

**In The Matter Of:**

*Caniglia vs*

*Strom, et al*

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*Richard Greene*

*July 26, 2018*

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1 A. Yes.

2 Q. -- or separate. You can be a member of both?

3 A. Correct.

4 Q. Are you currently a member of the fire division?

5 A. You are a -- I am a firefighter for the City  
6 of Cranston. I do both jobs. I can do either/or.  
7 I'm an officer of the rescue division. So I am  
8 both. I do fire fighting, but my main job is a  
9 rescue lieutenant. I still do fire fighting,  
10 though.

11 Q. Sometimes you actually do ride a fire truck?

12 A. No. I do fire fighting on the rescue side.  
13 If I don't need to do the rescue part, I can do  
14 the fire fighting also. I'm cross-trained. I do  
15 both. I'm a firefighter, EMT, but I picked the  
16 rescue for my career right now.

17 Q. When was the last time you rode a fire truck?

18 A. Maybe two years ago.

19 Q. Oh, all right. Within the rescue division, you  
20 said you're a lieutenant?

21 A. Correct.

22 Q. Where does that put you in the hierarchy, who is  
23 above you?

24 A. Rescue captain and rescue chief.

25 Q. How many rescue lieutenants are there?

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1           impaired mental status or -- like I said, trauma  
2           that could alter somebody. Appearance, general  
3           appearance, I don't particularly remember -- I  
4           don't believe it states in my state protocols  
5           about how they dress or how they groom. I've read  
6           that in other materials about people not taking  
7           care of themselves. Not in this particular form.  
8           I have not seen this one.

9       Q.    If you go two pages farther on Page 36, there's a  
10           Roman IV; do you see that?

11           A.    Yes.

12       Q.    It says suicide/depressions, under that it says  
13           risk factors for suicide; do you see that?

14           A.    Yes.

15       Q.    Have you seen a list like that in your protocols  
16           or anyplace else?

17                       MR. CUNNINGHAM: Objection.

18           A.    I've never seen this particular list, but I  
19           see things in here that are part of the protocols.

20       Q.    All right. They have numbers, small i as a Roman  
21           numeral through I guess it's XIX; do you see that,  
22           XIX?

23           A.    Yes.

24       Q.    All right. Which one of these risk factors do you  
25           recognize as being ones in the protocol that you

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1 would consider, or ones that you would, not either  
2 way?

3 A. 1, 2, 4, 7, 10, 11, 12, 13, 14, 15, 17, 18,  
4 19.

5 Q. Just so we're clear, what you just listed are the  
6 factors you do recognize as being part of the  
7 protocol that you would consider, is that fair to  
8 say, as opposed to the ones that you would not?

9 A. So -- yes.

10 Q. Do you know if those are specifically set forth in  
11 a written protocol, or are they just part of the  
12 factors you would consider yourself, regardless of  
13 whether they're written down someplace?

14 A. Correct. So the answer is I look at a  
15 person, and depending on what they tell me,  
16 obviously, I could associate these with every  
17 different type of incident depending on why.

18 Q. My question is are the factors that you would  
19 consider, which you just identified from this  
20 list, are they written down in appropriate color,  
21 are they simply factors that in your mind you  
22 would consider?

23 A. Suicidal is written down, homicidal is  
24 written down in state protocols.

25 Q. So, those factors, the ones that are in the state

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1 police officers consider the same risk factors?

2 A. I have no idea.

3 Q. Do you know what risk factors they do consider?

4 A. I have no idea what their rules are, or how  
5 they handle things.

6 Q. Okay. Besides the protocols we mentioned, does  
7 the Cranston Fire Department have any other rules,  
8 policies, guidelines for dealing with people who  
9 may be suicidal?

10 A. No, not that I recall, other than state  
11 license protocols.

12 Q. This case involves a gentleman named Ed Caniglia.  
13 Did you know Ed Caniglia before August 22nd, 2015?

14 A. I don't believe so.

15 Q. Has wife's name is Kim. Did you know Kim Caniglia  
16 before August 22nd, 2015?

17 A. I don't believe so.

18 Q. Had you ever heard of either one of them before  
19 then?

20 A. No.

21 Q. I gather you've never had any contact with them,  
22 to your knowledge?

23 A. Not that I recall.

24 Q. All right. Do you remember going to the  
25 Caniglias' house on August 22nd, 2015?

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1 A. Yes.

2 Q. Okay. As you sit here today, why don't you tell  
3 me what you remember about that.

4 A. All I can tell you is if I didn't have that  
5 rescue report, it was a very short run. Meaning,  
6 I remember going to a call. I reviewed my report  
7 to try to bring back memories of the call. I  
8 think it depends on, you know, the nature of the  
9 call is how I remember things depending on how  
10 detailed it is. From reading the report --

11 Q. Let me interrupt you. If you had not read the  
12 report, and I gather you did that just within the  
13 last month or so?

14 A. Yes.

15 Q. What would you have remembered about this?

16 A. How would you -- the question is would I  
17 remember a call that you just said, 2300 Cranston  
18 Street; no, I would not remember that.

19 Q. So, when you first got a phone call that said your  
20 deposition was going to be taken in this case and  
21 you had not yet looked at the incident report, did  
22 you have any memory of making a run to the  
23 Caniglias' house?

24 A. No.

25 Q. After you looked at the incident report, did it

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1 remind you of making the run, apart from simply  
2 reading what was set down in your report?

3 A. Yes.

4 Q. Okay. Having read the report, what were you  
5 reminded of?

6 A. I was reminded that there was a situation  
7 about a man with a gun. Normally, we wait for the  
8 police. They were already there. I remember the  
9 police coming out with the patient which is Mr. --  
10 what's his name?

11 MR. LYONS: Caniglia.

12 A. Caniglia. Yes. Are you asking me the whole  
13 call at this time?

14 MR. LYONS: I'm asking you what you  
15 remember. If there are parts of it that you only  
16 know because it's in your incident report, we're  
17 going to talk about that. So I'm just trying to  
18 find out what you now remember having refreshed  
19 your recollection from the report.

20 A. Okay. Besides what I've written down in the  
21 report, all I remember is the police officers  
22 walking out the patient and coming to my truck,  
23 talking to the police officer for a short time and  
24 going inside the rescue, that's the only other  
25 thing I remember.

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1 Q. Do you remember anything specific that the police  
2 said to you?

3 A. Yes. They told me that they recovered the  
4 weapon, which is a gun, and they told me that the  
5 patient wanted his wife to shoot him with his own  
6 gun.

7 Q. Do you remember anything else the police told you?

8 A. No.

9 Q. Did you talk to Mr. Caniglia?

10 A. Yes.

11 Q. All right. Do you remember what Mr. Caniglia  
12 said?

13 A. I believe, per the report now, I asked the  
14 patient what was going on, and he told me exactly  
15 what the police officer told me. He did not deny  
16 the allegations.

17 Q. Okay. Do you know if you asked or if you were  
18 told whether the gun was loaded?

19 A. No.

20 Q. Did you -- would you normally have asked that  
21 question?

22 A. No.

23 Q. Would it matter to you?

24 A. No.

25 Q. Why not?



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1           dispute with his wife.

2       Q.    Do you recall if you asked Mr. Caniglia about any  
3           of the risk factors for suicide that you have  
4           identified?

5       A.    I don't recall.

6       Q.    Do you know if the police made a determination  
7           whether or not Mr. Caniglia was suicidal?

8       A.    No idea.

9       Q.    Apart from the fact that Mr. Caniglia had made  
10          this statement about he wanted his wife to shoot  
11          him, did you consider any other factors as to  
12          whether he was a risk for suicide?

13      A.    Other than him telling me he wanted his wife  
14          to shoot him twice, from the night before and that  
15          day.

16      Q.    Is it your understanding that he had said that  
17          twice?

18      A.    Yes.

19      Q.    And what is that based on?

20      A.    From what the police told me, and what he  
21          told me.

22      Q.    So your recollection is Mr. Caniglia told you that  
23          he had twice told his wife he wanted her to shoot  
24          him?

25      A.    The patient, or the police. He told me, I

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1 believe from the report, I'm not sure if it was  
2 the police or Mr. Caniglia, I think they both told  
3 me the exact same story, pretty close. He  
4 confirmed it.

5 Q. Do you recall Mr. Caniglia actually saying that he  
6 had twice told his wife he wanted her to shoot  
7 him?

8 A. I believe so, yes. The night before, and  
9 that morning.

10 Q. No, no. I mean, as you're sitting here now, do  
11 you remember those words coming out of  
12 Mr. Caniglia's mouth?

13 A. If I wrote it in the report, yes.

14 Q. Do you know if Mr. Caniglia had a history of  
15 depression or other mental disorders?

16 A. He did not tell me.

17 Q. Did you ask him?

18 A. I'm sure I did.

19 Q. Okay. Do you know what he said?

20 A. If I didn't write it in the report, I would  
21 say no.

22 Q. Okay. Do you know if he made any prior suicidal  
23 gestures or attempts?

24 A. No idea.

25 Q. Do you know if you asked him?

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1 A. I do not recall.

2 Q. Do you know if he had feelings of hopelessness?

3 A. Well, when you say your wife is going to  
4 leave you, I don't know how you want to -- I can't  
5 tell you how the guy feels. All I know is he was  
6 upset.

7 Q. Why do you say his wife was going to leave him?

8 A. Because he told me that; that's in my report.

9 Q. You have a specific recollection of Mr. Caniglia  
10 saying that his wife was going to leave him?

11 A. I wrote it in my report, so, yes.

12 Q. Do you know if Mr. Caniglia had a history of  
13 impulsive or aggressive behavior?

14 A. No, I didn't.

15 Q. Did you ask him?

16 A. I don't remember.

17 Q. Do you know if he had a recent loss of a loved  
18 one, job, money or social loss?

19 A. No idea.

20 Q. Did you ask him?

21 A. I don't remember.

22 Q. Do you know if he had -- well, PTSD stands for  
23 post-traumatic stress disorder, correct?

24 A. Correct.

25 Q. Do you know if Mr. Caniglia had PTSD?

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1 A. No idea.

2 Q. Did you ask him?

3 A. I don't remember.

4 Q. Did he have a history of alcohol or drug abuse?

5 A. No idea.

6 Q. Did you ask him?

7 A. Don't remember.

8 Q. Had he given away any of his personal belongings  
9 or cherished possessions?

10 A. No idea.

11 Q. Did you ask him?

12 A. I don't remember.

13 Q. Had he had major physical stress physically?

14 A. No idea.

15 Q. Did you ask him?

16 A. Don't remember.

17 MR. CUNNINGHAM: Can we take a  
18 five-minute break?

19 MR. LYONS: Absolutely.

20 (RECESS)

21 Q. Did you hear any conversations between  
22 Mr. Caniglia and any Cranston police officer?

23 A. No.

24 Q. Do you know who made the decision that  
25 Mr. Caniglia was going to go to the hospital?

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1 THE WITNESS: Say that question  
2 again?

3 Q. Do you know who decided that Mr. Caniglia was  
4 going to go to the hospital?

5 A. He had no -- he didn't have a -- he never  
6 denied (sic) not to go.

7 Q. Well, did you ask him if he wanted to go?

8 A. Did I ask him? I believe I told him that we  
9 were going to the hospital, and he did not deny  
10 it.

11 Q. Did the Cranston police tell you that Mr. Caniglia  
12 was going to the hospital?

13 A. I would say yes. That's why I was there.

14 Q. Did the Cranston police tell you why Mr. Caniglia  
15 was going to the hospital?

16 A. Yes.

17 Q. What did he they tell you?

18 A. He wanted his wife to shoot him, so they  
19 wanted a psych evaluation.

20 Q. Did anybody say that Mr. Caniglia had agreed to go  
21 to the hospital?

22 A. He agreed.

23 Q. How did he agree?

24 A. I told him we're going to the hospital, and  
25 he didn't refuse.

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1 Q. Okay. Did Mr. Caniglia ever say I want to go to  
2 the hospital for a psych evaluation?

3 A. Them words, no.

4 Q. You inferred from the fact that Mr. Caniglia did  
5 not verbally object, that he was agreeing to go to  
6 the hospital?

7 MR. CUNNINGHAM: Objection.

8 A. I told him, most likely I told him that we  
9 were going to the hospital for a psych evaluation;  
10 from what he said, I would have wrote it if he  
11 denied to go. He went willingly.

12 Q. And on what basis do you say he went willingly?

13 A. Because he got in my truck, I didn't have  
14 police with me, there was no restraints, it was  
15 verbally, it was calm, and he admitted to  
16 everything that happened. So in his mind he got  
17 out of the situation by leaving the house. He  
18 walked in my truck without any issue. We talked  
19 and we drove to the hospital. There was no  
20 unwillingness, there was no -- if there's anything  
21 that would not want him to go, it would have been  
22 written in the report.

23 Q. Okay. So there was no discussion with you about  
24 why he was agreeing to go to the hospital, as you  
25 understood it?

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1 MR. CUNNINGHAM: Objection.

2 A. The patient says he wants somebody to shoot  
3 him, and I state to him that we need to go to the  
4 hospital for a psych eval, and he doesn't  
5 disagree, we can go without any type of issues.  
6 Per the state, if he says he's homicidal or  
7 suicidal, or admits to it, we have the right to  
8 take him.

9 Q. And you interpreted the statement that he made to  
10 his wife about shooting him as being suicidal?

11 A. Correct. And having his wife commit  
12 homicide.

13 Q. Did you take his wife to the --

14 A. Never seen the wife.

15 Q. Did you talk to the wife?

16 A. No.

17 Q. Do you know whether -- did you ask him whether or  
18 not he was suicidal?

19 A. Yes.

20 Q. What did he say?

21 A. Not those words. I believe I might have  
22 asked him per the report if he wanted to hurt  
23 himself, and I believe he said no. But he wanted  
24 his wife to hurt him.

25 Q. Did you ask him why he made that statement to his

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1 things in.

2 Q. If you look at the top of the form, there are  
3 names of two people, Matthew Plante and Richard  
4 Greene; do you see that?

5 A. Yes.

6 Q. You're Richard Greene, obviously?

7 A. That's correct.

8 Q. And Matthew Plante was your driver?

9 A. At that time, yes.

10 Q. Next it says certified, or cert.; do you see that?

11 A. Yes.

12 Q. Does that refer to what kind of EMT license you  
13 have?

14 A. That is correct.

15 Q. And the cert. number, is that your state license  
16 number?

17 A. That's correct.

18 Q. Then there is a list of times in a vertical  
19 column; do you see that?

20 A. Yes.

21 Q. Do those indicate the times events occurred with  
22 respect to this incident?

23 A. Yes.

24 Q. So, on scene is that when you arrived at the  
25 Canaglias' house?



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1 A. Yes.

2 Q. It says 10:27, right?

3 A. Looks like that, yes.

4 Q. How is that filled in, do you actually type that  
5 in?

6 A. No, that's based on the computer when the  
7 dispatcher and I, depending on what we had at that  
8 time, either we have two days, one is a Rescue 3  
9 on scene, fire department plugs it in, and then my  
10 report is merged with dispatch. If it's not  
11 merged, then I will read it on something and put  
12 it down. Most of the time it's put in, it's  
13 whatever the department tells you the time I got  
14 to the scene.

15 Q. So, you get on your radio and you inform dispatch  
16 you have arrived?

17 A. Correct. Or I have a tablet on my truck that  
18 I will push on scene. I don't remember which I  
19 had at the time.

20 Q. Then there is also leave scene?

21 A. That's when I leave the scene.

22 Q. That's when you left with Mr. Caniglia in the  
23 truck?

24 A. That's correct.

25 Q. And that says 10:35?

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1 A. Correct.

2 Q. So, you were on the scene for about eight minutes?

3 A. Correct.

4 Q. Okay. Now, there's some other information filled  
5 in here. Did you get some of the information from  
6 Mr. Caniglia?

7 THE WITNESS: Like what?

8 Q. For example, it says allergies; do you see that?

9 A. Yes, he told me. It's a question I asked.

10 Q. So it looks like you typed in amoxicillin?

11 A. That's correct.

12 Q. So you got that from Mr. Caniglia?

13 A. That's correct.

14 Q. Underneath that it says medications; do you see  
15 that?

16 A. Yes.

17 Q. It looks like it says BP med.

18 A. Yes. Most likely if he told me that he  
19 couldn't tell me the names of his medications, he  
20 told me he's on blood pressure medication.

21 Q. So you filled that in?

22 A. All I can do is write down what they tell me.

23 Q. That's fine. I'm just trying to figure out  
24 mechanically how this all occurred.

25 A. Yup, I put that in.

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1           A.    You get the closest thing -- in that case  
2           that's what it was.

3       Q.    Is there a definition of suicidal ideation for the  
4           person?

5           A.    The person believes they want to commit  
6           suicide, or ideas of suicide.

7       Q.    You base that on Mr. Caniglia having supposedly  
8           told his wife to shoot him?

9           A.    That's correct.   Twice.

10      Q.    Did you ask Mr. Caniglia whether he actually  
11           wanted his wife to shoot him?

12           A.    Did I ask him?   I can't remember if I asked  
13           him or if he told me.   He told me he wanted her to  
14           shoot him because he stated it.   He said it.

15      Q.    Do you know if he gave -- the gun he gave her was  
16           loaded?

17           A.    No idea.

18      Q.    If the gun wasn't loaded, would that indicate to  
19           you that he did not really want his wife to shoot  
20           him?

21                           MR. CUNNINGHAM: Objection.

22           A.    No idea.

23      Q.    Have you ever heard somebody say, just shoot me  
24           now?

25           A.    Yes.

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1 Q. Okay. And you always assume that that means they  
2 want someone to shoot them?

3 A. Why would you say it? That's not up to me  
4 how they mean it. If they say shoot me now, I  
5 take it as a threat.

6 Q. So, you did not make a determination as to whether  
7 or not Mr. Caniglia really wanted his wife to  
8 shoot him, you just assumed because he said it  
9 that he wanted that, is that fair?

10 A. Yes. He said he wanted her to shoot him.

11 Q. Have you ever seen a police incident report?

12 MR. CUNNINGHAM: Objection.

13 THE WITNESS: For this run?

14 MR. LYONS: Yes.

15 A. No.

16 Q. Apart -- let me withdraw that question. Which  
17 police officer spoke to you at the scene?

18 A. No idea. There is a lot of police officers.  
19 I don't know them all.

20 Q. Did you recognize this police officer?

21 A. Don't remember. I couldn't tell who this  
22 patient was if he was standing in front of me.  
23 It's three years ago.

24 Q. Do you know Officer Brendan Barth?

25 A. Maybe by sight. Just name, no.

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1 Q. In your training as a paralegal --

2 THE WITNESS: Paralegal?

3 Q. In your training as a paramedic, had you ever used  
4 the phrase or heard the phrase totality of the  
5 circumstances?

6 A. I'm not sure.

7 Q. With respect to considering whether or not  
8 somebody was a risk factor for suicide, has any  
9 instructor ever told you or used the phrase  
10 totality of the circumstances?

11 A. Unsure.

12 MR. LYONS: I have no further  
13 questions.

14 MR. CUNNINGHAM: I have one more.  
15 When you go on a call and you evaluate in your  
16 mind whether someone is suicidal, you consider all  
17 the information, all the circumstances that  
18 present themselves to you; is that correct?

19 THE WITNESS: That's correct.

20 MR. LYONS: Objection.

21 MR. CUNNINGHAM: I don't have  
22 anything else.

23 FURTHER EXAMINATION BY MR. LYONS (CONT.)

24 Q. When you were with Mr. Caniglia, besides the fact  
25 that he had supposedly made the statement that he

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1           wanted his wife to shoot him, did you consider any  
2           other factor in concluding whether or not he was  
3           suicidal?

4           A.    I was told he had a gun.  Besides that, him  
5           stating he had a gun, he wanted his wife to shoot  
6           him; that's all I needed.

7                       MR. LYONS: Thank you.

8                       (DEPOSITION CLOSED AT 11:52 A.M.)

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