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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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ALLIANCE FOR GLOBAL :  
 JUSTICE, : No. 01 CV 00811  
 Plaintiff, :  
 vs. :  
 DISTRICT OF COLUMBIA, :  
 Defendant. :

-----x

DEPOSITION OF ALFRED J. BROADBENT

Washington, DC  
Tuesday, May 17, 2005

REPORTED BY:  
MEGAN HASSEL

1 physical problem, then the police officer and/or  
2 official should have taken whatever appropriate  
3 action to relieve that individual of any pain.  
4 We're not into pain compliance. That's not what the  
5 purpose of that was.

6 The purpose of it was to keep an  
7 individual under control so they wouldn't get hurt  
8 by other prisoners, they wouldn't get hurt by a  
9 police officer, or they wouldn't hurt themselves.  
10 It was a safety precaution and nothing else.

11 Q Were there any discussions after the use  
12 of this manner of restraint that were critical  
13 within the MPD of this manner of restraint?

14 A I believe there was discussions around how  
15 could you improve upon that method. Knowing there  
16 were, again, still no facilities, if you went  
17 through mass arrests that would hold the number of  
18 prisoners that are usually in the situation of mass  
19 arrests.

20 Q Were changes made -- strike that.

21 This manner of restraint was applied in a  
22 subsequent mass arrest demonstration situation, was

1 it not?

2 A I don't know. I'd have to research that.

3 Q Were any changes to the protocol for this  
4 manner of restraint made, to your knowledge?

5 A I'd have to research that. I don't  
6 remember.

7 Q Was there, in fact, a protocol? And by  
8 that I mean, were there, in fact, guidelines about  
9 this manner of restraint?

10 A I don't remember.

11 Q In the MPD training, is there training on  
12 how to properly apply this manner of restraint?

13 A This is not a normal manner of restraint  
14 in handcuffing.

15 Q And was there training on how to apply  
16 this manner of restraint?

17 A I don't know.

18 Q You've never been trained in a formal  
19 setting on how to apply this manner of restraint?

20 A I have not, no. But it's been a long time  
21 since I arrested someone, so it could have been  
22 given to officers who would be in that arrest