

SM Exhibit AC

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ADRIAN SCHOOLCRAFT,

Plaintiff,

Case No:

- against -

10 CV 06005

THE CITY OF NEW YORK, ET AL.,

Defendants.  
-----X

111 Broadway  
New York, New York

April 11, 2014

10:21 a.m.

CONFIDENTIAL EXCERPT

DEPOSITION OF WILLIAM GOUGH, pursuant to  
Notice, taken at the above place, date and  
time, before DENISE ZIVKU, a Notary Public  
within and for the State of New York.

1 CONFIDENTIAL - WILLIAM GOUGH

2 recorder.

3 Q. Did you interact with anybody at  
4 the 90th Precinct when you got there?

5 A. I'm not sure.

6 Q. What did you do next?

7 MS. PUBLICKER METHAM:

8 Objection. You could answer.

9 A. I put on my firearm and my  
10 shield.

11 Q. Then what did you do?

12 A. Got in the department auto and  
13 proceeded to the 81st Precinct.

14 Q. Did you go by yourself?

15 A. Not sure.

16 Q. What kind of vehicle did you  
17 drive to the 81st --

18 A. I believe it was a Hyundai.

19 Q. What did you do when you got to  
20 the 81st Precinct?

21 A. Spoke with Captain Lauterborn.

22 Q. Had you previously met Captain  
23 Lauterborn?

24 A. Yes.

25 Q. How well did you know him at the

1                   CONFIDENTIAL - WILLIAM GOUGH

2                   Q.           Did Lauterborn say anything  
3 else?

4                   MS. PUBLICKER METHAM:

5                   Objection.   You could answer.

6                   A.           I don't -- I don't specifically  
7 recall.

8                   Q.           Can you explain to me why you're  
9 saying that Schoolcraft was still in the  
10 apartment or it was a belief that he was  
11 still in the apartment would be a response  
12 to Chief Marino's question about why  
13 operations hadn't been notified previously?

14                   MS. PUBLICKER METHAM:

15                   Objection.

16                   A.           When you're unsure or uncertain  
17 of a location of a member of the service and  
18 they're unaccounted for, you start -- it's a  
19 fairly exhaustive search, operations,  
20 communications.   Basically, for lack of a  
21 better term, from the understanding of most  
22 people, it's like an all points bulletin.  
23 Every, you know, nook and cranny is  
24 overturned.   At that point Captain  
25 Lauterborn, along with myself, we didn't

1 CONFIDENTIAL - WILLIAM GOUGH

2 feel that -- we weren't certain that he  
3 wasn't in his residence and this was just --  
4 the preliminary step is to always check the  
5 residence first. By checking the residence  
6 first, I've heard of AWOL searches where a  
7 police officer doesn't come to work and they  
8 wind up taking that police officer's door  
9 because they're uncertain as to whether  
10 they're home or not because prior to this  
11 widely exhaustive search a complete and  
12 thorough search of a residence will be  
13 conducted, along with the canvass of  
14 neighbors and contacts of members of the  
15 family.

16 Q. So is it your understanding that  
17 when a member of service goes AWOL,  
18 operations is notified only after this  
19 initial search --

20 A. Residence check.

21 Q. -- residence check is conducted;  
22 is that correct?

23 MS. PUBLICKER METTHAM:

24 Objection. You could answer.

25 A. Yes.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

ADRIAN SCHOOLCRAFT,  
Plaintiff,

Case No:  
10 CV 06005

- against -

THE CITY OF NEW YORK, ET AL.,

Defendants.

-----X

111 Broadway  
New York, New York

April 11, 2014  
10:21 a.m.

DEPOSITION OF WILLIAM GOUGH, pursuant to  
Notice, taken at the above place, date and  
time, before DENISE ZIVKU, a Notary Public  
within and for the State of New York.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

WILLIAM GOUGH

Q. Who -- describe how that happened?

MS. PUBLICKER METHAM:

Objection. You could answer.

A. ESU came down the stairs and they said he's up there, meaning Officer Schoolcraft. I proceeded into the apartment with Sergeant Duncan.

Q. Was any EMS in the apartment when you got there?

A. Yes.

Q. Who else was in the apartment?

A. Captain Lauterborn.

Q. Anybody else?

A. Chief Marino.

Q. Anybody else?

A. Inspector Mauriello.

Q. Anybody else?

A. Those are the three that I specifically remember.

Q. So when the two ESU officers came down the stairs and they told you he's up there, right?

A. Yes.