INTERVIEW OF

CASE NO. A06082

TAKEN: October 4, 2007

1128 HOURS

INTERVIEW CONDUCTED BY:

SR. DEP. QUANICO #1529

AND

A.D.A. KNOLLS

--oOo--

SR. DEP. QUANICO: Okay, we're on. Today is, uh, Thursday, and today's date is October 4, 2007. Time of this interview is 1128 hours. Uh, this is, uh, an interview for case A06082. My name's Senior Deputy Quanico – Q-U-A-N-I-C-O, star number 1429. I'm with the San Francisco Sheriff's Department Investigative Service Unit. Also with me today is . . .

A.D.A. KNOLLS: Assistant D.A. [Diane Knolls].

SR. DEP. QUANICO: And also?

DR. Uh, radiologist, University of California, San Francisco.

SR. DEP. QUANICO: Okay. And Mr. um, who are you employed with at this time?

DR. The University of California, San Francisco.

SR. DEP. QUANICO: And how long have you been there?

DR. Uh, a year and a half as an attending radiologist and a year as a fellow.

SR. DEP. QUANICO: Okay, and in May, June of last year, uh, where -- who were you employed with and where did you work?

DR. I was working for University of California, San Francisco, which, uh, contracts out with, uh, San Francisco General Hospital.

SR. DEP. QUANICO: Okay. So on or about June 2, were you working at San Francisco General Hospital?

DR. That's correct.

SR. DEP. QUANICO: Okay. And, um, before we went on tape, Dr. , uh, basically, uh, we had you review some x-rays that were taken, uh, from a patient by the name of, uh, who alleged he was, um, assaulted, um, in the county jail while he was in custody with us. And there were several x-rays taken, and, um, you had a chance to review those. And, um, uh, before we went on tape, uh, it was clear that, uh, we have some issues with the June 2, um, x-ray where you cannot really see the fracture to the tenth rib on the left side, correct?

DR. That's right.

SR. DEP. QUANICO: But we were able to see a fracture to the ninth.

A.D.A. KNOLLS: Why don't we, um, ask Dr. to go through and describe, um, what he has seen on the, uh, x-rays that we've shown him today?

SR. DEP. QUANICO: Great.

DR. Well, it looks like the patient had x-rays back in March in which no rib fractures were visualized. And then we were looking at a rib series of which we have only one of the three images from May 30, 2006. And that demonstrates, uh, what appears to be an acute left ninth lateral rib fracture. Uh, and then there's a repeat chest x-ray on June 2 in which you again see that acute, uh, lateral ninth rib fracture, uh, and, uh, the other f, uh, rib in question, on the tenth, uh, of the tenth rib on the left is very difficult to visualize on, um, without the pax workstation.

SR. DEP. QUANICO: Okay, and in the x-rays that we viewed, that were taken in March, did you see a fracture in any of those x-rays?

DR. No. No, I did not.

SR. DEP. QUANICO: Okay. Well, I have some questions to ask, and I know, uh -- uh, A.D.A. Knolls may have some other questions, but basically, um, is there any difference between the x-ray taken on May 30, 2006 and the x-ray that was taken on -- on June 2, 2006?

DR. [redacted] The May 30 x-ray, uh, [the -- the -- the June 2] is a frontal chest, where the x-ray beam is shot directly from the front to the back. Uh, the other image from May 30 is oblique, where the patient's turned -- it appears that the patient's turned to the, uh, it looks like they're turned to the left, on that study, so it's an oblique as opposed to a frontal.

SR. DEP. QUANICO: Okay, and in both x-rays, it's apparent that the ninth rib is fractured?

DR. [redacted] That's correct.

SR. DEP. QUANICO: Okay. And, um, in your opinion, how -- how do you believe the fractured rib was sustained on May -- on the May 30 x-ray?

DR [redacted] Specifically -- what do you mean?

SR. DEP. QUANICO: Um, would it be -- was it caused by a blunt object? Was it caused --

DR. [redacted] Oh, I see. So it was caused likely by a direct blow to that region of moderate force, or moderate to severe force.

SR. DEP. QUANICO: Okay. Did the June 2, 2006 x-ray reveal a new injury or was it the same injury sustained on May 26?

DR. [redacted] The June 2 revealed, again, the left ninth lateral rib fracture, which was seen on the May 30 study, uh, and, um, without -- there's a question of the tenth being fractured as well, and I did not see that on these films today. Um, but, again, I would like to look at that on a -- with better resolution on a real monitor.

SR. DEP. QUANICO: Okay. From what you were able to view on -- on our screen today, did it appear that the injury worsened on June 2 or was it basically the same?

DR. [redacted] The same.

SR. DEP. QUANICO: Okay. Is there a possibility that the May 30, 2006 x-ray revealed an old rib injury?

DR. An old [injury]?

SR. DEP. QUANICO: An old fracture?

DR. I did not see an old fracture on that. I saw a new fracture.

SR. DEP. QUANICO: Okay, all right. And just to make it clear, can you -- can you, um, define acute? What do you mean by an acute fracture?

DR. Acute means it's happened, uh, it's usually within one to two weeks, because after, uh, that period of time, you develop some healing, and callous formation, and that's usually evident on a chest x-ray that you've had some healing.

SR. DEP. QUANICO: Okay. So in your report dated, um, 6-2-06, in your, um, in your report it says here that you saw an acute lateral ninth and tenth left sided rib fracture, and acute would be within a two-week period, you said?

DR. That's correct.

SR. DEP. QUANICO: Okay. Now, I know took -- reviewed the x-rays on May 30. He mentioned a -- mentions a -- his impression, he saw a fracture of lateral ninth rib with a small left effusion. Can you -- can you, uh, define that for me? What -- what did he mean by a small left eff -- effusion?

DR. Uh, there is something called the plural space which is a -- a space between the lung -- the outside of the lung and the inside of the chest wall, and there's usually very little to no fluid in that, uh, space. And when you get some sort of insult or injury of some kind, you can get a small amount of fluid, uh, that's sympathetic to whatever injury was sustained.

SR. DEP. QUANICO: Okay. And did you see that in the June 2 image?

DR. I did not.

SR. DEP. QUANICO: Okay. Mr. alleged someone had kneed him in the ribs. Are the fractures that you saw on the May 30 x-ray as well as the June 2, that you saw yourself, would it be consistent to his allegation?

DR. Yes, yes it would.

SR. DEP. QUANICO: Okay. A.D.A. Knolls?

A.D.A. KNOLLS: Um . . . can you tell us why the effusion that was noted by Dr. on the 30th, um, would no longer be there when you saw it on -- on the, um, June 2, and if -- and what that would mean?

DR. Uh, it doesn't necessarily mean anything, um, because a small effusion is not -- often not seen on a frontal view of the chest, which is what I had, because it's -- can be obscured by the diaphragm, so it may be there or may that -- may be that it's just resolved.

A.D.A. KNOLLS: And, um, did you note in any of the x-rays that you've seen any evidence of a previous rib injury?

DR. No.

A.D.A. KNOLLS: Would you necessarily have seen that?

DR. Not necessarily.

A.D.A. KNOLLS: Okay.

SR. DEP. QUANICO: Dr. in terms of what we were able to look at today on our, um, computer screen, um, would you be able to give us a better indication of the injury, uh, that Mr. sustained on a workstation, um, designed to look at x-rays?

DR. The -- I think the -- the advantage of that would be to evaluate whether a new rib fracture of the tenth rib was seen between the May 30 and the June 2 -- right, [I think those are the dates].

A.D.A. KNOLLS: Um, additionally, um, we have only been able to look at one of the three, uh, views that were taken on May 30 --

DR. That's right.

A.D.A. KNOLLS: And we would like to have you look at the other two as well.

DR. [redacted] Okay.

SR. DEP. QUANICO: And would you be able to do that at another time?

DR. [redacted] Yes.

SR. DEP. QUANICO: Okay. A.D.A. Knolls, do you have any other questions?

A.D.A. KNOLLS: Uh, I don't think so.

SR. DEP. QUANICO: Okay. Is there anything else that you'd like to add at this time?

DR. [redacted] I don't think so, no.

SR. DEP. QUANICO: And I -- I think I do have another question. On the injury that he alleged, um, that he sustained from, um, from this particular deputy took place on May 26, '06, and he did not get an x-ray until May 30. Would there be a -- is there -- would there be a healing process within those four days?

DR. [redacted] No, usually not. Not four days.

SR. DEP. QUANICO: Okay, so you would be able to see an acute fracture still within those four days?

DR. [redacted] A fracture -- a fracture would still acute at that delay after the patient or the person was assaulted.

A.D.A. KNOLLS: I actually do have a couple more questions. Um, what would, um, what would be the, uh, symptoms that somebody would exhibit, um, after getting assaulted, let's say, on May the 26th -- what -- and sustained this kind of an injury to the ribs -- what sort of, um, symptomology would you expect over the course of the next few weeks?

DR. [redacted] So, uh, right away we'd expect the patient to have pain directly above or at the site of the injury. Um, people often explain having something called paretic chest pain, where they take a deep breath in and the pain worsens. And then you would expect that over, uh, it's variable, but over, uh, a week or even [to two weeks]

for that to -- to fade. And, uh, usually by a two-week period, you don't -- you have very little pain left.

SR. DEP. QUANICO: Um, is it possible that, um, taken other medication, um, would have an effect on the pain?

DR. Any pain medications and any pain, uh, medications that can affect, um, your level of consciousness could affect the, uh, manifestations of pain.

A.D.A. KNOLLS: Okay. Um, is it possible that, um, for somebody to sustain this sort of injury, yet, um, it -- that not be apparent to persons observing that -- that injured person?

DR. Yes, I think that's definitely true.

A.D.A. KNOLLS: All right.

SR. DEP. QUANICO: Okay. Dr. I don't have any other questions. Um, and I didn't ask you at the beginning, but how long have you been, uh, a medical doctor now?

DR. Uh, I have been, uh, an attending radiologist for about a year and a half. I was a fellow for a year before that. And I was a resident for five years before that. So the total's been about, uh, seven and a half years.

SR. DEP. QUANICO: Okay. And you're now at, um, UCSF, correct?

DR. That's right.

SR. DEP. QUANICO: And is that the Parnassus --

DR. Parnassus, yes.

SR. DEP. QUANICO: Okay. Great. And what's the address there?

DR. 505 Parnassus.

SR. DEP. QUANICO: Great. I don't have any other questions. A.D.A. Knolls?

A.D.A. KNOLLS: That's -- that's -- that's all I have.

SR. DEP. QUANICO: Okay. Good.

A.D.A. KNOLLS: Thank you.

SR. DEP. QUANICO: Thank you for your time, Dr. Um, the time is 1139 hours. This will conclude our interview. Thank you.

[Break in recording.]

A.D.A. KNOLLS: Yeah, that would be great. If you could get us your CV, though, that would be great.

DR. Sure, yeah.

[End of recorded material.]

INTERVIEW OF DR.

CASE NO. A06082

TAKEN: October 18, 2007

1611 HOURS

INTERVIEW CONDUCTED BY:

SR. DEP. QUANICO

--oOo--

SR. DEP. QUANICO: Okay, uh, we're on. This is a telephone interview. Today is, uh, Thursday, and it's, uh, October 18, 2007. Time of this interview 1611 hours. Uh, my name is Senior Deputy Quanico. Q-U-A-N-I-C-O. Star number 1429. I'm an investigator, uh, here at the San Francisco Sheriff's department. Uh, I'm located at 25 Van Ness, room 350 here in San Francisco, and I'm talking on the phone with. . .

Uh, I'm the Assistant Professor of Radiology at, uh, University of California San Francisco.

SR. DEP. QUANICO And Dr. could you spell your last name for our records?

SR. DEP. QUANICO: Great. And, uh, how long have you been at, uh, UCSF, doctor?

Uh, I've been an assistant professor for a year and a half, and then a-a fellow a year before that.

SR. DEP. QUANICO: Great. And, uh, where are you located at this time?

Cur-like right now?

SR. DEP. QUANICO: Yes.

Oh, I am, uh, in right now.

SR. DEP. QUANICO: Great. And that's for purposes, uh, of-of this taped interview. And, uh, the phone number I called is this correct? Is it ?

That's right.

SR. DEP. QUANICO: Great. Uh, we met with you, meaning myself and [ADA] Knoles. She won -- she will not be present today. Uh, on October 4, 2007. And you were able to review x-rays of, uh, Mr. correct?

That's correct.

SR. DEP. QUANICO: And, uh, specifically, uh, you were able to re -- to look at your-uh, the x-rays that you reviewed on June 2, 2006. And according to your, uh, to your report, you saw a fracture to the ninth and tenth rib, uh, in your, uh -- on your June 2nd x-ray, correct?

Mm-hmm.

SR. DEP. QUANICO: And, uh, I had, or we had you look over the x-rays that Dr. reviewed on May 30, 2006. And, uh, unfortunately at the time of that interview, uh, we only had one view. And apparently three views were taken of that particular, uh, uh, or of that particular view of the, uh, of the chest, correct?

That's right.

SR. DEP. QUANICO: And, uh, we went ahead and made some arrangements, and we had San Francisco General Hospital, uh, forward those x-rays, uh, to one of your workstations, I believe at which is, uh, uh, located at UCSF, correct?

That's right.

SR. DEP. QUANICO: And, uh, you were able to review those, correct?

Mm-hmm.

SR. DEP. QUANICO: And, uh, when did you review those, uh, Dr, ?

I reviewed those two days ago.

SR. DEP. QUANICO: And that would have been the, uh, 16th?

That's right.

SR. DEP. QUANICO: Of October?

Yep.

SR. DEP. QUANICO: Okay. And, uh, after reviewing the, uh, additional views that were taken on May 30th, uh, what did you see, doctor?

The May 30th films, I, uh, was able to see the ninth lateral rib fracture, which was described in the report. I did not see any additional rib fractures.

SR. DEP. QUANICO: And, uh, and that's consistent with [Dr. report. I believe we went over that, and he only did see a ninth rib fracture, correct?

That's correct.

SR. DEP. QUANICO: And, uh, is there a reason why it's-uh, why you weren't able to see a fracture to the tenth rib?

On that initial -- on the --

SR. DEP. QUANICO: On the 5-30 x-ray?

Is there a reason why I wasn't -- Uh, I don't understand.

SR. DEP. QUANICO: Was it -- is it a bad view? Or was it-was it a little more difficult to-to see as compared to the June 2nd x-ray?

No. I don't think that it was any more difficult to see. Sometimes plain films are, for whatever reason, because of positioning or whatever or not, uh, can -- don't pick up all rib fractures. So if you see one, it's definitely there. If you don't see one, then, it doesn't mean that the patient doesn't have an additional rib fracture. It just means that that particular film did not see one. The rib series in theory should be -- provide better visualization. But that's not necessarily always the case.

SR. DEP. QUANICO: Okay. Now, would you rule out the possibility that, uh, Mr. could have, uh, had an additional fracture to his-to his ribs on June 2nd? In the June 2nd view? As compared to --

In the second views, the -- again I saw the ninth rib fracture, which is clear. The tenth, uh, rib, was somewhat difficult to visualize. I can't tell whether he had one or not. SO I can't rule out that he didn't have one. But, uh, I can't be definitive about whether he had one or not.

SR. DEP. QUANICO: And that's including your June 2nd, uh --

That's correct.

SR. DEP. QUANICO: View as well.

Yes.

SR. DEP. QUANICO: And were you able to review your June 2nd, uh, the June 2nd, uh, x-ray --

Right, yes.

SR. DEP. QUANICO: At-at a better station?

Yes.

SR. DEP. QUANICO: And you still, uh -- When you came in here on October 4th, do you feel the same -- Or basically, you see the same deal, where it's very difficult to tell if there was a fracture to the tenth rib?

That's right, yes.

SR. DEP. QUANICO: Okay. Is there anything that you'd like to add doctor? Anything that, uh, might be important?

Uh, I don't think so. No.

SR. DEP. QUANICO: Okay. And, uh, I believe the only thing that we had to, uh, to go over was the two x-rays taken on May 30th. Did you -- on those two views is there anything different than what you saw, uh, compared to the one view that we saw here in our office?

No difference. No.

SR. DEP. QUANICO: Okay. And, uh, the x-rays that were taken in March, uh, there clearly was no fracture in the x-rays taken in March of Mr. correct?

That's right.

SR. DEP. QUANICO: And were you able to review those again for any reason?

I did not look at those again. I just looked at the May 30th rib series and the 6-2 chest films.

SR. DEP. QUANICO: Great. Uh, Dr. I thank you. I want to go ahead and end this interview, and, uh, can you hold on the line?

Sure.

SR. DEP. QUANICO: After I turn off the recorder?

Mm-hmm.

SR. DEP. QUANICO: Okay. The time is, uh, 1616 hours. This will, uh, conclude our interview with Dr., uh, Thank you Dr.

[End of recorded material]