

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

JAMES P. CHASSE, JR.; JAMES P. )  
CHASSE; LINDA GERBER; and MARK )  
CHASSE, individually and in his )  
capacity as Personal Representative )  
of the ESTATE OF JAMES P. CHASSE, )  
JR., )

Plaintiffs, )

v. )

CHRISTOPHER HUMPHREYS; KYLE NICE; )  
CITY OF PORTLAND; CITY OF PORTLAND )  
JOHN DOE FIREFIGHTERS/PARAMEDICS; )  
PORTLAND POLICE BUREAU and OTHER )  
PORTLAND JOHN and JANE DOE )  
OFFICIALS; BRET BURTON; MULTNOMAH )  
COUNTY; MULTNOMAH COUNTY JOHN and )  
JANE DOE DEPUTY SHERIFFS and MEDICAL )  
PERSONNEL; MULTNOMAH COUNTY JOHN and )  
JANE DOE SHERIFF'S OFFICE and OTHER )  
OFFICIALS; TRI-COUNTY METROPOLITAN )

TRANSPORTATION DISTRICT OF OREGON; )  
and AMERICAN MEDICAL RESPONSE )  
NORTHWEST, INC., )

Defendants. )

COPY

) No. CV-07-0189-HU

DEPOSITION OF

HOMER G. WILLIAMS

Taken in behalf of Defendants

\* \* \*

July 31, 2008

1211 S.W. Fifth, Suite 1900

Portland, Oregon

Shannon K. Krska, CSR

Court Reporter



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APPEARANCES:

For the Plaintiffs: MR. THOMAS M. STEENSON  
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For the Defendants MESSRS. JAMES RICE and  
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City of Portland: Attorneys at Law  
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For the Defendants MS. SUSAN DUNAWAY  
Burton and Multnomah Attorney at Law  
County: 501 S.E. Hawthorne, Suite 502  
Portland, OR 97214

For the Defendant MS. AMANDA GAMBLIN  
AMR: Attorney at Law  
1211 S.W. Fifth, Suite 1900  
Portland, OR 97204

Also Present: Steven Kraemer

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EXHIBITS

No. 307 Diagram

1 PORTLAND, OREGON; THURSDAY, JULY 31, 2008

2 12:58 PM

3 \* \* \*

4 HOMER G. WILLIAMS

5 called as a witness in behalf of the Defendants,

6 having first been sworn by the Reporter,

7 testifies as follows:

8 EXAMINATION

9 BY MR. RICE:

10 Q. Mr. Williams, my name is Jim Rice. We  
11 introduced ourselves just briefly before we started  
12 here today.

13 This is the time and the place for taking  
14 your deposition. You understand that?

15 A. (Nods head.)

16 Q. I'm going to ask you to answer out loud to  
17 help our court reporter.

18 A. (Nods head.)

19 Q. I understand when you nod your head --

20 A. Sure.

21 Q. -- but so she can take it down.

22 Have you had your deposition taken before?

23 A. Yes.

24 Q. So you understand it's a question-and-answer  
25 format; is that right?

1 A. Yes, I do.

2 Q. And what I'm going to ask you to do is to  
3 pause for a second before answering a lawyer's  
4 question to make sure that the lawyer's completed the  
5 question and also, again, to assist the court reporter  
6 in getting the answer --

7 A. Sure.

8 Q. -- down to your question. Is there any  
9 reason you can't take your deposition today, like  
10 you're on medication, lack of sleep, anything like  
11 that?

12 A. No.

13 Q. Okay. Lastly, if a person testifies in a  
14 deposition a certain way and they change their  
15 testimony if you're called at a trial in some manner,  
16 the lawyer or one of the lawyers have the right to  
17 point that out to the jury.

18 A. Sure.

19 Q. Do you understand that?

20 A. Yes.

21 Q. Great.

22 Could you tell us, what is your full name,  
23 please.

24 A. Homer G. Williams.

25 Q. And what's your date of birth?

1 A. 11-28-44.

2 Q. And what's your address?

3 A. 1308 N.W. Everett.

4 Q. If we need to contact you by phone for some  
5 reason, if you were called as a witness at trial, is  
6 there a cell phone number or some best number to reach  
7 you at?

8 A. Oh, my office is the best number.  
9 503-227-6593.

10 Q. And how tall are you?

11 A. How tall am I?

12 Q. Yes.

13 A. Well, this morning I was probably about five  
14 eight, but I'm probably about five seven and a half  
15 right now.

16 Q. Shrinking as the day goes on?

17 A. Yeah, absolutely.

18 Q. Did you have a chance to go to college after  
19 high school?

20 A. Yes. But I didn't graduate.

21 Q. Okay. Where did you go to college?

22 A. University of Oregon.

23 Q. Okay. Have you had any formal education  
24 beyond going to the University of Oregon?

25 A. No.

1 Q. What was your major there?

2 A. Political science.

3 Q. And what kind of work do you do?

4 A. I'm a real estate developer.

5 Q. How long have you been doing that?

6 A. About 35 years.

7 Q. Do you have any -- were you in the military?

8 A. No.

9 Q. Okay. Do you have any training in law  
10 enforcement?

11 A. No.

12 Q. Any training in medicine?

13 A. No.

14 Q. Any training being an EMT or emergency  
15 technician of any kind?

16 A. No.

17 Q. This incident happened in September of 2006.

18 At that time, did you either have a hearing aid of any  
19 kind or require glasses or corrective lenses in any  
20 way?

21 A. These for reading.

22 Q. That's it? And it was the same back then?

23 A. Yeah.

24 Q. Okay. Do you recall the incident where  
25 Mr. Chasse encountered the police at N.W. 13th --

1 A. Yes.

2 Q. -- and Everett?

3 And can you tell us what you were doing in  
4 that vicinity that day?

5 A. It happened in front of my office. I was  
6 across the street in the restaurant having lunch and  
7 there was a commotion and when I walked out I could  
8 see him on the ground.

9 Q. Okay. I'm going to stop you there, ask you  
10 a few questions, then we'll go back to your narrative.

11 A. Okay.

12 Q. Was anybody with you at that time?

13 A. Oh, I think I might have been having lunch  
14 with my sister, but I can't remember.

15 Q. And is the restaurant you mentioned Blue  
16 Hour?

17 A. Yes.

18 Q. And there is both a patio area at Blue Hour  
19 and an inside area, do you recall?

20 A. I was inside.

21 Q. And when you were sitting inside, was there  
22 anything -- is it just a curtain or wall of any kind  
23 that interfered with you seeing what was going on out  
24 on the street?

25 A. I didn't see what was going on until I

1 walked outside.

2 Q. Okay. And what caused you to walk outside?

3 A. As I said, there was a commotion, and I  
4 can't remember if it was waiters talking or whatever,  
5 but -- but there was obviously a disturbance, and so I  
6 just walked outside.

7 Q. And there is a porch area or a raised area  
8 out there?

9 A. Yes. That's where I was standing.

10 Q. And was there anyone standing in front of  
11 you or were you at the edge of that where I believe  
12 there's a fence?

13 A. I think I was at the edge.

14 Q. Okay. And when you looked out, what did you  
15 see?

16 A. Oh, I saw a person laying on the ground who  
17 was handcuffed who was on his stomach. At some point  
18 emergency vehicle came up.

19 Q. Okay. Let me stop you for a second. When  
20 you saw him handcuffed, were his hands behind his  
21 back?

22 A. Yes.

23 Q. And was any other part of his body that you  
24 could see confined or cuffed in any way?

25 A. I don't remember.



1 Q. All right. And what part of his body would  
2 have been facing you standing at Blue Hour?

3 A. I think his head was. Yeah.

4 Q. And by the head you mean the back of the  
5 head?

6 A. Yeah. I think he was -- if this is the  
7 street, he was laying down with his head down here.

8 Q. Okay. And when you say on his stomach was  
9 he fully on his stomach?

10 A. I think he was.

11 Q. All right. Did you notice his clothing?

12 A. Not particularly.

13 Q. Did you notice his appearance in any way?

14 A. Not particularly.

15 Q. Okay. So was anyone standing around him  
16 prior to any ambulance or medical people arriving?

17 A. Well, there were some -- I can't remember, I  
18 think two, maybe three police officers.

19 Q. And were they doing anything in particular  
20 when you observed them?

21 A. No. At that time he was -- he was just  
22 laying there.

23 Q. All right. Could you hear anything that the  
24 police officers were saying to each other?

25 A. No.

1 Q. Could you hear them saying anything to  
2 Mr. Chasse?

3 A. Not that I remember.

4 Q. Was Mr. Chasse saying anything to them or to  
5 anyone?

6 A. It's a little vague for me, because of what  
7 I read in the paper and -- you know, I'm not sure I  
8 heard anything.

9 Q. Okay. And ultimately some medical people  
10 arrived --

11 A. M-hm.

12 Q. -- is that right?

13 And did you see the vehicles pull up?

14 A. Yes.

15 Q. Do you know, can you describe the vehicles  
16 or who arrived?

17 A. Oh, it was -- you know, it was kind of -- it  
18 was an oversized van, you know. It wasn't an  
19 ambulance or anything like that, but it was one of  
20 those emergency --

21 Q. Okay.

22 A. -- vehicles.

23 Q. Did you see any other vehicle pull up other  
24 than perhaps a police car?

25 A. Not that I remember.

1 Q. Okay. And did you see -- what happened when  
2 the -- we'll call it the ambulance pulled up, what did  
3 you see happened next?

4 A. Well, people got out. There was a woman  
5 there who seemed to be in charge.

6 Q. And what did you see her do?

7 A. Not much. Not much.

8 Q. Was there any contact between her and  
9 Mr. Chasse, either words you could hear --

10 A. No.

11 Q. -- or did --

12 A. Not that I heard.

13 Q. Did she approach him?

14 A. Yes.

15 Q. Did she do anything to him or about --

16 A. Not --

17 Q. -- him?

18 A. -- that I remember.

19 Q. And how long do you think she stayed in the  
20 vicinity of Mr. Chasse?

21 A. I want to say ten or 15 minutes.

22 Q. Could you hear her saying anything to police  
23 officers?

24 A. No.

25 Q. Could you hear anything police officers were

1 saying to her?

2 A. No.

3 Q. Was Mr. Chasse saying anything, and by  
4 saying anything I mean articulating anything, making  
5 noises, anything lying that?

6 A. No.

7 Q. No?

8 A. No.

9 Q. So after Mr. Chasse had been on the ground  
10 for approximately ten minutes with the medical people  
11 there, what's the next thing that occurred?

12 A. The next thing I remember is him getting  
13 picked up and her leaving, which surprised me.

14 Q. Okay. And by him you mean Mr. Chasse?

15 A. Right.

16 Q. Okay. And how did -- how was he picked up  
17 or by whom was he picked up?

18 A. Alls I -- alls I remember, he -- I think  
19 they picked him up by his feet and his head. But I  
20 mean, just looked like a bag of bones, just -- and  
21 they dumped him in the back seat.

22 Q. Okay. And when they were moving him to the  
23 back seat, is this the back seat of a police car?

24 A. I think so.

25 Q. Did you see him actually being placed in the

1 police car?

2 A. I think so.

3 Q. And where in the police car was he placed?

4 A. In the back seat.

5 Q. All right. Was he making any -- was he  
6 saying anything or making any sounds at that time?

7 A. No.

8 Q. Did you -- during the transportation  
9 process, did you hear any officers saying anything  
10 among themselves?

11 A. No.

12 Q. Any EMTs speaking?

13 A. No.

14 Q. Any interaction --

15 A. No.

16 Q. -- between the police at all and the medical  
17 personnel?

18 A. No.

19 Q. And once Mr. Chasse was in the back of the  
20 vehicle, what happened to the woman EMT?

21 A. I think she was already gone.

22 Q. Okay. You think she left before he was  
23 placed in the car?

24 A. I think so, but I don't --

25 Q. All right.

1 A. -- remember.

2 Q. Do you recall whether there was any other  
3 EMT or medical personnel at the scene other than the  
4 woman?

5 A. Not that I noticed, but --

6 Q. When Mr. Chasse was on the ground, could you  
7 ever see his face?

8 A. I think he was actually facing the other  
9 way. I don't remember seeing his face.

10 Q. Okay.

11 A. I mean, his head was towards me, but I think  
12 his face was --

13 Q. Earlier you testified he was lying on the  
14 ground on his stomach. Was he moving at all?

15 A. When I saw him I don't remember him moving.  
16 If he would have been squealing or saying something, I  
17 think I would -- I mean, I would have walked over  
18 there.

19 Q. Okay.

20 A. Especially when she -- I remember thinking  
21 the woman wasn't doing what I would think she would be  
22 doing.

23 Q. Okay. Did you see any law enforcement  
24 officer strike Mr. Chasse?

25 A. No.

1 Q. A blow of any kind?

2 A. (Shakes head.)

3 Q. Did you see a law enforcement officer kick  
4 Mr. Chasse at all?

5 A. No.

6 Q. Use any kind of an implement, a night stick  
7 or a Taser or anything like that, on Mr. Chasse?

8 A. No, no.

9 Q. Did you see Mr. Chasse do anything to an  
10 officer such as resist, bite, or anything like that?

11 A. No.

12 Q. When Mr. Chasse was being carried away,  
13 could you see his face?

14 A. I don't remember seeing his face.

15 Q. Okay. Looking at Mr. Chasse, could you see  
16 any objective signs of any injury to him?

17 A. No.

18 Q. Once Mr. Chasse was placed in the vehicle  
19 and he left the scene, did other law enforcement  
20 officers stay around there?

21 A. I think -- yeah, I think I gave my name  
22 to -- no, I didn't actually. I called on an article,  
23 and a police officer left his name and number.

24 Q. How long did you stand observing the scene  
25 after Mr. Chasse left?

1 A. Not very long.

2 Q. Do you have an estimate of how long that  
3 was?

4 A. A few minutes.

5 Q. Did you hear any of the police officers make  
6 any statements?

7 A. No.

8 Q. Did you hear anything that day about drugs?

9 A. No.

10 Q. Did you hear anything that day standing on  
11 the porch about anyone's history of criminal  
12 convictions, anything like that?

13 A. Nothing.

14 Q. Did you confer with any of the officers in a  
15 way that you haven't told us about?

16 A. No.

17 Q. And did they say anything to you you've not  
18 told us about?

19 A. No.

20 Q. Were you surprised to hear Mr. Chasse had  
21 died?

22 A. Yes.

23 Q. How did you learn about that?

24 A. I read about it in the paper.

25 Q. Okay. And you read The Oregonian?



1 A. (Nods head.)

2 Q. Yes?

3 A. Yes.

4 Q. And is that the principal source of yours  
5 news, local news?

6 A. Yes, probably.

7 Q. Okay.

8 A. I'm a news junky.

9 Q. Lots of sources?

10 A. Lots of sources.

11 Q. Have you been following the newspaper  
12 stories about Mr. Chasse and the lawsuit?

13 A. Whenever I see them I'd read them.

14 Q. Okay. Did you testify at the grand jury?

15 A. No.

16 Q. Okay. Have you given any statements to  
17 anybody about what you saw that day other than to a  
18 police officer?

19 A. Somebody from the city contacted me, ex-FBI  
20 agent.

21 Q. Okay. And you gave that person a statement?

22 A. Yeah.

23 Q. Did they say they were from the city?

24 A. They were working for the city and/or  
25 county. I can't remember which.

1 Q. Okay. Did you review any documents today --  
2 or in recent days prior to coming to have your  
3 deposition taken?

4 A. No.

5 Q. Okay. That's all the questions I have.  
6 Some of the other lawyers may want to ask you a  
7 question.

8 EXAMINATION

9 BY MS. DUNAWAY:

10 Q. My name is Susan Dunaway. I represent the  
11 county. And I just have a couple of questions.

12 A. Sure.

13 Q. But first, as I've been asking all the  
14 people who were actually there that day to take a look  
15 at this diagram, study it for a second.

16 A. Sure.

17 Q. Does that diagram make sense to you?

18 A. Yep.

19 Q. Okay. What I need for you to do is, this  
20 one is blue, if you could put a 1 and a circle on  
21 where you were standing.

22 A. Right there.

23 Q. Okay. And can you then draw a stick figure  
24 of Mr. Chasse and where he was laying on the ground?

25 A. This is what I remember. I'm be curious to

1 see what this really was because my memory is --

2 Q. And could you put an arrow in the  
3 direction -- put an arrow by where you've drawn the  
4 head in the direction in which Mr. Chasse was facing?

5 A. That way.

6 Q. Okay.

7 A. The car was here.

8 Q. Okay. Can you put a 3 in that car for -- to  
9 show where you saw a police car?

10 A. Well, this was the --

11 Q. Or was that the -- that was the ambulance?

12 A. Yeah, yeah.

13 Q. Okay. Did you see any police cars in that  
14 area then?

15 A. I think I remember -- I think there was one  
16 here because I think that's where they put -- where  
17 they put him.

18 Q. And that's your recollection that that was?

19 A. Yeah.

20 Q. A police car?

21 A. Yeah.

22 Q. When you were looking at Mr. Chasse,  
23 approximately how many police officers were standing  
24 near him?

25 A. I just remember a couple.

1 Q. Just a couple?

2 A. Yeah.

3 Q. Could you put a 5 and a 6 on where you think  
4 they were standing?

5 A. This is really starting to guess.

6 Q. All right. And then over here by the 1, can  
7 you put your initials?

8 A. (Witness complied.)

9 Q. Okay. When you were standing up here on the  
10 balcony, were there other patrons or employees  
11 standing around you?

12 A. Yeah. There were two or three people, I  
13 don't know who they were. They were there. A couple  
14 of them were there earlier than I was.

15 Q. Did you have any conversation, while this  
16 was going on, with any of those people?

17 A. Well, like I said, there was a commotion  
18 that brought me outside and I got the feeling that a  
19 couple were a little disturbed.

20 Q. A couple of the patrons --

21 A. Yes.

22 Q. -- were disturbed?

23 Did they say anything to you that made you  
24 believe that?

25 A. Well, they just -- I can't remember the

1 conversation, except I remember they were disturbed.

2 Q. But they didn't communicate to you why they  
3 were disturbed?

4 A. If they did I didn't remember.

5 Q. And --

6 A. You know, I mean, you've got a guy on the  
7 ground and cops there and he's handcuffed. I used to  
8 live down on First and Oak so I walked China Town up  
9 to my office forever. You know, some -- some of these  
10 guys -- you know, the police -- I'm not saying that  
11 they are overly rough, but, you know, you see a lot of  
12 people getting handcuffed and a lot of people on the  
13 ground.

14 Q. So --

15 A. So, you know, to me it didn't ring a big  
16 bell.

17 Q. This wasn't the first time you had seen  
18 somebody --

19 A. No.

20 Q. -- laying on the ground handcuffed?

21 A. No.

22 Q. Okay. So I'm taking it from what you said  
23 that you had no conversation with the patrons on --

24 A. No.

25 Q. Okay.

1 A. Not that I remember. I mean --

2 Q. Okay. Did this situation then seem  
3 particularly different than other situations you had  
4 seen where people had been arrested and handcuffed?

5 A. Well, the only -- I was surprised, A, that  
6 the ambulance seemed to not get involved more. And  
7 when they picked him up and put him in the car, I  
8 remember thinking -- I mean, you know, it was -- if  
9 he's in that kind of shape where they can't stand him  
10 up and put him in the car, why didn't he go in the  
11 ambulance?

12 Q. Okay. Did anyone communicate to you that he  
13 was unable to stand up?

14 A. No.

15 Q. Okay. And so that was your presumption that  
16 he was unable to stand up?

17 A. Yeah.

18 Q. Okay. Do you remember how many officers  
19 were carrying him to the car?

20 A. No.

21 Q. And do you remember what parts of his body  
22 they were holding to be able to take him to the car?

23 A. I just have this vision of a bag of bones  
24 to, you know, put in something. And that's all I  
25 can --

1 Q. That's all you can remember?

2 A. Yeah.

3 Q. Okay. I don't have any more questions.

4 EXAMINATION

5 BY MS. GAMBLIN:

6 Q. Mr. Williams, we met quickly. I'm Amanda  
7 Gamblin, and I represent the ambulance company, AMR.

8 I just have a few questions. From my  
9 understanding of your testimony, you -- when you first  
10 came out on the patio and observed Mr. Chasse, the  
11 ambulance was not yet there. Is that correct?

12 A. I don't think so, no.

13 Q. Okay.

14 A. Yeah.

15 Q. Do you remember how much time passed between  
16 the time you stepped out on the patio and the time the  
17 ambulance arrived?

18 A. It would have been just a matter of a few  
19 minutes.

20 Q. And when the ambulance arrived, was  
21 Mr. Chasse already restrained?

22 A. Yes.

23 Q. Okay. And you said he was handcuffed  
24 meaning his arms were handcuffed. Do you know, had  
25 his legs were restrained?

1 A. I don't -- I can't remember that.

2 Q. And when the ambulance arrived, you recall a  
3 woman, medical personnel, Mr. Rice referred to her as  
4 an EMT. And do you remember any other medical  
5 personnel that were from the ambulance?

6 A. I think there was one other, but she seemed  
7 to be the one in charge.

8 Q. Okay. And what gave you the impression that  
9 she was in charge?

10 A. She's the one that approached, seemed to be  
11 talking.

12 Q. She approached who?

13 A. When she approached where he was and the  
14 police.

15 Q. Did she approach the police specifically?

16 A. Well, she got out the car and walked over.

17 Q. Okay. And did you observe her talking to  
18 the police?

19 A. Yes. But I couldn't hear anything.

20 Q. And did she -- then she also approached  
21 Mr. Chasse?

22 A. Right.

23 Q. Okay. Did she approach the police first or  
24 Mr. Chasse first?

25 A. Oh, I think they're both in the same place.



1 Q. Okay. And did you observe her speak to  
2 Mr. Chasse?

3 A. No.

4 Q. Okay. Did you observe the female EMT bend  
5 down or in any way take note of Mr. Chasse?

6 A. I -- I don't really remember either way.

7 Q. Did she take any equipment out of her  
8 emergency bag with her when she approached the police  
9 officers and Mr. Chasse?

10 A. Not that I remember.

11 Q. And I'm going --

12 A. The only caveat I have to that is I remember  
13 being surprised when she left and then -- and he  
14 didn't go with her for some reason. But I think it  
15 was -- I think what really registered, I just didn't  
16 see her getting enough information from him. I think  
17 that's really --

18 Q. And when you say you didn't see her getting  
19 enough information, what -- what is it that you  
20 expected to see that you didn't see?

21 A. Well, I think that, as I said, I was kind of  
22 surprised that she just got there and then they packed  
23 up and were gone, and then they picked him up and put  
24 him in the car.

25 Q. Did the female EMT pick him up and put him

1 in the car?

2 A. No, not that I -- no. I'm pretty sure she  
3 was gone by then.

4 Q. Okay. You just said she -- that they packed  
5 up and left, meaning the female EMT and if there was  
6 another EMT on the scene, then they packed up --

7 A. Yes. I think --

8 Q. Let me finish my question.

9 A. Yeah, okay.

10 Q. And so does that mean that they had medical  
11 equipment with them then?

12 A. Well, if they did, it went back in the car.  
13 But I don't -- I don't -- I'm trying to remember if I  
14 remember a gurney coming out, but I just don't  
15 remember.

16 Q. So let me ask you this way: What did they  
17 pack up when they left?

18 A. Like I said, I don't remember.

19 Q. Okay. But you know they packed something  
20 up?

21 A. I don't even know that for sure.

22 Q. Okay, okay.

23 A. All right.

24 Q. Did you observe the female EMT take a blood  
25 pressure?

1 A. Not that I remember.

2 Q. Okay. Check Mr. Chasse's pulse?

3 A. Not that I remember.

4 Q. Check his heart rate?

5 A. None of that.

6 Q. Okay. Is it that you don't remember whether  
7 she did it or not, or is it that you think she didn't  
8 do it?

9 A. I don't remember seeing her do it.

10 Q. Okay. So do you know, sitting here today,  
11 whether she did any of those things or not?

12 A. No, no.

13 Q. Okay. So what leads you then to express  
14 surprise that -- that the female EMT left without  
15 taking Mr. Chasse in an ambulance?

16 A. What I was surprised is if he couldn't get  
17 up and walk him to the police car, they had to pick  
18 him up and put him in the car -- it just surprised me.

19 Q. Okay. And, again, you don't know whether  
20 his legs were restrained or not; correct?

21 A. No.

22 Q. Okay. And did you observe anything that you  
23 felt would convey to the female paramedic that  
24 Mr. Chasse was seriously injured to an extent that  
25 would require emergency transport in an ambulance?

1 A. You mean did I see something that --

2 Q. (Nods head.)

3 A. No.

4 Q. Okay. That's all the questions I have.

5 EXAMINATION

6 BY MR. STEENSON:

7 Q. Mr. Williams, my name is Tom Steenson. I'm  
8 the lawyer representing the Chasse family.

9 A. M-hm.

10 Q. I have a police report that was written by  
11 Detective Courtney. It indicates that he conducted a  
12 taped phone interview of you on September 24th of 2006  
13 which would have been about a week after --

14 A. Yeah.

15 Q. -- this happened. Do you recall that?

16 A. He was the one that I called.

17 Q. Okay. Why did you call?

18 A. Well, I saw that he died. I read that in  
19 the paper. And the questions that I mentioned, you  
20 know, came -- excuse me, came back to me. And -- and  
21 I didn't see him go down, get tackled or any of that,  
22 so, you know -- but I just thought I should call and  
23 just give what my impressions were.

24 Q. Okay. There's also a transcript, I have a  
25 transcript of the interview. You haven't seen that

1 transcript?

2 A. No. I'd be curious what I remember today  
3 and what -- what I remembered then.

4 Q. I assume, based upon what you've told me,  
5 you were trying to be honest with the detective and  
6 tell --

7 A. Sure.

8 Q. -- what you saw or heard?

9 The transcript, it says that at one point --  
10 or at a point you thought Mr. Chasse was unconscious.  
11 Do you recall thinking that at some point?

12 A. Well, I think, again, I just had this vision  
13 of this bag of bones going in the car. I mean, if he  
14 was conscious and he was all right, he would have --  
15 they'd have pulled him up and walked him to the car.  
16 That was what was confusing to me.

17 Q. You also told the detective that he seemed  
18 to be in a lot of pain. Do you recall thinking that  
19 at some point?

20 A. Yeah. I mean, I've debated. When I first  
21 went out I went out, I came back in, and then I went  
22 back out. And I know when I came back out it was  
23 quiet. What I don't remember when I first went out  
24 there was this commotion and, you know, I can't  
25 remember whether it was him squealing or the people

1 that were on the deck, you know, that were there that  
2 were upset by it. And so I just --

3 Q. Okay.

4 A. I don't remember.

5 Q. You also told the detective that when he  
6 woke up again he was, you know, squealing. So was  
7 there a point when he seemed to wake up and was  
8 squealing or making noises?

9 A. Well now, you know, it's hard for me to  
10 remember, but -- you know, that probably is accurate,  
11 if that's what I said. But there was a point where  
12 there was just nothing happening.

13 Q. Sure.

14 And do you think you were there with your  
15 sister or someone else or you just can't recall?

16 A. I think it was my sister --

17 Q. Okay.

18 A. -- but --

19 Q. Did she go out on the patio so she could see  
20 or hear anything, do you recall?

21 A. You know, I -- geez, I'd have to ask her. I  
22 just don't recall.

23 Q. Would you mind giving me her name and a  
24 phone number?

25 A. Yeah. It's Shannon Brown, 503-504-3939.

1 Q. That's all I have. Thank you.

2 I think we're done. Thanks.

3 MR. RICE: Thanks for coming in.

4 THE WITNESS: All right.

5 (The deposition concluded at 1:31 PM.)

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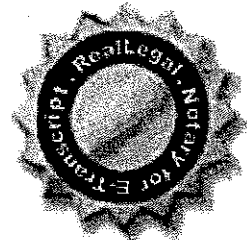
C E R T I F I C A T E

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF CLARK )

I, Shannon K. Krska, a Certified Shorthand Reporter for Oregon, do hereby certify that, pursuant to stipulation of counsel for the respective parties hereinbefore set forth, HOMER G. WILLIAMS personally appeared before me at the time and place set forth in the caption hereof; that at said time and place I reported in Stenotype all testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were reduced to typewriting under my direction; and that the foregoing transcript, pages 3 to 31, both inclusive, constitutes a full, true and accurate record of all such testimony adduced and oral proceedings had, and of the whole thereof.

Witness my hand and CSR stamp at Vancouver, Washington, this 11th day of August, 2008.

*Shannon K. Krska*



Shannon K. Krska  
Certified Shorthand Reporter  
Oregon CSR No. 90-0216