

# **EXHIBIT N**

Capital Reporting Company  
Shelton, Lieutenant Jon 07-29-2013

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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DICK ANTHONY HELLER, et al.,	:	
	:	
Plaintiffs,	:	
vs.	:	Case No.
	:	
DISTRICT OF COLUMBIA, et al.,	:	08-01289 (JEB)
	:	
Defendants.	:	
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Washington, D.C.

Monday, July 29, 2013

Deposition of:

LIEUTENANT JON SHELTON

called for oral examination by counsel for  
Plaintiffs, pursuant to notice, at the Office of the  
Attorney General, 441 4th Street, Northwest,  
Washington, D.C., before Amber L. Dill, of Capital  
Reporting Company, a Notary Public in and for the  
District of Columbia, beginning at 1:00 p.m., when  
were present on behalf of the respective parties:

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 Shelton, Lieutenant Jon 07-29-2013

70	<p>1 A For just privacy reasons.</p> <p>2 Q Oh, okay. Well, let me ask you, as a police</p> <p>3 officer, if an officer is responding to a call where</p> <p>4 there might be a domestic disturbance or a crime in</p> <p>5 progress or things of that nature, and someone told</p> <p>6 him, we've checked the database and we don't find any</p> <p>7 guns present, would he be justified in walking in</p> <p>8 there with his guard down, feeling that he could</p> <p>9 confidently say that there would be no guns there?</p> <p>10 MR. SAINDON: Calls for an opinion.</p> <p>11 You can answer.</p> <p>12 THE WITNESS: I don't think any of us ever</p> <p>13 go into a call for domestic violence with our hands</p> <p>14 down. It's one of the most dangerous situations that</p> <p>15 you can ever go into. That's where most officers are</p> <p>16 injured.</p> <p>17 My position was it was possible -- possible</p> <p>18 abuse of having too many people have access to our</p> <p>19 database.</p> <p>20 BY MR. PETERSON:</p> <p>21 Q Okay.</p> <p>22 A I wanted it well restricted, well within our</p>	72
71	<p>1 grips and not, you know, out where it could be -- be</p> <p>2 possibly abused.</p> <p>3 Q Okay. Is it correct that police officers</p> <p>4 are trained to treat situations where there might be a</p> <p>5 crime in progress or domestic dispute or some other</p> <p>6 situation possibly involving violence as always having</p> <p>7 a potential to have a dangerous weapon present?</p> <p>8 MR. SAINDON: Objection. Relevance.</p> <p>9 THE WITNESS: I would say of course.</p> <p>10 BY MR. PETERSON:</p> <p>11 Q Right. Okay.</p> <p>12 A Yes.</p> <p>13 Q Thank you. I think we already marked</p> <p>14 Exhibit S8. This is the December 5th letter from the</p> <p>15 District's attorneys to counsel for the plaintiff. If</p> <p>16 you could get that in front of you, please.</p> <p>17 And on page 2 of that document -- and it's</p> <p>18 the one, two, three, fourth paragraph down -- and it's</p> <p>19 the one that begins, "Regarding your complaint as to</p> <p>20 the District's response to interrogatory number 21."</p> <p>21 Do you see that paragraph?</p> <p>22 A Yes, I do.</p>	73
70	<p>1 Q Then there's a statement that says that,</p> <p>2 "According to Lieutenant Shelton, there have been less</p> <p>3 than a dozen instances since he's been at SOMB where</p> <p>4 certain police agencies, like MPD-Narcotics or the</p> <p>5 U.S. Park Police, have contacted the firearms</p> <p>6 registration section prior to executing a search</p> <p>7 warrant in an effort to determine if there were any</p> <p>8 registered firearms associated with a particular</p> <p>9 address."</p> <p>10 Is that a true statement, first of all?</p> <p>11 A Yes.</p> <p>12 Q Okay. And how long have you been at SOMB?</p> <p>13 I'm not sure of that.</p> <p>14 A Twelve years.</p> <p>15 Q Twelve years. Okay. And it states that</p> <p>16 there's been less than a dozen. Can you recall some</p> <p>17 specific instances for us when this has taken place?</p> <p>18 A Yeah. Yes, I can.</p> <p>19 Q Okay. Why don't you give us a couple of</p> <p>20 those.</p> <p>21 A Examples?</p> <p>22 Q Yeah.</p>	73