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THE ALLIANCE FOR GLOBAL JUSTICE :  
Plaintiff :  
v. :  
THE DISTRICT OF COLUMBIA :  
Defendant :  
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DEPOSITION OF CAPT. JEFFREY HEROLD  
Washington, D.C.

Tuesday, December 14, 2004

Deposition of CAPT. JEFFREY HEROLD, called  
for examination at 10:13 a.m., at the law offices of  
the Partnership For Civil Justice, Inc., 1901  
Pennsylvania Avenue, N.W., Washington, D.C., before  
Gary S. Howard, a notary public in and for the  
District of Columbia, when were present on behalf of  
the respective parties:

1 describes it right.

2 No, there is none other than what you just  
3 mentioned.

4 Q Okay. So when it was related to you, when  
5 you first heard about it, it was described in terms  
6 of multiple flexcuffs, wrist to ankle?

7 A Wrist to leg.

8 Q Wrist to leg? Is the use of flexcuffs,  
9 wrist to ankle, authorized within MPD policy?

10 A There's no policy one way or the other in  
11 regard to that type of restraint.

12 Q When the use of that restraint first came  
13 to your attention -- and I understand that that was  
14 through second-hand sources.

15 A Yes, it was.

16 Q Who brought it to your attention?

17 A I don't remember.

18 Q Have you ever had a discussion about the  
19 wrist-to-ankle manner of restraint with persons that  
20 have policy-making responsibility for the MPD?

21 A Yes.

22 Q On what occasions?

1 of that type of restraint.

2 Q What, if anything, did Jose Acosta say  
3 about this use of restraint?

4 A I don't have specific recollection of what  
5 Chief Acosta was saying.

6 I don't recall.

7 Q What did Alfred Broadbent communicate  
8 regarding this use of restraint?

9 A Specifically, I don't recall. But the  
10 conversations surrounded what I previously stated.

11 Q And it's fair to say that in the course of  
12 these communications, there was general approval of  
13 the use of this manner of restraint.

14 Is that --

15 A That was my understanding.

16 Q Do you have reason to know whether Chief  
17 Ramsey has knowledge of this use of restraint?

18 A I don't know what the Chief knows or not.

19 Q Have you ever seen documents that refer to  
20 this use of restraint that were copied or directed  
21 also to the chief?

22 A No, I have not.

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