Misc-Court-Prep

Nick Adams Testimony:

Remember to speak slowly and clearly. If you do not understand a question, please ask me to re-phrase. On cross - answer just the question asked, wait a second or two after the question is asked before answering (to see if I have an objection), and if you do not understand a question ask the attorney to re-phrase the question.

Possible Questions:

General:

- 1) Name?
- 2) Position with the City? How long?
- 3) Prior work experience?
- 4) Education?
- 5) Training?
- 6) Describe what you do for the City? (describe your job; how you get complaints and inspect properties, etc.)

Inspection:

- 7) Are you familiar with 120 Baxter Blvd.?
- 8) Did you have the opportunity to inspect the property? Why? (describe complaints received).
- 9) When did you inspect the property? Do you recall how many times you inspected the property?
- 10) Why did you first go to inspect the property? (Describe the complaints you received) I will present complaint detail reports to the Court/You as an exhibit at this time.
- 11) Can you describe your inspection of the property? Did you inspect with anyone else? Who else was there? Where did the inspection begin?
- 12) Describe what you saw in the basement. Did you see any violations in the basement? What? (describe each violation in the basement) How do you know they were violations? Are you familiar with the Code? What part of the code does that violate?
- 13) Describe what you saw on the first floor. Did you see any violations on the first floor? If yes, please describe them. What part of the code did it violate?
- 14) Describe what you saw on the second floor (describe rental of units tenants and their things in the rooms, etc.). Did you see any violations on the second floor? If yes, please describe them. What part of the code did it violate?
- 15) Describe what you saw in the attic. Did you see any violations on the attic? If yes, please describe them. What part of the code did it violate?
- 16) Did you write up your inspection notes? Where are they kept? Is this a copy of them (show you your notes and you verify that they are your notes). Did you take the notes immediately after the inspection? When? Did you send them to someone? Who?

- 17) Did you send a notice to Mr. Yee (yes; spoke to him in person and my attorney sent him one).
- 18) Have you received any additional complaints with regard to 120 Baxter Blvd.? What? From whom? When? (Ray Huff E-mail/Other?).