

1 the report and approved it, where did you get the
2 underlying information to be able to enter the report
3 for Det. Gregory?

4 A His -- I don't know if it's a file or a folder.
5 He sent me a -- I don't know if he sent me a file or a
6 folder, but I had the reports that he had in Word. I
7 mean, at different times reports are entered into
8 Varuna. Our command structure wants the reports put in
9 Word.

10 Q Oh, you said command staff wants the reports
11 put in Word?

12 A Sometimes, yes.

13 Q And how did you obtain that information, that
14 the command staff wanted reports put in Word before
15 being put in Varuna?

16 A They will tell you. They will tell you, "Do
17 not enter this in Varuna."

18 Q Did they tell you why?

19 A No.

20 Q Is this a directive -- the directive from
21 command staff to not enter your reports in Varuna, is
22 this a written directive?

23 A I don't think I have ever gotten one that said
24 it was written.

25 Q Do you recall who in the demand staff told you

1 not to enter -- strike that.

2 Do you know if anyone in the command structure
3 instructed you or your subordinates to enter the reports
4 related to the Holtzclaw investigation into Word first?

5 A On any officer-involved case, every time you
6 had one you are told, "Make sure you don't put it in
7 Varuna."

8 Q Okay.

9 A So I'm gonna assume I was told, but there
10 wasn't any reason to tell me, because I knew they were
11 going to be in Word and not entered in Varuna.

12 Q Do you know why on every officer-involved case
13 the command staff instructs their subordinates to not
14 put the reports in Varuna?

15 A Specifically, no. I know they review -- I know
16 they want to review the reports.

17 Q But couldn't they review the reports in Varuna?

18 A Yeah.

19 (Plaintiff's Exhibit 6 was marked for
20 identification and made a part of the
21 record.)

22 Q Lieutenant, have you seen this document before?

23 A Yes.

24 Q Can you identify it for the record?

25 A It's the -- I'm going to tell you it's the