

**CUMULATIVE**  
**EXHIBIT H**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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ELAINE BLANCHARD, KEEDRAN  
FRANKLIN, PAUL GARNER, and  
BRADLEY WATKINS,

Plaintiffs,

and

ACLU OF TENNESSEE, INC.,

Intervenor-Plaintiff,

vs.

No. 2:17-cv-02120-JPM-dkv

THE CITY OF MEMPHIS,

Defendant.

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Deposition of:

ALBERT BONNER

Taken on behalf of the Intervenor-Plaintiff  
April 24, 2018

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Elite Reporting Services  
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Julie T. White, LCR(TN), CCR(MS)  
Memphis, Tennessee  
(901)522-4477

1 the mayor's house. 09:20:45

2 Q. And the die-in just so the record is clear, 09:20:46

3 what was that? 09:20:50

4 A. A group of individuals went to the mayor's 09:20:50

5 home, laid in his front yard. Called it a die-in. 09:20:53

6 They did a Facebook live video. They knocked on his 09:20:56

7 door. They peeked through his window one morning 09:21:00

8 before work. 09:21:04

9 Q. Were you present while this was going on? 09:21:05

10 A. No. 09:21:08

11 Q. Were there arrests made at the die-in? 09:21:10

12 A. No, sir. 09:21:14

13 Q. Did you feel out this first page we're 09:21:15

14 looking at? Is this handwriting yours? 09:21:19

15 A. Yes. It's my handwriting. 09:21:21

16 Q. Okay. So, and this was an authorization of 09:21:23

17 agency specifically for this property address listed 09:21:27

18 at 267 Ridge Field, correct? 09:21:33

19 A. Yes. 09:21:35

20 Q. And that's the property where the die-in took 09:21:36

21 place? 09:21:40

22 A. Yes. 09:21:40

23 Q. And that's the mayors -- I don't know 09:21:41

24 Memphis. Is that the mayor's personal residence, or 09:21:43

25 does the mayor live in a city home? 09:21:45

1 Q. Okay. What about the list, the couple of 09:52:49  
2 pages before the list of, I believe, you described 09:52:59  
3 them as the Valero protestors? 09:53:02  
4 A. Is there a -- 09:53:05  
5 Q. Is this still in effect at City Hall? 09:53:09  
6 A. No. 09:53:13  
7 Q. And then the Authorization of Agency is still 09:53:14  
8 in effect at the mayor's house but not at City Hall? 09:53:16  
9 A. Yes, sir. 09:53:19  
10 Q. Okay. And who made that decision? Was that 09:53:20  
11 your decision or someone else's? 09:53:30  
12 A. There was a discussion made among several 09:53:32  
13 people over me. 09:53:36  
14 Q. Okay. So you were told this is how it's 09:53:37  
15 going to be at City Hall? 09:53:41  
16 A. Yes. 09:53:42  
17 Q. Okay. Do you recall when the, when the 09:53:43  
18 individuals were removed from the City Hall list, do 09:53:51  
19 you recall when that happened? 09:53:56  
20 A. No, I don't. 09:53:58  
21 MR. CASTELLI: Let's mark this as 09:54:25  
22 Exhibit 5. 09:54:34  
23 (WHEREUPON, the above-mentioned document 09:54:34  
24 was marked as Exhibit Number 5.) 09:54:39  
25 Q. Lieutenant Bonner, do you recognize this 09:54:39

1 Q. Did you have any conversations about removing 09:51:06  
2 people from the list? 09:51:16  
3 A. No, sir. 09:51:19  
4 Q. Are the people who are on the Authorization 09:51:19  
5 of Authority for the mayor's home, are they still 09:51:29  
6 part of this escort-only list at City Hall? 09:51:32  
7 A. There's no longer a list. 09:51:37  
8 Q. I'm sorry? 09:51:39  
9 A. At his home? 09:51:40  
10 Q. Yeah. The folks that are included on the 09:51:41  
11 Authorization of Authority for the mayor's home, are 09:51:46  
12 they still to be escorted if they come to City Hall? 09:51:48  
13 A. There is -- 09:51:52  
14 MR. WELLFORD: Go ahead. Go ahead. 09:51:52  
15 A. There is an Authorization of Agency at his 09:51:54  
16 home. 09:51:59  
17 Q. Yeah. 09:51:59  
18 A. But there is no longer a list for City Hall. 09:52:00  
19 Q. Okay. Let's look back at Exhibit 1. That 09:52:04  
20 last two pages, the City Hall escort list. 09:52:14  
21 Is this escort list still in effect? 09:52:40  
22 A. For employees? 09:52:43  
23 Q. Employees. Or people who have been arrested 09:52:44  
24 doing something at City Hall? 09:52:48  
25 A. Yes. 09:52:49