

EXHIBIT D

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID FLOYD, LALIT CLARKSON, DEON DENNIS,)
and DAVID OURLICHT, individually and on)
behalf of a class of all others similarly)
situated,)

Plaintiffs,)

vs. 08CV.01034
(SAS)

THE CITY OF NEW YORK; NEW YORK CITY)
POLICE COMMISSIONER RAYMOND KELLY, in his)
individual and official capacity; MAYOR)
MICHAEL BLOOMBERG, in his individual and)
official capacity; NEW YORK CITY POLICE)
OFFICER RODRIGUEZ, in his individual)
capacity; NEW YORK CITY POLICE OFFICER)
GOODMAN, in his individual capacity; NEW)
YORK CITY POLICE OFFICER JANE DOE, in her)
individual capacity; NEW YORK CITY POLICE)
OFFICER ERIC HERNANDEZ, Shield # 15957,)
in his individual capacity; NEW YORK CITY)
POLICE OFFICER CORMAC JOYCE, Shield #)
31274, in his individual capacity; NEW)
YORK CITY POLICE SERGEANT JAMES KELLY,)
Shield #92145, in his individual capacity;)
NEW YORK CITY POLICE OFFICER LUIS)
PICHARDO, Shield #00794, in his)
individual capacity; NEW YORK CITY POLICE)
OFFICER ANGELICA SALMERON, Shield # 7116,)
in his individual capacity; NEW YORK CITY)
POLICE MICHAEL COUSIN HAYES, Shield #)
3487, in his individual capacity; NEW YORK)
CITY POLICE CHRISTOPHER MORAN, in his)
individual capacity; and NEW YORK CITY)
POLICE JOHN DOES #1 through #11, in their)
individual capacities;)

Defendants.)

DEPOSITION OF ANGELICA SALMERON
New York, New York
Thursday, June 11, 2009

Reported by:
Philip Rizzuti
JOB NO. 23038

1 Salmeron

2 MR. HAZAN: Objection to the form.

3 A. What do you mean?

4 Q. Where it says 2 and then a blank,
5 what is your understanding of what you are
6 supposed to write there?

7 A. Like what conditions we addressed.

8 Q. Okay. Has anyone ever told you
9 that you should complete a certain number of
10 stops every month?

11 A. No.

12 Q. Has anyone ever told you that you
13 should complete a certain number of frisks
14 every month?

15 A. No.

16 Q. Are you encouraged in any way by
17 anyone to stop a certain number of people per
18 month?

19 A. No.

20 Q. If you don't stop a certain number
21 of people in a month is there any punishment
22 that you receive?

23 A. No.

24 Q. When you stop someone for
25 reasonable suspicion do you complete any