

## **4.6 PHOTOGRAPH OF POLICE OFFICERS AND PLAINTIFF**

This is a civil rights action brought against the city police department by Charles Jackson, who was arrested by the police on January 15 of last year. Jackson alleges that the police arrested him on that date without reason and physically assaulted him, depriving him of his civil rights.

Plaintiff's witness, Mickey Mars, was standing on the southeast corner of Clark and Madison Streets at about noon on January 15 and saw police officers on that corner forcing Jackson to the ground. He was about five feet away from the scene. The weather was clear and sunny. He was on his way to lunch from his office, one block south on Clark Street. One of the officers, he says, held Jackson while another officer poked his nightstick in Jackson's neck. Jackson then shouted: "Help, they're killing me."

1. For the plaintiff, get the photograph in evidence and use it in conjunction with the witness. This is the first time during the trial that the photograph has been mentioned.
2. For the defendant, oppose the offer.

