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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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ALLIANCE FOR GLOBAL JUSTICE, :

ET AL., :

Plaintiffs, : Case No.

V. : 1:01CV00811

DISTRICT OF COLUMBIA, :

ET AL., :

Defendants. :

----- x

DEPOSITION OF CHIEF CHARLES RAMSEY

Washington, DC
Friday, March 1, 2005

REPORTED BY:
SARA EDGINGTON

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1 a considerable distance.

2 Q And with respect to the march themselves,
3 the composition of the march, about how long was
4 that? Do you have any knowledge as to that?

5 A No, I don't know.

6 Q Do you have any sense as to how far the
7 rear of the march was from the front?

8 A No, sir.

9 Q You stated that on numerous occasions,
10 there was a wholesale movement of the march into the
11 street. Is that accurate?

12 A Yes.

13 Q On how many such occasions?

14 A I don't know.

15 Q Who told you of these?

16 A I don't recall specifically. I just don't
17 recall specifically.

18 Q Did you -- do you recall asking whether
19 these -- how many persons were involved in these
20 movements?

21 A No.

22 Q Do you recall asking how long in duration,

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1 period of time, the period was that persons were in
2 the street?

3 A No.

4 Q Do you recall asking whether there were any
5 particular circumstances that would make -- have it
6 make sense that persons would move into the street,
7 for example, an obstruction along the sidewalk?

8 A No.

9 Q Do you recall inquiring as to what the
10 police response was when persons stepped into the
11 street?

12 A I recall being informed that marchers were
13 instructed to get out of the street.

14 Q Who told you that?

15 A Again, I don't recall specifically. I
16 would hate to be in error but those officials that
17 would have been on scene would have been the ones
18 that would have communicated that. I just don't
19 recall. We have had so many events at so many
20 different locations, I just don't recall who was
21 there.

22 Q Were you informed of that on the day of the

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1 events as opposed to in recent times?

2 A On the day of the event.

3 Q Did -- were you informed as to who told
4 marchers to get out of the street?

5 A I don't recall that.

6 Q Do you recall whether you were informed as
7 to how marchers were told to get out of the street,
8 and by that I mean was there amplified sound used?

9 A I don't recall.

10 Q Do you recall being informed as to what
11 communications, what orders were given by the police
12 when persons stepped out onto the street?

13 A The precise words, is that what you are
14 asking?

15 Q I am asking.

16 A I don't -- I don't know.

17 Q Do you recall being informed whether
18 persons complied with orders or requests to move onto
19 the sidewalk?

20 A I was informed that there were at least one
21 point in time when there was compliance but then
22 after a short period of time, the same situation

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1 developed again with people back in the street
2 impeding traffic.

3 Q Do you know where along the march route --

4 A I don't know exactly.

5 Q -- the march was moved into the street?

6 A I don't know exactly.

7 Q Do you know over what portion of the march
8 route marchers were, in fact, in the street?

9 A No, sir.

10 Q You do recall that at least one point in
11 time there was compliance with requests or that's
12 what you were advised, is that --

13 A That's what I was advised.

14 Q When -- how is it that you made the
15 decision to come to the site, to the scene where the
16 arrests were to occur?

17 A Well, I was moving to a variety of
18 locations. I don't recall if I heard it on the
19 radio. More than likely, monitoring the frequency,
20 that's how I came to have knowledge that arrests were
21 either going to be effected or were in the process of
22 being effected.

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1 A There is a field commander that's in
2 overall charge of the entire event, not just one
3 specific event, and that field commander is the chief
4 of police, me.

5 Q You are uncertain who was in charge when
6 you arrived; is that accurate?

7 A Right, without referring to the operations
8 manual.

9 Q Once you arrived, was there any officer
10 more senior than you there?

11 A No.

12 Q Were you -- did you become the officer in
13 charge at that time?

14 A I'm always the field commander but I
15 delegate responsibility in these events to senior
16 commands that are on the scene.

17 Q When you had the conversation with
18 Commander Acosta, at that time was the containment of
19 arrestees complete?

20 A I can't remember specifically but more than
21 likely that was the case. If it wasn't, it was near
22 complete. I mean when things are going on, there is

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1 Q How much time had passed between the time
2 you arrived on the scene and when you had this
3 discussion with Commander Acosta?

4 A I don't know.

5 Q Was it more than an hour?

6 A He had some responsibility for arrest
7 teams, as well, so it could have been the result of
8 his arrival as part that of that.

9 Q For what period of time do you recall
10 observing or being present while the containment area
11 between 20th and K and 20th and I was up?

12 A Repeat that.

13 Q How long was the containment area between
14 20th and K and I in effect?

15 A I have no idea. I don't know.

16 Q Was it a period of hours?

17 A Oh, I don't know. I wasn't there for hours
18 but I have no idea.

19 Q What was the communication with Commander
20 Acosta?

21 A Again, my principal communication was,
22 again, with Gainer was present, just basically

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1 getting a handle on what had taken place and why the
2 arrests were being made. I don't recall if that was
3 coming directly from Commander Acosta, if he was just
4 one person that happened to be standing there and it
5 was coming directly from Terry Gainer or not but it
6 was a discussion about the fact that it was a parade
7 that was unpermitted and it had been taken to the
8 street on several occasions, had taken it again at
9 that location, and at which time a decision was made
10 to -- to stop it and to take them into custody.

11 Q Who made the decision to stop it and take
12 them into custody?

13 A I don't know who originally made that
14 decision.

15 Q Have you ever inquired as to who made that
16 decision?

17 A No, I may have, I just don't remember now.
18 It is five years ago. Been a lot of protests between
19 then and now.

20 Q This one, however, is the subject of this
21 litigation.

22 A So are several others.

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1 Q Now, Commander Acosta and Assistant Chief
2 Gainer provided you information about the basis of
3 reason why this arrest was taking place; is that
4 accurate?

5 A They provided me information as to what was
6 going on at the time which led to the arrests.

7 Q Did any other persons provide you
8 information about what was going on at the time that
9 led to the arrests?

10 A It is possible. I just don't recall.

11 Q Jeffrey Harold?

12 A He may have been there. I don't know.

13 Q Did he speak with you directly?

14 A It is possible but I don't believe so. It
15 is possible.

16 Q Was Commander Acosta the officer who was in
17 charge then at that time that you were communicating
18 with him?

19 A I would have to refer to the operations
20 manual to see who had that area of responsibility in
21 terms of the overall operational plan. There would
22 have been an assistant chief who would have had the

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1 that led to the decision to make arrests and where
2 they were -- where we were, rather, in terms of
3 having ordered buses and arrest teams and all that
4 sort of thing.

5 Q Why was this summary being given to you, to
6 your understanding?

7 A Why was it being given?

8 Q Uh-huh.

9 A Because I asked.

10 Q Why did you ask?

11 A Well, because it is part of my
12 responsibility to ask why the arrests were taking
13 place. I was satisfied that they had reason and went
14 to the next event.

15 Q Can you please describe with as great
16 specificity as possible what the information was that
17 was provided to you about what was going on that was
18 the basis for these arrests?

19 A Unpermitted parade, refusing to leave the
20 street when ordered to do so, tying up traffic.

21 Q Any other -- are there any other reasons
22 that were provided to you at that time?

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1 Q And you knew this contemporaneous with
2 events there on the scene; correct?

3 A On the scene, it was brought to my
4 attention. They actually brought it to my attention.

5 Q So on the day contemporaneous with the
6 arrests, you -- you knew that the containment zone
7 had been established in such a way that it included
8 nonparticipants?

9 A That's not what I said.

10 Q I'm asking.

11 A But that's not what I said. You weren't
12 asking, you were more or less making a statement.

13 Q I'm asking you, Chief, did you know, did
14 you know at the time of the events that the
15 containment zone had been put into place in such a
16 manner as to include persons who were nonparticipants
17 in the unpermitted parade?

18 A No.

19 MR. KOGER: Lack of foundation.

20 THE WITNESS: No.

21 BY MR. MESSINEO:

22 Q You did not know that that day?

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1 A No.

2 Q When did you come to learn about the
3 tourists from Russia?

4 A I did learn that day because they told me.
5 They were not in the containment area, however, they
6 were simply trying to get past our lines and didn't
7 want to get caught up in anything so they just wanted
8 to be able to get to their buses but they clearly
9 were not in the area.

10 Q What inquiries did you make to establish to
11 your satisfaction that there were no nonparticipants
12 in the parade contained in that arrest zone?

13 A I don't recall specific questions that may
14 have been asked other than those general questions
15 about what had taken place and the people who were on
16 site and their sense that the people that they had
17 contained were, in fact, people who were part of this
18 particular group.

19 Q With respect to credentialled media, were
20 credentialled media caught inside the containment or
21 arrest zone?

22 A Yes, they often are.

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1 credentialled media to leave the arrest zone?

2 A I don't recall specifically for that
3 event. I mean there have been instances when I have
4 done that. I just don't remember if that is one of
5 them.

6 Q So that even if they had been walking in
7 the street with a camera filming the parade, would
8 you as a matter of routine have allowed credentialled
9 media under those circumstances to leave the arrest
10 zone?

11 A I did not personally observe that. It
12 depends on the circumstances. Again, when we give an
13 order to leave the street, that applies to everyone,
14 including media.

15 Q Were there pedestrians that were in the
16 area between 20th and K and 20th and I when the lines
17 were put up to create an arrest zone --
18 nonparticipant pedestrians?

19 A I wasn't there when it started so I don't
20 know who was on the street and who wasn't on the
21 street.

22 Q As chief of police, who did you ask, if

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1 question but this question is particular. At that
2 time, did you, Chief Ramsey, hold a belief that all
3 the persons of the hundreds of persons that were
4 contained in the arrest zone had, in fact, refused to
5 leave the street?

6 A You are asking me to give you a specific
7 state of mind at a point in time five years ago that
8 I can't tell you precisely what I was thinking at the
9 time. I can tell you that I believed at the time
10 that we had probable cause to effect arrests at that
11 location based on the behavior of individuals who
12 were involved in that march.

13 Q Which individuals?

14 A Individuals that were involved in the march
15 that were contained.

16 Q Which individuals?

17 A Don't know their names.

18 Q How many?

19 A Don't have that off the top of my head.

20 Q What percentage of those that were arrested
21 are you referring to as those individuals?

22 A There is no percentage that I am referring

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1 THE WITNESS: Any decisions I made or that
2 I was aware of is not based on any information that I
3 have today, it is based on what I knew at the time
4 and at the time I believe that the people were taken
5 into custody were, in fact, people that had committed
6 the violations they were charged with.

7 BY MR. MESSINEO:

8 Q What were they charged with?

9 A I have not reviewed every single arrest
10 report, however, I believe that among the charges
11 were parading without a permit, incommoding, which is
12 blocking the public way, failed to obey, perhaps, I'm
13 not -- I don't know if that's all inclusive or there
14 were some additional charges. Again, there were
15 quite a few people that were taken into custody and I
16 have not reviewed every single report.

17 MR. MESSINEO: Let me -- can we mark that
18 drawing, the diagram, as the next subsequent
19 exhibit?

20 (Ramsey Deposition Exhibit 9 identified.)

21 BY MR. MESSINEO:

22 Q Did you, Chief Ramsey, approve of the mass

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1 arrests that took place there?

2 A Did I approve of or did I formally
3 approve? I don't quite understand how you mean
4 that. I didn't -- I didn't -- I believed at the time
5 that there was probable cause to make the arrests
6 that were made.

7 Q If you had come to a different conclusion,
8 a different belief, would you have stopped the
9 arrests?

10 A If I thought they were improper, yes.

11 Q Because you, as chief of police, have the
12 authority to stop those arrests at that time;
13 correct?

14 A Correct.

15 Q And you chose not to stop these arrests;
16 correct?

17 A I saw no reason to.

18 Q Let me just hand you --

19 MR. MESSINEO: We will mark this as the
20 next subsequent exhibit.

21 (Ramsey Deposition Exhibit 10 identified.)

22 BY MR. MESSINEO:

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1 conduct that justified the arrests that were in the
2 process of taking place and I had no reason to
3 believe that those people that were arrested were not
4 participants in those events.

5 BY MR. MESSINEO:

6 Q Chief, I have to keep asking the question
7 until I get an answer. You are telling me, is it not
8 correct, that you held the belief that all the
9 persons -- that the persons being arrested were
10 participants in the parade or the march, is that --
11 that's what you are saying; correct?

12 A I'm saying that was my belief.

13 Q Okay. I'm asking you a different question
14 and it is the question I want you to answer. What
15 was the basis for -- strike that.

16 Did you hold a belief at that time that
17 every person who was a participant in that march had
18 notice that the march either was or was no longer
19 permitted by the MPD, either was never or was no
20 longer permitted by the MPD?

21 A I had reason --

22 MR. KOGER: Foundation. Objection.

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1 warning that contains the consequences if you fail to
2 heed that particular warning. I wasn't there but our
3 people are well versed in that area.

4 Q And that standard procedure is important to
5 be followed; is that correct, sir?

6 A That's why we have them.

7 Q Doesn't that procedure require there to be
8 notations or entries made in a commander's event log
9 when significant events such as provision of notices
10 or warnings are given to a demonstration?

11 A I don't know what was in the manual in
12 April of 2000. We certainly now require that a
13 record be maintained.

14 Q Was a record maintained of the provision of
15 warnings to your knowledge?

16 A Oh, I don't know.

17 Q Was a mass demonstration event log
18 maintained in the context of this mass arrest?

19 A I don't know.

20 Q Have you ever asked to see such a
21 commander's mass demonstration event log for this
22 mass arrest?

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1 A I don't recall asking.

2 Q Do you know whether any of the orders that
3 were given, which so far you have testified to orders
4 that persons should leave the street, were of such
5 amplification and repetition as to be heard by the
6 entire group?

7 MR. KOGER: I would object to the
8 characterization of his testimony.

9 But you may answer.

10 THE WITNESS: I don't know if the warnings
11 were given through an amplified device or through
12 just human voice without any amplification.

13 BY MR. MESSINEO:

14 Q Did you make inquiry at the time that you
15 allowed these arrests to continue as to whether
16 amplified sound was used in any communication with
17 these 2,000-plus demonstrators?

18 A No, I didn't. I assume that it was
19 adequate since I had been told that people had, in
20 fact, complied at one point, led me to believe that
21 people heard what was being said to them when they
22 got out of the street before.

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1 Q Did you believe that all 2,000-plus persons
2 heard an order to get out of the street?

3 A My understanding is everybody got out of
4 the street and I don't know if that means they all
5 heard it or not but I made an assumption that that's
6 the case since they obeyed the instruction.

7 Q Did you believe at the time that warning or
8 notices were given from police vehicles equipped with
9 public address systems moving about the crowd?

10 A Oh, I don't know.

11 Q You don't know whether you believe that at
12 that time?

13 A I don't know whether it even came up. I
14 mentioned before I don't know the manner in which the
15 warnings were given, whether they were there some
16 amplified system, which would include a car, or the
17 human voice without amplification is what I
18 originally said and that's still the case.

19 Q And who was the unit commander? Was there
20 a unit commander?

21 A For what purpose? There are a lot of
22 them. I mean there are a lot of unit commanders.

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1 certainly tell people about their behavior and
2 conduct.

3 BY MR. MESSINEO:

4 Q You don't even know who gave these orders
5 to which you are referring; correct?

6 A That's correct.

7 Q And you didn't know at the time who gave
8 the orders to which you are referring?

9 A Not specifically.

10 Q You didn't seek out the person?

11 A Any police officer has that authority so it
12 really didn't matter.

13 Q Was the number of warnings given recorded
14 on the commander's log?

15 A Don't know.

16 Q Was the time intervals, if there were any,
17 between warnings, if any were given, written in the
18 commander's log?

19 A Don't know.

20 Q When the persons were contained in the
21 arrest area between 20th and K and 20th and I, what
22 was -- did you observe them in that zone?

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1 with or without a breach of the -- of the peace.

2 Q So they could be told to move on or
3 disburse even absent a breach of peace?

4 A It would depend on the circumstances but
5 because this is Washington, the White House and
6 various other security concerns that we have, might
7 be reason to not allow a particular area to be used
8 for that purpose.

9 Q Is it unlawful, and I'm speaking of back in
10 April of 2000, for a person to, with others, march on
11 the sidewalk provided they don't violate traffic
12 regulations or incommoding?

13 A They can march on the sidewalk as long as
14 they don't incommode or block or disobey traffic, as
15 long as they stay on the sidewalk.

16 Q Did you have a belief at the time that you
17 approved of the mass arrests that -- or whether there
18 were any individuals who had been a part of the march
19 and who had walked on the sidewalk throughout the
20 entirety of the march?

21 A I wasn't there so I did not have any
22 personal observations. Again, I was -- I was simply

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1 listening to what I was being told at the time, which
2 I felt the actions being taken were appropriate.

3 Q Did you at the time make any inquiries of
4 your officers or staff to inquire as to whether there
5 is a possibility that any of the people that you were
6 arresting had, in fact, been on the sidewalk the
7 whole time?

8 A No.

9 Q Do you today approve of these arrests and
10 how they were executed?

11 A I feel the arrests were justified, yes.

12 Q With respect to -- and I'm letting you know
13 that I'm changing -- I have one other question about
14 the convergence center, one brief area:

15 A Could we take a five-minute, ten-minute --
16 is that okay -- wash room and come right back?

17 MR. MESSINEO: That's fine.

18 (Recess.)

19 THE WITNESS: Yes, sir.

20 BY MR. MESSINEO:

21 Q If we assume that the police allowed the
22 march to step off, to begin, is it your testimony

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1 the marchers even without giving an explicit order to
2 disburse to the participants?

3 A That's not what I said.

4 Q I'm asking you.

5 A We would inform people that what they were
6 doing was unlawful. If they still did not come into
7 compliance, then we would be able to arrest. Now,
8 that's not a legal requirement, that's our own
9 internal policy to give a warning.

10 Q You are distinguishing in your response
11 between a warning that conduct is unlawful from an
12 order to disburse, sir?

13 A Well, I don't know what -- how -- what you
14 are trying to get at here. I mean I'm not an
15 attorney. I'm just trying to answer as truthfully as
16 possible. We may not give an order to disburse but
17 to cease whatever behavior it is that is causing the
18 violation of the law. We -- if they fail to obey, we
19 could make an arrest. We do not have to first give
20 them an order to disburse. If they commit an
21 unlawful act, they could be arrested for that
22 unlawful act.

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1 Q Including stepping in the street?

2 A Stepping in the street, parading without a
3 permit, impeding the flow of traffic, again, stepping
4 in the street, just so that people clearly
5 understand, was not one foot on the sidewalk, one
6 foot off the sidewalk, we are talking about in mass
7 moving into the street, impeding the flow of traffic.

8 Q In this specific situation that I was
9 asking you to presume with presuming that the MPD
10 allowed this march to step off and begin, is it your
11 testimony that there need not be an explicit order to
12 disburse given to the participants that would let
13 them know, for example, that this once allowed march
14 is no longer allowed?

15 A It was the behavior and conduct during the
16 march that was problematic. The -- my understanding
17 is that in working with this group, we were going to
18 allow them to march but on the sidewalks, obeying
19 traffic laws and so forth. They did not do that and
20 that's why they were arrested.

21 Q But don't you have to arrest the
22 individuals that stepped -- that violated a police

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1 expressed by your counsel?

2 A Reviewing our standard operating procedure
3 to make sure that we are following everything that we
4 have in the procedure and that our training reflects
5 that-- that standard operating procedure and policies
6 contained within that document.

7 Q Has he expressed to you a view on whether
8 it is good or bad policy for the MPD to be engaging
9 in mass arrests of protesters?

10 A He has never discussed that. That is
11 something that he would entrust us to make a -- a
12 decision as to when that would be appropriate.

13 Q Has he expressed to you that mass arrests
14 have been engaged in with a poor exercise of
15 discretion? And I'm referring most specifically in
16 this context to April of 2000.

17 A We did not have this discussion around
18 April of 2000.

19 MR. MESSINEO: Mr. Koger, I'm presuming
20 that you will object and so I'm giving you the
21 opportunity here. The chief is sued in his
22 individual capacity here. All the individual

1 protesters when there are anti-globalization protests
2 that are, in fact, law abiding protesters?

3 A Oh, I don't think in terms of percentages.
4 My experience is that the majority of people that
5 come to protests just want to express themselves and
6 not necessarily engage in civil disobedience in most
7 instances.

8 Q It's been reported in the press that with
9 respect to how the MPD conducted itself in regard to
10 the April 2000 demonstrations, that Chief Ramsey has
11 no apologies. Is that an accurate report of your
12 view?

13 A Well, I would have to see that. I don't
14 recall saying that for April of 2000 but I don't feel
15 like I have any now so I would imagine if I said
16 that, it would be fairly accurate.

17 Q Is there any criticism that you have of how
18 the MPD conducted itself in connection with the April
19 2000 mass demonstrations?

20 A I think that the department responded
21 magnificently to that event. I think that there was
22 a great deal of restraint used and I think we

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1 actually did prove that you could have large-scale
2 demonstrations and at the same time allow an event
3 like the IMF World Bank to move forward at the same
4 time and I'm very proud of that fact.

5 Q Would it be fair to say that you view this
6 to be sufficiently favorable as to be a model for
7 other law enforcement in terms of how to respond to
8 large-scale demonstrations?

9 A I think that our department is as good, if
10 not better, than anyone else when it comes to
11 handling demonstrations. That doesn't mean that we
12 aren't mistake-free because anybody can have one or
13 two instances that, if you could, you know, do it
14 again, you might handle it a little bit differently
15 but I think that we are about as good as any when it
16 comes to handling events like this.

17 Q And to be clear, you have identified no
18 mistakes that you assert occurred in connection with
19 the April 15th, 2000 demonstrations; is that correct?

20 A Well, I can't think of any offhand that are
21 major. I mean I'm very critical when it comes to how
22 we -- how we handle things and I'm sure that there

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