

1 not sending an on-call investigator to the scene when
2 Ms. Morris initially reported her sexual assault?

3 A It was -- if I recall correctly he was
4 counseled, which is not discipline, but it is
5 corrective.

6 Q And who counseled him?

7 A I did along with Capt. Bacy.

8 Q And when did you counsel Lt. Ramos?

9 A If I remember correctly, it was on either that
10 Tuesday after we came back, because I was concerned that
11 he hadn't responded and I wanted to make sure that we
12 corrected that in the future to make sure that he did
13 respond whenever he was receiving a callout like that.

14 Q And did you document that you had counseled
15 Lt. Ramos about violating the callout procedure?

16 A I did not. That would have been Capt. Bacy's
17 responsibility.

18 Q Do you know if Capt. Bacy documented that he
19 counseled Lt. Ramos regarding the callout procedure?

20 A I don't know for sure. I can't answer that.

21 Q What specifically did you recall -- do you
22 recall that you told Lt. Ramos after he violated the
23 callout procedure?

24 MR. SMITH: Object to the form. You can
25 answer.

1 A I can't tell you specifically what I told him
2 other than reminding him that the callout procedures are
3 very clear and that he should have contacted -- he
4 should have responded, for one, along with his
5 detectives, and he should have notified his captain.

6 Q (By Mr. Solomon-Simmons) And what did he say to
7 you when you gave him this verbal counseling?

8 A He said she was a crack head and he didn't find
9 any validity to it.

10 Q Crack heads don't matter, huh?

11 A Well --

12 MR. SMITH: Object to the comment.

13 MS. GOOCH: Object to the form.

14 MR. SMITH: Is that a question? Is that
15 a question?

16 MR. SOLOMON-SIMMONS: I'm asking. I said
17 "huh." That's a question.

18 MR. SMITH: Oh, okay. That's how you ask
19 questions? Go ahead and answer.

20 A They do to me, obviously, because on the 27th I
21 immediately made sure that the case was assigned and
22 Det. Gregory was told to go find her.

23 Q (By Mr. Solomon-Simmons) Did you report up your
24 line of command that Lt. Ramos refused to provide a
25 detective to Ms. Morris because she was a crack head?

1 Did you tell Deputy Chief Kuhlman that?

2 MR. SMITH: Object to the multiple
3 questions. You can answer either one of them, but tell
4 us which one you're answering.

5 Q (By Mr. Solomon-Simmons) I will clarify it for
6 you.

7 A Okay.

8 Q Did you tell Deputy Chief Kuhlman that
9 Lt. Ramos breached the procedure to send out an on-call
10 investigator because Ms. Morris was a crack head?

11 MR. SMITH: Object to the form.

12 MS. GOOCH: Same objection.

13 A I told Chief Kuhlman that Miguel did not send
14 investigators, that he had said she was a crack head and
15 that was why he did not respond. I did inform him why.
16 So, yes, I'm sure that I did.

17 Q (By Mr. Solomon-Simmons) And what did Chief
18 Kuhlman, what was his response to that?

19 A He was very disappointed that Miguel didn't
20 send anyone. I counseled Miguel for his failure to do
21 so and made sure that we took corrective action to make
22 sure it didn't happen again.

23 Q What corrective action did you take to make
24 sure it didn't happen again?

25 A I told you I counseled him, which is

1 corrective.

2 Q All right. Do you know if Chief Citty was
3 informed that Lt. Ramos refused to follow the procedure
4 regarding Ms. Morris because she was a crack head?

5 MR. SMITH: Object to the form.

6 MS. GOOCH: Same objection.

7 A I don't know what Chief Citty was told. I
8 informed my deputy chief.

9 Q (By Mr. Solomon-Simmons) Did you inform
10 Capt. Bacy that Lt. Ramos did not follow the callout
11 procedure because Ms. Morris was a crack head?

12 A Capt. Bacy --

13 MS. GOOCH: Object to the form.

14 MR. SMITH: Go ahead.

15 A Capt. Bacy was there when Miguel told us both
16 that.

17 Q (By Mr. Solomon-Simmons) Oh, this was an
18 in-person conversation?

19 A Yes.

20 Q What did Capt. Bacy have to say about hearing
21 that comment from Lt. Ramos?

22 A We were both very disappointed.

23 Q Did he say -- did Capt. Bacy say anything
24 specifically to Lt. Ramos --

25 MR. SMITH: Object to the form.