

Doyle vs City of Chicago

12 CV 6377

Deposition of: Mayor Rahm Emanuel

Taken on: June 22, 2016

**JENSEN LITIGATION SOLUTIONS**

180 North LaSalle Street

Suite 2800

Chicago, IL 60601

312.236.6936

877.653.6736

[www.jensenlitigation.com](http://www.jensenlitigation.com)





1 APPEARANCES :

2 ED FOX & ASSOCIATES  
3 MR. EDWARD FOX  
4 MR. GARRETT W. BROWNE  
5 MR. JONATHAN KSIAZEK  
6 300 West Adams Street  
7 Suite 330  
8 Chicago, Illinois 60606  
9 Phone: (312) 345-8877  
10 E-mail: efox@efox-law.com  
11 gbrowne@efox-law.com  
12 jksiazek@efox-law.com

13 On behalf of the Plaintiffs;

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
MAYER BROWN LLP  
MR. VINCENT J. CONNELLY  
MR. RICHARD E. NOWAK  
71 South Wacker Drive  
Chicago, Illinois 60606  
Phone: (312) 701-7912  
E-mail: vconnelly@mayerbrown.com  
rnowak@mayerbrown.com

On behalf of the Defendant, City of Chicago;

CITY OF CHICAGO-CORPORATION COUNSEL  
MR. STEPHEN R. PATTON  
121 North LaSalle Street  
Suite 600  
Chicago, Illinois 60602  
Phone: (312) 744-0220  
E-mail: stephen.patton@cityofchicago.org

FORDE LAW OFFICES, LLP  
MR. MICHAEL K. FORDE  
111 West Washington Street  
Suite 1100  
Chicago, Illinois 60602  
Phone: (312) 465-4850  
E-mail: mforde@fordellp.com

On behalf of the Defendant Rahm Emanuel.

\* \* \* \* \*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

I N D E X

WITNESS	PAGE
MAYOR RAHM EMANUEL	
Direct Examination by Mr. Fox.....	4

E X H I B I T S  
(NO EXHIBITS MARKED)

1 (Witness sworn.)

2 WHEREUPON:

3 MAYOR RAHM EMANUEL,  
4 called as a witness herein, having been first duly  
5 sworn, was examined and testified as follows:

6 DIRECT EXAMINATION

7 BY MR. FOX:

8 Q. Could you state your name for the record,  
9 please.

10 A. Rahm, R A H M, Emanuel, E M A N U E L.

11 Q. Okay. For the record, you're the mayor of  
12 Chicago; is that correct?

13 A. Yes.

14 Q. Just for the record.

15 You first announced that you would be running  
16 for your first term as mayor of Chicago in the fall of  
17 2011?

18 A. Correct.

19 MR. CONNELLY: I think that's not correct.

20 MR. FOX: 2010.

21 MR. CONNELLY: Right.

22 BY MR. FOX:

23 Q. Sorry. That's correct, fall of 2010?

24 A. Right.

1 Q. Thank you.

2 And after you announced you began to put  
3 together a -- or assisted in putting together a campaign  
4 staff?

5 A. Yeah.

6 Q. Okay. And among the campaign staff persons  
7 you put together, would be a campaign manager; is that  
8 correct?

9 A. Yeah.

10 Q. Okay. And that was Scott Fairchild?

11 A. Yes.

12 Q. Okay. And you also had a Michael Faulman  
13 working on your campaign with you?

14 A. Correct.

15 Q. And what was his title?

16 A. You know, there's -- I don't know what his  
17 title was.

18 Q. All right. Let me ask you this: What was his  
19 role in your campaign in the fall of 2010?

20 A. The nomenclature is a body person.

21 Q. Okay. And he's described himself as being the  
22 eyes and ears of you so to speak. Would you view that  
23 as being accurate?

24 A. There's a joke there, but I'll leave that

1 alone.

2 Q. Okay.

3 A. Having, you know, worked in the White House  
4 with two presidents that had body persons, it's a person  
5 who would -- you know, making sure, like, because I have  
6 to coordinate things, like, with my family, that he --  
7 interacting that way.

8 Q. Okay. So -- And he would report to you on a  
9 regular basis then, I take it?

10 A. I'm not sure I would characterize it that --

11 Q. All right. Would he communicate with you  
12 about decisions that you made on various things during  
13 the course of your day during the campaign?

14 A. Sometimes, yes; sometimes, no, you know.

15 Q. Okay. Did he help to schedule functions on  
16 your campaign while you were campaigning?

17 A. I don't remember that.

18 Q. All right. Do you recall answering  
19 interrogatories in this case?

20 A. You mean the written?

21 Q. Yes.

22 A. I do.

23 Q. Okay. Do you recall answering two sets of  
24 interrogatories?

1 A. I do.

2 Q. All right. And did you -- After -- You signed  
3 the first set I know. And did you review them after  
4 you -- they were written?

5 A. I sat with Steve Patton who's at the end of  
6 the table --

7 Q. Okay. And then --

8 A. -- the Corp Counsel for this.

9 Q. Okay. And the second set, I understand, were  
10 signed by your counsel, but did you review those after  
11 they were done?

12 A. I can't remember explicitly but I would say  
13 that the questions were reviewed with Corp Counsel and  
14 that we reviewed any of my answers.

15 Q. Okay. So as you sit here today, are the  
16 answers in your interrogatories, are they all correct as  
17 far as you know?

18 A. Yeah.

19 Q. All right. Now, would it be fair to say that  
20 Mr. Faulman didn't have the authority to make any policy  
21 making decisions in connection with your campaign?

22 A. Well, I don't mean to be particular, but  
23 policies, usually when you're running for mayor, is  
24 decisions like what I announced we were going to do as



1 it relates to a full school day, that's what I consider  
2 policy.

3 Q. Okay.

4 A. So he was not allowed to say -- I would  
5 communicate the policy choices of the campaign and those  
6 were things that I laid out very specifically in the  
7 campaign that led to why I felt the people of the City  
8 of Chicago should elect me.

9 And so policy, when you ask me -- and since  
10 you asked it and used that word -- I'm very specific.  
11 It was things I was presenting to the public as it  
12 relates to the policy for the City of Chicago.

13 Q. Okay. Let me be a little bit more specific.  
14 Did he have the authority to pick people would work on  
15 your campaign?

16 A. No idea.

17 Q. Okay. Did he have the authority to pick --  
18 and I'll be a little bit more specific than that. Did  
19 he have the authority to pick who would be -- Well, let  
20 me back up a little bit.

21 You had drivers that worked on your campaign;  
22 is that correct?

23 A. Yes.

24 Q. Okay. And these were volunteer folks that --

1 A. I have no idea.

2 Q. All right. Did he have -- To your knowledge,  
3 did he have authority to choose who would be the  
4 volunteer drivers for your campaign?

5 A. No idea.

6 Q. All right. And I take it then you don't know  
7 who hired these -- the drivers for your campaign to work  
8 on your campaign; is that correct?

9 A. Not something I remember.

10 Q. Okay. And would it be safe to say that you  
11 did not hire any of the drivers that wound up driving on  
12 your campaign?

13 A. I can't remember.

14 Q. Okay. Do you recall if Faulman ever answered  
15 e-mails in your name for you during the campaign?

16 A. No idea.

17 Q. Okay. Is that something that he could have  
18 done from time to time without remembering a specific  
19 e-mail?

20 A. It would be -- I would just be venturing a  
21 guess.

22 Q. All right. Were you familiar with -- During  
23 the course of your campaign back in 2010 and early 2011,  
24 were you familiar with how many different volunteer

1 drivers you had working on your campaign?

2 A. I don't mean to do this, but my focus on my  
3 campaign was about the campaign I was running for the  
4 public not about those type of issues like making sure  
5 that my policies were clear so that the people knew  
6 where I stood as it relates to a full school day, full  
7 school year, that we were going to have universal  
8 full-day kindergarten, what we're going to do as it  
9 relates to our pensions. I was not focused nor should I  
10 be focused, but I was not focused on volunteers  
11 throughout the campaign at any level.

12 Q. Okay. I appreciate that. And if that's the  
13 case, that's fine. I just -- There's just certain  
14 things I need to ask and -- Because I don't know and the  
15 Judge who's going to read this doesn't know unless I ask  
16 the question. So that's the only reason I'm asking the  
17 questions.

18 (Enter Mr. Forde.)

19 BY MR. FOX:

20 Q. The -- And so then by the same token, you  
21 wouldn't have -- would you have known or did you know --  
22 I'll ask it that way -- did you know if any of the  
23 volunteers that you had working as drivers on the  
24 campaign were police officers?

1 A. I can't recall.

2 Q. Okay. The election back in 2011 for your  
3 first term occurred on February 22nd; do you recall  
4 that?

5 A. Yeah.

6 Q. Okay. That was a big day.

7 And at some point after the election, did you  
8 learn that the CPD would be providing you with what I'll  
9 call a transition security team?

10 A. I don't remember.

11 Q. Well, you got -- you got a security team after  
12 your election; do you recall that?

13 A. Well, I do now, yeah.

14 Q. Okay. Well, do you recall -- do you not  
15 recall having a security team working during the  
16 transition period between the election and your  
17 inauguration?

18 A. Yes.

19 Q. Okay. So you do recall having a security  
20 team?

21 A. Yes.

22 Q. All right. And did you learn that the CPD  
23 would be the one that would be -- Let me back up and ask  
24 it this way.

1                   Did you learn or were you aware of how that  
2 security team was chosen? And I'm talking about the  
3 time period between the election and your inauguration.

4           A.    No, not specifically.

5           Q.    Did -- Do you recall having any conversations  
6 with anybody on your campaign staff about how the  
7 transition security team would be chosen?

8           A.    No.

9           Q.    Do you recall having any conversations about  
10 any particular persons that were going to be and that  
11 were on your transition security team?

12          A.    No.

13          Q.    Okay. Do you recall -- So I guess, would it  
14 be fair to say you don't recall recommending anybody in  
15 particular to your transition security team?

16          A.    No.

17          Q.    All right. Were you aware of anybody picking  
18 or selecting folks to be on your transition security  
19 team that worked on your staff?

20          A.    That worked on my staff?

21          Q.    Correct.

22          A.    No.

23          Q.    All right. Would it be fair to say that you  
24 were accompanied by folks that acted in security

1 capacity during the transition period?

2 A. Repeat the question.

3 Q. Sure.

4 You became aware and cor- -- and if this is  
5 incorrect, just say that. But you became aware that  
6 there were folks working in the capacity of security  
7 during the transition period?

8 A. It's not something I focused on.

9 Q. Okay. Do you recall -- Can you recall knowing  
10 any of the folks that were working as security for you  
11 during that time?

12 A. I think you should -- if I can ask you to be  
13 more specific about what you're asking.

14 Q. Okay. Did you know any of the people that  
15 were on your security transition team? Did you know who  
16 they were or when they were doing the work?

17 A. Well, one person.

18 Q. And who did you know?

19 A. Hakki.

20 Q. Okay. Did you anybody else other than Hakki?

21 A. No.

22 Q. Okay. Did you know how Hakki -- And it's  
23 Hakki Gurkan, correct?

24 A. Correct.

1 Q. Okay. And you've known him from prior to the  
2 campaign; is that correct?

3 A. Correct.

4 Q. Okay. Did you know how Hakki Gurkan got  
5 chosen to be on your transition security team?

6 A. No idea.

7 Q. So you don't know who recommended him to be on  
8 your security team?

9 A. No idea.

10 Q. Okay. And then it would be fair to say you  
11 don't know why he was recommended to be on your security  
12 team?

13 A. No idea.

14 Q. All right. Then I guess since he's the only  
15 one you knew, it would be fair to say you don't know why  
16 any of the folks that worked on your security team were  
17 recommended to be on your security team; is that  
18 correct?

19 A. No idea.

20 Q. All right.

21 (Brief pause.)

22 BY MR. FOX:

23 Q. Do you recall if you expressed any preferences  
24 for the qualifications you desired, if any, for any

1 persons on your security -- transition security team?

2 A. Say it again.

3 Q. Sure.

4 Do you recall if you expressed any preferences  
5 to anybody about who -- what kind of persons or what  
6 kind of qualifications you desired for persons who  
7 worked on your transition team -- transition security  
8 team?

9 A. Well, I didn't say anything about anybody.

10 Q. Okay.

11 A. But this -- I told Terry Hillard, This is your  
12 job, not mine. I got a whole transition I got to worry  
13 about. You make -- This is your professionalism, this  
14 is your responsibility, and your expertise.

15 The only thing I said to him was, Make it  
16 smaller than my predecessor and make it diverse, but you  
17 make the call.

18 Q. Okay. And you did meet with Terry Hillard in  
19 person and have a conversation along the lines you just  
20 indicated to him; is that right?

21 A. Correct.

22 Q. And was that on more than one occasion?

23 A. I don't recall or remember.

24 Q. Okay. In terms of whatever it was that you



1 did say to Terry Hillard in connection with your  
2 security detail, did you describe any more  
3 qualifications that you desired other than what you've  
4 just testified to?

5 A. Nothing else.

6 You -- I'll wait until you ask a question.

7 Q. Okay. The meetings that you had with Terry  
8 Hillard, were those during the time of the transition  
9 period between the election and your inauguration?

10 A. I don't remember.

11 Q. Okay. Do you recall having a meeting -- You  
12 recall a man named John Gullickson from the Secret  
13 Service?

14 A. The name sounds familiar but I don't recall  
15 him specifically.

16 Q. Okay. So then you don't recall a man named  
17 John Gullickson attending a meeting with you and Terry  
18 Hillard in connection with security issues?

19 A. Not specifically.

20 Q. Okay.

21 A. Can I -- You understand, my basic point, I'm  
22 coming back from being the Chief of Staff to the  
23 president; security is left to the security experts.  
24 That's not -- That's not my role. That's what Terry

1 Hillard did. That's why I said, Terry, this is your  
2 expertise. Just like when I was the Chief of Staff, I  
3 would say to the security people that would work on  
4 security, This is your expertise. All I ask, if you can  
5 make it smaller, make it smaller, and make it as diverse  
6 as the City of Chicago.

7 Q. Okay. And so was it --

8 A. After that, it's your call.

9 Q. Okay. So was it your understanding that  
10 Chief Hillard selected the -- whatever security staff  
11 you had during the transition period as well?

12 A. All I can tell you is what I said to Terry.  
13 That's not my understanding or recall of anything. It's  
14 just, I don't know.

15 Q. Okay. Let me -- And I think I have a feeling  
16 of what the answers are going to be, but I need to ask.

17 Do you remember going to a Bulls game right  
18 after your election with Michael Faulman?

19 A. No.

20 Q. All right. Let me show you some pictures and  
21 see if this refreshes your recollection at all, and it  
22 may or may not.

23 So we'll just identify this as 142.

24 A. Well, I can say that the guy dressed as Benny

1 the Bull is not Mike Faulman.

2 Q. Okay.

3 A. Was that helpful?

4 Q. Well, let me -- I'm just asking --

5 A. And that he's not on the security detail.

6 Q. Good. And I suspected as much. And I'll show  
7 you another picture we'll call 143.

8 Do you remember -- Do you recall being honored  
9 at a Bulls game right after the election?

10 A. Nope.

11 Q. All right. And that photograph doesn't help  
12 you remember anything about that?

13 A. I mean, all I know it's Benny the Bull and  
14 Scotty Pippen.

15 Q. Okay. So let me show you one more thing, and  
16 this is Exhibit 81 to this trial. It's an e-mail sent,  
17 the lower e-mail.

18 A. Which one?

19 Q. The lower e-mail --

20 A. This one?

21 Q. The middle of the page I'll refer you to.

22 MR. CONNELLY: She won't pick it up. Just visually  
23 show the Mayor where you --

24 MR. FOX: Sure.

1 MR. CONNELLY: -- want him, just so you could help  
2 him.

3 BY MR. FOX:

4 Q. So the one where it starts from R.J.  
5 Hamilton --

6 A. Mm-hmm.

7 Q. -- and it says to Mike Faulman on here.

8 A. Mm-hmm.

9 Q. And then there's a narrative in there and it  
10 talks about names and information of officers that we  
11 are to be requested to be detailed to the mayoral  
12 security detail.

13 Do you ever recall discussing any of -- this  
14 e-mail at all with Michael Faulman?

15 A. Nope.

16 Q. Do you recall discussing it with anybody?

17 A. Not at all.

18 Q. Okay. There's six names mentioned in here.  
19 The first one is Hakki Gurkan, who we've established  
20 that you did know. The next five down, do any of those  
21 names sound familiar to you?

22 A. Well, they do now.

23 Q. Okay. Well, do they sound -- do you recall  
24 who they are at the time -- Did you know their names at

1 the time of --

2 A. I couldn't tell you.

3 Q. Okay. So in February of 2011, you wouldn't  
4 know who they were, is that what I'm hearing?

5 A. I answered your question. I know who Hakki  
6 is.

7 Q. Okay. And so you don't know the rest of these  
8 folks here; is that correct?

9 A. Correct.

10 Q. All right. You're saying you know now. Do  
11 you know that these folks became members of your  
12 transition security detail after you were elected?

13 A. I don't remember.

14 Q. Okay. So then it would be safe to say you  
15 don't know why any of those folks got placed on your  
16 security detail; is that correct?

17 A. Not only is that correct, as I said, Terry  
18 Hilliard's job was to figure that out.

19 Q. Okay.

20 A. I was working on other things as it relates to  
21 the transition that were challenges for the City as well  
22 as opportunities. That was my focus.

23 Q. All right. Good enough.

24 Do you recall Michael Faulman ever asking for

1 your approval to select any of the persons, including  
2 Hakki Gurkan there on this list, to be members of your  
3 transition security detail.

4 A. Nope.

5 Q. Okay. Do you remember Terry Hillard asking  
6 your approval for the selection of anybody either on  
7 your transition security detail or on the -- on your  
8 security detail after you were inaugurated?

9 A. I have no idea.

10 Well, let me say it this way: It was Terry  
11 Hillard's responsibility so, no.

12 Q. Okay. And so I take it it was Terry Hillard's  
13 responsibility, and you don't know how these folks got  
14 on -- Well, let me back and withdraw it.

15 Do you know that these folks that are listed  
16 on this e-mail, the six names that are on that e-mail,  
17 were all campaign volunteers for you?

18 A. Let me just say -- Let me say this: In the  
19 transition, I had ten weeks --

20 Q. Right.

21 A. -- to put a government together, which was  
22 there on day one --

23 Q. Mm-hmm.

24 A. -- and to make sure that we were focused on

1 the policies I told the public so -- that we were going  
2 to follow through on. The last thing I'm focused on is  
3 anything else that had to do with anything else because  
4 that was Terry Hillard's job. I'm focused on what I --  
5 the pledges I made to the public, and I wanted to be --  
6 have government ready on day one. And you can only get  
7 those ten weeks -- those ten weeks and you lose them  
8 after they're done.

9 Q. Okay. So whether it was during that ten weeks  
10 or after that ten weeks, did you know if those folks  
11 that are listed on this e-mail -- any of those six folks  
12 were campaign volunteers for you?

13 A. I can't remember.

14 Q. All right. And inasmuch as you left it up to  
15 Terry Hillard, I would take it then you didn't -- you  
16 yourself didn't voice concerns about whether or not  
17 folks had any particular qualities in connection with  
18 their security work?

19 A. As I said to you, that was Terry's job. I  
20 gave him direction on the size and the diversity. After  
21 that, I was -- I used my time and energy to be focused  
22 on what I pledged to the public and that I'd be ready to  
23 fulfill those pledges.

24 Q. Okay. And then in connection with the

1 security specialists who were working under Mayor Daley,  
2 did you have any opinion about any of them or --

3 Let me ask it this way: Did you know any --  
4 who they were?

5 A. No idea.

6 Q. Okay. Did you have any opinion that you  
7 expressed to anybody, whether or not those folks should  
8 stay on the detail or they should be somehow removed?

9 A. No.

10 Q. Okay. You know who Commander Brian Thompson  
11 is?

12 A. Yeah.

13 Q. Okay. Did you discuss your security detail  
14 with him before May 26th of 2011?

15 A. I have no idea.

16 Q. All right. Do you remember anything that  
17 you've ever discussed with Brian Thompson in connection  
18 with your security detail during the year 2011?

19 MR. CONNELLY: I'm sorry. This -- I'm sorry. Just  
20 so I understand, so you're talking now -- I mean,  
21 because about, what, nine months of that year he was the  
22 mayor and he had a security detail. As long as I  
23 understand correctly, if you want him to try to think  
24 through the whole year --



1 MR. FOX: Let me be a little more specific.

2 BY MR. FOX:

3 Q. Did you ever have any discussions with Brian  
4 Thompson about replacing folks on the Daley -- that were  
5 working on the security detail under Mayor Daley?

6 A. I want to repeat. As it relates to the  
7 security detail, that was Terry Hillard's job. That's  
8 who I asked to do it because he was the professional, he  
9 was the expert.

10 Just like as the Chief of Staff, you would  
11 have Secret Service make these decisions. That's how I  
12 view the world. And I also view, given the time -- the  
13 necessity of seeing through the challenges that faces  
14 the City, I focused on what I thought was important to  
15 the City's future.

16 Q. Okay. During the time period -- Going back to  
17 the time period from the -- your election to the  
18 inauguration, did you voice any concerns with your staff  
19 about trying to ensure that nobody would get a job with  
20 your staff who had -- because they were campaign  
21 volunteers?

22 A. That's a tautology. So why don't you tell  
23 me -- why don't you ask the question again.

24 Q. Okay. Did you have -- Did you have

1 conversations with members of your campaign staff during  
2 the period of -- from your election to your inauguration  
3 in 2011 about trying to ensure that people would not get  
4 jobs just because they had been campaign volunteers, or  
5 if that wasn't your focus, you can say so, just whatever  
6 is appropriate?

7 A. I do not remember any conversation with my  
8 staff about that --

9 Q. Okay.

10 A. -- job.

11 Q. And then -- well, let me expand it a little  
12 bit. Did you have any conversation with Terry Hilliard  
13 or anybody with the Chicago Police Department about  
14 campaign volunteers becoming security specialists?

15 A. I just said before and I'll repeat, my  
16 conversations with Terry were three points: -

17 Q. Okay.

18 A. -- you're the expert, you make the call.

19 Q. Okay.

20 A. B, I would like it to be smaller than  
21 previous; and C, I'd like you to be as diverse as the  
22 City is diverse, your call.

23 Q. Okay. The reason I ask some of these  
24 questions, you were more specific when you were

1 answering -- answered interrogatories. And I can show  
2 you some of them if you'd like.

3 A. It's your call.

4 Q. Okay. Let me do this. And if you could --  
5 I'm going to hand you what's been identified as  
6 Exhibit 37. These are answers to interrogatories.  
7 And --

8 MR. CONNELLY: Just so the Court could follow,  
9 could I note, and would you agree, these are the answers  
10 from March 12th, 2015 --

11 MR. FOX: Yes.

12 MR. CONNELLY: -- since there are two?  
13 Okay.

14 MR. FOX: Of course.

15 BY MR. FOX:

16 Q. And at page 2, at the bottom of page 2, it  
17 says: Answering further, I was not involved in any  
18 requests to have the Chicago Police Department assigned  
19 or detail officers to my security detail and never told  
20 Faulman that he had authority to make such a request  
21 without my approval.

22 So would that be a -- Would you agree, is that  
23 an accurate statement that you told Mr. Faulman never to  
24 make such a request?

1           A.    As I said to your earlier question, I reviewed  
2 this with Counsel, Steve Patton.

3           Q.    Mm-hmm.

4           A.    So as it relates to that --

5           Q.    Okay.

6           A.    -- that's who I reviewed these answers with.

7           Q.    All right. Did you -- When you were -- When  
8 you were in the security tran- -- When you were in the  
9 transition period after your election, did you have  
10 concerns about how your security for your yourself and  
11 your family would be conducted and run for yourself?

12          A.    Say that again.

13          Q.    Sure.

14                During the transition period, from the time  
15 you were elected to the time you were inaugurated, did  
16 you express any concerns other than what you've  
17 indicated to Terry Hillard about how your security would  
18 take place for yourself and your family?

19          A.    Well, let me say, as you probably know,  
20 because it was covered, my family wasn't here so I would  
21 never express anything as it relates to my family  
22 because they weren't here.

23          Q.    Okay.

24          A.    And I did not, again -- I gave my direction of

1 what I thought was important to the person whose  
2 expertise is in the field, Terry Hillard, it was around  
3 the area of diversity and size: one, I wanted it to be  
4 smaller; two, I wanted to be as diverse as the City; and  
5 three, you're the expert. You make the call just like I  
6 would say to the security at the White House where I had  
7 just come from.

8 Q. Okay. And when you told Terry Hillard that  
9 you wanted to be smaller, was that because you wanted to  
10 be smaller than the Mayor Daley's detail or you just  
11 wanted to be smaller in general or how?

12 A. Smaller, means as a context of -- to  
13 something -- that's something, there's only one  
14 precedent, which is my predecessor.

15 Q. Okay. So you -- Then you had some idea. Did  
16 you give Terry Hillard some idea of a number of security  
17 persons you wanted?

18 A. Nope.

19 Q. Okay. And when you talk about you wanted it  
20 to be diverse, did you have some sense of what the  
21 composition of Mayor Daley's security detail was?

22 A. Nope.

23 Q. Okay. So you were just saying, as a general  
24 proposition, you wanted to have a diverse detail?

1 A. I wanted to have it as diverse as the City.

2 Q. Okay.

3 A. I wanted to have it small.

4 Q. Okay. All right. I think we're just about  
5 done.

6 (Discussion off the record.)

7 BY MR. FOX:

8 Q. Who -- Did you give the order for Terry  
9 Hillard to create the team -- a security team for you?

10 A. No idea.

11 Q. You have no idea if you gave an order for him  
12 to do it?

13 A. No. I said -- Repeat the question.

14 Q. Sure.

15 Did you request or order that Terry Hillard  
16 put together a security detail for you?

17 A. No.

18 Q. Okay. Do you know -- So how did that -- So  
19 when it came about, he just came to you and started  
20 talking to you about it?

21 A. I don't remember.

22 Q. Okay. But you don't -- you did not order or  
23 direct him to do that?

24 A. No.

1 Q. That's correct?

2 A. No, I did not order him.

3 Q. Okay. One moment.

4 (Discussion off the record.)

5 BY MR. FOX:

6 Q. Did you indicate to anybody at all at any time  
7 about the quality of the folks that were detailed to  
8 protect you as -- at any time during the transition  
9 period?

10 A. I apologize, but that's a pretty broad  
11 question so say it again.

12 Q. So let me ask it this way: Did you ever have  
13 any complaints about any of the folks who were assigned  
14 to be on your security team during the transition  
15 period?

16 A. Did I have any complaints?

17 Q. Correct.

18 A. About anybody?

19 Q. Correct.

20 A. I don't know.

21 Q. Okay. Did you ever discuss the quality of --  
22 Let me back up a minute.

23 After you were inaugurated, did you --

24 A. After I was inaugurated?

1 Q. Right.

2 After May 16th of 2011, did you discuss with  
3 anybody any of the qualities of anybody that was on your  
4 security detail?

5 A. I can't remember.

6 Q. All right.

7 MR. FOX: I think I have nothing further.

8 MR. CONNELLY: All right. We have no questions.

9 MR. FOX: All right. Thank you.

10 THE WITNESS: Thank you. Have a good day.

11 MR. FOX: You too.

12 (Witness excused.)

13

14

15

16

17

18

19

20

21

22

23

24



1 UNITED STATES OF AMERICA )  
NORTHERN DISTRICT OF ILLINOIS )  
2 EASTERN DIVISION ) SS.  
STATE OF ILLINOIS )  
3 COUNTY OF COOK )

4

5 I, Kim A. Kocimski, Certified Shorthand  
6 Reporter, do hereby certify that MAYOR RAHM EMANUEL was  
7 first duly sworn by me to testify to the whole truth and  
8 that the above deposition was reported stenographically  
9 by me and reduced to typewriting under my personal  
10 direction.

11 I further certify that the said deposition was  
12 taken at the time and place specified and that the  
13 taking of said deposition commenced on June 22, 2016, at  
14 4:02 p.m.

15 I further certify that I am not a relative or  
16 employee or attorney or counsel of any of the parties,  
17 nor a relative or employee of such attorney or counsel,  
18 nor financially interested directly or indirectly in  
19 this action.

20

21

22

23

24

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

In witness whereof, I have hereunto set my  
hand this 23rd day of June, A.D., 2016.



---

KIM A. KOCIMSKI, CSR  
180 North LaSalle Street  
Suite 2800  
Chicago, Illinois 60601  
Phone: (312) 236-6936

CSR No. 084-004610

Doyle vs City of Chicago  
Mayor Rahm Emanuel - 06/22/2016

Index: 12th..examined

<hr/> <b>1</b> <hr/>	<b>approval</b> 21:1,6 26:21	21:17 22:12 24:20 25:1,4,14	12:5,9 25:1,16	<b>discussed</b> 23:17
<b>12th</b> 26:10	<b>area</b> 28:3	<b>campaigning</b> 6:16	<b>coordinate</b> 6:6	<b>discussing</b> 19:13, 16
<b>142</b> 17:23	<b>assigned</b> 26:18 30:13	<b>capacity</b> 13:1,6	<b>cor-</b> 13:4	<b>discussion</b> 29:6 30:4
<b>143</b> 18:7	<b>assisted</b> 5:3	<b>case</b> 6:19 10:13	<b>Corp</b> 7:8,13	<b>discussions</b> 24:3
<b>16th</b> 31:2	<b>attending</b> 16:17	<b>challenges</b> 20:21 24:13	<b>correct</b> 4:12,18, 19,23 5:8,14 7:16 8:22 9:8 12:21 13:23,24 14:2,3,18 15:21 20:8,9,16,17 30:1,17,19	<b>diverse</b> 15:16 17:5 25:21,22 28:4,20,24 29:1
<hr/> <b>2</b> <hr/>	<b>authority</b> 7:20 8:14,17,19 9:3 26:20	<b>characterize</b> 6:10	<b>correctly</b> 23:23	<b>diversity</b> 22:20 28:3
<b>2</b> 26:16	<b>aware</b> 12:1,17 13:4,5	<b>Chicago</b> 4:12,16 8:8,12 17:6 25:13 26:18	<b>counsel</b> 7:8,10,13 27:2	<b>dressed</b> 17:24
<b>2010</b> 4:20,23 5:19 9:23	<hr/> <b>B</b> <hr/>	<b>Chief</b> 16:22 17:2, 10 24:10	<b>Court</b> 26:8	<b>drivers</b> 8:21 9:4,7, 11 10:1,23
<b>2011</b> 4:17 9:23 11:2 20:3 23:14,18 25:3 31:2	<b>back</b> 8:20 9:23 11:2,23 16:22 21:14 24:16 30:22	<b>choices</b> 8:5	<b>covered</b> 27:20	<b>driving</b> 9:11
<b>2015</b> 26:10	<b>basic</b> 16:21	<b>choose</b> 9:3	<b>CPD</b> 11:8,22	<b>duly</b> 4:4
<b>22nd</b> 11:3	<b>basis</b> 6:9	<b>chosen</b> 12:2,7 14:5	<b>create</b> 29:9	<hr/> <b>E</b> <hr/>
<b>26th</b> 23:14	<b>began</b> 5:2	<b>City</b> 8:7,12 17:6 20:21 24:14 25:22 28:4 29:1	<hr/> <b>D</b> <hr/>	<b>e-mail</b> 9:19 18:16, 17,19 19:14 21:16 22:11
<hr/> <b>3</b> <hr/>	<b>Benny</b> 17:24 18:13	<b>City's</b> 24:15	<b>Daley</b> 23:1 24:4,5	<b>e-mails</b> 9:15
<b>37</b> 26:6	<b>big</b> 11:6	<b>clear</b> 10:5	<b>Daley's</b> 28:10,21	<b>earlier</b> 27:1
<hr/> <b>8</b> <hr/>	<b>bit</b> 8:13,18,20 25:12	<b>Commander</b> 23:10	<b>day</b> 6:13 8:1 10:6 11:6 21:22 22:6 31:10	<b>early</b> 9:23
<b>81</b> 18:16	<b>body</b> 5:20 6:4	<b>communicate</b> 6:11 8:5	<b>decisions</b> 6:12 7:21,24 24:11	<b>ears</b> 5:22
<hr/> <b>A</b> <hr/>	<b>bottom</b> 26:16	<b>complaints</b> 30:13,16	<b>Department</b> 25:13 26:18	<b>elect</b> 8:8
<b>accompanied</b> 12:24	<b>Brian</b> 23:10,17 24:3	<b>composition</b> 28:21	<b>describe</b> 16:2	<b>elected</b> 20:12 27:15
<b>accurate</b> 5:23 26:23	<b>broad</b> 30:10	<b>concerns</b> 22:16 24:18 27:10,16	<b>desired</b> 14:24 15:6 16:3	<b>election</b> 11:2,7, 12,16 12:3 16:9 17:18 18:9 24:17 25:2 27:9
<b>acted</b> 12:24	<b>Bull</b> 18:1,13	<b>conducted</b> 27:11	<b>detail</b> 16:2 18:5 19:12 20:12,16 21:3,7,8 23:8,13, 18,22 24:5,7 26:19 28:10,21,24 29:16 31:4	<b>Emanuel</b> 4:3,10
<b>agree</b> 26:9,22	<b>Bulls</b> 17:17 18:9	<b>connection</b> 7:21 16:1,18 22:17,24 23:17	<b>detailed</b> 19:11 30:7	<b>end</b> 7:5
<b>allowed</b> 8:4	<hr/> <b>C</b> <hr/>	<b>CONNELLY</b> 4:19, 21 18:22 19:1 23:19 26:8,12 31:8	<b>direct</b> 4:6 29:23	<b>energy</b> 22:21
<b>announced</b> 4:15 5:2 7:24	<b>call</b> 11:9 15:17 17:8 18:7 25:18,22 26:3 28:5	<b>context</b> 28:12	<b>direction</b> 22:20 27:24	<b>ensure</b> 24:19 25:3
<b>answering</b> 6:18, 23 26:1,17	<b>called</b> 4:4	<b>conversation</b> 15:19 25:7,12	<b>discuss</b> 23:13 30:21 31:2	<b>enter</b> 10:18
<b>answers</b> 7:14,16 17:16 26:6,9 27:6	<b>campaign</b> 5:3,6,7, 13,19 6:13,16 7:21 8:5,7,15,21 9:4,7, 8,12,15,23 10:1,3, 11,24 12:6 14:2	<b>conversations</b>		<b>established</b> 19:19
<b>apologize</b> 30:10				<b>EXAMINATION</b> 4:6
				<b>examined</b> 4:5

Doyle vs City of Chicago  
Mayor Rahm Emanuel - 06/22/2016

Index: excused..opportunities

<b>excused</b> 31:12	20:8,11,15 21:13, 15 22:10,11,17 23:7 24:4 30:7,13	<b>Hillard</b> 15:11,18 16:1,8,18 17:1,10 21:5 22:15 27:17 28:2,8,16 29:9,15	<b>John</b> 16:12,17	24:5 28:10,21
<b>Exhibit</b> 18:16 26:6			<b>joke</b> 5:24	<b>mayoral</b> 19:11
<b>expand</b> 25:11	<b>follow</b> 22:2 26:8		<b>Judge</b> 10:15	<b>means</b> 28:12
<b>expert</b> 24:9 25:18 28:5	<b>Forde</b> 10:18	<b>Hillard's</b> 21:11,12 22:4 24:7		<b>meet</b> 15:18
<b>expertise</b> 15:14 17:2,4 28:2	<b>FOX</b> 4:7,20,22 10:19 14:22 18:24 19:3 24:1,2 26:11, 14,15 29:7 30:5 31:7,9,11	<b>Hilliard</b> 25:12	<b>K</b>	<b>meeting</b> 16:11,17
<b>experts</b> 16:23		<b>Hilliard's</b> 20:18	<b>kind</b> 15:5,6	<b>meetings</b> 16:7
<b>explicitly</b> 7:12	<b>fulfill</b> 22:23	<b>hire</b> 9:11	<b>kindergarten</b> 10:8	<b>members</b> 20:11 21:2 25:1
<b>express</b> 27:16,21	<b>full</b> 8:1 10:6	<b>hired</b> 9:7	<b>knew</b> 10:5 14:15	<b>mentioned</b> 19:18
<b>expressed</b> 14:23 15:4 23:7	<b>full-day</b> 10:8	<b>honored</b> 18:8	<b>knowing</b> 13:9	<b>Michael</b> 5:12 17:18 19:14 20:24
<b>eyes</b> 5:22	<b>functions</b> 6:15	<b>House</b> 6:3 28:6	<b>knowledge</b> 9:2	<b>middle</b> 18:21
<b>F</b>	<b>future</b> 24:15	<b>I</b>	<b>L</b>	<b>Mike</b> 18:1 19:7
<b>faces</b> 24:13	<b>G</b>	<b>idea</b> 8:16 9:1,5,16 14:6,9,13,19 21:9 23:5,15 28:15,16 29:10,11	<b>laid</b> 8:6	<b>mine</b> 15:12
<b>fair</b> 7:19 12:14,23 14:10,15	<b>game</b> 17:17 18:9	<b>identified</b> 26:5	<b>learn</b> 11:8,22 12:1	<b>minute</b> 30:22
<b>Fairchild</b> 5:10	<b>gave</b> 22:20 27:24 29:11	<b>identify</b> 17:23	<b>leave</b> 5:24	<b>Mm-hmm</b> 19:6,8 21:23 27:3
<b>fall</b> 4:16,23 5:19	<b>general</b> 28:11,23	<b>important</b> 24:14 28:1	<b>led</b> 8:7	<b>moment</b> 30:3
<b>familiar</b> 9:22,24 16:14 19:21	<b>give</b> 28:16 29:8	<b>inaugurated</b> 21:8 27:15 30:23,24	<b>left</b> 16:23 22:14	<b>months</b> 23:21
<b>family</b> 6:6 27:11, 18,20,21	<b>good</b> 18:6 20:23 31:10	<b>inauguration</b> 11:17 12:3 16:9 24:18 25:2	<b>level</b> 10:11	<b>N</b>
<b>Faulman</b> 5:12 7:20 9:14 17:18 18:1 19:7,14 20:24 26:20,23	<b>government</b> 21:21 22:6	<b>including</b> 21:1	<b>lines</b> 15:19	<b>named</b> 16:12,16
<b>February</b> 11:3 20:3	<b>guess</b> 9:21 12:13 14:14	<b>incorrect</b> 13:5	<b>list</b> 21:2	<b>names</b> 19:10,18, 21,24 21:16
<b>feeling</b> 17:15	<b>Gullickson</b> 16:12, 17	<b>information</b> 19:10	<b>listed</b> 21:15 22:11	<b>narrative</b> 19:9
<b>felt</b> 8:7	<b>Gurkan</b> 13:23 14:4 19:19 21:2	<b>interacting</b> 6:7	<b>lose</b> 22:7	<b>necessity</b> 24:13
<b>field</b> 28:2	<b>guy</b> 17:24	<b>interrogatories</b> 6:19,24 7:16 26:1, 6	<b>lower</b> 18:17,19	<b>nomenclature</b> 5:20
<b>figure</b> 20:18	<b>H</b>	<b>involved</b> 26:17	<b>M</b>	<b>note</b> 26:9
<b>fine</b> 10:13	<b>Hakki</b> 13:19,20,22, 23 14:4 19:19 20:5 21:2	<b>issues</b> 10:4 16:18	<b>made</b> 6:12 22:5	<b>number</b> 28:16
<b>focus</b> 10:2 20:22 25:5	<b>Hamilton</b> 19:5	<b>J</b>	<b>make</b> 7:20 15:13, 15,16,17 17:5 21:24 24:11 25:18 26:20,24 28:5	<b>O</b>
<b>focused</b> 10:9,10 13:8 21:24 22:2,4, 21 24:14	<b>hand</b> 26:5	<b>job</b> 15:12 20:18 22:4,19 24:7,19 25:10	<b>making</b> 6:5 7:21 10:4	<b>occasion</b> 15:22
<b>folks</b> 8:24 12:18, 24 13:6,10 14:16	<b>hearing</b> 20:4	<b>jobs</b> 25:4	<b>man</b> 16:12,16	<b>occurred</b> 11:3
	<b>helpful</b> 18:3		<b>manager</b> 5:7	<b>officers</b> 10:24 19:10 26:19
			<b>March</b> 26:10	<b>opinion</b> 23:2,6
			<b>mayor</b> 4:3,11,16 7:23 18:23 23:1,22	<b>opportunities</b> 20:22

Doyle vs City of Chicago  
Mayor Rahm Emanuel - 06/22/2016

Index: order..Terry

<b>order</b> 29:8,11,15, 22 30:2	<b>presenting</b> 8:11	16:11,12,14,16 17:13 18:8 19:13, 16,23 20:24	<hr/> <b>S</b> <hr/>	<b>speak</b> 5:22
<hr/> <b>P</b> <hr/>	<b>president</b> 16:23			<b>specialists</b> 23:1 25:14
<b>Patton</b> 7:5 27:2	<b>presidents</b> 6:4	<b>recollection</b> 17:21	<b>safe</b> 9:10 20:14	<b>specific</b> 8:10,13, 18 9:18 13:13 24:1 25:24
<b>pause</b> 14:21	<b>pretty</b> 30:10	<b>recommended</b> 14:7,11,17	<b>sat</b> 7:5	<b>specifically</b> 8:6 12:4 16:15,19
<b>pensions</b> 10:9	<b>previous</b> 25:21	<b>recommending</b> 12:14	<b>schedule</b> 6:15	<b>staff</b> 5:4,6 12:6,19, 20 16:22 17:2,10 24:10,18,20 25:1,8
<b>people</b> 8:7,14 10:5 13:14 17:3 25:3	<b>prior</b> 14:1	<b>record</b> 4:8,11,14 29:6 30:4	<b>school</b> 8:1 10:6,7	<b>started</b> 29:19
<b>period</b> 11:16 12:3 13:1,7 16:9 17:11 24:16,17 25:2 27:9,14 30:9,15	<b>professional</b> 24:8	<b>refer</b> 18:21	<b>Scott</b> 5:10	<b>starts</b> 19:4
<b>person</b> 5:20 6:4 13:17 15:19 28:1	<b>professionalism</b> 15:13	<b>refreshes</b> 17:21	<b>Scotty</b> 18:14	<b>state</b> 4:8
<b>persons</b> 5:6 6:4 12:10 15:1,5,6 21:1 28:17	<b>proposition</b> 28:24	<b>regular</b> 6:9	<b>Secret</b> 16:12 24:11	<b>statement</b> 26:23
<b>photograph</b> 18:11	<b>protect</b> 30:8	<b>remembers</b> 6:17 7:12 9:9,13 11:10 15:23 16:10 17:17 18:8,12 20:13 21:5 22:13 23:16 25:7 29:21 31:5	<b>security</b> 11:9,11, 15,19 12:2,7,11, 15,18,24 13:6,10, 15 14:5,8,11,16,17 15:1,7 16:2,18,23 17:3,4,10 18:5 19:12 20:12,16 21:3,7,8 22:18 23:1,13,18,22 24:5,7 25:14 26:19 27:8,10,17 28:6, 16,21 29:9,16 30:14 31:4	<b>stay</b> 23:8
<b>pick</b> 8:14,17,19 18:22	<b>providing</b> 11:8	<b>remembers</b> 6:17 7:12 9:9,13 11:10 15:23 16:10 17:17 18:8,12 20:13 21:5 22:13 23:16 25:7 29:21 31:5	<b>select</b> 21:1	<b>Steve</b> 7:5 27:2
<b>picking</b> 12:17	<b>public</b> 8:11 10:4 22:1,5,22	<b>remembering</b> 9:18	<b>selected</b> 17:10	<b>stood</b> 10:6
<b>picture</b> 18:7	<b>put</b> 5:2,7 21:21 29:16	<b>removed</b> 23:8	<b>selecting</b> 12:18	<b>suspected</b> 18:6
<b>pictures</b> 17:20	<b>putting</b> 5:3	<b>repeat</b> 13:2 24:6 25:15 29:13	<b>selection</b> 21:6	<b>sworn</b> 4:1,5
<b>Pippen</b> 18:14	<hr/> <b>Q</b> <hr/>	<b>replacing</b> 24:4	<b>sense</b> 28:20	<hr/> <b>T</b> <hr/>
<b>place</b> 27:18	<b>qualifications</b> 14:24 15:6 16:3	<b>report</b> 6:8	<b>Service</b> 16:13 24:11	<b>table</b> 7:6
<b>pledged</b> 22:22	<b>qualities</b> 22:17 31:3	<b>request</b> 26:20,24 29:15	<b>set</b> 7:3,9	<b>talk</b> 28:19
<b>pledges</b> 22:5,23	<b>quality</b> 30:7,21	<b>requested</b> 19:11	<b>sets</b> 6:23	<b>talking</b> 12:2 23:20 29:20
<b>point</b> 11:7 16:21	<b>question</b> 10:16 13:2 16:6 20:5 24:23 27:1 29:13 30:11	<b>requests</b> 26:18	<b>show</b> 17:20 18:6, 15,23 26:1	<b>talks</b> 19:10
<b>points</b> 25:16	<b>questions</b> 7:13 10:17 25:24 31:8	<b>responsibility</b> 15:14 21:11,13	<b>signed</b> 7:2,10	<b>tautology</b> 24:22
<b>police</b> 10:24 25:13 26:18	<hr/> <b>R</b> <hr/>	<b>rest</b> 20:7	<b>sit</b> 7:15	<b>team</b> 11:9,11,15, 20 12:2,7,11,15,19 13:15 14:5,8,12, 16,17 15:1,7,8 29:9 30:14
<b>policies</b> 7:23 10:5 22:1	<b>R.J.</b> 19:4	<b>review</b> 7:3,10	<b>size</b> 22:20 28:3	<b>ten</b> 21:19 22:7,9, 10
<b>policy</b> 7:20 8:2,5, 9,12	<b>Rahm</b> 4:3,10	<b>reviewed</b> 7:13,14 27:1,6	<b>small</b> 29:3	<b>term</b> 4:16 11:3
<b>precedent</b> 28:14	<b>read</b> 10:15	<b>role</b> 5:19 16:24	<b>smaller</b> 15:16 17:5 25:20 28:4,9, 10,11,12	<b>terms</b> 15:24
<b>predecessor</b> 15:16 28:14	<b>ready</b> 22:6,22	<b>run</b> 27:11	<b>sound</b> 19:21,23	<b>Terry</b> 15:11,18 16:1,7,17,24 17:1, 12 20:17 21:5,10, 12 22:4,15 24:7 25:12,16 27:17 28:2,8,16 29:8,15
<b>preferences</b> 14:23 15:4	<b>reason</b> 10:16 25:23	<b>running</b> 4:15 7:23 10:3	<b>sounds</b> 16:14	
	<b>recall</b> 6:18,23 9:14 11:1,3,12,14,15,19 12:5,9,13,14 13:9 14:23 15:4,23			

Doyle vs City of Chicago  
Mayor Rahm Emanuel - 06/22/2016

Index: Terry's..year

**Terry's** 22:19  
**testified** 4:5 16:4

**thing** 15:15 18:15  
22:2

**things** 6:6,12 8:6,  
11 10:14 20:20

**Thompson** 23:10,  
17 24:4

**thought** 24:14  
28:1

**time** 9:18 12:3  
13:11 16:8 19:24  
20:1 22:21 24:12,  
16,17 27:14,15  
30:6,8

**title** 5:15,17

**today** 7:15

**token** 10:20

**told** 15:11 22:1  
26:19,23 28:8

**tran-** 27:8

**transition** 11:9,16  
12:7,11,15,18  
13:1,7,15 14:5  
15:1,7,12 16:8  
17:11 20:12,21  
21:3,7,19 27:9,14  
30:8,14

**trial** 18:16

**type** 10:4

---

**U**

---

**understand** 7:9  
16:21 23:20,23

**understanding**  
17:9,13

**universal** 10:7

---

**V**

---

**venturing** 9:20

**view** 5:22 24:12

**visually** 18:22

**voice** 22:16 24:18

**volunteer** 8:24  
9:4,24

**volunteers** 10:10,  
23 21:17 22:12  
24:21 25:4,14

---

**W**

---

**wait** 16:6

**wanted** 22:5 28:3,  
4,9,11,17,19,24  
29:1,3

**weeks** 21:19 22:7,  
9,10

**White** 6:3 28:6

**withdraw** 21:14

**word** 8:10

**work** 8:14 9:7  
13:16 17:3 22:18

**worked** 6:3 8:21  
12:19,20 14:16  
15:7

**working** 5:13  
10:1,23 11:15  
13:6,10 20:20 23:1  
24:5

**world** 24:12

**worry** 15:12

**wound** 9:11

**written** 6:20 7:4

---

**Y**

---

**year** 10:7 23:18,  
21,24

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICK DOYLE, DANIEL HOULIHAN, )  
JOHN NOLAN, ROBERT OLSON, MICHAEL )  
PADALINO, JOHN PIGOTT, EUSEBIO RAZO, )  
VERONICA RODRIGUEZ, MICHAEL ROMAN, )  
RICHARD SOTO, and CAROL WEINGART, )

Plaintiffs, )

vs. )

THE CITY OF CHICAGO, BRIAN THOMPSON, )  
Individually, TERRY HILLARD, Individually, )  
RAHM EMANUEL, Individually, MICHAEL )  
FAULMAN, Individually, and GARRY )  
MCCARTHY, Individually, JAMES JACKSON, )  
Individually, BEATRICE CUELLO, Individually, )  
and EUGENE WILLIAMS, Individually, )

Defendants. )

Case No.: 12-CV-6377

JUDGE LEINENWEBER

**NOTICE OF FILING**

To: ALL PARTIES OF RECORD

**PLEASE TAKE NOTICE** that on June 23, 2016, the undersigned electronically filed with the Clerk of this Court, **DEPOSITION TRANSCRIPT OF MAYOR RAHM EMANUEL**, the service of which is being made upon you.

s/Garrett W. Browne  
\_\_\_\_\_  
Garrett W. Browne

**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2016, I filed and served the foregoing with the Clerk of the Court using the CM/ECF system.

s/Garrett W. Browne  
Garrett W. Browne  
ED FOX & ASSOCIATES  
300 West Adams, Suite 330  
Chicago, IL 60606  
(312) 345-8877  
gbrowne@efox-law.com