

Deposition of Kenneth Willers taken 11/20/14

1 UNITED STATES DISTRICT COURT
 2 DISTRICT OF MINNESOTA
 3
 4
 5 File No. 13-CV-266
 6 -----
 7 Forest Olivier et al.,
 8 Plaintiffs,
 9
 10 vs.
 11 Karl Willers et al.,
 12 Defendants.
 13 -----
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 17 DEPOSITION OF KENNETH WILLERS, taken pursuant
 18 to Notice of Taking Deposition and taken before Debra J.
 19 Mokszycke, a Notary Public in and for the County of Anoka,
 20 State of Minnesota at 222 South Ninth Street, Suite 2200,
 21 Minneapolis, Minnesota, on the 20th day of November, 2014,
 22 commencing at approximately 2:35 p.m.
 23
 24
 25

3

1 APPEARANCES:
 2 NATHAN M. HANSEN, Attorney at Law, HANSEN LAW
 3 OFFICE, 2440 North Charles Street, Suite 242, North St. Paul,
 4 Minnesota, 55109, appeared representing the Plaintiffs.
 5
 6 ALAN C. MILSTEIN, Attorney at Law, SHERMAN,
 7 SILVERSTEIN, KOHL, ROSE & PODOLSKY, P.A., 308 Harper Drive,
 8 Suite 200, Moorestown, New Jersey, 08057, appeared representing
 9 the Plaintiffs.
 10
 11 JOHN M. BAKER and JANINE WETZEL KIMBLE,
 12 Attorneys at Law, GREENE ESPEL, PLLP, 222 South Ninth Street,
 13 Suite 2200, Minneapolis, Minnesota, 55402-3362, appeared
 14 representing Defendants Nicholas Jacobson and the Olmsted
 15 County Sheriff's Office.
 16
 17 NATHAN C. MIDOLO, Attorney at Law, IVERSON,
 18 REUVERS, CONDON, 9321 Ensign Avenue South, Bloomington,
 19 Minnesota, 55438, appeared representing Defendants Karl
 20 Willers, the Hutchinson Police Department, Kenneth Willers, the
 21 Nobles County Sheriff's Office, Daniel Lewis, Steve Schulz, the
 22 Kanabec County Sheriff's Office, Michael Hadland and the
 23 Fillmore County Sheriff's Office.
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1 HELEN R. BROSNAN, Assistant County Attorney,
 2 DAKOTA COUNTY JUDICIAL CENTER, 1560 Highway 55, Hastings,
 3 Minnesota, 55033-2392, appeared representing Defendant Bryce
 4 Schuenke and Dakota County.
 5
 6 ANDREW T. JACKOLA, Assistant County Attorney,
 7 GOVERNMENT CENTER, 2100 Third Avenue, Suite 720, Anoka,
 8 Minnesota, 55303-5025, appeared representing Defendant Chris
 9 McCall and the County of Anoka.
 10
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 12 - - -
 13 WHEREUPON, the following proceedings were duly had:
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1 KENNETH WILLERS,
2 After having been first duly sworn,
3 testified under oath as follows:
4
5 EXAMINATION
6 BY MR. MILSTEIN:
7 Q You're a deputy; is that correct?
8 A No, a Minnesota state trooper.
9 Q Okay. I'm Al Milstein. I represent the plaintiffs in this
10 case. I'm going to ask you some questions. Just stop me
11 if at any time you don't understand the question and I'll
12 try to rephrase it. Just make sure all your answers are
13 verbal, so the court reporter can take those down. Okay?
14 A Okay.
15 Q When you went through the DRE program, you were a police
16 officer in Nobles County; is that right?
17 A I was a deputy in Nobles County, yes.
18 Q What's the difference between a deputy and police officer?
19 A A deputy is assigned to a county and just works that county
20 or that department. As a state trooper, I can work
21 anywhere in the state, but I have a district where I work
22 out of.
23 Q Were you employed by the state or by the county?
24 A The county, at that time.
25 Q So were you a member of the county police department?

6

1 A The sheriff's department.
2 Q The sheriff's department?
3 A Yep.
4 Q Of the county?
5 A Yes.
6 Q And your brother Karl, he was a police officer in
7 Hutchinson?
8 A Yes.
9 Q How is it that you were in different counties?
10 A That's just where he moved after college when he got a job
11 and I just kind of stayed in the southwest part of the
12 state.
13 Q Okay. How is it that you both happened to be in the DRE
14 program at the same time? Did you coordinate that with
15 him?
16 A No, we actually -- it came in passing. We started talking
17 and found that we both applied for the DRE school and we
18 both did it without knowing that the other did it.
19 Q And did you not find out until you went to the class the
20 first day?
21 A No, we found out beforehand.
22 Q And so the two of you were in class for the two weeks,
23 right?
24 A Yes.
25 Q And then after the class you were assigned another officer

7

1 and he was assigned another officer, correct?
2 A Yes.
3 Q And who were you assigned?
4 A I was assigned Chris McCall.
5 Q And who was he assigned?
6 A I don't remember his name. Mahowald or --
7 Q Right.
8 A -- something like that.
9 Q Did you and your brother talk about going out and trying to
10 find 12 to 15 people who were impaired on drugs?
11 A What do you mean?
12 Q After the class was over, now it's time to go find
13 drug-impaired people, correct?
14 A Yep.
15 Q You and your partner have to find 12 of them?
16 A Yes. Well, I don't remember -- we had to find, I believe,
17 15.
18 Q 15?
19 A I think you have to do 15 evaluations. I'm not 100 percent
20 sure, but I thought it was 15.
21 Q I had seen 15, but then there was something else that said
22 6 and 6 or a minimum of 12. Did you have any concerns
23 about how you were going to go about finding these people?
24 A Being not from Minneapolis, I had concerns because I didn't
25 know where we were -- I didn't know where anything was,

8

1 what to do, where we were going, anything like that.
2 Q Did you ever give any drugs to any of the people that you
3 evaluated?
4 A No, I did not.
5 Q Did you ever see anybody give drugs to any of the people
6 you evaluated?
7 A No, I did not.
8 Q Did you ever see the people you evaluated take any drugs?
9 A No, I did not.
10 Q You understand that there was someone who said that your
11 brother gave some marijuana to one of the people that his
12 team evaluated, correct?
13 A That's what I've read in the newspapers and stuff.
14 Q Did you ever ask your brother about that?
15 A Nope.
16 Q And he never said anything to you about it?
17 A No.
18 Q Why didn't you ask him about it?
19 A We talked about the actual class and stuff itself, but he's
20 like, I'm not going to talk to you about it, so I said
21 okay.
22 Q At some point in time your brother, at least it was
23 reported in the media, said that 30 to 40 percent of the
24 class members essentially did what he did. Did you ever
25 read that?

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1 A No, I did not.
2 Q Do you know of any other officer or member of that class
3 who gave any drugs to any of the people they evaluated?
4 A As far as I know, just from my experience of being there, I
5 don't -- I don't know of anybody that gave drugs to
6 anybody.
7 Q Including your brother?
8 A Including my brother.
9 Q Did you talk to anybody else, besides your brother, who was
10 in the class about their experience finding people to --
11 A As a group, we had talked to other people that are there
12 just because that's who you're there with for a month, so
13 you get to know them a little better and there was nobody
14 else to talk to, so --
15 Q Where did you stay when you were down here? Are you down
16 here or up here, as far as your --
17 A This is up here, so --
18 Q This is up here? Okay.
19 A Are you talking like a hotel?
20 Q Yeah.
21 A On the north side. The Mermaid, I think is what it's
22 called.
23 Q Did your county pay for that?
24 A Everything was free.
25 Q But do you know who paid the hotel bill?

10

1 A I don't know if it's the state or who it is. Someone pays
2 for it, but not the -- any of the agencies involved do not
3 pay for it.
4 Q And how about your meals?
5 A The meals were paid for by the county.
6 Q And obviously you were still paid your salary by the
7 county, even though you weren't essentially patrolling the
8 county?
9 A Yes.
10 Q Who did you say your partner was?
11 A Chris McCall.
12 Q All right. So you finished the class, you take the test,
13 and now it's time to go find people. McCall, was he local?
14 A Anoka, I believe.
15 Q Anoka?
16 A (Nodding head.)
17 Q Is that local?
18 A It's around the Cities somewhere.
19 Q So he knew Minneapolis and St. Paul better than you did?
20 A Yes.
21 Q So just tell me how it worked. Did he come and pick you up
22 at your hotel?
23 A No, we had a meeting point at a -- I don't remember if we
24 were at the DOT shop at that point or if we were downtown
25 Minneapolis. I believe we started out downtown Minneapolis

11

1 at a precinct, so we --
2 Q So you met him at the precinct?
3 A Yes.
4 Q Did you have a squad car with you?
5 A He -- his squad car.
6 Q Had you brought a squad car down?
7 A I came up with two other people that --
8 Q Or up.
9 A I came up with two other people that I worked with, so we
10 took our own -- it wasn't a squad, it was an unmarked squad
11 car that we had.
12 Q Okay. But when you went around with your partner to look
13 for people, you were in the squad car?
14 A Yes.
15 Q And it was his squad car?
16 A Yes.
17 Q Are you a uniformed officer or plain clothes?
18 A Yes, uniformed.
19 Q So you were in full uniform?
20 A Yes.
21 Q With firearm?
22 A Yes.
23 Q And handcuffs?
24 A Yes.
25 Q And your partner had full uniform?

12

1 A Yes.
2 Q With firearm and handcuffs?
3 A Yes.
4 Q So I'm just trying to understand how it is that you guys
5 would go find people. So what time did you start?
6 A We started -- the first week, the first day or two that we
7 were -- I think we were only up there for one or two days
8 to start, for the first evaluations, and I don't -- I think
9 it might have been like 6:00 sometime, or 4:00 maybe,
10 somewhere around there.
11 Q So late afternoon or early evening?
12 A Yeah.
13 Q And what did you do?
14 A Drove around, talked to people.
15 Q Drove around Minneapolis or St. Paul?
16 A Minneapolis, I believe.
17 Q And where did you drive?
18 A Just anywhere.
19 Q And who did you talk to? Did you pull over when you saw
20 somebody on the street?
21 A If we were walking or saw somebody that was stumbling or
22 appeared to be intoxicated, then we would step out and talk
23 to them.
24 Q I mean, most people who you would see on the street who
25 were stumbling or intoxicated would be drunk, right?

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1 A Yeah, that's -- most of the people that we came across were
2 drunk.
3 Q And those weren't people you could evaluate?
4 A No.
5 Q And did you understand that -- well, of the 15 that you and
6 your partner evaluated, did you bring them all to the DOT?
7 A Me and my partner only had three actual evals that we got
8 ourselves.
9 Q And where did you get the rest?
10 A The others were people that were brought in by other
11 officers that had been tested by them and then we asked if
12 they were still able to do another test, as we could do
13 more than one test on a person between groups.
14 Q Is it because it was so difficult finding people that
15 that's the way it worked for you?
16 A Yeah.
17 Q And the three people that you actually found, did you bring
18 them to the DOT?
19 A The first lady we did. Actually, she was brought to the
20 Minneapolis precinct because that was the first night that
21 we were there.
22 Q So you started in the Minneapolis precinct and then --
23 A Yeah. I think we were only there for a little bit and then
24 we -- then we moved to the DOT shop.
25 Q So you brought her to the Minneapolis precinct?

14

1 A Yes.
2 Q And what was it about her that caused you to bring her
3 there?
4 A She appeared like she was intoxicated and after -- after
5 talking to her we could definitely tell there was something
6 going on with her and so we -- we had enough that we felt
7 we could bring her in for an eval and she said that she
8 would.
9 Q Did you ask her what she was intoxicated by?
10 A She talked about people shoving cocaine down her nose.
11 Q So she said essentially she was high on cocaine?
12 A That she -- that's what she said. We ended up finding out
13 later that she wasn't.
14 Q Was she high on anything?
15 A No. She just had some mental health issues.
16 Q Did you do an evaluation of her?
17 A Yes.
18 Q And in the evaluation did you conclude she was high on
19 cocaine?
20 A No. We ruled it a medical rule-out rather than any type of
21 intoxication due to drugs.
22 Q And the rule-out wasn't because of the urine toxicology, it
23 was just because she just seemed --
24 A Yeah. We didn't even give her a -- I don't believe we even
25 gave her a urine test.

15

1 Q How about the next person that you brought in?
2 A The next person was actually my partner's wife. She had
3 surgery, some kind of small surgery where she was knocked
4 out and was on a pain med or -- she just came from the
5 hospital. She had a person drive her to the DOT shop so we
6 could do a quick evaluation on her.
7 Q So she was on some kind of pain medication?
8 A She was on some sort of pain medication or the anesthesia
9 that she was put under, yeah, something like that.
10 Q Was it OxyContin or something like that?
11 A I have no idea what it was.
12 Q So that was an easy one to get?
13 A That was an easy one.
14 Q How about the third one?
15 A The third one was -- I believe it was the Brooklyn Park
16 Police Department called us about a traffic stop that they
17 made and arrested a male that they thought was intoxicated,
18 so we drove to the jail with an instructor and did an
19 actual eval for one that could be charged out.
20 Q Because if it was an arrest, you didn't have to bring them
21 to the DOT or --
22 A No.
23 Q -- to the precinct?
24 A Other local departments knew that we were up there and if
25 they stopped someone where they would normally request a

16

1 DRE, they would request the class instead of an actual DRE
2 to help us.
3 Q And what was that person -- what did you determine that
4 person was intoxicated with?
5 A I can't remember.
6 Q Was it an illegal substance?
7 A Yes. I believe he had some of the illegal substance on him
8 in the vehicle also.
9 Q Was it marijuana or something else?
10 A I don't know if it was marijuana.
11 Q So he appeared intoxicated, he was found with a particular
12 drug, so that was fairly easy to determine that he was
13 intoxicated on that drug, right?
14 A It was -- yeah, after he did the test you could clearly
15 tell. I don't remember what he was on.
16 Q But were you told at the time that he was caught with the
17 drug?
18 A That, I don't remember if we were or not. We were just --
19 I believe we were just told that he was found and arrested
20 and they wanted an eval done on him, but I can't
21 remember -- usually we do a preinterview with the officer,
22 so I'm guessing he told us that there was something that
23 was found in the vehicle, but I can't remember for sure.
24 Q All right. And the other 12 that were done that were
25 hand-offs to you and your partner from other officers, what

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1 do you recall about that?

2 A They were just people that came in from other officers. At

3 that point, it started to get kind of late and I was sick

4 of being up there, so I didn't care who it was, I wanted

5 them. I just wanted to get an eval done so we could get

6 out of there.

7 Q Do you remember what drugs the various people were on?

8 A Most of those people were on marijuana.

9 Q Do you recall how long before the evaluation had the person

10 supposedly smoked marijuana? Was there something that the

11 instructors told you, that it was something like -- so if I

12 smoked marijuana today and you approached me tomorrow, that

13 wouldn't work on the evaluation, correct?

14 A No, it would not.

15 Q Did the instructors tell you how long before the evaluation

16 you could expect to see the telltale signs of a person high

17 on marijuana?

18 A I don't believe so. I think a lot with marijuana has to do

19 with how often they use it and that kind of stuff, how long

20 the effects last with them.

21 Q But was it -- I mean, would six hours before be something

22 that would still allow you to do an eval on them?

23 A Six hours, I wouldn't probably do an eval. I don't know if

24 they would show the signs of --

25 Q How about three hours?

19

1 A That name sounds familiar, as I've read articles and stuff.

2 Q But you don't know whether you've evaluated him or not?

3 A I don't recognize that name.

4 Q And you don't remember whether you evaluated the person who

5 had the Afro or not?

6 A No, I just remember seeing him. I don't believe I --

7 Q It was the person you saw in the video?

8 A Yeah. I just remember seeing him. I don't remember if I

9 tested him or not.

10 Q Do you know if your brother was reprimanded as a result of

11 the investigation into the DRE events?

12 MR. MIDOLO: Object to the form of the

13 question. You can answer, if you know.

14 THE WITNESS: I believe he was suspended ten

15 days without pay, something like that.

16 BY MR. MILSTEIN:

17 Q Did he tell you that or is that just something you read?

18 A He told me that.

19 Q Is that the extent of your conversation with him about what

20 had gone on?

21 A About the actual -- whatever he did, yes.

22 Q Do you know where he got the marijuana?

23 A I have no idea.

24 Q Did he ever admit to you that, in fact, he gave the subject

25 marijuana?

18

1 A That could be also. I don't know for sure.

2 Q Did it make a difference how much marijuana they had

3 smoked?

4 A I didn't ask them how much they smoked.

5 Q No, as far as whether it was possible to evaluate the

6 effects of marijuana on this particular person.

7 A I'm assuming -- I have no idea. The only question we asked

8 was are they good enough to do another eval.

9 Q Did you ever ask the question where did you get the

10 marijuana?

11 A No.

12 Q Did any of them tell you that an officer had given them

13 marijuana?

14 A No.

15 Q Do you know whether you evaluated any of the plaintiffs who

16 are in this lawsuit?

17 A I don't know if I did or not. The only person I remember

18 is the -- I remembered him from the video that was on

19 YouTube, the man with the Afro.

20 Q He was called Fro?

21 A I don't know what his -- I just remember him being at the

22 DOT building. I can't remember if I tested him or not.

23 Q Did you ever -- do you know who Forest Olivier is?

24 A I have no idea. That name sounds familiar, as I've read --

25 Q As a what?

20

1 A We never talked about it.

2 Q Never talked about it at all?

3 A No.

4 Q The person that you saw in the video, did you ever approach

5 him anywhere --

6 A No.

7 Q -- when you guys were riding around the streets looking for

8 people?

9 A No, I did not.

10 Q Did you ever go to where Occupy Minnesota was going on?

11 A We went there -- I believe it was the -- I can't remember

12 if it was the last day or the day before the final test.

13 It was -- I already had all my evals done. I heard a lot

14 of people talking about Occupy and I had no idea what that

15 was, and so I was kind of interested in seeing what it was.

16 Q Did you go there in full uniform?

17 A Yes.

18 Q And what was your purpose in going there, just to see what

19 was going on?

20 A I just wanted to see what everyone was talking about.

21 Q And when you say "everyone," you mean everyone in the

22 class?

23 A I had seen stuff in newspapers, media, and then people in

24 the class that had been down there.

25 Q How many people in the class told you they had been down

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1 there?
2 A I have no idea.
3 Q More than one?
4 A Yeah.
5 Q Did anybody in the class tell you that they were taking
6 people from there for the evals?
7 A Yes.
8 Q More than one person told you that?
9 A Yes.
10 Q Did your brother tell you that?
11 A I don't remember who told me that.
12 Q Other than your brother, do you remember who told you that?
13 A No.
14 Q How well did you know the other people in the class?
15 A I knew my brother and a partner of mine and a local city
16 officer very well.
17 Q Let me show you what's been marked as Exhibit 10. At some
18 point in time you were interviewed; is that right?
19 A Yes.
20 Q And is this a copy of your statement?
21 A I've never seen this before.
22 Q Okay. Why don't you take a quick read through that.
23 A Yeah, that sounds about -- that about sums it up.
24 Q So the instructors had told you you could offer them food
25 or cigarettes?

22

1 A Yeah. They said we could offer them anything that we
2 wanted.
3 Q Who said that?
4 A One of the instructors, or multiple. I have no idea.
5 Q You told this interviewer that you don't know of anyone who
6 gave money or drugs, but you thought someone had given some
7 beer?
8 A Yeah. I didn't remember that until I just read it now.
9 Q And is that correct?
10 A If I said it then, then yes.
11 Q And then in the third [sic] paragraph it says: "Woodford
12 asked Deputy Willers if someone had illegal drugs on them
13 if he felt they were allowed to let them use the drugs and
14 then provide a test for the officers for this DRE program.
15 Deputy Willers indicated to SA Woodford and SA Anderson
16 that it seemed perfectly fine if an officer patted someone
17 down and they had drugs on them to give them the option to
18 either use the drug and then go with them or go to jail."
19 Did I read that correctly?
20 A That's what it says here.
21 Q And you have no reason to believe that is not your
22 statement, do you?
23 A No.
24 Q I'm going to have you look at Exhibit 12. So this is the
25 interview of your brother; is that right?

23

1 A It says an interview of me.
2 Q Oh, of you, that's right. This is with you, a much more
3 extended interview. How many times were you interviewed?
4 A Twice.
5 Q Why don't you read, if you can, pages 19 and 20. Have you
6 ever seen the transcript before?
7 A Nope. Read them both?
8 Q Yeah, those two pages.
9 MR. MIDOLO: Just to clarify, do you want --
10 MR. MILSTEIN: Not out loud, just to
11 yourself.
12 MR. MIDOLO: Read it to yourself.
13 THE WITNESS: Okay.
14 BY MR. MILSTEIN:
15 Q So on page 19, similar to the other exhibit, about
16 two-thirds down you say, "Yeah, even before I went up there
17 it seemed like it was okay and perfectly fine if, if you
18 patted somebody down and they had drugs on them to give
19 them the option you can either do this and come with me or
20 you're gonna go to jail."
21 Did I read that, right?
22 A I believe so.
23 Q You have no reason to believe that's not your statement, do
24 you?
25 A No.

24

1 Q And then there's a question: "So was that, was that
2 inferred by the instructors that or is that just people
3 talking that this has been a kind of that's okay to do."
4 And then your answer is, "That's what I, that's what I've
5 heard."
6 Did I read that right?
7 A I believe so.
8 Q So you heard that if an officer approached somebody and
9 they had drugs on them, that it was okay to essentially
10 watch the person take the drugs and then take them in to be
11 evaluated?
12 A Yes.
13 Q And then little bit farther down you say, "There was
14 really, every time I would talk to somebody or someone
15 would talk about their stories I want to say pretty much
16 when you come up to DRE school certifications your morals
17 are gone."
18 Did I read that right?
19 A Yep.
20 Q Do you remember saying that?
21 A Yes.
22 Q And what do you mean by that?
23 A You needed to do anything you could to get your evals
24 done. That's what I was told prior to going up there.
25 Q Told by who?

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1 A Other people that have went through the DRE program.
2 Q So people that had gone through the DRE program before?
3 A Yes.
4 Q Told you that it was essentially common practice to watch
5 somebody take drugs and then evaluate them?
6 A Yes.
7 Q And that when you go to this program, your morals are gone?
8 A That's a statement someone said.
9 Q And you agreed with that?
10 A That's a statement someone said. That's what I was just
11 telling that --
12 Q Yeah, but based on -- based on your experience, you agreed
13 with that?
14 A I never did anything against my morals.
15 Q I'm not talking about you. I'm talking about the way the
16 class was run and the way the instructors instructed, that
17 was pretty much your opinion.
18 A I wouldn't say so, I don't believe.
19 Q But did you say that the instructors essentially implied
20 that it was okay if you found somebody who had drugs on
21 them, to watch them take drugs and evaluate them?
22 A I can't remember if an instructor actually said that or
23 not.
24 Q But they didn't say you couldn't do it?
25 A They never said we couldn't do it. I don't remember it

27

1 MR. MIDOLO: Let's go off the record.
2 (Recess.)
3 MR. MIDOLO: I don't have any questions.
4 We'll read and sign, if there's no other questions.
5 (WHEREUPON, the deposition of KENNETH
6 WILLERS concluded at approximately 3:15 p.m.)
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1 being brought up to where they had said you couldn't do it.
2 Q But did you understand that essentially that was the
3 unwritten rule, that it was okay?
4 A Yes.
5 Q Did you learn anything in the DRE program --
6 A Yeah, I learned that --
7 Q -- that you didn't know -- that you didn't know before?
8 A I learned a lot.
9 Q Do you think you can identify somebody high on marijuana
10 that you couldn't have identified before?
11 A I wouldn't say just marijuana. I would say more other
12 drugs that I wouldn't have known before.
13 Q Like cocaine?
14 A Any other drugs.
15 Q But marijuana, you know what people look like on marijuana?
16 A Yeah, most of the time.
17 Q Because everybody has seen people who are high on
18 marijuana --
19 A Yeah.
20 Q -- just from being in high school or being in college or
21 whatever.
22 A Yes.
23 MR. MILSTEIN: All right. I think we're
24 done.
25 MR. HANSEN: Can we take a quick break?

28

1 STATE OF MINNESOTA)
2) ss.
3 COUNTY OF ANOKA)
4
5 Be it known that I took the deposition of KENNETH
6 WILLERS on the 20th day of November, 2014, at Minneapolis,
7 Minnesota;
8 That I was then and there a Notary Public in and for
9 the County of Anoka, State of Minnesota, and that by virtue
10 thereof, I was duly authorized to administer an oath;
11 That the witness before testifying was by me first
12 duly sworn to testify the truth and nothing but the truth
13 relative to said cause;
14 That the testimony of said witness was recorded in
15 stenotype by myself and transcribed into typewriting by myself
16 and that the deposition is a true record of the testimony given
17 by the witness to the best of my ability;
18 That I am not related to any of the parties hereto nor
19 interested in the outcome of the action;
20 That the reading and signing of the deposition by the
21 witness was not waived.
22 WITNESS MY HAND AND SEAL THIS 5TH DAY OF DECEMBER, 2014.
23 (SEAL)
24
25 Debra J. Mokszycke, Notary Public

Deposition of Kenneth Willers taken 11/20/14

1 Forest Olivier et al. vs. Karl Willers et al.

2

3 ADDITIONS, OMISSIONS AND CORRECTIONS

4 Page Line Addition, Omission or Correction Reason

5 _____

6 _____

7 _____

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16 _____

KENNETH WILLERS

18

19 The above-named individual, before me, read said
20 deposition and made the additions, omissions and corrections as
21 indicated.

22 _____

Notary Public

23

24

25 My Commission Expires _____ (DJM)