

1 MS. LURIA: If you could play 117E.

2 (Tape played.

3 Q. [REDACTED]?

4 A. Yes.

5 Q. I am going to ask you to look at Page 1 of the
6 transcript, 117EA.

7 A. Okay.

8 Q. [REDACTED], who is generally talking during this
9 conversation?

10 Who is speaking during this conversation?

11 A. Myself and Kirk Eady.

12 Q. If we can go to Page 1, the third line down: "I was
13 talking to Oscar this morning."

14 Do you see where I am looking?

15 A. Yes.

16 Q. Who said, "I was talking to Oscar this morning"?

17 A. Kirk Eady.

18 Q. Do you have an understanding of who Oscar is?

19 A. Yes.

20 Q. Who is Oscar?

21 A. Oscar Aviles, the Director of the Hudson County Jail.

22 THE COURT: Oscar who?

23 THE WITNESS: Aviles.

24 THE COURT: Aviles.

25 Q. And he is the director of the jail?

1 A. Yes.

2 Q. If you could look two lines down, where it says: "He
3 just came up, you know, with a brilliant idea."

4 Who said that?

5 A. Kirk Eady.

6 Q. If we can look two more lines down: "He's like just all
7 us, you know," names many people, "all get together and do a
8 fucking" -- I'm sorry -- "an f'g defamation lawsuit against
9 the f'g union and against f'g EDPD Law."

10 Who said that?

11 A. Kirk Eady.

12 Q. What is the union that the defendant is referring to?

13 A. PBA union.

14 Q. And when the defendant referred to EdPD Law, is he
15 referring to the EdPD Law we discussed before that is run by
16 Ms. Aiken?

17 A. Yes.

18 Q. Can we look two lines down?

19 He said, put like a f'g, you know, like \$4 million
20 f'g defamation of character lawsuit against him."

21 Do you see that?

22 A. Yes.

23 Q. Who said that?

24 A. Kirk Eady.

25 THE COURT: Well, is this whole conversation with

1 Kirk Eady?

2 THE WITNESS: Yes.

3 Q. Ms. Freeman, if you could now go to Page 2.

4 Do you see the lines: "So my purpose, my purpose,
5 I don't care if I win. It's the purpose of the mf'g union
6 dishing out money"?

7 A. Yes.

8 Q. Do you see that line?

9 A. Yes.

10 Q. What did you understand the defendant to be --

11 THE COURT: Wait, Counsel.

12 No. These things are self-explanatory. He says
13 what he is doing in the tape. We don't need her to
14 interpret it.

15 MS. LURIA: Yes, your Honor.

16 THE COURT: He says, "my purpose is."

17 MS. LURIA: Yes, your Honor.

18 THE COURT: And I think that applies to just about
19 the rest of this transcript.

20 MS. LURIA: Yes your Honor.

21 Q. Ms. [REDACTED], at this time, if you could look up from the
22 transcripts for a moment.

23 Did you testify earlier that the defendant recorded
24 the telephone conversations of Omar Ortiz?

25 A. The phone call with Ms. Aiken.