PLAINTIFFS' EXHIBIT 2

DEPOSITION OF JANENE THORPE

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

JANENE THORPE, an individual; CHRISTOPHER THORPE, SR., an individual, CHRISTOPHER THORPE, JR., an individual; CHARLIE THORPE, an individual,

Plaintiffs,

v.

CEDAR HILLS CITY, a government entity; AMERICAN FORK CITY, a government entity; AMERICAN FORK CITY POLICE DEPARTMENT, a government entity; DARREN FALSLEV, in his official capacity and individual capacity as AMERICAN FORK POLICE CHIEF; C. SLATE BLACKBURN, in his official and individual capacities; PHILLIP W.S. CRAIG, in his official and individual capacities; JENNIFER L. NAKAI, in her official and individual capacities, KANDACE N. KONECHNY, in her official and individual capacities; SETH WIATE, in his official and individual capacity; and JOHN or JANE DOES, 1-15, in their individual and/or official capacities,

Defendants.

Case No.
2:23-cv-00242-AMA-DAO

Judge David Barlow
Magistrate Daphne A. Oberg

Hybrid Videoconference
Video-Recorded Deposition
of:
JANENE THORPE

March 7, 2025
9:11 p.m. to 2:56 p.m.

Witness location:
HEIDEMAN & ASSOCIATES
2696 North University Avenue, Suite 180
Provo, Utah 84604

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Rossann J. Morgan
- Certified Court Reporter -
- Registered Professional Reporter -
Job No. CRCC7156192

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ALSO PRESENT: Janene Thorpe (via Zoom)
Chandler Goodwin (via Zoom)
McKayla Largin (Videographer)

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March 7, 2025 9:11 a.m.

P R O C E E D I N G S

VIDEOGRAPHER: Good morning. We are going on the record at 9:11 a.m., on March 7, 2025. This is Media 1, deposition recording of Janene Thorpe in the matter of Thorpe, et al. versus American Fork, et al., filed in the District Court for the District of Utah Central Division; Case No. 2:23-cv-00242-AMA-DAO. This deposition is hybrid over Zoom and at Strong & Hanni in Sandy, Utah. My name is McKayla Largin. I'm the videographer; and Rossann Morgan is the court reporter.

Will also counsel state who they represent for the video record.

MR. FORD: Michael Ford for American Fork.

MR. GUELKER: Gary Guelker, also for American Fork and the American Fork defendants.

MR. BOSSERMAN: Hyrum Bosserman on behalf of the City of Cedar Hills.

MR. PEAT: Norman Pete representing the plaintiff, the Thorpe family.

VIDEOGRAPHER: Will the court reporter swear in the witness.

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JANENE THORPE,
called as a witness by and on behalf of Defendant American Fork, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. FORD:

Q. Thank you. Good morning, Janene. Do you mind if I call you "Janene" today?

A. That's fine.

Q. Thank you. My name is Mike Ford, and I represent American Fork and its officers that are named in this lawsuit. You were present for the depositions of your two sons yesterday and heard my little introduction about how things go in a deposition, a few things to -- to keep in mind. I may remind you as we go through the process today, but I won't go through my usual spiel as we get started today.

I do understand that you may need to take frequent breaks. Please let me know if you need to take a break. I'll accommodate you however I can. If you need me to repeat a question, please let me know that. If you need me to rephrase a question, if you don't understand it, please let me know. I want to make sure we get your best testimony today. Okay?

A. Okay. Yes.

Q. Thank you. And as -- as I mentioned before we went on the record, if you don't know something, let me know that you don't know that. I really am interested in your testimony at the moment and can't have assistance from others unless your attorney gets involved. But just let me know if you don't know, don't remember. I'm happy to work with you. I just want to make sure I'm getting your best testimony. Understood?

A. Understood.

Q. All right. Have you had your deposition taken before?

A. I have.

Q. How many times?

A. Once.

Q. And do you remember when that was?

A. It was probably a year ago.

Q. Was that in connection with a lawsuit involving the Sanchezes?

A. I believe so, yes.

Q. And did that involve the dog-bite incident?

A. Yes.

Q. Okay. So you -- you've been through this process before. I'm going to have to do a lot of the same type of things we did in that other one, ask you a lot of background information and things. A lot of this

will be covering ground that was covered with your sons yesterday, but I want to make sure that I got everything right, according to your memory.

Some background information on you. What's your date of birth?

A. 2/9/69.

Q. And what is your current address?

A. 9267 North Canyon Heights Drive, Cedar Hills, Utah, 84062.

Q. All right. And how long have you lived at that address?

A. Eight years.

Q. Since around 2017?

A. '16.

Q. All right. And before that, was it Elk Ridge that you lived?

A. Correct. Yes.

Q. And you're married?

A. Yes.

Q. What's the name of your husband?

A. Chris Thorpe.

Q. And when were you married?

A. Back in the -- nineteen-eighty- -- what -- what do you need? What year?

Q. I would -- I would love the date of your

marriage, if you can remember that.

A. March 24, 1989. I don't understand the reason you need to know the year or what -- what's the purpose. What does this have to do with it?

Q. I understand. And I'll just ask you to bear with me and answer the questions that I ask.

A. Okay.

Q. You may not know where I'm going with a lot of my questions, and just understand that your attorney's here to object when the question's objectionable.

A. Okay.

Q. And only if he instructs you not to answer --

A. All right.

Q. -- we'll be okay with you not answering. Okay?

A. Okay. Okay.

Q. Appreciate that.

A. All right.

Q. How many children do you have?

A. Four.

Q. And I -- I talked to Taylor and Charlie yesterday. Who -- who else?

A. I have two daughters.

(Mr. Goodwin entered the Zoom proceedings.)

Q. (BY MR. FORD) And are they older?

A. Yes.

Q. What are their names?

A. Brittney and Holli.

Q. All right. And -- and I think I understood from Taylor yesterday that Holli is married.

A. Correct. Yes.

Q. And Brittney is not?

A. That's -- yes, that's correct.

Q. All right. Holli lives in Elk Ridge?

A. Yes.

Q. And Brittney lives, I -- was it in Pleasant Grove?

A. Yes.

Q. All right. Charlie was also recently married?

A. Yes.

Q. And he lives in Orem?

A. Yes.

Q. And Taylor is single and lives at home with you?

A. Part time, yes.

Q. What do you mean by part time?

A. You know -- yes, he lives at home with us.

Q. Okay. That's not definite, but at the moment he lives at home. Is that what you were saying?

A. Yes.
Q. Okay. What is your highest level of education you've completed?
A. Associate's degree.
Q. And what was the degree in?
A. I have -- in interior designing.
Q. All right. And where did you obtain that degree?
A. In California.
Q. All right. Are you currently employed?
A. No.
Q. When was the last time you were employed?
A. 2016.
Q. And what did you do for work in 2016?
A. I worked in the medical field.
Q. What exactly was it?
A. I was a nurse's assistant.
Q. All right. Why did you stop working at that time?
A. I -- personal reasons. I had a -- I had a brain tumor.
Q. All right. I appreciate you sharing that and I'll tell you, I've seen your medical records. So I'm aware of that. I understand you had a surgery on the brain tumor in 2018. Is that right?

A. Yes.
Q. And I understand that you --
MR. CHRISTOPHER THORPE: She's going to (indiscernible).
(Court reporter interrupted.)
THE WITNESS: Can I have a break?
MR. FORD: Yes.
VIDEOGRAPHER: We are off the record. The time is 9:21.
(A brief break was taken.)
VIDEOGRAPHER: We're back on the record. The time is 9:27. Counsel may proceed.
Q. (BY MR. FORD) Thank you. So I was indicating to you that I -- I've seen your medical records. I'm aware of what's in many of those records. So I'm -- I'm going to have some questions about your medical condition, mainly because you are claiming injuries in this case. So I need to understand what your conditions were before and after the incident with the American Fork police officers. Do you understand that?
A. Yes.
Q. All right. So in -- in 2018, you had a brain surgery for the tumor; correct?
A. Correct. Yes.
Q. And I understand around that time you were

also diagnosed with a seizure disorder.
A. Yes.
Q. Do you continue to suffer from seizures?
A. Yes.
Q. How often do you have seizures?
A. They're random.
Q. And can you say, like, in a given month how many time you have -- how many times you have a seizure?
A. I can't.
Q. I understand that there's a lot of different kinds of seizures and that they, you know, vary widely in severity. Maybe you can help me understand what your seizures are like when you have them.
A. They're -- you know, I'm not a doctor. They're quiet, silent seizures. So they're -- they're, I would say, the most severe because they're quiet, silent. So I -- I can't drive, if that's what you mean.
Q. That -- that's a part of what I mean. I really -- I'm not asking a doctor's opinion. I just want to know what you experience when you experience a seizure.
A. When I experience a seizure, I don't even know I'm having it. It's that -- it's that -- it's that -- like I said, I'm not a doctor. I can't tell you because it happens and it's very -- it's actually causing

damage to me.
Q. Understood. You don't know that you're having it?
A. Of course not.
Q. That -- that's -- I'm just trying to clear the record on this. So the only time you know you've had a seizure is if somebody points it out to you?
A. Correct.
Q. When's the last time somebody pointed out to you that you'd had a seizure?
A. We were having a family meeting and -- family member noticed it. And that's all I can say.
Q. Do you remember how long ago that was?
A. Few month -- few months ago.
Q. I saw in -- go ahead.
A. It can happen when I'm sleeping. It can happen anytime, from what the doctors say.
Q. I think I saw in one of the documents that was submitted in this case that stressful situations can bring about the seizures. Has that been your experience?
A. It can be.
Q. Is it your understanding that your medical providers have recommended that, for example, you don't appear in court or in a deposition to give testimony in person because it might induce a seizure?

A. Yes.
Q. Okay. I appreciate you helping me understand that. I saw from your medical records that you also have had multiple slip-and-fall accidents. I think there was one in 2017 where you suffered a concussion. Do you remember that?
A. That was due to finding out about the tumor that was growing in my brain.
Q. And was that when you went in and got treatment for that slip-and-fall was when they discovered the tumor?
A. That was part of it.
Q. Okay. And did doctors tell you that they thought that having the tumor might have been why you slipped and fell?
A. Yes. Eventually.
Q. Okay. That's what the doctors eventually concluded?
A. Yes.
Q. All right. Have you had other falling-down incidents as a result of your seizure disorder?
A. I'm not a fall risk, if that's what you mean.
Q. Okay. That was what I meant. But you're not able to drive?
A. When you have seizures, you're not supposed

to drive.
Q. Okay. And so you -- you don't drive?
A. No. Not right now.
Q. All right. You do have an active driver's license?
A. I do.
Q. Okay. I want to talk about the incident that happened in April, April 23rd, 2021, that involved the American Fork police officers coming into your home. Do you remember that event?
A. I do.
Q. Have you had a chance to review the body-cam footage?
A. You know, lately or...?
Q. Ever.
A. Briefly and very briefly. One time. And it was very brief.
Q. Okay. Was that in close time to when the incident happened or was it recently?
A. I'm sorry. I couldn't hear you very clearly. Can you repeat?
Q. Of course. When you reviewed the body-cam footage, was it close to when the incident happened or was it more recently?
A. No. It was probably about a year after it

happened.
Q. And how much do you remember of the body-cam footage?
A. And I only saw, like, about -- very minimal.
Q. Okay. And --
A. It was heartbreaking.
Q. Okay. I was going to ask you if that was the reason why you only saw a short portion of it, was because it was traumatic?
A. Correct. Yes.
Q. All right. So I want to ask you about events that took place during that incident. And I don't know if -- if your memories will come from the actual event or from the body cam that you looked at, but I need you -- to ask you some questions about what happened in that incident.
It -- it happened on April 23rd, 2021. Do you remember what you were doing earlier that day?
A. Yes.
Q. Tell me what you remember you did earlier that day.
A. I believe I was with my husband, Chris, and my son. And we were -- we had a neighbor next door who was moving and she was trying to sell a piece of furniture and she was alone and she had wanted some help

with this couple coming over. She didn't want to be by herself. And so she asked us if we could come over and just be there because these people were strangers and she didn't want to be there by herself.
Q. All right.
A. So we came over and while we were there, we helped her do a little bit of packing and we -- we were there --
Q. Was --
A. -- when --
Q. Oh, go ahead. Sorry.
A. No. We stayed there for a little bit, talked to her. Can't remember everything that happened. We were there for awhile, it seemed like. My son and my husband eventually went home. She had asked me to stay a little longer, which I did. And I don't remember what I did, but I stayed a little longer. By the time I left, it was dark and I walked home. It was just right next door. I came home and --
Q. Do you remember the -- sorry. Be -- just before we move on, do you remember the name of this neighbor?
A. Yes.
Q. And what was it?
A. Anyways, I came home --

Q. Sorry. What was the name of the neighbor?
A. Arlene.
Q. I just need your memory. I -- I really don't -- if you don't remember, that's fine, but I -- I can't have you getting help. Okay? So her name --
A. I can't what? I couldn't hear what you said.
Q. I just can't have you getting help from anybody else in the room.
MR. PEAT: Michael, no -- nobody's --
THE WITNESS: No.
MR. PEAT: -- helping her.
THE WITNESS: No.
MR. PEAT: She answered the question. Did you not --
THE WITNESS: I --
MR. PEAT: -- hear the answer?
THE WITNESS: I said -- I said her name.
Q. (BY MR. FORD) It was Arlene?
A. Correct. Yes.
Q. Okay. Do you remember her last name?
A. I can't remember it right now. I -- I could give it to you later.
Q. Not a problem. I'm just interested in your memory.
A. I'm -- I could -- give me a second. Is it

really crucial to this?
Q. I'll just tell you, if you don't remember something, you can just tell me you don't remember and that's totally fine. I -- I'm just interested in your memory.
A. Hold on. Steiner.
Q. All right. Thank you.
A. Yes.
Q. And she's since moved?
A. Correct. Yes.
Q. She moved around the time of the incident in 2021?
A. Correct. Yes.
Q. All right. Have you kept in contact with her?
A. I have tried -- I mean, no. No.
Q. All right.
A. But -- no.
Q. All right. Can you give me an estimate of how many hours you spent at Arlene's that day?
A. Maybe a couple hours. Few hours. A -- a couple hours.
Q. All right. When you walked home from her house, it was dark outside?
A. It was.

Q. Okay. So if you'd spent a couple hours over there, it would have been sometime mid-afternoon that you went over there?
A. No. It was -- I -- you know, you're throwing me off because we're stopping and we're going and -- I don't know. All I know is it was dark when I'm coming home.
Q. All right.
A. So it's probably, like -- you know, I don't know. It's probably about 8:30, 9:00. Dark now.
Q. All right.
A. And...
Q. Were -- were you finished?
A. Oh, I was waiting for you to ask me another question.
Q. You're great. I appreciate that. I --
A. Oh. Oh --
Q. -- just didn't want to --
A. -- yeah.
Q. -- cut you off if you were thinking about something. We're totally fine. We're going to get through this.
A. Okay.
Q. So you got home and it was dark. How long --
A. Yeah, it was just, like, next door. So I

walked home.
Q. Okay.
A. I walked home.
Q. All right. How long were you home before the police came to your home?
A. I was home maybe five minutes. I said hi to my husband. I told him I was just going to go in the kitchen, get a drink, and go get myself ready for bed and come back and -- and finish talking to he and my son, Charlie.
And so I went in the kitchen to go get the drink, and I was in the kitchen less than a couple minutes when -- I didn't even hear the door knock. I just heard -- I just -- I just was in the kitchen and I heard my husband talking pretty loudly. And I leaned over to see what was going oh -- going on.
And I talked to my son and -- you know, he's kind of a teenager -- and said, "What's going on?" And he just shrugs his shoulders, still watching TV. And he says, "I don't" -- like, "I don't know what's going on." Like, he could care less.
And I go back into the kitchen, go the other way to put my drink down and my husband's coming the other direction and he meets me. And he says, you know, "Come over here, they want some" -- you know, I could

tell it wasn't good. And I could hear that it was getting worse and it was escalating. And he says, "The police are here," or something to that effect.

And I walk over there and, you know, I know -- I know this dialogue isn't correct, but I go to the door and they're yelling -- they're -- they're talking to me. They're not yelling quite, but they're very frustrated and their -- their demeanor and everything's not good. And they're asking all these questions and they're wanting me to come outside, and they're asking me to do this, and there's no way I'm going outside to talk to them. I mean, I'm right there. I don't need to come outside. I could tell from their demeanor they want to pounce on me. I mean, you don't have to be stupid to realize that -- what they want to do. You know, I -- I've never -- I've never been in a situation like this.

And I told them that -- I told them, I said, "I don't have to come outside." I said, "I've talked to my lawyers," and -- I believe that's what I told them. My lawyer says just to stay in the house and talk to them from here. And they said, "No, you need to come out here," and blah, blah, blah. And, like, so...

Q. All right. Thank you. So do you happen to recall the part of the body-cam footage that you reviewed? Was that of them standing outside or do you

remember what part of the body cam you reviewed?

A. Yeah. Yeah, I saw them outside. Yes.

Q. Okay. Did you see on the body cam when they entered your home?

A. I did.

Q. All right. So at some point during this incident with the police when they were outside, it then changed and they entered your home; correct?

A. Correct.

Q. And what did -- what did you do at that point?

A. When they entered my home?

Q. Right.

A. It was traumatizing because they didn't just enter my home. These men were bullies. They didn't just enter my home.

Q. Do you remember what you did when they entered your home?

A. I felt like I had no way to do anything. And these men are supposed to protect and serve and they did -- they just basically raped my home. They pushed through my home.

Q. I -- I want you to listen to my question and do your best to answer it. What did you do when they entered your home?

A. I was -- there was nothing I could do. I had three men at my house. Three men at my home; my husband and my two sons. And there was nothing I could do.

Q. Is it your recollection that you did nothing or -- or did you --

A. I couldn't do anything. I was lifeless.

Q. Do you remember retreating back further into your home?

A. Yes. I need a break.

Q. Sure.

VIDEOGRAPHER: Going off the record. The time is 9:49.

(A brief break was taken.)

VIDEOGRAPHER: We're back on the record. The time is 9:57. Counsel, proceed.

Q. (BY MR. FORD) All right. So I know this -- this may be difficult to bring back traumatic memories. I -- I am very interested to know your memories of the events. And so we'll do our best to -- to get through what you remember about the incident and the officers coming into your home.

I had asked you if when the officers came in your home if you retreated back further into your home, and you said yes. Do you remember, was it one of the officers or both of the officers that initially took hold

of you inside your home?

A. It was Craig that initially was more aggressive, that more or less stepped into my home and more or less came after -- actually was aggressively -- kicked our door. Forced his way into our home, kicking our door. I remember that, kicking the door and -- which he had no right to do. There was no reason to do that.

In doing so, he hit -- kicked the door in, hit my husband in the head.

Q. Did you see that --

A. And --

Q. -- or was that something that your husband told you?

A. No. I was aware of that.

Q. You -- you saw that happen?

A. I was right next to him.

Q. All right. I just want to confirm. You -- you saw the door hit your husband's head?

A. I was right next to my husband because -- I was right next to my husband because I trusted him. I was always right next to him because he was always protecting me.

Q. All right.

A. He always was there. Like I said, how many years have we been married? If you're going to ask me

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how many years we've been married --
Q. No. What -- what I want -- what I asked you --
A. What would --
Q. -- that I just want you to confirm, did you see the door hit your husband's head?
A. I heard the door hit my husband's head.
Q. Okay. That's -- that's helpful to me.
A. That is horrible. It hit my husband and he's trying to protect me. And when I realized it hit him and he's basically seeing stars -- and when I say he's seeing stars, it's caused him a concussion -- then I realize I'm on my own. And I'm backing up further, trying to get away from these monsters who are coming into our home, who have no right to come into our home, who shouldn't be in our home, who have absolutely no reason to come into our home, for no reason. Absolutely no reason. No right, no purpose, no nothing, should be giving -- putting that paper on the doorstep because there's -- Sergeant Nakai told them to put -- forced them to -- forced them -- to send them with a paper and sign -- have us sign it and think that we don't know our rights --
Q. Janene --
A. -- which we do.
Q. -- I -- I -- I apologize. I want to give you

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every opportunity to fully answer my questions, but I also want you to listen and answer my questions. Okay?
A. Okay.
Q. All right.
A. I will go back.
Q. No, you're -- you're fine. What I had asked you is if you saw the door hit your husband's head, and you told me you heard it. And then --
A. I saw the door. I heard the door. I was standing right next to my husband.
Q. I -- I understand that. So I understand that point. I'm now going to move on to -- to my next question. And I want to ask you to focus on the question that I ask and answer the question that I ask so that we can move through this quickly. Okay?
A. Well, can I -- can I pause for a second?
Q. Of course. I want to give you every opportunity to fully answer my questions. I just want to be sure you're answering my questions.
A. I want to pause for a second. You're making me reminisce through this. We're not going to go through this real quick. You're going to make me go through this and go through this horrible experience. You've got to listen to me too, and I can't go through this really quick. You're going to have to listen to my version of

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it.
Q. Janene, I will let you --
A. And I can't go through it really quick.
Q. I will let you fully answer each of my questions, but I want you to answer my question and not veer off onto another topic. Okay?
A. Okay. I will do the best.
Q. Okay. And if there's anything that I don't cover, you've got an attorney that can ask you follow-up questions. But I need answers to my questions, and we'll get through this as -- in as long as it takes, but I just want you to focus on answering my questions. Okay?
A. I understand. As long as you understand that these officers were monsters; Craig, and Blackburn, and Nakai.
Q. I understand your testimony.
A. Thank you.
Q. So you mentioned that Officer Craig was -- appeared to you to be the more aggressive of the two officers when -- when they initially came in your home; is that right?
A. You said Craig, right?
Q. I did.
A. Yes.
Q. And did Officer Craig take ahold of you?

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A. He did. He eventually -- yes, he did.
Q. And where did he grab you?
A. You know, he grabbed my whole body as far as I'm concerned.
Q. Is -- is that your -- is that your best memory, that he grabbed your whole body?
A. Yes.
Q. Did you see the part of the body-cam footage that showed where his hands were holding onto your body?
A. So I know that he grabbed -- he grabbed more of my left side. It seemed to be my left side. He grabbed my left side.
Q. Okay. Was it your left arm?
A. It seemed to me that he came from behind. He came from behind me. From behind my back, and then eventually he got to my left arm. He -- yes. When -- so I'm -- so he went -- by the time Blackburn got there, and Blackburn was slowly walking in -- and Blackburn had gotten there, then he moved over, and took over -- Blackburn got to my right side, then he took over and got to my left side.
And this is the part that you don't see on the camera, on either of their cameras, is he is taking his boot -- Craig is taking his boot, and raking my leg. He's raking my leg. I still have bruises on my leg. On

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my leg. Permanent bruising.
Q. So Officer Craig --
A. And that's --
Q. Sorry. You have more?
A. I'm sorry. I couldn't hear you.
Q. Were you finished with your last answer?
A. I just want to make sure that you understand that you don't see everything on your body camera. And the other thing was, is that a lot of it -- those two were working very good --- well together. Blackburn was using his clipboard to block some of the body camera of his, and vice versa. They were doing a lot of blocking of cameras.
Q. That causes me to question, go back and -- and question. How much of the body cam did you look at?
A. I -- bits and pieces, if that makes sense. I didn't -- it was very hurtful. It was very harmful for me to look. I looked at it, but I could only look at it for one time. I can't look at it. It's -- it's very -- it's very evil. It's very sick. It's very -- everything you can think of. I know -- I cannot believe that these men can get away with this.
Q. All right. I'm going to --
A. I am harmless.
Q. I'm -- I'm going to ask you --

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A. They don't know who -- they don't know what kind of person I am.
Q. Janene, I -- I want to ask you again just to focus on the question. I had just asked you how much of the body cam you had looked at. That -- that's really all I was asking about right there.
A. I looked at it, but sometimes I had to look away so -- because it was so -- it was so disgusting to me to see that I was being treated this way. But I did see -- I did see a lot of it. I know -- I know that my legs weren't being videotaped. I know that they were not -- I know when I was watching it, they did not -- the camera did not catch my legs being raked when he was doing what he was doing. I know that he was harming my legs and they were not being recorded, what he was doing to me.
Q. All right. Did you look --
A. When I was trying to go down, he was not letting me go down. It was hurting me. He was not -- he was forcing me to stay up. I wanted to go down. He was not letting me go down because he did not want to see me go down. He was raking my leg.
Q. All right. And, Janene, I'm -- I'm going to -- I'm going to let you finish answering my questions; but, again, I want you to answer my questions, please.

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Did you watch the body-cam footage of both Officer Craig and Officer Blackburn?
A. You know, I watched -- I watched -- I watched video cam. I'm sure I watched both of them.
Q. All right. And did you watch them both start to finish, but you had to look away at times?
A. Let me tell you this. I have never been mistreated my whole life. My parents never did this to me.
MR. CHRISTOPHER THORPE: Janene, calm down.
MR. PEAT: Mike -- Michael, let's take a break real quick.
MR. FORD: Yeah, I -- I'm fine to do that.
MR. PEAT: Thanks.
VIDEOGRAPHER: Going off the record. The time is 10:10.
(A brief break was taken.)
VIDEOGRAPHER: We're back on the record. The time is 10:17.
Q. (BY MR. FORD) All right. Thank you. Continuing on understanding the contact between you and Officer Craig and Officer Blackburn. You mentioned that Officer Craig was holding your right arm and that he was raking your leg with his boot. Do you know which leg it was?

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A. Which boot he was -- no. So Craig was holding my -- Craig was holding my -- Craig was holding my left arm and I don't know which boot it was.
Q. Which of -- which of your legs was he raking?
A. Oh, I'm sorry. He was -- my -- my left leg.
Q. All right. And you said you still have bruising there, that it's on your left leg?
A. Correct. Yes.
Q. All right. And, then, Officer Blackburn, which arm did he hold?
A. Right.
Q. And he was holding his clipboard?
A. Yes.
Q. All right. And you indicated that you were trying to go to the ground and Officer Black -- or sorry, Officer Craig was holding you up so that you couldn't go to the ground; is that right?
A. Yes.
Q. Did the officers force you to the ground?
A. Were they forcing me?
Q. Yes. Did they force you to the ground?
A. No.
Q. Did they pull your hair?
A. Yes.
Q. When did they do that?

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A. Sometime during the -- during the confrontation that we were have -- the -- during the -- during the -- I don't know what you call it. During the struggle. During the time that they were --
Q. Okay.
A. -- doing what they were doing to me.
Q. All right. Was it -- was it while Officer Craig was raking your leg?
A. Probably.
Q. Did you look to see whether the body-cam footage showed any hair pulling?
A. You know, it's not like I went and looked for that.
Q. I understand. I just wonder if you saw that.
A. I felt it. I know.
Q. Understood. As -- do you remember as you watched the body cam if you saw it happen?
A. I probably saw it.
Q. During the course of the incident with the officers, did your head hit anything?
A. It did.
Q. What did it hit?
A. It hit the -- it hit something like his -- he had it jammed into his clipboard.
Q. You -- you believe your head hit Officer

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Blackburn's clipboard?
A. I know it hit his clipboard.
Q. Did you -- there -- there are degrees of -- of hitting something. Did you feel like your head hitting his clipboard caused injury to your head?
A. I know it caused injury to my head.
Q. What injury did it cause?
A. It caused injury to my neck and to my face.
Q. All right. And that was when Officer Blackburn had ahold of you on your right arm?
A. Correct.
Q. All right. What other contact do you recall between you and the officers?
A. I don't know what else you want me to say. They're grabbing me all over, pulling --
Q. Were they grabbing you all over?
A. -- my arms. He had a clipboard in my neck. Sticking the clipboard -- trying to basically kill me with that clipboard and dislocating my jaw. I mean -- and holding me up while, you know, I'm trying to -- I'm falling to the ground. I mean -- and holding me up like I'm a -- like I'm a rag doll. I mean, what do you want me to say?
Q. Just -- just every contact you recall between you and the officers.

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A. Well, you can imagine.
Q. I can, but I need your recollection. I need your memories and your testimony. You've described a lot of that. You just mentioned injury to your jaw. Did that occur with -- when the clipboard came in contact with your head?
A. Yes.
Q. Did you immediately --
A. I felt --
Q. -- feel pain in your jaw when that happened?
A. I had to go to the doctor. Yes. Had a dislocated jaw, yes.
Q. Did you feel, like, a pop in your jaw when it came in contact with the clipboard?
A. Oh, it was a lot more than that.
Q. Describe it for me.
A. It was an unbelievable pain.
Q. And the -- the --
A. You'll never understand the pain that these people put you through, that they put me through. And they are serving us.
Q. All right.
A. So I had pain in my jaw.
MR. PEAT: Listen for his question. Listen for his question.

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Q. (BY MR. FORD) Yep. I appreciate that. So you felt immediate pain in your jaw when the clipboard came in contact with your head; correct?
A. Yes.
Q. And it was intense pain?
A. Yes.
Q. Did the clipboard coming in contact with your head leave a mark on your head?
A. Not at first.
Q. How long after the incident did you have a mark on your head from where it came in contact with the clipboard?
A. I couldn't say.
Q. Did you take any pictures of the mark on your head?
A. The doctors did.
Q. The doctors took photos?
A. Yes.
Q. Which -- which doctors?
A. The -- the emergency doctors, the -- the -- the jaw doctor. Whoever was involved.
Q. Have you seen those photos that they took?
A. Yes.
Q. Do you have copies of them?
A. I'm sure I do. Yes.

Q. And I'm sure I have not seen those. Can you -- have you provided them to your attorney?
A. Yes.
MR. FORD: All right. I would ask for a -- a request for those photos, please.
Q. (BY MR. FORD) Did you take photos of where the boot raked your leg?
A. Yes.
Q. And where on your leg was it; on your thigh, on your lower leg? Where was it?
A. It was on my lower leg.
Q. On your shin, on your calf?
A. Shin.
Q. And you've taken photos of those?
A. Yes.
Q. Have you provided those to your attorney?
A. Yes.
Q. All right. I -- I haven't seen those either. I would make a request for those photos of -- of your shin.
And it was your left shin?
A. Yes.
Q. All right. I want to shift a little bit of our focus from when the -- the officers kind of released their hold on you and the situation de-escalated a bit.

Do you know what I'm talking about?
A. I'm not sure what you're talking about. So maybe you can...
Q. I will continue to try to explain. There was a -- a period of time while the officers were still in your home when they let go of you. Do you remember that?
A. Briefly.
Q. All right. And did you see that in the body cam?
A. Yes.
Q. All right. How were you feeling at that moment? Your -- your -- what part of your body was hurting the worst?
A. Everything.
Q. Was there not -- not a part of your body that hurt worse than the others?
A. I -- I think my whole body was hurting.
Q. All right. Was it to the point that you told the officers that they had hurt you?
A. I tried to, yes.
Q. What -- what do you remember saying?
A. I vaguely remember - and I don't know if they heard me - telling them that they really hurt me.
Q. Do you remember them responding at all to that?

A. I don't.
Q. The officers eventually did give you the paper that they had tried to have you sign?
A. You know, I don't know. I don't remember.
Q. All right. They continued to have a conversation with your husband in your home after the physical contact with you and -- and then on the doorstep. Do you recall that?
A. I remember we were walking to the door. And yes.
Q. All right.
A. Yes.
Q. And then eventually they left your home, your husband closed the door. Is that correct?
A. Yes.
Q. What did you do next?
A. My husband and I were trying to discuss what we should do because we felt very violated. I was hurt really bad. And we didn't know -- we never been treated -- we'd never been -- we didn't -- I don't know. There's no -- there's no words for this kind of behavior, for this kind of treatment.
MR. PEAT: Focus on his question.
Q. (BY MR. FORD) Yeah. Was -- was that what you and your husband discussed after the officers left?

A. Yes.
Q. Did you decide that you should document your injuries by taking pictures of the parts of your body that had been injured?
A. Yes, and go to the hospital.
Q. Do you remember what you did first? Did you take pictures first or did you go to the hospital first?
A. We -- I think we called our attorney, and then we went to the hospital. We talked to our son because he is a -- he's an RN, and then we decided, you know what, we're going to document as much as we can while we're talking to our attorney, and then we went to the -- to the emergency.
And when we were at the emergency, they wanted to know immediately what happened. And when we told them, they said, "We will make note to keep these officers from" -- American Fork, because they knew that these officers come in all the time bringing people in -- "We will make sure to keep them away from here. Even though we know that they're police officers, we'll keep them away" --
Q. All right.
A. -- "and we'll take care of you."
Q. Do you remember, did they -- did you take photos of your injuries before you went to the hospital

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or after you got home?
A. I think we took them both.
Q. Before --
A. We took them both.
Q. All right. I've got some photos that were produced and I want to take a look at those, so I'm going to put them on the screen. Are you in a position to be able to review the photos that I want to share with you?
A. That's fine.
Q. All right. So I -- I'm putting some photos on the screen. These are numbered at the bottom Plaintiffs 2 through 14. And do you recognize this first photo?
A. Yes.
Q. And what is that?
A. That's my arm.
Q. Is it your right arm?
A. Yes.
Q. And just -- just to see if we can narrow the time frame, do you know if this was taken before you went to the hospital or after?
A. I think that was -- I think that was before I went to the hospital. I'm not sure exactly.
Q. Was this photo taken in your home?
A. Yes.

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Q. And do you know whose -- whose phone it was that took the photo?
A. My husband, Chris.
Q. And do you know, is it still on his phone?
A. You know, I'm -- probably not.
Q. Okay.
A. I mean, it's been so long. I'm going to say it's probably not.
Q. Okay.
A. And those are scratches from -- or forget it. I'm sorry.
MR. PEAT: Yeah, wait for his question.
MR. FORD: No, yeah, you're fine.
THE WITNESS: Go ahead.
Q. (BY MR. FORD) I was actually just going to ask you that. It looks like, perhaps, this photo shows a scratch kind of on the underside of your arm; and I -- I wonder if you know if that came from the -- the metal clasp on the clipboard.
A. Yes.
Q. And there's also some -- some bruising forming on your arm. Is that correct?
A. Yes.
Q. Can you tell me, in the days that followed, did the bruising on your arm get worse?

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A. That's from that night.
Q. I -- I had assumed so. I just wondered if in the days that followed, if the bruising that you can see beginning there on the underside of your arm became worse, became more -- more visible.
A. Well, probably.
Q. All right.
A. It could have. I don't know.
Q. Okay. So you don't know if it got worse.
All right. It looks like the second photo, which is Plaintiff 3, is of the same part of your body; correct?
A. I'm sorry. What?
Q. This next photo numbered Plaintiffs' 3 is another photo of your same right arm; correct?
A. Yes.
Q. The next photo, Plaintiffs' 4, is that your other arm? Is that your left arm?
A. Yes.
Q. And there's some redness and bruising on the inside of your left arm, on -- in the bicep area?
A. Yes.
Q. All right. Plaintiffs' 5 looks like that might be your right arm again --
A. Yes.

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Q. -- with the scratching from the clipboard; correct?
A. Yes.
Q. And it also shows bruising there?
A. Yes.
Q. Plaintiffs' 6 looks like that's also your right arm; is that right?
A. Yes.
Q. All right. And these were taken the evening of the incident, either before you went to the hospital or after you returned home; is that right?
A. Yes.
Q. All right. The next photo, Plaintiffs' 7, this looks like a picture of your left arm from the back; is that right?
A. Yes.
Q. And it looks to me like this -- in this photo you're wearing a different shirt than you were wearing in the previous photo. Do you agree with that?
A. I do, yes.
Q. Do you remember when this photo was taken?
A. So -- I do. It was a couple days later.
Q. All right. It looks like it was -- are all these photos that we've looked at so far in your kitchen?
A. No.

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Q. Okay. Where -- where in your house are they?
A. I think one -- I think some -- most of them are in the kitchen, but they might be in my husband's office.
Q. Okay. A home office?
A. Yes.
Q. All right. When we get to one that looks like the home office, will you let me know? It looks like so far they all look like they're in your kitchen. Would you agree with that?
A. Okay.
Q. Would you agree that the photos, 2 through 7 --
A. Yes.
Q. -- all appear to be in --
A. They do.
Q. -- your kitchen? Okay. And Plaintiffs' 8, that's your left arm; correct?
A. Correct.
Q. And that was a couple days after the incident?
A. Uh-hmm. Yes.
Q. Okay. Plaintiffs' 9, that is your right arm?
A. Correct.
Q. It does look to me like, in this photo, the

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bruising had become worse. Would you agree with that?
A. Yes.
Q. I don't see much of the scratch anymore. Do you remember the scratch continuing to be a problem with your arm?
A. There was a scratch. I don't know where it is. Maybe it's on the other side.
Q. All right. Plaintiffs' 10, this is your right arm, the back side of -- of your upper arm. Is that right?
A. Uh-hmm. Yes.
Q. Plaintiffs' 11, this is your right arm on the inside of your upper arm; correct?
A. Yes.
Q. Plaintiffs' 12 is a photo of your right arm. It's extended over your head, and it shows the tricep area of your upper right arm. Is that right?
A. That's right.
Q. Okay. And Plaintiffs' 13 is a photo of your left leg on your thigh area; is that right?
A. Uh-hmm, right. Correct.
Q. And there's some bruising there?
A. Yes.
Q. And it looks like it's bruising on kind of your upper thigh area. Would you agree with that?

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A. Yeah. That's correct.
Q. All right. You mentioned raking your shin. That -- that's not this, is it?
A. No. He -- he -- he was kneeing -- he -- that's not that. But he was kneeing me. He was doing something to my whole leg. It's like he was kneeing me, and then he took his boot and -- there's other pictures.
Q. Okay. We'll -- we'll continue. But you think that -- that this photo of the bruising on your upper thigh was from Officer Craig's knee?
A. I don't know. He -- he was doing something to my leg.
Q. Okay. And then Plaintiffs' 14, it looks like you're in a hospital bed and there's bruising on your -- on your thigh; correct?
A. Uh-hmm.
Q. Is that "yes"?
A. Yes.
Q. And it looks like it's the same leg as in the previous photo, Plaintiffs' 13?
A. Yes.
Q. Do you know, this Plaintiffs' 14 that shows the bruising on your upper thigh, when that photo was taken?
A. I think that was -- I'm assuming that was the

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same night.
Q. The night of the incident?
A. Or two nights later. I'm not sure. You know, I had to go back to the hospital. I don't know.
Q. Okay. You don't know if this was the night of the incident or -- or the next time you went to the hospital?
A. I -- it's -- it's got to be that night.
Q. All right. I -- I'll just -- just in my experience from bruising, it often takes a day or two for bruising to really show up. I -- but all I know is what you're telling me, that your best -- your best knowledge is that this came from the night of the incident?
A. Well, then, I'm not sure.
Q. That's just fine. Do you know if you have, like, the digital copies of these photos that might have timestamps on them to know when exactly they were taken?
A. We probably have something.
Q. Okay. So I'll tell you, these are all the photos that I have of -- showing your injuries. I don't have any photos of your shin. Do you know how many photos you've seen of your shin?
A. I know it's pretty bad and we do have a photo of the shin.
Q. All right. And you mentioned that you've

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seen photos of your face, your head where it came in contact with the clipboard. Do you know how many photos you've seen of that?
A. I -- I don't know.
Q. Okay. All right.
A. All I know is that I had to go to a -- to -- I had to -- it took months -- months to go to get my jaw fixed. I had it -- it was dislocated.
Q. All right. So --
A. It's probably the most miserable thing to ever have done.
Q. Does that -- that kind of leads me to believe that maybe you don't recall seeing photos of your face or -- or do you?
A. Well, I mean, your face is not going to be disformed [sic], but it's painful. I mean, I don't know what you want.
Q. Only -- only your best memory. I thought you told me earlier that you had marks on your face and that you took photos.
A. I have -- I don't know. I have -- I'm going to have to -- I thought we had all the pictures here. I guess we don't.
Q. All right. We will mark that group of photos as Exhibit 6 to your deposition. So either before or

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after you took the photos, you went to the American Fork Hospital emergency room?
A. Yes.
Q. All right. And you indicated that you thought that the emergency room personnel took photos of you in the emergency room?
A. I could be wrong. But I -- I'm un -- I thought they did.
Q. All right. And you think they provided you copies of those?
A. I don't know if they provided me copies. I'm not sure. I was really out of it.
Q. All right. I -- do you remember, when you went to the emergency room, what -- what you complained to the doctors about your injuries?
A. I -- I just told them everything. I told them that, basically, I'd been beat up by the cops and that I was -- that my -- I needed to be looked at, checked out and...
Q. Do you remember telling them that your jaw was injured?
A. I believe so.
Q. Do you remember telling them that the officers had raked your shin?
A. I showed them everything. I -- at the time,

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I didn't know what it was called.
Q. Fair. But did you tell them that your shin was injured?
A. Yes. I told them everything. I showed them everything on my body.
Q. Okay. And that would have included your shin and your thigh?
A. Yeah. That's why I'm in a gown.
Q. All right. And I'm only asking that because you weren't sure if that photo of you in the gown was from the night of the incident or -- or later. Do you remember that testimony?
A. Repeat that.
Q. Yeah. I just thought you had said earlier that you didn't know if that photo of you in the gown was from the night of the incident or later.
A. No. That's why I was in the gown, because they were doing a -- checking me over --
Q. So --
A. -- from that night, from that night of the incident.
Q. So now, in talking about it, that last photo that we looked at of you in the hospital gown, that was taken in the ER the night of the incident?
A. Correct.

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Q. All right. And do you know, did that photo in Plaintiffs' 14 -- was that one that was taken by somebody in the hospital or by -- one of the doctors or nurses? Or was that taken by your husband?
A. I -- I don't know.
Q. All right. Well, I'll -- I'll tell you, the emergency room record reports that "This is a 52-year-old female who states that she was physically assaulted by a couple of police officers that barged into her home. She is complaining of having some scratches on her right upper extremity around the bicep and also contusions on the inner portions of both biceps and the right forearm. She states that they also pulled her hair and forced her to the ground. She does not believe she has any fractures, but is simply here for documentation of her injuries."
They don't mention any lower extremity -- any leg injuries. Do you recall telling them there at the ER on the night of the incident that you had leg injuries?
A. I don't remember.
Q. All right. But the gown shows -- or the photo shows you in a gown with a photo of your leg. So it would appear from the photo, if you're telling me that it was taken that initial visit to the ER, that they would have been aware of -- of bruising to your upper

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leg; correct?
A. Correct.
Q. It mentions that your hair was pulled and that you were forced to the ground. You had indicated to me that you were not forced to the ground. Is your testimony here accurate?
A. Well, they were -- I don't -- I'm not sure what you're trying to get at.
Q. Only wondering if you told them you were forced to the ground and if, in fact, you were forced to the ground.
A. I don't think I ever told them that. I think that's a misunderstanding.
Q. Okay. You think they reported that incorrectly?
A. I think they reported that incorrectly, because I don't think I told them that.
Q. All right. And would that be the same for the lower leg injury? You told them that your leg was injured, but that they didn't report that would be misreported on their part?
A. You know, I don't know. I'm not sure.
Q. All right. But you do remember that you told them that your leg was injured?
A. I did tell them my leg was injured and you

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can see that my leg was injured.
Q. Did you tell them that your jaw was injured?
A. I did tell them my jaw was injured.
Q. And if they didn't put that in your record, that would be an error on their part. Is that right?
A. I don't know what to say.
Q. Okay. It reports that "Patient does not feel like anything is broken." Did you feel like your jaw was broken?
A. I felt like there was something wrong with it.
Q. I'm just wondering if -- if this statement, "Patient does not feel like anything is broken," is that something you told them or is that another mistake that they made?
A. I think that's their opinion.
Q. I will just tell you that the record says that "Patient does not feel like anything is broken." Is that something you conveyed to them?
A. I didn't convey --- I don't think I said anything like that. I was really out of it when I came in.
Q. Do you remember them asking you, "Do you think anything is broken?"
A. I think -- I don't think. I -- they went

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over me and did, like, a touch/feel test over me.
Q. Okay. But do you remember them asking, "Do you feel like anything is broken?"
A. No.
Q. It also states, "She did not hit her head." Would that be accurate?
A. I guess.
Q. You said earlier to me that -- that you did hit your head on the clipboard; correct?
A. I did.
Q. And it dislocated your jaw?
A. Sorry. Go ahead.
Q. And it dislocated your jaw?
A. Well, they pushed the clipboard into my head, yes.
Q. All right. So, do you know? Did you tell the emergency room personnel that you did not hit your head?
A. I didn't get to talk to anybody that much when I was there.
Q. So you don't remember telling them one way or another?
A. I don't.
Q. All right. The -- the record continues, "She states that she did have her hair pulled, but there is no

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signs of hematoma or anything concerning on the physical exam of her scalp." Do you remember them examining your scalp for injury from hair pulling?
A. I don't remember that.
Q. Do you remember that your head hurt from where they pulled your hair?
A. I do.
Q. And do you happen to remember if there was any bruising on your scalp from where they pulled your hair?
A. I don't.
Q. Okay. It goes on to say, "She does have multiple contusions as documented in the physical exam," which would have been on both your right and left upper extremity around your biceps. But they don't mention anything about your legs. Do you remember them actually looking at your legs?
A. Can you repeat that? You were getting cut off.
Q. Sure. It says in here that they did note the contusions on both of your upper arms. And it said that was consistent with the physical exam. Do you remember them doing any physical exam of your legs?
A. I don't.
Q. Do you remember telling them, "They hurt my

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leg," and that they then didn't look at your leg?
A. I don't remember.
Q. All right. It says, "There's no indication at this time to do any imaging." You did mention to them that your jaw was injured and that you were having a lot of pain in your jaw; is that right?
A. Uh-hmm. Correct.
Q. But -- but do you remember having the discussion, they weren't going to do any imaging on your jaw?
A. They said they couldn't do any imaging because it was of the time of night and their imaging thing -- their imaging -- their imaging scan wasn't open. They are a smaller facility, American Fork; and they weren't open -- they -- they didn't have somebody that could run it.
Q. So it's your recollection of your interaction with them that they didn't say that no imaging was indicated. It was that "We can't because the imaging department is closed"; is that right?
A. I guess so.
Q. So they then discharged you home?
A. So they also said to -- to be prepared that you will probably have -- "You probably had a concussion from them battering you up." And they said, "Just be

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prepared, watch out for these certain signs." And they did discharge me to come -- to go home.
Q. I'll -- I'll tell you that there's no indication in the note about anything about a concussion. But that's something that they told you anyway, is you should be aware of signs of concussion?
A. Yes.
Q. They do note in the record that you did not hit your head. Did they give you any explanation of why you should expect a concussion with no -- with no contact with -- or no hitting of your head?
A. For the fact that just being shaken and the -- the -- the trauma of the two men coming in and doing what they were doing was enough to cause enough trauma to me. And then shoving of the clipboard into my neck, they said just be prepared to have these things happen. And...
Q. That's what the ER doctors told you?
A. That that could happen. What?
Q. That's what the ER doctors told you?
A. Yes.
Q. All right. What was hurting the worst while you were there in the ER?
A. Everything. My legs, my arms. I mean, the trauma of everything.

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Q. Did your arms hurt as bad as your leg and as bad as your jaw?
A. Probably my jaw, my neck, my head from having that clipboard shoved into my neck, the headache of all that pressure; and, then, probably the legs. The leg from the raking of what he did to me, that was very, very painful.
Q. So in kind of the order of things what was hurting the worst, it sounds like your head, neck, jaw hurt the worst. And then next would be your leg, and then maybe next would be your arms?
A. Correct.
Q. And the -- that is what you reported to the people in the ER?
A. Yes.
Q. Do you have an understanding of why the only thing they mention in their ER record is injury to your arms?
A. I don't.
Q. All right. Do you remember when is the next time you got medical treatment?
A. Two days later.
Q. Do you remember who that was with?
A. ER.
Q. Was it at the same ER or was it a different

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ER?
A. The same.
Q. And what -- what did you report that next visit to the ER?
A. That it was my head. That I was -- well, I was really sick. I was feeling -- I was throwing up and not understanding what was going on. Feeling very unstable, throwing up, and not knowing what was going on. Just not feeling really great, and had to go to the ER. And they said, "Yeah, you're" -- "you're suffering from a concuss" -- well, they asked me what happened. And then they realized that I had just been in there because they could see, and they said, "Yeah, you're suffering from a concussion that just happened." And --
Q. I'll tell you, I don't have a record from the ER for a couple days following the accident. The next record I have is the 27th of April, which is four days later, at Revere Health with Dr. Justin Jones, and it says ER follow-up. Do you recall that there was a second ER visit between the initial one and your visit with Dr. Jones at Revere Health?
A. I believe so. I -- I -- I -- you know, I -- this has been a long time, and I -- I -- so you're saying -- when were you saying that the ER follow-up -- or when were you saying the next time I went to the ER?

Q. The next time I see in the ER is not -- well, the next one I have at the ER is April 28th and you had a CT scan at that point. But you had an intervening visit with Dr. Jones at Revere Health on the 27th of April.

A. Okay.

Q. And, you know, records can be wrong. And so I just -- I want to know your best memory of things. I just wanted to let you know that I don't have an ER rec -- record from the -- a couple days following the incident where they talked about a concussion. But you recall that that happened?

A. I -- you know, it's been a long time, and maybe I'm wrong.

Q. Well, not -- not a problem. Do you remember going to a Dr. Jones at Revere Health on the 27th of April for an ER follow-up?

A. I thought I went to an ER follow-up.

Q. Okay. And did you know Dr. Jones, or is that a -- a clinic at Revere Health where you just see whoever's there?

A. We did have a Dr. Jones, but I don't see a Dr. Jones anymore. I don't -- I don't -- I don't -- it's been a long time.

Q. Okay. So that follow-up visit with Dr. Jones at Revere Health is where there is mention of jaw pain

being the most bothersome and really the first mention of -- of jaw pain in the medical records from the incident. And I just wanted to, again, test your memory. You're sure you told the ER the night of the incident that your jaw was hurting?

A. I did. And the issue with jaw pain is that you have to find the right doctor.

Q. Okay. Did you -- do you remember believing that the ER doctor was the right doctor to tell about your jaw pain?

A. I guess not.

Q. They took an X-ray of your TMJ at Revere Health on the 27th of April. Do you remember discussing the X-ray results with your doctor there a couple days after the -- the incident?

A. Who's the doctor?

Q. It would have been this Dr. Jones at Revere Health.

A. And what were the results? I don't -- you'd have to give me more information on that.

Q. Okay. Do you remember them doing an X-ray on your jaw?

A. What were the -- do you -- do -- can you give me more detail on that? Because, honestly --

Q. I'll -- I'll just tell you, right now I just

want your memory. If you don't remember it, that's totally fine. If you do remember it, I want to know your memory.

A. I do not remember getting any X-rays with him. I -- that's all.

Q. Okay. Do you remember some point in the future getting X-rays on your jaw and discussing the results with your doctor?

A. With which doctor?

Q. Any doctor. Do you remember that?

A. I do.

Q. When?

A. What do you mean "when"?

Q. When -- when did you have that discussion with the doctor that you can remember?

A. About my -- about what?

Q. About your jaw.

A. I do.

Q. Tell me about it. When did that discussion happen?

A. You have to find the right doctor and then -- and that took a lot -- that took some time and we just had to find the right doctor.

MR. PEAT: Okay. Listen to his question.

Q. (BY MR. FORD) Yeah. Do -- do you remember

when it happened that you had a discussion with your doctor about X-ray results on your jaw?

A. So maybe at the end of April.

Q. All right. So that's -- that's around the timeframe of this record, is April 27th, 2021, at Revere Health. There was an X-ray of your jaw. What do you remember about the discussion you had with the doctor about the X-ray of your jaw?

A. He looked at it and said that it needed to be -- needed to be taken care of.

Q. I will tell you that -- that the X-ray results that I have from this visit says, "I find no evidence for a fracture or dislocation for the views of" -- "of TMJ." Do you remember having a discussion where they found no evidence of fracture or dislocation of your jaw?

A. Which doctor is this?

Q. His name is Dr. Justin Jones at Revere Health, and it's April 27th, 2001 [sic].

A. And I do not remember him doing an -- an X-ray or -- was it an X-ray, you said?

Q. Correct.

A. Yeah, I don't remember this.

Q. Okay.

MR. PEAT: Michael, can we take a break?

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MR. FORD: I think it would be a good time to do that.
MR. PEAT: Thank you.
MR. FORD: Yep. I'm going to take a quick bathroom break, so we'll take a few minutes.
VIDEOGRAPHER: We're off the record. The time is 11:17.
(A brief break was taken.)
VIDEOGRAPHER: We're back on the record. The time is 11:31. Counsel, proceed.
Q. (BY MR. FORD) Thank you. Thanks for the break. I was needing one.
So the next record I have -- and I'll just tell you, we're not going to go through every record like this. These are just the -- the handful of initial records that I want to review with you before you really started into treatment for various conditions.
I do see a return visit to the ER on April 28th, 2021, which was after that visit to Revere Health where there was X-rays taken of your jaw. And it says in this emergency room visit, April 28th, that you returned to the ER -- the emergency department because of "headache, nausea, dry heaving throughout the day today." The -- the record says, "Context: This occurs in a patient who was seen late on the night last Friday into

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Saturday, April 24, after an alleged assault."
This leads me to believe that perhaps this was the next visit to the ER on the 28th. Could that be -- could that be accurate, to your memory?
A. Yes. That's probably more accurate, yes.
Q. All right. It says in this report, "She and her husband," who are -- "who both give history," state -- "states that they were assaulted by armed assailants at the front door of their home. Apparently there are some other details about this incident, but they, at this time, do not want to share. She complains of having bruising to her arm, had her hair pulled, kneed in the thigh and possibly kicked. She does not think she lost consciousness. She felt like she was starting to get better, but this morning after awakening noted developing those symptoms that are indicated above."
Does that ring a bell? Do you remember that visit and making that report?
A. Yes, that sounds right.
Q. All right. Do you remember them doing anything for you at that time?
A. I don't remember.
Q. All right. I think just to be sure, during that visit they did do a -- a brain and head CT scan. Do you remember them finding that there were no head

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injuries, no -- no skull injuries, brain injuries at that time that were shown on the CT scan?
A. I don't remember.
Q. Okay. I see another visit to Revere Health on May 12th - so a couple weeks later - and they did an MRI of the TMJ. Do you remember having done that?
A. I don't.
Q. I'll tell you there was -- in that MRI, they did find a dislocation of the TMJ. And then it looks like on May 20th, 2021, you went to TMJ therapy for your first visit. Do you remember doing that?
A. I don't remember, but it sounds like it could possibly be.
Q. All right. It looks like you met with Ryan Hart. Do you remember that being the person who treated you for your TMJ?
A. Yes.
Q. What do you remember him telling you about your TMJ injury and what could be done to help it?
A. You know, it's -- it was pretty long and I am not a doctor, and it would be too -- it was a lot.
Q. I understand. And I just want to know if you remembered what he told you at that initial visit about what you could expect for treatment.
A. Like I said, it was a lot. I -- I couldn't

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go into it.
Q. Okay. Did he give you an appliance to wear?
A. He had to make one, yes.
Q. Okay. And how long did you wear that?
A. A long time.
Q. Any estimate on how long?
A. Months, a year.
Q. Would they occasionally have to adjust it and fit you for a new device?
A. Yes.
Q. Do you remember how many times they did that?
A. Maybe weekly, monthly.
Q. And how often did you wear the device?
A. Oh, every day.
Q. And it was constant? You couldn't take it out except to maybe brush your teeth?
A. Correct.
Q. And help me understand what it was. Was it, like, something that would go over your teeth? Help me to --
A. Yes.
Q. -- understand it. And was it something that you'd wear and that you would keep your mouth closed while you wore it?
A. Yes.

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Q. And it fit over both your upper teeth and lower teeth?
A. Yes.
Q. Okay. Was it uncomfortable to wear?
A. Yes.
Q. Did it make sleeping difficult to wear it while you slept?
A. Yes.
Q. Did your TMJ issue resolve?
A. No.
Q. Why did you stop wearing the device?
A. There's only so much they can do for you.
Q. Is that what they told you, "We've done all we can. You're going to have to deal with whatever you're still left with"?
A. Basically, you -- you do so much, and they can only do so much for you.
Q. All right. And what I was really interested in is, is what they told you. Or did you just decide, "I'm not getting better. I'm done"?
A. No. That's what they tell you.
Q. Okay. And that was after, maybe, up to a year of -- of working with them on that?
A. Several years.
Q. I -- I was wondering how -- how much

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treatment before they told you, "This is all we can do"?
A. Like I said, several years.
Q. So you treated with them for several years?
A. Yes.
Q. Okay. I thought initially you said that you treated with them for several months or maybe up to a year.
A. No. I had the appliance. You asked if I was having the appliance.
Q. Okay. My misunderstanding. So you wore an appliance for several months, maybe up to a year, and then you continued to have additional treatment with them?
A. You have the appliance change -- it's very hard for me to explain. You have the appliance. You go in every week, then every month, and you have the appliance adjusted so that it can fit -- so that it can help your jaw. And you do this for a whole year. And you also have to do exercises. It's like a broken arm. Your never -- your broken arm is never going to be back to normal. And this is worse than a broken arm. It's your jaw.
Q. I just want to understand the treatment that you received.
A. Yes.

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Q. So --
A. That's the treatment, yes.
Q. -- several months, up to a year, of wearing a device and having it adjusted.
A. Right, a year. And then doing exercises and doing all that and continuously doing the exercises. And now you're off on your own. I mean, I'm just trying to explain. Yeah, then you're off on your own and you just -- you know, you just do your best after that. If that -- does that make sense?
Q. I'm just wondering what additional treatment you got after the up to a year of adjusting the -- the appliance, giving you the -- the exercises. What additional treatment was there after that?
A. You do the exercises, the jaw exercises. The exercises that you're supposed to do.
Q. And was that something you do on your own, or would you go in to them to have you do the exercise?
A. Yeah, well -- yeah. You go in. You -- you do them on your own, and...
Q. All right. So you -- you had indicated that there were years of -- of treatments that you received, and I was wondering what treatments you received after a year of the fittings and adjustments and exercises. Then what additional treatments following that did you

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receive?
A. Just having the appliance adjusted and -- and going in and having it -- make sure it's fitting correctly and making sure that I'm doing the jaw therapy, and like so.
Q. And you continued to receive those after a year?
A. Correct.
Q. All right. When was the last time you had a treatment for TMJ?
A. Probably a year ago.
Q. Do you still wear the device?
A. I -- I haven't in -- yes.
Q. You're wearing it right now?
A. No.
Q. Sorry. When you said -- I thought you said, "I had it in."
A. No, no. I don't have it in.
Q. Okay. Okay. How often do you wear it now?
A. I really don't need to wear it. I can -- I'm free of the -- of the appliance. I can just do the exercises and just try to keep my mouth -- it's kind of, like, exercises, if that makes sense. Just kind of keep my mouth -- keep it -- sorry. I'm lost for words for this.

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Q. That's fine. That's fine.
THE WITNESS: Norman, can you help me?
MR. FORD: That's fine.
THE WITNESS: I'm sorry. I'm lost for words, for the words to use for exercising my mouth. You just have to keep it exercised, moving, and things like that. Like, you just have to keep it going. And it's not just, like, talking and chewing and things like that you would normally do. It's something that you wouldn't normally think of. It's something I have to do because of my -- of my jaw dislocation.
MR. FORD: Okay.
THE WITNESS: And it's something that people like me who had their jaw dislocated would have to do. Because if I don't, it gets stiff. And when -- it's just -- it's just -- it's -- it's just something I have to do.
MR. FORD: All right. I appreciate that and I understand.
THE WITNESS: I have to do my exercises, yeah.
Q. (BY MR. FORD) All right. So when did you stop wearing the appliance? How long was it after the incident that you no longer needed to wear the appliance?
A. So it's probably about -- about two years.
Q. Okay. I appreciate that. It looks like

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June 7th, 2021, you went to Utah Neurological Clinic. Do you remember going there following the incident?
A. June 7th, 2021?
Q. Right.
A. I -- I do not remember.
Q. And that's just fine. I wasn't asking you about this particular visit. Just after the incident, you went and treated at Utah Neurological Clinic.
A. Oh, so it was June 7th, 2021, and -- and do you -- is it -- well, I see -- I see a lot of doctors for neurology. So, I'm going to say I don't remember.
Q. And that's just fine. I -- I didn't want to know if you remembered that June 7th visit, just if you remembered going to that facility, Utah Neurological Clinic, at some point following the incident.
A. Okay.
Q. And that's -- that's a treatment provider that you're familiar with?
A. Probably.
Q. I think that's one that actually you had seen prior to the incident in connection with the brain tumor. Are you aware of that?
A. Yes. I mean, I -- I'm assuming. I don't --
Q. That's -- if you don't remember something, let me know that because it -- that's not a wrong answer

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to tell me you don't remember something.
A. I don't know.
Q. Okay.
A. I'm just going to say that. Not sure.
Q. And that's just fine. All right. In -- in this visit to Utah Neurological Clinic, it says, "Patient was attacked back in April. She had an intruder come into her home and was physically attacked, and they pulled her hair and yanked her head back so hard and her son and husband was in the house also. Her husband was trying to get in between the intruder and her, and he thinks she hit her head on the walls and the furniture in the house.
"She was seen in the ER after the attack. She is struggling with nausea and has a medication to help with that and has been taking that and that is now starting to not help as much. She has been kind of out of it. She thinks she may have a concussion from the attack. She described her memory as kind of a blur and being woken up and not awake all the way. She has a dislocated jaw from the attack and has had extreme pain all over her body. She has increased headaches, earaches, and with a brain tumor is very concerned."
Do you remember reporting that to Utah Neurological Clinic at some point following the incident?

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A. You know, I really don't.
Q. All right. Do you know if this would have been the first time that there was any discussion of the possibility of you having a concussion?
A. I don't.
Q. All right. It looks like by June 17th, 2021, you began getting some concussion follow-up treatment from Utah Neurological Clinic. Do you recall getting treatment for concussion symptoms at Utah Neurological Clinic?
A. I don't remember.
Q. All right. This says, at this June 17th visit, "She has had a brain tumor and has been doing well. We saw her in March. Unfortunately, just recently, she was assaulted at her front door and into her home by the police," she states, and has a dislocated jaw. They are going to keep her in a brace for four months and if it does not help, then maybe surgery. They grabbed her hair, she states, and they tore her head down.
"She" had -- "has had dizziness, nausea, concentration problems, vision problems. It sounds like she has had a good concussion. She still has a lot of neck pain on that right side and shoulder pain where she cannot even elevate her shoulder."

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Do you remember in the incident that they grabbed your hair and pulled your head down to the point that it caused concussion symptoms?
A. I do.
Q. And do you happen to know if that is depicted in the body-cam footage?
A. I don't know.
Q. That wasn't something that you saw?
A. I -- I don't know.
Q. Okay. But anyway, that's something you remember was that they grabbed your hair and pulled your head down with such force that it caused you to have concussion symptoms?
A. Yes.
Q. All right. On -- on June 17th, the same day as Utah Neurological Clinic, there's also a visit back to Revere Health with Dr. Jones. And it says here, "The patient states she was assaulted by two men and sustained injuries to her left shin and sustained significant bruising. X-rays of her leg were negative." Do you recall going in mid June and reporting injury to your shin at Revere Health?
A. I don't remember.
Q. You mentioned that you still have permanent bruising on your leg. Do you have bruising on your shin?

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A. I do.
Q. And on your thigh?
A. Not sure about my thigh because it's not something I look at, but my shin because it's right there. And it really bothers me. I know it shouldn't. I'm sorry. But it's right there, and you can see the -- from his boot, from his -- I'm -- I'm sorry. His shoe, boot. You can see -- you can see it on my -- on my -- on my shin. You can see his boot mark on my leg -- on my -- on my shin.
Q. All right.
A. It just -- it just irritates me. It's -- it's disgusting.
Q. You mentioned that you believe you have --
A. I didn't --
MR. PEAT: Let him -- let him ask his question.
Q. (BY MR. FORD) You mentioned that you believe you have photos showing the bruising on your shin immediately after the incident. Do you have any more recent photos showing permanent bruising on your shin?
A. I'm sure I do, and I can actually just show it to you.
Q. Would you have a problem with that? I -- I would be interested to see.

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If you don't want to do that, then I don't have any -- I'm not going to press you on that. I thought you were volunteering that.
A. No, I have no problem pulling -- showing you, seriously.
Q. Okay.
A. I have no problem showing anybody these -- this mark.
MR. CHRISTOPHER THORPE: We better get a picture and documentation.
THE WITNESS: Seriously.
MR. PEAT: Michael, I -- we -- we can get recent photos. I -- I'm not quite sure how well that would show up on -- on the camera, but --
MR. FORD: I'm not sure either, but...
MR. PEAT: -- we'll go through everything and make sure that -- that all these photos that we have -- and get recent photos of the shin, if that will satisfy the question.
MR. FORD: That certainly does. Thank you.
MR. PEAT: Of course.
Q. (BY MR. FORD) All right. I have several visits in June with a place called "Neural Effects." Do you know what that facility is?
A. I -- I -- I -- I kind of do, but maybe you

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can give me an idea. I -- if you can maybe --
Q. Sure.
A. -- jog my memory.
Q. I'd be happy to.
A. Okay.
Q. It looks like perhaps you received some type of postconcussion therapies there. Does that sound familiar?
A. Do you know what city they're in?
Q. From my notes, I don't know.
A. Okay.
Q. Do you remember going to multiple places for concussion symptoms following the incident?
A. And this is in June?
Q. That was the first visit. It was June 21st, and then there're several thereafter.
A. Yeah, yes. There were -- there were -- yes, there were several. I don't want to give you wrong information, so I'm going to say I'm not going to be able to give you --
Q. That's totally fine. I was only wondering if you had remembered getting treatments there.
A. They sound familiar, but I don't want to give you inaccurate information on them.
Q. Okay. All right. Do you -- do you happen to

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remember how long you had concussion therapy sessions following the incident?
A. I don't.
Q. Other than your TMJ and the postconcussion therapies, do you remember having other treatments for other parts of your body relating to injuries in the -- in the incident?
A. Yes. I had to go for a foot issue as well. Yes.
Q. What do you remember about that?
A. Yeah. I just vaguely remember -- Craig was horrible.
Q. So what -- what kind of treatments did you get for your foot?
A. I -- I -- I can't remember exactly, but I had to go in for -- to have my foot analyzed. He -- I can't --
MR. PEAT: Focus on the question.
THE WITNESS: Yeah, I know. I just had to go to a foot doctor.
MR. FORD: Okay.
THE WITNESS: And I can't remember everything.
Q. (BY MR. FORD) Did they put you in a boot?
A. I -- I -- they put me in something and I

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can't remember exactly.
Q. Do you remember how long you wore that, whatever it was?
A. It was either a special shoe or a boot -- boot or something. I -- I can't remember. I -- I -- I can't remember.
Q. And you don't remember how long you had to be in it?
A. I can't.
Q. Any other treatments you remember receiving for other injuries you sustained?
A. I -- I can't. I -- I'm not sure. I just can't remember right now. You can ask my husband.
Q. Okay. I'm going to kind of shift away from specific treatments related to the incident. I want to talk for a moment about preexisting issues, and about your brain tumor and related issues. It's my understanding that you were awarded social security disability; is that right?
A. Okay. Can -- I need to have a break for a minute.
MR. FORD: Yeah.
THE WITNESS: I really need a break.
VIDEOGRAPHER: We're off the record. The time is 12:01.

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(A brief break taken.)
VIDEOGRAPHER: We're back on the record. The time is 12:14. Counsel, proceed.
MR. FORD: Okay. Thank you.
Q. (BY MR. FORD) After a short break, we're back. I wanted to ask you about social security disability determination. Are you aware of the determination that was made in a case for disability that you made?
A. I am to some degree. I -- you can ask me, and I'll try to answer your question.
Q. All right. I appreciate it. So --
A. Yes.
Q. -- the determination that I have is dated September 13, 2023. Is that your understanding of that's when you received your social security disability?
A. Yes.
Q. All right. And is it your understanding that the Social Security Administration determined that you are disabled, for their purposes, because there are not any jobs that you're able to perform?
A. I think that's correct.
Q. All right. And do you know if their determination was based on events that happened since the last date that you were employed, which according to this

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was February 1, 2017?
A. I believe so.
Q. And it -- it goes through and lists a number of events that happened from that date forward. I think that February 1, 2017, was when you slipped and fell in a parking lot and got a concussion. Is that correct?
A. Yes.
Q. And then it was in the treatment that you received following that was when they found the brain tumor; is that right?
A. Correct. Yes.
Q. And then they did surgery on that tumor in May 2018.
A. Yes.
Q. All right. And is it your understanding that your seizure disorder manifested itself sometime after that slip-and-fall accident as well?
A. Yes.
Q. And was it actually related to the surgery, do you know? Or to the tumor, or either or neither?
A. I think it was to both.
Q. Okay. All right. Both having the tumor and then having the surgery to -- to remove it?
A. Correct. I think to both. That's what I think.

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Q. Okay.
A. But I -- I'm not a doctor, so...
Q. Totally understand. There was some indication that there's a possibility you may even need a future surgery for this tumor. Is that your understanding?
A. Yes.
Q. Do you receive ongoing treatments to monitor and treat the -- the tumor?
A. Yes, I do.
Q. And who do you receive that treatment with?
A. So I'm receiving that treatment -- like, the doctor you mean? Like a --
Q. Correct.
A. Kind of, like, who I'm seeing to keep up with that?
Q. Exactly.
A. Dr. Langford right now.
Q. Okay. And is he with Revere?
A. You know, I am sorry. I don't like all these different names. I -- I can't say if he is or not.
Q. No problem. No problem. Some of the things that this disability finding conclude is that you're not able to drive. You are aware that that was a finding that they made?

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A. Yes.
Q. And that you've got impairments that cause difficulty with concentration and lack of ability to -- to remember things?
A. That's what they say. Again, I'm not a doctor. I -- that's what they say.
Q. Okay. It says that you also have balance problems. Is that accurate?
A. You know, I don't believe that is accurate because I'm not -- when I think of balance, I'm thinking of a fall risk. But maybe that's two different things, so...
Q. Well, and I --
A. I --
Q. Yeah. Go ahead and finish.
A. So, like, again, I -- I -- I don't know what to say because, again, I keep on thinking a doctor issue. I don't know what to say. I've never had a -- really a balance problem or a fall-risk problem. So I don't really take it as that.
Q. Okay. I -- I appreciate that. I was curious because one of things that it says in this report is that "Claimant cannot work as she uses a walker and has balance problems." But that's not accurate?
A. Well, I was on a walker.

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Q. Okay. During that time period of 2017 to 2023?
A. Unfortunately.
Q. Okay.
A. So I don't know what to say. Yeah. I had a hard time, yeah.
Q. All right. And it says that you had had several falls and slip on ice that were related to these balance issues.
A. Well, that's at the beginning when I had -- when I had the -- when I first got diagnosed with the -- with the tumor.
Q. Okay. All right. It talks about you getting ongoing treatment for a closed head injury, which included treatment for anxiety and depression. Is that still the case?
A. So there are two different things and, again, I'm not a doctor. I don't really feel like I have depression, but I do get anxiety.
Q. Okay. And do you treat that?
A. For that -- go ahead. I'm sorry.
Q. I -- I was asking, do you get treatment for anxiety?
A. I -- I don't really. The doctors feel like it's under control. And they just tell me to come in and

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see them as needed.
Q. All right. How often do you do that?
A. Maybe once a year just to do a regular health follow-up.
Q. And when's the last time that you did one of those follow-ups?
A. Oh, gosh. The end of last year.
Q. Like, late 2024?
A. You know, I don't want to be inaccurate. Last year was very busy. It -- last year, it could have been in the middle of the year. So I can't be for certain. Last year was super, super busy for us. So I want to say maybe it was, like, last year. It could have been -- and I -- I -- it could have been anytime. I just can't keep up with everything last year. We had a very busy year.
Q. Okay. No worries. Do you take any medication for anxiety?
A. Actually, I'm not.
Q. Have you in the past?
A. I was only -- they only give it to me, like, as maybe to -- after I come home maybe to -- after I've had, like a -- actually, they don't give it to me. I'm sorry. They -- they haven't given -- they haven't given me anything for anxiety.

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Q. Oh, okay.
A. And they'll only give it to me, like, when I'm in the hospital; but they don't feel like I need it coming home. They feel like I'm pretty well fine coming home.
Q. All right. So help me understand that a little bit. Have you ever been hospitalized for anxiety?
A. No. No. But, like, surgeries.
Q. Okay. That's what I wondered. You go in for something that may be stressful, so they'll give you some anxiety medication while you're there for that unrelated medical procedure?
A. Yeah. And I really don't know why they give it to me. They just -- it's protocol, maybe.
Q. Okay. All right. Maybe it would be useful -- it wouldn't be very useful to me, but it may be useful right now. Can you list for me the prescription medications that you currently have?
A. Like, that I'm taking?
Q. Right.
A. You know, I -- I really can't. I would -- I'm not taking very much, but I -- I'm not good with the names.
Q. All right. All right. Can you tell me generally what you take them for?

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A. I take them for -- I take them for seizures and to keep up so that I don't have an issue. And I take two kinds of zonis -- Zonisamide and -- actually, I take three kinds of meds for -- for seizures. And then I take another one -- I take another important med for something else. And I -- I just can't -- and that's probably about it.
Q. Okay. Thanks for your help with that. You mentioned that you go in for some sort of treatment as needed for anxiety. Do you get any other type of counseling?
A. Can you repeat that? I'm not sure I understand what you're saying.
Q. Yeah. You mentioned that you get anxiety treatments kind of as needed and that maybe it's every year just as a checkup. Do you receive any other type of therapy, like counseling?
A. So, I'm kind of confused what you're -- what you're saying. I...
MR. PEAT: Just ask him to rephrase the question.
THE WITNESS: Yeah. Can you rephrase the question, I guess?
Q. (BY MR. FORD) Sure. I just wonder if you receive counseling.

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A. Oh. So, yes. Yes, I was receiving counseling.
Q. And who is that with?
A. With a therapist by the name of -- I can't think of her last name. Her last -- her first name was Carol. And --
Q. Carol?
A. I'm sorry --
Q. Carol Tanner?
A. -- to put this on you. Ask my husband. He will be better at this than I will. And we were -- he was coming with me. Obviously, we do a lot together because I can't drive. So we were doing this -- we were doing this counseling, this therapy together and -- because we -- going through it together. And so --
Q. Is it -- sorry.
A. -- you could ask him. He'll probably have a better memory than I do of her last name.
Q. Is it Tanner?
A. What?
Q. Is it Tanner?
A. Correct. Yes.
Q. Carol Tanner?
A. Yes.
Q. And do you remember for what period of time

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you went and saw Carol Tanner?
A. I want to say we saw her for about -- I want to say we saw her about six months. Maybe eight months.
Q. And when did you first begin treating with her?
A. I want to say June.
Q. Had you -- have you counseled with Carol Tanner for issues unrelated to this incident?
A. Like, as a doctor or, like, a nurse before?
Q. Just as a counselor, the same kind of treatment following the incident.
A. No. I mean, just what she was.
Q. What I'm wondering is if -- did you see her exclusively for treatment following the incident with the American Fork police officers, or did you counsel with her over other issues that are apart from that?
A. We kind of did it -- I think it was just maybe general everything.
Q. She is mentioned in the social security disability findings, that you treated with her and -- and they actually relied on some of the information that she provided in your social security disability determination. But I will just represent to you, I'll tell you, she does talk about providing you therapy. She talks about dealing with problems with

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your neighbors, but she does not mention at all the incident involving the American Fork Police Department. And I'm wondering to what extent was the counseling you received related to that incident with the police as opposed to other issues.

A. I believe we talked to her a little bit about everything. Like, generally a little of everything.

Q. In -- including the incident with the police?

A. I -- you know, I -- I thought -- I mean, I could be wrong. I don't know.

Q. Okay. You believe so, but perhaps not certain about that?

A. I'm sorry. You got cut off a little bit.

Q. Okay. I said you -- you believe that you spoke to her about the police incident, but you're not certain?

A. You know, I thought we talked to her about a little bit of everything.

Q. Okay. I'm hoping you can help me understand how you are currently doing as far as it relates to the incident with the police. How are you still dealing with the issues that arose from that incident?

A. Can you maybe rephrase that?

Q. Yeah.

A. I'm not sure I'm understanding you the way I

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think you're saying it. I just want to make sure I'm understanding the way you want me to understand it.

Q. I appreciate that, and I'm happy to. This is kind of an intentionally open-ended question. It -- it has been apparent to me over the course of the deposition that the interaction with the police that night in April 2021 still has ongoing impacts on your life, and you've -- you've expressed that in various ways throughout the deposition. I wanted to give you a chance now to kind of articulate, if you feel the need to, to help me understand how you are still dealing with the issues from that night.

A. Well, this is all going to be held against me. Right? Because I know that you -- there's several people in this room, your room, that I don't want this to be held against me and I don't want them coming after me. I am terrified of the police. I fear that when this is completely done, that I'm going to have to move because you guys are going to come after me more so than ever. I am -- I am not a strong person, physically, like I used to be. I can't defend myself. Is this what you want to know?

Q. Really, I just wanted you to tell me the -- the things that you're still dealing with that -- that are consequences of what happened back in 2021.

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A. I'm suffering from very strong PTSD.

Q. Can I just ask, have you ever been diagnosed with PTSD?

A. Yes.

Q. Who diagnosed you with that?

A. Again, I'm not a doctor and I can't remember the name.

Q. Do you remember what kind of doctor?

A. I just know that they were a doctor and I -- this -- this whole thing -- this whole thing that -- that we're going through just gives me -- just makes me sick inside and just gives me -- just does not go well with me.

Q. In talking with Taylor yesterday -- or sorry. It was with Charlie. He specifically mentioned that this is a topic that seems like everybody in the family tries to avoid because of the -- the memories that it brings back. Has that been your experience as well?

A. So it's two -- it goes two ways. We don't like to talk about it, but sometimes we do talk about it when it's just the six of us. Chris, myself -- and actually, I will say -- I wanted to say the six of us without the -- without the girls. Well, actually, I'll say with -- with the five of us. Without some of the spouses too. When it's just Chris, myself, Taylor, and

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Charlie, and Brittney. We don't talk about it around Holli because she wasn't there. She has no clue. She kind of -- it just -- she -- anyways.

But we talk about it and we just talk about it very vaguely just to -- just to -- just maybe very here and there. But it's just a very bad thing and I -- to us. It's just a very hard, sad thing. And sometimes we'll just bring it up for a few minutes and we'll just voice our -- our feelings about it.

And I will say I will never again ever feel -- feel safe around the police. I pray all the time that I never have to call them because I don't trust them.

Q. All right. Have you called the police since this incident in April 2021?

A. You know, I don't know if I have; and if we have, I don't think they would do anything for us.

Q. Have any American Fork police officers been to your home since April 23, 2021?

A. I don't believe so.

Q. I do think that within a day or two of the incident --

A. Oh.

Q. -- perhaps an officer came -- came to your home. Do you remember that?

A. Who came?

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Q. I think it was Officer Nakai.
A. And we -- yes. And -- and I do remember that. And we specifically asked that she not come. And out of disrespect and not listening and being above the law, she came over anyways.
Q. Tell me a little bit about that. What -- what's the -- what's the backstory with Officer Nakai that you have such strong feelings with her?
A. She's just really good friends with the -- you know, you're going to have to ask my husband about that one, please.
Q. You don't know what -- what was the basis?
A. I -- I would rather not talk about it. I -- I can talk about it, but I don't want to get the facts wrong. Ask my husband, please.
Q. Well, I certainly will and I -- I -- if -- if there's something that is about the way she has treated you or said to you - I -- I believe that's part of what you're alleging in this lawsuit - I need to know what -- what your -- what your thoughts are toward her and why.
A. Ask my husband.
Q. I will.
A. Thank you.
Q. I certainly will, but I need to ask you as well.

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A. I won't put in good perspective. He would do a better job. Thank you.
Q. Well, we can certainly put it in the proper context, but I do need to hear from you about what your claims are against Officer Nakai. She's a -- a named defendant in this lawsuit.
A. She has been -- she's the one that sent the officers over to completely hurt us and harm us that night. She's the one that put them up to what they did. She's the one that sent them over.
Q. How do you know that?
A. And, then, to make things even worse, when we asked them to come over -- the next day or a couple days later, for whatever reason, she came over when we asked her not to come over. She came over to me to just dig that knife into us the next day and we asked her not to come over. And on top of that, she shoved the paper into our door, which she didn't need to do. She did not need to do that. And she -- she knows how to break the law and get away with it. Ask my husband. He will give you the better details.
Q. I for sure will. Is that all the information that you have?
A. Yes.
Q. All right. You mentioned that you know that

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she was the one who sent over Officers Craig and Blackburn. How do you know that?
A. I know she did. I just want to leave it at that. My husband can give you the details.
Q. What is your basis for that?
A. I want to leave it at that. Thank you.
Q. Well, I understand. But sometimes we have to do what's uncomfortable and --
MR. PEAT: Focus on his question. Answer them to the best of your ability.
Q. (BY MR. FORD) Is the -- is the reason you believe that Officer Nakai sent Craig and Blackburn over because your husband told you that?
A. Why would you think my husband would tell me that?
MR. PEAT: Think of his question.
THE WITNESS: No. It's because she was working that night.
Q. (BY MR. FORD) All right. So you do have a basis for knowing why she was the one that sent Craig and Blackburn over is because she was working at the department that night?
A. Yes.
Q. Did you have any negative experience with Officer Nakai before she sent Craig and Blackburn to your

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home?
A. She would come over and threaten us for no reason.
Q. How many times did she do that?
A. At least one time.
Q. When she came to your home before the time she came after the incident, did she serve you with a citation?
A. I can't remember if she served us with a citation, if she -- or if she gave it to us. If she mailed it in the mail, and we started receiving them in the mail, that's what she did.
Q. And do you know how many -- how many things you received in the mail from Officer Nakai?
A. I want to say it was quite a few.
Q. You mentioned an incident where she left papers in -- in the doorjamb.
A. Yes.
Q. What was that about?
A. I -- I really cannot -- I don't know. But she -- instead of just leaving it under the mat, she pushed it through our door and I thought that was -- anyway, she pushed it through the door.
Q. And that was upsetting to you?
A. I've never had anyone do that before.

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Q. Other than receiving --
A. Yes, yes. I'm sorry, yes. Yes, it was upsetting.
Q. Other than receiving items in the mail and receiving a paper in the door, what other interactions have you had with Officer Nakai?
A. I don't -- she just would threaten us by yelling at us and telling us off as she was walking away from our house, telling us that we would get this or this would happen. She's just not very -- very professional. She's not very professional at her job.
Q. The things that she was saying to you as she was walking away, this is -- is this a single incident you're thinking of?
A. It could be a couple of incidences.
Q. So before this interaction, this altercation with Officers Craig and Blackburn, she had been to your home multiple times?
A. Yes.
Q. And were all of your interactions with her negative?
A. Unfortunately, yes.
Q. After this incident when she showed up at your house, was that the last time you've had interaction with her?

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A. Yes.
Q. Have you had any interactions with anyone else at American Fork Police Department?
A. No. Not that I -- not that I can think of.
Q. So you've -- it's Nakai and Craig and Blackburn are the three that you have interacted with?
A. Yeah. And we haven't had any interaction -- interaction since that night.
Q. Okay. Yesterday, Charlie mentioned that at one point some officers came over to observe lights that were directed at your home.
A. Yes.
Q. Were you involved in that?
A. Say that again.
Q. Were you involved in that? Were you at home when -- when those other officers came?
A. I was at home. I just didn't come outside. Yes.
Q. Okay. You don't know who those other officers were?
A. No, I remember who they were. I do.
Q. And who do you remember? Who were they?
A. I remember Adamson. And I remember Nakai, again, who was unpleasant.
Q. Did you have any interaction with Adamson and

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Nakai at that -- at that time when they came to look at the lights?
A. Adamson was okay, but not truthful. And Nakai was unpleasant.
Q. What was untruthful about something Adamson said?
A. He just says what you want to hear him say and then writes in his report a totally different story.
Q. So tell me what he said that was different than what was written in his report.
A. Well, he -- he -- he acted like he was going to take care of -- well, he talked to us and he followed my son. My son went out there to show him how much the lighting -- they're these canister lights, these decorative lights that are supposed to shine up on your trees, your -- your trees to make them look good. Right? And you're supposed to shine them towards your home. But, instead, they put a million watts in them, and they shine them at our house. And so not only are they shining at our house, but they're shining them at two of our bedrooms. And they're a million watts.
And so he goes out there, takes Adamson to see how bright they are. And Adamson says, "Yeah, you're right. These shouldn't be shining at your house. I'll go tell them to turn them off."

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And he -- the neighbor argues and fights with them -- or not fights, but argues and -- but in the short -- in the short version, Adamson writes this report -- this bad report and it's not good. He's writing about us, saying that basically we're the problem.
Q. So when you said that he was not truthful, the things he wrote in his report were not truthful?
A. Well, because he makes it sound like he's going to help us, but in the long run, he's saying what he can to -- he's saying what he can to act like he's going to help us, but in the report it's negative about us.
Q. Okay.
A. If that makes sense.
Q. I understand what you're telling me. Nakai was with Adamson on that incident?
A. You were?
Q. Was Nakai with Adamson at -- at that time?
A. Oh, no. I -- you know, she could have been in the car. She could have been -- because a lot of times, I notice that these officers are together and they -- one stays in the car, one stays on the sidewalk. I don't know what they're doing.
Q. Okay.
A. And she was -- later on, she -- she came over

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and she gave us a hard time too. She would -- she just was -- she was just always never -- she was never nice to us.

Q. Do you remember specifically what she gave you a hard time about?

A. She just -- she always just told us that we were in the wrong and that the lights -- you know, the lights were fine and we shouldn't be complaining about them. You know, just the whole thing.

I'm sorry. Can I have a break for a minute?

MR. FORD: You bet.

VIDEOGRAPHER: We're off the record. The time is 12:54.

(Break taken from 12:54 p.m. to 1:00 p.m.)

THE VIDEOGRAPHER: We're back on the record. The time is now 1:00 p.m. Counsel may proceed.

MR. FORD: Thank you.

Q. (BY MR. FORD) We are just about done. So I think we should be able to wrap this up in short order, at least for me.

Have you had telephone-call interactions with American Fork police officers?

A. No. Are...

Q. You've alleged in your complaint and you've talked about today the feeling that the American Fork

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Police Department has taken sides against you and your family. Do you have a feeling of why that is?

A. You know, I'm just -- I'm not sure.

Q. All right. Do you feel like there have been situations that you have involved the police department and they gave you a favorable result?

A. Can you rephrase that question? Or...

Q. Yeah. I -- I -- I'm assuming that you feel like when the American Fork Police Department has been involved in disputes, that you have not received favorable outcomes. I wonder if you have ever felt like you've had an interaction with the American Fork Police Department and you did receive a favorable outcome.

A. You know, I really don't recall if I have or not.

Q. It's your feeling that every interaction you've had with the American Fork Police Department has been a bad result?

A. I just don't recall.

Q. Okay. There may have been good outcomes, but you don't recall them?

A. Correct.

MR. FORD: Okay. All right. Well, that's the questions I have for you at the moment. I'm going to pass you to the other attorneys, and I may have some

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follow-up, but hopefully not. We've been at this a while. Thank you.

MR. PEAT: Hyrum.

EXAMINATION

BY MR. BOSSERMAN:

Q. Good afternoon, Mrs. Thorpe. My -- my name's Hyrum Bosserman. I know I -- I saw you yesterday at the deposition, but wasn't able to speak with you directly. As you may know, I represent the City of Cedar Hills and just had a few questions for you with -- specifically with respect to Cedar Hills, who's been named in this lawsuit.

First, I just wanted to ask you just a few follow-up questions. You were just asked a number of questions about your interactions with Officer Nakai. And if I heard correctly, I think your interactions prior to the April 2021 incident, you said there may have been a few times she came out to the house; is that correct?

A. That's correct.

Q. Okay. And do you -- and I know you talked about one of them being the lights issue with the Sanchezes.

A. Correct.

Q. Do you remember what the other -- the other times that she came out, do you know why she was there?

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A. I -- there was a dog. The Sanchez's dog came out, was -- bit me. And she -- I don't know why she came out, but she came out for that.

Q. Okay. And what -- what happened when she came out?

A. She was -- she just came out and was kind of overseeing it.

Q. Did -- sorry. To back up, when was that? Do you remember when that dog-bite incident happened?

A. It was in -- the year was -- or it was in February, and I am sorry if I'm wrong about the date. It was February 2019.

Q. Okay. Okay. And so --

A. I can't -- oh, go ahead.

Q. No, finish. Finish what you were saying.

A. I just can't remember the exact date.

Q. No -- no problem. Time -- yeah, general timeline is fine. I'm just trying to understand.

Okay. You said with that dog-bite case, she - Officer Nakai - came out and was supervising, I think is what you said. Did she speak with you that day?

A. She did.

Q. Okay. How was your interaction with Officer Nakai during that dog-bite incident?

A. Actually, it was decent. If that makes

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sense.
Q. Yeah.
A. Okay.
Q. Not -- not unpleasant, you would say?
A. Correct.
Q. Okay.
A. Yes.
Q. Okay. What -- can I ask, what was the result of that dog-bite incident?
A. Well, the dog was taken away, and I honestly don't understand why she was even there. But the dog was taken away and they lost the case on that and -- does that -- is that enough? Is that --
Q. Yeah.
A. -- enough?
Q. Yeah. That's really -- that's really helpful.
A. Okay.
Q. I'll ask you a few --
A. Okay.
Q. -- follow-ups there.
A. Yeah.
Q. You first said you didn't understand why she wasn't [sic] there. I -- I assume you're referring to Nikia [sic]. Did -- did you call? Do you remember, was

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it -- was it you or the Thorpe family that had called the police off -- out after you got bit by a dog?
A. Yes.
Q. Okay. Okay. You just don't understand why it was her specifically, the responding officer?
A. Uh-hmm.
Q. Okay.
A. Right. What -- yeah.
Q. Okay. Okay. And then you said the dog was taken away. Do you know who took the dog away?
A. A dog -- you know, one of those dog -- she called --
Q. Like, animal --
A. -- a dog -- yes, animal control.
Q. Oh, sorry. I don't -- I don't want to put words in your mouth. Animal control --
A. Yes.
Q. -- perhaps?
(Court reporter interrupting.)
THE WITNESS: Yes. Animal control came and they took it away.
(Court reporter interrupted.)
MR. BOSSERMAN: Yeah. Sorry. That was my fault for interrupting.
Q. (BY MR. BOSSERMAN) So just to be clear so we

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have a clear record. An -- are you referring to animal control as the one that came and took the dog away?
A. Yes, animal control. She -- she actually got on the phone when she -- I believe, and told either -- when she was on her -- on her way over, and they stayed in the front yard and she told them to come and -- and they arrived, and then they came over and picked up the dog.
Q. Okay. And the "she" you're referring to there, is that Officer Nakai again?
A. Yes.
Q. She is the one that called animal control?
A. Yes.
Q. Okay. Okay. And then the last thing you said on that dog-bite case is you said that "they" - I assume the Sanchezes - lost the case. Was there a -- I guess a civil lawsuit that was filed against them for the dog-bite case?
A. Yes.
Q. Okay. And that was brought by you; is that correct?
A. Correct.
Q. Okay. And -- and you -- when you said they lost the case, you -- you got a favorable outcome from that case?

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A. Correct.
Q. Okay. Awesome. Thanks for that. I appreciate that. Other than the light incident and the dog-bite incident, do you remember any other times that -- prior to the April 2021st [sic] incident that Officer Nakai visited your home?
A. You know, I -- I can't remember, but I'm sure that if you ask my husband, if there's anything that I have missed --
Q. Okay.
A. I -- I can't remember.
Q. Okay. That's all I want is just your memory. We'll definitely ask your husband his memory as well. I just want to know, you know, to what you can remember, your recollection, of all the times you can remember that Officer Nakai came out to your home.
How about -- and I -- I may -- this may have been answered already. I just -- really quick. Prior to the April 2021 incident that we've been talking about today, had Officer Craig ever been out to the home, to the Thorpe home?
A. Prior to the incident he had with the confrontation we had that night?
Q. Okay. So -- so you're referring to -- yeah, prior to incident we're talking about where he came into

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the home.
A. You know, I want to -- I -- I don't remember.
Q. Okay.
A. I don't remember. I'm not sure.
Q. Do you recall Officer Blackborn [sic] ever visiting --
A. Yes.
Q. -- the house before the --
A. Yes.
Q. -- incident?
A. Yes.
Q. Okay. What do you remember about his visits?
A. Just rude and unprofessional.
Q. Okay. Do you remember a specific reason why he was called out to your home? Like, I -- and I'm talking specifically about Officer Blackburn.
A. Yes.
Q. Okay. What -- what was that for?
A. As usual, it's the Sanchezes.
Q. Okay. Do you remember specifically what -- what brought him out there in relation to the Sanchezes?
A. I don't -- well, I will say I do remember. It was to do with two things.
Q. Okay.
A. They were complaining about something that

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they said that we did. And I don't -- and I can't tell you the date. I can't tell you anything about dates or anything or even the year.
Q. Okay.
A. But -- but he did come out on a couple of occasions and talk to us.
Q. Okay.
A. And -- and was always just kind of snippety like he was when he came to our house and --
Q. Okay.
A. -- you know, kind of unprofessional.
Q. Okay. On the -- do you remember the -- I know you said you can't remember the date. But when he came out, you do remember those instances being before that April 2021 incident?
A. Yes.
Q. Okay. And do you -- do you remember when you did speak with Officer Blackborn, do you remember the specific reason he was of out there, what the -- what the dispute was with the Sanchezes that was going on?
A. Yeah, it was a complaint about us.
Q. Do you remember what it was about?
A. He wanted to know if we had done something that the Sanchezes had complained, and I can't remember what the complaint was.

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Q. Okay.
A. But that was pretty much it.
Q. Okay. And did that happen -- was that more than once or just once that Officer Blackborn came and talked to you about a complaint from the Sanchezes?
A. I just remember two times and --
Q. Okay.
A. Yeah.
Q. And in both of those times, would you say that he was -- both of your interactions were un -- unprofessional? Is that the word you used, I think?
A. Less than pleasant --
Q. Less than pleasant. Okay. Okay. That's -- that's very helpful. Do you remember having any other interactions before the 2021 -- sorry, April 2021 incident with other officers? We've talked about Officer Nikia, Officer Blackborn. You -- you said you didn't recall -- you don't know whether Officer Craig came or not. You mentioned Officer Adamson came out on a light issue. Any other interactions that you recall?
A. I remember Officer Adamson, but he -- he was always decent and stayed -- you know, he was always decent.
Q. Okay.
A. But in his reports, they weren't --

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Q. Okay.
A. They weren't good.
Q. That's -- that's where you said -- I think that you stated earlier you noticed --
A. Uh-hmm.
Q. -- that he would -- you know --
A. He wouldn't write decent about us. It's like --
Q. He wouldn't write decent about you. Okay.
A. Yeah. And that's what I didn't like. Yeah.
Q. So did you -- have you personally looked at those reports, then?
A. No. So I didn't -- I don't like to go and read these things. I don't really have --
Q. Sure.
A. -- time for it.
Q. Sure.
A. But I just happen to come across one, and I was really shocked because he seemed like a really decent person --
Q. Okay.
A. -- and then I was really shocked to see that --
Q. Okay.
A. -- this is what he had written about us.

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Q. Was that the -- sorry. I didn't mean to talk over you.
Was that the report related to the light issue?
A. No -- yes. Yes, it was --
Q. Okay.
A. -- the report. Yes.
Q. Okay. Okay. All right. Now, I just wanted to ask generally about your interactions with Cedar Hills City. And just to be clear, when I talk about Cedar Hills City, I'm not referring to anybody at the police department or any of the officers. I'm talking about city employees. Have you had any interactions with city employees or officials from Cedar Hills?
A. Not really.
Q. Okay. Have you had any communications with employees or officers [sic] at Cedar Hills?
A. Maybe a few just over the phone. Like --
Q. Okay.
A. -- to make, you know, payments for utilities and -- but never face to face, you know.
Q. Have you had any communications, you personally yourself, with the city with respect to any dispute with the Sanchezes?
A. You know, I'm sorry. Can you rephrase that

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and -- or --
Q. Yeah.
A. -- say that again?
Q. Yeah, absolutely. So we're -- we're talking generally about what kind of interactions you've had with city employees and officials.
A. Okay.
Q. You said there's not very many. You said most of your interactions would be on the phone, like paying bills or things like that. I was asking, do you -- do you recall having any communications yourself with Cedar Hills employees or officials about the Sanchez disputes?
A. So, you know, not really. I mean, I know -- so I'm -- so I probably shouldn't talk for Chris, right? I should --
Q. Yeah, yeah.
A. Yeah.
Q. I just kind of want to know for you.
A. Just for me. Okay. No, no, no.
Q. Okay. I'll definitely ask --
A. I'm sorry.
(Court reporter interrupting.)
THE WITNESS: I'm going based on -- I've heard him talk to somebody, and they're not even there

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anymore, write a -- working on letters, but that's not me directly. Okay.
MR. BOSSERMAN: Oh --
THE WITNESS: Sorry about that.
MR. BOSSERMAN: No, that's great. That's very helpful.
THE WITNESS: Okay.
MR. BOSSERMAN: I'll definitely be --
THE WITNESS: I don't want to get him in trouble.
MR. BOSSERMAN: Okay. Not a problem.
MR. PEAT: Don't talk over each other.
Q. (BY MR. BOSSERMAN) I will definitely be following up with him on that. But I guess to just clarify, you yourself haven't had communications with the city about the Sanchez disputes.
A. Correct. No.
Q. Okay. But you said that you have talked to your husband about him having communications with the city about certain Sanchez disputes.
A. So I shouldn't even say that.
Q. Okay.
A. I've -- I think I've heard.
Q. Okay. Okay. No problem. But --
A. I don't want to get him in trouble.

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Q. No, you're fine. But you don't know for sure.
A. Right.
Q. Okay. Great. Well, that's -- that's helpful. Thanks. Now, when you've had these -- how have your interactions been with city employees when you're paying bills?
A. Fine. No --
Q. Okay.
A. No problems.
Q. Okay. Have you had any -- you personally had any negative interaction with the city?
A. No.
Q. Okay. Okay. Now, I want to just ask you a few quick questions, if I can. You may recall in the depositions that were taken yesterday of your -- your two sons, we kind of listed out some of the incidences with the Sanchezes that they could remember. And I just wanted to ask you some generic questions on -- on each one of those to see what your memory is on them.
The -- the first incident I had wrote down was an incident related to a shed. The Sanchezes had a shed on the property line or on your -- on the Thorpes' side of the property. This was in 2017. Do you remember that?

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A. I do.
Q. Okay.
A. Yes.
Q. And does that sound right, in 2017?
A. Yes.
Q. Okay. What do you remember about that incident?
A. I remember -- and I'm sorry, it may have been in 2016.
Q. Okay.
A. We kept -- we had just purchased the home.
Q. Okay.
A. And we had a -- and this is why I remember, is that we had a -- we had our insurance person come over. And we didn't know they were going to come over and actually go around and do a thorough inspection. And --
Q. Okay.
A. -- they did the thorough inspection. We didn't know this for another couple weeks, they charged us for having two sheds. And finally they actually called us and said, "You guys, we" -- "we want to know, you guys have two sheds, one down below and one on top?" And we said, "No, we don't. We only have one." And they said, "No. We spotted that you have two, and your

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property is," da-da, "this big."
Q. Okay.
A. And we were like, "Oh." So that also told us that our property was so big, and that's when we told the city we need help in moving that shed.
Q. Okay. Do you remember speaking with any city officials specifically about that shed incident?
A. Not me specifically.
Q. Okay. But do you remember Chris speaking with the city?
A. I don't know who he talked to or what he did.
Q. Okay. Fair enough. Do you remember what the outcome was of that -- that incident with the shed?
A. I know it wasn't good and I know they weren't happy, but they had to move it.
Q. Okay.
A. And it took them a long time and we shouldn't had to put up with that.
Q. Okay. And when you say "they had to move it," you're talking about the Sanchezes?
A. Uh-hmm.
Q. And you said they weren't happy with it, the Sanchezes?
A. No.
Q. Okay. Okay. Then the next one we kind of

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touched on was the floodlight incident. Do you remember when that took place by chance?
A. That's been going on since July of 2020.
Q. Okay.
A. And those flood -- those lights have been pointing up - oh, gosh - it seems like four or five years. And I could be wrong about the date.
Q. Okay.
A. But those lights have been pointing up in our bedroom window --
Q. Okay.
A. -- that long with a million watts in three of our bedroom windows.
Q. Okay. I think you -- you had made mention or we had talked about in -- in relation to that floodlight issue, you had -- and I don't want to put words in your mouth. I'll -- I'll just ask it. Did you call the American Fork Police Department with respect to that light incident?
A. Yes.
Q. Okay. Was that you speak -- do you remember you doing that specifically?
A. So I don't know if I did it specifically, but --
Q. Okay.

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A. -- somebody in our family did. It was either Chris or I.
Q. Okay. Great. And then, as we talked about, Officer Nakai and officer Adamson came out?
A. So I don't want to say it was Nakai --
Q. Okay.
A. -- but I want to say it was Adamson or it was this other officer --
Q. Okay.
A. -- that was really decent in his -- he was really a nice guy, and I don't think he works there anymore. But --
Q. Okay.
A. Yeah.
Q. Okay. Do you remember -- I -- I just want to clarify. Do you remember Officer Nakai coming out with -- with respect --
A. Yes.
Q. -- to that light incident?
A. She did come out with the light. Yeah, she came --
Q. Okay.
A. -- out. Yes.
Q. Okay.
A. But she didn't initially talk to us at first.

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She --
Q. Okay.
A. But she did -- she did come and she did have to -- she did want to put her two cents' worth in.
Q. Okay. Great. And, then, it sounds like -- or I guess I'll ask this: What -- what was the result of that incident, the floodlight incident?
A. Well, it didn't go anywhere because they still have their floodlights shining in our bedroom windows to this day. I mean, you --
Q. So --
A. Oh, go ahead.
Q. No. Sorry. I didn't mean to cut you off.
A. No, go ahead.
Q. Okay. So -- so did the Sanchezes not move the lights?
A. Nope. No.
Q. Oh, and they didn't adjust the lights at all?
A. Nope.
Q. Okay. So from the time that you complained to American Fork Police Department until now, those lights have remained unchanged?
A. Yes.
Q. Okay. Do you know if you reached -- do you remember reaching out to the City of Cedar Hills about

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the lights?
A. I am sure we have.
Q. But you don't remember anything specifically?
A. You know, I'm going to be honest with you. We have done -- we have done everything we can and we just get ignored.
Q. Okay.
A. We really have. We just get ignored.
Q. Okay. With respect to the -- the floodlights specifically, do you remember reaching out to the city or do you not know?
A. No, I know my husband has reached out.
Q. Okay. Okay. Do you -- do you recall what the city's response was?
A. They just don't do anything for us. They -- it's like they -- it's like they just ignore us. I'll tell you how far back we went and talked to somebody. We talked to Jenny Peay and Jenny Peay tried to help us and then she quit.
Q. Okay. And what's your understanding -- who is Jenny Peay?
A. So Jenny Peay is -- actually works for the city. She was, like, the city code enforcer.
Q. Okay.
A. And she saw so many things that were going on

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and she kept on trying to help us and trying to tell us, "You need to do this. You need to go" -- "to go through this avenue," and do this and do this. And she could see nothing was going to happen and, finally, they kind of twisted her arm and said, "Don't" -- "Don't do this, don't do that. You can't do this. Leave the Thorpes alone. Just don't do any more." And then one day we found out that she quit. She just left. And then we -- we just kind of keep on trying to work with the next person and we're not -- we're just not getting anywhere.
Q. Okay. I want to back up. On Jenny Peay, it sounds like you -- your initial contacts with -- were with Jenny Peay. You said that she -- I don't want to put words in your mouth. Would you say that she was helpful in her communications with you?
A. I will say she started out as helpful. Excuse me, my voice. She -- hold on one second.
Q. No problem.
A. I will say she tried -- she was helpful. She was seeing a lot of things that were going on. She was pointing out things that they were doing -- that the city -- that the Sanchezes were doing that was not right towards us, and that was happening and she was trying to help us. But then I think the city said, "No, don't do that anymore." And, then, before you know, politics got

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involved and something happened and she was, like -- almost like -- she wasn't turning on us. But quietly she was like, "I can't do this for you," "I can't do this for you." And, then, before you knew, she just quit.
Q. Do you remember when she quit?
A. I -- you know, we've had so much things happen. I want to say it was in 2023 or twenty-twenty -- it -- I want to say it was in 2023.
Q. Okay. And -- and, then, I want to back up. You said at -- at some point in time, you felt like she -- and I don't want to put words in your mouth, but perhaps was less helpful than she had been before. Is that a fair way to characterize it?
A. It is, but I don't think it was her fault. I think somebody was telling her to not be as helpful, like -- you know. Like --
Q. Okay.
A. -- pressuring her not to --
Q. Yeah.
A. -- help us. Yeah.
Q. Do you -- do you remember that timeframe when you felt like that shift happened?
A. Yeah. Around 2020 -- oh, gosh. 2020.
Q. Okay.
A. And then things just started crumbling and

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then -- yeah.
Q. Okay. And you said that you believe that you know somebody had spoken to or -- or -- I don't want -- again, I don't want to put words in your mouth. Something had happened or somebody -- somebody potentially spoke to her. Do you have any knowledge about that?
A. No. But you know how you can -- you have kind of a sense? Like, you can just kind of sense it. Like, she was -- she was a decent -- she was -- she is still a decent person. But, like, you can just sense, like, she was kind of backing off. Like, she didn't want to help us as much.
Q. Okay.
A. And, like, she was just -- like -- I don't know. There's just a -- like a -- she was trying to put a barrier up. Like, she didn't -- you know.
Q. Okay. That's helpful. I'm going to go through these really quick, these other ones that I wrote down. We already talked about the dog-biting incident, so I won't -- I won't talk any more about that except to ask you, do you know, did you or anyone in your family contact Cedar Hills about the dog-biting incident?
A. You know, I -- I can't be -- I can't recall. I --

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Q. Okay.
A. Probably. Oh, no. But I -- yeah. You know, I contacted the police because the dog was constantly coming in my yard and attacking me. Does that --
Q. Okay.
A. -- count?
Q. But you don't -- you don't remember contacting Cedar Hills?
A. I can't recall, no.
Q. Okay. Perfect. Now, there's a -- an incident related to a metal gong or shooting target that was talked about yesterday. Do you --
A. Right.
Q. I guess, what do you remember about that incident?
A. All I know is that that really should not have been a big deal. It was 20 -- it's, like, 30 -- it's, like, 25 feet away from their property, and they made a big deal out of nothing. And I don't know where they're -- why it was such a big deal.
Q. Okay. Do you remember American Fork police being involved with respect to that shooting target?
A. I don't remember. I don't think they were.
Q. Okay.
A. I don't remember, but I don't think they

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were.
Q. Do you remember if Cedar Hills was involved?
A. I don't recall.
Q. Okay. And what was the -- what was the outcome of that incident?
A. You know, it seems like -- you're going to have to talk to my husband about that. I -- it -- it was ridiculous. I -- I don't want to get all the facts mixed up, but it was --
Q. Okay. I just -- I'm just looking for your recollection. I'll definitely speak with your husband. What do you recall the outcome being from that incident?
A. Twenty-five feet away from our -- from their home and it was -- it should -- it was far enough that it shouldn't have been a problem. That's all -- that's all I can recall.
Q. Okay. I -- I believe I heard one of your sons yesterday mention something about a stalking injunction.
A. And we got --
Q. Is there --
A. Yeah. Yes.
Q. Was there a stalking injunction issued against --
A. Yes.

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Q. -- your family with respect to that?
A. Yes.
Q. And did the Thorpes get -- I -- excuse me, not the Thorpes. Did the Sanchezes, were they the ones that filed a lawsuit with respect to that?
A. I think so. I'm not sure. You know what, I -- I'm not sure about that whole -- how that whole thing goes.
Q. Okay. But you do recall the Sanchezes got a stalking injunction; is that correct?
A. No. I don't think they got one. I think we got one. The Thorpes. We got one.
Q. Oh, excuse me. So did you -- sorry. Did the Sanchezes get a stalking injunction against you, the Thorpes?
A. Yes.
Q. Okay. Okay. The fifth one I have written down -- sorry. I'm trying to hustle here. There was an incident that was talked about, garbage being deposited on the lower part of the -- of your property, the Thorpe property. Do you recall that incident?
A. By Maria?
Q. I'm not positive. I just know that we -- we had spoken about with your sons yesterday that there was an incident about trash being piled up or garbage being

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piled up by the -- I think it was by the fence line in between yours and the Sanchez's property, if I understand correctly. Do you remember --

A. Well, I --

Q. -- that incident?

A. I actually have a picture of her throwing garbage on the fence -- through the fence. But we did never -- we never threw, like, garbage. So it's kind of very confusing. They built a rock wall inaccurately. So there's, like, 10 to 15 feet of property down there that's ours.

Q. Okay.

A. If that makes sense.

Q. Uh-hmm.

A. And so there might be things, like, down there that's -- that she might consider garbage, like grass clippings, but it's not -- there's no garbage. And if there is garbage, it's from her. She's actually thrown -- picked up things with tongs or, like, something and thrown it in our yard.

Q. Excuse me. And when you say "she," you're referring to Ms. Sanchez?

A. Yes.

Q. Okay. Do -- I'm curious. Just do you remember that incident happening, though? Or there being

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some dispute about garbage on the lower part of your property?

A. I am sure she's complained.

Q. Okay.

A. I don't know when, but...

Q. Do -- do you remember ever receiving a -- a courtesy notice of potential violation from the city with respect to --

A. Yes.

Q. -- the garbage?

A. Yes.

Q. Okay. And do you remember what the -- the outcome was of that incident?

A. They -- I guess it was fine. Everything was cleared up and taken care of. I mean, we -- nothing happened.

Q. Okay. You don't remember having to pay any fine or anything like that?

A. No.

Q. Okay.

A. We definitely didn't have to pay anything.

Q. Okay.

A. I mean, I would know.

Q. Yeah. Okay. But do you remember having to pick up some garbage down by that at some point?

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A. So we didn't really need to, but we just cleaned it up just so that it would be fine. It would be --

Q. Okay.

A. You know, it looked decent and -- yeah.

Q. Do you -- do you remember having any interactions with the city about that incident?

A. I think we tried to talk and make sure everything was okay, and the city just said everything was fine.

Q. Okay. Great.

A. Yeah.

Q. Now -- sorry. I -- I'm almost done with these here. The -- we -- there was a rock-throwing incident - I think that's the incident - or an alleged rock-throwing incident that precipitated that April 2021 incident with the police officers; correct?

A. Yes.

Q. Okay. On -- I just want to ask just real quick about that rock-throwing incident. Do you know, did -- do you know if Cedar Hills was ever contacted about the rock-throwing allegations?

A. You know what, I -- I don't know. I was not -- I wasn't part of that.

Q. Okay.

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A. And can I say something about that?

Q. Yeah, sure.

A. That was something that Maria Sanchez created.

Q. Okay. And when you say she created it, what do you mean by that?

A. I -- you know what, I'm just going to leave it at that.

Q. Okay. Fair enough. But with the rock-throwing allegations, obviously you do remember American Fork police being dispatched for that altercation; is that right?

A. Yes.

Q. Okay. And then the next one I have on my list is a dispute over trees. And I believe one of your sons testified that there were allegations that the Thorpes were killing the Sanchez's trees. Do you remember that incident?

A. Yes.

Q. Can you tell me about that.

A. You know, that's a long story. And they have -- they're not happy with anybody that lives in this house -- this home. And --

Q. They --

A. The Sanchezes.

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Q. Okay.
A. And I really want to leave that up to my husband to talk. I'm starting to lose my voice. And they -- they're very vindictive. And so...
Q. Okay. Well, I don't want to take up -- take up all of your voice here. Can you just --
A. Yeah.
Q. Can you give me, generally, what you understood happened --
A. They --
Q. -- with that incident?
A. Yeah. They -- they just wanted to try to -- can -- can you ask my husband about that?
Q. Sure. I -- I definitely will. Sorry. I -- I hate to sound kind of like a broken record.
A. Okay.
Q. All I -- all I'm asking is --
A. Because -- yeah.
Q. -- for your recollection.
A. Okay.
Q. If you don't have any, or you don't know, that's fine. I'll -- I'll definitely ask him. Just what you recall what happened with that incident.
A. I just -- I just remember it was them trying to sue us over trees and they -- it was not a very --

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they didn't -- they didn't get what they wanted and it was just not a good thing. And they have just been vindictive ever since, so...
Q. So that -- that incident resulted in a lawsuit; is that correct?
A. Yeah. Yes.
Q. What was the outcome of that lawsuit? Do you remember?
A. It actually just created a monster of them and they didn't win.
Q. Okay. The last one I have on this -- on my list here is an incident with allegations over spraying water. Do you remember that?
A. Yes. So the spraying water -- the trees down below -- so the -- the trees -- so you've got to understand. Nobody understands this. They -- they took the property -- they tried to take -- they tried to take the property down below. And when they first moved -- moved here to their -- to their home, they -- they tried to take 15 feet of property, and that's why they put the shed on the wrong property.
So we got the property back and they planted the trees right on our property. When we got the property back, it was told -- we were told that we had to keep the trees alive. I was watering the trees.

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Whenever they see us out in our backyard, they think that they can just come out there and intimidate us, call us names, anything they can do.
I was watering the trees and he got into the waterline -- into the water stream -- up into the waterline, because there's not a real fence and he got into the overspray of the water. Does that make sense?
Q. Yeah, it does. And "he" is Mr. Sanchez; that right?
A. Yes.
Q. Okay.
A. And -- yeah. And he still wore the same clothes for the rest of the day because even when the police came, he was still wearing the same clothes.
Q. Okay. Do you remember that the police got involved in that incident?
A. Uh-hmm.
MR. PEAT: Verbal.
THE WITNESS: Yes. Yes.
Q. (BY MR. BOSSERMAN) Okay. And -- and I assume -- I guess, do you know who called the police?
A. I don't know which one of them called the police, no.
Q. But you believe it was the Sanchezes?
A. Yes.

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Q. Okay. Do you know if -- was Cedar Hills contacted about that?
A. I don't know.
Q. Okay. You don't remember contacting Cedar Hills about that?
A. No.
Q. Okay. What was the outcome of that spraying water incident?
A. You know, honestly, I think it was just -- I'm not sure exactly. I think it was dropped.
Q. Okay. Do you --
A. But we --
Q. Nobody in your family was charged with anything --
A. I don't believe so.
Q. Okay. Do you know when that incident occurred? Sorry, I should have asked that. Do you know --
A. Yeah.
Q. -- the timeframe?
A. I think it was October of 2020.
Q. Okay. And I just -- sorry. Going back. I neglected to ask, on the -- on the -- the tree -- the alleged tree-killing incident, do you know what -- if -- whether Cedar Hills was involved in that dispute at all?

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A. I don't think so.
Q. Okay. Do you know if American Fork police got involved in that?
A. You know, they would come out for -- you know, I don't know. I'm not sure.
Q. Okay. Okay. Great. Well, I just have a few more questions. In -- in paragraph 16 of the operative complaint, there's a mention about how -- there's a mention in there about the policies of Cedar Hills causing harm. I just wanted to ask you what policies are you aware of, of Cedar Hills, that has caused you or your family harm?
A. I'm not sure. Can you rephrase that?
Q. Sure. Are -- I guess I'll start with -- this way. Are you aware of any policies of Cedar Hills?
A. You know, I'm aware of some of the policies; but we -- you know, I'm not really aware of everything.
Q. Okay. What -- what policies are you aware of?
A. Just the -- the basics, I guess.
Q. What do you mean by that?
A. Well, I mean, like, about doing -- about, like, you know, how you should live and taking -- doing the trash and about keeping up your yards and, you know --

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Q. Okay.
A. -- things like that. Like, the basics.
Q. Okay. Okay.
A. And, you know -- you know, things like that. And keeping your yards trimmed back and things like that. But -- and I don't have any small children. I don't have children anymore. So my husband and I really kind of do our own thing. And I don't mean, like, we just don't care. We are into our own things. And --
Q. Okay.
A. -- into things with our children and our family and different -- into a different category, I guess. So when you're telling me -- you're asking me about these policies, what do you mean?
Q. Okay. I think I understand. I think if I can sum it up, you -- you are aware generally of, you know, Cedar Hills' policies or rules or how -- how it -- you know, a city should function.
What I'm kind of looking for specifically is, are you aware of any policies of Cedar Hills directly tied to this incident? So, for example, policies governing how police officers should -- how police officers should act. Are you aware of any Cedar Hills policies to that effect?
A. I am, yes.

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Q. Okay. And how -- are these written policies that you've seen?
A. I guess I've seen written and I -- and it's just common knowledge too.
Q. Okay. What written policies have you seen?
A. Things that my husband has pulled up.
Q. From Cedar Hills specifically?
A. Yes.
Q. Okay. Do you recall what the title of those policies were?
A. No.
Q. Okay. And do you recall what those policies say?
A. Not offhand.
Q. Okay. Do you -- in this -- in -- in the complaint, you specifically allege that the policies of Cedar Hills directly cause Plaintiffs harm. What policies are you referring to?
A. Well, you know, that fact that -- the fact that I have lights going into my bedroom windows, the fact that I feel that I can't -- I have to worry that the police will maybe come and batter me up if I don't do something right, or that the Sanchezes can call the police on me and I still have to worry. I mean, is that what you're talking about? I mean, I'm trying to figure

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out.
Q. Yeah, I guess --
A. I'm not --
Q. I guess I'm just trying to get at what specifically do you believe is, you know, some sort of regulation, ordinance, policy, procedure at Cedar Hills that has caused you harm?
A. I don't feel safe. I have to worry about my neighbors not doing the right thing.
Q. And -- and you attribute that to some policy at Cedar Hills?
A. Well, Cedar Hills has policies in their books, and then they're not helping to encourage them to follow these policies. I mean --
Q. Yeah, I --
A. -- you don't --
Q. Sorry.
A. No, go ahead.
Q. Yeah. I guess that's what I'm trying to understand. What -- when we say they -- there's these policies out there and Cedar Hills need to enforce them or they're not following them, I'm trying to understand what policies specifically you're talking about.
A. Their lights.
Q. Okay. Lighting?

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A. I mean --
Q. Okay. Lighting?
A. Their lights. Yeah. Their lights.
Q. Lighting. What -- what other ones?
A. Knowing that we have decent officers that -- you know, that are patrolling and they're are not going to hurt us.
Q. Okay.
A. I mean, I'm sure there's a list of them; I just -- I just can't think of them offhand.
Q. Fair enough. With respect to this last one that you mentioned of, you know, having officers, do you -- when you've had negative interactions with, for example Officer Nakai, have you called Cedar Hills and complained to Cedar Hills about those negative interactions?
A. How am I supposed to complain to Cedar Hills about that when Cedar Hills -- well, tell me what I'm supposed to do.
Q. Oh, sorry. I -- I'm just asking. Do you remember calling Cedar Hills and complaining to them about their -- about American Fork Police Department?
A. No.
Q. Okay. Let me ask this. There is an allegation in the complaint that we looked at yesterday

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talking about Cedar Hills taking the side of the Sanchezes over the Thorpes. Do you remember that?
A. I don't recall, but probably.
Q. Let's see here. I'm going to just quickly -- it will be faster this way. If I can share my screen, I --
MR. BOSSERMAN: Michael, I don't know if you've got that -- let's see if I can. Oh, I'm sending the request now. Let's see if I can share my screen here. Okay. I think I got it. Let's see.
Q. (BY MR. BOSSERMAN) Can you -- can you see this in front of you? This is a -- let me scroll to the top. I want to make sure the right screen's up. Do you see this is the Second Amended Complaint Verified and Demand for Jury. Do you see that?
A. Yes.
Q. Okay. So this is what was yesterday entered into as Exhibit 3. I just want to ask you - I've got about four more questions and I'm done - do you see right here, paragraph 60 here? This paragraph alleges that "Cedar Hills, AFPD and AFPD officers early on took sides supporting and encouraging the Sanchez's actions."
Just wanted to ask you, what is your understanding -- how do you know that Cedar Hills took sides supporting and encouraging the Sanchez's actions?

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A. Well, we actually have it on -- we could actually show it to you on -- on their -- their cameras when -- when -- when Officer Nordin goes to their home and says -- actually uses the phrase -- and I'm sorry, I'm not saying it completely word for word -- and says he's going to a meeting and "We all are on" -- says to the Sanchezes, "We are all on your side."
Q. Okay. And so I would just want to back up. You -- you've seen a video where Officer -- did you say Norman?
A. Nordin. Nordin.
Q. Oh, Nordin. Okay. Officer Nordin is speaking with who?
A. To the Sanchezes.
Q. Okay.
A. Probably Ted.
Q. Okay.
A. I'm sorry, Ed. The -- mister --
Q. Ed.
A. I should say "Mr. Sanchez."
Q. Okay. And Officer Nordin says something to the effect of, "We are on your side"?
A. No, not to the effect. He says it. "We are all" --
Q. So he --

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A. -- "on your" --
Q. Okay.
A. Yes.
Q. "We are all on your side." Okay.
A. Yes.
Q. Do you know, in that video, is -- other than Officer Nordin, is there anybody there from Cedar Hills?
A. What do you mean is there anyone there from Cedar Hills?
Q. In that -- in that video -- or when Officer Nordin said that, do you know -- is -- was there, you know, like, Jennifer Peay there or --
A. No.
Q. -- a code --
A. No.
Q. -- enforcement officer?
A. No.
Q. Okay.
A. He's just there at their home and he's wearing his body cam.
Q. Okay.
A. Like, you know, their -- their camera on them?
Q. Sure.
A. And he goes over to talk to them, and he's

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wearing his body cam and he's there to talk to them. And he says, "I want you to know that the whole police department," meaning American Fork Police Department, "is all on the Sanchez's side."

Q. Okay. Okay.

A. I mean, how -- I mean, I'm not -- you know, I'm letting you know, that's pretty direct.

Q. Okay. Okay. Other than that video, do you know of any other actions that Cedar Hills has taken to encourage or actively participate in the Sanchez's actions against the Thorpes?

A. Yeah. There's -- there's a few others. I mean, I -- I can't -- I don't want to get into it right now. But they -- there's another one where she's in the office with -- she -- they're both in deck -- I'm sorry, Detective Murray's office.

Q. Okay.

A. And they're in Detective Murray's office and she base -- they're both basically whining to get their way so that they will get him to turn the tables to side with them, and he does.

MR. PEAT: Hyrum, can we take a quick bathroom break?

MR. BOSSERMAN: Yeah, absolutely.

MR. PEAT: Thank you.

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MR. BOSSERMAN: Yep.

VIDEOGRAPHER: We're off the record. The time is 2:01.

(A brief break was taken.)

VIDEOGRAPHER: We're back on the record. The time is 2:10.

Q. (BY MR. BOSSERMAN) Okay. So, Ms. Thorpe, we were -- we were -- you were talking before the break about an interaction between Detective Murray and the Sanchezes. And I was just going to -- I was just going to have you continue on that. It sound -- or at least I assume it's between Detective Murray and the Sanchezes; is that correct?

A. Correct.

Q. Okay. And you said that the Sanchezes were whining to Detective Murray; is that correct?

A. They were complaining and they just kept on talking until they got him to listen and go with what they wanted him to do. And that's what they would do.

Q. Okay. And it's -- is that a -- did you personally observe that, or is that body-cam footage?

A. That's another body-cam footage.

Q. Okay. And who -- from what you remember from that body-cam footage, who was -- who was present there with Detective Murray and the Sanchezes?

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A. Just the three of them.

Q. Okay. We were looking -- sorry. I'm going to have to share. I'll have to put this back up on the shared screen for you. We were looking at this paragraph 60. And I was -- you talked about these two body-cam footage. I just wanted to see if there's anything else that you recall that Cedar Hills has done to actively participate in the Sanchez's actions against the Thorpes.

A. So Denise Anderson, who works as the mayor -- is what you want to know?

Q. Sure.

A. She has participated by going to meetings, like this -- this -- I'm sorry, this -- this lawsuit that we had, this thing that we had that was against -- with the gong. You know, that -- I -- I'm sorry. I'm lost for words. The gong thing that we got that -- that thing against us that we had that thing. She actually took time out of her schedule to go and be by their side and go to that trial thing for them against us.

Q. Okay. So if I am understanding you correctly, you said at the -- the litigation involving the stalking injunction?

A. Yes.

Q. Okay.

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A. Yes.

Q. And that -- that Denise Anderson attended that?

A. Yes.

Q. Okay. And she was by whose side, the Sanchezes?

A. Sanchezes.

Q. Okay. During that lawsuit?

A. Yes.

Q. And was that in court?

A. It was actually, like, a small -- I guess it was considered, like, a court hearing, yes. It was a very serious matter.

Q. Okay. Let's talk about Denise Anderson. I know in the complaint it's alleged that she's believed to be close friends with the Sanchezes. Tell me what you know about that.

A. Just like what it -- what you hear, what we're saying. She's good friends.

Q. Okay. And tell me -- I heard yesterday from your sons that she's a member of the Church of Jesus Christ of Latter-day Saints and, if I understand correctly, a member of the ward in your neighborhood; is that correct?

A. Yes.

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Q. Okay. And the Sanchezes are also members of that church; is that correct?
A. Yes.
Q. Okay. And are you a member of that church as well?
A. We are.
Q. Okay. Are -- and I believe your sons yesterday - or at least one of them; I'm trying to recall which one - stated that he has seen Denise Anderson talking at church on Sunday with Mrs. Sanchez.
A. Yes.
Q. Have -- have you also seen that?
A. Yes.
Q. Okay. And is that the basis for your belief that they are close friends?
A. No. I've seen them in other places.
Q. Okay. Where have you seen them?
A. I have heard from neighbors -- I mean, I've heard, I've seen, I've heard, I've seen. We just know. And then for them to ask -- for them to ask to participate in that -- in that deposition -- or not that -- that trial for the stalking injunction against us, I mean, you don't go to something like that against somebody. I mean, she didn't need -- she didn't need to come to that.

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Q. Okay.
A. Denise did not need to come to that.
Q. But you had heard -- you've heard -- I guess, you -- you were mentioning that you've heard from neighbors that they're good friends; is that correct?
A. Yes.
Q. And then you've seen them interact?
A. Yes.
Q. Okay. Okay. Did -- did Denise Anderson -- did she testify at that hearing?
A. I believe she was going to, and she had to state that she had -- she stated that she was there; and then she stated that she had to leave because of being on the city -- mayor, and that she had to leave.
Q. Okay.
A. She -- yeah. And that is not accept -- to me, that's like -- you don't do things like that when you're a city --
Q. Okay.
A. When you're a major.
Q. So when she said she had to leave, did she say, "I have to excuse myself because I'm the mayor of Cedar Hills"?
A. I believe something like that.
Q. Okay.

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A. I believe that's what she did.
Q. And -- and then did she leave the hearing?
A. Yes.
Q. Okay. When you saw her at the hearing, was it -- was it at the very start of the hearing that you saw her?
A. Uh-hmm, yes. She came from the -- she got there early, and she stayed for a couple hours; and then she had -- then she had to state that she was leaving.
Q. Okay. Was -- was -- well, anyways, we don't need to go into that further. Okay. That's -- that's very helpful. I appreciate that.
Let's see. If you will look at -- I just want to go to paragraph 77. If you'll look on the screen here, you'll see in paragraph 77 of Exhibit 3 that we're looking at, there's an allegation that says Cedar Hills AFPD, AFPD officers responses [sic] to the Sanchez's allegations by threatening, intimidating, and failing to address the Sanchez's bad acts.
What -- what do you know about Cedar Hills threatening the Thorpes? As -- I guess, has Cedar Hills ever threatened you or your family?
A. You -- you know, they have. I just don't have it in front of me. There's been so much bad feeling -- not just feelings, bad history that has gone on that I

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can't get into it right now. But yes, there has been so many bad acts, I can't even get into it.
Q. Okay. Okay. That's what -- so this is just because, you know, I represent Cedar Hills. I'm just trying to get a full picture so we understand what is being alleged against us. You -- you said that Cedar Hills has threatened you or your family. Can you give -- can you tell me when that's happened?
A. Just not helping us in so many things that we've asked for help in. Causing us so much anguish and feeling uncomfortable. I mean, you name it. It's almost like we feel like, you know, you're -- there's just so much. And I almost feel like somebody's ripping up the letters that we send you guys. Well, we don't do any -- we don't send you anything anymore, but I know that we were sending letters to Jenny for help in things. But I know that there's things no more -- I know that we can't -- I know that we don't do anything anymore. We don't ask for help, we don't send anything, you know. My husband and I are very, very patient.
Q. Okay. So I heard -- I heard you say that -- that Cedar Hills isn't helping you. Do you remember any -- any threat that was made? Did anybody at Cedar Hills ever threaten you or your family?
A. I think there have been -- I actually feel

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like there have been some things. I just can't think of them offhand right now. I -- I -- I -- I just can't think of them.

Q. So you remember instances where some sort of city employee or city official threatened you?

A. Well, you know, it can be -- it doesn't have to be they're threatening us personally; but it can be like they're not wanting to do their job and help us or -- in other -- other ways. I mean, do you understand? I mean, do you understand what I'm saying? Do you kind of follow what I'm saying?

Q. I think so. What I'm trying to figure out is if -- if you remember any specific threat that was, I guess, communicated to you or your family by Cedar Hills.

A. Not offhand right now.

Q. You don't recall any?

A. I don't recall.

Q. Okay. And I've -- just to -- to follow up on that. Do you believe there are some instances where a city employee or official threatened you or your family, or you don't recall there being any instances where that happened?

A. I just can't recall right now -- right now.

Q. Do you recall any interactions with a city official where they yelled at you?

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A. I can recall a city official yelling at my kids, yes.

Q. And when was --

A. And being biased.

Q. When was that?

A. When I first moved here. When I first moved to Cedar Hills.

Q. Okay. And so was that 2016?

A. Yes.

Q. Okay. What happened then?

A. This person was just yelling and telling my kids they couldn't do something, and then threatening that they were -- if they didn't turn around and go the other way, they were going to start taking pictures of them and -- like, so -- and it was just they were acting crazy and nutty.

Q. Do you remember who that was that was yelling?

A. Yeah. It was Denise Anderson.

Q. Okay. And it was Denise Anderson yelled at -- at your kids?

A. Yes.

Q. Okay. Do you remember what it was about?

A. She didn't like something -- yeah, I was actually right there with them. And she didn't like that

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they were riding their four-wheelers where -- where everybody else was riding them, and she just didn't like it.

Q. Okay. Where were they riding them?

A. Up above. Just where this -- on this dirt road.

Q. Okay. A dirt road by your home?

A. Yes.

Q. Okay. Other than the -- other than that incident with Denise Anderson, do you remember any other incidences that had somebody yelling or that were -- an unpleasant interaction with city employees or officials?

A. No.

Q. Okay. Let's see. I'm going to look just real quick at -- on page -- or sorry, paragraph 95. You'll see on -- on the screen here -- oh, excuse me. It comes -- this -- this one here, "I," talks about Cedar Hills fully adopting an ideology of the Sanchezes as the good guys and the Thorpes as the bad guys. Can you talk to me about that? What -- how do you know that Cedar Hills adopted this ideology that Sanchezes are good, Thorpes are bad?

A. It's just the way they treat us.

Q. Okay. And how -- can you elaborate on that?

A. Well, whenever there's an issue and they ask

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for something to be done, you guys immediately take their side. If we ask for something to be done, you tell us to go take a hike, basically. And I'm just going to leave it at that.

Q. Oh, okay. So to -- to sum it up, basically, when the Sanchezes complain about something, the city takes their position. Is that what you're saying?

A. Correct.

Q. And when the Thorpes complain about something, the city doesn't take their position?

A. That's correct.

Q. Okay. Now, we had spoken earlier about an incident with a shed, where Cedar Hills got involved with the Sanchezes having the shed on the wrong side of their property. Do you remember that?

A. I do.

Q. Okay. Do you believe in that incident that the city was taking the Sanchez's position?

A. I do.

Q. And I believe you -- you testified that -- that the city ordered the Sanchezes to move their shed onto their property; is that correct?

A. That's correct.

Q. Okay. But you see that as -- you see that as the city taking the Sanchez's position?

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A. Say that -- repeat that again.
Q. Yeah. I guess the outcome of that shed incidence, do you feel like that was the city taking the Sanchez's side?
A. Well, you guys took, like, five months to get them to move their shed. I mean, that's not reasonable. Is that reasonable?
Q. Do you know -- and you believe -- or how long, I guess, do you believe that it took them to take five -- or to move the shed, the Sanchezes?
A. It took them five months.
Q. Okay. Do you know why that's the case?
A. Because you didn't push them to move it.
Q. And when you say "you," you mean Cedar Hills?
A. Cedar Hills did not follow through and get them to move it.
Q. Okay. And so that's why you feel like Cedar Hills didn't take the Thorpes' side on that issue; is that correct?
A. Can I -- correct. Can I also make another note about that?
Q. Absolutely.
A. It's not completely moved over. It still drains on our property to this day.
Q. The shed does?

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A. The shed is still basically -- barely over the boundaries.
Q. Okay. And it -- I'm sorry. I just want to make clear. Their -- it leaks onto your property?
A. Correct.
Q. Okay. Meaning, like, when it rains outside, water runs off the roof?
A. Onto our property.
Q. Onto your property. Okay.
A. Can I make one more suggestion?
Q. Sure.
A. They don't have it properly up correct. They have animals and critters living under it. It's not properly up and built correctly. They just pulled it over and there's critters and all kinds of things living under it.
Q. Okay. Okay. So there's critters living under the shed currently because --
A. Yes.
Q. -- it was pulled over incorrectly?
A. Yes. Can I make one more suggestion?
Q. I'm going to -- I'm going to ask another question, unless you have a clarifying answer on -- on -- with respect to the shed.
A. No. I'm sorry. I didn't know you were the guy to talk to. You're awesome.
Q. Oh.
A. About Cedar Hills.
Q. What was that?
A. Oh, I said you're the guy to talk to about Cedar Hills.
Q. I am. Yeah, I am.
A. Okay.
Q. Sorry, I -- I didn't mean to come off rude or anything right there. It's --
A. No, no.
Q. You're -- I'm happy to have you make a comment. Was it with respect to the shed?
A. No.
Q. Sorry. I'd just like to --
A. No.
Q. -- keep the questions focused on what we're talking about.
A. There's a lot of issues that they have been getting away with that they have not been taking care of because they are such good friends with Mayor Anderson with their property.
Q. Okay. So --
A. So we'll leave it at that. Yeah, we'll leave it at that.

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Q. So just to clarify, you're saying there are a lot of things that the Sanchezes are getting away with --
A. Uh-hmm.
Q. -- because Denise Anderson is the mayor?
A. Yes.
Q. Okay. Can you -- can you give me some more examples? I think you've cited -- well, I don't want to put words in your mouth. What are some examples of the things that the Sanchezes are getting away with?
A. Well, I don't want to talk about this now, but maybe we can connect another time because I don't want to sidetrack. But there's a -- there's a parking pad that they never got done properly that they just put in on their own. They've done -- they have done so many things because Mayor Anderson is the mayor. But let's not talk about this, because I know we got to get on with this and I don't want other people to be mad at me. So we'll talk another time.
Q. Well, no, no. I -- we definitely want to know. Basically from the city -- just so you understand from the city's position, we're just trying to understand fully what the allegations --
A. Oh.
Q. -- of the city's wrongdoing is --
A. Yeah. No, let's just --

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Q. This is --
A. -- go on.
MR. PEAT: Let him finish.
THE WITNESS: Oh.
Q. (BY MR. BOSSERMAN) Sorry. So this is the forum for me to understand on the record what the complete and total allegations against the city are.
A. Okay.
Q. And so that's why -- you know, I'm -- I'm just trying to figure out what is being alleged against the city of wrongdoing.
A. The big one is -- the big one is they built a rock wall, and they will not move that rock wall to the proper location.
Q. Okay.
A. They won't --
Q. And have you -- have you spoken with the city about that?
A. I have. And the city says -- oh, this happened, whatever time it was, back in 20 -- 2000 --
Q. Okay.
A. -- when the Sanchezes put that rock wall up. And they don't have -- and the Sanchezes will not admit they put that in. And so because of that and the Sanchezes lied about it, there's nobody -- there's

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nothing to confirm that they put that in, and there's nobody to -- to -- there's no city records and nothing.
So they've got her on their side - Mayor Anderson - and she will not -- she is -- she probably threw out the records on that wall. And it's pushed back 15 feet back, and that's what's causing all this havoc on the property.
Q. Okay.
A. So when people come up, they see this rock wall and they think, "Oh, the Thorpes are" -- they think that we are intruding on their property because then there's another fence line, and it's a wire fence line that we had to make because we can't put a real one down --
Q. Okay.
A. -- because we can't put a real one down because they have lied about it.
Q. Now I just want to go back and -- and I'll put this up. I just wanted to make clear for it. I -- I'm hearing a lot about a rock wall. It was my understanding that the parties, meaning the Sanchezes and the Thorpes, stipulated to a boundary line; is that correct?
A. There's a new boundary line, yes.
Q. Okay. And, in fact -- and I'll -- I'll just

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pull this up for you so you can see. I believe it's alleged in your complaint here, paragraph 80. Do you see that here, "Parties stipulated to a boundary line..."?
A. Yes.
Q. Okay. So is there a dis -- is there still an ongoing dispute with respect to that boundary line?
A. No. So that's the new boundary line --
Q. Okay.
A. -- but they built a rock -- originally, they built a rock wall boundary line. If you were to go over there to our home or to the -- to the Sanchez's home, you would see a really large, tall -- anywhere from 10 -- probably 15-foot-tall rock wall that looks like -- that looks permanent that they put in that they stole property. So if you were to go on their line -- I'm sorry. My -- my voice. I'm losing my voice as we talk.
Q. No problem.
A. If you were to go on, you would think this was the real property line. It's a -- it's a rock wall that was built and they built it. And they stole 15 feet or -- yeah, 15 feet into our property. And so that's why the shed got put into our yard. They put that into our yard, and then they planted trees, their trees, in our yard so that they could say --
Q. Okay.

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A. -- this was their property. And then when we moved there, luckily we -- we fought for it and said -- and we fought for it just in time because there is a property thing that you have to get it back before 19 years or you lose it permanently. Anyways, they -- we went to the city, and they say they don't have any record of who built that rock wall.
Q. Okay.
A. And there's got to be something that says who built that rock wall. We know the Sanchezes built it, but they won't fess up. They won't -- they won't admit it.
Q. Okay. And I think you said that you believe that somebody at the city got rid of those records; is that right?
A. No, they didn't get rid of them. They just won't show -- they won't -- they won't provide them to us. They won't show them to us.
Q. And you know that the city has them?
A. I -- I don't know. I mean, I --
Q. Okay.
A. I -- they've got to have them. I mean, wouldn't they have records from that far back, from 2020 or twenty -- 2000?
Q. Do you -- so, but you don't have any personal

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knowledge that the city has those records?
A. I don't.
Q. Okay. But just going back to this paragraph 80 here. Ultimately, it looks like there was a lawsuit that was filed about that boundary line, and it looks like the parties, meaning the Sanchezes and the Thorpes, have settled that boundary-line dispute; is that correct?
A. That's correct.
Q. Okay. And that was settled in February 2019?
A. Correct.
Q. Okay. So currently, now there's no pending issue with the boundary line, is there?
A. No. But they're not -- they're still unhappy.
Q. Okay. Okay. All right. Other than that boundary-line dispute, is there anything else that you believe the Cedar -- Cedar Hills has done to -- to favor the Sanchezes and -- or to the detriment of the Thorpes?
A. Not that I can think of.
Q. Okay. Let's see. I'm going to look at my notes really quick. I think I'm -- oh, let's see here. I've got...
So in the complaint, there -- it was alleged that you believe the city is siding with the Sanchezes.

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Why do you think that is? Is that just because Denise Anderson is -- is the mayor of Cedar Hills?
A. No. There's just a lot going on and, you know, it's just -- it's been going on since - since we've had to deal with the -- with the Sanchezes.
Q. But do you believe that the city is favoring the Sanchezes because they're closer with the Sanchezes?
A. I think it's because the Sanchezes have lived there for a long time.
Q. Okay. Longer than you?
A. Something like that, yes.
MR. BOSSERMAN: Okay. You know, can we -- can we go on a break for two seconds? I'm just going to review my notes, but I -- I'm pretty sure I'm done.
MR. PEAT: Sounds good.
MR. BOSSERMAN: Thanks.
VIDEOGRAPHER: We're off the record. The time is 2:42.
(A brief break was taken.)
VIDEOGRAPHER: We're back on the record. The time is 2:45.
MR. BOSSERMAN: Awesome. Thanks.
Q. (BY MR. BOSSERMAN) Just a few follow-up questions and I'll be done. We were talking earlier about a hearing that Denise Andersen attended in a

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lawsuit between you and the Sanchezes. Do you know whether Denise Andersen was subpoenaed to attend that hearing?
A. I don't think she was.
Q. Okay. Do you know one way or another?
A. No.
Q. Okay. And then I did want to ask you just quickly. There is an allegation in the complaint related to paragraph -- and I'm happy to -- to share my screen again here if you want to look at it. I'll do that now.
If you look here on 96, there's an allegation here about falsifying evidence. Do you know -- what do you know about Cedar Hills falsifying evidence -- or excuse me. I'll ask a different question.
Do you know if Cedar Hills falsified evidence?
A. I don't know.
Q. Okay. Do you -- do you believe Cedar Hills has falsified evidence?
A. I really don't know.
MR. BOSSERMAN: Okay. That's -- that's all my questions. I'll stop sharing my screen here.
EXAMINATION
BY MR. GUELKER:
Q. Hello, ma'am. My name is Gary Guelker. I

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just have a few questions for you and we'll -- we'll get you out of here. I'd like to focus back on those incidents you were talking about with Hyrum earlier where American Fork police officers were called out to investigate disputes between you and the Sanchezes. You -- you remember discussing those during your testimony?
A. Yes.
Q. As part of this lawsuit, are you claiming that American Fork police officers did anything to harm you during those investigations? And let's focus on prior to the rock-throwing incident. I understand the allegations there. But prior to the rock-throwing incident, are you claiming American Fork police officers did anything to harm you during those investigations?
A. Yes.
Q. Okay. And what are you claiming in that regard?
A. Well, they attacked me.
Q. All right.
A. So I'm sorry --
Q. Ms. Thorpe, I'm not talking about the -- the April incident where they came in and -- where they entered your home. And I'm not talking about the rock-throwing incident that precipitated that. I'm talking about the other incident -- incidents or

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investigations. For example, the spray of the water, the garbage being piled up, the floodlight incident. Those are the ones I'm talking about. Okay?
A. Uh-hmm.
Q. During those investigations, are you alleging that American Fork police officers did anything to harm you during those investigations?
A. No.
Q. Okay. All right. And you certainly weren't arrested or threatened with arrest in any of those prior investigations, setting aside the rock-throwing incident and the entry into your home; correct?
A. Well, they did threaten to arrest me.
Q. Okay. During which incident?
A. During the watering.
Q. Okay. Tell me what they said. Are you talking about -- where the allegations of where you were -- it was alleged that you had sprayed water onto your -- onto the Sanchezes -- or Mr. Sanchez?
A. You know, I've got so many things and -- and it's been so long ago, but I believe -- there was -- they -- they threatened me so many times. They -- they actually threatened me -- they -- I believe they threatened me over the phone to come home or to come out of my -- to come to the door or they were going to --

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yes, they -- they've threatened me. I don't know how many times; but yes, they have threatened me.
Q. Okay. Do you have a memory of them threatening to arrest you in connection with the floodlight incident?
A. So I don't know how they would have threatened me with the floodlight, but I don't have a memory about that.
Q. Okay. And I am not suggesting they would. I'm just wanting to know if -- which incidents you may be referring to as when they threatened you to arrest you. What about in connection with the dog-bite incident? Did they threaten to arrest you in connection with the dog-bite incident?
A. Honestly, I don't believe so.
Q. Okay. How about the -- the metal gong incident? Did they ever threaten to arrest you in connection with the metal gong incident?
A. You know, I don't recall.
Q. Okay. How about the incident with garbage being piled up by the fence line? Did they threaten to arrest you in connection with that?
A. I really don't -- don't recall on that one.
Q. Okay. How about the disputes over the trees?
A. I don't believe so.

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Q. Okay. And, then, same question with regard to the allegation of spraying water. Do you remember them ever threatening you with arrest in connection with that?
A. Yes.
Q. Okay. Was it -- was it during the time they came out to -- to investigate at the scene where officers were at the scene, or did it happen afterwards?
A. They threatened -- they just -- they didn't think I was -- they thought that I wasn't -- I don't know how to explain it. They thought I wasn't home -- or they thought I didn't want to come to the door, and I wasn't at home. So they called me on my phone and kept on threatening me to -- they were going to arrest me. If that makes sense.
Q. Okay. And who is "they"? Do you know who it was you were speaking with?
A. Nordin. And I wasn't speaking to anybody. Nordin just threatened me over the phone.
Q. Was this a voice message that he left?
A. Yes.
Q. Okay. All right. Do you still have that message by chance?
A. I believe I do.
Q. Okay. Have you given that to your attorney?

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A. I believe I have.
Q. Okay. I don't think we have it, but I may have missed it. So if -- if we haven't received it, I'd ask for a copy of that, that message. Any other specific instances where you can remember being threatened with arrest in connection with these pre-rock-throwing investigations?
A. That's all I can think of. Or what I just knew.
Q. Sure. And can you give me an idea as to when the -- that message was left in terms of even just the year? Do you remember when that was?
A. Twenty -- 2020. October 2020.
MR. GUELKER: Okay. Okay. All right. That's all the questions I have. Thank you.
MR. PEAT: I don't have any follow-up questions.
FURTHER EXAMINATION
BY MR. FORD:
Q. I just have one quick follow-up and it may be that I just wasn't paying good attention at the moment. When you were asked by Cedar Hills' counsel about the discussion that you saw between Detective Murray and the Sanchezes where they were whining to have Detective Murray go their way, do you remember what that

was about?
A. They wanted a whole bunch of things from them. They wanted them to -- they wanted them to just side with them for a lot of things. Like, just some -- just -- they just wanted to complain about a lot of things about us. I can't remember particularly -- it just seemed like it was, like, a lot of complaints built up that they -- it was -- it was about trash, that they were finding a lot of trash in their yard and they were wanting -- and they were saying that -- that they were saying that we were throwing trash in their yard.
Q. Did you ever receive any kind of a citation from --
A. No.
Q. -- American Fork Police Department on that issue?
A. No.
Q. So in what way did the police department take their side on that issue?
A. Well, they actually came over to our house and talked to us about it.
Q. And -- and what did they say?
A. They actually told us -- you know, he -- he actually came over and talked to us and just said, you know, I -- I'm -- that the Sanchezes are complaining

about this and that, you know. He was just -- he was telling us what they were -- that -- that this is what they were doing. And -- and he had a whole list of things that he was complaining about.
Q. He was just conveying the information that the Sanchezes had told him?
A. Yes.
Q. But he wasn't citing you or ordering you to comply with those, was he; just conveying the information?
A. Right.
MR. FORD: Okay. That's all I have for you. Thanks.
MR. BOSSERMAN: Nothing further from me.
MR. FORD: All right. I think we're --
MR. GUELKER: We're good. Thanks.
VIDEOGRAPHER: We're off the record. The time is 2:56.
(Transcript requests were obtained below on the record.)
MR. FORD: Same.
MR. GUELKER: E-trans, please.
MR. BOSSERMAN: Electric -- electronic would be great. Thanks.
MR. PEAT: Yeah, electronic.
Read and sign, please.

(Signature requested.)
(The deposition concluded at 2:56 p.m.)

(Exhibit No. 6 was marked for identification.)
* * *

Original transcript was filed with Mr. Ford.

Reading copy was submitted to:
npeat@heidlaw.com

C E R T I F I C A T E
STATE OF UTAH)
: ss.
COUNTY OF SALT LAKE)

THIS IS TO CERTIFY that the foregoing remote videoconference deposition, in the foregoing cause named, was taken before me, ROSSANN J. MORGAN, Registered Professional Reporter, Certified Court Reporter in and for the State of Utah, residing at West Jordan, Utah.

That the said witness was by me, before examination, duly sworn to testify the truth, the whole truth and nothing but the truth in said cause.

That the testimony of said witness was reported by me in Stenotype and thereafter caused by me to be transcribed into typewriting, and that a full, true and correct transcription of said testimony so taken and transcribed is set forth in the foregoing pages and said witness deposed and said as in the foregoing annexed deposition.

I further certify that I am not of kin or otherwise associated with any of the parties to said cause of action, and that I am not interested in the event thereof.

WITNESS MY HAND at Salt Lake City, Utah, this 30th day of March, 2025.

ROSSANN J. MORGAN, CCR, RPR

License No.:
4948384-7801

C E R T I F I C A T E

STATE OF _____)
: ss.
COUNTY OF _____)

I HEREBY CERTIFY that I have read the foregoing testimony consisting of 176 pages, numbered from 4 to 179, inclusive, and the same is a true and correct transcription of said testimony, except as to the corrections indicated on the enclosed errata sheet.

_____

JANENE THORPE

SUBSCRIBED AND SWORN to at _____ this _____ day of _____, 2025.

_____

NOTARY PUBLIC

My commission expires:

* * *

Norman W. Peat, Jr., Esq.
npeat@heidlaw.com

March 31, 2025

RE: Thorpe v. American Fork
3/7/2025, Janene Thorpe (#7156192)

The above-referenced transcript is available for review.

Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet.

The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com.

Return completed errata within 30 days from receipt of testimony.

If the witness fails to do so within the time allotted, the transcript may be used as if signed.

Yours,
Veritext Legal Solutions

Thorpe v. American Fork
Janene Thorpe (#7156192)

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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