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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 17-CV-00884-CMA-STV

DEPOSITION OF: KIM COCHRAN - March 15, 2019

CHAYCE AARON ANDERSON,

Plaintiff,

v.

JASON SHUTTERS,

Defendant.

PURSUANT TO NOTICE, the deposition of KIM COCHRAN was taken on behalf of the Plaintiff at 2221 South Timberline Road, Fort Collins, Colorado 80525, on March 15, 2019, at 9:33 a.m., before Lisa B. Kelly, Registered Professional Reporter, Certified Realtime Reporter, and Notary Public within Colorado.



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Movant's Appx. 043

1 MR. RATNER: -- so we're not talking over
2 each other.

3 THE DEPONENT: Okay.

4 MR. RATNER: And the second thing is, if
5 I make an objection, you can go ahead and answer
6 unless I say "Don't answer."

7 THE DEPONENT: Okay. I'm used to court,
8 where if somebody objects, nobody says anything until
9 somebody gets a ruling. Okay.

10 MR. RATNER: I'm objecting to form
11 because "technique" is very wide and broad, so . . .

12 THE DEPONENT: Okay. Do you want me to
13 answer anyway?

14 MR. RATNER: Yeah. Yeah. The question
15 pending, go ahead.

16 A. So there are multiple schools of
17 training, and each of those has its own forms. Within
18 each of those schools of training, there are a
19 multitude of ways to do handcuffing.

20 The particular one that we subscribe to
21 here, there are at least three or four methods for
22 doing handcuffing. In addition to standing, kneeling
23 and prone, there are different kinds in each of those
24 positions.

25 So -- but the ones that are used most

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 17-CV-00884-CMA-STV

DEPOSITION OF: JASON SHUTTERS - March 13, 2019

CHAYCE AARON ANDERSON,

Plaintiff,

v.

JASON SHUTTERS,

Defendant.

PURSUANT TO NOTICE, the deposition of JASON SHUTTERS was taken on behalf of the Plaintiff at 2221 South Timberline Road, Fort Collins, Colorado 80525, on March 13, 2019, at 8:29 a.m., before Lisa B. Kelly, Registered Professional Reporter, Certified Realtime Reporter, and Notary Public within Colorado.



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Movant's Appx. 045

1 we stop.

2 MR. JORDAN: Okay.

3 (At this time an audio recording was
4 played.)

5 Q. (BY MR. CASOLARO) Okay. At 2:57 to --

6 MR. JORDAN: 3:05.

7 Q. (BY MR. CASOLARO) -- that's when you
8 initiated the physical arrest of Mr. Anderson?

9 A. Yes.

10 Q. Is that fair? Okay.

11 A. And can I correct my previous -- so I
12 originally -- it wasn't until I heard this again that
13 I realized my recollection of how I arrested him was
14 wrong.

15 So I said twist and lock, just because
16 that's what I had in my head. And then when I heard
17 him -- when I heard myself say, Put your hands behind
18 your head, I just realized, it was, like, I didn't do
19 a twist and lock. I did a standing cuff.

20 So it starts, he turns away, puts his
21 hands behind his head, interlaces his fingers, and
22 then I take ahold of his hands and put one behind his
23 back while I search -- begin searching him, and then I
24 handcuff him from that point.

25 Q. And what did you say was the name of that



1 method?

2 A. Stand and cuff.

3 Q. Stand and cuff. And under what
4 circumstances do you normally use that method, versus
5 the twist and lock?

6 A. Those two, for me, are pretty
7 interchangeable. For -- standing cuff is, I would
8 say, just a little bit more secure. Sometimes the
9 twist and lock, you're relying on the other person's
10 pain complaints, for lack of a better term.

11 When you do the twist, sometimes it
12 works, sometimes it doesn't. And other people, you
13 know, when they feel that, it freaks them out, and
14 they try and twist out of it and sometimes hurt
15 themselves a little bit more or don't feel the pain
16 compliance, and if they're resistive, it takes a
17 little more effort to get them compliant again.

18 Q. Okay. Do you recall specifically why you
19 used the stand and cuff in this instance?

20 A. No. I mean, he was there. Told him to
21 turn around and place his hands behind his -- that's
22 just kind of where it went, so . . .

23 MR. CASOLARO: All right. Can you go to
24 3:22?

25 MR. JORDAN: Okay. For the record, the



1 MR. JORDAN: The audio is starting again
2 at 4:31.

3 (At this time an audio recording was
4 played.)

5 MR. JORDAN: The audio was stopped at
6 4:39.

7 Q. (BY MR. CASOLARO) Do you know what that
8 last set of cranking was --

9 A. So that was --

10 Q. -- or what that sound was?

11 A. So that's me checking the cuffs for
12 tightness. And one was a little bit too loose, so it
13 sounded like there was, what, two more clicks in
14 there, as I was asking him if either one of those were
15 too tight.

16 Q. (BY MR. CASOLARO) Okay. And by this
17 point had you double-locked?

18 A. I think I'm getting ready to.

19 MR. JORDAN: Playing the audio at 4:39.

20 (At this time an audio recording was
21 played.)

22 MR. JORDAN: And the audio was paused at
23 4:52.

24 A. Yeah. So that's when I was
25 double-locking it.

