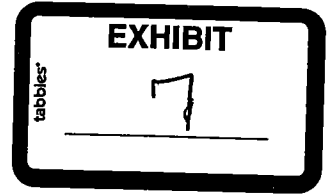


Deposition of Wanda Jacobs, taken November 2, 2010

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION



HIDDEN VILLAGE, LLC,	)	
	)	
Plaintiff,	)	
vs.	)	Case No. 10-00887
	)	
CITY OF LAKEWOOD, et al.,	)	
	)	
Defendants.	)	
	)	

- - - - -  
 THE DEPOSITION OF WANDA JACOBS  
 TUESDAY, NOVEMBER 2, 2010  
 - - - - -

The deposition of WANDA JACOBS, called by the Defendants for examination pursuant to the Federal Rules of Civil Procedure, taken before me, the undersigned, Kathleen DiNovo, a Registered Professional Reporter and Notary Public within and for the State of Ohio, taken at the offices of Haber, Polk & Kabat, LLP, 737 Bolivar Road, Suite 4400, Cleveland, Ohio, commencing at 1:10 p.m., on the day and date above set forth.

1 about an inspection that occurred about a year

2 later in May --

3 A A year later?

4 Q 2007.

5 A Yeah. I don't recall if I was there or not.

6 Q Did anybody talk to you about that inspection

7 in May of 2007?

8 A No.

9 Q Do you recall being present for any follow-up

10 inspections to the one in May of 2007?

11 A No.

12 THE WITNESS: Do you mind if I

13 break for coffee?

14 MR. CLIMER: Not at all.

15 - - - - -

16 (Recess taken.)

17 - - - - -

18 BY MR. HABER:

19 Q During your time at the Hidden Village complex,

20 have you ever witnessed any inappropriate

21 police conduct directed toward YRP clients?

22 A Yes.

23 Q Can you tell me about that?

24 A They were given tickets for jaywalking and

25 astronomical fines for it.

1 I'm interested in what you had heard.

2 A I don't want to repeat hearsay.

3 MS. ROLLER: Why don't you ask  
4 her for any specifics, if that's what you're --

5 Q Well, can you tell me what it is that you  
6 heard?

7 MS. ROLLER: It's all right. You  
8 can tell him that.

9 A The case managers complained about their  
10 clients being harassed.

11 Q Did they give you any specifics of what they  
12 felt was harassment?

13 A No. They just said that they feel that their  
14 clients are being harassed by the police  
15 department.

16 Q Anything else that you heard in terms of  
17 inappropriate police department conduct  
18 directed toward YRP personnel or clients?

19 A No.

20 Q Setting aside the police department, okay, have  
21 you witnessed any inappropriate conduct  
22 directed at YRP, its personnel or clients, by  
23 any other members of the city administration?

24 A No.

25 Q Have you heard rumors to that effect?