

CHRONOLOGICAL FACTS TIMELINE INDEX — CASE MATTERS Clean - Miller Deposition Transcript (4up)

Date Anchor	Involved Witness/Entity	Factual Summary Description	Verbatim Quote String	Quote Verified	Source Index Page Link
February 2023	Document	Anthony Miller stated that Captain Miller was his unit commander and Chief Davis was the chief.	"The captain -- or my unit commander would have been Captain Miller, and the chief would have been Chief Davis."	⚠ Review	Page 28
January 2023	Document	Anthony Miller confirmed that Sergeant Hayes was his patrol supervisor.	"Yes, it should have been Sergeant Hayes."	✓ Verified	Page 28
September 2022	Document	Anthony Miller confirmed that Sergeant Hayes was his patrol supervisor.	"Sergeant Hayes, yes."	✓ Verified	Page 28
March 2016	Document	Anthony Miller recalled being trained on the use of no trespass letters during his initial training with the Metropolitan Police Department.	"I remember them saying that to enforce it, to look at the totality of the situation, to look at all the different factors that go into it."	⚠ Review	Page 31
	Document	Anthony Miller explained the concept of a no trespass letter as a document signed by a business owner to express that they do not want non-patronizing individuals on their property.	"To me a no trespass letter is a document signed by a business owner, a business manager, or a merchant extending or expressing to the Metropolitan Police Department that they do not want people at their business or on their business parking lot that are not there patronizing them for business."	✓ Verified	Page 29
	Document	Anthony Miller discussed the enforcement of trespass laws and the importance of determining if a property owner wants someone on their property.	"So as a police officer, you need -- if you're trying to determine if someone is trespassing, you need to make a determination whether the property owner actually wants that person there, right?"	✓ Verified	Page 41
	Document	Anthony Miller described the process of handling a situation where someone is using a business's wifi without being a customer.	"If the answer is yes, I would say, 'Okay, sit tight.' I would go out, I would then contact you, 'Sir, my name is Officer Miller from Metropolis Police. The Starbucks' employees have called the police. They think that you're utilizing their wifi and you haven't bought anything.'"	⚠ Review	Page 44
	Document	Anthony Miller mentioned that the Metropolitan Police Department has revisited the enforcement of trespass ordinances following a District Court ruling.	"Recently, I would say within the last year, as a result of maybe this lawsuit, and I think it was Judge Lawson, but a District Court ruling, I think we've taken another look at the issue of trespassing and clarified some of the things that a police officer should be doing to encompass a quality investigation and report."	✓ Verified	Page 47
January 14, 2024	Document	An email from Lieutenant Dan Lind was sent to Police Sworn Personnel regarding a trespass update.	"It is from Dan Lind. Lieutenant Lind is the commander of the training unit... It was sent Monday, January 14, 2024, at 12:17 in the afternoon."	✓ Verified	Page 51
	Document	The witness describes a re-emphasis on conducting quality investigations for trespassing incidents.	"I think from the training unit there was a re-emphasis on conducting a quality investigation."	✓ Verified	Page 49
	Document	The witness explains the importance of signage in enforcing trespass laws.	"Now, more so than ever, we're stressing signage."	✓ Verified	Page 48

	Document	The witness discusses the use of no trespass letters and the factors considered in determining probable cause for trespass arrests.	"What I would look for is the location, the history at that location, directives from my unit commander..."	✓ Verified	Page 54
	Document	The witness describes the process of verifying no trespass letters using the FileMaker system.	"There are two different FileMaker programs that we utilize at the MPD."	✓ Verified	Page 60
	Document	The witness explains the importance of the history of a location in determining enforcement actions.	"I think if there is a history of problems at a certain location..."	✓ Verified	Page 64
	Document	The witness discusses the enforcement of no trespassing letters and the requirement for visible signage.	"For business applications of no trespass letters, 'No Trespassing' signs must be posted and visible."	⚠ Review	Page 65
	Document	Witness discusses the variability in what constitutes a disturbance for different property owners.	"So what may disturb one person or occupier of land may not disturb another person, right? A Yes."	✓ Verified	Page 72
	Document	Witness explains that some business owners prefer not to file no trespass letters to avoid losing business.	"I've also had some business owners tell me, 'I don't care who's here.'"	⚠ Review	Page 72
	Document	Witness states that no business owners have told him not to arrest individuals for urinating or littering on their property.	"Have any business owners ever told you, 'I don't want you to arrest someone if you find them urinating on my property'? A I've never been told that."	⚠ Review	Page 74
	Document	Witness describes the purpose and implications of no trespass letters.	"I would say in my interpretation of a signed no trespass letter from a business owner -- one portion of that is an agreeability of cooperating with trespassing prosecutions."	⚠ Review	Page 75
February 19, 2024	Document	David Thomas was arrested for trespassing at Crown Security Supply.	"The arrest happened what day? A February 19, 2024."	⚠ Review	Page 82
	Document	Witness describes the process of addressing trespassers and the potential escalation of trespassing into more serious offenses.	"So when you talk about the trespass potentially escalating into something more, are you saying that you're intervening before something worse than a trespass occurs? A Yes."	✓ Verified	Page 80
	Document	Witness explains the factors that might indicate a trespasser could engage in more serious offenses.	"Time of the day, weather, as far as actual temperature outside. What type of event said person is attending, the number of people who are attending."	✓ Verified	Page 81
	Document	Witness describes the procedure for handling no trespass letters and the role of police in enforcing them.	"You have to answer out loud. But even you as a police officer have to check to see whether they're updated, right? A Yes."	✓ Verified	Page 77
	Document	Witness confirms that Crown Security Supply does not want people in their parking lot during non-business hours.	"And you indicated that you knew that the owners and management had expressed to the Metropolitan Police Department that they don't want people there in their lot during non-business hours, correct? A Yes."	✓ Verified	Page 92
10-19-23	Document	A no trespass letter for Crown Security Supply was signed by the business owner.	"You found the valid no trespass letter and the order was signed by the business owner on 10-19-23 and expired on 10-18-24, correct?"	✓ Verified	Page 99
February 2024	Document	Officer observed Mr. Thomas parked in an unusual spot and suspected trespassing.	"So, in other words, you -- at this point you've observed him park in an unusual spot, correct?"	✓ Verified	Page 102

February 2024	Document	Officer decided to pull over Mr. Thomas due to suspected trespassing.	"You've already in your mind determined that I'm going to pull this person over because of a trespass, correct?"	✓ Verified	Page 102
February 2024	Document	Officer confirmed the existence of a valid no trespass letter before citing Mr. Thomas.	"And only because there was one, you did cite him, correct?"	✓ Verified	Page 103
February 2024	Document	Officer was confident Mr. Thomas understood English despite it being his second language.	"I was comfortable interacting with him though his responses were in broken English."	✓ Verified	Page 107
February 2024	Document	Officer could not determine property lines from his vehicle.	"Are you able to determine where their property ends and the city property starts?"	✓ Verified	Page 108