:20,24 40:2
stable 25:16	strike 20:14	thank 6:12 8:15 13:12 22:4 38:1 39:18 47:12,23	treatment 21:24 22:17 31:8,10 39:21
staff 21:6 23:3 30:9 39:12	subject 38:14	thanks 15:19 37:24	tried 39:7
stamm 1:14,23 49:4	subjects 22:10	thereof 50:10	true 49:21
stamped 4:24 9:23 10:2 43:13	subpoena 5:14	thing 27:7 31:22 42:20,24 43:9	truth 49:15,16,16
standard 16:11	suicidal 19:14,19	things 41:23	try 22:9 28:19 33:20 35:5 43:8
standing 44:1,23 46:17,18	suit 50:9	think 4:18 6:7,9,16 8:9 15:7,15 15:16 19:17 21:10 23:1 33:10 46:24 48:3	trying 5:11 23:1
start 11:4 18:2 22:16 33:22	summary 18:6	three 5:5	turn 12:6 13:2 16:2 17:22 43:10
started 6:19	supplemental 13:10	time 4:10 6:18 9:2 10:7 14:13 15:10,12,23 16:2,23 17:10 17:12 18:23 26:22,24 32:3 35:6 36:14,20 37:16,24 40:24 45:10 46:9	turning 17:21
starting 17:24 18:4 34:18 35:4	support 26:13	timed 36:10	type 18:9 23:11,12 42:1
starts 11:11,14 14:16	suppose 32:19	times 23:16	typewriting 49:20
state 1:15 7:18 49:1,5	sure 6:10,19 9:21,22 17:5 25:9 28:2 29:23 33:3 40:9	toilet 44:1	typically 30:8 32:11,21
statement 7:2 24:5	sworn 6:24 7:5,15 49:15	told 12:3 23:22 24:2 28:7 45:2	typographical 48:2
states 1:1,12 49:9	symptoms 18:18 19:4	top 33:2 44:2,5	u
state's 2:10 26:8 28:1	t	tough 37:15	uh 44:7,12,24 45:3,7,7,7
station 24:23 40:1	taken 1:14 27:6,12 29:11 30:18	trained 21:7	ultimately 22:15
stay 16:4 17:6	talk 4:11 8:16,20	training 42:2,15,18,21 43:2,6	understand 27:18 33:7 39:2 45:6
stenographically 49:18	talked 4:2 5:23 6:1,2 30:4	transcript 7:6 49:21	understanding 27:12 42:14
stepfather 9:11	talking 4:1 10:10 25:8	transcription 49:20	undetermined 49:9
stern 1:11 3:3,12 6:10 7:13,19 48:6 49:8,14	tasked 32:14	transfer 25:1	unfortunately 23:10
stipulate 5:6 6:4	tasks 41:20	transferred 18:23	uniform 30:23
stipulated 5:2,3,8,9 6:5,6	technical 41:11	transport 23:17	unit 27:2
stipulating 4:4	tell 14:15 15:20 16:9 24:11 25:18,24 28:8 32:22 33:17 33:23 34:9 37:6,13 41:13	transported 9:16 15:2,23 17:14	united 1:1,12 49:9
stipulations 6:17	terms 14:20		use 4:16 16:11 41:19
stop 26:17,18	terrible 35:8		usually 22:10,11
strange 44:16	testified 7:15		v
			vargas 1:4 5:6 11:19 12:3 38:7

[vargas - yep]

vargas (cont.) 49:11	william.ragen 2:14
venem 13:4 16:18 17:13 20:13 32:9 33:8	wit 49:6
venem's 24:5 33:4	witness 3:2 6:12,23 7:14 24:16 26:1 26:10 28:10 31:3 38:1
victims 9:14	39:16 41:2 47:3 48:5 49:8 49:18,19,22
video 2:4,11,19,20 5:20	witnesses 5:5 25:20 26:3
videoconference 1:10	work 8:7 35:8 37:16
videos 5:4,7,10,15	worked 8:17
violent 9:10	working 15:5 32:21
virtually 17:8	wrists 30:13
visit 12:24 18:17	writing 45:15
visited 12:16,16	written 22:13
visiting 12:20	wrong 42:12
vs 1:6	wrote 11:7 16:20 46:1,4
w	y
waive 47:24 48:4	yeah 4:22 6:9,16 9:13 11:3 15:14 18:13 19:16,23 23:17 37:1 40:18,18 41:17 44:17 46:2 47:14
waived 50:1	years 8:19 27:4 29:22
wall 45:13	yelling 46:15
want 6:10 7:2 9:20,22 12:6 17:6 18:1,2 20:16 33:20 43:23	yep 6:20
wanted 22:15 42:4	
washington 2:21	
week 27:14	
weekend 27:17	
weeks 5:16	
went 47:15	
west 2:21	
whereof 50:11	
william 2:11	