

1 A CHRIS KELLY WOULD. LORI GRAHAM. I DON'T
 2 KNOW IF JEFF WOULD HAVE OR NOT, JEFF CUNNINGHAM.
 3 Q OKAY. NOW, WHEN YOU SAID THE ONES THAT
 4 CAME BACK YOU FILED, WHERE DID YOU FILE THOSE
 5 DOCUMENTS?
 6 A WE HAVE COMPUTER FOLDERS THAT WE PUT WITH
 7 THE PRINTOUTS THAT CAME BACK FROM 112 THEN, TO BE
 8 STAPLED AND FILED.
 9 Q HOW LONG WERE THOSE RECORDS KEPT TYPICALLY?
 10 A FOREVER.
 11 Q FOREVER. DID YOU EVER CHECK ON ANY OF
 12 THOSE CORRECTIONS TO SEE THAT THE CHANGES WERE
 13 ACTUALLY MADE THAT WERE ORDERED? WAS THERE ANY TYPE
 14 OF FOLLOW UP LIKE THAT?
 15 A YES.
 16 Q IN YOUR EXPERIENCE WERE THE CHANGES MADE
 17 THAT WERE ORDERED ON THE TLD CORRECTION FORMS?
 18 A YES.
 19 Q THERE WOULD, HOWEVER, FROM YOUR -- STRIKE
 20 THAT.
 21 THE PAPERWORK THAT IS BEING KEPT WOULD NOT
 22 INCLUDE THE NAME OF THE PERSON WHO INITIATED THE
 23 CHANGES THAT CAUSED THE TLD CORRECTION FORM TO BE
 24 FILLED OUT, WOULD IT?

1 A NO.
 2 Q ON THE TLD CORRECTION FORM WOULD IT HAVE
 3 YOUR NAME?
 4 A MY INITIALS.
 5 Q OR WHOEVER ELSE FILLED IT OUT; CORRECT?
 6 A YES, SIR.
 7 Q BUT THE PEOPLE WHO FILLED THEM OUT, AS YOU
 8 INDICATED, AREN'T THE PEOPLE THAT ACTUALLY AUTHORIZED
 9 THE CHANGE?
 10 A NO.
 11 Q AND THE PEOPLE WHO AUTHORIZED THE CHANGES,
 12 THEIR NAMES WOULD APPEAR NOWHERE IN THE PAPERWORK,
 13 CORRECT?
 14 A RIGHT.
 15 Q NOW, WHEN THE CHANGES ARE ACTUALLY MADE
 16 ACCORDING TO THE CHANGES THAT ARE INDICATED ON THE TLD
 17 CORRECTION FORMS, DID THE PEOPLE WHO INPUTED THOSE
 18 CHANGES -- STRIKE THAT. THAT'S A BAD QUESTION.
 19 TO MAKE A CHANGE IN A PERSON'S DOSAGE, WAS
 20 THERE A CERTAIN TYPE OF CODE OR ACCESS CODE REQUIRED
 21 TO GET INTO THAT SYSTEM TO MAKE THOSE CHANGES, IF YOU
 22 KNOW?
 23 A I WOULD IMAGINE. I DON'T KNOW.
 24 Q I GUESS MY QUESTION IS, COULD JUST -- COULD

1 ANY EMPLOYEE WALK INTO THERE AND MAKE CORRECTIONS ON
 2 THAT?
 3 A NO. NO.
 4 Q OKAY. I ASSUME -- LET ME ASK YOU THIS.
 5 DURING THE 1990'S, ON A DAILY, WEEKLY, MONTHLY,
 6 QUARTERLY OR YEARLY BASIS, HOW MANY CHANGES WOULD YOU
 7 SAY -- HOW MANY CHANGES WOULD YOU SAY YOU MADE OR YOU
 8 FILLED OUT FORMS FOR?
 9 A QUITE A FEW. QUITE A FEW. SOMETIMES FIVE
 10 PAGES. THERE'S LIKE 25 OR 30 ENTRIES.
 11 Q THAT WOULD BE LIKE A 100, 150?
 12 A YEAH.
 13 Q NOW, THAT TYPE, WHAT WOULD YOU SAY THAT
 14 WOULD HAPPEN, ONCE A YEAR, ONCE A QUARTER?
 15 A ONCE A QUARTER.
 16 Q ONCE A QUARTER. THOSE -- BETWEEN THOSE
 17 QUARTERLY READS, WOULD THERE BE OTHER INSTANCES WHERE
 18 YOU MIGHT INITIATE CHANGES OR CORRECTIONS?
 19 A YES.
 20 Q OKAY. AND HOW MANY WOULD THAT -- THAT
 21 WOULD JUST BE LIKE ONE OCCASIONALLY?
 22 A ONE, SOMETIMES THREE.
 23 Q SO THE LARGEST AMOUNT OF CHANGES WOULD BE
 24 AT THE END OF EACH QUARTER?

1 A YES, SIR.
 2 Q AND WHEN THE BADGES WERE BEING READ ON A
 3 REGULAR BASIS?
 4 A YES, SIR.
 5 Q SO IF THERE WAS 100 TO 150 EVERY QUARTER,
 6 THAT WOULD BE 400 TO 600 A YEAR IF THAT WAS CONSISTENT
 7 THROUGHOUT THE YEAR?
 8 A YES, SIR.
 9 Q ON THOSE TLD CORRECTION FORMS WAS THE
 10 EMPLOYEE'S NAME PUT ON THOSE FORMS?
 11 A NO.
 12 Q WHAT WAS PUT ON THOSE FORMS?
 13 A THEIR BADGE NUMBER, EMPLOYEE NUMBER.
 14 Q SO WAS THIS JUST A SINGLE SHEET OF PAPER,
 15 THE TLD CORRECTION FORM?
 16 A YES.
 17 Q COULD YOU SORT OF DESCRIBE WHAT WAS ON IT?
 18 A IT JUST HAD LIKE A PLACE TO ENTER THE DATE,
 19 THE BADGE NUMBER. LET'S SEE, WHAT THE DOSE WAS, THE
 20 SHALLOW, DEEP DOSE, AREA FOR A CODE. I'M PULLING THIS
 21 FROM MEMORY. I HAVEN'T USED THEM FOR A LONG TIME. I
 22 THINK THAT'S IT.
 23 Q OKAY. WHAT WOULD THE CODE SIGNIFY?
 24 A THE CODE SIGNIFIES WHETHER IT'S A LOST