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1 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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4 RAYMING CHANG, et al., :

5 Plaintiffs, : Civil Action

6 v. : No. 02-2010(EGS)

7 UNITED STATES OF AMERICA, et al., :

8 Defendants. :

9 ----- x

10 Washington, D.C.

11 Wednesday, November 17, 2004

12 Continued Deposition of:

13 JEFFREY HEROLD,

14 called for examination by counsel for the Plaintiff, at
15 the Offices of Bryan Cave, 700 Thirteenth Street, N.W.,
16 Suite 700, Washington, D.C., before Barbara A. Huber,
17 court reporter and notary public in and for the
18 District of Columbia, commencing at 9:05 a.m., when
19 were present on behalf of the respective parties:

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00249

1 were locked in would have been dubbed "sleeping
2 dragons" blocked 14th Street. I'm not sure which
3 day that occurred. However, I know that occurred
4 during these meetings.

5 Q Okay. I'm going to turn to the arrests
6 made.

7 When you were observing the passageway,
8 I think is how we were referring to it, the
9 corridor between -- you know, from the Park Police
10 to the bus, did you witness people cuffed?

11 A People were handcuffed as they -- before
12 they got on the bus. At the point where they were
13 handcuffed, I'm not quite sure.

14 Q Did you see how people were handcuffed
15 at all while you were witnessing the arrests?

16 Did you see exactly how they were
17 restrained?

18 A They were put into what's known as a
19 double flex cuff, handcuffed behind their back,
20 for the most part.

21 Q Have you ever handcuffed a prisoner from
22 wrist to ankle in your career?

00250

1 A No. I have not.

2 Q Have you witnessed people handcuffed
3 wrist to ankle in your career?

4 A I have never seen anybody handcuffed in
5 that manner.

6 Q Were you trained at any point to
7 handcuff people wrist to ankle?

8 A No. I have not ever been trained to do
9 that.

10 Q Are you aware that people were
11 handcuffed wrist to ankle after their arrest in
12 Pershing Park?

13 MR. KOGER: Foundation.

14 BY MR. TURLEY:

15 Q You can answer.

16 A I know that that has occurred in
17 processing centers. If it was specific to
18 Pershing Park, I don't remember.

19 Q Are you aware of any early -- any --
20 before 2002, are you aware of any incidents where
21 there were allegations of wrist to ankle
22 restraints used by the MPD?