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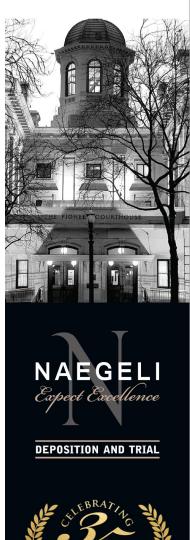
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## IN THE MATTER OF SPOKANE POLICE DEPARTMENT RESIGNATION OF CHIEF FRANK STRAUB

INTERVIEW OF

KEITH CUMMINGS

TAKEN ON TUESDAY, May 24, 2016 12:00 P.M.

SPOKANE COUNTY COURTHOUSE 1116 WEST BROADWAY AVENUE SPOKANE, WASHINGTON 99260

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1	INTERVIEW OF
2	KEITH CUMMINGS
3	TAKEN ON
4	TUESDAY, May 24, 2016
5	12:00 P.M.
6	
7	MS. CAPPEL: So today's date is May 24th, 2016.
8	It's 12 o'clock right on the button. I'm here with Keith
9	Cummings.
10	And Keith, will you spell your name for the
11	record?
12	MR. CUMMINGS: Yes. It's C-u-m-m-i-n-g-s.
13	MS. CAPPEL: And as you can see, I'm recording
14	this interview. Do I have your permission to record the
15	interview?
16	MR. CUMMINGS: Yes, you do.
17	MS. CAPPEL: Can you tell me how long you have
18	been with the police department and the various roles that
19	you've held?
20	MR. CUMMINGS: Yeah. I was hired in September of
21	1990 from the I previously worked for the Stevens County
22	Sheriff's Department for about seven years. Since I've been
23	with Spokane, I've held multiple positions in various
24	departments throughout the the Police Division now, I
25	guess it's called.

I was promoted to detective in '95. I'm sorry,
'96. Promoted to sergeant in '99, held several different
positions as a sergeant, patrol, school resource officers,
SIU, or narcotics, crime analysis, targeted crimes, and I
think that was about it.

Promoted to lieutenant in 2010, also worked patrol there, assigned to Internal Affairs in 2011, spent two years in Internal Affairs, went back to patrol in 2013, was promoted to captain in the middle -- about June of 2013, again, was the patrol captain for a few months, and then assigned as the North Side -- or the North Precinct Commander when it was first -- first going.

MS. CAPPEL: When did that happen?

MR. CUMMINGS: That was -- that was about November -- November of 2013.

MS. CAPPEL: And what's your current assignment?

MR. CUMMINGS: My current assignment is

Administration and Special Teams. I was moved out of the

North Precinct in January of 2015, and I've been in the

administration position ever since.

MS. CAPPEL: And the transfer from the North

Precinct to Administration, was that considered a positive

move? Is that something you wanted?

MR. CUMMINGS: Well, it was actually -- it's kind of interesting you ask it that way, because I was not

notified of the -- the move at all. I ended up receiving a text from then Assistant Chief Rick Dubrow right after a CompStat meeting, in which -- the CompStat meetings were always, you know, performance based, and apparently, I hadn't performed very well.

But about an hour after that meeting, I got a text from Chief Dubrow asking me to meet him and Chief Straub at 11 o'clock. This would have been, like, the middle of December or late December of 2014.

I asked what it was about, and he said it was to your 2015 assignment. And so I was rather surprised that I hadn't heard anything about it.

My initial reaction was, it was disciplinarian in nature, but I went and -- and matter of fact, I went to Chief Dubrow's office prior to 11 o'clock to let him know exactly that; that I felt that this was a disciplinary move, I did not agree with it, and he was rather surprised. He said, "Actually, Keith, I think you're really going to like the assignment," and he was right.

The -- the -- the move into the admin spot actually removed me from a lot of the pain, if you will, from some rather public dressing down that Chief Straub would -- would do with the precinct captains. And I have. I mean, I've really enjoyed the assignment. I've got a lot of stuff done since I've been there.

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1
             MS. CAPPEL:
                          Okay.
                                  When Chief Straub came on
   board, which was October of 2012 --
 2
 3
             MR. CUMMINGS:
                            Yes.
 4
             MS. CAPPEL: -- you were a lieutenant.
 5
             MR. CUMMINGS: Lieutenant in Internal Affairs at
   the time.
 6
 7
             MS. CAPPEL: And have you held leadership
 8
   positions in the Lieutenant and Captain Association?
 9
             MR. CUMMINGS: I was the -- matter of fact, right
   up and to that point, right after I made lieutenant, I was
10
11
   asked and accepted the vice president spot in the Lieutenant
12
   and Captains Association. However, upon my assignment by
13
   Chief Kirkpatrick into Internal Affairs, I ran into a couple
14
   of situations where I thought there was a conflict of
15
   interest.
16
             And my recommendation, actually, to the
   Association was, if your assignment is Internal Affairs, you
17
18
   should not hold the president or vice president spot.
   There's -- there's just too many situations where a conflict
   of interest came into place. So I had asked and did
20
   subsequently submit a -- resigned that position as vice
21
22
   president.
23
             MS. CAPPEL:
                         So how long did you hold it?
24
             MR. CUMMINGS:
                             It was about a year and a half.
25
   mean, I was into Internal Affairs for a few months before I
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1
   realized the problem.
 2
             MS. CAPPEL:
                         Okay.
 3
             MR. CUMMINGS: So, yeah, about a year and a half.
 4
             MS. CAPPEL:
                         And you have not held positions
 5
   within the Association since then?
 6
             MR. CUMMINGS: No.
 7
                         Okay. Focusing on the time that you
             MS. CAPPEL:
8
   were a lieutenant and Straub had been hired, was there an
   occasion where Chief Straub acted inappropriately specific
 9
   to you, in your view?
10
11
             MR. CUMMINGS: As a lieutenant, no.
12
             MS. CAPPEL: So you were a captain at the time --
13
             MR. CUMMINGS: I was a captain, actually, out of
14
  grade, initially in June of 2013. And actions that I felt
   were inappropriate occurred almost six months later at a
  CompStat meeting.
16
17
             MS. CAPPEL: So we're talking about the fall of
18
  2013?
19
             MR. CUMMINGS: Fall or winter, yeah. It was late
20
   2013.
21
             MS. CAPPEL: And CompStat meetings happened how
22
   often?
23
             MR. CUMMINGS: At the time, once a week. Tuesday
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   morning at 7 o'clock.
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             MS. CAPPEL: And the people who attend that
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meeting included Spokane police personnel and people from outside?

MR. CUMMINGS: Yes, multiple agencies outside that we'd partner with.

MS. CAPPEL: And what happened at this particular CompStat meeting?

MR. CUMMINGS: The way they were set up at the time -- and this has been an evolving process. But each one of the precincts would report on the crime in -- in their particular area of responsibility, what they were doing about it and what the results were and what their plan was going forward. Those, basically, were the four principles of CompStat.

And so the reporting period for CompStat information was from Saturday until Saturday. Typically what would happen is, sometimes even over the weekend, I would be reviewing what is going on. When I came into the office on Monday, I would review events over the weekend. So when it came time for my presentation on Tuesday, I had already noticed a significant increase in some crimes that had occurred in the Emerson-Garfield area.

Anyway, I -- I did a very poor job of communicating this, because, basically, what I had said -- and I -- I -- this is not verbatim. It's just the best of my recollection -- is, I had made a statement about how

these particular property crimes had occurred in this area and that next week's CompStat report would show an increase. And what I didn't say was these occurred after the reporting period had ended.

To the best of my understanding, it would appear that Chief Straub interpreted that, that I was predicting crime within that area and didn't have a plan to do anything about it. And I don't recall the exact words, but it was a public evisceration about how incompetent I was and I didn't know what I was doing and this is not the way we're supposed to do business et cetera, et cetera.

The -- the long and short of it was, after the meeting, I had a number of the federal officers, as well as the other guys in the department, kind of, patting me on the shoulder saying, "Wow, sorry about that." And it was. I mean, it was embarrassing, but my frustration was, I didn't even feel -- I didn't even feel I could say, "Chief, these occurred after the reporting period. They already happened. I'm not predicting them."

MS. CAPPEL: So no opportunity to explain.

MR. CUMMINGS: No. I -- I had -- I think we all learned very quickly that you did not -- you didn't offer an opposing opinion to Frank Straub or you were screamed and yelled at. It was very -- it was the first time I've ever experienced this in my 33 years wearing a badge.

MS. CAPPEL: I was going to ask you whether you'd ever had that kind of experience with prior chiefs.

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MR. CUMMINGS: I -- I have had different -differing opinions of multiple chiefs, and it -- and it is 5 just that. It's just an opinion. Have you thought about it this way? I think most of us in the leadership positions 7 learned very early on that you did not offer an opposing 8 opinion. And it was -- it was interesting because if you -if people did -- and I am -- I'm -- I'm probably going off 10 base here -- but there seems to be a pattern with those that offered opinions on where they ended up within the next six 12 months.

I mean, one only has to look at the assistant chief stepping down. a captain stepping down, another captain being removed. I mean, it just one after another after another. That's why I thought initially my assignment to the administrative spot was -- was because I had dared offer an opposing opinion.

It didn't turn out that way. But on this particular time -- and this was a long time ago. I don't want to --

MS. CAPPEL: It's over two years ago now.

MR. CUMMINGS: Yeah. I don't want to sound like I'm all bent out of shape over it. It was, like, water under the bridge at this point. But Mary Murmatsu had come

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to me shortly after, and -- and said, "I think what happened
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   to you was absolutely ridiculous, " and -- and she had
 2
 3
   indicated she was going to talk to somebody about it.
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             MS. CAPPEL: Mary was at the CompStat meeting?
 5
             MR. CUMMINGS: Yes, she was.
             MS. CAPPEL: Did she say who in particular she was
 6
 7
   going to talk to?
 8
             MR. CUMMINGS: I think Nancy Isserlis, but I'm not
 9
          I just recall her saying that she is -- she was going
   to talk to somebody about it. I didn't know if that meant
10
11
   Nancy or Theresa Sanders or -- didn't ask.
12
             MS. CAPPEL: But Mary made it clear that she
   thought Straub's behavior was inappropriate?
13 I
             MR. CUMMINGS: Yes, very clear.
14
15
             MS. CAPPEL: Had anything like that happened with
   Chief Straub before that particular CompStat meeting?
16 l
17
             MR. CUMMINGS: Not with me particularly. And not
18
   that I'm -- I'm aware of. Again, I was fairly new into that
19 l
   command position, so...
20
             MS. CAPPEL: And did Nancy Isserlis ever talk to
   you about this --
21
22
             MR. CUMMINGS:
                           No.
23
             MS. CAPPEL: -- the CompStat meeting we've been
24
   talking about?
25
             MR. CUMMINGS:
                            No.
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1 MS. CAPPEL: Did Chief Straub ever revisit that meeting? 2 3 MR. CUMMINGS: Yes. About a day and a half later, I got called into his office, and he apologized for his 4 5 behavior. 6 MS. CAPPEL: Did he say what prompted his apology? 7 MR. CUMMINGS: No. And it was just my opinion at 8 the time, but it -- it seemed to me that he was asked to do 9 that, because I could see that it was -- it pained him to apologize. 10 11 Was there anyone else present? MS. CAPPEL: 12 MR. CUMMINGS: No. No. 13 MS. CAPPEL: Just the two of you? 14 MR. CUMMINGS: Just the two of us. 15 MS. CAPPEL: Have you shared that meeting that we've been talking about with anyone other than Mary 16 Murmatsu, in terms of members of the City Attorney's Office 17 18 or members of the mayor's administration? 19 MR. CUMMINGS: No, not that particular meeting. But it was pretty obvious to me that others throughout the 20 department had talked about it, because it was actually 21 common knowledge -- and this is just my opinion -- but it 22 was -- I had multiple -- multiple people throughout the 23 agency talk about the -- the public humiliation of Keith 24

Cummings by Chief Straub. I mean, it was --

1 MS. CAPPEL: So --2 MR. CUMMINGS: A lot of people knew about it, 3 yeah. 4 MS. CAPPEL: Okay. Did you ever talk to anyone in 5 HR about this --6 MR. CUMMINGS: No. 7 MS. CAPPEL: -- particular meeting? 8 MR. CUMMINGS: No. 9 MS. CAPPEL: Did it ever happen again? 10 MR. CUMMINGS: Not to the degree of that -- that 11 first one. I mean, CompStat became, well, the -- the 12 uncomfortable two hours of Tuesday morning. I mean, it was 13 almost for me -- and I know the other guys, probably felt the same way -- it was a sigh of relief when the -- the 14 meeting was over, because the -- the beatings were done, so to speak. 16 And I get -- I get his role, what he was trying to 17 18 The problem was, the man was never a cop, and he was 19 trying to tell a bunch of cops how to do their job. And it just became a pulpit for him to talk about how great he was. 20 Again, this is just my opinion of it. It was -- so you just 21 22 shut your mouth and let -- let it go on. But it was never -- it was never to the degree of that first one. 23 I mean --

> MS. CAPPEL: Where it was personalized.

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MR. CUMMINGS: It was very personalized.

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   that, it was just, in my opinion, very poor management
 2
   style.
 3
             MS. CAPPEL: Did Mary attend those CompStat
   meetings on a regular basis?
 4
 5
             MR. CUMMINGS: I -- I remember seeing her at
 6
   multiple ones. I don't think that she attended every single
7
   one, but...
8
             MS. CAPPEL: Did anyone else from the City
 9
   Attorney's Office attend those meetings?
10
             MR. CUMMINGS: I don't think so. I remember
11
   seeing the mayor there at a few of them, but not all of
  them, you know.
12 l
13
             MS. CAPPEL: How about Theresa Sanders; do you
  recall if she attended any?
14
15
             MR. CUMMINGS: I don't recall seeing her, though.
   She might have been at one or two. But -- but I didn't make
16
17 I
   every single one of them, either, so...
18
             MS. CAPPEL: Okay. Were you generally familiar
19 l
   with Monique Cotton?
20
             MR. CUMMINGS: Yes.
21
             MS. CAPPEL: Did you ever work with her?
22
             MR. CUMMINGS: I mean, insofar as coordinating
  press releases for various things.
23
24
             MS. CAPPEL: Did you ever have the chance to
   observe her interactions with Chief Straub?
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             MR. CUMMINGS:
                            Not outside of -- of just a regular
   meeting where things were just being discussed or --
 2
 3
             MS. CAPPEL: In a group setting?
             MR. CUMMINGS:
 4
                            Yeah.
 5
             MS. CAPPEL: Did you learn, at some point, that
 6
   she had made sexual harassment allegations against the
 7
   chief?
 8
             MR. CUMMINGS: Yes, and that was probably about
 9
   the time it came out in the news.
10
             MS. CAPPEL: Did you see any behavior from Chief
   Straub that you would consider to be sexually harassing,
11
12
   meaning inappropriate touching?
13
             MR. CUMMINGS:
                            No.
14
             MS. CAPPEL: Inappropriate comments about physical
15
  appearance?
16
             MR. CUMMINGS:
                            No.
17
             MS. CAPPEL: Attempts to kiss a female employee?
18 Did you see any of that?
19
             MR. CUMMINGS:
                            No.
20
             MS. CAPPEL:
                         Did you become aware of any female
   staff in the Spokane Police Department that had issues with
21
   how they were being treated by Chief Straub?
22
23
             MR. CUMMINGS: No, not until after this came out
24
   in the news.
25
             MS. CAPPEL: So it all --
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1 MR. CUMMINGS: The only -- the only thing I did see, and I never asked for details, is going into Monique's 2 3 office, and it was -- obviously, she was crying. And when I asked if everything was okay, all she did was point in the 5 direction of Chief Straub's office. Never got any details, but she wasn't offering anything anyway. 6 7 MS. CAPPEL: And can you place that in a year that 8 that --9 MR. CUMMINGS: That would have been 2000 -- yeah, late '14 to early '15. I couldn't give you an exact date, 10 11 because it occurred on more than one occasion. 12 MS. CAPPEL: Where you saw her in tears? MR. CUMMINGS: Yeah. But at least twice, maybe 13 even three different times. 14 15 MS. CAPPEL: And did she indicate, on each of 16 those occasions, that it had to do with Straub? 17 MR. CUMMINGS: Just specifically one time, when --18 and she didn't say his name. She just -- I had just asked what's going on, and she points to his office. 20 MS. CAPPEL: Okay. Are you aware of any female staff going outside the department to complain about Chief 21 Straub with each -- with either HR, the City Attorney's 22 Office, or the mayor's staff? 23 24 MR. CUMMINGS: Any female?

MS. CAPPEL: Any female staff from the police

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1
   department.
 2
             MR. CUMMINGS: Not that I'm aware of.
 3
             MS. CAPPEL: Are you aware of any male employees
   from the department going outside to complain about Straub?
 5
             MR. CUMMINGS: Outside -- outside the department,
 6
   no.
 7
             MS. CAPPEL: Okay. Did anyone from the mayor's
   administration reach out for you to ask you about Chief
 8
 9
   Straub or see if you had any concerns?
10
             MR. CUMMINGS:
                            No.
11
             MS. CAPPEL: How about HR or the City Attorney's
12
   Office?
13
             MR. CUMMINGS:
             MS. CAPPEL: I want to turn to the letter that I
14
15
  had put in front of you.
16
             MR. CUMMINGS: Yeah.
17
             MS. CAPPEL: And it's dated September 18th, 2015.
18
             MR. CUMMINGS: Uh-huh.
19
             MS. CAPPEL: And it's a letter that was under the
20
   signature of the leadership of the Captain and Lieutenants
   Association.
21
22
             MR. CUMMINGS:
                           Yes.
23
             MS. CAPPEL: You've seen the letter before?
24
             MR. CUMMINGS:
                            Yes.
25
             MS. CAPPEL: Did you have any role in drafting it?
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MR. CUMMINGS: 1 No. MS. CAPPEL: Did you have a chance to read the 2 3 final after it was finalized? 4 MR. CUMMINGS: Yes. My problem is, I don't recall 5 what exact date I read it. Yeah. But it was definitely after this meeting. 6 7 MS. CAPPEL: The meeting that's referenced in the 8 letter? 9 MR. CUMMINGS: Yes. 10 MS. CAPPEL: So when you read the letter, the 11 final letter, did you have any disagreement with what's in 12 it? 13 MR. CUMMINGS: 14 MS. CAPPEL: Did it cause you any concerns? 15 MR. CUMMINGS: No. I think at this point, all of us were so fed up with this -- this style, this -- this 16 17 chief of police, that it was driving everybody away. 18 mean, it was the antithesis of what a leader should be. 19 MS. CAPPEL: Okay. 20 MR. CUMMINGS: Yeah. 21 MS. CAPPEL: So the letter talks about a meeting on September 8th with members of the association and Theresa Sanders and the mayor. Did you attend that meeting? 23 24 MR. CUMMINGS: Yes, I did.

MS. CAPPEL: Can you tell me what you recall about

it?

MR. CUMMINGS: The meeting was set up. I think, initially, it was to talk about labor issues, because the mayor and the city manager were, actually, kind of, surprised. When Mark Griffiths, who, I believe, signed this letter as well, started talking about some concerns that the lieutenants and captains had regarding Chief Straub's performance and management style, and specifically what had occurred at a senior staff training, I believe it was --

MS. CAPPEL: An in-service?

MR. CUMMINGS: -- at the academy -- yeah, just a week or so before this meeting, and throughout -- throughout this meeting, it almost went around the room regarding very specific details from the various lieutenants and/or captains on their interaction with Frank Straub. I could not go into detail on every single one.

I don't have that kind of memory. But basically, it was a very loud voice from everybody in the lieutenants and captains -- I think only one or two people even missed the meeting -- saying, this has got to stop. This kind of treatment by our chief has got to stop, Mr. Mayor.

And afterwards, after the mayor left -- and the mayor was, actually, really surprised to hear about it. He seemed genuinely surprised. After the meeting, I spoke -- there was about five or six of us that stayed after and --

and spoke with Theresa Sanders for a few minutes, and then that was it.

15 l

MS. CAPPEL: Did you share any of your experiences at the meeting?

MR. CUMMINGS: No. Actually, my -- my public thrashing, if you want to call it that, was actually shared by Captain Torok. Yeah.

MS. CAPPEL: Did -- how -- how did Theresa react to the information, as far as you could tell?

MR. CUMMINGS: I think also she was very surprised. Matter of fact, she had said something like, "Wow. I never expected to hear anything like this," or words to that effect.

MS. CAPPEL: Was there any discussion, either from Theresa or the mayor, about what they planned to do with the information?

MR. CUMMINGS: At that -- at that point, no. We just -- I think -- again, the -- the message was, you've got to talk to this guy, and you've got to do something about this. I don't recall hearing any specific plan by either one of them about what they were going to do.

MS. CAPPEL: Do you recall any discussion or any questions to the members about whether they thought the -- the problems could be fixed with Straub, whether the relationships could be repaired?

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1
             MR. CUMMINGS: That I don't recall. I don't
   remember any specific, like, I know we're going to try to do
 2
 3
   this first or try to do that.
 4
             MS. CAPPEL: Do you remember anyone saying that
 5
   they didn't think Straub could recover from -- from these
 6
   problems?
 7
             MR. CUMMINGS: No, I don't.
8
             MS. CAPPEL: You don't recall that?
 9
             MR. CUMMINGS: Yeah. I don't remember those
   specific words. I think, again, we were just fed up.
10
11
             MS. CAPPEL: Did -- do you recall if Theresa
12
   offered to meet privately with members of the association
13
   after the group meeting?
             MR. CUMMINGS: I think there was something along
14
15
   those lines, but I don't remember anybody that actually took
   her up on that.
16
17
             MS. CAPPEL: Did you?
18
             MR. CUMMINGS: No, I didn't.
19
             MS. CAPPEL:
                         Okay. Do you recall anyone speaking
20
   up in support of Chief Straub during that September 8th
   meeting?
21
22
             MR. CUMMINGS: Boy, I'm -- I'm trying to remember
   if there was any -- my problem is, is I've actually said a
23
   number of times, there was some very good things that --
24
25
  that Chief Straub did, but there was some very bad things.
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And to keep them straight in my mind, okay, now,
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   did I hear that at that meeting or not, I'm -- I'm just not
 2
 3
   sure, because, you know, it's true. He did a lot of good
   things, but then he did some very poor things, so...
 5
             MS. CAPPEL:
                         Okay. Do you recall if Monique
   Cotton came up as a subject at the September 8th meeting?
 6
7
             MR. CUMMINGS:
                           Oh, I believe so, but I don't
8
   remember exactly what he was -- what the words --
 9
             MS. CAPPEL:
                         What the context?
10
             MR. CUMMINGS: Yeah.
                                   Yeah.
11
                         Do you recall whether it had any --
             MS. CAPPEL:
12
             MR. CUMMINGS:
                           Like favoritism regarding a car
   crash. I know that was discussed at -- or car damage and
13
14
   nothing done, that sort of thing. That had to do
15
   specifically with Captain Torok and Lieutenant Walker, I
   believe.
16
             MS. CAPPEL:
                         Do you recall anything coming up
17
18
   along the lines that she had made complaints of sexual
19
   harassment against the chief?
20
             MR. CUMMINGS:
                           At the September 8th meeting, I
   don't recall that being said. We had -- we had -- no, just
21
   the stuff that was in the news, you know.
23
             MS. CAPPEL:
                         That's what you're thinking?
24
             MR. CUMMINGS:
                            Yeah.
                                   That -- I'm trying to --
25
   it's kind of hard to keep the two separate now. When did I
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-- when did I first read about this, so...
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                          So you recall if Carly Cortright came
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             MS. CAPPEL:
 3
   up in the September 8th meeting for any reason?
 4
             MR. CUMMINGS:
                           She might have, but again, the
 5
   context of which I don't remember.
 6
             MS. CAPPEL: Okay. How did you learn that Chief
 7
   Straub had resigned?
8
             MR. CUMMINGS: I believe on the news, yeah.
 9
             MS. CAPPEL:
                         Were you contacted by Theresa between
   the September 8th meeting and the time you learned that
10
11
   Straub had resigned?
12
             MR. CUMMINGS:
                           No.
13
             MS. CAPPEL: Did anyone from the City Attorney's
   Office contact you between that period?
14
15
             MR. CUMMINGS:
             MS. CAPPEL: Anyone from HR?
16
17
             MR. CUMMINGS:
                            No.
18
             MS. CAPPEL: Were you familiar with the
   circumstances around Carly Cortright transferring from the
   police department to City Hall?
20
21
             MR. CUMMINGS: Not exactly at the time she left. I
   learned more and more after time had gone by. But
   as I mentioned before, she was one of the persons that had
23
   told Frank Straub that he might be wrong, and suddenly, she
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25

was gone.

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MS. CAPPEL: Did you attend some of these meetings
 1
   where Carly pushed back?
 2
 3
             MR. CUMMINGS: No. And I -- I have to square that
   away. This is in conversations with her. And I think both
 5
   Brad Arleth and Joey Walker were commanders at the time that
   Carly was there. And so this is like conversations that
   might have occurred either in passing. I remember talking to
8
   Carly about it a couple of years ago, like, "Why did you
9
   suddenly leave?"
10
             MS. CAPPEL: Uh-huh.
11
             MR. CUMMINGS: That sort of thing, so...
12
             MS. CAPPEL: And she said?
13
             MR. CUMMINGS: "Tough guy to deal with." Yeah.
14
             MS. CAPPEL: Okay.
15
             MR. CUMMINGS: Yeah.
16
             MS. CAPPEL: Did Straub ever speak disparagingly
   about Carly in your presence?
17 I
18
             MR. CUMMINGS: No, not in my presence. I remember
   hearing conversations from either Brad or Joey where she was
20
   mentioned.
21
             MS. CAPPEL: By the chief?
22
             MR. CUMMINGS: Yeah. They had talked about the
   chief talking about her. And I said, "This is starting to
23
   get way down the pipeline, " so ...
24
```

MS. CAPPEL: Okay. But you never heard him make

```
any disparaging comments?
 1
 2
             MR. CUMMINGS: Not to me personally, no.
 3
             MS. CAPPEL: How about any disparaging comments
   about women in the department; did Straub make any of those
 5
   in front of you?
 6
             MR. CUMMINGS: Not -- not that I recall, no.
 7
             MS. CAPPEL: Okay. I'm going to go off the record
 8
   and check my notes.
 9
             MR. CUMMINGS:
                            Okay.
10
             (Brief recess.)
11
             MS. CAPPEL: We're back on the record, and I have
12
   gone through my list of questions. Keith, do you have
   anything you want to add or any questions before we go off
13
14
   the record?
15
             MR. CUMMINGS: Nope.
16
             MS. CAPPEL: All right. Thank you.
17
             MR. CUMMINGS: Perfect. Thank you.
18
             MS. CAPPEL: It is 12:29.
              (WHEREUPON, the interview of Keith Cummings was
19
20
   concluded.)
21
22
23
24
25
```

1	CERTIFICATE
2	
3	I, Marilyn J. Broyles, do hereby certify
4	that I reported all proceedings adduced in the foregoing
5	matter and that the foregoing transcript pages constitutes
6	a full, true and accurate record of said proceedings to
7	the best of my ability.
8	
9	I further certify that I am neither related
10	to counsel or any party to the proceedings nor have any
11	interest in the outcome of the proceedings.
12	
13	IN WITNESS HEREOF, I have hereunto set my
14	hand this 20th day of June, 2016.
15	
16	- A chamalan-
17	Marilyn Stroyles
18	
19	Marilyn J. Broyles
20	
21	
22	
23	
24	
25	

1	CORRECTION SHEET					
2	Deposition of: Keith Cummings Date: 05/24/16					
3	Regarding: Frank Straub					
4	Reporter: Broyles					
5						
6	Please make all corrections, changes or clarifications					
7	to your testimony on this sheet, showing page and line					
8	number. If there are no changes, write "none" across					
9	the page. Sign this sheet on the line provided.					
10	Page Line Reason for Change					
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24	Signature					
25	Keith Cummings					



1	DECLARATION			
2	Deposition of: Keith Cummings Date: 05/24/16			
3	Regarding: Frank Straub			
4	Reporter: Broyles			
5				
6				
7	I declare under penalty of perjury the following to			
8	be true:			
9				
10	I have read my deposition and the same is true and			
11	accurate save and except for any corrections as made			
12	by me on the Correction Page herein.			
13				
14	Signed at,,			
15	on the, 2016.			
16				
17				
18				
19				
20				
21				
22				
23				
24	Signature			
25	Keith Cummings			



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