

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ADRIAN SCHOOLCRAFT,

10-cv-6005 (RWS)

Plaintiff,

-against-

*REPLY MEMORANDUM OF
LAW IN SUPPORT OF
MOTION FOR A STAY*

THE CITY OF NEW YORK, *et al.*,

Defendants.
-----X

Argument

Plaintiff Adrian Schoolcraft (“Officer Schoolcraft”) submits this reply memorandum of law in support of his motion for a stay of all further administrative proceedings by the City of New York (the “City”) and the New York City Police Department (“NYPD”) against him.

*The City Fails to Address Direct
Authority Defeating its Younger Argument.*

The City argues that this Court is required under the *Younger* abstention doctrine to dissolve the stay it issued on June 10, 2013. The City is wrong. Indeed, it fails to address two important decisions by District Courts in this Circuit that rejected the same *Younger* argument made by the City and granted motions staying NYPD administrative proceedings against police officers pending a determination of those police officers’ federal employment actions

against the NYPD.

First, in *Alvarez v. The City of New York*, 31 F. Supp. 2d 334 (S.D.N.Y. 1998), the District Court granted an NYPD police officer's motion for a stay of NYPD administrative proceedings against the officer, pending a determination of his retaliation claims in federal court. The court granted the stay because the officer's "ability to prosecute [the claims in the pending federal action] is actually being impaired by the NYPD's disciplinary proceedings and he is likely to continue to suffer this injury if the disciplinary proceedings are not enjoined." *Id.* at 345. Indeed, the *Alvarez* court aptly ruled: "the NYPD may not take the matter into its own hands. Rather, the NYPD should attack the allegations in this Court, within the context of the lawsuit." *Id.* at 346.

The *Alvarez* court also expressly considered and rejected the *Younger* abstention argument that the City is again making in this action. Although a federal court generally ought not to interfere with the NYPD's internal personnel matters, the court ruled that the NYPD's disciplinary proceedings were interfering with the orderly functions of the proceedings in the District Court. For that reason, "the considerations of comity and federalism that would ordinarily weigh against federal intervention into a pending departmental inquiry

do not come into play. *Id.*¹ See also 28 U.S.C. § 2283 (district court has the power to enjoin state court proceedings in aid of its jurisdiction).

To the same effect is *Mullins v. The City of New York*, 554 F. Supp 2d 483 (S.D.N.Y. 2008), where the District Court granted an NYPD sergeant's motion for a preliminary injunction restraining the NYPD from pursuing disciplinary proceedings against the sergeant based on his testimony or participation as a plaintiff in a pending federal action against the City of New York for federal wage and hour violations. Following *Alvarez, supra*, the *Mullins* court held that the NYPD's disciplinary actions taken against the sergeant presented a threat of irreparable harm because the NYPD charges could lead to disciplinary action, including termination of employment. Irreparable harm was also established because the administrative interrogation of the sergeant would be by NYPD superior officers, who are management of the NYPD, and the NYPD was a party litigant in the federal action. Finally, irreparable harm was established because the "interrogation [of the sergeant] essentially gave the NYPD a second chance

¹ Although the City in its memorandum of law cites to a prior decision by the *Alvarez* court in support of its opposition to this motion for a stay, it fails to address the relevant subsequent history of that case in its memorandum of law. Moreover, the prior *Alvarez* decision is not controlling because in that prior decision the NYPD had only instituted an investigation into the possible misuse of confidential information by the officer whereas in the later decision, the NYPD commenced disciplinary proceedings against the officer for purportedly making false statements. *Alvarez*, 31 F. Supp. 2d at 344.

at deposing [the plaintiff]. *Id.* at 490. Thus, absent injunctive relief, the NYPD would “compel additional testimony on the very topics at issue in this pending litigation, but outside of the bounds of the judicial process and on defendants’ terms.” *Id.* at 491.

The *Mullins* court also rejected the argument that the threatened harm was speculative because the mere initiation of an investigation itself presents a risk of irreparable harm. *Id.* Here, the harm to Officer Schoolcraft is more obvious than in *Mullins* because the NYPD has already filed Charges against Officer Schoolcraft and recently scheduled its administrative trial against him.²

The court in *Mullins* also noted the blatant unfairness of permitting the NYPD to use its own administrative proceedings to its advantage:

“To permit a party to be its own jury is inherently unjust.”

Id. at 492.

It is indeed remarkable that the City has filed an extensive memorandum of law in opposition to this motion and yet it fails to address the patent unfairness of

² The Charges against Officer Schoolcraft relate directly to the issues in this action by alleging that on the day and night of his abduction on October 31, 2013, Officer Schoolcraft: (1) failed to comply with an order that day to remain at his tour of duty at the 81st Precinct; (2) failed to return to the 81st Precinct that night after being ordered to do so; (3) failed to open his residence door that night in violation of his duty to cooperate with an investigation; and (4) was and has been absent from duty without leave since October 31, 2009. (*See Motion Exh. 2.*)

permitting it to be the prosecutor, judge and the jury on its own liability to Officer Schoolcraft. While the specter of collateral estoppel is an additional ground for granting this motion – particularly in the light of the City’s acknowledgement that the issue is unsettled and its unwillingness to stipulate around the issue – that concern is not the only basis for this motion, as the decisions in *Alvarez* and *Mullins* make clear.

The City Defendant also suggests half-heartedly that Officer Schoolcraft has not shown a likelihood of success on the merits or sufficiently serious questions going to the merits to make them fair ground for litigation and a balance of hardships tipping decidedly toward the party requesting the preliminary relief. (City Mem. at p. 2-3.) As the Court is well aware from the prior proceedings in this action, the detailed allegations in the Second Amended Complaint and the dramatic recordings of the unlawful and unjustified assault and abduction of Officer Schoolcraft from his home on October 31, 2009 demonstrate that there is a likelihood of success on the merits and serious questions going to the merits of this action.³

³ Second Amended Complaint, Dkt. # 103; *see also* a transcript of the unenhanced recording of October 31, 2009, attached hereto as Exhibit 1. Excerpts of the audio recording from the evening of October 31, 2009 are also available at <http://www.villagevoice.com/2010-06-15/news/adrian-school-craft-nypd-tapes-whistleblower/> and <http://www.thisamericanlife.org/radio-archives/episode/414/right-to-remain-silent?act=2#play>. In addition, a CD

Younger and its Progeny Does Not Support the City's Argument.

The City relies primarily on *Younger* and its progeny to support its position that the stay should be dissolved. While *Alvarez* and *Mullins* demonstrate that *Younger* is not a bar to a stay in this case, there are several other reasons why the Court should reject the City's *Younger* argument.

First, *Younger* abstention applies only where the state proceedings implicate important state interests. *Middlesex Co. Ethics Comm. v. Garden State Bar Assn.*, 457 U.S. 423, 432 (1982). Here, the state interest is that of the City of New York, and more important, the City of New York and the NYPD failed to take any action on its administrative charges against Officer Schoolcraft, which remained dormant for over three *years*. Thus, the City cannot argue persuasively that it is seeking now to vindicate important government interests because its extensive delay belies the claim of any important governmental interest in having an administrative trial against Officer Schoolcraft. Indeed, the City does not even try to articulate *any* strong governmental interest that is required to implicate *Younger* abstention. Nor does it address in any way its three-year delay in proceeding with its administrative

recording of that recording is enclosed for the Court. The transcript and the recording demonstrate that the NYPD had no basis for declaring Officer Schoolcraft an emotionally disturbed person or a danger to himself or others and that he was assaulted, arrested and locked up in a psychiatric hospital because he had recently reported unlawful conduct to the NYPD's Internal Affairs Bureau, unlawful conduct that was subsequently confirmed by the NYPD's Quality Assurance Division.

charges against Officer Schoolcraft.

Second, *Younger* abstention applies, provided that there is an adequate opportunity in the state proceeding to address the constitutional issues being raised in the federal court. *Middlesex*, 457 U.S. at 432. Here, the NYPD proceedings will be conducted by the NYPD and the determinations of fact and law will be made by the NYPD's Commissioner Kelly. These facts make clear that the NYPD's administrative trial process cannot provide an adequate opportunity for Officer Schoolcraft to obtain a fair hearing before a *neutral* arbitrator. While the City says that Officer Schoolcraft has no evidence of actual bias by Commissioner Kelly, that argument forces an extreme departure from common sense. Moreover, the point here is not that Officer Schoolcraft has evidence of bias – indeed, it is highly unlikely that the NYPD during the administrative process would permit Officer Schoolcraft to question Commissioner Kelly on the issue. The point is that Officer Schoolcraft cannot and will not be able to secure review by a *neutral* arbitrator precisely because the NYPD is a defendant in this action.

In considering whether Officer Schoolcraft can get a fair hearing before a neutral arbitrator, the Court should also take judicial notice of the fact that Officer Schoolcraft's tape recordings of NYPD roll calls have been used as dramatic evidence against the NYPD in two other significant actions pending in the Southern District of New York: the recently tried stop-and-frisk case, *Floyd v. The*

City of New York, 08-cv-1034 (SAS) and this Court's stop and frisk case, *Stinson v. The City of New York*, 10-cv-4228 (RWS). Indeed, in *Stinson* Officer Schoolcraft's tape recordings were cited by the Court in its decision granting the plaintiffs' motion for class certification. *Stinson v. The City of New York*, 282 F.R.D. 360, 366 (S.D.N.Y. 2012). These facts, we submit, demonstrate that Officer Schoolcraft cannot obtain a fair hearing before the NYPD where the NYPD acts as the prosecutor, the judge and the jury.

Third, there are two exceptions to *Younger* abstention that apply in this case: bad faith and waiver. First, where there is a genuine question about whether the state proceeding was commenced in bad faith or for the purpose of harassing the plaintiff, *Younger* does not apply. *Kern v. Clark*, 331 F. 3d 9, 12 (2d Cir. 2003) (remanding proceedings to the lower court to conduct an evidentiary hearing on the issue of bad faith). Here, the NYPD has admitted that it now "prefers" to conduct its administrative trial against Officer Schoolcraft, even though it also claims that a trial is not needed and that it has the right under the New York City Administrative Code to take employment action against him without a trial. (Motion Exhibit 2 at p. 2.) This is evidence that the City's recent push for an administrative trial is in bad faith and was instituted to harass Officer Schoolcraft. Moreover, in the light of Officer Schoolcraft's allegations against the NYPD that have surfaced in this case and in two other related cases (*Floyd* and *Stinson*), and in the light of the fact

that the NYPD failed to proceed for over three years with its charges against Officer Schoolcraft, there is a serious question of fact on the issue of whether the NYPD has decided to pursue these administrative claims for the purpose of harassing Officer Schoolcraft. *See Diamond "D" Const. v. McGowan*, 282 F. 3d 191, 198-201 (2nd Cir. 2002) (bad faith may exist where state proceedings were initiated for a retaliatory purpose). At the very least, therefore, an evidentiary hearing is required. *Kern, supra*.

Second, *Younger* abstention can be waived. *Dairy Mart Convenience Store, Inc. v. Nickel*, 411 F. 3d 367, 373 (2d Cir. 2005). Here, the City Defendant failed to raise the issue as a defense in its pleadings,⁴ and, although this action has been pending before this Court for over three years since its commencement on August 10, 2010, the City Defendant has not in any other fashion previously raised *Younger* abstention or even informed the Court of the existence of its administrative proceedings. These facts show waiver.

These facts also demonstrate that the equities do not support the City Defendant's position, and that the City Defendant cannot show any actual prejudice flowing from the stay, which would only continue a *de facto status quo* that has been in existence for nearly four years. Similarly, the City Defendant's argument that a stay would "impede judicial economy" or "drain resources" makes no sense

⁴City Defendants' Answer to Second Amended Complaint ¶¶ 437-47 (Dkt. # 110).

because its position would require *two* trials, not one.

As the Court noted at the June 10, 2013 conference, the Court has the power to issue a stay in furtherance of its jurisdiction. *See* 28 U.S.C. § 2283 (“A court of the United States may not grant an injunction to stay a proceedings in a State court except as expressly authorized by Act of Congress, or where necessary in aid of its jurisdiction, or to protect or effectuate its judgments.”). In addition, since this is an action commenced pursuant to 42 U.S.C. § 1983, the law is settled that Section 1983 actions are actions for which Congress has provided an express exception to the limitation in 28 U.S.C. § 2283 on federal court injunctions against state court proceedings. *Mitchum v. Foster*, 407 U.S. 225, 243 (1972).

The City’s Argument Regarding Collateral Estoppel Also Makes No Sense.

Although the City acknowledges that there is a potential that its own determinations during the course of the NYPD administrative trial may have *collateral estoppel* effect, its argument that that issue should be addressed only after its administrative trial misses the point of this motion. Since there is a *possibility* that the NYPD trial could have some preclusive effect on this federal action, that very risk is one of the compelling reasons for issuing a stay.


Finally, the City Defendant’s argument (City Mem. at p. 11) that the Court should decline to extend the stay “since preclusion of certain issues will streamline the trial and preserve judicial resources” is manifest nonsense. Permitting a civil

defendant to circumvent a plaintiff's rights to discovery and to a fair trial before an unbiased court and jury by having the defendant act as the trier of the facts and the law would simply put an end to the system of civil justice in this country.

Conclusion

Officer Schoolcraft respectfully requests that the Court continue the June 10, 2013 stay of the NYPD administrative proceedings pending a final determination of the issues in this action.

Dated: June 19, 2013

s/NBS

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EXHIBIT 1

HOME INVASION HALLOWEEN NIGHT (Transcribed)

Digital Voice Recorder: Olympus DS-50

OCTOBER 31, 2009

2138 hours

SCHOOLCRAFT: alright... it's 10/31... 2009... E.S.U. is here... 31 October 2009

 <NOISE: E.S.U. banging on door>

E.S.U: Adrian... E.S.U. <INAUDIBLE> are you there... <INAUDIBLE>
Adrian... Adrian...

 <Apartment door opened with key>

E.S.U: ADRIAN... <INAUDIBLE>... on the bed... <INAUDIBLE>... ADRIAN... POLICE
DEPARTMENT BUDDY... Let me see your hands... you alright...

SCHOOLCRAFT: Ya, I think so?

E.S.U: Alright... Everybodys worried about ya... they haven't heard from ya...

SCHOOLCRAFT: Who's worried about me?

E.S.U: YOU'RE BOSS!

D.C. MARINO: Adrian, don't hear us knocking on this door for a couple hours?

SCHOOLCRAFT: <INAUDIBLE>... Nyquil...

E.S.U: Adrian... Sit-Up...

D.C. MARINO: Adrian... you didn't hear us knocking on that door?

SCHOOLCRAFT: No...

D.C. MARINO: For the last couple hours?

SCHOOLCRAFT: No... Why would I expect anyone to knock on my door Chief?

D.C. MARINO: I don't know Adrian but if you hear somebody knocking normally you get up and answer
it they were kicking on that door loud and yelling.

SCHOOLCRAFT: I wasn't feeling well...

D.C. MARINO: you got... you got a million people downstairs worried about your welfare spending hours
out here worried about you... we've talked to your father... we've called your phone...

Cell-Phone: < 1 minute 43 second> "CALL FROM A.A.I. DAD"

SCHOOLCRAFT: What did my father say?

D.C. MARINO: I don't know Adrian I didn't talk to him personally... alright... sit-down... sit-down... Steve...

? Sorry guys

E.S.U: No... not at all

Capt. Lauterborn: Adrian... What happened today?

SCHOOLCRAFT: Wasn't feeling well, I left...

D.I. MAURIELLO: That's it, you weren't feeling well? The sergeant told you to stay, right?

SCHOOLCRAFT: No she didn't say anything... she was talking on a cell-phone...

D.I. MAURIELLO: You got everybody worried... worried about your safety... alright... were all...

SCHOOLCRAFT: Worried about what?

D.I. MAURIELLO: What do you mean worried about... they tried calling ya and and everybodys been calling ya... Capt. Lauterborns been callin ya... everybodys been callin ya... your fathers been callin ya... you're not answering... (Inaudible)... were worried something happened... that's what were worried about ... god forbid... you just walk out of the precinct... I say hello to ya... that was the last I saw ya... you know... that's what were worried about... your safety... your well-being...

SCHOOLCRAFT: Alright... I'm fine...

D.I. MAURIELLO: well your gonna come back to the precinct with us...

SCHOOLCRAFT: Well... if I'm forced to... It's against my will...

D.I. MAURIELLO: Against your will... Okay Teddy you can handle this...

Capt. LAUTERBORN: GET YOUR STUFF ON WHERE GOING BACK TO THE PRECINCT.

SCHOOLCRAFT: I'm not going back to the precinct...

Capt. LAUTERBORN: Adrian... your gonna go back to the precinct.

SCHOOLCRAFT: FOR?

Capt. LAUTERBORN: Cause were gonna do it the right way... you can't just walk out...

SCHOOLCRAFT: DO... DO WHAT?

Capt. LAUTERBORN: YOU CAN'T JUST WALK OUT OF COMMAND...

SCHOOLCRAFT: WHAT'S GONNA BE DONE IF I GO TO THE 81?

Capt. LAUTERBORN: What's gonna be done? Where gonna go investigate why you left...

SCHOOLCRAFT: I'll tell you why I left... I was feeling sick...

Capt. LAUTERBORN: Adrian... that's not the reason why you leave... Alright... you know that... you just don't put a thing on the desk... you ask for permission...

SCHOOLCRAFT: I DID ASK PERMISSION...

Capt. LAUTERBORN: NO YA DIDN'T...

SCHOOLCRAFT: SHE DENIED IT...

Capt. LAUTERBORN: Alright... so then... you can't leave... you weren't given permission...

SCHOOLCRAFT: <inaudible>... I wasn't feeling well...

Capt. LAUTERBORN: Right... if she denied it... THAT'S IT... YOU HAVE TO SIT THERE AND WAIT UNTIL YOUR PERMISSION IS GRANTED... Alright... If it's that bad then you're gonna go to the hospital from the precinct... you know better than to just slap a f... sick report on a desk and walk out...

SCHOOLCRAFT: I didn't do that... she... she embellished... she was on the cell-phone.

Capt. LAUTERBORN: Alright... what did you do... you sat it down... she told you you can't leave... and you left anyway right...

SCHOOLCRAFT: I said I was going sick...

Capt. LAUTERBORN: And you left anyway? She told you you can't leave? Alright... you can't leave... that's the way... that's the way it rolls... you can't go... alright... alright... so we have to go back... so get your clothes on... whatever you have to do... people have been calling ya all day... I talked to your father... alright...

SCHOOLCRAFT: <INAUDIBLE>... who are you guys?

Lt. Goff (?spelling?): I'M LIEUTENANT GOFF (?spelling?) THIS IS SERGEANT DUNCAN... WERE FROM BROOKLYN NORTH INVESTIGATIONS... THE CAPTAIN'S ORDERING YOU BACK TO THE COMMAND... DO YOU UNDERSTAND...? SO YOU'RE COMING WITH US...

SCHOOLCRAFT: Coming with who?

Lt. Goff (?spelling?): YOUR COMING WITH US...

SCHOOLCRAFT: AM I UNDER ARREST?

Lt. Goff: YOU'RE NOT UNDER ARREST... YOU'RE BEING ORDERED...

SCHOOLCRAFT: AM I BEING CHARGED?

Lt. Goff (?spelling?): NO... NO... NO... YOU'RE BEING ORDERED BACK TO THE COMMAND...

SCHOOLCRAFT: WHY?

Lt. Goff (?spelling?): ARE YOU REFUSING...? ARE YOU... I DON'T HAVE TO GIVE YOU AN ANSWER...
I'M A SUPERVISOR IN THE NEW YORK CITY POLA... POLICE DEPARTMENT

SCHOOLCRAFT: Alright... I'll go...

Lt. Goff (?spelling?): IF YOU REFUSE... GIVE ME YOUR I.D. CARD

SCHOOLCRAFT: I'LL GO BUT IT'S AGAINST MY WILL...

Lt. GOFF (?spelling?): NO... THERE'S NO AGAINST YOUR WILL... ARE YOU REFUSING? ARE YOU
REFUSING TO...?

SCHOOLCRAFT: NO... I'LL GO... BUT IT'S AGAINST MY WILL...

Lt. Goff (?spelling?): OK... THEN GET DRESSED AND LETS GO...

SCHOOLCRAFT: IT IS AGAINST MY WILL...

Lt. Goff (?spelling?): YOU'RE BEING ORDERED BACK...

SCHOOLCRAFT: YOU'RE ORDERING ME TO LEAVE MY HOUSE...

Lt. Goff (?spelling?): I'M ORDERING YOU BACK TO WORK... WHERE YOU LEFT WITHOUT
PERMISSION... EARLER TODAY...

? ALRIGHT?

SCHOOLCRAFT: LIUTENANT GOFF?

Lt. Goff (?spelling?): YES... LIUTENANT GOFF... BROOKLYN NORTH INVESTIGATIONS...

<>
<INAUDIBLE> < 5 minute 15 second >
<>

Capt. LAUTERBORN: COME ON... LET'S GO...

SCHOOLCRAFT: ALRIGHT... I'LL BE OUT... I'LL GET DRESSED... my shoes...

Capt. LAUTERBORN: THE AH... CHRIS YOU WANNA NOTIFY THE BORROUGH... TELL EM UH... NOTIFY
EVERBODY ELSE...

Lt. BROSCART: YEP... I GOT YA...

Capt. LAUTERBORN: ALRIGHT...

Cell-Phone: <6 Minute 15 second> "CALL FROM A.A.1. DAD"
Larry Schoolcraft (Father) calling (Son) Adrian Schoolcraft's Cell-Phone.

SCHOOLCRAFT: Ya... There in... I just... I woke up... their... I have to go back to the 81... In my apartment... being forced to get dressed... Ya... how do I do that... everyone... which one... yes... E.S.U... ya... ya... uh ya... put your hands up... ya...

Capt. LAUTERBORN: Adrian... you can carry that conversation on in the car... OK pal... we gotta go...

SCHOOLCRAFT: ah... I'm not feeling well... I'm just sitting down...

? You're not feeling well?

? Alright we got an ambulance downstairs...

? You like some medical aid...

SCHOOLCRAFT: YA...

? OK...

Capt. LAUTERBORN: You have keys?

SCHOOLCRAFT: <INAUDIBLE>... he's right here... my father...

Capt. LAUTERBORN: your father? Yes Sir Mr. Schoolcraft...

Lt. Goff (?spelling?): Officer Schoolcraft... can I have your identification card please... your department I.D.?

Capt. LAUTERBORN: I told you what was going on earlier...

Lt. Goff (?spelling?): Thank You... you could have the holder... Thank You...

Capt. LAUTERBORN: Ya... I am... He's going... He's going to a hospital... he doesn't feel well... <9 minute 40 second > I don't know I have to see where ahhh... EMERGENCY SERVICES take ahhh... E.M.S. is gonna take him... YEP... I'm sorry? Ya... I gave you the number earlier... the number you called earlier... No I don't have one yet, but there will be one... OK... Alright...

E.M.S. (MALE): What's going on tonight?

Capt. LAUTERBORN: OK Sir...

SCHOOLCRAFT: NO... I was just having stomach pains... their embellishing this...

E.M.S. (MALE): Stomach Pains?

SCHOOLCRAFT: ya...

E.M.S. (MALE): Alright you got any kind of medical... <INAUDIBLE>

Capt. LAUTERBORN: Hold on one second...

SCHOOLCRAFT: no...

E.M.S. (MALE): You don't take any medicines for anything?

SCHOOLCRAFT: No... I just took some Nyquil for the... the nose...

E.M.S. (MALE): OK... let's check your blood pressure... will...

SCHOOLCRAFT: ok...

E.M.S. (MALE): ALRIGHT...

D.C. MARINO: what's going on?

Capt. LAUTERBORN: ahh he'sss... now he's... going sick...

D.C. MARINO: I thought he did go sick today?

SCHOOLCRAFT: I did go sick...

D.C. MARINO: Right... then the Sergeant asked you to stay for a few minutes... Right?... because she had to speak to you first... SO YOU DISOBEYED AN ORDER... and now you have...

SCHOOLCRAFT: <INAUDIBLE>

D.C. MARINO: YES YOU DID...

SCHOOLCRAFT: she didn't... she was on her cell-phone...

D.C. MARINO: LISTEN TO ME... LISTEN TO ME... I'M A CHIEF IN THE NEW YORK CITY POLICE DEPARTMENT... YOU'RE A POLICE OFFICER AND THEN YOU HAVE UMTEEN PEOPLE OUT HERE STANDING IN THE RAIN AND DON'T TELL ME YOU DON'T HEAR THE KNOCKING ON THE DOOR... OK... AND WHEN THEY CALL YOUR CELL-PHONE AND YOU HANG- UP... SO THIS IS WHATS GONNA HAPPEN MY FRIEND... YOU'VE DISOBEYED AN ORDER... AND THE WAY YOUR ACTING IS... IS... NOT RIGHT AT... AT... AT THE VERY LEAST...

< 10 minute 55 second >

SCHOOLCRAFT: CHIEF... IF YOU WERE WOKEN UP IN YOUR HOUSE?

D.C. MARINO: STOP RIGHT THERE!

SCHOOLCRAFT: HOW WOULD YOU BEHAVE?

D.C. MARINO: STOP RIGHT THERE! SON... SON... I'M DO'IN THE TALKIN RIGHT NOW... NOT YOU...

SCHOOLCRAFT: IN MY APARTMENT?

D.C. MARINO: IN YOUR APARTMENT... YOU ARE GOING...

SCHOOLCRAFT: WHAT IS THIS... RUSSIA?

D.C. MARINO: YOU ARE GOING TO BE SUSPENDED... ALRIGHT... THAT'S WHAT'S GONNA HAPPEN... YOU CAN GO SEE THE SURGEON IF YOU'RE SICK... WE'LL GIVE YOU ALL THE MEDICAL ATTENTION YOU NEED... AT THE END OF IT YOU'RE SUSPENDED... SON...

<NOISE: Blood Pressure Cuff>

E.M.S. (MALE): PRESSURES LIKE... SKY-HIGH... ONE SIXTY OVER ONE TWENTY...

SCHOOLCRAFT: I'VE BEEN FEELING SHITTY ALL DAY...

E.M.S. (FEMALE): SAL... SAL... <from my living room where she has been conversing, whispering, with Lt. Goff (?spelling?) and Sgt. Duncan>

E.M.S. (MALE): Hmm... Hmm... Hmm... Hmm...

? <INAUDIBLE> ? <12 minute 12 second>

E.M.S. (MALE): YA... YOUR PULSE IS LIKE CRAZY... OFF THE TOP...

RADIO: 81 TO CITY-WIDE... <12 minute 22 second>

E.M.S. (MALE): LIKE... ONE FIFTEEN ON THE PULSE... ALRIGHT... I GOTTA TELL YA... YOU GOTTA GO TO THE HOSPITAL BRO... NOT WITH THAT KINDA OF PRESSURE... I CAN'T... I CAN'T IN GOOD FAITH LEAVE YOU HERE... WITH THAT KINDA PRESSURE... YOU UNDERSTAND THAT... RIGHT? WERE LOOKING OUT FOR YOUR BEST INTREST... I'M NOT... <INAUDIBLE> YOU KNOW? IT'S A DIFFERENT JOB... I'M LOOKING OUT FOR YOU... IF YOU'RE MY PATIENT... I NEED TO LOOK OUT FOR... OK? SO MY SUGGESTION IS YOU NEED TO COME WITH US... ALRIGHT?

SCHOOLCRAFT: alright...

E.M.S. (MALE): COOL? ALRIGHT...

<INAUDIBLE BACKGROUND TALKING> <12 minute 52 second >
<Male voice giving instructions to the FeMale E.M.S.>

E.M.S. (MALE): ALRIGHT... HE'S GONNA GO...

E.M.S. (FEMALE): hospital?

E.M.S. (MALE): YA... HE'S GOING TO THE HOSPITAL...

E.M.S. (FEMALE): <INAUDIBLE>

E.M.S. (MALE): UH... WE'LL TAKE HIM TO <INAUDIBLE>
< 12 minute 58 second >

E.M.S. (FEMALE): Luitenant Goff is that... <INAUDIBLE>

SCHOOLCRAFT: forest hills...

E.M.S. (MALE): WERE TAKIN THIS TO JAMAICA... RIGHT?

SCHOOLCRAFT: forest hills...

E.M.S. (FEMALE): FOREST HILLS? <to Sgt. Duncan and Lt. Goff>

E.M.S. (MALE): FOREST HILLS? <to female E.M.S.>

E.M.S. (FEMALE): <female E.M.S. naming off Queens Precincts> <INAUDIBLE>

E.M.S. (MALE): I DON'T KNOW?

E.M.S. (FEMALE): I think Jamaica would probably be... would be a better... choice than LaGuardia...

E.M.S. (MALE): YA... THE ONLY REASON I TELL YOU JAMAICA IS... UNDERSTAND... I'M... I'M... DON'T SHAKE YOUR HEAD ALREADY... LET ME EXPLAIN...

SCHOOLCRAFT: MY DOCTOR IS...

E.M.S. (MALE): I UNDERSTAND WHAT YOU'RE SAYING BUT... YOUR DOCTOR IS NOT GONNA COME OUT AND WAKE UP AND SAY YOU KNOW... THIS GENTLEMAN IS HERE...

E.M.S. (FEMALE): <INAUDIBLE> LaGuardia is not the...

E.M.S. (MALE): I HAVE TO TAKE YOU TO THE CLOSEST HOSPITAL... YOUR PRESSURE IS LIKE OFF THE TOP... YOUR PRESSURE IS... WAY... NORMAL PRESSURE IS ONE TWENTY OVER EIGHTY... YOUR PRESSURE IS LIKE...

SCHOOLCRAFT: it's always like that...

E.M.S. (MALE): THEN THAT'S A PROBLEM...

E.M.S. (FEMALE): HOW OLD ARE YOU?

E.M.S. (MALE): THEN YOU PROBABLY... YOU PROBABLY NEED SOME KIND OF MEDICINE... AT THIS POINT... YOU KNOW? HOW OLD ARE YOU?

SCHOOLCRAFT: <INAUDIBLE>

E.M.S. (MALE): HOW OLD ARE YOU?

SCHOOLCRAFT: thirty four...

E.M.S. (MALE): THIRTY FOUR YEARS OLD... A THIRTY FOUR YEAR OLD MAN SHOULD NOT HAVE A PRESSURE THAT HIGH... OK...

SCHOOLCRAFT: FOREST HILLS...

E.M.S. (MALE): Alright... UM... ALRIGHT JUST HANG-OUT... RELAX...

D.C. MARINO: HOW HIGH IS HIS PRESSURE?

E.M.S. (FEMALE): I DON'T KNOW... HOW HIGH IS HIS PRESSURE?

E.M.S. (MALE): ONE SIXTY OVER ONE...

SCHOOLCRAFT: CAN YOU SHARE MEDICAL INFORMATION WITH THEM

E.M.S. (MALE): I'm only telling you their blood pressure... I'm not saying who it's...

SCHOOLCRAFT: CAN YOU SHARE THAT WITH THEM?

E.M.S. (MALE): I'm not shhh... not... using your name sir...

SCHOOLCRAFT: I'M IN THE SAME ROOM... IN MY APARTMENT...

D.C. MARINO: NEVER MIND... I DON'T NEED TO KNOW...

E.M.S. (MALE): Ok... so...

SCHOOLCRAFT: THANKS FOR LOOKIN OUT FOR ME...

E.M.S. (MALE): hee...

EVERYONE, INCLUDING ME, WALKS OUT OF MY APARTMENT AND THE DOOR CLOSES AND LOCKS...
< 15 minute 39 second >

I RETURN TO MY APARTMENT, FOLLOWED BY Captain LAUTERBORN PUSHING HIS WAY IN...
< 17 minute 50 second >

SCHOOLCRAFT: <INAUDIBLE>

Capt. LAUTERBORN: YA... CAUSE YOU REFUSED A LAWFUL ORDER TO BEGIN WITH AND YOU GOTTA COME BACK AND WE'LL STRAITEN IT OUT... OR ELSE... ALRIGHT?

SCHOOLCRAFT: I... I DON'T FEEL GOOD... I'M LAYING DOWN... I HAVE HIGH BLOOD PRESSURE... STOMACH PROBLEMS... GO AHEAD GET YOURSELVES A DRINK OUT OF THE FRIDGE IF YOU WANT... <speaking to Larry Schoolcraft (father) on cell-phone> fuck... I got... I got like three Chiefs in my apartment...

Capt. LAUTERBORN: ADRIAN? LIE DOWN IN THE BUS... AND WE'LL GO...

SCHOOLCRAFT: I CAN LIE DOWN IN MY OWN BED... I HAVEN'T DONE ANYTHING WRONG...

Capt. LAUTERBORN: YA... YOU HAVE...

SCHOOLCRAFT: OK... GO... WRITE IT... FILE IT... WRITE IT UP...

Capt. LAUTERBORN: WE WILL...

SCHOOLCRAFT: WRITE IT UP...

Capt. LAUTERBORN: WE WILL...

SCHOOLCRAFT: OK...

Capt. LAUTERBORN: BUT NOW IT'S COME...

SCHOOLCRAFT: YOU DON'T NEED ME THERE...

Capt. LAUTERBORN: NOW IT'S COMING DOWN... TO... TO WELL...

SCHOOLCRAFT: WRITE... WRITE... THE SERGEANT HUFF... WRITE THAT I DISOBEYED AN ORDER FROM SERGEANT HUFFMAN... WRITE IT... WHATEVER YOU WANT...

Capt. LAUTERBORN: NOW IT'S A MATTER OF YOUR HEALTH...

D.C. MARINO: ADRIAN... ADRIAN... LISTEN TO ME... ALRIGHT SON... HIT THE LIGHT IN HERE... RIGHT NOW... EMS IS SAYING THAT YOU'RE ACTING IRRATIONAL... THIS IS THEM NOT US... AND THAT IF YOU DON'T GO TO THE HOSPITAL...

SCHOOLCRAFT: YA... THEIR (Lt. Goff and Sgt. Duncan) WHISPERING IN THEIR EAR

D.C. MARINO: ADRIAN... THEY ARE NOT...

SCHOOLCRAFT: CHIEF... DO WHAT YOU GOTTA DO...

D.C. MARINO: ADRIAN... LISTEN TO ME... THEIR GOING TO TREAT YOU...

SCHOOLCRAFT: DO WHAT YOU GOTTA DO...

D.C. MARINO: LISTEN TO ME...

SCHOOLCRAFT: IF I HAVE A HEART ATTACK AND YOU STRAP ME UP...

D.C. MARINO: SON... LISTEN TO ME... SON... THEIR GONNA TREAT YOU AS AN E.D.P... NOW YOU HAVE A CHOICE... YOU GET UP LIKE A MAN AND PUT YOUR SHOES ON AND WALK INTO THAT BUS...

SCHOOLCRAFT: LIKE A MAN?

D.C. MARINO: LIKE A MAN... OR SON THEIR GONNA TREAT YOU AS AN E.D.P. AND THAT MEANS HAND-CUFFS... AND I DO NOT WANT TO SEE THAT HAPPEN TO A COP... I DON'T WANT TO SEE THEM CUFF YOU AND BAG YOU AND EVERYTHING ELSE...

SCHOOLCRAFT: DO WHAT YOU GOTTA DO... I HOPE I DON'T HAVE A HEART ATTACK...

D.C. MARINO: SON...

SCHOOLCRAFT: WITH YOUR AH... INSPECTIONS WHISPERING IN E.M.S.'s EAR...

D.C. MARINO: THEIR NOT... LISTEN SON... THEIR NOT WHISPERING TO ANYBODY... THEIR HERE BECAUSE THEIR DOING THEIR JOB... YOU'VE CAUSED THIS...

SCHOOLCRAFT: I DIDN'T CAUSE ANYTHING...

D.C. MARINO: YOU HAVE CAUSED THIS...NOW YOU HAVE A CHOICE... YOU... THEIR SAYING YOU HAVE TO GO TO THE HOSPITAL... THAT'S E.M.S... AS A TRAINED MEDICAL PROFESSIONALS... AND IF YOU DON'T GO...

SCHOOLCRAFT: THEN... THEN WHY ARE THEY (Lt. Goff and Sgt. Duncan) TALKING TO THEM...

D.C. MARINO: AND IF YOU DON'T KNOW... AND YOU DON'T GO... THEN YOU'RE NOT ACTING RATIONALLY AND THEY SAY NOW... THEIR AFRAID YOU'RE EMOTIONALLY DISTURBED... SO YOU HAVE A CHOICE... YOU GET UP YOU PUT YOUR SHOES ON... YOUR COAT AND YOU GO TO THE HOSPITAL AND GET LOOKED AT... YOU SAID YOU DON'T FEEL GOOD...

SCHOOLCRAFT: I DON'T...

D.C. MARINO: THEY SAID YOUR BLOOD PRESSURE IS HIGH... YOU NEED TO GET CHECKED...

SCHOOLCRAFT: IT'S ALWAYS HIGH...

D.C. MARINO: YOU NEED TO GET CHECKED...

SCHOOLCRAFT: CAUSED BY YOU... CHIEF...

D.C. MARINO: YES... CAUSED ALL BY ME... YOU'VE NEVER SEEN ME BEFORE IN YOUR LIFE...

SCHOOLCRAFT: HUH...

D.C. MARINO: YOU'VE NEVER SEEN ME BEFORE IN YOUR LIFE...

SCHOOLCRAFT: I HAVE SEEN YOU

D.C. MARINO: SON... YOU GOTTA CHOICE... WHAT IS IT GONNA BE?

SCHOOLCRAFT: I'M LAYING RIGHT HERE... UNTIL I FEEL BETTER...

D.C. MARINO: OK SON... HE'S E.D.P.

? ALRIGHT

D.C. MARINO: HE'S E.D.P.

? IN CUFFS

D.C. MARINO: YA... ARE YOU GONNA GO? ARE YOU GONNA GO? I DON'T WANNA SEE THIS HAPPEN TO YOU...

SCHOOLCRAFT: I'M GONNA... I'M GONNA GO TO THE HOSPITAL...

D.C. MARINO: THEN LET'S GO...

? YOU'RE GOING NOW THOUGH...

SCHOOLCRAFT: WHEN I FEEL BETTER...

? NO... YOU DON'T HAVE A CHOICE...

? IT'S NOW...

D.C. MARINO: TRAINED MEDICAL PROFESSIONALS ARE SAYING NOW...

SCHOOLCRAFT: THEIR GONNA CUFF ME...

D.C. MARINO: NO... I DON'T EVEN KNOW WHO THAT IS...

SCHOOLCRAFT: NO... NO I'M... NO... I'M A PERP... HE'S NOT TALKING TO YOU...

D.C. MARINO: NO... YOUR EMOTIONALLY DISTURBED... YOU'RE MAKING THIS CHOICE ON YOUR OWN ADRIAN... YOU CAN GET UP AND WALK OUT OF HERE...

SCHOOLCRAFT: I AM... I'M LAYING HERE...

D.C. MARINO: NO...

SCHOOLCRAFT: I'M LAYING HERE CHIEF...

D.C. MARINO: THEY SAY YOU HAVE TO GO... NOW WERE OBLIGATED TO BRING YOU...

SCHOOLCRAFT: I'M LAYING HERE CHIEF...

D.C. MARINO: FOR YOUR OWN SAFETY...

SCHOOLCRAFT: MY BACK HURTS...

D.C. MARINO: OK... LET'S TAKE HIM...

SCHOOLCRAFT: MY STOMACH HURTS...

D.C. MARINO: ADRIAN GET UP...

SCHOOLCRAFT: MY BLOOD PRESSURE...

D.C. MARINO: I CAN'T PLAY THIS GAME ADRIAN...

? E.S.U. ? <INAUDIBLE> STAND UP OFFICER...

SCHOOLCRAFT: I CAN'T STAND UP...

NO... PLEASE... PLEASE STAND UP...

SCHOOLCRAFT: I DON'T FEEL GOOD.

ALRIGHT... PUT YOUR HANDS BEHIND YOUR BACK...

SCHOOLCRAFT: WHY AM I PUTTING MY HANDS BEHIND MY BACK?

BECAUSE YOU HAVE TO GO TO THE HOSPITAL... YA HAVE TO...

SCHOOLCRAFT: SO YOUR GONNA PUT HAND-CUFFS ON ME BECAUSE I HAVE TO GO TO THE HOSPITAL?

D.C. MARINO: I'M GIVING YOU... GIVING YOU YOUR CHOICE... ADRIAN... GET UP AND WALK OUT...

D.C. MARINO: ADRIAN GET UP AND WALK OUT OR WERE OR WERE GONNA HAVE TO TREAT YOU AS AN E.D.P.

? <INAUDIBLE> relax...

SCHOOLCRAFT: HOW AM I BEING IRRATIONAL?

D.C. MARINO: AND YOU KNOW WHAT THAT MEANS... ALRIGHT JUST TAKE HIM... I... I CAN'T FUCKING STAND HIM ANYMORE...

<PHYSICAL ASSAULT BEGINS>

Lt. Goff (?spelling?): ALRIGHT... DO ME A FAVOR... PUT YOUR HANDS BEHIND YOUR BACK...

SCHOOLCRAFT: oooh... <PAIN CAUSED BY STRIKE TO CHEST WITH A GRAB, BY MULTIPLE ASSAILANTS, AND THEN PULLED OFF OF MY BED AND SLAMMED TO THE FLOOR>

Lt. Goff (?spelling?): PUT YOUR HANDS BEHIND YOUR BACK...

SCHOOLCRAFT: oooh... <PAIN>

Lt. Goff (?spelling?): GET ONE HAND... GO AHEAD... GET ONE HAND... GET ONE HAND... GET ONE HAND...

? I GOT IT... I GOT IT... GIVE ME ?----? CUFFS
< 22 minute >

SCHOOLCRAFT: uuuh... <PAIN>

Sgt. DUNCAN: GIVE ME YOUR OTHER HAND...

D.C. MARINO: THEY GOT HIM...

? GET OFF ONE MINUTE...

Sgt. DUNCAN: GIVE ME YOUR OTHER HAND...

D.C. MARINO: ADRIAN...

Sgt. DUNCAN: GIVE ME YOUR OTHER HAND...

D.C. MARINO: ADRIAN... STOP THIS ADRIAN...

Sgt. DUNCAN: GIVE ME YOUR OTHER HAND... GIVE HIM THE OTHER HAND...

? I GOT...

SCHOOLCRAFT: oh my chest...

D.C. MARINO: ADRIAN... STOP IT ADRIAN...

SCHOOLCRAFT: my chest... oh my chest... oooh my che...

D.C. MARINO: ALRIGHT LETS GET HIM OUT... CALL THE BUS UP... LET'S GET A CHAIR... GET HIM TO THE HOSPITAL FORTHWITH... HES COMPLAING OF CHEST PAINS LETS GET HIM TO THE HOSPITAL... WE'LL GET YOU TO THE HOSPITAL RIGHT AWAY ADRIAN... YOU DIDN'T HAVE TO DO THIS... I DON'T KNOW WHAT... WHAT YOUR AGENDA IS... OR WHY YOU'RE DOING THIS... THERE'S NO NEED FOR THIS...

SCHOOLCRAFT: you're too good to me boss...

D.C. MARINO: YA... WELL...

SCHOOLCRAFT: why you so good to me...

D.C. MARINO: AS GOOD AS YOU DESERVE SON...

D.C. MARINO: ABSOLUTLEY AMAZING ADRIAN YOU PUT YOUR FELLOW POLICE OFFICERS THROUGH THIS... ABSOLUTLEY AMAZING...

Sgt. DUNCAN: < 23minute 51 second > YOU WANNA HOLD ON TO THIS?

D.C. MARINO: YA... IT'S A RECORDER...

Sgt. DUNCAN: YA... HE'S REACHING DOWN INTO HIS WAIST...

SCHOOLCRAFT: I'M NOT REACHING DOWN MY WAIST... MY PAN... YOU'RE PULLING MY PANTS DOWN...

Sgt. DUNCAN: WHY YA PUTTIN YOUR HANDS IN YOUR PANTS...

SCHOOLCRAFT: CAUSE... YOU'RE PULLING MY PANTS DOWN... I

Sgt. DUNCAN: IT'S NOT DOWN...

SCHOOLCRAFT: IT'S A NATURAL REACTION TO A MAN PULLING MY PANTS DOWN...

? ummm... <INAUDIBLE>

D.C. MARINO: ya...

Sgt. DUNCAN: let's take his I.D.?

D.C. MARINO: DOES HE HAVE AN I.D. CARD?

Sgt. DUNCAN: HE ALREADY TOOK HIS I.D. CARD...

<INAUDIBLE COMMENT ABOUT DRIVER'S LICENSE BY Sgt. DUNCAN> < 24 minute 37 second >

D.C. MARINO: COUNT HIS MONEY RIGHT NOW...

Sgt. DUNCAN: <INAUDIBLE> take it with him...

D.C. MARINO: COUNT HIS MONEY IN FRONT OF ME... I DON'T WANNA TURN AROUND SAYING HE STOLE HIS MONEY... WEARING RECORDING DEVICES AND EVERYTHING ELSE SO HE'S PLAYING A GAME HERE... CUTE... WHEN I CAME ON THE JOB A COP WOULD NEVER DREAM OF DOING THAT TO ANOTHER COP... NOT FOR ALL THE MONEY IN THE WORLD... THINGS CHANGE...

<Sgt. DUNCAN AND D.C. MARINO COUNTING U.S. CURRENCY> <FROM WALLET>

D.C. MARINO: FOUR HUNDRED AND FIFTY DOLLARS... THAT'S WHAT YOU HAVE ADRIAN... FOUR HUNDRED AND FIFTY DOLLARS... I DON'T KNOW IF YOU WANT TO BRING THAT TO THE HOSPITAL OR NOT ADRIAN... IF YOU WANT TO LEAVE THAT HERE... YOU TELL ME WHAT YOU WANT TO DO WITH THAT... THAT'S A LOT OF MONEY... I DON'T KNOW IF THEIR GONNA KEEP YOU OR NOT... WHAT DO YOU WANT TO DO?

SCHOOLCRAFT: keep it...

D.C. MARINO: KEEP IT... YOU GOT IT... IT'S YOURS... MAKE A CHOICE...

? <INAUDIBLE COMMENT ABOUT A VOUCHER>

D.C. MARINO: YOU KNOW WHAT... IF THEY... IF THEY'RE GOING TO ADMIT HIM... YA... THAT'S GOTTA BE VOUCHERED...

Sgt. DUNCAN: YES...

D.C. MARINO: JUST SO THAT THEY DON'T TAKE IT FROM HIM IN THE HOSPITAL... SOMEBODY LIFT IT ON HIM... ALRIGHT... WE'LL PROTECT IT...

? ADRIAN ARE YOU GONNA COOPERATE AND STAND-UP...

SCHOOLCRAFT: I WASN'T... I NEVER DIDN'T COOPERATE WITH YOU...

? OF COURSE YOU DID... WHEN I ASKED YOU TO TURN AROUND BEFORE... PUTS YOUR HANDS BEHIND YOUR BACK...

SCHOOLCRAFT: what's my charge?

? you walkin out to... <INAUDIBLE COMMENT>

? STAND UP...

SCHOOLCRAFT: oooh... aaah... <PAIN>

? STAND UP...

SCHOOLCRAFT: my legs hurting...

? OK... STAND UP...

SCHOOLCRAFT: my legs hurt...

? STAND UP...

E.S.U. ADAM-TEN: < 26 minute 38 second > ALRIGHT... HES NOT GONNA STAND- UP... ADAM-TEN
CENTRAL... CENTRAL CANCEL EVERYBODY...

Deputy Chief Marino <(26 minute 50 second)> I told hostage forget it... <(INAUDIBLE)>... He's not going to
make another phone call...

E.S.U. ADAM-TEN: COME ON MAN LIFT UP YOUR FEET... LIFT-UP...

Sgt. DUNCAN: He's not going to... He's not going to...

<INAUDIBLE COMMENTS>

SCHOOLCRAFT: I CAN'T...

CENTRAL (Radio): <(27 minute 22 second)> Adam Three...

Deputy Chief Marino (RADIO): Advise the officer(s) <INAUDIBLE> He's off the Building... He's off the roof... He ran
down the stairs... we're gonna be 84 momentarily... <INAUDIBLE>...

E.S.U. ADAM-TEN (?): YOU PUT YOUR SNEAKERS ON YOUR FEET... HUH... ADRIAN... SNEAKERS ON
YOUR FEET... OR YOU GONNA GO LIKE THAT?

Capt. LAUTERBORN: CAPTAIN LAUTERBORN... HOW ARE YA... UH... UHUH... THE UPDATE IS WE
HAVE THE OFFICER... HES GONNA... GO TO THE HOSPITAL... I DON'T KNOW
WHICH ONE YET... BUT UHHH... HES FINE... HES JUST GONNA GO TO BE
EVALUATED... ALRIGHT... OK...

WHOS KEYS ARE THOSE? < 28 minute 27 second >

THESE ARE HIS KEYS...

LOCK THE DOOR AND GIVE THAT TO THE LANDLORD?

HIS KEYS?

ITS HIS KEYS...

THE LONDLORDS?

THE LANDLORD HAS HIS KEYS BACK...

I'LL TAKE THEM...

APARTMENT DOOR CLOSES SHUT

< 28 minute 42 second >

HOME INVASION HALLOWEEN NIGHT (Transcribed)

Digital Voice Recorder: Olympus DS-50

OCTOBER 31, 2009