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1 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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4 RAYMING CHANG, et al., :

5 Plaintiffs, : Civil Action

6 v. : No. 02-2010(EGS)

7 UNITED STATES OF AMERICA, et al., :

8 Defendants. :

9 ----- x

10 Washington, D.C.

11 Wednesday, November 17, 2004

12 Continued Deposition of:

13 JEFFREY HEROLD,

14 called for examination by counsel for the Plaintiff, at
15 the Offices of Bryan Cave, 700 Thirteenth Street, N.W.,
16 Suite 700, Washington, D.C., before Barbara A. Huber,
17 court reporter and notary public in and for the
18 District of Columbia, commencing at 9:05 a.m., when
19 were present on behalf of the respective parties:

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1 involved?

2 A From the Metropolitan Police Department,
3 it's a 40-hour block of instruction, initially.
4 It involves the use of formations to control
5 groups of people, the use of various munitions to
6 quell violent activity. How to handle a
7 barricaded suspect is built into it. How to deal
8 with the movement of the President is built into
9 this 40 hours, psychology of mob behavior, crowd
10 dynamics. And, again, off the top of my head,
11 that's all I can remember.

12 Q Does it include training in terms of
13 mass arrest situations?

14 A Absolutely. Yes, it does.

15 Q Is there a limit, in terms of the MPD
16 policy, as to how many people can be arrested by a
17 single officer in a mass arrest situation?

18 A Yes.

19 Q What number is that?

20 A Fifteen at any one location.

21 Q And can you tell me why they came up
22 with the number 15, or why there is such a limit?

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1 A It stems from the activities of, I
2 believe, 1971, the May Day demonstrations, where
3 officers -- it was deemed by the courts, I
4 believe, that an officer could reasonably have
5 independent recollection of arresting 15, but no
6 more.

7 Q Why is it important for the officer to
8 have independent recollection?

9 A To provide that the person that was
10 arrested did this thing at this place, time, and
11 location.

12 Q And where do you provide for that
13 information?

14 A It's initially noted on a field arrest
15 form.

16 Q Is the field arrest form signed by the
17 officer?

18 A Yes, it is.

19 Q When the officer signs a field arrest
20 form, they're attesting to what specifically?

21 A That this person did this thing at this
22 time and this place.