PLAINTIFF'S MOTION
EXHIBIT 18

1   T. Caughey

2   your possession?

3   MR. SHAFFER: Objection.

4   A.   When I retired, I never went to the

5   property clerk to get my guns.

6   Q.   Why not?

7   MR. SHAFFER: Objection.

8   A.   No reason.

9   Q.   Do you carry a gun today at all?

10   MR. SHAFFER: Objection.

11   A.   No.

12   Q.   Do you have a good guy letter?

13   MR. SHAFFER: Objection.

14   A.   Yes.

15   Q.   Do you remember encountering

16   Officer Schoolcraft on October 31, 2009?

17   A.   Yes.

18   Q.   What do you recall about that?

19   A.   I recall Officer Schoolcraft was

20   sitting at the telephone switchboard.   I was

21   walking by with a couple of command logs

22   which are 20 inches tall by 11 inches wide.

23   They are very heavy.   I had a few of them

24   along with a couple of other logs.   I saw

25   Officer Schoolcraft making an entry in his

1   T. Caughey

2   memo book. I said, Is it up to date? I put

3   it on top. I will sign it. I put into the

4   top of the things I was signing. I went into

5   the office or administrator room with it.

6   Q.   How long did you keep it, his memo

7   book?

8   A.   I don't know.

9   Q.   What did yo do with the memo book?

10   A.   I had it in my office. And after I

11   finished my administrator, the paperwork I

12   was doing, I then opened his book and

13   signed -- I believe I signed it.

14   Q.   And what did you do next?

15   A.   Then made copies of his memo book.

16   Q.   Of the whole book or just

17   particular pages?

18   A.   I believe I made copy of the whole

19   book.

20   Q.   How many pages was that?

21   MR. SHAFFER: Objection.

22   A.   I don't know how many pages it is.

23   Q.   More than ten?

24   A.   More than ten.

25   Q.   Would you take a look at what has

1   T. Caughey

2   been marked as Exhibit 45, first page of

3   which appears to be a cover page for Officer

4   Schoolcraft's memo book dated August 11,

5   2009.

6   Can you tell me after looking at

7   this exhibit whether or not these were the

8   pages that you photocopied on October 31st?

9   A.   I cannot say these are the pages

10   that I copied that day.

11   Q.   Why did you photocopy pages or the

12   whole memo book?

13   A.   As I was signing Schoolcraft's memo

14   book I noticed on one of the back pages,

15   which was referred to earlier as a fly page,

16   what I thought to be an unusual entry.

17   Q.   What was the unusual entry?

18   A.   If I recall correctly, it was an

19   entry about a Sergeant Gallina and a Sergeant

20   Sawyer having an argument at roll call.

21   Q.   And as a result of seeing that

22   entry, you decided to make a photocopy of the

23   entire memo book?

24   A.   There was another entry in there,

25   but I don't recall what it was about. But,

1   T. Caughey
2   Schoolcraft's memo book?
3   A.   No.
4   Q.   8641 there are references to a
5   meeting between Schoolcraft and Lieutenant
6   Brill.
7   Were you aware of those references
8   in Officer Schoolcraft's memo book when you
9   made a photocopy?
10   A.   I was not.
11   Q.   As of October 31,2009 were you
12   aware that Officer Schoolcraft was discussing
13   any matters with Lieutenant Brill?
14   MR. SHAFFER: Objection.
15   A.   No.
16   Q.   As of October 31st, at the time you
17   took Officer Schoolcraft's memo book did you
18   know that Officer Schoolcraft had contacted
19   IAB?
20   A.   No.
21   Q.   As of October 31st, did you know
22   that Officer Schoolcraft contacted QAD?
23   A.   No.
24   Q.   Why did you make the photocopy of
25   Officer Schoolcraft's memo book?

1   T. Caughey

2   MR. SHAFFER: Objection.

3   A.   For the unusual entry that he made

4 in it.

5   Q.   What did you do with that

6 photocopy?

7   A.   I placed a copy -- I made two

8 copies of the memo book. I believe I put one

9 in my office and I put another copy into the

10 inspector's office.

11   Q.   When you say you put another copy

12 in the inspector's office, what do you mean?

13   A.   I went into his office with the

14 copies in a manila envelope. I put it in his

15 drawer of his desk.

16   Q.   Did you write a note in the manila

17 envelope or on the manila envelope?

18   A.   No.

19   Q.   Did Mauriello know you were making

20 copies of the memo book at the time you were

21 making them?

22   A.   No.

23   Q.   Did you tell Inspector Mauriello

24 after making the copies that you made copies

25 and put a copy in his desk drawer?