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

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3 :
RAYMING CHANG, et al., :

4 :
Plaintiffs, :

5 :
v. :CA No. 02-2010(EGS)

6 UNITED STATES OF AMERICA, et al.:

7 :
Defendants. : (Volume I)

8 ----- x

9 Washington, DC

10 Wednesday, September 8, 2004

11 Deposition of COMMANDER CATHERINE LANIER, Witness,

12 called for examination by counsel for the Plaintiff, at the

13 Office of Bryan Cave, 700 Thirteenth Street, Northwest

14 Suite 700, Washington, DC, before Diana L. Cox, CCR, a

15 stenographic reporter and notary public in and for the

16 District of Columbia, commencing at 9:38 a.m., when were

17 present on behalf of the respective parties:

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1 Exhibit Number 2. Where the city was, based on activities,
2 was cordoned up into areas where assistant chiefs and
3 commanders were given areas that they were responsible for.

4 In that particular instance, the APEC conference, I
5 was responsible for the site where the largest number of
6 protestors were expected. At the site where the conference
7 was being held itself. Where we had helmets on for
8 protestors and counter protestors and anticipated conflict
9 between the two.

10 Q Okay. In the April 2000 IMF, during the April
11 IMF demonstration, in which you were the commander of
12 prisoner control, were there prisoners at the police
13 academy at that time?

14 A Yes.

15 Q And, do you recall how many prisoners there were?

16 A Over the course of, I believe, three days, there
17 was somewhere in the neighborhood of 1150 prisoners
18 arrested, that came through the processing center.

19 Q How were they restrained when they were at the
20 academy?

21 A Left wrist to right ankle, seated on a mat on the
22 floor of the gymnasium.

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1 Q How was that policy, that is to restrain left
2 wrist to right ankle, how was that policy developed, do you
3 know?

4 A I can tell you my knowledge of how it came about.

5 Q Please.

6 A Assistant Chief Acosta, who at the time was a
7 commander, my boss, in special services, had traveled
8 around, had spent most of his career in SOD and had
9 travelled around the country observing different
10 demonstrations around the country. I don't know that he
11 observed that somewhere else and brought it back.

12 But in a meeting, when we were planning IMF 2000, when
13 we were trying to make a determination as to how we would
14 house prisoners if we had large numbers in open areas. How
15 would we do that to ensure we didn't have problems that
16 occurred back in the May Day demonstrations. Where large
17 numbers of prisoners were put into an open, I believe the
18 armory, an open area where prisoners were assaulting each
19 other and, basically left unrestrained. And had all sorts
20 of problems.

21 So in a meeting, a staff meeting in commander Acosta's
22 office, he brought up the idea. We actually brought flex

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1 conversations with them?

2 A I know I went back to their mat to talk to them
3 several times and, just trying to reassure them that I was
4 doing everything I could to get them out of there as
5 quickly as possible, and I apologized for the delay, same
6 thing I said to a lot of people, just general trying to be
7 pleasant.

8 Q I think you described them as pleasant?

9 A Yes.

10 Q Did you have any problems with them?

11 A No, none at all.

12 Q They were cooperative?

13 A Yes.

14 Q Non-violent?

15 A Yeah.

16 Q Why don't you turn to the second page, the
17 photograph of the young man in glasses here? I represent
18 to you that his name is Adam Eidinger. Have you ever seen
19 him before?

20 A I've seen him lots of times.

21 Q Where have you seen him?

22 A I've seen him on many, many, many demonstrations