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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

JOHN G. SPIRKO, JR., )  
Plaintiff, )

vs. ) CASE NO.

MARGARET BRADSHAW, WARDEN, ) 3:95 CV 7209  
Defendant. )

- - -

Deposition of PAUL M. HARTMAN, a  
witness herein, called by the Plaintiff for  
Examination pursuant to the Federal Rules of  
Civil Procedure, taken before me, the  
undersigned, Binnie Purser Martino, a Registered  
Diplomate Reporter, Certified Realtime Reporter  
and Notary Public in and for the State of Ohio,  
pursuant to Notice and agreement of counsel at  
the offices of Court Reporters of Akron, Canton  
and Cleveland, 40 East Buchtel Avenue, Akron,  
Ohio, on Thursday, the 16th day of June, 2005,  
commencing at 9:35 o'clock a.m.

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1 against somebody, there is a mechanism to file a  
2 complaint and then have it investigated?

3 A. Yes.

4 Q. Does that have a name, that process?

5 A. Well, we just knew it to be an Internal  
6 Affairs function.

7 Q. Okay. During your tenure in the 27-plus  
8 years, were you ever subject to any complaint?

9 A. To the best of my knowledge, I never had a  
10 complaint. I was the subject of one Internal  
11 Affairs investigation, and that is when I shot a  
12 suspect in May of 1993.

13 Q. That is a routine investigation any time  
14 there is a shooting?

15 A. That's correct; mandatory.

16 Q. And I take it you were -- it was found to  
17 be a justified shooting?

18 A. It was ruled by the prosecutor as  
19 justifiable shooting. The offender survived and  
20 went to prison, and the Internal Affairs  
21 investigation found that I had acted justifiably  
22 when I shot a person, who likely would have  
23 otherwise killed me.

24 Q. From whom and how did you learn that Connie  
25 Mottinger had spoken to myself and Mr. Dunn?