

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Jermaine Wilson,)
)
)
Plaintiff,)
) 14-cv-8347
-vs-)
) (Judge Lee)
City of Evanston, Illinois,)
)
)
Defendant.)

PLAINTIFF SANDERS' INTERROGATORY ANSWERS

The undersigned, under penalties of perjury as provided by law, certifies that the following interrogatory answers are true:

1. State your full name, any alias names used by you, your residence address at the time of your subject arrest in this litigation, your current residence address, date of birth, marital status, driver's license number and issuing state, state identification number (if no driver's license), and social security number.

Response: My name is Dameon Sanders. My current address is [REDACTED] Darrow, Evanston, Illinois. I was born on [REDACTED] 1980. I am unmarried. My driver's license number is S [REDACTED]. My Illinois state id number is [REDACTED] s. My social security number is [REDACTED]-0304.

2. Identify all persons: who assisted you in responding to or preparing your responses to these Interrogatories; who responded or supplied information used to answer these Interrogatories; and whose documents, communications, or files were consulted in the preparation of your responses to these Interrogatories.

Response: I answered these interrogatories with the assistance of counsel.

3. Identify any civil action (other than this lawsuit) or administrative complaint or charge (other than involving this lawsuit) you have been involved in as a plaintiff, defendant, or class representative.

Response: None.

4. Concerning your personal property inventoried by the City on or about July 25, 2013 and allegedly not recovered, as alleged in Paragraphs 23 and 27 of the Second Amended Complaint, identify with specificity:

- a. The items of property you, your representative, or agent did not recover from the Evanston Police Department and the specific make, model, type, and brand (as appropriate for the type of property) of each such property;
- b. The store, retailer, or other source from which you allegedly purchased the alleged unrecovered property;
- c. The date(s) or approximate date(s) that you purchased the alleged unrecovered property;
- d. Your estimated value of the alleged unrecovered property at the time that was inventoried and how you calculate such value; and
- e. Any documents of any kind (e.g., receipts, bank statements, credit card statements, and/or invoices) showing that you purchased the property, the property's purchase price, and/or that it was purchased and later gifted or otherwise given to you. Produce any such documentation in your possession.

Response: a) Two cell phones, Belt, CTA cards, prepaid debit card, and link card.

b) I bought one of the phones through Craigslist. I believe that the other phone was a gift from my then girlfriend.

c) I do not recall when I acquired that material.

d) The debit card had about \$500 on it. At the time of my arrest, one of my phones was worth several hundred dollars.

e) None.

5. State with specificity every and all affirmative steps and/or measures (other than participating in this litigation) taken and/or attempted by you, any family or friends authorized or designated by you, your representative, agent, and/or any other person authorized by you, to recover your personal property identified in Interrogatory No. 4.

Response: I sent my father to pick up my stuff. He told me that the police would not release my property to him.

6. State in detail the circumstances related to your arrest by the Evanston Police Department on or about July 25, 2013, as alleged in the Second Amended Complaint, including but not limited to, charges filed against you, and any and all oral conversations had and/or written communications you received from

police officers or police staff (including specifying the identify of said officers or staff) regarding your arrest, personal property, and transfer of custody to the Cook County Sheriff.

Response: To the best of my current recollection, I was arrested outside of my home by two Evanston police officers who told me that I had made a false police report. I do not know the names of my police officers.

7. Identify all instances where you have been arrested by the Evanston Police Department (including misdemeanors and/or City Code violations) prior and/or subsequent to the July 25, 2013 arrest alleged in the Second Amended Complaint? For each arrest, identify with specificity: (a) the date of the arrest; (b) the charges filed against you; (c) any and all of your personal property inventoried by the City; and (d) any documents or communications received from the City regarding your inventoried personal property, including retrieval of this property.

Response: I do not recall the precise number of other times I have been arrested by officers of the Evanston police department.

8. For each and every instance of arrest identified in response to Interrogatory No. 7, state with specificity:

- a. Whether you were able to recover your personal property inventoried by the Evanston Police Department. If you recovered such property, specify the property recovered. If you were unable to recover such property, specify the property not recovered;
- b. Your custody status at the time of property recovery or non-recovery (e.g., in custody of the Cook County Sheriff, Cook County Department of Corrections, Illinois Department of Corrections, rehabilitation facility or medical facility, and/or out on bond);
- c. The means and methods by which you were able to recover your property, including the identity of any of your family or friends, your public defender or criminal defense attorney, your representative, your agent, and/or any other person authorized by you to recover the property; and
- d. The date of property recovery.

Response: Every time I have been locked up for less than a month or so, I was able to go back to Evanston and retrieve my property. I do not recall the dates when I did this. On other cases, when my stay at the Jail was long, I of retrieving my property.

9. State with specificity each and every element of actual damages and any and all other expenses or losses claimed by you as a result of the City's alleged conduct as alleged in the

Second Amended Complaint, including but not limited to, the amount attributed to each element and the manner of calculating each such amount, and receipts showing the make, brand, monetary value of your personal property items at issue. For this Interrogatory, also identify all documents and communications that support your claims for actual damages, losses, and expenses.

Response: The prepaid debit card had a value of about \$500. I do not have any receipts.

10. Identify whether you had any social networking accounts during the time of the July 25, 2013 arrest alleged in the Second Amended Complaint, including but not limited to, accounts on Facebook, Google +, Instagram, Twitter, MySpace, LinkedIn, and Livejournal. If so, please state the social networking site(s) you belong to, your profile name(s), whether you posted any information to any of these sites concerning the allegations contained in the Second Amended Complaint, and whether you still have the social networking account(s).

Response: To the best of my present recollection, I have not posted anything on any social media account relating to this lawsuit.

Dated: October 1, 2016



Dameon Sanders