

# EXHIBIT A

## TRIAL WITNESSES LIST<sup>1</sup>

1. Aldana-Bernier, Lilian
2. Broschart, Christopher
3. Bukunola, Okuwobi, LPN
4. Calderone, Virnaly RN
5. Cagno, David
6. Carter, Monique
7. Caughey, Timothy
8. Cooper, Alan – NYC 30(b)(6)
9. Duncan, Kurt
10. Eterno, John PhD
11. Ferrara, Joseph
12. Greene, Keith
13. Gough, William
14. Hacker, Scott
15. Halpren-Ruder, Daniel MD
16. Hanlon, Elise
17. Huffman, Rasheeda
18. Isakov, Isak
19. Kehoe, Kevin J. Det. Queens
20. James, Shantel
21. Lamstein, Catherine MD
22. Lauterborn, Theodore
23. Ledbetter, RN Glenda
24. Lubit, Roy MD
25. Lwin, MD Khin Mar
26. Maffia, Anthony, JHMC 30(b)(6)
27. Marino, Michael
28. Marquez, Jessica EMT
29. Matthews, Craig
30. Mauriello, Steven
31. Milone, William NYC 30(b)(6)
32. Nelson, Gerald
33. Nwaishienyi, Silas MD
34. Patel, Indira MD
35. Murpi, Michael –NYC 30(b)(6)
36. Polanco, Adhyl
37. Rinchart, Nedie, RN
38. Sangeniti, Salvatore, EMT
39. Sawyer, Frederick
40. Schoolcraft Adrian
41. Schoolcraft, Larry

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<sup>1</sup> This is a list of witnesses that the plaintiff may call or seek to call to trial.

42. Serrano, Pedro
43. Silverman, Eli PhD
44. Stremoyer, Carol
45. Stretmoyer, Ted
46. Stukes, Raymond
47. Tariq, Khwaja Khusro MD
48. Trainor, Timothy
49. Valenti, Dominic
50. Whalen, Bernard – NYC 30(b)(6)l
51. Weiss, Steven
52. Witnesses Identified by Defendants
53. Witnesses Required to Authenticate Exhibits
54. Wittman, David
55. Woodruff, Brian RN
56. Yeager, Robert

	<b>PLAINTIFF'S TRIAL EXHIBTS<sup>1</sup></b>
<b>PTX</b>	<b>Description</b>
1	Lauterborn Memo 10-31-09 (PDX 16)
2	Fitness for Duty Report 10-31-09 by Lauterborn (PDX 24)
3	Fitness for Duty Report by Broschart (PDX 134)
4	Brown Letter to Mauriello 3-1-09 (PDX 22; PMX 8; PDX 57))
5	Command Disciplines Issued to Schoolcraft in 2009 (PMX 9; PDX 168)
6	Schoolcraft Report 8-20-09 to IAB re Caughey and Weiss (PDX 40; PMX 15)
7	Schoolcraft Performance Evaluations (PMX 1)
8	Schoolcraft Report, dated 9-2-09 (PMX 14; PDX 58)
9	Schoolcraft Sick Report 10-31-09 (PDX 26)
10	Schoolcraft Monthly Activity Logs (PMX 5; PDX 21)
11	Schoolcraft Memo to Mauriello 9-2-09 re request to appeal (PDX 13)
12	Crime Numbers for October 31, 2009 (POX 45)
13	Cagno Report 9-2-09 re Schoolcraft Report (NYC 4316-19)
14	Yeager Memo Book (NYC 3724-26)
15	Caughey Memorandum, dated 10-19-09 (PMX 17)
16	IAB Log on Menacing (POX 57)
17	Handwritten Notes of Queens DA Interview of Lauterborn 10-13-11 (PDX 23)
18	Memo on Huffman Interview by QAD (NYC 5183-5184)
19	Notice Placing Schoolcraft on Restricted Duty (NYC 3005 & 3010)

<sup>1</sup> These exhibits, recordings and other evidence are being identified in the list subject to redaction on relevancy or undue prejudice grounds or in accordance with the plaintiff's objections to the admissibility of certain portions therein and/or in accordance with the Court's evidentiary rulings at and before trial.

20	Report to IAB by Duncan (POX 7)
21	Lamstein Handwritten Notes (PDX 29) (D000282-87)
22	Schoolcraft W-2s for 2005-2008
23	Hertzel Sure, M.D. Records (to be subpoenaed)
24	Forest Hills Medical Record (to be subpoenaed)
25	Huffman Roll Call (PDX 64)
26	Huffman Interview Memo by Scott (PDX 63)
27	Event Timeline (PDX 39)
28	Operations Incident Report 10-31-09 (PDX 27)
29	Schoolcraft Memo Book (PDX 44) (D00189-238)
30	Schoolcraft Memo Book for 8-11-09 to 10-31-09 (PDX 45) (NYC 8614-55)
31	Intentionally Deleted
33	IAB Campisi reprimand of Mauriello 10-28-08 (PDX 49)
34	Roll Call Transcripts on Mauriello (PDX 50)
35	Gough Investigative Report 2-12-10 (PDX 99)
36	Intentionally Deleted
37	Yeager ESU Report 11-1-09 (NYC 3723)
38	Performance Monitoring Memo on Schoolcraft 10-14-09 (PDX 59)
39	Mauriello Memo on Performance Monitoring (PDX 60)
40	Roll Call by Huffman 10-12-09 (PDX 64)
41	Command Log for 81 <sup>st</sup> Precinct on 10-31-09 (PDX 62)
42	IAB Investigative Findings 2-13-13 (PDX 37)
43	Intentionally Deleted
44	911 Sprint Report for 10-31-09 (PDX 66)

45	Lamstein File on Schoolcraft (PDX 68)
46	Report by BNIU (PDX 76)
47	Aided System Search Report (PDX 80)
48	911 Sprint Report for 10-31-09 (PDX 81)
49	BNUI Email re Upstate Visits (PDX 82)
50	Caughey Report to IAB re Schoolcraft Benefits Application (PDX 89)
51	IAB Report on Caughey Report on Schoolcraft (PDX 91)
52	BNUI Report on Gough and Duncan Upstate Trip on 1-20-10 (PDX 95)
53	Trainor Report on Request to Mauriello to Seal Schoolcraft's Lockers (PDX 97)
54	BNIU Report on Gough and Duncan Upstate Trip on 2-12-10 (PDX 99)
55	BNIU Report on Certified Mailing of Notice to Schoolcraft on 6-17-10 (PDX 101)
56	Intentionally Deleted
57	Duncan Report to IAB 10-31-09 re Schoolcraft Suspension (PDX 114)
58	James Memo Book for 11-1-09 (PDX 117)
59	Leader Herald Article on Schoolcrafts (PDX 126)
60	BNIU Report on Duncan et al upstate trip on 1-13-10 (PDX 138)
61	Devino Fax of Appeal Request 6-24-10 (PDX 153)
62	Activity for 81 <sup>st</sup> Precinct Police Officers: Arrests, Summons and 250s (PDX 161)
63	IAB Summary of Patrol Guide on Investigations (PDX 166) (NYC 12656-58)
64	QAD Report (PDX 169) [redacted]
65	IAB Report (PDX 170) [redacted]
66	Confidential Attorney Eyes Only Productions filed under seal (PMX 16; PMX 144 & 170; PDX 169)
67	Lamstein Notes (PMX 22; PDX 29)

68	Intentionally Deleted
69	Intentionally Deleted
70	IAB Memo on Nelson (POX 6)
71	Intentionally Deleted
72	Memo by BNIU (POX 15; PDX 82)
73	Intentionally Deleted
74	Intentionally Deleted
75	Operation Report (POX 27; PDX 27)
76	911 Sprint Report (POX 28; PDX 66)
77	ESU Report (NYC 3535; part of POX 30)
78	Scott Memo, dated 11-3-09 (POX 33)
79	Mollen Commission Report (excerpts) (POX 36)
80	Intentionally Omitted
81	IAB Police Corruption Report (POX 38)
82	Intentionally Deleted
83	Charges and Specification and Mailing (POX 43)
84	Roll Call Transcripts (POX 58; PDX 50)
85	Schoolcraft Oath of Office, dated 7-1-02 (D00001)
86	Expense Report for 12-11-09 trip to Johnstown (425 miles) (D001763)
87	Request for Hostage Negotiation Team 10-31-09 at 21:35 for barricaded EDP (NYC 2285-87)
88	Intentionally Deleted
89	Intentionally Deleted
90	Intentionally Deleted
91	Intentionally Deleted

92	Sadowski Memo Book (NYC 3707-09)
93	Arbitration Opinion and Award (NYC 12475-12502)
94	Charges and Specification (POX 8)
95	Schoolcraft Memo Book (POX 22; PDX 45)
96	Broschart Memo Book (PDX 135) (D505-507)
97	Property Voucher for Keys (PDX 136)
98	Photo of Hospital (PDX 118)
99	Photo of Hospital (PDX 119)
100	Photo of Hospital (PDX 120)
101	Hospital Nursing Notes (PDX 121)
102	Intentionally Deleted
103	Lwin Consultation Report (PDX 123)
104	Command Log for 81 <sup>st</sup> Precinct for October 27, 2009

150	PG 205-56-Evaluation Procedures (PDX 6)
151	PG 205-48 MOS Evaluations
152	PG 205-07 – Monthly/Quarterly Rating System (PDX 15)
154	PG 202-15 – ICO duties (PDX 35)
155	PG 320-31 – ICO Assignment Process (PDX 36)
155	PG 202-09 – CO duties (PDX 56)
156	PG 205-18 Absent Without Leave (PDX 3)
157	PG 205-01 Reporting Sick (PDX 4)
158	PG 205-58-Appeal Procedures (PDX 5)



159	PG 216-05-EDP Rules (PDX 7)
160	PG 206-13 – Interrogation of MOS (PDX 158)
161	Performance Guide for NYPD Captain to Deputy Chief (PDX 159)
162	PG 205-238 (POX 34; PDX 163)
163	PG – Excessive Force Rules
200	JHMC Chart (PDX 69)
201	JHMC Policy on § 9.39 (PDX 70)
202	JHMC Policy re Restrictions on Visits, etc (PDX 72)
203	JHMC Policy – Psych Unit Rules (PDX 74)
204	Nursing Note 11-1-09 2 am & 5:54 am (PDX 121)
205	JHMC ER Nursing Notes (from Chart)
206	PCR Report (darker version) (PDX 125)
207	JHMC Emergency Admission Procedures (PDX 130)
208	Memo (POX 16; PDX 92)
209	JHMC Policy of Use of Restraints (PDX 152)
210	Section 9.39 Form Signed by Bernier and Isakov (PDX 171)
211	Jamaica Hospital Medical File or Chart (PMX 69; PDX 69)
212	Emergency Admission Form (PMX 38; PDX 171)

213	Jamaica Hospital Manual (PMX 39; PDX 70)
214	Form 9.39 executed by Dr. Bernier and Dr. Isakov (POX 19; PDX 171)
215	Intentionally Deleted
216	JHMC Restraint Policy (POX 49)
217	Form 9.39 (POX 54; PDX 171)

300	Home Invasion Recording and Transcript <sup>2</sup>
301	Google Maps Screen Shots (POX 31)
302	Photos: Schoolcraft Allowed to Handle Guns after Gun Removal
303	Lauterborn-L. Schoolcraft Recording and Transcript
304	Appeal Meeting 2-25-09 Recording
305	Photos – 81st Precinct (PDX 61)
306	Lauterborn-Schoolcraft Recording re Reporting Retaliation
307	Photo of Gurney (PDX 120)
308	IAB Report on Menacing 10-31-09
309	Mascol-Schoolcraft Reporting re Activity; CD # 70/Lt. Mascol Audacity_Cut_Watch_20Feb2009_LtMascol.wav
310	Photos of Schoolcraft Lockers (PDX 142)
311	Compact Disc with Recordings (PMX 11)

<sup>2</sup> The transcripts of various recordings are being provided and/or identified without prejudice to the rights of the plaintiff to provide further information about the content of the recordings by testimony, exhibits, or other evidence, including enhancement on the recordings or portions thereof.

312	Conversation with Huffman (excerpts from 10-31-09 recording)
313	CD of Recordings (POX 5)
314	Ferrara Recording re Rat Upstate
315	Photos of JHMC – JLS 190, 191,202, 205, 206, 252, 260, 261, 299, 320
316	O'Hare NYPD Upstate Visit; WS.331M-11December2009_NYPD_JPD_Harrassment.wma
317	Compstat Video 9-20-07 (CD #17); 10-12-09 (CD #12) (POX 44)
318	IAB Conversation 9-2-09
319	Handcuffs – Silver
320	Intentionally Deleted
321	Handcuffs – Black
322	Voice Message by Lamstein 10-31-09- (CD# 1 DS500011) & (CD # 61; DS.50_31OCTOBER2009_Dr. Lamstin_IAB_6NOV2009
323	Diagram of Apartment
324	Johnstown PD – PO Millias Visit 12-7-09; CD # 71 WS.33M_7Dec09_1740hrs_JohnstonPoliceDept_P.O.Millian_No. 1.WMA
325	Photos of the 81st Precinct – JLS 0050, 70, 75, 108, 109
326	Photos of the Glendale House – JLS 348, 349
327	COMPSTAT Video – Numbers and Activity
328	COMPSTAT Video re Halloween Night
329	Photo of Olympus Record
330	Yeager Interview – CD # 5
331	Home Surveillance Videos – CD # 22
332	Home Surveillance Videos – CD # 32
333	Intentionally Deleted
334	Intentionally Deleted

335	District Surgeon Meeting on 4-4-09 - WS.331M_Saturday_4APRIL2009_DistrictSurgeon1Lefr
336	O'Hare Banging on Door 12-11-09 – CD # 71
337	Roll Call Excerpts
338	Schoolcraft Tape Recordings – CD # 90 Copy of Schoolcraft CD

400 <sup>3</sup>	Marino CPI (PDX 8)
401	Marino IAB Resume (PDX 11)
402	Mauriello PG Tr. 8-11-10 (PDX 47)
403	Marino PG (PDX 1)
404	Mauriello Floyd Tr. 4-2-13 (PDX 48)
405	Caughey PPI (PDX 38)
406	Mauriello History (iPro) (PDX 54)
407	Mauriello IAB Resume (PDX 55)
408	Caughey PG Transcript (PDX 33)
409	Lauterborn PG Transcript 8-11-10 (PDX 18)
410	Marino Floyd TC (PDX 2)
411	Mauriello Tr. in Floyd v City of New York (PMX 35; PDX 48)
412	Quota Memo for Sergeant Lurch re Arbitration
413	Lamstein Intake Forms and Notes
414	NYPD PES File Documents (PDX 68)
415	Lamstein Declaration

<sup>3</sup> Exhibits in the 400 series are identified as impeachment exhibits and by identifying these exhibitis plaintiff is not stating that these are all the impeachment documents that may be used at trial and plaintiff reserves the right to use other documents for impeachment purposes as well as for rebuttal.

416	Lamstein Errata Sheet
417	Lamstein Interview Summary (NYC 4556-58)
418	Mauriello Affidavit (Dkt # 358), dated 12-22-14
419	Mauriello Affidavit (Dkt. # 385), dated 2-12-15
420	Marino Command Discipline 11-24-10 (NYC D 00452-53)
421	Decision on Marino Charges (NYC 12965-13095)
422	Scott Background Check on Marino (PDX 10)
423	Team Leader Case Review (PDX 107)
424	Lauterborn IAB Transcript (POX 4; PDX 18)
425	Caughey IAB Transcript (POX 23; PDX 33)
426	Mauriello PG Transcript (POX 25; PDX 47)
427	Lauterborn Interview Memo re 9-17-09 Interview (NYC 5786-89)
428	Yeager Interview Memo (NYC 6023-24)
429	Scott Report of James Interview (PDX 122)
430	Lamstein-Schoolcraft Meeting on 10-27-09 – CD # 65 WS.331M_27OCTOBER2009_3rdAppt-1Lefrak_Dr. Lamstein
431	Lamstein-Schoolcraft Meeting on 7-27-09 – CD # 67 DS.50_27JULY2009_MONDAY_Dr.Lamstein_SecondOrderedAppearance