

EXHIBIT 3



Transcript of the Deposition of
Allison D. Redlich, Ph.D.

Case: Ben Baker, et al. v. City of Chicago, et al.
Taken On: April 25, 2024

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 1

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

BEN BAKER and CLARISSA)
GLENN,)
Plaintiffs,)
-vs-) No. 16 CV-8940
CITY OF CHICAGO, et al.,)
Defendants.)

The videotaped deposition of ALLISON D. REDLICH, PH.D., called for examination, taken via videoconference, taken pursuant to the Federal Rules of Civil Procedure of the United States District Courts pertaining to the taking of depositions, taken before KAREN A. FAZIO, CSR No. 84-1834, a Notary Public within and for the County of Cook, State of Illinois, and a Certified Shorthand Reporter of said state, on the 25th day of April, 2024, commencing at 9:00 a.m.

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 2

1 REMOTE APPEARANCE:

2 LOEVY & LOEVY,
3 311 North Aberdeen Street, 3rd Floor
4 Chicago, Illinois 60607
5 (312) 243-5900
6 MS. THERESA H. KLEINHAUS

7 appeared on behalf of the Coordinated
8 Plaintiffs;

9

10 LAW OFFICES OF KENNETH N. FLAXMAN, P.C.
11 200 South Michigan Avenue, Suite 201
12 Chicago, Illinois 60604
13 (312) 427-3200)
14 MR. JOEL A. FLAXMAN
15 MR. KENNETH N. FLAXMAN

16 appeared on behalf of the Coordinated
17 Plaintiffs;

18

19 HALE & MONICO, LLC
20 53 West Jackson Boulevard, Suite 334
21 Chicago, Illinois 60604
22 (312) 341-9646
23 MR. WILLIAM E. BAZAREK

24

25 appeared on behalf of the Individual
26 Defendants;

27

28 BURNS NOLAND
29 311 South Wacker Drive, Suite 5200
30 Chicago, Illinois, 60606
31 (312) 982-0090
32 MS. ELIZABETH A. EKL

33

34 appeared on behalf of the Coordinated
35 Defendants;

36

37

38

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 3

1 PRESENT: (Continued)
2 JOHNSON & BELL, LTD.
3 33 West Monroe Street
4 Suite 2700
5 Chicago, Illinois 60603
6 (312) 372-0770
7 MS. ALEEZA F. MIAN
8
9 appeared on behalf of Defendant Ronald
10 Watts;
11
12
13
14
15
16
17
18
19
20
21
22 REPORTED BY: KAREN A. FAZIO, CSR
23 CSR No. 84-1834
24 VIDEOGRAPHER: CHRISTOPHER ZYVERT

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 4

| | | |
|---|---------------------------|-------------|
| 1 | I N D E X | |
| 2 | ALLISON D. REDLICH, PH.D. | EXAMINATION |
| 3 | BY MR. BAZAREK | 6, 229 |
| 4 | BY MR. SULLIVAN | 181 |
| 5 | BY MS. EKL | 212 |
| 6 | | |
| 7 | | |

| | | |
|----|-----------------|---------------|
| 8 | E X H I B I T S | |
| 9 | EXHIBIT | MARKED FOR ID |
| 10 | No. 1 | 95 |
| 11 | No. 2 | 171 |
| 12 | No. 3 | 173 |
| 13 | | |
| 14 | | |
| 15 | | |
| 16 | | |
| 17 | | |
| 18 | | |
| 19 | | |
| 20 | | |
| 21 | | |
| 22 | | |
| 23 | | |
| 24 | | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 5 | Page 7 |
|---|--|
| <p>1 THE VIDEOGRAPHER: For the record, my name is 2 Christopher Zyvert from Video Instanter, the video 3 recording device operator for this deposition. The 4 business address is 134 North LaSalle Street, 5 Suite 1400, Chicago, Illinois 60602.</p> <p>6 This deposition is being video-recorded 7 pursuant to the Federal Rules of Civil Procedure 8 and other applicable state and local rules.</p> <p>9 This is the video-recorded deposition of 10 Dr. Allison Redlich in the matter of Baker, et al. 11 versus City of Chicago, et al., Case No. 16-CV-8940 12 in the United States District Court for the 13 Northern District of Illinois, Eastern Division.</p> <p>14 Today's date is April 25th, 2024, and 15 the time is 9:07 a.m.</p> <p>16 This deposition is being taken on behalf 17 of the defendant, and being recorded at the 18 instance of the defendant.</p> <p>19 Will the attorneys present please 20 introduce themselves for the record?</p> <p>21 MS. KLEINHAUS: Good morning. Theresa 22 Kleinhaus, appearing on behalf of the Loevy 23 plaintiffs.</p> <p>24 MR. JOEL FLAXMAN: Joel Flaxman for the</p> | <p>1 police officers that Ben Baker and Clarissa Glenn 2 are suing.</p> <p>3 And how are you today?</p> <p>4 A. I'm good. But it's Dr. Redlich, not Ms.</p> <p>5 Q. Are you a medical doctor?</p> <p>6 A. No.</p> <p>7 Q. Dr. Redlich, what kind of doctor are 8 you?</p> <p>9 A. I have my Ph.D. in psychology.</p> <p>10 Q. Are you a clinician?</p> <p>11 A. No.</p> <p>12 Q. Can you prescribe medicine?</p> <p>13 A. No.</p> <p>14 Q. Can you make assessments over someone's 15 cognitive ability?</p> <p>16 A. I was not trained to do that, no. I do, 17 though, make assessments in a research capacity, 18 but not in a clinical capacity.</p> <p>19 Q. Now I know you've given a deposition 20 before at least in the Alvin Waddy case, right?</p> <p>21 A. Yes.</p> <p>22 Q. And Alvin Waddy is a drug dealer, right?</p> <p>23 MS. KLEINHAUS: Objection to form, foundation.</p> <p>24 It's argumentative.</p> |
| <p style="text-align: center;">Page 6</p> <p>1 Flaxman plaintiffs.</p> <p>2 MR. BORKAN: Steve Borkan for Ridgell.</p> <p>3 MR. BAZAREK: William Bazarek for the 4 individual defendants represented by Hale & Monico.</p> <p>5 MS. MIAN: Good morning. Aleeza Mian for 6 Watts.</p> <p>7 MS. EKL: Good morning. Elizabeth Ekl for the 8 City of Chicago.</p> <p>9 MR. SULLIVAN: Sean Sullivan for Kallatt 10 Mohammed.</p> <p>11 THE VIDEOGRAPHER: Will the court reporter 12 please introduce yourself and swear in the witness?</p> <p>13 THE COURT REPORTER: My name is Karen Fazio. 14 I'm with Royal Reporting.</p> <p>15 Will you please raise your right hand?</p> <p>16 (WHEREUPON, the witness was duly 17 sworn.)</p> <p>18 ALLISON D. REDLICH, PH.D., 19 called as a witness herein, having been first duly 20 sworn, was examined and testified remotely as follows:</p> <p>21 EXAMINATION</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. Good morning, Ms. Redlich. My name is 24 William Bazarek. I represent a number of the</p> | <p style="text-align: center;">Page 8</p> <p>1 THE WITNESS: Am I supposed -- should I answer 2 that question?</p> <p>3 MS. KLEINHAUS: You can answer that question 4 to the extent that you know.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I have no idea if he's a drug dealer or 7 not.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Did you ever review his arrest history?</p> <p>10 A. I can't recall. If it was on my report 11 in Appendix A, then I did, but I don't recall. I 12 didn't realize we were going to be talking about 13 Alvin Waddy today.</p> <p>14 Q. Tell me, other than the Waddy case, 15 where else have you been deposed, Doctor?</p> <p>16 A. For guilty plea cases?</p> <p>17 Q. Any time you've been deposed.</p> <p>18 A. It's -- there haven't been that many 19 times, but I don't know off the top of my head. 20 I've been serving as an expert witness in contested 21 confession and guilty plea cases, largely 22 confession cases, since 2004, but I don't do it 23 very often.</p> <p>24 Q. Okay. And I know you've been deposed in</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 9</p> <p>1 the past, but I'll just go over a few ground rules 2 with you. 3 If there's any question that I ask you 4 today that you don't understand, can you let me 5 know right away and I'll rephrase it? Okay? 6 A. Okay. 7 Q. I'm also going to assume, Doctor, that 8 if you answer any questions today that you 9 understood the questions. Is that fair? 10 A. Yes. I will ask for clarification if I 11 don't understand or if it later becomes apparent 12 that I didn't understand. I may believe that I 13 understood you at first, but then it may become 14 apparent that I didn't. 15 Q. Right. Any time today, if you think you 16 misspoke, you can clarify your answer. Okay? 17 A. Okay. 18 Q. Okay. And, Doctor, can you remember to 19 do that before this deposition concludes? 20 A. Yes. 21 Q. Okay. And I just -- I want to make sure 22 that any answers that you give, it's to questions 23 that you understood. Is that fair? 24 A. I will do my best.</p> | <p style="text-align: center;">Page 11</p> <p>1 A. Yes. 2 Q. And are there other cases that you've 3 been retained by the Loevy & Loevy firm? 4 MS. KLEINHAUS: I'm just going to object and 5 direct her not to answer for any cases in which you 6 haven't already been disclosed with the report 7 that's been produced. That's work product that you 8 shouldn't talk about in your answer. 9 But to the extent you can answer without 10 that, go ahead. 11 BY THE WITNESS: 12 A. Can you repeat the question, please? 13 MR. BAZAREK: Can you read it back, please, 14 Ms. Court Reporter? 15 (WHEREUPON, the record was read by 16 the reporter.) 17 BY THE WITNESS: 18 A. Not in the recent past. 19 BY MR. BAZAREK: 20 Q. Well, I'm not just talking about the 21 recent past. You said you've been consulting on 22 contested confession cases since 2004. 23 Do I have that right, Doctor? 24 A. Yes.</p> |
| <p style="text-align: center;">Page 10</p> <p>1 Q. Okay. Are you being compensated today 2 for this deposition? 3 A. I believe so. I haven't submitted a 4 bill. 5 Q. Okay. To date, what have -- how much 6 have you made in your review of the Ben Baker and 7 Clarissa Glenn case? 8 MS. KLEINHAUS: Objection to form. 9 You can answer. 10 BY THE WITNESS: 11 A. I have not received any money to date. 12 I submitted a bill last week or the week before, 13 but I have not received it yet. 14 BY MR. BAZAREK: 15 Q. Okay. And what was the invoice for -- 16 strike that. 17 Doctor, what's the amount of the unpaid 18 bill that you submitted? 19 A. I think it was about \$4,687.50, is my 20 recollection. 21 Q. Okay. And you've been hired by the 22 Loevy & Loevy firm on other cases, right? 23 A. Yes. 24 Q. And there's the Waddy case, right?</p> | <p style="text-align: center;">Page 12</p> <p>1 Q. Okay. So since 2004 -- 2 A. There's one case that I can think of, 3 and that's it. 4 MS. KLEINHAUS: And I would just direct you, 5 again, to the extent you were a consulting expert 6 versus an expert who is disclosed and offered a 7 report, you shouldn't offer information about that. 8 BY MR. BAZAREK: 9 Q. Can you answer the question? 10 A. I'm not sure what the question is, and 11 you've asked me very clearly to indicate when I'm 12 confused. I'm confused. 13 Q. Okay. So I was asking you about cases 14 where you've been retained by the Loevy & Loevy 15 firm. 16 Do you understand that, Doctor? 17 A. Yes. 18 Q. And we've already talked about the Waddy 19 case. You were retained in that case, correct? 20 A. Yes. 21 Q. You gave opinions, correct? 22 A. Yes. 23 Q. And you were paid for the opinions that 24 you gave, correct?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: center;">Page 13</p> <p>1 A. Yes.</p> <p>2 Q. Okay. So -- and then I asked you about 3 other cases. You said something along the lines of 4 not in the recent past.</p> <p>5 Do you remember you said that just about 6 three minutes ago?</p> <p>7 A. Yes, I do.</p> <p>8 Q. Okay. So you just were talking about 9 there was another case. When -- what is the time 10 frame of this other case when you were retained by 11 Loevey & Loevy?</p> <p>12 A. My estimated guess is the early 2010s.</p> <p>13 Q. Okay. And what was the name of that 14 case?</p> <p>15 MS. KLEINHAUS: I would just direct you, again, if that's a case that you were only consulting on versus being a retained expert, you shouldn't discuss any of your consulting.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I was paid, but I did not provide any deposition or testimony in court.</p> <p>18 BY MR. BAZAREK:</p> <p>19 Q. Okay. How much were you paid?</p> <p>20 A. I would have to go back and check my</p> | <p style="text-align: center;">Page 15</p> <p>1 case from the 2010s, you don't know as to whether 2 or not that report was disclosed to the parties? 3 Is that your testimony?</p> <p>4 A. I don't know with any certainty, no.</p> <p>5 Q. Okay. Was it a final report or a draft 6 report?</p> <p>7 A. I believe it was a final report.</p> <p>8 THE COURT REPORTER: I'm sorry. I didn't get 9 the objection.</p> <p>10 MS. KLEINHAUS: Objection, form and foundation.</p> <p>11 BY MR. BAZAREK:</p> <p>12 Q. Do you understand the question?</p> <p>13 A. I'm sorry. I believe I answered it.</p> <p>14 I believe it was a final report.</p> <p>15 Q. Okay. And it was a report that you 16 signed off on, correct?</p> <p>17 A. Yes.</p> <p>18 MS. KLEINHAUS: Objection to form.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. And then that report was provided to the 21 attorneys at the Loevy & Loevy firm, is that 22 correct?</p> <p>23 A. Yes.</p> |
| <p style="text-align: center;">Page 14</p> <p>1 records. I have no idea.</p> <p>2 Q. Do you have records somewhere that would 3 reflect how much you were paid?</p> <p>4 A. I believe so, yes.</p> <p>5 Q. Okay. So other than that one case that 6 you've now testified that you didn't do a report, 7 you didn't testify in, and then Waddy --</p> <p>8 A. To clarify, I did do a report. I did not give a deposition or testify in court, but I did produce a report.</p> <p>9 Q. Was the report disclosed by the 10 plaintiff in that particular case?</p> <p>11 A. I'm not a lawyer, and I don't know what that means, and I have no idea.</p> <p>12 Q. Okay. Well, you know you did a report 13 in this case, right?</p> <p>14 A. Yes.</p> <p>15 Q. And are you aware that your report was 16 actually disclosed to the other parties in this 17 case, or you don't know that?</p> <p>18 A. I do know that because we are having a deposition, and I believe that you're going to be asking me questions about my report.</p> <p>19 Q. Okay. And so -- but going back to the</p> | <p style="text-align: center;">Page 16</p> <p>1 Q. Okay. Well, one of the things -- 2 Doctor, at any time, I know you're a busy doctor, 3 if you need to take a break or anything like that, 4 you can do so. Just let us know, okay?</p> <p>5 A. Okay.</p> <p>6 Q. And, by the way, where are you today?</p> <p>7 A. I am in Fairfax, Virginia.</p> <p>8 Q. And that's a northern suburb of DC, is 9 that correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Is it near Falls Church, 12 Virginia?</p> <p>13 A. Yes, I believe so.</p> <p>14 Q. Okay. And are you -- you're a 15 scientist?</p> <p>16 A. Yes.</p> <p>17 MS. KLEINHAUS: Objection to form.</p> <p>18 BY MR. BAZAREK:</p> <p>19 Q. When did you become a scientist?</p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I guess I would say when I received my Ph.D. in 1999, but I was doing science as a doctoral student and as a research assistant before</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 17 | Page 19 |
|---|--|
| <p>1 that.</p> <p>2 BY MR. BAZAREK:</p> <p>3 Q. And what is your Ph.D. in?</p> <p>4 A. Psychology.</p> <p>5 Q. Any particular specialty in psychology,</p> <p>6 or just psychology in general?</p> <p>7 A. Yes, it's developmental psychology.</p> <p>8 Q. And to get a Ph.D., do you have to</p> <p>9 prepare papers?</p> <p>10 A. I don't know what you mean by "prepare</p> <p>11 papers." Please, clarify.</p> <p>12 Q. How do you become a Ph.D.? What did you</p> <p>13 have to do?</p> <p>14 A. Well, there are many things, but the</p> <p>15 primary thing is to write a dissertation -- to</p> <p>16 conduct research and -- your dissertation research,</p> <p>17 and write up your dissertation, and defend it</p> <p>18 before a committee.</p> <p>19 Q. And what was the topic of your</p> <p>20 dissertation that led you to becoming a Ph.D.?</p> <p>21 A. It was comparing juveniles ages 12 and</p> <p>22 13, and 16 and 17, to young adults using the lab</p> <p>23 experiment and looking at their likelihood of</p> <p>24 providing a false confession to a -- what we called</p> | <p>1 and their likelihood of signing that confession,</p> <p>2 that statement.</p> <p>3 Q. And what were the results of this --</p> <p>4 A. Experiment.</p> <p>5 Q. -- study that you did with the</p> <p>6 adolescents and the college kids?</p> <p>7 A. We found that the adolescents were more</p> <p>8 likely to take responsibility for crashing the</p> <p>9 computer than the young adults, especially when we</p> <p>10 presented them with the printout demonstrating that</p> <p>11 they had indeed hit the ALT key.</p> <p>12 Q. How long did the study take where you</p> <p>13 were literally with the adolescents and the college</p> <p>14 kids?</p> <p>15 A. Do you mean the individual sessions, or</p> <p>16 how long it took me to collect all of the data?</p> <p>17 Q. Yeah, that's -- yeah, that's a good --</p> <p>18 let me clarify.</p> <p>19 Was the study done on just one day with</p> <p>20 all the participants, the adolescents and the</p> <p>21 college kids?</p> <p>22 A. No. It was -- we brought in each</p> <p>23 participant one by one, and it would have taken</p> <p>24 over a year, I would estimate. It's been so long,</p> |
| Page 18 | Page 20 |
| <p>1 a mock crime.</p> <p>2 Q. And can you just describe how you went</p> <p>3 about doing that?</p> <p>4 A. Sure. This was about 25 years ago now,</p> <p>5 but I'll do my best.</p> <p>6 So we brought young adults, college</p> <p>7 students, and adolescents, the ages that I just</p> <p>8 mentioned, into the laboratory, and they were</p> <p>9 seated at a computer. And they were told that they</p> <p>10 were participating in a study looking at reaction</p> <p>11 time, and I think it was memory, and the -- at some</p> <p>12 point -- they're told not to hit the ALT key on the</p> <p>13 computer while they're doing this test because the</p> <p>14 computer might crash. And then the computer</p> <p>15 crashes, and they're accused of hitting the ALT</p> <p>16 key. And half of the participants are shown a</p> <p>17 document with their key strokes, one of them</p> <p>18 indicating that they hit the ALT key, and the other</p> <p>19 half are not shown this document. And then they're</p> <p>20 asked to sign a statement taking responsibility for</p> <p>21 crashing the computer.</p> <p>22 And we looked at the rates of 12- and</p> <p>23 13-year-olds, and 15 and 16 -- 15- to 17-year-olds,</p> <p>24 and 15- and 16-year-olds, and then college students</p> | <p>1 I don't remember the details.</p> <p>2 Q. Okay. And then how many -- excuse me.</p> <p>3 How many -- is it participant? Is that</p> <p>4 the right word for the adolescents and the college</p> <p>5 kids?</p> <p>6 A. Yes.</p> <p>7 Q. How many participants were there in this</p> <p>8 study?</p> <p>9 A. I'm going to estimate over 100. I would</p> <p>10 need to go back and look at the article that I</p> <p>11 published the study in. I don't recall.</p> <p>12 Q. Okay. But in terms of the participants,</p> <p>13 it was over a year period? Do I have that right?</p> <p>14 A. I believe so, yes.</p> <p>15 Q. Okay. And then how long after you</p> <p>16 completed the study did you finish your</p> <p>17 dissertation?</p> <p>18 A. I defended my dissertation and received</p> <p>19 my Ph.D. in August of 1999.</p> <p>20 Q. Okay.</p> <p>21 A. And so it would have been soon</p> <p>22 thereafter. I published the study in 2003,</p> <p>23 although there's -- yeah.</p> <p>24 Q. And then the participants, did they --</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 21</p> <p>1 did the participants -- did that begin in 1998 2 going into '99, or was it even earlier than that? 3 A. I believe it was earlier than that. I 4 would say 1997.</p> <p>5 Q. Okay. Have you ever done a study like 6 that with people in their thirties? 7 A. Like that specifically?</p> <p>8 Q. Yes. 9 A. No.</p> <p>10 Q. Okay. Have you ever done any studies 11 with individuals that are in their thirties? 12 A. Yes.</p> <p>13 MS. KLEINHAUS: Objection to form. 14 BY MR. BAZAREK:</p> <p>15 Q. What studies have you done with people 16 in their thirties? 17 A. Well, we've done studies where -- I 18 published one recently where we observed guilty 19 plea hearings in criminal court and juvenile court, 20 and many of the defendants in that study were in 21 their thirties, and we observed over 800 plea 22 hearings, almost 600 in the criminal court, and 23 then we interviewed 96 of those adult defendants, 24 and many of them were in their thirties.</p> | <p style="text-align: center;">Page 23</p> <p>1 information. Is this going to be confidential? I 2 mean, we have human subjects review boards, and, 3 you know, that's something that I -- we don't 4 disclose and that we promised the sites 5 confidentiality.</p> <p>6 Q. Well, when you attended these court 7 hearings, it was open to the public, right? 8 A. Yes, but we've now published those data.</p> <p>9 Q. Okay. I'm not asking for people's names 10 of who you studied. 11 A. I understand.</p> <p>12 Q. Okay. So, you know, first off, I don't 13 think this is private information of any sort. So 14 I don't know -- 15 Do you have any thoughts on this, Tess? 16 MS. KLEINHAUS: So my understanding is that in 17 order to be able to conduct the study, it's likely 18 that these locations -- these courthouse locations 19 were promised confidentiality about where 20 specifically it happened. I wonder if she could 21 perhaps tell you, like, generally the geographic 22 area of where they conducted it, if that would 23 satisfy the confidentiality for the study and 24 answer your question.</p> |
| <p style="text-align: center;">Page 22</p> <p>1 Q. And then what was the time frame for 2 that study? 3 A. Are you asking me when we collected the 4 data?</p> <p>5 Q. Well, you talked about -- yeah. Okay. 6 I'll clarify. 7 You actually attended criminal court 8 proceedings? Do I have that right? 9 A. I -- we systematically observed plea 10 hearings in criminal court, circuit court, and in 11 two juvenile courts. And I attended many of the 12 plea hearings, and I did some of the coding, but I 13 did not attend all 800-plus of these plea hearings.</p> <p>14 Q. How many plea hearings did you actually 15 attend, Doctor? 16 A. I'm going to estimate -- do you want an 17 estimate? Because I have no idea what the actual 18 number is.</p> <p>19 Q. Yes, sure. 20 A. Okay. I'm going to estimate that I 21 attended 200.</p> <p>22 Q. And what courthouse or courthouses did 23 you attend these approximately 200 hearings? 24 A. I don't usually disclose that</p> | <p style="text-align: center;">Page 24</p> <p>1 MR. BAZAREK: Yeah, well, let's try that. 2 BY MR. BAZAREK:</p> <p>3 Q. Can you say, like, what -- what county 4 this -- 5 A. That's exactly what I don't want to say. 6 It's in the article is -- we call it Virginia.</p> <p>7 Q. Okay. 8 A. So the criminal court and one of the 9 juvenile courts were in Virginia, and the other 10 juvenile court was in California.</p> <p>11 Q. Okay. So two locations, Virginia and 12 California? 13 A. The criminal court was only Virginia, 14 with the 30-year-olds.</p> <p>15 Q. Gotcha. Okay. 16 A. And -- can I add something?</p> <p>17 Q. Go ahead. 18 A. So I would have to go and look at my -- 19 there are studies that I've done because I've done 20 a lot of studies on guilty pleas and false 21 confessions, a lot of research over time, but I'm 22 sure that I've done many studies with 30-year-olds. 23 I just gave you one example.</p> <p>24 Q. Okay. And what was the time frame for</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 25</p> <p>1 this study that we're talking about involving 2 Virginia courts and California courts? 3 A. Again, so to clarify, do you mean the 4 period of -- over the time we collected the data? 5 Q. Let's focus in on this. You have 6 testified that you attended approximately 200 court 7 proceedings where people pled to crimes, is that 8 correct? 9 A. Yes. 10 Q. Okay. So let's focus on that. 11 What's the time frame for the 200 court 12 proceedings that you attended in person? 13 A. Would you like me to check the article 14 that I published? 15 Q. Sure, sure. 16 A. Okay. So -- 17 Q. And can you just tell us what article it 18 is you're reading from? 19 A. Sure. It's -- well, one is the -- I 20 don't have that with me. The Dezember, et al. 21 article from -- we published that in 2022, I 22 believe. It might have been 2021. And the other 23 one was Redlich, et al., and that was published in 24 late 2022.</p> | <p style="text-align: center;">Page 27</p> <p>1 different courtrooms. Obviously, only one person 2 could be in one courtroom at a time. The juvenile 3 pleas were a little bit different. 4 Q. Right. And I want to focus now just on 5 the 30-somethings that you were talking about. 6 A. Okay. 7 Q. So -- and you would have a colleague 8 attend court with you, and they would cover a 9 different courtroom? 10 A. We had a whole research team. So I 11 believe there were six courtrooms. You know, we 12 might have four to six people, like me and three to 13 five other people. 14 Q. Okay. But would you have multiple 15 people as part of your team in the same courtroom, 16 or you'd go to different courtrooms? 17 A. Both. So there is something called 18 interrater reliability to make sure that we're 19 coding the same thing. So on at least about -- I'm 20 sorry. Again, it's in the article. You want me to 21 look in the article about what percentage? 22 Q. Sure. 23 A. 34 percent of the criminal court 24 hearings that we observed were observed by two</p> |
| <p style="text-align: center;">Page 26</p> <p>1 I'm sorry. Let me be more specific. So 2 the Redlich, et al. is called Guilty Plea Hearings 3 in Juvenile and Criminal Court, and that was 4 published in Law and Human Behavior. Let me see if 5 I can find when -- okay. So all observations took 6 place between January 2017 and August 2018. 7 THE COURT REPORTER: Excuse me. Can you spell 8 that first name for me? December, did you say? 9 THE WITNESS: Yes, it's like December with a 10 Z. So it's D-E-Z-E-M-B-E-R. 11 BY MR. BAZAREK: 12 Q. So going back to these -- you know, let 13 me ask this question. Strike that question. 14 Where you talked about the 200 court 15 proceedings, would that be 200 separate proceedings 16 on different days, or you could go to court on one 17 day, for instance, and watch, you know, 20 pleas 18 take place, 30 pleas take place, something like 19 that? 20 A. For the criminal court, they had a plea 21 day, and it was morning to afternoon. And so we 22 did watch multiple pleas on that -- on Thursdays, I 23 believe. And so we could have seen, I don't know, 24 ten to 20 -- ten pleas maybe. We were sitting in</p> | <p style="text-align: center;">Page 28</p> <p>1 people -- at least two people. 2 Q. Okay. So the individuals that -- and, 3 again, I'm keeping with the 30-somethings. I'm not 4 asking about juveniles, but the 30-somethings that 5 you observed in a Virginia courthouse somewhere, 6 what did you know about those individual cases 7 where someone was taking a plea? 8 A. Only what we observed in court. 9 However, we interviewed close to 100 of those adult 10 defendants. And I don't want to give the 11 impression that all of them were in their thirties. 12 They ranged from 18 to -- let me try and see. 13 Yeah, I don't remember. Their mean age 14 was 32 years. And so I know that many of them were 15 in their thirties. 16 Q. Okay. And so would you -- you said it 17 was approximately 100 that you were able to talk 18 to? 19 A. Yes. 20 Q. And when you say 100, is that your whole 21 group? Because I know you had a team. Or is it 22 just you, Dr. Redlich, is talking to 100 people 23 that have pled guilty to some crime? 24 A. I did not conduct all the interviews</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: right;">Page 29</p> <p>1 myself. I conducted a portion of them. 2 Q. Okay. So out of the 100, how many 3 interviews did you yourself conduct? 4 A. This is an estimate. I'm going to say 5 25. 6 Q. And how is it that one of these 7 individuals who pled guilty would agree to talk to 8 you, Doctor? 9 MS. KLEINHAUS: Objection to form. 10 You can answer. 11 BY THE WITNESS: 12 A. We asked them if they wanted to 13 participate in the research, and those people that 14 we interviewed said yes. 15 BY MR. BAZAREK: 16 Q. Okay. And so do you make the ask before 17 they plead guilty or after they plead guilty? How 18 does that work? 19 A. In this study, it was after they pled 20 guilty. 21 Q. So do you -- I'm just trying to 22 understand how you get their agreement that they're 23 going to talk to you. Do you walk up to them, hey, 24 do you have a moment, sir? You just pled guilty.</p> | <p style="text-align: right;">Page 31</p> <p>1 to them and asked them if they were interested in 2 participating in research. Those we mostly would 3 just get contact information and contact them a few 4 days later, after their plea. Some people wanted 5 to get interviewed right after their plea, but I 6 would say most in the community did not. 7 Q. Okay. Were they paid to participate in 8 this study? 9 A. Let me check my records. I can't 10 remember -- I'm sorry. I would have to do a little 11 more digging, but my recollection is that the 12 people in custody were not paid because the jail 13 did not want us to pay them, and even just putting 14 money in their canteen or something like that. I 15 think the people in the community, which was about 16 15 percent of the sample -- most of them were in 17 custody -- I do believe we paid them. And I think 18 it was about \$40 or \$50. 19 Q. Okay. And when you would do the 20 interviews, whether it was people that were in the 21 county jail or that were on the outside, so to 22 speak, would the interview be done in one session? 23 A. Yes, it took about an hour. 24 Q. Okay. Tell me -- as a scientist, a</p> |
| <p style="text-align: right;">Page 30</p> <p>1 Can I talk to you? Do you talk to their attorney 2 to see if the attorney wants to talk to the person? 3 How does it work? 4 A. So the people who were not sentenced 5 to -- I'm sorry. A portion of our interviewees 6 were in jail pre- and post their plea. And so some 7 people were sentenced the same day, but most, I 8 would say, were sentenced about a month later, 9 after their plea. 10 And so for those people who were in the 11 county jail, we received permission. We worked 12 with the jail, they allowed us to come in, and we 13 had their name and information because we just 14 observed their plea. And so we sat down with them, 15 and in the rooms where they typically meet with 16 their attorneys, so it was a private setting, and 17 we asked them if they were willing to talk to us. 18 And we described what we were trying to accomplish 19 with the research, and we provided an informed 20 consent, which is standard process in research. 21 And for the people that were not 22 incarcerated in the county jail, we did exactly 23 what you said, and we -- after they pled guilty, 24 they would go into the hallway, and then we went up</p> | <p style="text-align: right;">Page 32</p> <p>1 doctor, do you feel that you learned things from 2 talking to these individuals that participated in 3 that study? 4 A. That's the goal, yes. 5 Q. Okay. And when you're interviewing the 6 persons that are in custody or not in custody, do 7 they fill out any types of forms or surveys? 8 Anything like that? 9 A. So these were interviews. So we were 10 asking them questions, and they were, for the most 11 part, standardized questions, parts of scales. But 12 it wasn't the person -- it's not like we gave the 13 person a piece of paper and said, fill this out. 14 We asked the questions of them, and then recorded 15 their answers. 16 Q. And, ultimately -- I know you said you 17 published -- is it paper or papers on this study 18 that we're talking about? 19 A. So, so far we've published two 20 studies -- two papers from the observational study, 21 the one where we systematically observed more than 22 800 plea hearings. We are now working on the 23 publication for the interview data, but we have not 24 published that yet. This is just one example of a</p> |

11 (Pages 29 to 32)

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 33 | Page 35 |
|--|--|
| <p>1 study that I've done with 30-year-olds.</p> <p>2 Q. Okay. And just -- can you just briefly</p> <p>3 describe the results of the study that two papers</p> <p>4 have been published on?</p> <p>5 A. Sure. One paper focused just on the</p> <p>6 criminal court data where we were looking at</p> <p>7 differences in plea hearings for people who pled</p> <p>8 guilty to at least one felony versus people who</p> <p>9 pled guilty to misdemeanor only charges. And this</p> <p>10 was in circuit court. So all of their original</p> <p>11 charges were felony level. And we found that the</p> <p>12 plea colloquy was significantly shorter with people</p> <p>13 who pled only to misdemeanor offenses, and because</p> <p>14 it was shorter, it went over -- the judge asked</p> <p>15 significantly fewer questions related to</p> <p>16 volunteerism, knowingness, intelligence, and other</p> <p>17 things that we coded for.</p> <p>18 Q. In that study, how many of the pleas of</p> <p>19 guilty were for narcotics felony cases?</p> <p>20 A. There were many, but I don't know the</p> <p>21 exact number to tell you.</p> <p>22 Q. In the study, how many of the crimes</p> <p>23 were ultimately pled out to a misdemeanor and not a</p> <p>24 felony?</p> | <p>1 yes. I'd say maybe 15 percent were women.</p> <p>2 MR. BAZAREK: Okay. Hey, can we take just</p> <p>3 a -- I want to take like a quick five-minute break,</p> <p>4 okay?</p> <p>5 THE WITNESS: Okay.</p> <p>6 MR. BAZAREK: Then we can come back.</p> <p>7 THE VIDEOGRAPHER: Going off the record at</p> <p>8 9:47 a.m.</p> <p>9 (WHEREUPON, a recess was had.)</p> <p>10 THE VIDEOGRAPHER: Back on the record at 9:55</p> <p>11 a.m.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. Dr. Redlich, when you're interviewing --</p> <p>14 strike that.</p> <p>15 When you're interviewing the subjects</p> <p>16 that have pled guilty, you're receiving information</p> <p>17 from them firsthand about why they pled guilty. Do</p> <p>18 I have that right?</p> <p>19 A. That's one of the -- one set of</p> <p>20 questions that we'll ask them, about their reasons</p> <p>21 why. But we ask them lots of questions over the</p> <p>22 course of an hour.</p> <p>23 Q. Do you do any type of cognitive</p> <p>24 assessments when you're talking to these</p> |
| <p style="text-align: center;">Page 34</p> <p>1 A. I think it was 12 percent misdemeanor</p> <p>2 only.</p> <p>3 Q. Okay. So the vast -- well, the majority</p> <p>4 was for felony cases -- felony cases that someone</p> <p>5 pled to, is that correct?</p> <p>6 A. So they all began -- they all started as</p> <p>7 felonies, and then the 88 percent had at least one</p> <p>8 felony. They could have had -- they could have</p> <p>9 pled to misdemeanor, but they pled to at least one</p> <p>10 felony.</p> <p>11 Q. And in terms of the study group of the</p> <p>12 individuals who pled, did it include both men and</p> <p>13 women?</p> <p>14 A. Yes.</p> <p>15 Q. What was the breakdown in terms of the</p> <p>16 males versus females? Do you know what that was?</p> <p>17 A. Not off the top of my head, but I could</p> <p>18 look if you want.</p> <p>19 Q. That's -- well, yeah, if it doesn't take</p> <p>20 too long, you can look. Or if you can ballpark it.</p> <p>21 I mean, would you say the vast majority were men</p> <p>22 who pled guilty to these felony crimes?</p> <p>23 A. Yeah, I would say the vast majority were</p> <p>24 men, as is common in the criminal legal system,</p> | <p style="text-align: center;">Page 36</p> <p>1 individuals?</p> <p>2 A. So in that specific study, we</p> <p>3 administered something called the digit span test.</p> <p>4 But, again, I do that for -- in a research capacity</p> <p>5 and not a clinical capacity.</p> <p>6 Q. And describe what it is that you use.</p> <p>7 What is this?</p> <p>8 A. So the digit span test is you ask the</p> <p>9 subject, the participant, to -- you give them a</p> <p>10 series of numbers, it increases, like, from two</p> <p>11 digits to, you know, maybe five digits, and you ask</p> <p>12 them to repeat it back to you. And so there's a</p> <p>13 forward portion, and then a backwards portion</p> <p>14 where, you know, you say, you know, two, seven,</p> <p>15 nine, six, three, and they have to repeat that</p> <p>16 backwards to you. So forwards and backwards.</p> <p>17 Q. Okay. Any other tests that you perform</p> <p>18 on these individuals that you interview?</p> <p>19 A. I mean, I developed a plea comprehension</p> <p>20 measure. In the past, I've administered measures</p> <p>21 of competent to stand trial, you know, using</p> <p>22 research instruments. But, no. Cognitive, I don't</p> <p>23 do intelligence tests, or, you know, things like</p> <p>24 that, no.</p> |

12 (Pages 33 to 36)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 37</p> <p>1 Q. But you do see the value in speaking 2 directly with individuals who have pled guilty in 3 order for you to gather information for your study, 4 correct?</p> <p>5 MS. KLEINHAUS: Objection to form, foundation, 6 incomplete hypothetical.</p> <p>7 You can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A. For research purposes. And I don't look 10 at individuals. I look at an aggregate, patterns 11 and trends.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. But you still talk to individuals, 14 right?</p> <p>15 A. Yes.</p> <p>16 Q. Did you talk to Ben Baker or Clarissa 17 Glenn about their arrests that were made on 18 December 11, 2005?</p> <p>19 A. No.</p> <p>20 Q. Why not?</p> <p>21 A. Because I'm not that type of 22 psychologist, and I don't -- I've never done that 23 in any of the cases that I've worked on since 2004.</p> <p>24 Q. Is it because the lawyers won't let you</p> | <p style="text-align: center;">Page 39</p> <p>1 Clarissa Glenn about their December 11, 2005 2 arrest, right?</p> <p>3 A. I find very little to be impossible. I 4 said I don't feel qualified, and, therefore, I 5 don't think it's appropriate. I've reviewed the 6 materials related to their case.</p> <p>7 Q. But you would agree nothing prevents you 8 from speaking with Ben Baker or Clarissa Glenn 9 about the circumstances of their December 11, 2005 10 arrests other than you feel that you're unqualified 11 to do so, is that correct?</p> <p>12 MS. KLEINHAUS: Objection to form. Asked and 13 answered.</p> <p>14 You can answer it again.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I've never pursued that, so I don't know 17 if it's impossible or not in the hypothetical 18 sense. I do not ask the attorneys to do that. I 19 don't know if Clarissa or Ben would be willing to 20 talk with me. It's just not something that I've 21 ever pursued.</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. So, today, if Ben Baker and Clarissa 24 Glenn said, hey, we'd really like to talk to</p> |
| <p style="text-align: center;">Page 38</p> <p>1 talk to their clients?</p> <p>2 MS. KLEINHAUS: Objection to form, foundation, 3 argumentative, and invades the Rule 26 protection.</p> <p>4 So I would direct you not to answer as 5 to any specific case. With that, you can answer.</p> <p>6 BY THE WITNESS:</p> <p>7 A. It's for the reason that I just stated, 8 that I'm not that type of psychologist. It's not 9 because the -- I've asked and the attorney said no.</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q. Does anything prevent you from speaking 12 with Ben Baker or Clarissa Glenn about the 13 circumstances of their December 11, 2005 arrests?</p> <p>14 MS. KLEINHAUS: Objection to form.</p> <p>15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I don't feel that I've been trained or 18 am qualified. So that would be preventing me to 19 speak to them directly. Rather, my -- I see my job 20 as educating the judge and the jury, if it comes to 21 that, about science of guilty pleas.</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. But would you agree it's not impossible 24 for you to request and speak with Ben Baker and</p> | <p style="text-align: center;">Page 40</p> <p>1 Dr. Redlich. She's given opinions in our case. I 2 think it would be a really good idea for her to -- 3 for us to talk to her. Would you take them up on 4 that offer?</p> <p>5 A. I don't know.</p> <p>6 MS. KLEINHAUS: Objection, calls for 7 speculation.</p> <p>8 Sorry. You can answer.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. Why? Why don't you know?</p> <p>11 A. Because I don't know if it's 12 appropriate. I don't think it's appropriate, as 13 I've said.</p> <p>14 Just so you know, my last name is 15 pronounced with a K sound, Redlich.</p> <p>16 Q. Redlich. Okay. Sorry. Thank you, 17 Doctor.</p> <p>18 A. It's okay.</p> <p>19 Q. Is that something you want to do, 20 though? Do you think it would inform on the 21 opinions you have in this case?</p> <p>22 MS. KLEINHAUS: Objection to form, asked and 23 answered.</p> <p>24 You can answer it again.</p> |

13 (Pages 37 to 40)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 41 | Page 43 |
|---|---|
| <p>1 BY THE WITNESS:</p> <p>2 A. I believe that I'm aware of how they</p> <p>3 feel by reading their depositions and all of the</p> <p>4 interrogatories and those things.</p> <p>5 BY MR. BAZAREK:</p> <p>6 Q. Can you answer the question that I</p> <p>7 asked?</p> <p>8 A. I believe that I did.</p> <p>9 MS. KLEINHAUS: Objection, argumentative.</p> <p>10 She's answered the question several times.</p> <p>11 MR. BAZAREK: Can you read back that question,</p> <p>12 please?</p> <p>13 (WHEREUPON, the record was read by</p> <p>14 the reporter.)</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. It's your testimony you've answered that</p> <p>17 question?</p> <p>18 MS. KLEINHAUS: Objection, argumentative.</p> <p>19 MR. BAZAREK: Read back the answer -- here,</p> <p>20 read the question, and then read the doctor's</p> <p>21 answer.</p> <p>22 (WHEREUPON, the record was read by</p> <p>23 the reporter.)</p> <p>24</p> | <p>1 A. Thousands? No.</p> <p>2 Q. Okay. Well, we know you spoke to at</p> <p>3 least in the study we were talking about in</p> <p>4 California -- in northern Virginia about 25</p> <p>5 individuals, right, who pled guilty?</p> <p>6 A. In Virginia. I lived in northern</p> <p>7 Virginia, but I didn't say where the study was,</p> <p>8 yes.</p> <p>9 Q. Okay. So tell me how many individuals</p> <p>10 in your career, when you're interviewing</p> <p>11 individuals that have pled guilty to a crime, have</p> <p>12 you spoken with ballpark only, Dr. Redlich?</p> <p>13 A. So to clarify what you want me to do,</p> <p>14 are you talking about the number that I have spoken</p> <p>15 to directly or the number of participants in the</p> <p>16 many, many studies that I have published?</p> <p>17 Q. No.</p> <p>18 A. Because I do not do all of the</p> <p>19 interviews myself.</p> <p>20 Q. No, you directly, Dr. Redlich. You.</p> <p>21 A. I'm going to take a minute and look at</p> <p>22 some of the studies that I've published and remind</p> <p>23 myself.</p> <p>24 Are we talking about actual defendants</p> |
| <p style="text-align: center;">Page 42</p> <p>1 BY MR. BAZAREK:</p> <p>2 Q. So, if I understand your answer, you</p> <p>3 think it's unnecessary to speak with Ben Baker and</p> <p>4 Clarissa Glenn about the circumstances of their</p> <p>5 arrest, is that correct?</p> <p>6 A. You asked me if it would inform my</p> <p>7 opinions.</p> <p>8 Q. Do you think it's necessary or not</p> <p>9 necessary to speak with Ben Baker and Clarissa</p> <p>10 Glenn about their case?</p> <p>11 MS. KLEINHAUS: Objection to form, incomplete</p> <p>12 hypothetical.</p> <p>13 You can answer.</p> <p>14 BY THE WITNESS:</p> <p>15 A. It's not a question that I've asked</p> <p>16 myself, whether it's necessary or not because</p> <p>17 it's -- I don't feel that I'm qualified and have</p> <p>18 the training to speak with them.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. You speak to people all the time, right?</p> <p>21 A. In a research setting.</p> <p>22 Q. You speak to people, what? Would you</p> <p>23 say thousands of times about pleas of guilty that</p> <p>24 they've given in court?</p> | <p style="text-align: center;">Page 44</p> <p>1 or any type of person that I've asked about pleas?</p> <p>2 Q. No, I'll be -- it will be more narrow</p> <p>3 than that.</p> <p>4 How many people has Dr. Redlich</p> <p>5 personally spoken with who have pled guilty to a</p> <p>6 crime?</p> <p>7 A. So not not guilty pleas?</p> <p>8 Q. Who have pled guilty to a crime.</p> <p>9 A. So an actual crime. So we're talking</p> <p>10 about actual defendants is what I was asking you.</p> <p>11 Q. Correct. Exactly right.</p> <p>12 A. Okay. I'm going to take a minute.</p> <p>13 This is a ballpark, and I will also add</p> <p>14 that I do lots of different types of research</p> <p>15 methodologies. Interviewing defendants or</p> <p>16 interviewing people who just pled guilty is just</p> <p>17 one of my many methods that I use. But I'm going</p> <p>18 to say 500.</p> <p>19 Q. So you certainly have experienced it in</p> <p>20 talking to people that have pled guilty to crimes,</p> <p>21 right?</p> <p>22 A. Using the standardized interview measure</p> <p>23 that has been approved by human subjects review</p> <p>24 boards, that is part of the research process.</p> |

14 (Pages 41 to 44)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 45</p> <p>1 Q. Right. And you could use those same 2 questions, interview techniques, with Ben Baker and 3 Clarissa Glenn, right?</p> <p>4 A. In theory. I just don't see the need 5 for that. So I do believe that it's not necessary.</p> <p>6 Q. Did you even, like, think about that or 7 consider wanting to talk to Ben Baker and Clarissa 8 Glenn about the circumstances of their December 11, 9 2005 arrests?</p> <p>10 A. As I've said, I never considered that. 11 I don't do that, and I've said that.</p> <p>12 Q. So when I'm asking you questions at this 13 deposition, is that the first time you've ever even 14 thought about if that is something that should be 15 done?</p> <p>16 A. You're not the first person to ask me 17 questions about it, no.</p> <p>18 Q. Okay. Do you think it is necessary to 19 talk to Ben Baker and Clarissa Glenn about their 20 plea of guilty to drug crimes during September 21 of 2006?</p> <p>22 MS. KLEINHAUS: I'm just going to object to 23 the form, and asked and answered.</p> <p>24 You can answer.</p> | <p style="text-align: center;">Page 47</p> <p>1 arrests on December 11, 2005? 2 MS. KLEINHAUS: Objection to form. 3 You can answer.</p> <p>4 BY THE WITNESS: 5 A. Their version is -- Ben and Clarissa's 6 version is that they were stopped by two police 7 officers -- two police cars, and that drugs were 8 planted on them; whereas, the police version of 9 events is that they discovered drugs in the car. I 10 believe it was 50 bags of heroin.</p> <p>11 BY MR. BAZAREK: 12 Q. And you understand that Ben Baker was a 13 drug dealer, correct? 14 MS. KLEINHAUS: Objection to form, foundation, 15 calls for speculation. 16 You can answer.</p> <p>17 BY THE WITNESS: 18 A. I'm not sure what you -- I don't know 19 what characterizes somebody as a drug dealer. If 20 it means that they have dealt drugs in the past, I 21 believe that Ben admitted to that.</p> <p>22 BY MR. BAZAREK: 23 Q. Have you ever reviewed Ben Baker's 24 arrest history? It's also known as a rap sheet.</p> |
| <p style="text-align: center;">Page 46</p> <p>1 BY THE WITNESS: 2 A. I do not think it's necessary.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. Would you agree, other than you don't 5 think it's necessary, that nothing prevents you 6 from speaking with Ben Baker and Clarissa Glenn 7 about their pleas of guilty to drug crimes during 8 September of 2006?</p> <p>9 MS. KLEINHAUS: Same objections to form, and 10 also asked and answered.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I don't know if there's anything 13 preventing me because I never pursued it. I don't 14 know if the attorneys would not let me. I don't 15 know if Ben or Clarissa would refuse to talk to me. 16 I don't know because it's never come up.</p> <p>17 BY MR. BAZAREK:</p> <p>18 Q. And you've made no inquiry of any sort 19 to see if they would even want to talk to you, 20 right?</p> <p>21 A. That's correct.</p> <p>22 Q. Tell me, if -- strike that.</p> <p>23 What's your understanding of the 24 circumstances of Ben Baker and Clarissa Glenn's</p> | <p style="text-align: center;">Page 48</p> <p>1 A. Is it in my Appendix A? I don't believe 2 I did.</p> <p>3 Q. So I want to make sure. Is it your 4 understanding that Ben Baker -- strike that.</p> <p>5 Is it your understanding that Ben Baker 6 is a self-admitted drug dealer?</p> <p>7 MS. KLEINHAUS: Objection to form, 8 argumentative, foundation, calls for speculation. 9 You can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't really recall the specifics. 12 What I can say is that Ben's criminal history is 13 not -- was not relevant to my analysis of the 14 documents that were given to me and his -- the 15 reasons why he and Clarissa took the plea.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. So is it your testimony that whether or 18 not Ben Baker is a drug dealer, it has no relevance 19 to your opinions in this case? Do I have that 20 right?</p> <p>21 A. Yes, you have it exactly right.</p> <p>22 Q. Okay. Would you agree that Clarissa 23 Glenn was aware that her husband, Ben Baker, was a 24 drug dealer?</p> |

15 (Pages 45 to 48)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 49 | Page 51 |
|--|---|
| <p>1 MS. KLEINHAUS: Objection to form, foundation, 2 calls for speculation. 3 You can answer. 4 BY THE WITNESS: 5 A. I'm not entirely sure what Clarissa knew 6 about her husband. 7 BY MR. BAZAREK: 8 Q. Is it your testimony that Clarissa 9 Glenn -- strike that. 10 Is it your understanding that Clarissa 11 Glenn did not know that her husband was a drug 12 dealer at Ida B. Wells? 13 MS. KLEINHAUS: Objection to form, foundation, 14 calls for speculation. 15 You can answer. 16 BY THE WITNESS: 17 A. I vaguely remember her being asked that 18 question, and I don't remember her response, in one 19 of the documents that I reviewed. 20 BY MR. BAZAREK: 21 Q. Well, you read Clarissa Glenn's 22 deposition, and you read Ben Baker's deposition, 23 right? 24 A. Yeah. That's what I'm saying. I did</p> | <p>1 if Ben Baker and Clarissa Glenn were in the car 2 together and there was heroin in that car, would 3 that change any of your opinions in this case? 4 A. I don't know. 5 MS. KLEINHAUS: Same objections. 6 THE WITNESS: Sorry. 7 MS. KLEINHAUS: Go ahead. 8 BY THE WITNESS: 9 A. I don't know if it would change my 10 opinion or not because I don't have the full -- you 11 know, is it their heroin? Is it somebody else's 12 heroin? What are they saying about it? I mean, I 13 would need to look at the information that I had, 14 and you're not giving me enough information. I 15 don't -- I don't like engaging in these 16 hypotheticals. I was asked to review the evidence 17 that I did -- that I listed in Appendix A, and 18 that's what I've done. 19 BY MR. BAZAREK: 20 Q. Well, I know you were asked to do things 21 that Ben Baker and Clarissa Glenn's attorneys told 22 you to do. But I have questions about this case, 23 and so I'm going to ask again. 24 And if Ben Baker and Clarissa Glenn were</p> |
| <p style="text-align: center;">Page 50</p> <p>1 not memorize either document. They were extremely 2 lengthy. But I remember -- I think I remember her 3 being asked that question, but I don't recall her 4 answer because it's not really relevant to my 5 analysis and the reason that I was asked to opine 6 on this case. 7 Q. Well, let me ask you this: If, in fact, 8 Ben Baker and Clarissa Glenn were driving in a car 9 together on December 11, 2005, and they had heroin 10 inside that automobile that they drove in, would 11 that change any of your opinions in this case? 12 MS. KLEINHAUS: Objection to form, incomplete 13 hypothetical. 14 You can answer. 15 BY THE WITNESS: 16 A. I use the totality of the circumstances 17 approach, and I looked at all of the different 18 factors. I don't -- I didn't make an analysis 19 based on this hypothetical that they did have 20 drugs. There's conflicting accounts of that -- 21 what was in the car and whether the two of them had 22 drugs or not. 23 BY MR. BAZAREK: 24 Q. Dr. Redlich, here's -- my question is,</p> | <p style="text-align: center;">Page 52</p> <p>1 inside that car, and there was heroin in the car -- 2 consider that fact as I've just expressed it to 3 you -- would that change any of your opinions in 4 this case? 5 MS. KLEINHAUS: Objection to form, asked and 6 answered. She says she doesn't know. 7 You can answer it again. 8 MR. BAZAREK: Will you quit the speaking 9 objections, Tess? Just make your objections. 10 Thanks. 11 Go ahead. Let's read the question back. 12 (WHEREUPON, the record was read by 13 the reporter.) 14 BY THE WITNESS: 15 A. And the answer to that question is I 16 don't know. 17 BY MR. BAZAREK: 18 Q. What more would you need to know? They 19 were in the car, and they have heroin. What else 20 do you need to know as to whether or not it would 21 change one of your -- any of your opinions? 22 A. The things that I just mentioned, that 23 is it their heroin? What do they have to say about 24 it? What are other circumstances that might be</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 53 | Page 55 |
|--|--|
| <p>1 involved in the case? I don't know. There's a lot 2 of other hypothetical information that I don't know 3 about, and I would need to have access and to make 4 an informed opinion. Right now I have no opinion 5 of that.</p> <p>6 Q. Okay. Ben Baker is a self-admitted drug 7 dealer. Do you understand that?</p> <p>8 MS. KLEINHAUS: Objection to form. 9 Argumentative.</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q. Do you know that?</p> <p>12 A. No.</p> <p>13 Q. You don't know that? Okay. And then 14 he's also a Gangster Disciple.</p> <p>15 Have you ever interviewed Gangster 16 Disciples in your cases?</p> <p>17 MS. KLEINHAUS: Objection to form, foundation, 18 calls for speculation.</p> <p>19 You can answer, if you know.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Is that a gang in the Chicago area?</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. Yes.</p> <p>24 A. Then no.</p> | <p>1 (WHEREUPON, the record was read by 2 the reporter.)</p> <p>3 BY THE WITNESS:</p> <p>4 A. So I believe that I answered your 5 question because we're talking about my opinions in 6 this case which go to the voluntariness and the 7 reliability of the guilty pleas. And I'm saying 8 that there are other factors in this case that I 9 spoke about very -- very in detail in my report 10 that led to my opinion. So I believe that I did 11 answer your question.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. You didn't answer the question at all. You're avoiding the question.</p> <p>14 MS. KLEINHAUS: Please stop with the 15 argumentative commentary. Please.</p> <p>16 MR. BAZAREK: Well, we have -- this is going 17 to be a long deposition. I can tell you that.</p> <p>18 MS. KLEINHAUS: That's fine. Take your time, 19 but there's no reason to scold the witness that she 20 didn't answer your question.</p> <p>21 MR. BAZAREK: I'm not scolding the witness. 22 I'm not going to scold the witness. I'm going to 23 ask the court reporter to read the question again.</p> |
| <p>1 Q. Okay. Do you know anything about 2 narcotics operations of the drug dealers at 3 Ida B. Wells during the 2000s?</p> <p>4 A. No.</p> <p>5 Q. So you persist in saying you can't 6 answer this question where I'm giving you a basic 7 hypothetical. So let's -- maybe I'll try and be a 8 little more descriptive for you. Okay, 9 Dr. Redlich?</p> <p>10 So let's say both Ben Baker and Clarissa 11 Glenn knew that they had heroin inside that car, 12 and, in fact, that they did have heroin inside that 13 car.</p> <p>14 Would that change any of your opinions 15 in this case?</p> <p>16 A. So my analysis was looking at the 17 voluntariness of the plea as well, and it would not 18 change -- I mean, there were other factors that 19 spoke to the voluntariness and the reliability of 20 the guilty pleas that have nothing to do with the 21 drugs.</p> <p>22 MR. BAZAREK: Can you read back the question 23 because it wasn't answered?</p> <p>24</p> | <p>1 Go ahead. Let's try a third time. See 2 if that works.</p> <p>3 THE WITNESS: Can I interrupt for a minute?</p> <p>4 MS. KLEINHAUS: Objection, this is harassing 5 to read the same question over and over again. 6 It's clear she believes she answered your question. 7 So perhaps you need to rephrase it or ask your next 8 question.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. Do you understand that question, 11 Dr. Redlich, or not?</p> <p>12 A. I was going to clarify what you mean by 13 my opinions because I believe that I am talking 14 about my opinions in this case. But I want to make 15 sure that you and I are on the same page about what 16 my opinions are.</p> <p>17 Q. What are your opinions in this case?</p> <p>18 A. You're asking me about my opinions. I'm 19 asking you. You're saying I'm not answering the 20 question.</p> <p>21 Q. What --</p> <p>22 A. I'm talking about my opinions. My 23 opinions are about the voluntariness and the 24 reliability of the guilty pleas from the two of</p> |

17 (Pages 53 to 56)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 57</p> <p>1 them, from Baker and Glenn.</p> <p>2 Q. Right. But you're making opinions about 3 what they did in the court proceeding where they 4 pled guilty, correct?</p> <p>5 A. Yes. That's what speaks to the 6 voluntariness of why they took the pleas. Did they 7 feel that it was voluntary, or were they coerced 8 into taking it, and were they reliable pleas.</p> <p>9 Q. So let's try it this way: If Ben Baker 10 and Clarissa Glenn were, in fact, guilty of 11 possessing heroin on that day, would that change 12 any of your opinions in this case?</p> <p>13 MS. KLEINHAUS: Objection to form, incomplete 14 hypothetical, calls for speculation.</p> <p>15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I would like my answer to be I don't 18 know because I don't have all of the information. 19 That is what I am uncomfortable answering my -- 20 your hypothetical.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. So if Ben -- let's go back to it. If 23 Ben Baker and Clarissa Glenn knowingly possessed 24 heroin inside the vehicle on December 11, 2005,</p> | <p style="text-align: center;">Page 59</p> <p>1 recovered the narcotics from the car, would that 2 change any of your opinions in this case?</p> <p>3 MS. KLEINHAUS: Objection to form. 4 You can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I think that you just asked me the same 7 exact question. You were asking me to assume that 8 they're guilty. You're asking me to assume that 9 Detective Jones -- is it detective? I'm not sure. 10 Found the drugs.</p> <p>11 BY MR. BAZAREK:</p> <p>12 Q. Right.</p> <p>13 A. So my answer is the same. It may change 14 my opinion. I'm not sure.</p> <p>15 Q. And so what would it -- what would it -- 16 what other further information would you need to 17 know?</p> <p>18 MS. KLEINHAUS: Objection, asked and answered. 19 You can answer again.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I don't know because this is all purely 22 speculation and hypotheticals. I would need to 23 have the totality of the circumstances and all of 24 the full picture. I would need to hear a version</p> |
| <p style="text-align: center;">Page 58</p> <p>1 that would not change any of your opinions in this 2 case, is that correct?</p> <p>3 MS. KLEINHAUS: Objection to form, asked and 4 answered, calls for speculation, incomplete 5 hypothetical.</p> <p>6 Go ahead.</p> <p>7 BY THE WITNESS:</p> <p>8 A. There is a possibility that it would 9 change, but I don't know because I don't feel that 10 I have all of the information. But there is a 11 possibility.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. Okay. And why is there a possibility 14 that your opinions would change?</p> <p>15 A. Because that might speak to the 16 reliability of the guilty pleas. Not the 17 voluntariness, but the reliability. It could 18 influence it. It may not. I don't know because 19 this is all a hypothetical, and I don't have all of 20 the information that I feel that I need to answer 21 your question fully.</p> <p>22 Q. Well, if Alvin Jones's account of the 23 arrest of Ben Baker was truthful, and the arrest of 24 Clarissa Glenn, if that was truthful, and he</p> | <p style="text-align: center;">Page 60</p> <p>1 of events from the two defendants. I would need 2 other information.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. Well, you've read the deposition 5 transcripts of the police officers, right?</p> <p>6 According to the appendix that I read, these are 7 all things you reviewed.</p> <p>8 A. Yes, but that doesn't, you know, affect 9 your hypothetical.</p> <p>10 Q. I mean, I don't think I'm asking a 11 complicated hypothetical. I'm just asking you to 12 answer whether or not -- if, in fact, Ben Baker and 13 Clarissa Glenn possessed heroin in the car, whether 14 it would change any of your opinions.</p> <p>15 A. And I conceded that it may change my 16 opinion. I'm not sure what you want me to say. 17 You just want me to say that it would change my 18 opinion, and I'm not comfortable saying that.</p> <p>19 Q. And tell me why you're not comfortable 20 in saying that. You need more information? Is 21 that what it is?</p> <p>22 A. Yes.</p> <p>23 Q. Do you think you had enough information 24 to render the opinions that you had in this case,</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 61 | Page 63 |
|--|--|
| <p>1 or do you think you need some more information?</p> <p>2 A. I think the ultimate issue is a matter 3 for the jury, and I didn't offer an opinion that 4 they are factually guilty -- I'm sorry, factually 5 innocent. My opinion is that these -- the risk 6 factors that are present in this case are 7 consistent with other involuntary and false guilty 8 plea cases.</p> <p>9 Q. My question is, do you think you need 10 more information to give opinions in this case, or 11 you had just enough by what the plaintiffs' 12 attorneys gave you to review?</p> <p>13 A. I feel comfortable with --</p> <p>14 MS. KLEINHAUS: Objection, argumentative.</p> <p>15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I feel comfortable with the opinions 18 that I've issued.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. No. I'm asking about the materials that 21 you reviewed. Do you have sufficient materials to 22 render opinions in this case?</p> <p>23 A. Yes. That was my way of saying that I 24 believe that I had sufficient information to make</p> | <p>1 Q. And his name was Matthew Mahoney?</p> <p>2 A. Yes. I mean, it says -- I'm looking at 3 it. It says appeared for the defendant without 4 plural, but I assume -- was he for both?</p> <p>5 Q. It was Matthew Mahoney, right?</p> <p>6 A. Was he the attorney for both defendants?</p> <p>7 Q. I know you read the -- did you read the 8 transcript of the court proceeding?</p> <p>9 A. Yes. I'm looking at it right now, and 10 I'm saying it says, "Mr. Matthew Mahoney appeared 11 for the defendant," without the "s," even though it 12 was two defendants.</p> <p>13 Q. Right.</p> <p>14 A. Yeah.</p> <p>15 Q. But you know from reading the transcript 16 he represented both Mr. Baker and Clarissa Glenn, 17 right?</p> <p>18 A. I guess so. I'm not an attorney. Yeah.</p> <p>19 Q. Okay. All right. Did you make any 20 efforts to speak with Mr. Mahoney?</p> <p>21 A. No.</p> <p>22 Q. Why not?</p> <p>23 A. I had no questions for him.</p> <p>24 Q. Well, if you're offering opinions as to,</p> |
| <p>1 the opinions that I've made. I didn't offer any 2 firm opinions or the ultimate issue in this case. 3 That's the province of the jury.</p> <p>4 Q. Okay. And did you have -- just bear 5 with me.</p> <p>6 Do you have your report handy that you 7 prepared in this case -- let me take a step back.</p> <p>8 What did you do to prepare for this 9 deposition?</p> <p>10 THE WITNESS: I'd like to take a break.</p> <p>11 MR. BAZAREK: Yeah. How long would you like, 12 Doctor?</p> <p>13 THE WITNESS: Five minutes, please.</p> <p>14 MR. BAZAREK: Okay.</p> <p>15 THE VIDEOGRAPHER: Going off the record at 16 10:30 a.m.</p> <p>17 (WHEREUPON, a short recess was 18 taken.)</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. Dr. Redlich, when Ben Baker and Clarissa 21 Glenn pled guilty to the drug crimes during that 22 September of 2006 hearing, they were represented by 23 counsel, is that correct?</p> <p>24 A. I believe so.</p> | <p>1 you know, why his clients pled guilty, why wouldn't 2 you want to speak to the man himself who was 3 standing right next to them when they were in front 4 of Judge Toomin?</p> <p>5 MS. KLEINHAUS: Objection to form, 6 argumentative.</p> <p>7 You can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Because he would be answering 10 questions -- or giving an opinion about what he 11 thought his clients were thinking from -- based on 12 almost 20 years before, when I have the information 13 directly from Clarissa and Ben.</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. Well, you didn't speak to Clarissa and 16 Ben.</p> <p>17 A. No. I have the information from their 18 depositions and other things that I reviewed.</p> <p>19 Q. So you didn't think it was necessary to 20 speak to Mr. Mahoney. Do I have that right?</p> <p>21 A. Yes.</p> <p>22 Q. And I know from looking at your appendix 23 you didn't review his deposition, but were you 24 aware that he gave a deposition in this case?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 65</p> <p>1 A. No, I was not aware of that.</p> <p>2 Q. Do you think it would have been prudent 3 for you to review the deposition transcript of 4 Mr. Mahoney before you offered opinions in this 5 case?</p> <p>6 A. I don't know about prudent, but I would 7 have read it if it had been provided to me, and to 8 see if it was relevant or not. I don't know what 9 was in it. I don't know what Mr. Mahoney said, so 10 it's hard to answer that question without knowing 11 what was in it.</p> <p>12 Q. Well, you've already testified that the 13 materials that you've been provided by Mr. Baker 14 and Ms. Glenn are sufficient for you to formulate 15 your opinions, right?</p> <p>16 A. Yes. I'm saying that what I had was 17 sufficient. I did not say that every single thing 18 that I reviewed I found to be relevant. I don't 19 know if it's relevant until I review it.</p> <p>20 Q. So you don't know one way or another 21 whether or not it would be necessary for you to see 22 what Mr. Mahoney said under oath at deposition in 23 this case, is that correct?</p> <p>24 A. Necessary? No, I can't answer that</p> | <p style="text-align: center;">Page 67</p> <p>1 BY MR. BAZAREK:</p> <p>2 Q. Dr. Redlich, I'm not saying you're lazy 3 at all. I'm just wondering what efforts or lack of 4 efforts that you made in your review of this case. 5 That's all I'm asking about. But I'm not saying 6 you're lazy at all. I know you're not. I know 7 you're not lazy. I know you're very smart, highly 8 intelligent, and you've been -- it looks like 9 you've been at this for -- consulting on contested 10 confession cases for 20 years, right?</p> <p>11 A. Yes.</p> <p>12 Q. In all these contested confession cases 13 that you've worked on, have you ever actually spoke 14 to, you know, the individual who was bringing the 15 lawsuit?</p> <p>16 A. So, to be clear, I haven't worked on 17 that many. It has been a long time. It has been 18 20 years, but I don't really take on many cases. 19 And the answer to your question is no, that I've 20 never spoken to a person involved in these cases.</p> <p>21 Q. Okay. Tell me, when you review a case 22 such as this one with Ben Baker and Clarissa Glenn, 23 do you consider prior pleas of guilty that an 24 individual -- strike that.</p> |
| <p style="text-align: center;">Page 66</p> <p>1 question. I don't know what he said. I don't know 2 if he even has a memory of these two defendants 3 from 17 years before or --</p> <p>4 Q. Right.</p> <p>5 A. -- or 18 years before. I have no idea.</p> <p>6 Q. Right. And you made no efforts to find 7 out whether he knows something that might be 8 relevant to your review or not, right?</p> <p>9 MS. KLEINHAUS: Objection to form, 10 argumentative.</p> <p>11 You can answer.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I did not make any effort, no.</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. Right. And you made no effort to talk 16 to Ben Baker or Clarissa Glenn, right?</p> <p>17 MS. KLEINHAUS: Objection, asked and answered.</p> <p>18 You can answer again.</p> <p>19 BY THE WITNESS:</p> <p>20 A. If you're implying that I was lazy and I 21 didn't make an effort, I was very clear about why I 22 did not do that. I have very good reasons why I 23 chose not to do that, why it didn't even occur to 24 me. I don't do that in these types of cases.</p> | <p style="text-align: center;">Page 68</p> <p>1 Do you consider an individual's prior 2 history in terms of, like, pleading guilty to 3 crimes?</p> <p>4 A. Generally, I don't. If you're -- if 5 it's -- if you're asking me about whether I look at 6 the person's criminal history and whether they've 7 been convicted of crimes previously, I do not. I 8 don't feel that it -- I don't feel that it's 9 relevant to the case at hand.</p> <p>10 Q. So say, for instance, someone such as 11 Mr. Baker, where he had prior narcotics convictions 12 where he pled guilty, and that he pled guilty to an 13 attempted murder, and he pled guilty to other 14 crimes, that's not something that you feel you need 15 to evaluate when you offer opinions in this case?</p> <p>16 A. No, because, I mean, it's the same 17 reason that, with some exceptions, a person's 18 criminal history is not allowed at trial because 19 it's prejudicial and it doesn't feed into my 20 analysis of that specific case of why they're 21 saying that they chose to plead guilty on that 22 specific day, or if it was a reliable plea in that 23 specific case because every case stands alone.</p> <p>24 Q. So if I understand your testimony</p> |

20 (Pages 65 to 68)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 69</p> <p>1 correctly, say Ben Baker's actions -- I'm talking 2 pre-2006 where he pled guilty, you would not 3 consider and you don't think it has any relevance 4 to a case you may be -- strike that. Strike that 5 question.</p> <p>6 So in terms of the opinions that you're 7 offering in this case, and we know you're making 8 assessments, offering opinions about the pleas of 9 guilty from September of 2006, to you it doesn't 10 inform anything you're doing as to what Ben Baker 11 may have done on other pleas of guilty that he made 12 over the years for the numerous crimes that he 13 committed?</p> <p>14 MS. KLEINHAUS: Objection to form. 15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. Well, I will take issue with the crimes 18 that he committed because I don't know what crimes 19 he committed. I mean -- and I don't think I have 20 his rap sheet, so I don't even really have a good 21 sense of what crimes he was convicted of. 22 I do know that he has alleged that he 23 has been innocent of several of the ones that were 24 involved with Sergeant Watts and people surrounding</p> | <p style="text-align: center;">Page 71</p> <p>1 Q. In the records that you reviewed, did -- 2 strike that. 3 You reviewed certain medical records in 4 this case, is that right?</p> <p>5 A. Yes, just for Ben Baker. I don't think 6 I had anything for Clarissa.</p> <p>7 Q. So you were not provided with any 8 medical records for Clarissa Glenn, is that 9 correct?</p> <p>10 A. I can look if you'd like.</p> <p>11 Q. Well, we can -- on a break you can look, 12 but I don't see any that you did from what I saw in 13 your appendix.</p> <p>14 Okay. So in the medical records that 15 you reviewed for Mr. Baker, did you see that he 16 suffers from some type of cognitive impairment of 17 some sort?</p> <p>18 A. I don't recall that, no.</p> <p>19 Q. Okay. Or that he has some type of 20 learning disability? Anything like that?</p> <p>21 A. No. But what I will say is that my 22 opinion in this case is based more on situational 23 risk factors, three in particular: The package 24 plea deal, the utility of going to trial, and the</p> |
| <p style="text-align: center;">Page 70</p> <p>1 Sergeant Watts. 2 But I'm sorry, I lost your specific 3 question. Can you repeat it?</p> <p>4 MR. BAZAREK: Can you read it back, please? 5 (WHEREUPON, the record was read by 6 the reporter.)</p> <p>7 BY THE WITNESS:</p> <p>8 A. So in terms of his proclivity or not to 9 commit crimes, no. And I don't even think it 10 really speaks to his understanding of the plea and 11 what may happen because there's been significant 12 amounts of research that have demonstrated that, 13 you know, there's this assumption by the courts 14 that people's prior experiences in the court is 15 predictive of their later experiences in terms of 16 their understanding and appreciation, but studies 17 have bore out that there are really no correlations 18 there -- no significant correlations with that 19 information. So I don't put that much weight -- I 20 don't put any weight really on his prior 21 experiences.</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. Okay.</p> <p>24 A. To make my opinion in this case.</p> | <p style="text-align: center;">Page 72</p> <p>1 extreme plea discounts. So this is not a case 2 where I think there are dispositional risk factors 3 inherent to either Clarissa or Ben themselves that 4 would make their plea either involuntary or 5 unreliable.</p> <p>6 Q. Well -- and I know you only read Baker's 7 medical records. But I'm talking, you've read 8 their depositions, right? You've read Ben Baker's 9 medical records.</p> <p>10 My question to you is, do you see 11 anything in any of the records that you reviewed 12 that Ben Baker and Clarissa Glenn have some type of 13 cognitive impairment when someone is speaking to 14 them or talking to them?</p> <p>15 MS. KLEINHAUS: Objection to form. 16 You can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I would like to say that I was provided 19 with what I assume to be a portion of Mr. Baker's 20 medical records. I believe they were from the 21 prison. So I don't have access to his entire 22 medical history. I don't have access to 23 Ms. Glenn's medical history. 24 But as I've answered the question, I did</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: center;">Page 73</p> <p>1 not see anything about Mr. Baker or Ms. Glenn in 2 terms of cognitive impairments. But my opinions in 3 this case are not based on dispositional risk 4 factors, but situational risk factors. 5 BY MR. BAZAREK:</p> <p>6 Q. All right. And what do you mean by "dispositional risk factors"?</p> <p>7 A. So characteristics that are inherent to 8 the defendant, him or herself. So things like 9 cognitive impairment, mental health problems, young 10 age. Things that are part of -- part of that 11 person's disposition, as opposed to situational 12 things, things that are part of the situation risk 13 factors.</p> <p>14 Q. Okay. Okay. So let's talk about what are situational risk factors?</p> <p>15 A. In this case, I would -- what I believe 16 are the package plea deal that they -- the plea 17 deal was kind of contingent on both of them 18 accepting it, and the specifics of that package 19 plea deal, i.e., that Clarissa would get probation, 20 and that she could stay home to raise their three 21 children and not have somebody else parent their 22 school-aged children while she went to prison and</p> | <p style="text-align: center;">Page 75</p> <p>1 Q. Well, would you agree that a plea of 2 guilty to a crime, it should be knowingly, 3 intelligently, and voluntarily done?</p> <p>4 A. Yes. That is what the law requires.</p> <p>5 Q. Would you agree that Ben Baker and 6 Clarissa Glenn knew what they were pleading guilty 7 to?</p> <p>8 MS. KLEINHAUS: Objection to form. 9 You can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. That I cannot answer because what I do 12 believe, and what my research has shown for about 13 15 years now, is that the methods to assess whether 14 guilty pleas are knowing, intelligent, and 15 voluntary are not adequate.</p> <p>16 So Judge Toomin asking them questions, 17 do you understand that you're giving up these 18 rights, and then reading a litany of rights, or do 19 you understand that this needs to be voluntary, and 20 them answering yes, to me, that's not an indication 21 that they actually understood or not. They may 22 have understood. I don't know. But I cannot tell 23 based on the standard plea colloquy questions that 24 were asked of them.</p> |
| <p style="text-align: center;">Page 74</p> <p>1 he went to prison; the futility of going to trial; 2 and the extreme plea discounts. Those are the 3 three that I identified and discussed in this 4 report.</p> <p>5 I also talk about how -- the limited 6 amount of time that there may have been to discuss 7 the plea and make a decision about the plea for 8 both of them because they were supposed to -- my 9 understanding is that they were supposed to go to 10 jury that morning, that day, and they pled 11 guilty -- they ended up pleading guilty the same 12 day.</p> <p>13 Q. So are you faulting their counsel, Mahoney, that he should have taken more time to consider the deal?</p> <p>14 A. I'm not faulting anybody. I'm pointing 15 out that they likely had limited amount of time to 16 make this very important decision, which the 17 Supreme Court, as I mentioned in my report, has 18 called a grave and solemn act. So I'm not faulting 19 anybody. I understand that this is quite common in 20 pleas, that people don't have time to adequately 21 assess it. But that doesn't mean that it's a 22 sufficient amount of time.</p> | <p style="text-align: center;">Page 76</p> <p>1 Q. All right. You agree, though, that Ben Baker and Clarissa Glenn, they responded to Judge Toomin as he was speaking to them both, right?</p> <p>2 A. Responded? Yes.</p> <p>3 Q. Right. They -- Judge Toomin would ask them questions, and they would answer him, right?</p> <p>4 A. Yes.</p> <p>5 Q. Does that tell you that there was an understanding that they had because they were able to answer the judge's questions?</p> <p>6 A. No, that doesn't indicate understanding 7 to me. And, in fact, that's what my 15 years or so 8 of research has demonstrated. I don't know. Some 9 defendants do understand, some don't. I don't know 10 about these two specifically.</p> <p>11 Q. Do you think if you would have spoken with Ben and Clarissa Glenn directly and asked them, hey, did you understand what Judge Toomin said to you, do you think that would have been helpful for you in formulating your opinions in this case?</p> <p>12 A. No, because it's very similar to exactly 13 the questions that Judge Toomin asked. That's not 14 the kind of questions that I ask because -- I mean,</p> |

22 (Pages 73 to 76)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 77 | Page 79 |
|--|---|
| <p>1 I do ask those questions in my research studies 2 that we've discussed before, but then I assess 3 understanding, like, the plea comprehension measure 4 that I've developed and have used in several 5 studies now that demonstrates that for some 6 defendants, not all, a deeper questioning, and, you 7 know, do you -- questions that try to assess 8 comprehension rather than their self-report of do 9 you understand demonstrate that some defendants 10 actually don't understand, and some don't 11 understand that their plea needs to be voluntary 12 and what that means.</p> <p>13 Q. And are these questions that you ask -- 14 are these available?</p> <p>15 MS. KLEINHAUS: Objection to form.</p> <p>16 You can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I'm not sure what you mean by 19 "available."</p> <p>20 BY MR. BAZAREK:</p> <p>21 Q. Well, you just said, hey -- basically, 22 what I'm hearing what you're saying, the judge, you 23 know, they're asking short questions-type thing. 24 But you've crafted -- Dr. Redlich has these</p> | <p>1 endeavor -- it's not an endeavor. 2 Why don't you tell me -- just read the 3 questions. It sounds like you've done a lot of 4 work on this, and you've crafted these questions 5 that can really get to the bottom of things, right?</p> <p>6 MS. KLEINHAUS: I'm just going to object to 7 form. I mean, if you want her to go through and 8 read every question she's used in her research, I 9 think we're going to need to provide her some time 10 on the record to go, you know, find her materials. 11 We can -- I mean, I think it would be quite 12 lengthy, we can do that, but, I mean, she has to 13 have a chance to go get her script and read off it.</p> <p>14 MR. BAZAREK: Yeah. Maybe we can get the 15 script on a break.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. Can you tell me this, Dr. Redlich: How 18 many questions do you have in your questionnaire, 19 so to speak?</p> <p>20 A. So the plea comprehension measure 21 specifically, it's a series of true/false, I don't 22 know questions where the participant answers true, 23 false, or I don't know. And I think there's about 24 32 of them.</p> |
| <p style="text-align: center;">Page 78</p> <p>1 questions that can really get to the heart of the 2 matter and show if it was really knowing and 3 intelligent and voluntary, right? Isn't that what 4 you just said?</p> <p>5 A. That's what my research --</p> <p>6 MS. KLEINHAUS: I'm sorry. I just need to 7 object to the argumentative nature of the question.</p> <p>8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. Sorry. That's what my research -- part 11 of my research has been focused on for many years 12 now. And I'm happy to, you know, tell you which 13 publications that you can go look. The 14 publications are readily available, and they are 15 listed and discussed in my report.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. Okay. So does it actually have the 18 questions?</p> <p>19 A. It probably has example questions. I 20 wouldn't say it has all of the questions --</p> <p>21 Q. Okay.</p> <p>22 A. -- that I use in this measure.</p> <p>23 Q. Why don't you tell me -- why don't you 24 read to me the questions that you ask in this</p> | <p style="text-align: center;">Page 80</p> <p>1 And, again, I want to point out a few 2 things. One is what I'm saying is that some people 3 do demonstrate understanding. So I'm not really 4 sure of the purpose of this because I'm not 5 claiming that all defendants using my measure 6 demonstrate they don't understand. Right? But 7 what I am saying is that I don't know about Ben and 8 Clarissa.</p> <p>9 And I'm also not saying that I have the 10 definitive answer. This is a question that's 11 interested me, that I have spent significant time 12 on, that I've conducted many studies over in the 13 past 15 years that have come up with very 14 consistent answers, but I'm not claiming that -- 15 you seem to be insinuating that I have the 16 definitive answers, but that's not really what 17 science is all about and research. Research is 18 answering a lot of different questions, and I can't 19 prove things. Science doesn't prove things.</p> <p>20 Q. I'm not saying that you have the 21 definitive answers, but what I'm hearing you say, 22 Dr. Redlich, is you're basically saying what 23 happened with Ben and Clarissa Glenn in front of 24 Judge Toomin, it was not sufficient, right? Isn't</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 81</p> <p>1 that what you're saying? 2 A. Not sufficient for what purposes? 3 Q. It was not sufficient to know whether or 4 not it was a knowing and voluntary and intelligent 5 plea of guilty? 6 MS. KLEINHAUS: Just objection to form, that 7 it's compound. 8 You can answer. 9 BY THE WITNESS: 10 A. That is what my -- some of my research 11 has demonstrated with certain defendants. With 12 some defendants who just pled guilty. We have 13 other measures where we ask them to define words 14 that were -- that they were part of the plea 15 colloquy, like the word "plea" itself. And we find 16 things like about 25 percent of adults who just 17 pled guilty cannot adequately define the word 18 "plea." So I can get you a list of all the 19 vocabulary words that we ask them to define, but, 20 you know, you're welcome to read my publications, 21 and I can certainly identify the ones that I think 22 are relevant to this conversation. 23 Q. Yeah, I only want to talk about 24 relevant. But you said there was a plea</p> | <p style="text-align: center;">Page 83</p> <p>1 A. No. No, the interviewer who is asking 2 the questions records their verbal answers. But a 3 lot of the questions are standardized. 4 THE VIDEOGRAPHER: I'm sorry. I have to 5 interrupt. This is the videographer. My computers 6 just crashed. So if I could take us off the record 7 and get us back up. 8 MR. BAZAREK: Yeah. 9 THE VIDEOGRAPHER: Going off the record the 10 11:07 a.m. 11 (WHEREUPON, a discussion was had off 12 the record.) 13 THE VIDEOGRAPHER: Back on the record at 14 11:13 a.m. 15 BY MR. BAZAREK: 16 Q. Going back to -- strike that. 17 I know you said you don't find it 18 necessary to speak with Ben Baker and Clarissa 19 Glenn, but it sounds like, in terms of the 20 questions that you have crafted, it would take them 21 each about an hour to provide that information, is 22 that right? 23 A. It depends. I mean, I do want to point 24 out, though, that my studies, I make it a point to</p> |
| <p style="text-align: center;">Page 82</p> <p>1 comprehension -- 32 questions, true or false, 2 right? 3 A. Yes. 4 Q. What else do you have? 5 A. The plea vocabulary questions. 6 Q. How many questions are on the plea 7 vocabulary? 8 A. I think there's 15 or 16 words we ask 9 them to define. It depends on the specific sample 10 and that specific study. 11 Q. Yeah. 12 A. We have questions that go to 13 voluntariness, of perceived coercion measure. I 14 have -- like I said, these interviews take an hour 15 or more. 16 Q. Okay. To administer all the tests -- 17 strike that. 18 To administer all the questions, it 19 would take about an hour to fill them all out, is 20 that right? 21 A. To ask them verbally. They don't fill 22 them out. 23 Q. Okay. But they are committed to 24 writing, the questions that you ask, correct?</p> | <p style="text-align: center;">Page 84</p> <p>1 try and ask these questions very soon after the 2 plea. Not 17, 18 years later. I don't see the 3 utility in that. 4 Q. Well, is that because you think that -- 5 strike that. 6 So does that mean you discount 7 everything they say in a deposition? You don't 8 really care what they say because it's many years 9 later? 10 MS. KLEINHAUS: Objection to form, 11 mischaracterizes her testimony. 12 You can answer. 13 BY THE WITNESS: 14 A. I'm speaking specifically about the plea 15 comprehension and the ability to define the plea 16 vocabulary words. Not their own perceptions of 17 their case. So, you know, I don't know what 18 happened in the past 18 years in terms of, you 19 know, what they knew and understood then as opposed 20 to what they understand now. 21 And, again, I do want to reiterate that 22 this is not a case of dispositional risk factors, 23 that I'm opining that either one of them did not 24 understand words that were used in the plea</p> |

24 (Pages 81 to 84)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 85</p> <p>1 colloquy. I don't know. Okay? I just don't know. 2 I don't see any risk factors that they would or 3 wouldn't understand. What I'm rather seeing are 4 these situational risk factors that led to my 5 opinion in this case. So I'm not saying that they 6 did or didn't understand. I really have no idea. 7 BY MR. BAZAREK: Q. So why wouldn't you want to look at that part of it? 8 A. Why wouldn't I want to look at what? Q. The dispositional. Why wouldn't you want to look at that? 9 A. I did want to look at that, and I did look at it. There -- just I didn't see any risk factors. Q. Okay. So then you do agree that Mr. Baker and Ms. Glenn, from everything that you can see, they were -- they comprehended their pleas of guilty, right? They understood what they were doing? 10 MS. KLEINHAUS: Objection to form, calls for speculation. 11 You can answer.</p> | <p style="text-align: center;">Page 87</p> <p>1 people being undereducated, and I don't know if 2 that was the case, but neither one of them finished 3 high school except for with the GED. Q. What's a true guilty plea? 4 MS. KLEINHAUS: Objection to form. 5 You can answer. BY THE WITNESS: 6 A. A true guilty plea is a guilty plea in which the person is guilty -- factually guilty of the crime. 7 BY MR. BAZAREK: Q. So if Ben Baker had a true guilty plea before Judge Toomin in September of '06, would that change any of your opinions in this case? 8 A. If he had a true guilty plea? I mean, that's the issue at hand. That's -- I mean, I didn't say he definitively had a false guilty plea because that's the issue for the jury. 9 But I -- yeah, I mean, if there was some magic -- if you had the ability to magically say that this is a true and this is a false guilty plea, then I probably wouldn't say in the case of Ben, because right now we're just talking about Ben, that his case was consistent with other false</p> |
| <p style="text-align: center;">Page 86</p> <p>1 BY THE WITNESS: 2 A. So what I said is that I don't know if they understood or not. I'm not seeing any specific reasons why they didn't understand, but I have no idea if 18 years ago they understood or not. 3 BY MR. BAZAREK: Q. But you, in your review of this case, have found nothing to suggest that they didn't understand, correct? 4 A. You know, from the materials that were given to me, I didn't see any mental health problems from Mr. Baker from the medical records. I did see that both of them dropped out of high school, but I believe that Mr. Baker had gotten his GED by the time that he had pled guilty. I don't think that was the case for Ms. Glenn. I believe that she got her GED later than the plea. Although, you know, getting your GED and actually being in high school and finishing the classes is not exactly the same thing. I'm not an expert on that, but that's my opinion. And it's just one of the factors that could speak to whether or not they understood that. Sometimes I will talk about</p> | <p style="text-align: center;">Page 88</p> <p>1 guilty plea cases because somehow you have the objective information that it's a true guilty plea. 2 But that's a hypothetical. Q. Yeah, I'm not talking about magic. I'm just asking you to assume a fact. If Ben Baker, you know, gave a true guilty plea in September of 2006, would that change any of your opinions in this case? 3 MS. KLEINHAUS: Objection to form. 4 You can answer. BY THE WITNESS: 5 A. I believe that I just answered that question. That that's the whole issue in the case. So if -- but there's no way -- I mean, it just comes -- this is what the jury is going to have to do, or the judge, or whomever is weighing the facts of this case because there's no way to say this is absolutely true and this is absolutely false. 6 BY MR. BAZAREK: Q. I'm asking you to presume -- 7 A. So that's the magic I'm saying. Q. Okay. What I'm asking you to do, if, in fact, it was a true guilty plea of Ben Baker in September of 2006, does that change any of your</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 89</p> <p>1 opinions? 2 A. And I said that it would. And I don't 3 think I would even be here if we had that 4 hypothetical. The whole reason I'm here is to give 5 an opinion about the likelihood of this being a 6 true or false guilty plea. I'm not saying it's 7 true or false, but that's the whole reason I'm 8 here.</p> <p>9 Q. Right, but -- 10 A. It's what the jury has -- what they have 11 to decide.</p> <p>12 Q. Right. But I just heard you say that it 13 would change your opinion if it was a true guilty 14 plea, right?</p> <p>15 A. If there was some magic way of saying 16 that this is objectively a true guilty plea, which 17 this is just a hypothetical. But, yes, my opinion 18 is that these are consistent with false guilty 19 pleas. And if you're telling me it's a true guilty 20 plea, then, no, it would no longer be consistent 21 with the false guilty plea cases because you're 22 telling me it's true.</p> <p>23 Q. Right. 24 A. Even though we don't know that for sure</p> | <p style="text-align: center;">Page 91</p> <p>1 Q. Are there hallmarks of a guilty plea? 2 A. A true guilty plea. Yes, and I've said 3 before that in some ways they overlap with the risk 4 factors of false guilty pleas because the key 5 factor -- the key differentiating factor is whether 6 the person is factually innocent or factually 7 guilty. But there's a lot of other factors that 8 would affect why a person, either guilty or 9 innocent, would plead guilty. And so it could be 10 things like the discount, the leniency that they 11 receive. It could be factors that they are -- 12 don't understand. Or it could be that they got a 13 package plea deal. It could be that, you know, 14 they don't perceive their chances of winning at 15 trial.</p> <p>16 Q. What are -- okay. What are the 17 hallmarks of a true guilty plea?</p> <p>18 MS. KLEINHAUS: Objection, asked and answered, 19 calls for speculation.</p> <p>20 You can answer again.</p> <p>21 BY THE WITNESS:</p> <p>22 A. They are the factors that I just listed.</p> <p>23 BY MR. BAZAREK:</p> <p>24 Q. Well, one of the hallmarks of a true</p> |
| <p style="text-align: center;">Page 90</p> <p>1 because this is just a hypothetical.</p> <p>2 Q. And if, in fact, Clarissa Glenn gave a 3 true guilty plea in September of '06, would that 4 change any of your opinions in this case?</p> <p>5 MS. KLEINHAUS: Objection to form.</p> <p>6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I have the same answer.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. And the answer is your opinions would 11 change, right?</p> <p>12 A. In the hypothetical as you've described 13 it with the -- you know, with -- obviating the 14 reason that I need to be here in the first place, 15 yes.</p> <p>16 Q. Okay. What are the hallmarks of a true 17 guilty plea?</p> <p>18 A. So that the person is guilty. That it 19 reduces the amount of -- I'm sorry. Are you asking 20 about the risk factors or the guilty plea itself?</p> <p>21 Q. Do you ever use that term in your work, 22 "hallmark"? You use that, right?</p> <p>23 A. Yes, in my report, yes. False guilty 24 pleas.</p> | <p style="text-align: center;">Page 92</p> <p>1 guilty plea is that someone's guilty, right?</p> <p>2 A. Yes.</p> <p>3 Q. I mean, that was the first thing you 4 said. Then I heard you describing things. I 5 wasn't sure if you were talking about true guilty 6 pleas, or false guilty pleas, you were describing a 7 combo. So it was confusing to me.</p> <p>8 So that's why I'm going back to that 9 question. I heard you say that you're guilty. So 10 is that hallmark No. 1, that you're guilty, for a 11 true guilty plea?</p> <p>12 A. Yes. And I'm sorry that I confused you. 13 But what I was saying is that there's a lot of 14 overlap between true and false guilty pleas.</p> <p>15 Q. Right. Okay. So let's just focus on 16 true guilty pleas, okay? And we can talk about 17 overlap. We can talk about false guilty pleas. I 18 just want to focus on true guilty pleas, okay?</p> <p>19 A. Okay.</p> <p>20 Q. All right. So, number one, it's that 21 the person is guilty, right?</p> <p>22 A. Yes.</p> <p>23 Q. And what are the other, like, hallmarks 24 for a true guilty plea other than that the person</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 93</p> <p>1 is guilty?</p> <p>2 A. I just want to make sure I'm</p> <p>3 understanding your question. I think what you're</p> <p>4 asking me about is why would a guilty person plead</p> <p>5 guilty. Is that what you're asking me?</p> <p>6 Q. How do you define "hallmark" when you</p> <p>7 used the term in your report? What do you mean</p> <p>8 when you use the word "hallmark"?</p> <p>9 A. I think that's the way that I'm saying</p> <p>10 about the situational and dispositional risk</p> <p>11 factors. I think that's what you're asking me.</p> <p>12 What are the situational and dispositional risk</p> <p>13 factors that would lead a truly guilty person to</p> <p>14 plead guilty, and what are those same factors that</p> <p>15 would make an innocent person to plead guilty.</p> <p>16 Q. Okay. Yeah, let's go with that. Are</p> <p>17 hallmarks and risk factors -- does that mean the</p> <p>18 same thing?</p> <p>19 A. Not necessarily. I mean, I think I'm</p> <p>20 also talking about the study that I had done</p> <p>21 recently published in 2023 where we looked at -- we</p> <p>22 compared cases from the National Registry of</p> <p>23 Exonerations -- so these were people who were</p> <p>24 wrongly convicted and then officially exonerated,</p> | <p style="text-align: center;">Page 95</p> <p>1 What I was talking about is more on --</p> <p>2 Q. What are you reading right now as</p> <p>3 we're -- what are you looking at?</p> <p>4 A. My report. My report.</p> <p>5 Q. Your report from March 27, 2024,</p> <p>6 correct?</p> <p>7 A. Yes, yes.</p> <p>8 Q. Okay.</p> <p>9 A. So if you go to Page 3, so the</p> <p>10 paragraph -- the first full paragraph that begins</p> <p>11 with, "There are many reasons..." If you read the</p> <p>12 last few sentences of that paragraph, in a recent</p> <p>13 paper, my colleagues and I examined the factors</p> <p>14 that distinguished -- those sentences. The next</p> <p>15 sentence, and then the sentence after that.</p> <p>16 MR. BAZAREK: Okay. So let's just -- we're</p> <p>17 going to mark the Doctor's report. And I also know</p> <p>18 it contains her CV. It's 57 pages. We're going to</p> <p>19 mark that as Deposition Exhibit No. 1, so everyone</p> <p>20 knows.</p> <p>21 (WHEREUPON, a certain document was</p> <p>22 marked Exhibit No. 1, for</p> <p>23 identification, as of 4-25-24.)</p> |
| <p style="text-align: center;">Page 94</p> <p>1 and they were either wrongly convicted by plea, so</p> <p>2 false guilty pleas, or they were wrongly convicted</p> <p>3 at trial. And so we compared those.</p> <p>4 And so some of the hallmarks I'm</p> <p>5 describing are coming from that case -- from that</p> <p>6 study, excuse me, where we found, for example,</p> <p>7 that -- I think I talk about how drug cases, among</p> <p>8 the false guilty pleas, were five times more common</p> <p>9 than the wrongful convictions by trial, and we talk</p> <p>10 about -- I talk about the no crime type of wrongful</p> <p>11 conviction which is when a person is wrongly</p> <p>12 convicted but no crime actually occurred.</p> <p>13 Q. Okay. What you just testified to, is</p> <p>14 that -- there's a reference in your report of</p> <p>15 March 27, 2024, and on Page 2, there's a reference</p> <p>16 about 800 innocent plea takers have been</p> <p>17 exonerated.</p> <p>18 Is that what you're talking to --</p> <p>19 talking about, or something else?</p> <p>20 A. No, that's not what I'm talking about.</p> <p>21 That 800 figure is the figure of people who the</p> <p>22 National Registry of Exonerations has cataloged</p> <p>23 as -- in their data set -- or in their registry, I</p> <p>24 should say.</p> | <p style="text-align: center;">Page 96</p> <p>1 BY MR. BAZAREK:</p> <p>2 Q. All right. So I want to go back to --</p> <p>3 MS. KLEINHAUS: You want that showing, Bill?</p> <p>4 MR. BAZAREK: Yeah, just for -- you know, let</p> <p>5 me ask the doctor.</p> <p>6 BY MR. BAZAREK:</p> <p>7 Q. Doctor, are we looking at the first page</p> <p>8 of your report?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And then if I have this</p> <p>11 correctly, if we go to page --</p> <p>12 A. I will say that, you know, I can</p> <p>13 recognize this as my report. I can read certain</p> <p>14 words, but if you want me to look at that, I'm</p> <p>15 going to need it to be a lot bigger. But I have</p> <p>16 the report in front of me.</p> <p>17 Q. Yeah, you can review it in front of you.</p> <p>18 I just wanted to confirm the report that you</p> <p>19 drafted.</p> <p>20 Why don't we go to Page -- we'll go to</p> <p>21 Page 14 of that report. And that's your signature,</p> <p>22 right? You signed this report?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And it's 14 pages, right?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: center;">Page 97</p> <p>1 A. Yes.</p> <p>2 Q. And if we go to Page 13, you see there's</p> <p>3 a Section 4, it says, "Overall Summary." Do you</p> <p>4 see that?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And the Overall Summary, are</p> <p>7 these your opinions in Section 4, Overall Summary?</p> <p>8 A. That's a summary of my opinions, yes.</p> <p>9 Q. Okay. So let's go back to a true guilty</p> <p>10 plea. Other than the person's guilty, what are</p> <p>11 other hallmarks of a true guilty plea?</p> <p>12 A. So that they receive leniency for their</p> <p>13 crime. That the -- that the time is, you know,</p> <p>14 shorter; the prison time or jail time or whatever</p> <p>15 it may be, probation time. The factors that I</p> <p>16 listed before.</p> <p>17 I mean, I will say, like, the</p> <p>18 specific -- the false guilty plea hallmarks that I</p> <p>19 just talked about before, that was from that</p> <p>20 specific study.</p> <p>21 Q. I'm not talking about false guilty</p> <p>22 pleas. I'm talking about true guilty pleas.</p> <p>23 A. Yeah, well, I know, but I'm just saying</p> <p>24 that I did not do the same study with -- that</p> | <p style="text-align: center;">Page 99</p> <p>1 guilty pleas, I'm presuming that most people that</p> <p>2 I'm interviewing are truly guilty.</p> <p>3 Q. And that would include --</p> <p>4 A. That's what I'm saying.</p> <p>5 Q. Okay. Have you ever just done a study</p> <p>6 on true guilty pleas?</p> <p>7 A. So the studies that we were discussing</p> <p>8 before, the interview studies, that's what I'm</p> <p>9 saying. I'm saying that -- I presume that most</p> <p>10 people who plead guilty are guilty, but it's not</p> <p>11 like there's a registry of true guilty pleas that</p> <p>12 is similar to the study that I just -- the 2023</p> <p>13 study that I just described. That's all I'm</p> <p>14 saying.</p> <p>15 So when I interview people, like we</p> <p>16 talked about the interview, and the plea</p> <p>17 comprehension, I presume that most of them, if not</p> <p>18 all, are truly guilty, but I don't know that for</p> <p>19 sure because there's no magic that says you're</p> <p>20 truly guilty, you're falsely guilty. Although, you</p> <p>21 know, what I'm saying is that -- I'll rescind that</p> <p>22 a little bit because what I'm saying is that the</p> <p>23 National Registry of Exonerations gets close to</p> <p>24 having this objective measure of being a true</p> |
| <p style="text-align: center;">Page 98</p> <p>1 specific study with people who were truly guilty</p> <p>2 and people who were rightly convicted at trial. So</p> <p>3 when I'm talking about true guilty pleas, I'm just</p> <p>4 talking more generally. When I'm talking about the</p> <p>5 hallmarks of false guilty pleas, which is what I'm</p> <p>6 talking about in my report, I'm talking -- some of</p> <p>7 what I'm talking about are the situational and</p> <p>8 dispositional risk factors, and the information</p> <p>9 that I learned from that very specific study that</p> <p>10 only focused on people who were wrongly convicted</p> <p>11 and false guilty pleas.</p> <p>12 Q. So you've never done any studies on true</p> <p>13 guilty pleas, is that your testimony?</p> <p>14 A. No, that's not my testimony. What I'm</p> <p>15 saying is that I didn't do that specific study</p> <p>16 where I looked at people who were truly guilty and</p> <p>17 people who were rightly convicted at trial. I have</p> <p>18 done studies asking people who I presume to be</p> <p>19 truly guilty. But the false guilty plea study with</p> <p>20 the trials that I just described in the Redlich</p> <p>21 2023, these were cases that were in the National</p> <p>22 Registry of Exonerations and that had received this</p> <p>23 official exoneration status.</p> <p>24 So, you know, when we talk about true</p> | <p style="text-align: center;">Page 100</p> <p>1 wrongful conviction, either by plea or by trial,</p> <p>2 because they have very official criteria of</p> <p>3 exonerations.</p> <p>4 Q. And do you know any of the circumstances</p> <p>5 of the individual cases for the National Registry</p> <p>6 of Exonerations?</p> <p>7 A. Well, they provide summaries, and I'm</p> <p>8 familiar with many of the cases, but not all.</p> <p>9 There's over -- there's over 3,500 cases now. But</p> <p>10 I do know that they have very official set criteria</p> <p>11 that there has to be new evidence of innocence to</p> <p>12 officially exonerate the person.</p> <p>13 Q. When you're doing a study, you're</p> <p>14 looking at those groups of cases -- you're just</p> <p>15 looking at them as a whole, correct? You're not</p> <p>16 looking at them individually, right?</p> <p>17 A. Yes, that study that I just described,</p> <p>18 the 2023 one, yes, we're looking at the cases</p> <p>19 that -- we downloaded the data at that time. I</p> <p>20 think it was in, like, maybe 2020 or 2021. So it's</p> <p>21 not the same cases that you would see today</p> <p>22 because, you know, we just downloaded it at that</p> <p>23 time, and we looked at the cases that were wrongful</p> <p>24 convictions, exonerations by false guilty pleas</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 101</p> <p>1 versus wrongful convictions, exonerations by trial. 2 Q. So I want to make sure -- I want to go 3 back to my question about true guilty pleas. 4 Am I correct that you have never -- 5 strike. 6 You've already said you presumed the 7 people that you talked to, you know, most of them 8 are or all of them are guilty, right? That have 9 pled guilty, correct? 10 MS. KLEINHAUS: Objection to form, 11 mischaracterizes. 12 You can answer. 13 BY THE WITNESS: 14 A. Typically, in these studies, I have in 15 the past asked in an interview study about their 16 guilt or innocence. This was a -- the large scale 17 study that I published in 2010, I believe. But 18 that was over 1,000 people -- defendants with 19 mental health problems. That one was specific with 20 people with mental health problems. 21 Q. What was the name of that study from 22 2010? 23 A. I can get you the authors. It was, 24 like, Redlich -- I can't remember if the second --</p> | <p style="text-align: center;">Page 103</p> <p>1 MS. KLEINHAUS: Objection to form. 2 You can answer. 3 BY THE WITNESS: 4 A. That's what I'm trying to tell you. If 5 I'm understanding your question correctly. 6 BY MR. BAZAREK: 7 Q. Right. Do you ever ask that question? 8 A. So in the study with the offenders with 9 mental illness, we don't ask about the specific 10 crime of -- I'm sorry. Let me take a step back and 11 try to explain it. 12 So in that study with the -- the 2010 13 study with offenders with mental illness, we ask if 14 they ever falsely pled guilty or -- you know, did 15 they ever plead guilty to a crime they did not 16 commit. So we weren't talking about the reason why 17 they were -- were or were not in the legal system 18 at that point. 19 My other studies, where I'm not asking 20 that question, it is focused on the very specific 21 offense usually. About they just pled guilty, and 22 we're asking, you know, was it voluntary? Did 23 you enter -- you know, the plea comprehension 24 questions, the vocabulary questions. Things like</p> |
| <p style="text-align: center;">Page 102</p> <p>1 I think it was Redlich, Summers, Hoover, and 2 Hoover, I think. 3 Q. Did the study have a name? Was it 4 called something? That's all I'm asking, in 2010. 5 A. Yeah. Let me find it. All my studies 6 have titles. I just don't know what they are. 7 Self-Reported False Confessions and 8 False Guilty Pleas Among Offenders with Mental 9 Illness. So that one focused on people with mental 10 health problems. All of the sample had mental 11 health problems. 12 But, generally, in these studies that 13 I'm interviewing people who just pled guilty, I'm 14 not asking if they're guilty or innocent. 15 Q. So you never ask that question in your 16 studies, is that right? 17 A. Because the focus of those studies is 18 not about guilt or innocence. It's more about the 19 validity -- what I call the validity of guilty plea 20 decisions. So are they knowing, intelligent, and 21 voluntary. 22 Q. In any of the studies that you've done 23 when you're actually speaking to an individual, do 24 you ever ask that question, did you do it?</p> | <p style="text-align: center;">Page 104</p> <p>1 that. But I'm not asking them, the plea that you 2 just took yesterday, were you innocent of it? I 3 don't think I've ever asked that question, no. 4 Q. Okay. And have you ever asked this 5 question: Were you guilty of the crime that you 6 pled guilty to? 7 A. So with the study with the offenders 8 with mental illness -- 9 Q. Any study. Any study. I'm not limiting 10 it to the 2010. 11 A. That's the only study. I'm telling you, 12 that's the only study, is we asked them, did you 13 ever plead guilty to a crime that you did not 14 commit. That's the question. That was the 15 question. And we asked how many crimes -- how many 16 times have you pled guilty? So we were able -- so 17 let's say they said, I pled guilty ten times in the 18 past. Okay. Have you ever pled guilty to a crime 19 you didn't commit? Yes. How many times? Once. 20 So of the ten times, they falsely pled guilty once. 21 And we created measures around that. 22 Q. All right. So if I'm hearing you 23 correctly, you've never asked a direct question, 24 did you commit a crime?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 105 | Page 107 |
|---|--|
| <p>1 A. I believe that I did.</p> <p>2 Q. Like -- let me ask you this: Did you</p> <p>3 ever ask this question: When you pled guilty to</p> <p>4 that narcotics offense, were you guilty?</p> <p>5 MS. KLEINHAUS: Objection to form, asked and</p> <p>6 answered.</p> <p>7 You can answer it again.</p> <p>8 MR. BAZAREK: No, she hasn't.</p> <p>9 BY THE WITNESS:</p> <p>10 A. So we ask more generally. So I'm not</p> <p>11 asking about specific crimes, like the one that</p> <p>12 they, you know -- in that study, it was -- some</p> <p>13 people were in jail. Some people were not in jail.</p> <p>14 We weren't asking about their most recent offenses</p> <p>15 that they may or may not have even pled guilty to</p> <p>16 at that point. Okay? So I'm just asking</p> <p>17 generally. In the past, how many times have you</p> <p>18 pled guilty to a crime? Ten times. Of those --</p> <p>19 essentially, I'm asking next, of those times, how</p> <p>20 many times -- did you ever plead guilty to a crime</p> <p>21 you didn't commit. And if they say once or twice,</p> <p>22 then the answer is that they pled guilty -- truly</p> <p>23 guilty eight times.</p> <p>24</p> | <p>1 A. I don't know.</p> <p>2 Q. How many guilty pleas for drug crimes</p> <p>3 were made in the United States in 2006?</p> <p>4 A. I have no idea.</p> <p>5 Q. During 2006, in the courts of Cook</p> <p>6 County, how many pleas for drug crimes were made?</p> <p>7 A. I have no idea. But I will refer you to</p> <p>8 my report on Page 3 where I talk about all of the</p> <p>9 reasons why the number of known false guilty pleas</p> <p>10 is underestimated.</p> <p>11 Would you like me to talk about those</p> <p>12 reasons?</p> <p>13 Q. Have you ever observed any criminal</p> <p>14 court proceedings in Cook County?</p> <p>15 A. No, I don't believe I have.</p> <p>16 Q. When was the last time you actually</p> <p>17 observed a criminal court proceeding?</p> <p>18 A. COVID is the answer on that. But I'm</p> <p>19 going to say 2019 maybe when I was doing that study</p> <p>20 that we talked about before.</p> <p>21 Q. In Northern Virginia?</p> <p>22 A. In Virginia, yeah.</p> <p>23 Q. So that's -- tell me, during 2006,</p> <p>24 anywhere in the world did you observe any criminal</p> |
| <p style="text-align: center;">Page 106</p> <p>1 BY MR. BAZAREK:</p> <p>2 Q. Yeah. Okay. I understand what you're</p> <p>3 saying. But you don't ask a direct question of</p> <p>4 someone. For instance, oh, when you pled guilty to</p> <p>5 a drug crime, were you guilty of it? You don't ask</p> <p>6 that question, right?</p> <p>7 MS. KLEINHAUS: Objection to form, asked and</p> <p>8 answered.</p> <p>9 You can answer again.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I'm not asking about specific crimes.</p> <p>12 Like, of the drug crime or anything like that. I'm</p> <p>13 just saying of your past crimes -- I don't even</p> <p>14 know what they are, I don't know if they're drugs,</p> <p>15 or, you know, trespassing. I don't know what they</p> <p>16 are. I'm just -- like, these are very general</p> <p>17 questions to get at what we called event rates of</p> <p>18 false guilty pleas and, like, individual rates.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. During 2000 -- sorry. Were you done?</p> <p>21 A. Yes, I'm done.</p> <p>22 Q. Okay. During 2006, how many guilty</p> <p>23 pleas for felony offenses were taken in the state</p> <p>24 of Illinois?</p> | <p style="text-align: center;">Page 108</p> <p>1 court proceedings?</p> <p>2 A. Not to my recollection. It's possible.</p> <p>3 I really don't know. That was how many years ago?</p> <p>4 Eighteen years ago?</p> <p>5 Q. Yeah. As you sit at this deposition,</p> <p>6 what's the earliest time that you ever observed</p> <p>7 criminal court proceedings where individuals were</p> <p>8 pleading guilty to a crime?</p> <p>9 A. Are you asking me about plea hearings?</p> <p>10 Like, plea hearings?</p> <p>11 Q. Yes, yeah.</p> <p>12 A. You know, it's very possible in 2006 I</p> <p>13 was observing some criminal court hearings at</p> <p>14 least. Yeah, we were doing the study -- the 2010</p> <p>15 study -- that was published in 2010, we were in</p> <p>16 court probably, like, 2008 or so. I'm going to,</p> <p>17 you know, estimate. I don't know the very first</p> <p>18 time I ever saw a plea hearing.</p> <p>19 Q. Okay. And so you're guessing if you say</p> <p>20 it was in 2008?</p> <p>21 A. Yeah. I'm guessing, yeah.</p> <p>22 Q. Okay.</p> <p>23 A. For a plea hearing. Not all criminal</p> <p>24 court hearings, but yeah.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: right;">Page 109</p> <p>1 Q. Okay. And then do you ever watch plea 2 hearings on videotape?</p> <p>3 A. No.</p> <p>4 Q. So it's always in person for you?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And if I'm hearing you correctly, 7 you have observed no plea hearings since 2019, 8 correct?</p> <p>9 A. I think so. I'm not sure. We certainly 10 haven't gone back into the courtroom and collected 11 systematic observation data like we did before.</p> <p>12 Q. And when you say "we," are you referring 13 to colleagues of yours?</p> <p>14 A. No. These were my students. My 15 doctoral students.</p> <p>16 Q. Okay.</p> <p>17 A. And there was one -- there was one 18 colleague who -- she's at the -- a different 19 university in California.</p> <p>20 Q. Okay. And I didn't ask you this: Where 21 are you right now?</p> <p>22 A. You did. I was in Fairfax, Virginia.</p> <p>23 Q. Oh, I did ask.</p> <p>24 A. Yeah.</p> | <p style="text-align: right;">Page 111</p> <p>1 They're paid to be a graduate student and to work 2 on research and to meet their milestones and to get 3 their Ph.D.</p> <p>4 But this will a -- I will also say that 5 this study in particular that we're talking about 6 was funded by the National Science Foundation, and 7 it did fund a doctoral student, a graduate research 8 assistant.</p> <p>9 Q. And then when you were doing the 10 interviews in 2019, how many of the students were 11 part of your team?</p> <p>12 A. There was also what's called a 13 post-doctoral fellow. So this was someone who had 14 her Ph.D., and she came to work with me. So we had 15 about -- doing the interviews, there were about 16 three or four of us doing the interviews, yeah.</p> <p>17 Q. Okay.</p> <p>18 A. Including myself.</p> <p>19 Q. So I know from your report that you've 20 done some research on true and false guilty pleas, 21 right?</p> <p>22 A. Yes.</p> <p>23 Q. That's what it says on Page 2. Okay.</p> <p>24 A. Yeah.</p> |
| <p style="text-align: right;">Page 110</p> <p>1 Q. And then where -- you're at George 2 Mason? Do I have that right?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And then where you have the 5 students assisting you -- what's the name of the 6 class where you have these students helping you 7 out?</p> <p>8 A. It's not like that. It's not a class. 9 It's -- in graduate school, you mentor students -- 10 doctoral students. And so these are the students 11 who I mentor.</p> <p>12 Q. Okay.</p> <p>13 A. And who want to work with me, who -- I 14 mean, on that research team specifically, most were 15 doctoral students. There was one what's called a 16 postbaccalaureate student, someone who's finished 17 undergrad and is taking a little time off before 18 they go on to graduate school.</p> <p>19 Q. And are they paid for this or is it just 20 volunteer work they do?</p> <p>21 A. So they're paid as graduate students. 22 They have either a graduate research assistantship, 23 or a graduate teaching assistantship. And they're 24 not paid specifically to work on this study.</p> | <p style="text-align: right;">Page 112</p> <p>1 Q. And then you write, this is on Page 2, 2 "This research supports three fundamental positions 3 about guilty pleas in our criminal legal system 4 which are relevant to the case at hand." And then 5 Point No. 1, you say, "Not every defendant who 6 pleads guilty is factually guilty." Right?</p> <p>7 A. So I will point out that what I'm 8 describing in Section II is some of my research, 9 but it's also research that other people have done. 10 So this is just not -- you know, this is the 11 research, the science on guilty pleas.</p> <p>12 Q. Okay.</p> <p>13 A. Yeah.</p> <p>14 Q. And so what's -- can you just generally 15 describe what the research is for Point No. 1, "Not 16 every defendant who pleads guilty is factually 17 guilty"?</p> <p>18 A. So it's demonstrating that we know that 19 false guilty pleas exist, and that innocent 20 defendants will take guilty pleas, and the reasons 21 why the number of known false guilty pleas is very 22 likely to be an underestimation of the ones that we 23 currently know about, which is the ones in the 24 National Registry of Exonerations, which are, you</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 113</p> <p>1 know, just U.S. and just since 1989. 2 And I talk about the reasons why 3 people -- innocent defendants would plead guilty. Q. Okay. How many true guilty pleas occurred in the United States during 2006? 6 MS. KLEINHAUS: Objection, asked and answered. 7 You can answer again. BY THE WITNESS: 9 A. I don't know. But what I like to say is 10 if we had a method to say, at the outset, before 11 somebody pleads guilty, this is a true guilty plea 12 and this is a false guilty plea, then hopefully we 13 wouldn't have false guilty pleas, and hopefully the 14 judge would not allow an innocent person to plead 15 guilty. Or the defense attorney or something. But 16 that's an impossible question to answer, especially 17 before the person pleads guilty. BY MR. BAZAREK: Q. How many true guilty pleas were taken in Illinois during 2006? 21 MS. KLEINHAUS: Objection, asked and answered. 22 You can answer again. BY THE WITNESS: 24 A. I don't know. I don't even know the</p> | <p style="text-align: center;">Page 115</p> <p>1 one plea colloquy or one tender of plea form that's 2 going to include all of those elements. And I 3 usually, you know, look at different categories. 4 So it's elements that relate to voluntariness, to 5 knowingness, intelligence, to collateral 6 consequences, and then we usually have kind of like 7 an other category. And so within each of those 8 categories, you know, nowhere near the number of 9 things that could be asked or could be written down 10 are there. And that's one of the reasons why we're 11 saying it may not be sufficient. Q. Any other reasons? 13 A. I don't have it in my report, but 14 another systematic reason relates to discovery 15 rules around guilty pleas. I was trying to focus 16 on what was relevant -- like you mentioned in that 17 first paragraph, the opening paragraph of 18 Section II, relevant to the Baker Glenn case. Q. Okay. 20 A. And, obviously, discovery is relevant to 21 this case. Q. Okay. And then you also write, Point No. 3, "Not every defendant who pleads guilty makes voluntary decisions."</p> |
| <p style="text-align: center;">Page 114</p> <p>1 denominator of how many guilty pleas there were as 2 I've already mentioned. BY MR. BAZAREK: Q. Okay. Moving on. You also write that, "Not every defendant who pleads guilty has sufficient information to make an informed plea decision." What's your basis for saying that? A. Well, for one, I was talking about how there are some systematic reasons why defendants don't have full, complete information. For example, collateral consequences need not be made known to defendants. They may or may not. It's up to the defense attorney. But my understanding is that defense attorneys don't usually discuss those issues. And then I talk about some of my research where -- for example, where we observed court hearings, or I did a study where we analyzed written tender of plea forms which are optional, but they are kind of the written version of plea colloquies. And we talk -- I talk about how in both of those studies, all of the things that we're coding for, say, there are 40 elements, there's no</p> | <p style="text-align: center;">Page 116</p> <p>1 A. Yes. Q. What do you mean by that? A. So in this section, I describe the research that's been done about asking about voluntariness, the questions -- the ones I was saying before. But the court just simply asks, are you -- you know, are you making this decision voluntarily? You know, we found that 17 percent of the tender plea forms in the sample we examined didn't even mention voluntariness, which we found surprising since it's, you know, just such an important part of a ballot, any legal decision, is it voluntary. The first paragraph talks about how there's really no single clear definition of voluntary. And we give some examples, you know, from a federal case that talks about how if there was a pristine rule of no coercion, then many plea agreements would never go forward. Then we talk about some of the studies, the research that I had done where, you know, where people say that they pled -- that it was their choice, but when they're really -- and these are the questions that I was saying. This is exactly what the judge asked them. Did you plead guilty --</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: right;">Page 117</p> <p>1 you know, was it your choice to plead guilty, or 2 did anybody threaten you or make promises? And so 3 the fact that we got 93 percent, 96 percent of 4 people saying this is exactly what they just said 5 to the judge. So it's not surprising at all. But 6 when we asked them further questions, like, 7 44 percent did not know -- people who just pled 8 guilty, they didn't know that their plea had to be 9 voluntary. Or they said that a -- a third of them, 10 I think, said that someone other than the judge -- 11 I'm sorry. Someone other than themselves makes the 12 final plea decision after the court had agreed to 13 accept their plea.</p> <p>14 So those are the kinds of things I was 15 talking about before. We talk about why it can be 16 coercive -- this decision can be coercive, Hobson's 17 choice, and about the excessive plea discounts, and 18 the research that's been done on that, and how the 19 American Bar Association Task Force report which 20 recently came out last year talked about these plea 21 differentials, these discounts lead to coercion and 22 pleas.</p> <p>23 Q. Well, let me ask you this: For the 24 three fundamental positions that you referred to</p> | <p style="text-align: right;">Page 119</p> <p>1 Q. Okay. So when you were reviewing the 2 Ben Baker and Clarissa Glenn matter, did you 3 undertake a study as to whether or not it was a 4 true guilty plea that both of them took?</p> <p>5 A. Yes. That was the whole purpose in me 6 reviewing the materials. That was the analysis, I 7 think -- part of the analysis. I was also looking 8 at coercion.</p> <p>9 Can I ask, it's 1:00 o'clock my time.</p> <p>10 Are we going to be breaking for lunch?</p> <p>11 MR. BAZAREK: Yeah, sure. Of course. Of 12 course. What time would you like, Doctor?</p> <p>13 THE WITNESS: I don't know. What time is 14 typical? Like a half hour, is that sufficient?</p> <p>15 Forty-five minutes? An hour? What do people take 16 usually?</p> <p>17 MR. BAZAREK: We can do whatever -- see what 18 the other individuals -- I mean, I'm fine with 19 taking 45, but I don't know.</p> <p>20 THE WITNESS: Yeah, I mean, I don't know. My 21 feeling is I'd like -- I'm not sure how much more 22 you have, but, I'm thinking about the end time for 23 my day. So --</p> <p>24 MS. KLEINHAUS: Can we do a half hour instead</p> |
| <p style="text-align: right;">Page 118</p> <p>1 and that we just discussed, how are any of those 2 three applicable to the Ben Baker and Clarissa 3 Glenn matter?</p> <p>4 A. Well, that's exactly what I tried to do 5 in Section III. I take the research, and then I 6 apply it to the specifics of their case.</p> <p>7 So why innocent people may give false 8 guilty pleas. Why innocent people would plead 9 guilty. Why it could be not voluntary. And, you 10 know, I didn't talk about what we just -- what you 11 were just asking me about in Section II, but I also 12 talk about these package plea deals, and the 13 excessive plea discounts. All of those things are 14 relevant, which is why I said relevant, you know, 15 in the first part, Section II. They're relevant to 16 their case.</p> <p>17 Q. Well --</p> <p>18 A. Yeah.</p> <p>19 Q. But you would agree, guilty people plead 20 guilty to drug crimes, right?</p> <p>21 A. Guilty people plead guilty to drug 22 crimes, is that what you said?</p> <p>23 Q. Yes.</p> <p>24 A. Yes, I agree with that statement.</p> | <p style="text-align: right;">Page 120</p> <p>1 of 45 minutes?</p> <p>2 MR. BAZAREK: Say it again.</p> <p>3 MS. KLEINHAUS: Can we take a half hour 4 instead of 45 minutes?</p> <p>5 MR. BAZAREK: Yeah, fine with me. There's 6 many attorneys, so this dep could be going for a 7 while. So just so everyone knows.</p> <p>8 Why don't we come back at 12:35?</p> <p>9 MS. KLEINHAUS: Okay. Thank you.</p> <p>10 THE VIDEOGRAPHER: Going off the record at 11 12:04 p.m.</p> <p>12 (WHEREUPON, there was a recess for 13 lunch.)</p> <p>14 THE VIDEOGRAPHER: Okay. We're back on the 15 record at 12:37 p.m.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. Dr. Redlich, on any of the studies that 18 you've undertaken that involved individuals who 19 pled guilty to a crime, have any of those studies 20 been peer-reviewed?</p> <p>21 THE COURT REPORTER: I'm sorry. What was the 22 answer?</p> <p>23 BY THE WITNESS:</p> <p>24 A. All of them.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: center;">Page 121</p> <p>1 BY MR. BAZAREK:</p> <p>2 Q. And can you describe that process for 3 the peer review of your studies?</p> <p>4 A. Sure. I -- the social scientists and 5 other scientists, you submit the article to a 6 journal, and they send it out for peer review. 7 It's blind peer-reviewed, so the person -- the 8 three people -- it's usually three people, 9 sometimes more, that are reviewing the article 10 don't know who the authors are. They provide 11 comments. Typically, you respond to the comments 12 as opposed to it being accepted as-is. Sometimes 13 it gets rejected, but then it's -- you respond to 14 the comments, and the editor will then accept it or 15 reject it. And so the ones that I have published 16 were obviously accepted, and they've been 17 peer-reviewed. There's a couple exceptions, ones 18 that were in law reviews. I can think of one in 19 particular.</p> <p>20 Q. How many total studies on -- involving 21 pleas of guilty have you published that have been 22 peer-reviewed? Just a ballpark number.</p> <p>23 A. Like the empirical studies, the data 24 collection, as opposed to, like, overviews, and,</p> | <p style="text-align: center;">Page 123</p> <p>1 to let take some time. But if you scroll down to 2 2009, that's on Page 31. So I'm going to estimate 3 20 to 25, and one article in particular was a law 4 review and it was not peer-reviewed.</p> <p>5 Q. In your work -- strike that.</p> <p>6 How would you describe the work that 7 you're doing in this case in the matter of Ben 8 Baker and Clarissa Glenn? What are you in this 9 case?</p> <p>10 A. This is -- I would be serving as an 11 expert witness, and this is a legal consultation 12 case.</p> <p>13 Q. Okay. And then -- I know I asked you 14 earlier about cases where you've worked with the 15 Loevey & Loevey firm. So now I'm going to ask 16 questions that are not limited to the Loevey & Loevey 17 firm.</p> <p>18 So how many cases have you been retained 19 where -- as an expert for a civil or criminal 20 proceeding?</p> <p>21 A. For guilty pleas, or false confessions, 22 or confessions as well?</p> <p>23 Q. Let's break it down then. Let's do it 24 that way.</p> |
| <p style="text-align: center;">Page 122</p> <p>1 like, summaries of the research? Or, like, all of 2 my publications?</p> <p>3 Q. No. Thank you for clarifying that. One 4 where there's actually data, and you're actually 5 doing a full-blown study.</p> <p>6 A. Can I look at my CV?</p> <p>7 Q. Sure.</p> <p>8 A. Or you want me to just ballpark?</p> <p>9 Q. You can look at the CV.</p> <p>10 A. Okay.</p> <p>11 Q. And when you're looking at the CV, let 12 us know what page you're on because I know it's 13 part of your -- it's included within your report. 14 That is in Exhibit 1, right? Your CV is in there 15 as well?</p> <p>16 A. Yes. Well, it's going to be multiple 17 pages. Let me get that specific version of the CV.</p> <p>18 So if you look at Page 25 where it lists 19 my publications, and first I have books. And then 20 there are journal articles that start on Page 26. 21 And so from the current time, all the way to I 22 think 2009, I would say, is my first article that I 23 published on guilty pleas. But all -- I can't 24 really count. I mean, I can count, it's just going</p> | <p style="text-align: center;">Page 124</p> <p>1 A. These are estimates because I don't 2 really know. But for guilty pleas, I'm going to 3 say -- and these are just cases where I've been 4 paid. That's my distinction.</p> <p>5 For guilty pleas, I'm going to say 6 five -- six. Six. I'll go with six.</p> <p>7 Q. Okay.</p> <p>8 A. For confessions, I'm going to say 15 to 9 20. And sometimes I work on false -- you know, 10 alleged false confession, false guilty plea cases. 11 So both of them occur in the same case.</p> <p>12 Q. That's a combo?</p> <p>13 A. Yeah, like a combo, yeah.</p> <p>14 Q. And then what would the -- okay. You've 15 given the numbers, 15 to 20 on confessions, six on 16 the guilty pleas.</p> <p>17 What about the combo, false confession 18 and a guilty plea?</p> <p>19 A. Those would be included in those 20 numbers. They're not separate.</p> <p>21 Q. Okay.</p> <p>22 A. Yeah.</p> <p>23 Q. And what was your -- or strike that.</p> <p>24 These numbers that you just gave, you</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 125</p> <p>1 know, the six for the guilty pleas and the 15 to 2 20, what time frame are we talking about for that, 3 you being an expert witness?</p> <p>4 A. So the confessions go back to 2004, but 5 the guilty pleas probably started maybe in 2017 6 maybe.</p> <p>7 Q. And in the six cases where you've been 8 retained as an expert in guilty pleas, who are you 9 an expert for?</p> <p>10 A. Are you asking, like, the defense or the 11 plaintiff or something like that?</p> <p>12 Q. Right. Well, first of all, are they 13 civil cases? Are they criminal cases? Are they 14 both? What are they for those six?</p> <p>15 A. For the six? They're mostly civil for 16 guilty plea. I think that's partially by design. 17 There was one criminal one. And there was one that 18 was more of like a -- it was a conviction integrity 19 unit, and I wrote a report for them. So, like, a 20 formal case.</p> <p>21 Q. So for all the guilty plea cases where 22 you've been retained as an expert, you were 23 providing, you know, expert testimony and expert 24 report for an individual who had been charged with</p> | <p style="text-align: center;">Page 127</p> <p>1 retained as an expert for? 2 A. By the defense.</p> <p>3 Q. And on the false confession cases that 4 you were retained in the civil cases, who were you 5 an expert for?</p> <p>6 A. The plaintiff.</p> <p>7 Q. Okay. And the plaintiff that you were 8 an expert for was previously a criminal defendant 9 in a criminal case, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So have you ever testified on 12 behalf of a prosecuting office?</p> <p>13 A. In criminal cases, I've never been asked 14 by a prosecutor -- prosecuting office.</p> <p>15 Q. Okay. And so then you've -- okay. 16 So you've never testified on behalf of 17 prosecutors in any criminal court proceeding, 18 correct?</p> <p>19 A. I've never had the opportunity.</p> <p>20 Q. Have you ever testified on behalf of law 21 enforcement officers at any time?</p> <p>22 A. I don't understand the question.</p> <p>23 Q. Well, you've been hired as an expert for 24 defendants in criminal court proceedings, right?</p> |
| <p style="text-align: center;">Page 126</p> <p>1 a crime, is that right?</p> <p>2 MS. KLEINHAUS: Objection to form.</p> <p>3 You can answer.</p> <p>4 BY THE WITNESS:</p> <p>5 A. So for the guilty plea cases, yeah, 6 these were all cases that the person had already 7 pled guilty.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Okay. And so you were an expert on 10 behalf of an individual who had been charged with a 11 crime, right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And then for the false confession 14 cases, were those criminal proceedings or were they 15 civil proceedings?</p> <p>16 A. A mix of both.</p> <p>17 Q. Okay. And for the criminal proceedings 18 where you were retained as an expert, were you -- 19 who were you an expert for?</p> <p>20 A. I'm sorry. For the criminal or the 21 civil? I didn't --</p> <p>22 Q. Yeah, let me ask the question again. 23 On the cases where you were retained as 24 an expert on the criminal cases, who were you</p> | <p style="text-align: center;">Page 128</p> <p>1 A. You mean as -- sorry. I'll let you 2 finish. Go ahead.</p> <p>3 Q. Right. You've been retained to be an 4 expert for individuals that are defendants in a 5 criminal court proceeding, right?</p> <p>6 A. Yes.</p> <p>7 Q. And you've been retained as an expert 8 for plaintiffs that were previously defendants in 9 some type of criminal court proceeding, right?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So I'm asking you -- right, you 12 understand Ben Baker and Clarissa Glenn are suing 13 former and current law enforcement officers, right?</p> <p>14 A. Yes. So I'm asking law enforcement as 15 defendants in a civil case?</p> <p>16 Q. Yes, that's -- yeah, yeah. Have you 17 ever testified on behalf of law enforcement 18 officers that were defendants in a civil case?</p> <p>19 A. I don't think I ever had the 20 opportunity. Nobody's ever asked, really.</p> <p>21 Q. Do --</p> <p>22 A. Not that I recall. I mean, there might 23 have been one time that I had a conversation, but 24 it didn't sound like a case -- I turn down many,</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 129 | Page 131 |
|--|--|
| <p>1 many cases. So, you know, please understand. So I 2 think on the criminal side, no. On the civil side, 3 there was one instance I remember speaking with -- 4 I guess it's a prosecutor, I don't know, and they 5 were representing -- or I guess they were defense 6 attorneys representing law enforcement. I'm sorry. 7 And it didn't sound like a case I wanted to get 8 involved with. It didn't -- you know, there's many 9 reasons I'll turn down a case. I mean, the timing 10 is a huge one. So, you know, they say we need you 11 tomorrow. I say, no, thank you. And, you know, 12 it's -- I base my initial declinations on a lot of 13 different reasons.</p> <p>14 Q. How does someone know how to find you to 15 retain you for your services? Do you advertise?</p> <p>16 A. No, no, no.</p> <p>17 Q. Someone goes to the phone book? How do 18 they know? Word of mouth? How do they know to use 19 you as an expert or have you consider their case as 20 an expert?</p> <p>21 A. Well, I think largely it's because of 22 the research that I published. So they find the 23 research, and they can easily Google me, and then 24 they need me -- you know, they can email me or they</p> | <p>1 A. Oh, no. I didn't know anything about it 2 until I was contacted by somebody.</p> <p>3 Q. Who contacted you?</p> <p>4 THE WITNESS: Am I allowed to answer that, 5 Tess?</p> <p>6 MS. KLEINHAUS: I'm going to -- yeah. I guess 7 I'm going to direct you not to answer that because 8 it goes to your communications with attorneys.</p> <p>9 MR. BAZAREK: No, it doesn't. You're saying, 10 Ms. Kleinhaus, that if -- I'm not asking about 11 conversations, at least not for that question. So 12 you're telling me -- or, strike that. You're 13 instructing the witness not to answer, like, who 14 contacted her about this case?</p> <p>15 MS. KLEINHAUS: I mean, I guess -- okay. You 16 can say who contacted you. I mean, that's the 17 extent of, I guess, what you're allowed to testify 18 to. Go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. It was Josh Tepfer.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. Did you know Josh Tepfer before he 23 contacted you?</p> <p>24 A. Yes.</p> |
| <p style="text-align: center;">Page 130</p> <p>1 can call me, or sometimes I'll get referrals from 2 other people.</p> <p>3 Q. What percentage of your income in 2023 4 was for expert?</p> <p>5 A. I'm going to say 3 percent maybe.</p> <p>6 Q. Okay. And is that number the same over 7 the years? Has it picked up? Is there less work 8 you're getting for expert work?</p> <p>9 A. I could have lots and lots of work. I 10 turn down cases all the time. I don't enjoy this. 11 This is not how I want to spend my day. So I -- 12 sorry. No offense, but I don't take on many cases.</p> <p>13 Q. So what made you take this case on?</p> <p>14 MS. KLEINHAUS: I'm just going to object to 15 the extent it goes into any work product or 16 conversations with attorneys.</p> <p>17 But if you can answer it without that, 18 then go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. The case interested me.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. And when you say it interested you, were 23 you following the news? Or what -- how did it 24 interest you?</p> | <p style="text-align: center;">Page 132</p> <p>1 Q. How did you know him?</p> <p>2 A. Because of my work on false confessions 3 in juveniles.</p> <p>4 Q. Okay. So you've worked with Mr. Tepfer 5 in the past, and that has nothing to do with your 6 expert work in this case, is that right?</p> <p>7 MS. KLEINHAUS: Objection to form.</p> <p>8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I can't honestly -- I cannot recall a 11 case that I worked on with Josh. It's more that -- 12 I met Josh, I think he was a student at 13 Northwestern Law School with Steve Drizzen, and it 14 was more legal scholarship. I've seen Josh at 15 conferences. I remember being at one at Rutgers 16 University in 2009 that we both published a paper. 17 And so I've run into him in those circles, and 18 not -- I can't think of any cases that I've worked 19 on with Mr. Tepfer.</p> <p>20 BY MR. BAZAREK:</p> <p>21 Q. Is Mr. Tepfer a friend of yours?</p> <p>22 A. He's an acquaintance. I've known him 23 for many years, I guess.</p> <p>24 Q. Have you socialized with Mr. Tepfer?</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 133 | Page 135 |
|--|---|
| <p>1 A. At a conference? Like -- I mean, just 2 like what people do at a conference. Not outside 3 of a conference, no.</p> <p>4 Q. Okay. When you're at a conference, 5 maybe you shared a meal with him, had a few drinks? 6 That type of thing?</p> <p>7 A. Not even that. I would say, you know, 8 mostly it's just like conversation -- friendly 9 conversations that lasted ten minutes or so. But, 10 no.</p> <p>11 Q. Are you friends with Mr. Tepfer on 12 Facebook?</p> <p>13 A. Yes.</p> <p>14 Q. Yeah. And do you communicate with 15 Mr. Tepfer on Facebook?</p> <p>16 A. No, I don't post on Facebook.</p> <p>17 Q. Okay. But, you know, if he -- say, 18 Mr. Tepfer, has pictures of him with his kids, 19 or -- did you give a heart or a, you know, 20 thumbs-up-type thing where you respond to posts 21 that he may make on Facebook?</p> <p>22 A. I don't -- I don't really -- I kind of 23 lurk on Facebook. I don't really like anybody's 24 photos. It's nothing specific to him, but I don't</p> | <p>1 said, it was more like a meeting where many people 2 were sitting around a table. And, to be honest, I 3 can't tell you much more than that because it was 4 20 years ago.</p> <p>5 Q. Okay. When Mr. Tepfer contacted you 6 about this case, was it over the telephone or was 7 it via email? What was it?</p> <p>8 A. Telephone.</p> <p>9 Q. Did Mr. Tepfer provide -- at any time 10 did he ever provide you with data or other 11 information that you relied on in forming your 12 opinions in this case?</p> <p>13 MS. KLEINHAUS: Objection to form. Do you 14 mean other than what's in the appendix?</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. Yeah, I'm not -- yeah. I'm not talking 17 about -- I know you received documents, whether you 18 got them in an email or they came in the mail. I'm 19 talking about, like, factual data.</p> <p>20 I'll give you an example. Dr. Redlich, 21 Ben Baker and Clarissa Glenn, they were framed by 22 members of Ron Watts's tactical team. Did he ever 23 say anything like that to you, as an example?</p> <p>24 MS. KLEINHAUS: Just object to the form to the</p> |
| <p style="text-align: center;">Page 134</p> <p>1 really tend to do that. And he doesn't post that 2 much from what I'm scrolling through. So --</p> <p>3 Q. Are you Facebook friends with any other 4 attorneys at Loevy & Loevy besides Mr. Tepfer?</p> <p>5 A. No. Not to my knowledge, no.</p> <p>6 Q. And you said you met Mr. Tepfer you 7 think at Northwestern?</p> <p>8 A. Yes.</p> <p>9 Q. Yeah. Are you a mentor to him?</p> <p>10 A. No, no.</p> <p>11 Q. Okay. And then describe your 12 interactions with Mr. Tepfer at Northwestern.</p> <p>13 A. This was many, many years ago. This was 14 when he was a student, and this was when I was -- I 15 was pretty early in my career at the time.</p> <p>16 Q. And I'm sure it's somewhere on your CV. 17 What did you do at Northwestern?</p> <p>18 A. Oh, I just remember there was a 19 conference there that the -- I don't know if you 20 would call it a conference, but a meeting that the 21 Center For Wrongful Convictions had put on. This 22 was -- this was early 2000s, I would say.</p> <p>23 Q. Did you speak at the conference?</p> <p>24 A. It wasn't really a conference. As I</p> | <p style="text-align: center;">Page 136</p> <p>1 extent it goes beyond asking her if she was given 2 any facts or assumptions by any attorneys for 3 plaintiffs.</p> <p>4 With that caveat, you can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A. No, Josh did not do anything like that. 7 That sounds like it would be stepping outside of 8 his ethical bounds. And I've disclosed everything 9 in Appendix A, and he did share with me a podcast 10 that he had done that I put on Appendix A.</p> <p>11 BY MR. BAZAREK:</p> <p>12 Q. Okay. So it's your testimony then that 13 he never gave you any assumptions for you to have 14 in your review of this case, is that correct?</p> <p>15 A. No. I think he fully appreciates and 16 understands the parameters of an expert witness, 17 and he doesn't want to bias me in any way, and, you 18 know, that wouldn't serve his case.</p> <p>19 Q. Are you biased?</p> <p>20 A. I don't think so.</p> <p>21 Q. So let's look at Page 8 of your report. 22 And that's Section III, right? It says, "Ben 23 Baker's and Clarissa Glenn's Cases."</p> <p>24 A. Okay.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: center;">Page 137</p> <p>1 Q. So I'll just read that first sentence. 2 It says, "Ben Baker and Clarissa Glenn are two of 3 hundreds of individuals wrongly convicted as part 4 of the Watts scandal."</p> <p>5 Is that a neutral sentence, would you 6 say?</p> <p>7 MS. KLEINHAUS: Objection to form. 8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. From my understanding, it's an 11 objectively true statement. So I think it is a 12 neutral statement.</p> <p>13 BY MR. BAZAREK:</p> <p>14 Q. What's the source of your information 15 that Ben Baker and Clarissa Glenn were wrongfully 16 convicted?</p> <p>17 A. That their case was overturned, and they 18 got the Certificates of Innocence.</p> <p>19 Q. But you're not testifying that they're 20 innocent of anything in this case, correct?</p> <p>21 A. I'm -- I said wrongly convicted. You 22 can be wrongly convicted for lots of different 23 reasons, and all I know is that objectively they 24 received Certificates of Innocence. That's what</p> | <p style="text-align: center;">Page 139</p> <p>1 BY MR. BAZAREK: 2 Q. You have no idea as to whether or not 3 Ben and -- Ben Baker and Clarissa Glenn had heroin 4 inside their car on December 11, 2005, true?</p> <p>5 MS. KLEINHAUS: Objection to form. 6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. What I would say is that given the 9 materials that I've read and the conflicting 10 versions of Ben and Clarissa versus the law 11 enforcement officers' depositions -- their 12 depositions, the podcast that I listened to, I 13 would lean more towards crediting Ben and 14 Clarissa's accounts.</p> <p>15 And they also have other cases beyond 16 this -- or Mr. Baker does, not Ms. Glenn, that were 17 also overturned that I believe involved 18 Mr. Watts -- Sergeant Watts.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. So you're making credibility assessments 21 in your review of this case?</p> <p>22 MS. KLEINHAUS: Objection to form, 23 mischaracterizes her testimony.</p> |
| <p style="text-align: center;">Page 138</p> <p>1 they call them. So --</p> <p>2 Q. Do you know what the circumstances were 3 in terms of them receiving any Certificate of 4 Innocence?</p> <p>5 MS. KLEINHAUS: Objection to form. 6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I don't recall reading anything in the 9 materials I was given about that.</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q. Okay. But you're also writing they're 12 two of hundreds of individuals wrongfully 13 convicted.</p> <p>14 Are you providing an opinion in this 15 case that Ben Baker was wrongfully convicted, and 16 that Clarissa Glenn were wrongfully convicted?</p> <p>17 MS. KLEINHAUS: Objection, asked and answered. 18 You can answer it again.</p> <p>19 BY THE WITNESS:</p> <p>20 A. So my understanding is that their cases 21 were overturned. So I would label them as wrongly 22 convicted, and so would the court. I think the 23 court has said -- and I'm not saying -- there are 24 many reasons why somebody can be wrongly convicted.</p> | <p style="text-align: center;">Page 140</p> <p>1 BY MR. BAZAREK: 2 Q. Right?</p> <p>3 A. Credited, credibility, are they the same 4 word? I'm not sure.</p> <p>5 Q. Credibility assessment, have you ever 6 heard those two words said together?</p> <p>7 A. Sure. But what I would like for you to 8 tell me what you mean by them so that we are on the 9 same page.</p> <p>10 Q. I just heard you testify that your -- 11 you find -- I think this is what you're saying. 12 You find Ben Baker and Clarissa Glenn more 13 believable than the cops, right? Isn't that what 14 you're saying?</p> <p>15 A. I said I would lean more towards them.</p> <p>16 Q. Right.</p> <p>17 A. Yes.</p> <p>18 Q. So you're making credibility assessments 19 about who's telling the truth in this case, right?</p> <p>20 MS. KLEINHAUS: Objection to form, vague.</p> <p>21 BY THE WITNESS:</p> <p>22 A. That leads into my opinion -- my 23 summarized opinion that this case bears many of the 24 hallmarks of a false confession case -- I'm sorry,</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 141</p> <p>1 false guilty plea case. And so part of that 2 reasoning, and how I got to that expert opinion, is 3 that I am more crediting of their statements than 4 the police, yes.</p> <p>5 BY MR. BAZAREK:</p> <p>6 Q. Right.</p> <p>7 A. Based on the materials that I've 8 reviewed.</p> <p>9 Q. And I know you read Ben Baker's 10 deposition.</p> <p>11 Do you remember when I was asking him 12 questions about his interrogatory answers? Do you 13 remember that?</p> <p>14 A. No.</p> <p>15 Q. No? Are you aware that Ben Baker 16 falsified multiple interrogatory answers in this 17 proceeding that's in federal court? Are you aware 18 of that?</p> <p>19 MS. KLEINHAUS: Objection to form, foundation. 20 You can answer.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I don't know what you mean by 23 "falsified." Like, I don't know what you mean. I 24 don't know anything about that. So I would need</p> | <p style="text-align: center;">Page 143</p> <p>1 see that as lying. So if you're talking those 2 kinds of falsifications, no, it wouldn't change my 3 opinion. I just don't -- I don't know what you're 4 talking about.</p> <p>5 Q. Okay. Are you aware that Ben Baker was 6 charged federally for drug crimes? Are you aware 7 of that, or you never heard that? I'm the first 8 person telling you that?</p> <p>9 MS. KLEINHAUS: Objection to form. 10 Sorry. Go ahead.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Do you mean after his guilty plea in 13 2006?</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. After he got out of prison --</p> <p>16 A. Yes.</p> <p>17 Q. He got out of prison in 2016, right?</p> <p>18 A. Yes, I think so.</p> <p>19 Q. Are you aware that he was arrested by 20 federal authorities for narcotics trafficking, and 21 that he was selling drugs out of the house that he 22 shared with his wife and kids?</p> <p>23 A. Yes.</p> <p>24 MS. KLEINHAUS: Objection to form.</p> |
| <p style="text-align: center;">Page 142</p> <p>1 more information, but I'm not sure what you're 2 talking about.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. Well, you said you read his deposition.</p> <p>5 A. I did.</p> <p>6 Q. But you -- do you recall -- as you sit 7 here at this deposition do you recall any questions 8 asked of Ben Baker about his interrogatory answers? 9 Do you recall that?</p> <p>10 MS. KLEINHAUS: Objection, asked and answered. 11 You can answer again.</p> <p>12 BY THE WITNESS:</p> <p>13 A. No, I don't remember that.</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. If Ben Baker falsified multiple answers 16 in his interrogatories, would that change any of 17 your opinions in this case?</p> <p>18 A. I'm not sure what you mean by 19 "falsified."</p> <p>20 Q. Okay.</p> <p>21 A. I mean, it depends on what answers 22 and -- you know, like, sometimes people try to say 23 that people are lying in their plea hearings when 24 they say it was voluntary or something. I don't</p> | <p style="text-align: center;">Page 144</p> <p>1 Go ahead.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I'm sorry. I need to wait. I keep 4 forgetting.</p> <p>5 Yes, I do remember reading something 6 about that, but it doesn't really feed into my 7 analysis, as we've discussed before.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Okay. So if someone is a cunning liar 10 and they don't disclose information on 11 interrogatory answers, you're still going to kind 12 of believe what they have to say. Is that what 13 you're telling us?</p> <p>14 MS. KLEINHAUS: Objection to form, 15 argumentative, incomplete hypothetical, calls for 16 speculation.</p> <p>17 BY THE WITNESS:</p> <p>18 A. Yeah, I don't know anybody that -- I 19 don't know about Ben Baker being a cunning liar. 20 I'm not going to take that just because you say it. 21 I don't know what that means.</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. Okay. You don't know what a cunning 24 liar is?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 145 | Page 147 |
|--|---|
| <p>1 A. No. I do know what a cunning liar is. 2 I don't know that Ben Baker is a cunning liar 3 because you characterized him as such. 4 Q. Okay. 5 A. I don't know that. 6 Q. Do you think it's important to -- when 7 you take an oath to be truthful? 8 MS. KLEINHAUS: Just objection to the 9 extent -- I mean, it's argumentative and harassing 10 of the witness. 11 BY THE WITNESS: 12 A. So the question is do I think it's 13 important to be truthful during the taking of the 14 oath? 15 BY MR. BAZAREK: 16 Q. Yes. 17 A. Yes. 18 Q. Okay. In fact, I see your report, 19 you -- let's see. Page 13, "I declare under 20 penalty of perjury that the foregoing is true and 21 correct." 22 Those are your words, right? 23 A. Yes. 24 Q. Okay. And that's important. You took</p> | <p>1 A. I don't recall. 2 Q. I mean, did you, like, read it in the 3 paper? Did you do your own investigation to find 4 that out? 5 MS. KLEINHAUS: Objection, asked and answered. 6 You can answer again. 7 BY THE WITNESS: 8 A. If I did do that, I would have disclosed 9 it in Appendix A. 10 BY MR. BAZAREK: 11 Q. Well, okay. But there's no -- there's 12 no citation to Paragraph 1, correct? 13 A. Not every single sentence that I have in 14 my report has a citation. 15 Q. Right. I'm not asking -- 16 A. I'm sorry. I don't remember where I got 17 that information from. 18 Q. Okay. Did you get it from Josh Tepfer? 19 MS. KLEINHAUS: Objection to form, asked and 20 answered, harassing, argumentative. 21 You can answer again. 22 MR. BAZAREK: First off, Ms. Kleinhaus, that 23 has not been answered. 24</p> |
| <p style="text-align: center;">Page 146</p> <p>1 an oath under penalty of perjury that your report 2 was truthful, right? 3 A. I don't view it as important, but I know 4 my words are true. So I don't see it as important. 5 Q. All right. So let's go back to -- give 6 me a second. 7 In that first sentence, you referred to 8 the Watts scandal. What is the Watts scandal? 9 A. Oh, I'm sorry. We're back on Page -- 10 what page was that? Here, Page 8. 11 Q. Yeah. 12 A. The Watts -- it's the next sentence that 13 I wrote. Should I read it for you? 14 Q. So -- just so I'm clear, when you say 15 "the Watts scandal," you mean the next sentence? 16 Is that your understanding of what the Watts 17 scandal is? 18 A. The next three sentences -- the whole 19 paragraph. The rest of the paragraph, I would 20 say -- well, yeah. The next three sentences for 21 sure. 22 Q. What's the source of your information 23 for that first paragraph? Where are you getting 24 that from?</p> | <p style="text-align: center;">Page 148</p> <p>1 BY MR. BAZAREK: 2 Q. It was a simple question. Where do you 3 get the information from that you put in 4 Paragraph 1? 5 A. The answer is I don't remember. So I 6 did answer the question. 7 Q. Would anything help you remember? 8 A. No. But what I can say is that I would 9 never put this detailed information from something 10 that was verbally said to me on a phone call. 11 Q. Do you have access to the federal docket 12 that you can review cases online for information? 13 A. No. I wouldn't -- I mean, I might have 14 access, but I don't know how to do that, no. 15 Q. So I know you don't remember, but you 16 either -- either someone told you that, or you just 17 searched the Internet and you found some 18 information? 19 MS. KLEINHAUS: Objection, mischaracterizes 20 her testimony, asked and answered. 21 You can answer again. 22 BY THE WITNESS: 23 A. I don't remember, but I didn't search 24 the Internet.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: right;">Page 149</p> <p>1 BY MR. BAZAREK:</p> <p>2 Q. On Page 8, you write, "Mr. Baker's case</p> <p>3 is a complex one."</p> <p>4 Why is it complex?</p> <p>5 A. It involves multiple arrests and cases.</p> <p>6 Q. Does anything else make it complex?</p> <p>7 A. Not in particular.</p> <p>8 Q. On Page 9, I have a question. Well, let</p> <p>9 me -- let me take a step back.</p> <p>10 Why don't we just go to the section</p> <p>11 about the alleged event?</p> <p>12 A. Okay.</p> <p>13 Q. So why do you call it The Alleged Event?</p> <p>14 Why do you use that phrase, "the alleged event"?</p> <p>15 A. Because it's in dispute about what</p> <p>16 happened. There's two versions of it.</p> <p>17 Q. Okay. So at least for this section,</p> <p>18 you're not crediting one side over the other, is</p> <p>19 that right?</p> <p>20 A. Let me take a minute to read it.</p> <p>21 No, I think I'm being very descriptive</p> <p>22 here, or I'm just saying what they say and what the</p> <p>23 police officers say. Or just kind of the facts,</p> <p>24 that they were charged felony offenses.</p> | <p style="text-align: right;">Page 151</p> <p>1 paragraph, your recitation of the alleged events,</p> <p>2 where is what Officer Jones said occurred</p> <p>3 indicated?</p> <p>4 MS. KLEINHAUS: Objection that the report</p> <p>5 speaks for itself.</p> <p>6 Go ahead.</p> <p>7 BY THE WITNESS:</p> <p>8 A. That -- I talk about that later. And</p> <p>9 this was -- maybe that's why I call it the alleged</p> <p>10 event, in that this was the version of what Baker</p> <p>11 and Glenn are alleging to have happened.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. Okay. So this is what Baker and Glenn</p> <p>14 allege. There's nothing in here that reflects what</p> <p>15 Officers -- Officer Jones's account of what</p> <p>16 occurred, correct? Do you agree with that?</p> <p>17 A. In this specific paragraph? Yes.</p> <p>18 Q. Yes.</p> <p>19 A. In the whole report, no.</p> <p>20 Q. Yeah. In that specific paragraph where</p> <p>21 you describe, in your words, the alleged event?</p> <p>22 A. Yes.</p> <p>23 Q. The December 11, 2005. Okay. Right,</p> <p>24 because you remember -- I'm sure you remember this.</p> |
| <p style="text-align: right;">Page 150</p> <p>1 Q. So you write, "Sergeant Watts --" this</p> <p>2 is in the middle of the paragraph. "Sergeant Watts</p> <p>3 then falsely claimed that he found it on the</p> <p>4 driver's door of the car."</p> <p>5 Do you see that?</p> <p>6 A. So I'm quoting what Glenn said in her</p> <p>7 deposition. That's what she said.</p> <p>8 Q. Was it in her deposition or her</p> <p>9 affidavit?</p> <p>10 A. I'm sorry. Her affidavit, yeah.</p> <p>11 Q. Okay. And that's your understanding of</p> <p>12 what Glenn said in the affidavit? And you used</p> <p>13 that in formulating your opinions, correct?</p> <p>14 A. Among many, many other things, yes. I</p> <p>15 mean, that's just her version of events.</p> <p>16 Q. Is there anywhere in the alleged event</p> <p>17 where you provide what Officer Alvin Jones said</p> <p>18 occurred?</p> <p>19 A. I do. It might have been at the plea.</p> <p>20 I know I remember that I describe what the</p> <p>21 prosecutor would have proffered as evidence and</p> <p>22 what the police would have testified to at trial,</p> <p>23 which is their version of events.</p> <p>24 Q. What I'm asking you for, in this</p> | <p style="text-align: right;">Page 152</p> <p>1 Officer Jones, his account is Clarissa Glenn gave</p> <p>2 the bag of dope to Ben, right? Do you remember</p> <p>3 that?</p> <p>4 MS. KLEINHAUS: Objection to form.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I remember it specifically from the plea</p> <p>8 hearing.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. Okay.</p> <p>11 A. I don't remember specifically from his</p> <p>12 deposition.</p> <p>13 Q. Okay. Well, that's kind of a --</p> <p>14 wouldn't that be an important point to consider</p> <p>15 where -- the officers' account of what occurred?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So why don't you put in the</p> <p>18 alleged events the officers' account of what</p> <p>19 occurred?</p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 Go ahead.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Because I feel that I do that at other</p> <p>24 points, and that I was saying this is what Ben and</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 153 | Page 155 |
|--|--|
| <p>1 Clarissa are alleging happened. 2 BY MR. BAZAREK:</p> <p>Q. Okay. By the way, did you ever read any transcript from a court proceeding where Judge Toomin found that the officers' testimony was credible as it relates to Ben Baker?</p> <p>7 A. So in the plea hearing itself, he references -- Judge Toomin references those kinds of conversations and those decisions that he made, and that he was also going to not allow that testimony in if Ben and Clarissa went to trial. But I did not see the verbatim transcripts of the original decision by Judge Toomin, no.</p> <p>Q. All right. But you're aware that Ben Baker went to trial on another narcotics offense and he was found guilty, right?</p> <p>17 A. Yes. And I believe that case was overturned later.</p> <p>Q. You mean the conviction was vacated is what you mean?</p> <p>21 A. Yes.</p> <p>Q. Yeah. Okay. And I'm not going to take much time on it, but the section for The Guilty Pleas, this is your understanding of what occurred</p> | <p>1 they made it very clear that they both decided to 2 plead guilty because it would allow Clarissa to 3 stay at home -- to get probation and to stay at 4 home and to raise their children. 5 And then so -- you know, if it were -- 6 for example, a hypothetical, I don't know because 7 this didn't happen, but if Clarissa did not get 8 that deal, it's possible that Ben may have 9 proceeded to trial and take his chances. Although, 10 as I talk about in other parts of my report, I also 11 think that would be unlikely for other reasons. 12 But, clearly, you know, they wanted to protect -- 13 I'm quoting, "...to protect my wife and children 14 from the risk of my wife's imprisonment and upon 15 the agreement that she would only be sentenced to 16 one-year probation." But in order for her to get 17 that deal, Ben also had to plead guilty. And I 18 discussed why this would be a coercive situation 19 and quote some courts that also believe it to be a 20 coercive situation, and, you know, amicus brief 21 submitted by the American Psychological Association 22 in a Michigan Supreme Court case that also dealt 23 with the coerciveness -- possible coerciveness of a 24 package plea deal, and the research that -- why we</p> |
| <p style="text-align: center;">Page 154</p> <p>1 on September 18th, 2006? 2 A. Yes, more or less.</p> <p>3 Q. Okay. And then where are you getting that information from that you included in The Guilty Plea section? 6 A. I would say the plea hearing transcript.</p> <p>7 Q. Okay. Any other source for that information? 9 A. No.</p> <p>10 Q. Okay. I know you've talked -- I'm going to go now to the section, Risk Factors Leading to Baker-Glenn False Guilty Pleas. 13 And I remember earlier in the deposition you mentioned three things, and it was the package plea deal, right? That was number one. Futility of going to trial, and extreme plea discounts.</p> <p>17 And you have opinions about those three things as it relates to this case, correct? 19 A. Yes.</p> <p>20 Q. Okay. So what are your opinions about this package plea deal and how that helped lead to a false guilty plea for Ben Baker and Clarissa Glenn? 24 A. So as I quote both of them, you know,</p> | <p style="text-align: center;">Page 156</p> <p>1 as humans and evolutionarily have developed to 2 protect the people that we love.</p> <p>3 Q. Right. But you could also have a true guilty plea, and you were offered a package plea deal, right? 6 A. Yes, but that -- I'm talking about the coerciveness here.</p> <p>8 Q. Right. 9 A. I'm not talking about the reliability.</p> <p>10 Q. But you would agree that guilty people can have a true guilty plea where they receive a package deal, right? 13 A. So as I said earlier, there are -- is overlap between the factors that would lead a guilty person to plead guilty and that would lead an innocent person to plead guilty. This is a good example. 18 And here I'm talking about the coerciveness of the situation, and that why this package deal would lead an innocent person to plead guilty. Yes, it would lead a guilty person. But even -- it's so, so tempting and such a good deal, and they get to raise -- you know, Clarissa gets to raise her children, that it would lead an innocent</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 157 | Page 159 |
|---|---|
| <p>1 person to accept that deal rather than go to trial. 2 Q. Right. But also guilty people can 3 accept a package plea deal, right? 4 MS. KLEINHAUS: Objection, asked and answered. 5 She just answered that. 6 BY THE WITNESS: 7 A. Of course. But what I'm saying is that 8 in this situation -- not even in this situation. 9 The package plea deal would be even enticing to an 10 innocent person. 11 BY MR. BAZAREK: 12 Q. Right. Remember you talked about 13 overlap? I think you've said that numerous times, 14 overlap, right? Between true guilty pleas and 15 false guilty pleas, right, there's overlap? Right? 16 A. I just said that, yes. 17 Q. Okay. And so let's go to your next -- 18 the next point, the Futility of Going to Trial. 19 How does that factor into your analysis 20 and opinions in this case? 21 A. So one of the main reasons that people, 22 including innocent people, will accept a guilty 23 plea is because they perceive that they have no 24 chance of winning at trial. So earlier you just</p> | <p>1 and I don't think I'm making it very clearly 2 because I don't think you understand, is that 3 there's a baseline for guilty people. Okay? So 4 that they're going to be pleading guilty under 5 these circumstances. But even -- these 6 circumstances that I'm talking about would even 7 increase the likelihood of an innocent person 8 falsely pleading -- 9 Q. I know what you want to talk about. 10 What I'm asking you, and I do understand, guilty 11 people can understand the futility of going to 12 trial because they're guilty, right? 13 A. Yes. 14 Q. That's all I'm saying. Okay. 15 A. Not that it's a given. What I'm 16 saying -- the point I'm making in my report is that 17 these factors -- these situational factors increase 18 the likelihood of an innocent person falsely 19 pleading guilty because guilty people, in the 20 studies that I and others have done, very 21 consistently guilty people plead guilty more often 22 than innocent people. 23 Q. Ben Baker, he pled guilty -- 24 MS. KLEINHAUS: I'm sorry. Were you finished</p> |
| <p style="text-align: center;">Page 158</p> <p>1 mentioned that Ben Baker had gone to trial with 2 Judge Toomin and was convicted. Having that 3 experience would be very meaningful to him, and as 4 it's been shown in research to other defendants -- 5 other innocent defendants, why they would plead 6 guilty rather than taking their chances at trial. 7 Another factor here is that it's really 8 just the police version of events versus their 9 version of events. And for good reason, the police 10 are given more credibility than defendants 11 typically. Right? 12 I would also say that Judge Toomin 13 had -- was going to not admit the evidence -- or 14 not admit the -- I don't know if it's evidence, but 15 the information about the alleged actions of the -- 16 of Sergeant Watts and other detectives that Ben 17 could have used in his defense. But the judge 18 would not allow that in. So that was another 19 factor that would speak to the futility of going to 20 trial. And he knows that. 21 Q. And you would agree that guilty people 22 can also understand the futility of going to trial, 23 right? 24 A. I think the point I'm trying to make,</p> | <p style="text-align: center;">Page 160</p> <p>1 with your answer, Dr. Redlich? 2 THE WITNESS: No, I wasn't. 3 BY MR. BAZAREK: 4 Q. I apologize. I thought you were done. 5 A. That's okay. What I'm saying is that 6 these are the factors that lead to even innocent 7 people pleading guilty. So it's like a given that 8 they induce guilty people to plead guilty. 9 Q. Right. Because guilty people plead 10 guilty all the time, right? 11 A. I hope so. I hope that most people who 12 plead guilty are guilty; otherwise, our system is 13 extremely broken. 14 Q. And what about this extreme plea 15 discount? How does that factor into your opinion 16 in this case? 17 A. So this is an exercise where I 18 demonstrate that the plea discount for Mr. Baker 19 was 94 percent discount. So, you know, think of it 20 as if something cost \$100, you would be able to buy 21 it for \$4. And that for Ms. Baker -- Ms. Glenn, 22 her discount was essentially 100 percent because 23 she's not getting any time. She's just getting one 24 year of probation.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: right;">Page 161</p> <p>1 And then I go on to talk about, again, 2 as I referenced the research in Section II of my 3 report, that these excessive plea discounts have 4 been determined, described as being -- as coercive, 5 as leading innocent people, as well as guilty 6 people, to plead guilty. And this is something 7 that was discussed by the American Bar Association 8 plea bargaining task report that came out in 2023. 9 And these numbers, the way that I've 10 calculated it, are from -- directly from the judge 11 and what he's saying to Mr. Baker and Ms. Glenn at 12 their plea hearing and what they actually received 13 as part of the plea deal.</p> <p>14 Q. And guilty people can take extreme 15 discounts, too, right?</p> <p>16 A. Can they plead guilty under extreme 17 discounts? Yes.</p> <p>18 Q. Okay. So let's look at the -- going to 19 Section IV, this is your kind of wrap-up. You're 20 just summarizing what you have?</p> <p>21 A. Yes.</p> <p>22 Q. I'm sorry. You're giving an overall 23 summary of your opinions in this case, correct?</p> <p>24 A. Yes.</p> | <p style="text-align: right;">Page 163</p> <p>1 THE WITNESS: Thank you. 2 BY MR. BAZAREK: 3 Q. Take all the time you need. 4 A. So it's the package plea deal with 5 Ms. Glenn. That one. I mean, the fact that -- 6 it's elements within that as well that are specific 7 to this case, but that are common in other -- you 8 know, maybe slightly different forms, but in 9 similar enough forms. So the fact that -- so the 10 elements of the package plea deal, right? So 11 there's the fact that she's getting probation. 12 That she gets to stay home and raise their three 13 school-aged children. The fact that, you know, 14 he's getting -- they're both getting extreme 15 discounts of 90 percent -- 94 percent and 16 100 percent. The fact that Mr. Ben had already 17 been convicted at trial.</p> <p>18 Q. Now are we talking about Ben Baker now? 19 Did you do all the hallmarks for Clarissa Glenn?</p> <p>20 A. I'm kind of mixing them up. Some apply 21 to both, and some -- I mean, I think that one 22 applies to Ms. Baker -- I'm sorry, Ms. Glenn as 23 well because she observed her husband being 24 wrongfully convicted, and I do have a quote to</p> |
| <p style="text-align: right;">Page 162</p> <p>1 Q. Okay. So I want to make sure I 2 understand. I see that word hallmarks again. And 3 you write, this is on Page 13, "Mr. Baker's and 4 Ms. Glenn's guilty pleas bear many of the hallmarks 5 of a false guilty plea..." So let me stop there. 6 What specifically -- how many total 7 hallmarks are there? Let's start there.</p> <p>8 A. Well, I talk about the three situational 9 risk factors. I talk about them being -- false 10 guilty pleas being more common in drug cases and 11 the no crime type of wrongful convictions. I talk 12 about the -- well, I won't say that one. So 13 there's five.</p> <p>14 Q. There's five hallmarks? I want to make 15 sure I have them right.</p> <p>16 A. I don't know. I'd have to read my 17 report in detail again. But we can go with five.</p> <p>18 Q. Okay. Well, I mean, it's your report. 19 You wrote this, what, about a month ago? What are 20 the five -- why don't we just go through them one 21 through five? What are the five hallmarks? I want 22 to make sure I understand.</p> <p>23 MS. KLEINHAUS: Take as much time as you need, 24 Dr. Redlich.</p> | <p style="text-align: right;">Page 164</p> <p>1 that. I only -- this is Glenn, affidavit No. 18, 2 "I only pled guilty to this charge because Ben had 3 already been wrongfully convicted and sentenced to 4 14 years." So it doesn't necessarily have to be 5 that specific defendant. Of course, Ben knows 6 that, and Clarissa knows it, too, because she 7 observed it. And, you know, that's her husband. 8 So that's another factor.</p> <p>9 Another factor is that Mr. Baker says, 10 Judge Toomin told me that law enforcement testimony 11 was better than that of a pope. So it's their idea 12 of the futility of going to trial, and that it 13 would be their word against the police officers' 14 word. And he already knows that he was convicted 15 at the first trial. The judge denied the 16 evidence -- or the information coming in about the 17 allegations against Watts and his fellow officers.</p> <p>18 Q. Is your -- go ahead. Sorry.</p> <p>19 A. And then I was going to talk about the 20 extreme plea discounts. And then also that false 21 guilty pleas are more common among drug cases and 22 the no crime type of wrongful conviction.</p> <p>23 So I didn't count those. I don't know 24 how many there are, but there's more than five.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 165 | Page 167 |
|--|---|
| <p>1 Q. There's more than -- I want to make sure 2 I understand. Is -- when you use the word 3 "hallmarks" in your report, specifically in the 4 first paragraph of the overall summary, are 5 hallmarks different than your use of the word 6 factors in that same first sentence? Or do they 7 mean the same?</p> <p>8 A. In that sentence, I think they mean the 9 same. Well, I mean, I think I was talking about 10 risk factors. Hallmarks are a little bit 11 different.</p> <p>12 Q. Yeah. I'm just trying to -- I'm trying 13 to understand. I know you've gone through your 14 report. I appreciate that. I thought I had a 15 pretty straightforward question. I wanted you to, 16 you know, identify the hallmarks. And first you 17 testified it was five, and then later on -- you 18 said there is more.</p> <p>19 Are you able to do that? These are the 20 hallmarks, one, two, three, four, five, can you do 21 that?</p> <p>22 A. I just did that. I just went over them. 23 I didn't enumerate them.</p> <p>24 Q. Okay.</p> | <p>1 hearing that background noise? 2 MR. SULLIVAN: A little bit. 3 MR. BAZAREK: It sounds like someone's running 4 a shower. 5 THE COURT REPORTER: Yeah. 6 THE WITNESS: I'm not. 7 MS. KLEINHAUS: I feel left out. I'm not 8 hearing that. 9 MS. EKL: I hear it. 10 THE COURT REPORTER: Chris, is there anything 11 you can do about that? 12 THE VIDEOGRAPHER: I don't hear it. I'll 13 check the recording. 14 THE COURT REPORTER: Okay. I'll just deal 15 with it. 16 MR. BAZAREK: Are we trying to figure it out, 17 or are we rolling? 18 THE COURT REPORTER: No, we're rolling. 19 THE VIDEOGRAPHER: We're still rolling. 20 BY MR. BAZAREK: 21 Q. All right. Dr. Redlich, I know we 22 talked about this. Look at the bottom of Page 8 of 23 your report.</p> <p>24 A. Okay.</p> |
| <p style="text-align: center;">Page 166</p> <p>1 A. But I just went over them. Given the 2 three risk factors, the package plea deal, the 3 futility of trial, and excessive plea discount, 4 there are some risk factors, which I named. I 5 didn't number them because I lost count. And then 6 there's the drug cases and the no crime type. 7 MR. BAZAREK: Okay. Let's -- what time is it? 8 Let's take a ten-minute break. 9 MS. KLEINHAUS: Okay. 10 THE VIDEOGRAPHER: We're going off the record 11 at 1:42 p.m. 12 (WHEREUPON, a recess was had.) 13 THE VIDEOGRAPHER: Back on the record at 14 1:59 p.m. 15 BY MR. BAZAREK: 16 Q. Dr. Redlich, earlier you had testified 17 that false guilty pleas are more common in drug 18 cases, is that correct?</p> <p>19 A. The results of my 2023 study showed 20 that, yes. They're five times more -- so let me 21 put it another way. In comparison to wrongful 22 convictions by trial, they were five times more 23 common. 24 THE COURT REPORTER: Excuse me. Is anyone</p> | <p style="text-align: center;">Page 168</p> <p>1 Q. And I'll just -- the last paragraph, and 2 you write, "Mr. Baker's case is a complex one as it 3 involves multiple arrest cases, whereas Ms. Glenn 4 did not have a criminal record prior to the case at 5 hand."</p> <p>6 Do you see that?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And you recall earlier in this 9 deposition I was asking you about Mr. Baker's 10 arrest history, right?</p> <p>11 A. Right.</p> <p>12 Q. And do you remember you testified, that 13 doesn't matter. It doesn't matter what he has.</p> <p>14 It's about what happened for this case.</p> <p>15 Do you remember that exchange we had?</p> <p>16 MS. KLEINHAUS: Objection to form, 17 argumentative.</p> <p>18 You can answer.</p> <p>19 BY THE WITNESS:</p> <p>20 A. Yes. But what my point is here is that 21 Ms. Glenn's case wasn't complicated because it 22 didn't involve multiple arrests and cases, where 23 Mr. Glenn's -- I'm sorry, Mr. Baker's case, the 24 plea -- the September 26, 2006 plea was influenced</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 169</p> <p>1 by all these other cases that were going on, and a 2 lot of the materials I reviewed would talk about 3 these other cases, the bullet case, the mailbox 4 case, you know, and it made it more complicated. 5 Where Ms. Glenn's case wasn't as complicated 6 because it didn't have all of those other factors 7 affecting this plea. That's all I meant. 8 BY MR. BAZAREK: 9 Q. Well, right. But you still reference 10 that Glenn has no criminal record. So why don't 11 you mention that Ben Baker has multiple arrests 12 over his adult life, and he has multiple 13 convictions for various offenses? 14 MS. KLEINHAUS: Is there a question there or 15 are you just telling her that? 16 MR. BAZAREK: I thought there was a question. 17 But let's read it. Let's read it back. 18 (WHEREUPON, the record was read by 19 the reporter.) 20 MS. KLEINHAUS: I'm sorry. My objection is to 21 form, and the document speaks for itself. 22 Go ahead. 23 BY THE WITNESS: 24 A. I think you're confusing what I wrote</p> | <p style="text-align: center;">Page 171</p> <p>1 BY THE WITNESS: 2 A. Because by saying she had no criminal 3 record, which is the same thing as saying it's not 4 a complicated case. That's all I meant. 5 (WHEREUPON, a certain document was 6 marked Exhibit No. 2, for 7 identification, as of 4-25-24.) 8 BY MR. BAZAREK: 9 Q. Okay. Let's take a look at Deposition 10 Exhibit No. 2, and it's City-BG-062597 to 062603. 11 A. You'll have to bring that up. I did not 12 prepare to -- I did not read that again in 13 preparation for this deposition. 14 Q. We can -- hopefully, we can show it to 15 you. We'll just show it to you on the screen. 16 MS. EKL: Can you describe the document? I 17 took off the Bates stamps because it was making it 18 difficult for me to -- 19 MR. BAZAREK: Oh, sure. It's Ben Baker's 20 arrest history, also known as the rap sheet. It 21 looks like it's dated 2/7/24. 22 MS. EKL: Got it. Okay. Give me one second. 23 MR. BAZAREK: Okay.</p> |
| <p style="text-align: center;">Page 170</p> <p>1 and reading more into it than what I meant. All I 2 meant was that Mr. Baker's case, the present one 3 that I was asked to opine on, is complicated 4 because it's -- there's multiple arrests or cases 5 that impinge upon this specific case, whereas 6 Ms. Glenn doesn't have that. And I could have said 7 whereas Ms. Glenn does not have multiple arrests or 8 cases. I just chose to say she does not have a 9 criminal record which is to me the same exact 10 thing. Making it less complicated. That's all I 11 meant. 12 BY MR. BAZAREK: 13 Q. Okay. 14 A. I didn't mean to say that -- you know, 15 in my mind, it's not a contradiction to what I said 16 before. You're reading one into it that I did not 17 say or mean. 18 Q. Right. I understand what you meant. 19 All I'm asking is why didn't you include 20 Mr. Baker's criminal arrest history and prior 21 convictions in that sentence? 22 MS. KLEINHAUS: Okay. In that case, asked and 23 answered. 24 You can answer it again.</p> | <p style="text-align: center;">Page 172</p> <p>1 BY MR. BAZAREK: 2 Q. Okay. 3 A. I need that. So I looked at that? It's 4 on my list. 5 Q. No, I didn't see it on your list. 6 A. Okay. I thought it was something I 7 looked at. 8 Q. No. So is this -- this is a Chicago 9 Police Department arrest history for a convicted 10 felon named Ben Baker. 11 Do you see that? 12 A. Yes. 13 Q. Okay. Is this the first time you've 14 reviewed or even saw Ben Baker's arrest history? 15 A. I don't remember seeing this. Yeah, so 16 I guess so, yeah. 17 Q. Okay. So is it your testimony then you 18 don't know how many prior convictions Ben Baker has 19 that occurred prior to 2006? 20 A. No. I think I said that. Yeah, I don't 21 know. 22 Q. Okay. And do you have any information 23 on what Ben Baker had been arrested for prior to 24 2004?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 173</p> <p>1 MS. KLEINHAUS: Objection -- 2 BY THE WITNESS: 3 A. I mean, I'll -- 4 MS. KLEINHAUS: You can answer. 5 BY THE WITNESS: 6 A. I'll just say I do know about one 7 conviction, the one that happened in my report, the 8 one that happened with Judge Toomin a few months 9 earlier. So I do know about that. And I do 10 remember reading -- not seeing this sheet, not 11 seeing the whole rap sheet, but I remember seeing 12 something in one of the depositions or questioning 13 of Mr. Baker about attempted murder conviction. 14 But I didn't know anything about it. And, as I 15 said, they're just not relevant to my analysis of 16 the guilty plea in this specific case.</p> <p>17 MR. BAZAREK: Okay. We can take that down. 18 (WHEREUPON, a certain document was 19 marked Exhibit No. 3, for 20 identification, as of 4-25-24.)</p> <p>21 BY MR. BAZAREK: 22 Q. And let's look at -- I want to show you 23 one more exhibit. And this is your invoice for the 24 work that you did in this case. It was your</p> | <p style="text-align: center;">Page 175</p> <p>1 BY THE WITNESS: 2 A. Yeah. So this would have been much 3 earlier. I don't know when. And I don't charge 4 for those types of initial phone calls. Most of 5 them I don't take the cases on.</p> <p>6 BY MR. BAZAREK: 7 Q. Well, okay. Now I'm confused. Was 8 it -- were you being contacted about the 9 Baker-Glenn case when he called you on the phone or 10 it was just something else?</p> <p>11 MS. KLEINHAUS: I'm just going to direct you 12 not to get into the contents of your conversations 13 with Mr. Tepfer and the scope of it.</p> <p>14 I think she's answered the question that 15 he's the person who initially contacted her and 16 that it was well before the dates on this invoice. 17 I think going beyond that invades the privileges 18 under Rule 26.</p> <p>19 MR. BAZAREK: Well, Ms. Kleinhaus, I would 20 agree with you if he's contacting her about the 21 Baker-Glenn case, but based on Dr. Redlich's 22 testimony, it sounds like he could have been 23 calling her for something else.</p> <p>24 MS. KLEINHAUS: She's already testified that</p> |
| <p style="text-align: center;">Page 174</p> <p>1 response to a subpoena. I don't know if we can 2 show that. It's dated April 12, 2024. 3 And, I mean, obviously, I can read it, 4 but it looks like you put in 18.75 hours in your 5 review of this case, is that right? 6 A. Yes. 7 Q. And remember earlier in your deposition 8 you talked about your Facebook friend Mr. Tepfer 9 had called you on the phone about this case? 10 A. Yes. 11 Q. So, yeah, I don't see any reference to 12 that on this invoice. So when did he call you? 13 A. So this was a long time ago. It wasn't 14 specific to the Baker-Glenn case. It was just 15 asking about -- 16 MS. KLEINHAUS: If you can just not -- I'm 17 sorry. If you can just not reveal the contents of 18 your conversation -- 19 THE WITNESS: Okay. 20 MS. KLEINHAUS: -- with Mr. Tepfer. You can 21 say when he first contacted you about this report 22 and I guess whether or not that's reflected on an 23 invoice. 24</p> | <p style="text-align: center;">Page 176</p> <p>1 he was the one who first contacted her about the 2 expert work in the Baker-Glenn case. So I'm 3 directing her not to go into any further detail 4 about the contents. I don't think the contents are 5 discoverable under Rule 26.</p> <p>6 THE WITNESS: Can I clarify? Because I don't 7 think I testified that he was the one who contacted 8 me about Baker-Glenn specifically. At that point 9 in time, we were talking about the Watts case, and 10 he was the first time that I heard about -- sorry.</p> <p>11 MS. KLEINHAUS: No, that's okay. I think 12 that's sufficient.</p> <p>13 BY MR. BAZAREK: 14 Q. Okay. So then let me make -- and, 15 again, that's not -- it would have occurred prior 16 to December 19th, 2023, correct? 17 A. Correct. 18 Q. All right. And then what -- if you know 19 or recall about when was it in relation to 20 December 19, 2023? Was it a year before? Two 21 years before? Three years before? Six months? 22 A. I don't know for sure. 23 Q. Okay. Tell me, when you review a case, 24 do you take notes?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 177 | Page 179 |
|--|--|
| <p>1 A. No, not really.</p> <p>2 Q. How do you keep it all straight in your 3 head? You said this is a complex case.</p> <p>4 A. Well, I do take notes on, like, the 5 number of the time that I've spent working, like, 6 on that specific day. That I need to take notes on 7 otherwise I would never remember.</p> <p>8 Q. So, for instance, you know, there's an 9 appendix and it lists the materials that you 10 reviewed in your case -- in this case, right?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. So if you're, say, reviewing a 13 deposition, Ben Baker's deposition -- remember I 14 asked you questions about what he said at his 15 deposition? Do you remember that?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. So when you're reviewing a 18 deposition, do you take notes of some point you 19 want to remember or something that you'll rely on 20 in forming your opinions in this case?</p> <p>21 A. Not notes, but sometimes I will 22 highlight.</p> <p>23 Q. So, say, a deposition, you'll highlight 24 certain portions, is that correct?</p> | <p>1 that's included in your report? I just forgot? Is 2 it in your report?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. So let's -- and I want to go 5 back -- I'll just read it to you. On Page 8 of 6 your report, it's Section III, "Ben Baker and 7 Clarissa Glenn are two of hundreds of individuals 8 wrongfully convicted as part of the Watts scandal."</p> <p>9 So where in the materials that you 10 reviewed in your appendix is that information?</p> <p>11 A. As I've said, I don't remember.</p> <p>12 Q. Well, I'm --</p> <p>13 MS. KLEINHAUS: I'm going to object to this 14 line of questioning. You've done it twice already 15 about the source of this material. She's told you 16 she doesn't know. So it's harassing to ask someone 17 the same question over and over again for hours.</p> <p>18 BY MR. BAZAREK:</p> <p>19 Q. Well, did -- okay. Dr. Redlich, that 20 sentence that I just read to you, is it found 21 anywhere in the items that are referenced in your 22 appendix?</p> <p>23 MS. KLEINHAUS: Objection to form, foundation.</p> <p>24 You can answer.</p> |
| Page 178 | Page 180 |
| <p>1 A. Yeah.</p> <p>2 Q. And do you do the same thing with 3 affidavits or other materials, you'll highlight 4 something?</p> <p>5 A. Yeah. I mean, some I won't highlight 6 anything because I don't find it relevant. Like, I 7 don't know if it's relevant until I read it.</p> <p>8 Q. Well, did you highlight any materials 9 that you've identified in the appendix?</p> <p>10 A. I'm going to look at my appendix again.</p> <p>11 I would probably -- yeah, I would say 12 so.</p> <p>13 Q. Would you review, like, all the 14 materials -- strike that.</p> <p>15 Would you highlight certain portions of 16 all the materials you reviewed in your -- that are 17 listed in your appendix?</p> <p>18 A. No, no. I'm sure that I didn't. Like 19 the Baker medical records, I didn't find helpful at 20 all. Yeah, there was -- you know, the podcast I 21 just listened to. Yeah.</p> <p>22 Q. Let me -- it's good that you have the 23 appendix up because I do have a question for you.</p> <p>24 And right now you're looking at the appendix, and</p> | <p>1 BY THE WITNESS:</p> <p>2 A. I don't remember. I mean, I'm looking 3 at the list. Maybe from the podcast. It might 4 have been updated. I know that I had a similar 5 statement in my Waddy report. Maybe even the same 6 statement. I don't remember.</p> <p>7 BY MR. BAZAREK:</p> <p>8 Q. Okay. All right. So you're just 9 parroting what Mr. -- Mr. Tepfer is saying during a 10 podcast?</p> <p>11 MS. KLEINHAUS: Objection to form, 12 argumentative and harassing.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I didn't say anything like that.</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. Well, are those your words that you're 17 using in that first sentence or are those 18 Mr. Tepfer's words?</p> <p>19 A. I wrote the statement. I don't remember 20 the source of the statement.</p> <p>21 I'm feeling harassed with these 22 questions in that I've answered it several times.</p> <p>23 Like, at least ten times. I don't recall where 24 that statement came from.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: center;">Page 181</p> <p>1 Q. How would you figure out where that 2 statement came from?</p> <p>3 A. I guess it's lost to the sands of time. 4 I don't know. I really don't know. I could look 5 in my Waddy report and see if the statement -- I 6 know that I had a similar statement, if not the 7 same statement. I'm not sure.</p> <p>8 Q. But you would agree there's some source 9 for the information you wrote in that first 10 sentence? You didn't make it up out of whole 11 cloth, right?</p> <p>12 A. I agree with that.</p> <p>13 MR. BAZAREK: That's all I have at this time.</p> <p>14 EXAMINATION</p> <p>15 BY MR. SULLIVAN:</p> <p>16 Q. Hi, Dr. Redlich -- Redlich. I knew I 17 was going to do that. I just knew it.</p> <p>18 My name is Sean Sullivan. I represent 19 one of the defendants, Kallatt Mohammed. I have 20 just a relatively few follow-up questions. Mainly, 21 I want to make sure I come away today with a clear 22 understanding of what the opinions are that you 23 intend to offer to a jury at the trial in this 24 case.</p> | <p style="text-align: center;">Page 183</p> <p>1 A. No, that's the juror's -- jury's 2 responsibility.</p> <p>3 Q. Same question for Clarissa Glenn.</p> <p>4 A. Yes, it's the jury's responsibility. 5 So, no, I'm not intending to.</p> <p>6 Q. Okay. And then at another point in your 7 deposition today, I thought I heard you say that 8 you're here to give an opinion about the likelihood 9 that the pleas were true guilty pleas or false 10 guilty pleas.</p> <p>11 So, first, did I hear that correctly 12 from you?</p> <p>13 A. I don't recall. I'm not sure. I might 14 have said that. I don't remember the context or 15 the exact words.</p> <p>16 Q. Okay. Is that a correct statement of 17 the opinions you intend to offer to the jury? Do 18 you intend to offer an opinion about the likelihood 19 that either Ben Baker or Clarissa Glenn's guilty 20 pleas were true or false?</p> <p>21 A. Not per se, no. My job -- I see my job 22 to educate the jury about the risk factors that can 23 lead to -- can lead to false guilty pleas and how 24 they may or may not be present in the case of</p> |
| <p style="text-align: center;">Page 182</p> <p>1 And I recall at one point during today's 2 deposition you mentioned that you weren't intending 3 to give an opinion about the ultimate issue in the 4 case, which would be for the jury.</p> <p>5 Do you recall that?</p> <p>6 A. Yes.</p> <p>7 Q. And then sometime around then, or maybe 8 a little later in the deposition, I think you 9 identified what you viewed as the ultimate issue in 10 this case, at least in the subject area where 11 you're going to be offering testimony, is whether 12 the Baker and Glenn guilty pleas were true guilty 13 pleas or false guilty pleas, correct?</p> <p>14 A. Yes, and whether they were coerced or 15 not.</p> <p>16 Q. Okay. Do you view those as two 17 different things?</p> <p>18 A. Yes. So there's voluntariness and 19 reliability, and the reliability, I'm speaking 20 about whether it's true or false.</p> <p>21 Q. Okay. So let me just ask you then. Are 22 you intending to offer any opinion in this trial as 23 to whether Ben Baker's guilty plea was a true 24 guilty plea or a false guilty plea?</p> | <p style="text-align: center;">Page 184</p> <p>1 Clarissa and Ben.</p> <p>2 Q. Okay. Because in reviewing your report 3 and listening to your testimony today, I don't 4 think you offered any information about the 5 likelihood, one way or the other, that either of 6 their pleas was true or false, correct?</p> <p>7 MS. KLEINHAUS: Objection to form.</p> <p>8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. Well, I do say that there's many 11 hallmarks for false guilty plea cases, and that 12 their -- in my overall summary, I say, "...their 13 decisions to plead guilty are consistent with the 14 factors present in their cases which are common to 15 hundreds of false guilty plea cases of other 16 defendants who are later exonerated..."</p> <p>17 BY MR. SULLIVAN:</p> <p>18 Q. Okay. In that paragraph, since you've 19 gone to reference that, you state in that paragraph 20 what the likelihood is that Mr. Baker's guilty plea 21 was either true or false?</p> <p>22 MS. KLEINHAUS: Objection to form.</p> <p>23 You can answer.</p> <p>24 MR. SULLIVAN: What's wrong with the form?</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 185 | Page 187 |
|---|--|
| <p>1 I'll fix it. 2 BY THE WITNESS: 3 A. No, I didn't say anything about that. 4 MS. KLEINHAUS: Sorry. My answer is just 5 vague as to the term "likelihood." 6 BY MR. SULLIVAN: 7 Q. Okay. And, again, maybe this is because 8 I didn't hear your answer correctly, but I want to 9 make sure that if you intend to give an opinion 10 that either Mr. Baker's or Ms. Glenn's guilty plea 11 was, you know, more likely false or more likely 12 true, I want to know exactly what that opinion is 13 and what it's based on. 14 So can you point to me anywhere in your 15 report where you express any opinion about the 16 likelihood as to either of these plaintiffs' guilty 17 pleas being true or false? 18 A. Is that what you mean by "likelihood"? 19 Like, more likely than not or something -- is that 20 what you -- 21 Q. Let me ask it this way: You don't know 22 one way or another whether one possibility between 23 a true guilty plea and a false guilty plea is more 24 likely than the other for Mr. Baker?</p> | <p>1 A. No. On a scale of 100, no. 2 Q. Well, on any scale? 3 A. No. 4 Q. Okay. And then we have -- you had some 5 discussion, and there's some mention in your 6 report, about the sort of standard reviews of 7 guilty pleas being knowing, intelligent, and 8 voluntary. 9 Do you recall that? 10 A. No. Can you be more specific? The 11 colloquy? 12 Q. That's what I'm going to get to. But 13 are those the three things that are generally 14 examined to determine whether to accept by a judge 15 a guilty plea: Normal, voluntary, and 16 intelligence? 17 A. And a factual basis of guilt. 18 Q. Okay. And then you spent some time 19 talking about, you know, whether there was any way 20 for you to assess whether either Mr. Baker or 21 Ms. Glenn, you know, had a failure of understanding 22 about what they were doing, what the consequences 23 were, and things like that. 24 Do you recall that? Do you remember</p> |
| <p>1 MS. KLEINHAUS: Objection to form. 2 You can answer. 3 BY THE WITNESS: 4 A. I would talk about now how there are 5 factors consistent with other false guilty plea 6 cases and let the jury come to their own 7 conclusion. 8 BY MR. SULLIVAN: 9 Q. So you don't know one way or another 10 whether it's more likely or less likely that 11 Mr. Baker's guilty plea was a false guilty plea? 12 MS. KLEINHAUS: Just objection to form, 13 incomplete hypothetical. 14 You can answer. 15 BY THE WITNESS: 16 A. Do I know with 100 percent certainty? 17 BY MR. SULLIVAN: 18 Q. That wasn't my question. 19 A. No. I'm not sure what the question is. 20 Would I testify to that? No. 21 Q. Would you testify to any division of 22 probability with respect to Mr. Baker or Ms. Glenn 23 between it being a true guilty plea or a false 24 guilty plea?</p> | <p>1 that testimony? 2 A. Yes. 3 Q. Okay. Am I correct that that area of 4 understanding goes towards the knowing element of a 5 guilty plea? 6 A. I would say knowing and intelligence. 7 Q. Okay. So -- all right. So that leaves 8 voluntary and factual basis. 9 Are the three main factors -- risk 10 hazards -- risk factors that you identified with 11 respect to Mr. Baker and Ms. Glenn all directed 12 towards the voluntariness aspect? 13 A. And the factual basis. 14 Q. Okay. Well, let me explore those one at 15 a time, and that will help me understand. 16 You have some criticism -- I'll call it 17 criticism -- in your report about the manner in 18 which courts make that assessment. As you referred 19 to a minute ago, the colloquy between the court and 20 the defendant asking a series of questions for the 21 judge to make a determination about knowing, 22 voluntary, and intelligent. 23 So my question is in your experience in 24 any of the jurisdictions where you've been involved</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: right;">Page 189</p> <p>1 in cases, observed criminal proceedings, is that 2 method of assessing pleas -- is it the pretty 3 standard way that the courts do that? 4 A. Yes. 5 Q. Okay. 6 A. Yes. 7 Q. Are you aware of any jurisdiction, 8 whether because you worked in that or observed that 9 jurisdiction or through other means, where courts 10 have determined that method of assessing a plea is 11 deficient or, you know, not acceptable as a way to 12 take in guilty pleas? 13 A. I have observed specific judges when 14 they themselves feel that it's insufficient, and 15 they feel like the defendant doesn't understand, 16 and they're not satisfied with their yes responses, 17 they will go into expanded definitions or expanded 18 colloquy. And I'll also say that right now, I'm on 19 an advisory panel of the National Center for State 20 Courts, and they are -- and I'm with a bunch of 21 other judges -- not other, but judges, three or 22 four judges, and we are trying to address this 23 issue. So I do believe that it is an issue on the 24 radar of important groups, like the National Center</p> | <p style="text-align: right;">Page 191</p> <p>1 but, yes, I agree with that statement for sure. 2 Q. Okay. And, in fact, logically, most, if 3 not all, defendants who get convicted at trial pled 4 not guilty, right? 5 MS. KLEINHAUS: Objection, foundation. 6 You can answer. 7 BY THE WITNESS: 8 A. Yes, because they all enjoy the 9 presumption of innocence and have the 10 constitutional right to a trial. 11 BY MR. SULLIVAN: 12 Q. Absolutely right. And I'm not 13 criticizing for that. 14 So let's go to the three factors that 15 you outlined as being relevant to the Baker and 16 Glenn case: The futility of trial, the package 17 plea, and the sentence discount. 18 And I apologize if you've covered this 19 in your prior answers, but you identify them as 20 risk factors, and I'm wondering if you could just 21 explain what you mean by a risk factor. 22 A. Here, specifically, I'm talking about a 23 factor that would increase their risk of a false 24 guilty plea from an innocent defendant.</p> |
| <p style="text-align: right;">Page 190</p> <p>1 for State Courts. 2 I'll also add that in research that I've 3 done and that other people have done, in surveys of 4 judges and attorneys when they're asking, do you 5 think defendants understand the colloquy, maybe not 6 those exact questions, but getting at those 7 questions, significant percentages of them will say 8 no, I don't think that defendants understand. But 9 it is the standard way of conducting colloquies. 10 THE COURT REPORTER: You're on mute. 11 BY MR. SULLIVAN: 12 Q. I set my hand down on the space bar. 13 A. You're on mute again. 14 Q. Okay. All right. So I was directing 15 you to Page 2 -- 16 A. Okay. 17 Q. -- of your report, and the statement I 18 wanted to ask you about where you say, "Not every 19 defendant who pleads guilty is factually guilty," 20 right? 21 A. Yes. 22 Q. Would you agree that not every defendant 23 who pleads not guilty is factually not guilty? 24 A. I think I know what you're getting at,</p> | <p style="text-align: right;">Page 192</p> <p>1 Q. Okay. And Mr. Bazarek and you discussed 2 that those same factors that you went through would 3 influence a guilty defendant to plead guilty as 4 well, right? We're in agreement on that? 5 A. Yes. 6 Q. And whether they're factually guilty or 7 factually not guilty, a defendant who chooses to 8 plead guilty is giving up certain rights, correct? 9 A. Correct. 10 Q. They have a right to take their case to 11 trial and make the government prove them guilty 12 beyond a reasonable doubt, right? 13 A. Yes. 14 Q. They have a right to have a jury make 15 that determination? 16 A. Yes. 17 Q. And they have a right to present 18 witnesses in their own defense? 19 A. Yes. 20 Q. And so for those factually guilty 21 defendants who plead guilty, they're giving up 22 those same rights that, you know, a potentially 23 factually not guilty defendant is giving up, right? 24 A. Yes.</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 193</p> <p>1 Q. And they have to make a similar decision 2 about risk/reward, cost/benefit, true?</p> <p>3 MS. KLEINHAUS: Objection, form.</p> <p>4 You can answer.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Yes.</p> <p>7 BY MR. SULLIVAN:</p> <p>8 Q. Let's point to the trial futility as one 9 example. A factually guilty -- well, strike that.</p> <p>10 Any defendant who's pleading guilty, 11 regardless of whether they're factually guilty or 12 not guilty, part of the assessment of trial 13 futility is looking at the evidence against them, 14 correct?</p> <p>15 THE COURT REPORTER: I'm sorry. What was the 16 answer?</p> <p>17 BY THE WITNESS:</p> <p>18 A. I said when they have the evidence 19 against them, yes.</p> <p>20 BY MR. SULLIVAN:</p> <p>21 Q. Okay. So am I right that this factor of 22 trial futility, the existence of the futility or 23 the low probability of success at trial for a 24 particular defendant doesn't indicate one way or</p> | <p style="text-align: center;">Page 195</p> <p>1 BY THE WITNESS: 2 A. I think it can when it's examined in 3 relation to all the other factors. And it's also, 4 you know, a defendant is making a calculation. So 5 the bargaining in the shadow of the trial theory, 6 it is actually a numeric theory where, you know, if 7 they believe that they have a 50 percent chance of 8 conviction at trial versus a 75 percent chance 9 versus a 95 percent chance, that is going to affect 10 the plea that they're going to take.</p> <p>11 BY MR. SULLIVAN:</p> <p>12 Q. And that's true whether they're 13 factually guilty or not guilty, right?</p> <p>14 A. Yes. But in their case, you know, I 15 would -- I would imagine that -- and they said, you 16 know, not just imagined, but they are -- Mr. Baker 17 and Ms. Glenn believed that their chances of 18 conviction at trial were very high because of what 19 happened with Mr. Baker and the previous 20 conviction, and because the evidence wasn't 21 admissible, and, you know, because of the 22 credibility issues. So they believed that their 23 possibility of conviction was very high. And if it 24 wasn't that high, then it's less likely that an</p> |
| <p style="text-align: center;">Page 194</p> <p>1 another whether their guilty plea is true or false 2 standing alone? Do you agree with that?</p> <p>3 A. I think what I'm saying in my report is 4 that this factor increases the likelihood that an 5 innocent person would plead guilty.</p> <p>6 Q. I understand that. But this factor 7 standing alone doesn't tell you whether a 8 particular defendant's guilty plea is true or 9 false, correct?</p> <p>10 A. I'm processing what you're saying.</p> <p>11 Q. Okay. All right.</p> <p>12 A. Standing alone, it wouldn't be 13 definitive, no. It would be a factor in the 14 totality of circumstances.</p> <p>15 Q. Okay. Well, is there anything in 16 looking at the futility of going to trial, or, you 17 know, maybe short of being futile, a low 18 probability of being acquitted -- is there anything 19 in that assessment -- though it may explain a 20 reason why a particular defendant pleads guilty, 21 does it offer you any insight into whether that 22 guilty plea is true or false?</p> <p>23 MS. KLEINHAUS: Objection to form.</p> <p>24</p> | <p style="text-align: center;">Page 196</p> <p>1 innocent person would take that guilty plea. They 2 might take their chances at trial.</p> <p>3 Q. How much less?</p> <p>4 A. That I can't -- that's going to vary on 5 a lot of different -- the totality of the 6 circumstances analysis. You know, I can't put a 7 stock number.</p> <p>8 Q. Sure.</p> <p>9 A. But there is -- I mean, the bargaining 10 in the shadow of the trial does have exact numbers 11 compared to the discount that they would be 12 receiving. And in this case, the discount was 13 extremely high, 94 to 100 percent.</p> <p>14 Q. So I'm just trying to understand. If we 15 take the futility of trial element, are you aware 16 of anything, any studies or theories that are able 17 to identify -- if we have one set futility number, 18 90 percent chance of conviction, based on the 19 evidence, the judge's rulings, and all of that.</p> <p>20 Are you aware of any studies or theories 21 that can identify the difference in the impact of 22 that 90 percent on a factually guilty defendant or 23 versus a factually not guilty defendant?</p> <p>24 A. Yeah, there's lots of studies that have</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 197 | Page 199 |
|--|---|
| <p>1 looked at it in -- I mean, not with actual 2 defendants, but with giving people different 3 scenarios, they're innocent, they're guilty. 4 There's lots of studies demonstrating that innocent 5 people are more likely to plead guilty when their 6 chances of conviction at trial are harder -- are 7 higher.</p> <p>8 Q. No, I understand that. And that's true 9 of guilty defendants as well, correct? I mean, we 10 just -- we're kind of --</p> <p>11 A. Yeah, it's guilty and innocent 12 defendants. And this is the degrees of difference 13 between them, yes. And people have tested the 14 shadow of the trial theory. So you're asking me 15 about theoretical models. I'm telling you about 16 the trial -- the bargaining in the shadow of the 17 trial, and there have been many studies that have 18 examined and tested for this.</p> <p>19 Q. And have they identified the difference 20 between factually guilty and not guilty defendants 21 and how that say, you know, trial probability 22 affects their decision-making?</p> <p>23 A. So with not -- not actual defendants 24 because in the real world, we don't know who's</p> | <p>1 guilty. I'd like to think that. I think that's 2 true. But I can't off the top of my head give 3 you -- so it increases -- as the trial conviction 4 goes up, and as the discount gets larger, both 5 guilty and innocent people are more likely to plead 6 guilty. I can't remember off the top of my head 7 specific numbers. These are not my studies, but 8 other people's studies.</p> <p>9 Q. Okay. Let me ask you a more general 10 question. Am I -- would the research that you do 11 be considered social science research?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. So am I correct that social 14 science research, similar to what you've been 15 involved in through your career, is designed to 16 examine large groups, societal groups, and impacts 17 on larger groups than individuals?</p> <p>18 A. It depends on the issue, but, in 19 general, yes, we are trying to generalize to 20 issues.</p> <p>21 Q. Okay. And so are you aware of any 22 studies, or do you rely on any studies in your 23 field of expertise, that allow you to -- well, 24 strike that.</p> |
| Page 198 | Page 200 |
| <p>1 factually guilty and who's factually innocent. We 2 can do that in a laboratory. So there's been lots 3 of laboratory studies. But in the real world, we 4 just don't know that, and that's the beauty of why 5 lab studies and -- you know, the limitations of lab 6 studies.</p> <p>7 Q. So in the lab, are you telling me 8 there's studies that find that --</p> <p>9 A. Yes. I'm telling you that, yes.</p> <p>10 Q. Okay. I haven't told you what I'm 11 asking about.</p> <p>12 A. But you've asked it several times. 13 Sorry.</p> <p>14 Q. So my question is studies that have 15 found -- identified the range of difference in the 16 impact of trial futility on a guilty defendant 17 versus a not guilty defendant?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. What is the difference in the 20 range?</p> <p>21 A. Well, it's very consistently that guilty 22 people are pleading guilty at higher rates. So 23 that's a very consistent finding, and that's why I 24 presume that most defendants who plead guilty are</p> | <p>1 We discussed earlier that you're not 2 offering any opinion about the likelihood of either 3 of these two plaintiffs' guilty pleas being true or 4 false, correct? You're talking about factors and 5 so forth, but you're not going to talk about the 6 likelihood that in this particular case, for these 7 individuals, their pleas were true or false, right?</p> <p>8 MS. KLEINHAUS: Objection to form. 9 BY THE WITNESS: 10 A. Correct. 11 BY MR. SULLIVAN: 12 Q. Okay. So am I correct that there really 13 is no empirical studies or science in your field of 14 expertise that would allow you to make that 15 determination of whether -- of the likelihood 16 between either of these plaintiffs' pleas being 17 guilty or true?</p> <p>18 MS. KLEINHAUS: Objection to form. 19 You can answer. 20 BY THE WITNESS: 21 A. I'm not sure I understand the question. 22 BY MR. SULLIVAN: 23 Q. Sure. The type of social science 24 research that you engage in in your field does not</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|--|
| <p style="text-align: center;">Page 201</p> <p>1 provide data or tools with which you could make an 2 assessment of the likelihood between Ben Baker's 3 guilty plea being true or false in this case?</p> <p>4 MS. KLEINHAUS: Objection to form, and 5 mischaracterizes her testimony.</p> <p>6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I don't think that's true. I think 9 that -- I mean, it can lead to educated opinions. 10 And I think once people have an understanding of 11 the science of false guilty pleas and why, the 12 factors that would influence somebody to plead 13 guilty -- I mean, that's what the jury does in all 14 cases. Nobody knows in a jury if somebody is 15 actually guilty or actually innocent. They must 16 decide beyond a reasonable doubt whether they think 17 this person is guilty or not. And so that's true I 18 think of every expert or every witness in a way.</p> <p>19 BY MR. SULLIVAN:</p> <p>20 Q. Okay. I apologize if this is a little 21 bit of a repeat.</p> <p>22 Are there any of the factors that you 23 identify in your report that are not equally 24 applicable to factually guilty and factually not</p> | <p style="text-align: center;">Page 203</p> <p>1 they're going to try to take their case to trial, 2 right, because they're innocent. They want to 3 fight their case. But these factors that I 4 discussed increase the likelihood of an innocent 5 person waiving all of those rights that they have 6 and the presumption of innocence and giving up 7 their right to trial.</p> <p>8 Q. Okay. And those three factors are 9 applicable to factually guilty defendants also, 10 correct?</p> <p>11 MS. KLEINHAUS: Objection, asked and answered.</p> <p>12 You can answer again.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Yes.</p> <p>15 BY MR. SULLIVAN:</p> <p>16 Q. Okay. And then the rest of your answer 17 about increasing the likelihood of a factually not 18 guilty defendant pleading guilty, that's an 19 increase that you can't identify how much it 20 increases, correct?</p> <p>21 MS. KLEINHAUS: Objection to form. You mean, 22 like, numerically? Percentagewise?</p> <p>23 MR. SULLIVAN: Yeah. Let's start with that.</p> <p>24 MS. KLEINHAUS: Okay. I just need that</p> |
| <p style="text-align: center;">Page 202</p> <p>1 guilty defendants?</p> <p>2 MS. KLEINHAUS: Objection to form.</p> <p>3 BY THE WITNESS:</p> <p>4 A. So, I mean, I did make some comparisons 5 between the true and the false guilty pleas, like 6 the drug cases and the no crime cases. But true 7 guilty pleas happen in -- I'm sorry, not true 8 guilty pleas. Wrongful convictions like in drug 9 cases happen at trial as well as false guilty 10 pleas.</p> <p>11 BY MR. SULLIVAN:</p> <p>12 Q. Right. I'm talking about the three 13 factors, the trial futility, the discount, and the 14 package plea.</p> <p>15 Are there any of those three risk 16 factors that you focused on that are not applicable 17 to a factually guilty defendant?</p> <p>18 A. What I was trying to say earlier is that 19 those factors are almost like a given in truly 20 guilty cases, that they are going to raise the 21 likelihood of a guilty person pleading guilty. But 22 what they also do is raise the likelihood of an 23 innocent person, who otherwise would not plead 24 guilty because it's not in their best interest,</p> | <p style="text-align: center;">Page 204</p> <p>1 clarification versus relative or numerically. 2 So go ahead.</p> <p>3 BY THE WITNESS:</p> <p>4 A. In this specific case, I cannot assign a 5 percentage. But in the studies that I mentioned, 6 yes, there would be percentages. I don't know them 7 off the top of my head.</p> <p>8 BY MR. SULLIVAN:</p> <p>9 Q. And are you able to provide a 10 comparative between factually guilty and factually 11 not guilty defendants, between how much any of 12 those three factors increase the likelihood they 13 will plead guilty?</p> <p>14 A. I'm sorry. Can you repeat the question? 15 It's getting a little late in the day for me.</p> <p>16 Q. Sure. Well, Tess had asked whether I 17 was talking numerically or then comparatively. So 18 are you able to give a comparative between the 19 increase in guilty pleas based on those factors 20 among factually guilty versus the increase based on 21 those factors among factually not guilty?</p> <p>22 A. With those lab studies, yes, I believe 23 that I could.</p> <p>24 Q. Are those -- now did you participate in</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|---|---|
| <p style="text-align: center;">Page 205</p> <p>1 those? 2 A. No. The ones that I'm thinking of, no. 3 Q. Can you identify by title or author or 4 year? 5 A. I can send you that information. There 6 was a recent one published in Law and Human 7 Behavior by Zottoli and colleagues that I think it 8 was published in 2023. 9 Q. Go ahead. Sorry. 10 A. Yeah. There's some research by Tina 11 Zottoli, Z-O-T-T-O-L-I. 12 Q. And are those studies or that study 13 something you relied on in your -- for the 14 conclusions in your report? 15 A. No. 16 Q. Are those studies or that study 17 something you intend to rely on as part of your 18 trial testimony? 19 MS. KLEINHAUS: Objection, calls for 20 speculation. 21 You can answer. 22 BY THE WITNESS: 23 A. If you're going to ask me these 24 questions, yes, I would prepare for it, yes.</p> | <p style="text-align: center;">Page 207</p> <p>1 and conclusions as expressed in your report and in 2 your deposition here today, are those built on or 3 do they rely on in part your crediting Mr. Baker 4 and Ms. Glenn more than the police officers? 5 A. I'm not really sure how to answer that 6 question because what I did is I reviewed all of 7 the materials, and my opinions are based on the 8 review of all the materials. 9 So in reviewing the materials, I -- you 10 know, I don't know the truth of the matter, as 11 we've discussed. And, again, that's, you know, 12 something the jury is going to have to do beyond a 13 reasonable doubt or not, if that's the standard in 14 a civil case. I'm not sure. But, yeah, I mean -- 15 but my assessment, I did take that into account. 16 BY MR. SULLIVAN: 17 Q. Okay. 18 A. So the factors that -- you know, I think 19 that's a natural part of any expert's review when 20 there's a he said/she said. You know, I have to 21 determine -- you know, that's just one of the 22 factors in this case. 23 Q. Okay. So is it fair to say that after 24 your testimony and all the evidence is in, if the</p> |
| <p style="text-align: center;">Page 206</p> <p>1 BY MR. SULLIVAN: 2 Q. Which questions? About whether there's 3 any -- anything that identifies these ranges of 4 outcomes? 5 A. If there are precise percentage numbers, 6 differentials between true and false guilty pleas 7 relative to the probability of conviction at trial, 8 yes. 9 Q. Okay. All right. The last little group 10 of questions I had. And, again, I might have 11 misheard some of your testimony. 12 Do your opinions about whether the 13 hallmarks or the risk factors that you're relying 14 on in this case in your report -- do those depend 15 at all or are they built at all on your own 16 assessment or conclusion about the believability of 17 Mr. Baker or Ms. Glenn or the police officers? 18 A. Are my conclusions based on what? 19 Q. So there's some answers when you were 20 speaking with Mr. Bazarek about whether you would 21 credit Mr. Baker and Ms. Glenn more than the police 22 in this case. 23 A. Yeah. 24 Q. And my question is whether your opinions</p> | <p style="text-align: center;">Page 208</p> <p>1 jury accepts your opinions in this case and 2 incorporate that into their verdict, they will be 3 then relying in part on your assessment of how to 4 credit Mr. Baker and Ms. Glenn's testimony versus 5 the police officers? 6 MS. KLEINHAUS: Objection to form, vague and 7 compound, and calls for speculation. 8 You can answer, if you know. 9 BY THE WITNESS: 10 A. I don't think so because what I'm 11 really -- I think that my opinion is really based 12 on these three situational risk factors, and, in 13 part, on the other hallmarks that I mentioned about 14 the study that I did that compared wrongful 15 conviction cases, all people were innocent, and 16 they were either convicted by plea or at trial and 17 the findings that we had there. 18 So I think I will rescind my other 19 answer and say that my opinions in this case, which 20 are that they -- that these guilty pleas by Baker 21 and Glenn bear many of the hallmarks of a false 22 guilty plea and they have a lot of commonalities 23 with known proven false guilty pleas. Those are my 24 opinions, and they're based on those three factors,</p> |

55 (Pages 205 to 208)

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 209</p> <p>1 and the subfactors within those three factors, and 2 what I just mentioned. 3 BY MR. SULLIVAN: 4 Q. So if you had -- in reviewing the 5 materials had credited the police officers' 6 testimony or information more than Mr. Baker and 7 Ms. Glenn, would your opinions be the same in this 8 case? 9 A. Yes, they would. 10 MS. KLEINHAUS: Objection, hypothetical. Go 11 ahead. 12 BY THE WITNESS: 13 A. That's what I'm saying. I misspoke 14 earlier. I'm tired. It's been a long day. And I 15 don't believe that -- if I did credit their 16 statements more -- their account -- it's really 17 just the account of the event is what we're talking 18 about. 19 BY MR. SULLIVAN: 20 Q. That's a pretty important account, 21 right, one way or the other? 22 A. But in everything that I reviewed, all 23 the other information, then yeah. 24 Q. I'm sorry. I didn't understand the last</p> | <p style="text-align: center;">Page 211</p> <p>1 make a decision whether to take it. But if my 2 assessment was such that would not help the defense 3 or help the plaintiffs' side, and that's up to the 4 attorneys whether or not they want to use it or 5 not. But I'm not going to change my opinions. I 6 can't make those assessments when I agree or not 7 agree to take on a case. 8 BY MR. SULLIVAN: 9 Q. Sure. How about before you issue a 10 report or testify? Had -- after you reviewed all 11 the materials, had you concluded that the police 12 officers' story was more credible than Mr. Baker 13 and Ms. Glenn's story, would you have agreed to 14 testify at trial in this case? 15 MS. KLEINHAUS: Objection, calls for 16 speculation. 17 You can answer. 18 BY THE WITNESS: 19 A. I think I heard, like, a hypothetical in 20 there, "had I." Is that what you're saying? 21 BY MR. SULLIVAN: 22 Q. Right. 23 A. Yeah. I don't know. I mean, I don't 24 know because, again, the factors are still present.</p> |
| <p style="text-align: center;">Page 210</p> <p>1 part. 2 A. Yeah, just like I'm saying, I reviewed 3 all of the information that was provided to me. If 4 I had questions, I asked for additional 5 information. And, you know, that was -- that I 6 believe was relevant to the case, and I reviewed 7 it, and I came up with the -- these conclusions 8 that these risk factors that are present in their 9 case are known to increase the rate of false 10 confessions -- I'm sorry, false guilty pleas. 11 Q. So if in reviewing everything in the 12 case, doing all the work that you did, you had in 13 your own mind found the testimony about what 14 happened of the police to be more credible -- more 15 creditable than Mr. Baker and Ms. Glenn's, would 16 you have taken this case? 17 MS. KLEINHAUS: Objection, calls for 18 speculation. 19 You can answer. 20 BY THE WITNESS: 21 A. I don't make any kind of assessment like 22 that until I've already taken the case. I mean, 23 when I agree to take a case or not take a case, I 24 am given a minimal amount of details, and then I</p> | <p style="text-align: center;">Page 212</p> <p>1 MS. KLEINHAUS: I'm sorry, Sean. When you get 2 to a good point, can we take a short break? 3 MR. SULLIVAN: I'm finished, so I'll pass to 4 whoever is next, and we can take a break first. 5 MS. KLEINHAUS: Okay. That would be great. 6 Can we just take, like, a short five-minute break, 7 please? Thank you. 8 MR. SULLIVAN: Thank you, Doctor. 9 THE VIDEOGRAPHER: Going off the record at 10 2:58 p.m. 11 (WHEREUPON, a recess was had.) 12 THE VIDEOGRAPHER: Back on the record at 13 3:12 p.m. 14 (WHEREUPON, Mr. Joel Flaxman left 15 the deposition proceedings and 16 Mr. Kenneth Flaxman entered.) 17 MS. EKL: Am I up? Am I up? Can anyone hear 18 me? 19 Okay. Great. I don't see the doctor, 20 that's why -- 21 THE WITNESS: I'm here. 22 EXAMINATION 23 BY MS. EKL: 24 Q. Good afternoon, Dr. Redlich. I have</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 213</p> <p>1 just a few questions. I know it's been a long day. 2 A. Thank you. 3 Q. I represent the City of Chicago, and I 4 just wanted to follow up on one additional point, 5 one of the factors that you discussed today. 6 Specifically in regard to your opinions 7 related to extreme discounts that you say were 8 given to Ben Baker and Clarissa Glenn, I want to 9 ask you some questions about that. 10 A. Okay. 11 Q. How is it that you are calculating that 12 Ben Baker got a 95 percent discount and Clarissa 13 Glenn got 100 percent discount in their sentences 14 by pleading guilty versus going to trial? 15 A. Sure. So the plea discount that I'm 16 talking about specifically is a sentence discount. 17 And so for Clarissa, given that she wasn't given a 18 carceral sentence, her discount is essentially 19 100 percent. The 90 versus 0 years. 20 Whereas, Mr. Baker, what I did is -- so 21 Mr. Baker and Ms. Glenn were each facing three 22 counts of the Class X charges, and as described by 23 Judge Toomin in their plea hearing, the maximum 24 they could receive on each of those counts was</p> | <p style="text-align: center;">Page 215</p> <p>1 A. So this calculation is based on each of 2 the charges, and it doesn't matter if it was -- I 3 mean, I didn't do the consecutive. I assumed that 4 they were concurrent. Sorry. 5 Q. Well, if they were concurrent, and he 6 was looking at the maximum sentence for any charge 7 would be 30 years, that means the most he could 8 have got for multiple findings of guilty would be 9 30 years, correct? 10 A. Oh, sorry. Yes, yes, yeah. 11 Q. Okay. And for Ms. Glenn, what is your 12 understanding about how -- about what she -- what 13 the maximum number of years on the maximum charge 14 would be that she was originally facing? 15 A. She was also originally facing 30 years. 16 Q. Okay. So you would agree with me that 17 the maximum sentence she could have received, 18 unless there was some basis for running the 19 sentences consecutively, would be 30 years? 20 A. All I know is that Judge Toomin -- and I 21 do state specifically that I'm not an expert on 22 Illinois sentencing law, and I don't know what the 23 normal procedure -- what the normal sentence would 24 have been. All I know is that Judge Toomin, as is</p> |
| <p style="text-align: center;">Page 214</p> <p>1 30 years. So three times 30 is 90 years. And then 2 Mr. Baker also faced an additional maximum sentence 3 of five years on that gun bullet charge. But he 4 received a total of six years. So four years for 5 the minimum for what he pled guilty to, which was 6 the Class 1 -- one charge of the Class 1 count, and 7 then the two years that he received for the bullet 8 case. So that was six years. So the 94 percent 9 comes from the 95 years times .94 equals 89 years. 10 And that's where the six-year difference is, and 11 that's the 94 percent. 12 Q. Would you agree that a discount would be 13 what they would be likely to receive after a trial 14 versus what they actually did receive? 15 MS. KLEINHAUS: Objection to form. 16 You can answer. 17 BY THE WITNESS: 18 A. No, I wouldn't agree to that. 19 BY MS. EKL: 20 Q. Okay. So let me ask you this first off. 21 In relation to Ben Baker's case, for example, are 22 you familiar with Illinois sentencing laws and 23 whether or not those sentences would actually run 24 consecutive versus concurrently?</p> | <p style="text-align: center;">Page 216</p> <p>1 standard in these plea colloquies, will say what 2 the maximum sentence is for each of the charges. 3 He makes it very specifically that it's each charge 4 could be 30 years. 5 Q. Right. But he doesn't say that they 6 could run consecutively. So you're not adding 7 30 plus 30 plus 30. 8 A. But he does say each. He does make a 9 point of saying each, yeah. 10 Q. Okay. Do you know whether or not -- for 11 instance, Ms. Glenn, whether or not her original 12 charge that she was going to go to trial on was 13 probationable? 14 A. No, it wasn't. 15 Q. And do you know whether or not Ben 16 Baker's original charge was probationable? 17 A. I'm sure it wasn't. The Class X -- the 18 three Class X, no, no. 19 Q. Okay. The minimum, though, was the six 20 years, correct? 21 A. No -- well, that was combined with the 22 drug case. Yeah, because it was -- the minimum was 23 the four years for the Class 1 possession of a 24 controlled substance, and the two years was the</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 217 | Page 219 |
|--|--|
| <p>1 minimum for the bullet case.</p> <p>2 Q. Are you familiar with the laws in 3 Illinois -- and I will assume in other states as 4 well, but we're talking about Illinois law here -- 5 that dictate what the court must consider during a 6 sentencing?</p> <p>7 A. No, I'm not. But I do want to back up a 8 step and add that I still believe that regardless 9 of whether Ms. Glenn faced 30 years or 90 years, 10 her discount was still 100 percent because she 11 didn't receive any time.</p> <p>12 Q. And, again, that's assuming that her 13 case was not probationable, correct?</p> <p>14 A. Yes. I know that they had to reduce the 15 amount of the heroin to less than five grams to 16 make it probationable.</p> <p>17 Q. Going back to my question that you 18 didn't answer. Are you aware of the fact that 19 sentencing judges in Illinois must consider certain 20 things in determining a sentence?</p> <p>21 A. I did answer that question. I said I'm 22 not aware of those factors.</p> <p>23 Q. Okay. So are you aware of the fact in 24 general that judges have to consider factors in</p> | <p>1 A. Yes. But can I say something else?</p> <p>2 Q. Well, not unless there's a question 3 pending.</p> <p>4 So as far as saying that Ms. Glenn 5 received 100 percent sentence reduction, you're 6 basing that on the fact that she received 7 probation, you're saying her original charge was 8 not probationable. Is that fair to say?</p> <p>9 A. Her original charges, as I understand 10 them, were three Class X felonies, and they were 11 not probationable.</p> <p>12 Q. Okay.</p> <p>13 A. But these discounts, and as they are 14 discussed in the literature and talked about in 15 reforms that surround plea discounts, it's always 16 with the maximum -- the statutory maximum that the 17 person is at risk for. And this is why -- my 18 understanding is why the judge is -- in all the 19 plea hearings that I've observed will talk about 20 the maximum sentence that they could receive. And 21 that's what they should be telling defendants. Not 22 what they could receive.</p> <p>23 And I don't know what Ms. Glenn and 24 Mr. Baker were told, if anything, by the sentences</p> |
| Page 218 | Page 220 |
| <p>1 aggravation as well as factors in mitigation when 2 they impose a sentence?</p> <p>3 A. Yes, in general. I don't know the 4 specific states and -- I know in death penalty 5 cases that's often the case. I don't know for each 6 crime or each state, no.</p> <p>7 Q. Okay. Well, would you assume that -- 8 we'll just talk about Ms. Glenn for an example. 9 That if she had been -- if she had gone to trial 10 and was sentenced and the court was considering 11 factors in aggravation and mitigation, that one of 12 the factors that the court would have to consider 13 would be her criminal history?</p> <p>14 MS. KLEINHAUS: Objection to foundation.</p> <p>15 You can answer.</p> <p>16 BY THE WITNESS:</p> <p>17 A. Yes, I do know that criminal history is 18 taken into account in sentencing decisions.</p> <p>19 BY MS. EKL:</p> <p>20 Q. Okay. And would you agree with me that 21 a person with no criminal history is more likely to 22 receive a sentence at the lower end of the spectrum 23 than a person that has an extended criminal 24 history?</p> | <p>1 they could have received if they were convicted at 2 trial or anything like that. I'm just basing these 3 plea discounts on the statutory maximums that they 4 could have received.</p> <p>5 Q. Okay. Not the likelihood of what they 6 would have actually received?</p> <p>7 A. I don't know if they knew that. I don't 8 know if their defense attorney had an opinion about 9 that. I don't know anything about that, no. And 10 that's not what the plea discount discussion is 11 based on.</p> <p>12 Q. And you didn't review their defense 13 attorney's deposition transcript in this case, 14 correct?</p> <p>15 A. I didn't even know he was deposed, no.</p> <p>16 Q. And you didn't talk to him to find out 17 whether or not he advised them of anything during 18 the conference -- any private conference with them 19 before they pled guilty, correct?</p> <p>20 MS. KLEINHAUS: Objection to form.</p> <p>21 You can answer.</p> <p>22 BY THE WITNESS:</p> <p>23 A. No, I don't know.</p> <p>24 BY MS. EKL:</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: right;">Page 221</p> <p>1 Q. Do you know the basis for the idea that 2 someone who is facing a plea discount will plead 3 guilty -- is more likely to plead guilty than not 4 plead guilty? Can you let us know what the basis 5 for that is?</p> <p>6 MS. KLEINHAUS: Objection to form, vague, and 7 ambiguous.</p> <p>8 You can answer.</p> <p>9 BY THE WITNESS:</p> <p>10 A. It goes back to the bargaining in the 11 shadow of the trial calculation that defendants are 12 forecasting their likelihood of conviction at 13 trial, and, you know, there's, like, this rational 14 actor -- it's a rational actor theory that if 15 the -- probably a conviction, plus the sentence 16 that they would receive at trial was -- or by plea 17 is greater than or less than what they would 18 receive at trial, that's the calculation that in 19 theory defendants are making.</p> <p>20 BY MS. EKL:</p> <p>21 Q. And if someone like Ben Baker had a 22 criminal history where he was familiar with kind of 23 how sentencing hearings are conducted in terms of 24 what's considered by the judge, would you expect</p> | <p style="text-align: right;">Page 223</p> <p>1 discount that someone is going to be more -- guilty 2 or innocent is going to be more likely to take this 3 bargain or this plea agreement if they believe 4 they're going to get a better bargain or plea 5 agreement than what would happen at trial?</p> <p>6 MS. KLEINHAUS: Objection to form.</p> <p>7 BY THE WITNESS:</p> <p>8 A. It's contingent on their perceived 9 probability of conviction at trial. So it 10 depends -- like, if it's 90 percent, if it's 11 20 percent, if that affects the calculation and the 12 ratio of the plea sentence to the trial sentence -- 13 to the would-be trial conviction sentence.</p> <p>14 BY MS. EKL:</p> <p>15 Q. Can you point us to a single study that 16 talks about how a person's perceived belief about 17 what they'll receive if they go to trial should be 18 based on the maximum sentence that they could 19 receive without consideration of any other factors 20 of what they would actually receive?</p> <p>21 MS. KLEINHAUS: Objection to form.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I can -- yeah, I can point you to 24 several studies in laboratory.</p> |
| <p style="text-align: right;">Page 222</p> <p>1 that he would have shared that with Ms. Glenn, the 2 likelihood of her receiving a penitentiary sentence 3 versus a probationary sentence?</p> <p>4 MS. KLEINHAUS: Objection, calls for 5 speculation.</p> <p>6 You can answer.</p> <p>7 BY THE WITNESS:</p> <p>8 A. I don't -- I don't know how much they 9 talked. What I do know is that she was -- if she 10 went to trial, my understanding is that she would 11 have been facing three felony -- or Class X felony 12 charges, and they're not probationable.</p> <p>13 BY MS. EKL:</p> <p>14 Q. Is the theory that someone would be more 15 likely to take a plea based on their belief that 16 they are receiving a discount from what they are 17 likely to get sentenced to after a trial?</p> <p>18 MS. KLEINHAUS: Objection to form.</p> <p>19 You can answer.</p> <p>20 BY THE WITNESS:</p> <p>21 A. No. I'm not sure I understood your 22 question. Can you repeat the question?</p> <p>23 BY MS. EKL:</p> <p>24 Q. Sure. Is the concept behind the plea</p> | <p style="text-align: right;">Page 224</p> <p>1 BY MS. EKL:</p> <p>2 Q. Okay. Go ahead.</p> <p>3 A. So there was the work by Zottoli and her 4 colleagues that I just mentioned before. She -- 5 within that one publication, I think there are two 6 or three different studies that you could look at. 7 There was an earlier study that was by Schneider 8 and Zottoli that I think is relevant. I'd have to 9 check on that. And Bartlett and Zottoli that is 10 also relevant. They're all pretty recent studies.</p> <p>11 Q. And these were all studies that you said 12 were conducted in a lab. None of these related to 13 using subjects that were in a real-life setting, 14 correct?</p> <p>15 MS. KLEINHAUS: Objection to form.</p> <p>16 You can answer.</p> <p>17 BY THE WITNESS:</p> <p>18 A. So I've done some studies that have 19 examined the bargaining in the shadow of the trial 20 with actual defendants, but I don't know if they 21 were guilty or innocent, which is the conversation 22 I was having with Mr. Sullivan before. And that 23 was Bushway and Redlich, 2012. And then we did -- 24 we did another study with defense attorneys,</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| Page 225 | Page 227 |
|--|---|
| <p>1 prosecutors, and judges. And so we were asking 2 them -- we were -- not directly, but we were 3 looking at whether they were actually bargaining in 4 the shadow of their trial. It was a hypothetical 5 case. But that was Bushway, Redlich, and Norris, 6 2014.</p> <p>7 BY MS. EKL:</p> <p>8 Q. My question was specific to have studies 9 been conducted where the subject of the person, the 10 criminal defendant or somebody who was supposed to 11 represent the criminal defendant, and whether or 12 not that person in looking at the -- be motivated 13 to take the bargain was based on a real perception 14 of what they might get after trial versus the 15 maximum that was out there?</p> <p>16 MS. KLEINHAUS: Objection, asked and answered.</p> <p>17 Go ahead.</p> <p>18 BY THE WITNESS:</p> <p>19 A. The studies by Zottoli and colleagues 20 that I mentioned, yes.</p> <p>21 BY MS. EKL:</p> <p>22 Q. And when you say those are lab studies, 23 what do you mean by that? How were those conducted 24 in the lab?</p> | <p>1 BY MS. EKL: 2 Q. There's no study that shows that, 3 correct?</p> <p>4 MS. KLEINHAUS: Objection to form.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I'm not sure about as directly as you're 8 saying, but there are -- you know, I have 9 interviewed defendants about the reasons that they 10 took pleas, and I asked them -- I might have -- I 11 can't remember if I asked them about their 12 probability of conviction at trial. But, like, 13 very specific to their maximum sentences, no, I 14 can't think of any studies like that. But, again, 15 that is what the judge -- in every plea hearing 16 that I've observed, the judge will talk about what 17 they're at maximum risk for, as they should in my 18 opinion.</p> <p>19 BY MS. EKL:</p> <p>20 Q. They're required by law to tell the 21 criminal defendants both the minimum and the 22 maximum that they could be facing.</p> <p>23 But I'm trying to understand why you are 24 only using the maximum when you're trying to</p> |
| <p>1 A. Essentially, what I mean is that they're 2 not with actual defendants. They weren't really -- 3 and they were online studies with participants who 4 were completing surveys online. I believe -- I 5 believe they were community members. There might 6 have been one or two studies with college students, 7 but I think that most of them were community 8 members. But I did not prepare those studies. I 9 didn't look at them recently.</p> <p>10 Q. So, again, there's no study that you can 11 point us to -- I see Ms. Kleinhaus is laughing, but 12 I want to make sure that I get --</p> <p>13 A. I just mentioned several.</p> <p>14 Q. No, no, no. You didn't let me finish my 15 question.</p> <p>16 A. Okay.</p> <p>17 Q. There's no study that is actually 18 looking at a criminal defendant -- not a laboratory 19 survey that's conducted, but a criminal defendant's 20 perception in terms of the fact that they're 21 bargaining for what they think they will get after 22 trial versus what the maximum is that they can 23 possibly get in any scenario? There's no study --</p> <p>24 MS. KLEINHAUS: Objection. Sorry.</p> | <p>1 determine what the plea discount is. And you're 2 saying, and correct me if I'm wrong, that it's 3 based on these laboratory studies that were 4 conducted and just the theory in general in 5 relation to the plea discounts.</p> <p>6 A. No, I'm not saying it's based on the 7 studies that you asked me about. What I'm saying 8 is that this is what the person is -- that's the 9 maximum plea discount because that's the maximum 10 statutory sentence that they're at risk for. So if 11 I'm considering or anybody -- if a defendant is 12 considering whether to plead guilty or not, they're 13 thinking about, you know, the worst-case scenario. 14 What am I -- what could I possibly get, and should 15 I avoid that risk because that's really what we're 16 talking about, risk/benefit decisions, by pleading 17 guilty. Because the judge just told me if I'm 18 convicted at trial, I might get 90 years, or 19 30 years, or whatever it is.</p> <p>20 MS. EKL: Let's take a couple of minutes. We 21 may be wrapping up.</p> <p>22 MS. KLEINHAUS: Great.</p> <p>23 MS. EKL: Just want to make sure.</p> <p>24 THE WITNESS: Another break? Are there other</p> |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|--|
| <p style="text-align: center;">Page 229</p> <p>1 attorneys who are planning to ask me questions?</p> <p>2 MR. BAZAREK: I might have a couple follow-up,</p> <p>3 but not much.</p> <p>4 MS. EKL: If you want to go ahead, go ahead.</p> <p>5 That's fine. I'm good.</p> <p>6 MS. KLEINHAUS: Are there any attorneys who</p> <p>7 haven't already questioned Dr. Redlich who are</p> <p>8 going to? If so, please do so now. Otherwise,</p> <p>9 maybe Mr. Bazarek can wrap up.</p> <p>10 Okay. Seeing none, Bill, you're up.</p> <p>11 FURTHER EXAMINATION</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. Dr. Redlich, have you ever evaluated an</p> <p>14 individual who had a pending criminal matter as to</p> <p>15 whether or not they were competent -- strike that.</p> <p>16 Have you ever been asked to evaluate an</p> <p>17 individual who had a pending criminal court</p> <p>18 proceeding as to whether or not that individual was</p> <p>19 competent to stand trial?</p> <p>20 A. No.</p> <p>21 Q. Have you ever evaluated an individual</p> <p>22 who had a pending criminal court proceeding as to</p> <p>23 whether or not that individual was competent to</p> <p>24 plead guilty?</p> | <p style="text-align: center;">Page 231</p> <p>1 BY MR. BAZAREK:</p> <p>2 Q. And have you ever heard that phrase</p> <p>3 reasonable degree of scientific certainty? Have</p> <p>4 you ever heard that?</p> <p>5 A. Yes.</p> <p>6 Q. What does that mean, reasonable degree</p> <p>7 of scientific certainty?</p> <p>8 A. In the context that I've heard it in is</p> <p>9 in the forensic sciences.</p> <p>10 Q. In your work as a scientist, do you use</p> <p>11 that phrase?</p> <p>12 A. No.</p> <p>13 Q. And why is that?</p> <p>14 A. Because it's not really a research</p> <p>15 phrase. It's more of a legal phrase, I would say.</p> <p>16 And I don't know if -- I don't think that other</p> <p>17 social scientists use that phrase, to my knowledge.</p> <p>18 Again, it's like, a forensic scientist who's</p> <p>19 talking about hair analysis, or tire treads, or</p> <p>20 something like that. I don't know.</p> <p>21 Q. Right. And you would agree there's</p> <p>22 nowhere in your report is there any opinions that</p> <p>23 you hold to a reasonable degree of scientific</p> <p>24 certainty, correct?</p> |
| <p style="text-align: center;">Page 230</p> <p>1 A. No. That's a clinical forensic</p> <p>2 psychologist, which I'm not trained to do.</p> <p>3 Q. Okay. And so then you would agree</p> <p>4 you've never been asked or evaluated anyone who is</p> <p>5 going to plead guilty as to whether or not they</p> <p>6 were making a knowing decision, an intelligent</p> <p>7 decision, and a voluntary decision, is that</p> <p>8 correct?</p> <p>9 A. That's correct.</p> <p>10 MS. KLEINHAUS: You mean before they plead?</p> <p>11 BY MR. BAZAREK:</p> <p>12 Q. Before they plead, correct.</p> <p>13 A. Correct.</p> <p>14 Q. You're a scientist, right? You</p> <p>15 testified to that.</p> <p>16 A. Yes.</p> <p>17 Q. Okay. When did you first become a</p> <p>18 scientist?</p> <p>19 MS. KLEINHAUS: Objection, asked and answered.</p> <p>20 Answer again.</p> <p>21 BY THE WITNESS:</p> <p>22 A. If it's -- if it's at the point of my</p> <p>23 Ph.D., I received my Ph.D. in 1999.</p> <p>24</p> | <p style="text-align: center;">Page 232</p> <p>1 A. I don't know. I never thought about</p> <p>2 that. I don't say that, yeah.</p> <p>3 Q. Right. Right. Okay. And I had a</p> <p>4 question going back to your report.</p> <p>5 A. Okay.</p> <p>6 Q. Give me a second.</p> <p>7 So I see, if you go to Page -- on</p> <p>8 Page 13 of your declaration, under penalty of</p> <p>9 perjury, it was executed on March 19, 2024. That's</p> <p>10 on Page 13 if you need the page.</p> <p>11 A. Yes.</p> <p>12 Q. Did I read that right, March 19, 2024,</p> <p>13 that's where you declared under penalty of perjury</p> <p>14 the foregoing is true and correct?</p> <p>15 A. Right.</p> <p>16 Q. My only question is in the letter -- if</p> <p>17 you go to the first page, the letter to your friend</p> <p>18 Joshua Tepfer, J.D., Scott Rauscher, J.D., Theresa</p> <p>19 Kleinhaus, J.D., it's March 27, 2024.</p> <p>20 So did something change from the time</p> <p>21 you made your declaration until March 27, 2024?</p> <p>22 MS. KLEINHAUS: I'm just going to object to</p> <p>23 the extent this gets into any drafts which are</p> <p>24 protected under Rule 26 that you not describe</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

| | |
|--|---|
| <p style="text-align: center;">Page 233</p> <p>1 anything with regard to drafts. 2 If you're able to answer the question 3 without describing or discussing drafts, then go 4 ahead. 5 BY THE WITNESS: 6 A. I don't know. It was a draft. I don't 7 know how to answer that question. I can 8 certainly -- yeah. 9 BY MR. BAZAREK: 10 Q. Yeah. I'm just trying to make heads or 11 tails out of it. You do the declaration on 12 March 19, but then the letter is dated March 27. 13 A. Yeah. 14 Q. Can you explain that? 15 MS. KLEINHAUS: Again, I'll direct her not to 16 answer because I think it invades information 17 that's protected by Rule 26. 18 BY MR. BAZAREK: 19 Q. Is that right, Doctor? Is that 20 information protected by Rule 26? 21 MS. KLEINHAUS: I think the question is, is 22 she going to take my advice and not answer the 23 question. 24</p> | <p style="text-align: center;">Page 235</p> <p>1 of perjury on March -- 2 A. 19th, 2024. No, I do not hold any other 3 opinions. 4 MR. BAZAREK: Okay. Thank you, Dr. Redlich. 5 MS. KLEINHAUS: Are we through? Okay. 6 MR. BAZAREK: I don't have anything more. 7 MS. KLEINHAUS: Okay. Dr. Redlich, you have 8 an opportunity to either waive your signature or 9 reserve it. Waiving means that you're not going to 10 go through and review the question and answer, and 11 reserving it means you'd like to take a look at the 12 transcript before it's finalized to make sure that 13 the court reporter took down everything correctly. 14 You can't change any of your substantive answers. 15 It's just a matter of whether there are any issues 16 understanding what was said. 17 Would you like to waive your signature 18 or reserve your signature? 19 THE WITNESS: Am I allowed to ask what's 20 commonly done here? 21 MS. KLEINHAUS: I guess my suggestion would be 22 that you waive and that you don't need to go 23 through it since we have it recorded on Zoom. 24 THE WITNESS: Okay. Fine. I will waive my</p> |
| <p style="text-align: center;">Page 234</p> <p>1 BY MR. BAZAREK: 2 Q. Dr. Redlich, but for Ms. Kleinhaus 3 directing you not to answer the question, could you 4 answer the question? 5 A. I'm not sure what that means. What are 6 you asking? Could I answer? 7 Q. Well, I was asking for an explanation 8 between the inconsistency of your declaration and 9 the date of your final report. 10 MS. KLEINHAUS: I'm directing her not to 11 answer that because it's information that's 12 protected under Rule 26. 13 BY MR. BAZAREK: 14 Q. Okay. So my question, though, is, 15 Dr. Redlich, but for Ms. Kleinhaus instructing you 16 not to answer, would you be able to answer my 17 question? 18 MS. KLEINHAUS: I think that gets at the same 19 thing. So I'm going to direct her not to answer 20 that. 21 BY MR. BAZAREK: 22 Q. Do you hold any other opinions in this 23 case that are not included in your March 27, 2024 24 report that you declared was truthful under penalty</p> | <p style="text-align: center;">Page 236</p> <p>1 signature. 2 MS. KLEINHAUS: Okay. We can go off the 3 record. 4 THE VIDEOGRAPHER: This is the end of the 5 deposition. The time is 3:41 p.m. And the run 6 time on this is 5 hours, 11 minutes, and 7 20 seconds. 8 THE COURT REPORTER: Are you ordering the 9 transcript? 10 MR. BAZAREK: Yeah. I'm ordering it, yes, 11 yes. We'll talk about it. 12 THE COURT REPORTER: Does anybody need a copy? 13 MS. EKL: No. 14 MR. SULLIVAN: Not right now. 15 (The deposition concluded at 3:42 p.m.) 16 17 18 19 20 21 22 23 24</p> |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 237

1 I, KAREN A. FAZIO, CSR No. 84-1834, a
2 Notary Public within and for the County of Cook,
3 State of Illinois, and a Certified Shorthand
4 Reporter of said state, do hereby certify:

5

6 That previous to the commencement of the
7 examination of the witness, the witness was duly
8 sworn to testify the whole truth concerning the
9 matters herein;

10

11 That the foregoing deposition transcript
12 was reported stenographically by me, was thereafter
13 reduced to typewriting under my personal direction
14 and constitutes a true record of the testimony
15 given and the proceedings had;

16

17 That the said deposition was taken
18 before me on the date and time specified;

19

20 That I am not a relative or employee or
21 attorney or counsel, nor a relative or employee of
22 such attorney or counsel for any of the parties
23 hereto, nor interested directly or indirectly in
24 the outcome of this action.

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 238

1 IN WITNESS WHEREOF, I do hereunto set my
2 hand of office at Chicago, Illinois, this 2nd day
3 of May, 2024.

4

5

6

7

8

9

10 KAREN A. FAZIO, CSR No. 84-1834

11 Notary Public, Cook County, Illinois.

12 My commission expires 5/10/24

13

14

15

16

17

18

19

20

21

22

23

24



Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 239

| A | actions | age | Aleeza | 9:16 10:9 11:5 |
|-------------------------|-------------------------|--------------------------------|-------------------------|----------------|
| a.m 1:20 5:15 | 69:1 158:15 | 28:13 73:11 ages 17:21 18:7 | allegations | 11:8,9 12:9 |
| 35:8,11 62:16 | actor 221:14,14 | aggravation | 164:17 | 23:24 29:10 |
| 83:10,14 | actual 22:17 | 218:1,11 | allege 151:14 | 37:7 38:4,5,15 |
| Aberdeen 2:2 | 43:24 44:9,10 | aggregate 37:10 | alleged 69:22 | 39:14 40:8,24 |
| ability 7:15 | 197:1,23 | ago 13:6 18:4 | 124:10 149:11 | 41:6,19,21 |
| 84:15 87:20 | 224:20 226:2 | 86:5 108:3,4 | 149:13,14 | 42:2,13 45:24 |
| able 23:17 28:17 | 190:2 217:8 | 134:13 135:4 | 150:16 151:1,9 | 47:3,16 48:9 |
| 76:9 104:16 | adding 216:6 | 162:19 174:13 | 151:21 152:18 | 49:3,15 50:4 |
| 160:20 165:19 | additional 210:4 | 188:19 | 158:15 | 50:14 52:7,15 |
| 196:16 204:9 | 213:4 214:2 | agree 29:7 38:23 | alleging 151:11 | 53:19 54:6 |
| 204:18 233:2 | 39:7 46:4 | 39:7 46:4 | 153:1 | 55:11,13,21 |
| 234:16 | address 5:4 | 48:22 75:1,5 | Allison 1:11 4:2 | 57:15,17 58:20 |
| absolutely 88:18 | 189:22 | 76:1 85:16 | 5:10 6:18 | 59:4,13,19 |
| 88:18 191:12 | adequate 75:15 | 118:19,24 | allow 113:14 | 60:12 61:15 |
| accept 117:13 | adequately | 151:16 156:10 | 153:10 155:2 | 64:7 65:10,24 |
| 121:14 157:1,3 | 74:22 81:17 | 158:21 175:20 | 158:18 199:23 | 66:11,18 67:19 |
| 157:22 187:14 | administer | 181:8,12 | 200:14 | 69:15 72:16 |
| acceptable | 82:16,18 | 190:22 191:1 | allowed 30:12 | 75:9,11 76:6 |
| 189:11 | administered | 194:2 210:23 | 68:18 131:4,17 | 76:10 77:16 |
| accepted 121:12 | 36:3,20 | 211:6,7 214:12 | 235:19 | 78:8 80:10 |
| 121:16 | admissible | 214:18 215:16 | ALT 18:12,15 | 81:8 84:12 |
| accepting 73:20 | 195:21 | 218:20 230:3 | 18:18 19:11 | 85:23 87:6 |
| accepts 208:1 | admit 158:13,14 | 231:21 | Alvin 7:20,22 | 88:10 90:6,8 |
| access 53:3 | admitted 47:21 | agreed 117:12 | 8:13 58:22 | 90:10 91:20 |
| 72:21,22 | adolescents 18:7 | 211:13 | 150:17 | 101:12 103:2 |
| 148:11,14 | 19:6,7,13,20 | agreement | ambiguous | 105:7,22 106:9 |
| accomplish | 20:4 | 29:22 155:15 | 221:7 | 107:18 113:7 |
| 30:18 | adult 21:23 28:9 | 192:4 223:3,5 | American | 113:16,22 |
| account 58:22 | 169:12 | agreements | 117:19 155:21 | 120:22 126:3 |
| 151:15 152:1 | adults 17:22 | 116:18 | 161:7 | 130:17 131:4,7 |
| 152:15,18 | 18:6 19:9 | ahead 11:10 | amicus 155:20 | 131:13 132:8 |
| 207:15 209:16 | 81:16 | 24:17 51:7 | amount 10:17 | 136:4 137:8 |
| 209:17,20 | advertise 129:15 | 52:11 56:1 | 74:6,17,24 | 138:6,18 139:6 |
| 218:18 | advice 233:22 | 58:6 128:2 | 90:19 210:24 | 141:20 142:11 |
| accounts 50:20 | advised 220:17 | 130:18 131:18 | 217:15 | 147:6,21 148:5 |
| 139:14 | advisory 189:19 | 143:10 144:1 | amounts 70:12 | 148:6,21 160:1 |
| accused 18:15 | affect 60:8 91:8 | 151:6 152:5,21 | analysis 48:13 | 168:18 170:24 |
| acquaintance | 195:9 | 164:18 169:22 | 50:5,18 54:16 | 173:4 179:24 |
| 132:22 | affidavit 150:9 | 204:2 205:9 | 68:20 119:6,7 | 184:8,23 185:4 |
| acquitted | 150:10,12 | 209:11 224:2 | 144:7 157:19 | 185:8 186:2,14 |
| 194:18 | 164:1 | 225:17 227:5 | 173:15 196:6 | 191:6 193:4,16 |
| act 74:20 | affidavits 178:3 | 229:4,4 233:4 | 231:19 | 200:19 201:6 |
| action 237:24 | 212:24 | al 1:8 5:10,11 | analyzed 114:19 | 203:12,16 |
| | | 25:20,23 26:2 | answer 8:1,3 9:8 | 205:21 207:5 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 240

| | | | | |
|------------------------|-------------------------|------------------------|------------------------|------------------------|
| 208:8,19 | apparent 9:11 | 144:15 145:9 | 147:19 148:20 | 201:2 206:16 |
| 210:19 211:17 | 9:14 | 147:20 168:17 | 157:4 170:3,22 | 207:15 208:3 |
| 214:16 217:18 | APPEARANCE | 180:12 | 177:14 198:12 | 210:21 211:2 |
| 217:21 218:15 | 2:1 | arrest 8:9 39:2 | 203:11 204:16 | assessments |
| 220:21 221:8 | appeared 2:5,10 | 42:5 47:24 | 210:4 225:16 | 7:14,17 35:24 |
| 222:6,19 | 2:15,20 3:5,10 | 58:23,23 168:3 | 227:10,11 | 69:8 139:20 |
| 224:16 230:20 | 63:3,10 | 168:10 170:20 | 228:7 229:16 | 140:18 211:6 |
| 233:2,7,16,22 | appearing 5:22 | 171:20 172:9 | 230:4,19 | assign 204:4 |
| 234:3,4,6,11 | appendix 8:11 | 172:14 | asking 12:13 | assistant 16:24 |
| 234:16,16,19 | 48:1 51:17 | arrested 143:19 | 14:23 22:3 | 111:8 |
| 235:10 | 60:6 64:22 | 172:23 | 23:9 28:4 | assistantship |
| answered 15:14 | 71:13 135:14 | arrests 37:17 | 32:10 44:10 | 110:22,23 |
| 39:13 40:23 | 136:9,10 147:9 | 38:13 39:10 | 45:12 56:18,19 | assisting 110:5 |
| 41:10,16 45:23 | 177:9 178:9,10 | 45:9 47:1 | 59:7,8 60:10 | Association |
| 46:10 52:6 | 178:17,23,24 | 149:5 168:22 | 60:11 61:20 | 117:19 155:21 |
| 54:23 55:4 | 179:10,22 | 169:11 170:4,7 | 67:5 68:5 | 161:7 |
| 56:6 58:4 | applicable 5:8 | article 20:10 | 75:16 77:23 | assume 9:7 59:7 |
| 59:18 66:17 | 118:2 201:24 | 24:6 25:13,17 | 83:1 88:5,20 | 59:8 63:4 |
| 72:24 88:12 | 202:16 203:9 | 25:21 27:20,21 | 88:22 90:19 | 72:19 88:5 |
| 91:18 105:6 | applies 163:22 | 121:5,9 122:22 | 93:4,5,11 | 217:3 218:7 |
| 106:8 113:6,21 | apply 118:6 | 123:3 | 98:18 102:4,14 | assumed 215:3 |
| 138:17 142:10 | 163:20 | articles 122:20 | 103:19,22 | assuming |
| 147:5,20,23 | appreciate | as-is 121:12 | 104:1 105:11 | 217:12 |
| 148:20 157:4,5 | 165:14 | asked 12:11 | 105:14,16,19 | assumption |
| 170:23 175:14 | appreciates | 13:2 18:20 | 106:11 108:9 | 70:13 |
| 180:22 203:11 | 136:15 | 29:12 30:17 | 116:4 118:11 | assumptions |
| 225:16 230:19 | appreciation | 31:1 32:14 | 125:10 128:11 | 136:2,13 |
| answering 56:19 | 70:16 | 33:14 38:9 | 128:14 131:10 | attempted 68:13 |
| 57:19 64:9 | approach 50:17 | 39:12 40:22 | 136:1 141:11 | 173:13 |
| 75:20 80:18 | appropriate | 41:7 42:6,15 | 147:15 150:24 | attend 22:13,15 |
| answers 9:22 | 39:5 40:12,12 | 44:1 45:23 | 159:10 168:9 | 22:23 27:8 |
| 32:15 79:22 | approved 44:23 | 46:10 49:17 | 170:19 174:15 | attended 22:7 |
| 80:14,16,21 | approximately | 50:3,5 51:16 | 188:20 190:4 | 22:11,21 23:6 |
| 83:2 141:12,16 | 22:23 25:6 | 51:20 52:5 | 197:14 198:11 | 25:6,12 |
| 142:8,15,21 | 28:17 | 58:3 59:6,18 | 225:1 234:6,7 | attorney 30:1,2 |
| 144:11 191:19 | April 1:20 5:14 | 66:17 75:24 | asks 116:6 | 38:9 63:6,18 |
| 206:19 235:14 | 174:2 | 76:17,23 91:18 | aspect 188:12 | 113:15 114:14 |
| anybody 74:16 | area 23:22 53:21 | 101:15 104:3,4 | assess 74:23 | 220:8 237:21 |
| 74:21 117:2 | 182:10 188:3 | 104:12,15,23 | 75:13 77:2,7 | 237:22 |
| 144:18 228:11 | argumentative | 105:5 106:7 | 187:20 | attorney's |
| 236:12 | 7:24 38:3 41:9 | 113:6,21 115:9 | assessing 189:2 | 220:13 |
| anybody's | 41:18 48:8 | 116:24 117:6 | 189:10 | attorneys 5:19 |
| 133:23 | 53:9 55:16 | 123:13 127:13 | assessment | 15:22 30:16 |
| apologize 160:4 | 61:14 64:6 | 128:20 138:17 | 140:5 188:18 | 39:18 46:14 |
| 191:18 201:20 | 66:10 78:7 | 142:8,10 147:5 | 193:12 194:19 | 51:21 61:12 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 241

| | | | | |
|------------------------|-----------------------|------------------------|------------------------|------------------------|
| 114:15 120:6 | 146:5,9 149:9 | 164:9 169:11 | base 129:12 | 62:11,14,19 |
| 129:6 130:16 | 166:13 169:17 | 172:10,18,23 | based 50:19 | 64:14 66:14 |
| 131:8 134:4 | 179:5 212:12 | 173:13 178:19 | 64:11 71:22 | 67:1 70:4,22 |
| 136:2 190:4 | 217:7,17 | 179:6 182:12 | 73:3 75:23 | 73:5 77:20 |
| 211:4 224:24 | 221:10 232:4 | 183:19 185:24 | 141:7 175:21 | 78:16 79:14,16 |
| 229:1,6 | background | 186:22 187:20 | 185:13 196:18 | 83:8,15 85:7 |
| August 20:19 | 167:1 | 188:11 191:15 | 204:19,20 | 86:7 87:11 |
| 26:6 | backwards | 195:16,19 | 206:18 207:7 | 88:19 90:9 |
| author 205:3 | 36:13,16,16 | 206:17,21 | 208:11,24 | 91:23 95:16 |
| authorities | bag 152:2 | 207:3 208:4,20 | 215:1 220:11 | 96:1,4,6 103:6 |
| 143:20 | bags 47:10 | 209:6 210:15 | 222:15 223:18 | 105:8 106:1,19 |
| authors 101:23 | Baker 1:4 5:10 | 211:12 213:8 | 225:13 228:3,6 | 113:18 114:3 |
| 121:10 | 7:1 10:6 37:16 | 213:12,20,21 | baseline 159:3 | 119:11,17 |
| automobile | 38:12,24 39:8 | 214:2 219:24 | basic 54:6 | 120:2,5,16 |
| 50:10 | 39:23 42:3,9 | 221:21 | basically 77:21 | 121:1 126:8 |
| available 77:14 | 45:2,7,19 46:6 | Baker's 47:23 | 80:22 | 130:21 131:9 |
| 77:19 78:14 | 46:24 47:12 | 49:22 69:1 | basing 219:6 | 131:21 132:20 |
| Avenue 2:7 | 48:4,5,18,23 | 72:6,8,19 | 220:2 | 135:15 136:11 |
| avoid 228:15 | 50:8 51:1,21 | 136:23 141:9 | basis 114:8 | 137:13 138:10 |
| avoiding 55:14 | 51:24 53:6 | 149:2 162:3 | 187:17 188:8 | 139:1,19 140:1 |
| aware 14:18 | 54:10 57:1,9 | 168:2,9,23 | 188:13 215:18 | 141:5 142:3,14 |
| 41:2 48:23 | 57:23 58:23 | 170:2,20 | 221:1,4 | 143:14 144:8 |
| 64:24 65:1 | 60:12 62:20 | 171:19 172:14 | Bates 171:17 | 144:22 145:15 |
| 141:15,17 | 63:16 65:13 | 177:13 182:23 | Bazarek 2:14 | 147:10,22 |
| 143:5,6,19 | 66:16 67:22 | 184:20 185:10 | 4:3 6:3,3,22,24 | 148:1 149:1 |
| 153:14 189:7 | 68:11 69:10 | 186:11 201:2 | 8:8 10:14 | 151:12 152:9 |
| 196:15,20 | 71:5,15 72:12 | 214:21 216:16 | 11:13,19 12:8 | 153:2 157:11 |
| 199:21 217:18 | 73:1 75:5 76:2 | Baker-Glenn | 13:22 15:12,20 | 160:3 163:2 |
| 217:22,23 | 83:18 85:17 | 154:12 174:14 | 16:18 17:2 | 166:7,15 167:3 |
| B | | 175:9,21 176:2 | 21:14 24:1,2 | 167:16,20 |
| B 3:9 4:8 49:12 | 88:6,23 115:18 | 176:8 | 26:11 29:15 | 169:8,16 |
| 54:3 | 118:2 119:2 | ballot 116:12 | 35:2,6,12 | 170:12 171:8 |
| back 11:13 | 123:8 128:12 | ballpark 34:20 | 37:12 38:10,22 | 171:19,23 |
| 13:24 14:24 | 135:21 137:2 | 43:12 44:13 | 39:22 40:9 | 172:1 173:17 |
| 20:10 26:12 | 137:15 138:15 | 121:22 122:8 | 41:5,11,15,19 | 173:21 175:6 |
| 35:6,10 36:12 | 139:3,16 | bar 117:19 | 42:1,19 46:3 | 175:19 176:13 |
| 41:11,19 52:11 | 140:12 141:15 | 161:7 190:12 | 46:17 47:11,22 | 179:18 180:7 |
| 54:22 57:22 | 142:8,15 143:5 | bargain 223:3,4 | 48:16 49:7,20 | 180:15 181:13 |
| 62:7 70:4 83:7 | 144:19 145:2 | 225:13 | 50:23 51:19 | 192:1 206:20 |
| 83:13,16 92:8 | 151:10,13 | bargaining | 52:8,17 53:10 | 229:2,9,12 |
| 96:2 97:9 | 153:6,15 | 161:8 195:5 | 53:22 54:22 | 230:11 231:1 |
| 101:3 103:10 | 154:22 158:1 | 196:9 197:16 | 55:12,17,22 | 233:9,18 234:1 |
| 109:10 120:8 | 159:23 160:18 | 221:10 224:19 | 56:9 57:21 | 234:13,21 |
| 120:14 125:4 | 160:21 161:11 | 225:3 226:21 | 58:12 59:11 | 235:4,6 236:10 |
| | 163:18,22 | Bartlett 224:9 | 60:3 61:19 | bear 62:4 162:4 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 242

| | | | | |
|-------------------------|--------------------|------------------------|-------------------------|-------------------------|
| 208:21 | 37:16 38:12,24 | best 9:24 18:5 | bullet 169:3 | capacity 7:17,18 |
| bears 140:23 | 39:8,19,23 | 202:24 | 214:3,7 217:1 | 36:4,5 |
| beauty 198:4 | 42:3,9 45:2,7 | better 164:11 | bunch 189:20 | car 47:9 50:8,21 |
| becoming 17:20 | 45:19 46:6,15 | 223:4 | BURNS 2:17 | 51:1,2 52:1,1 |
| began 34:6 | 46:24 47:5,12 | beyond 136:1 | Bushway 224:23 | 52:19 54:11,13 |
| begins 95:10 | 47:21,23 48:4 | 139:15 175:17 | 225:5 | 59:1 60:13 |
| behalf 2:5,10,15 | 48:5,18,23 | 192:12 201:16 | business 5:4 | 139:4 150:4 |
| 2:20 3:5,10 | 49:22 50:8 | 207:12 | busy 16:2 | carceral 213:18 |
| 5:16,22 126:10 | 51:1,21,24 | bias 136:17 | buy 160:20 | care 84:8 |
| 127:12,16,20 | 53:6 54:10 | biased 136:19 | <hr/> | career 43:10 |
| 128:17 | 57:9,22,23 | bigger 96:15 | C | 134:15 199:15 |
| Behavior 26:4 | 58:23 60:12 | bill 10:4,12,18 | calculated | cars 47:7 |
| 205:7 | 62:20 64:13,16 | 96:3 229:10 | 161:10 | case 5:11 7:20 |
| belief 222:15 | 66:16 67:22 | bit 27:3 99:22 | calculating | 8:14 10:7,24 |
| 223:16 | 69:1,10 71:5 | 165:10 167:2 | 213:11 | 12:2,19,19 |
| believability | 72:3,8,12 75:5 | 201:21 | calculation | 13:9,10,14,16 |
| 206:16 | 76:1,17 80:7 | blind 121:7 | 195:4 215:1 | 14:5,12,16,20 |
| believable | 80:23 83:18 | boards 23:2 | 221:11,18 | 15:1 38:5 39:6 |
| 140:13 | 87:12,23,24 | 44:24 | 223:11 | 40:1,21 42:10 |
| believe 9:12 | 88:6,23 118:2 | book 129:17 | California 24:10 | 48:19 50:6,11 |
| 10:3 14:4,22 | 119:2 123:7 | books 122:19 | 24:12 25:2 | 51:3,22 52:4 |
| 15:7,14,15 | 128:12 135:21 | bore 70:17 | 43:4 109:19 | 53:1 54:15 |
| 16:13 20:14 | 136:22 137:2 | Borkan 3:7,9 | call 24:6 102:19 | 55:6,8 56:14 |
| 21:3 25:22 | 137:15 138:15 | 6:2,2 | 130:1 134:20 | 56:17 57:12 |
| 26:23 27:11 | 139:3,3,10,13 | bottom 79:5 | 138:1 148:10 | 58:2 59:2 |
| 31:17 41:2,8 | 140:12 141:9 | 167:22 | 149:13 151:9 | 60:24 61:6,10 |
| 45:5 47:10,21 | 141:15 142:8 | Boulevard 2:13 | 174:12 188:16 | 61:22 62:2,7 |
| 48:1 55:4,10 | 142:15 143:5 | bounds 136:8 | called 1:12 6:19 | 64:24 65:5,23 |
| 56:13 61:24 | 144:19 145:2 | break 16:3 35:3 | 17:24 26:2 | 67:4,21 68:9 |
| 62:24 72:20 | 152:2,24 153:6 | 62:10 71:11 | 27:17 36:3 | 68:15,20,23,23 |
| 73:17 75:12 | 153:11,14 | 79:15 123:23 | 74:20 102:4 | 69:4,7 70:24 |
| 86:15,17 88:12 | 154:22 155:8 | 166:8 212:2,4 | 106:17 110:15 | 71:4,22 72:1 |
| 101:17 105:1 | 155:17 158:1 | 212:6 228:24 | 111:12 174:9 | 73:3,17 76:21 |
| 107:15 139:17 | 158:16 159:23 | breakdown | 175:9 | 84:17,22 85:5 |
| 144:12 153:17 | 163:16,18 | 34:15 | calling 175:23 | 86:8,17 87:2 |
| 155:19 189:23 | 164:2,5 169:11 | breaking 119:10 | calls 40:6 47:15 | 87:14,22,24 |
| 195:7 204:22 | 171:19 172:10 | brief 155:20 | 48:8 49:2,14 | 88:8,13,17 |
| 209:15 210:6 | 172:14,18,23 | briefly 33:2 | 53:18 57:14 | 90:4 94:5 |
| 217:8 223:3 | 177:13 179:6 | bring 171:11 | 58:4 85:21 | 112:4 115:18 |
| 226:4,5 | 182:23 183:19 | bringing 67:14 | 91:19 144:15 | 115:21 116:16 |
| believed 195:17 | 184:1 201:2 | broken 160:13 | 175:4 205:19 | 118:6,16 123:7 |
| 195:22 | 213:8,12 | brought 18:6 | 208:7 210:17 | 123:9,12 |
| believes 56:6 | 214:21 216:15 | 19:22 | 211:15 222:4 | 124:11 125:20 |
| BELL 3:1 | 221:21 | built 206:15 | Calvin 3:10 | 127:9 128:15 |
| Ben 1:4 7:1 10:6 | Ben's 48:12 | 207:2 | canteen 31:14 | 128:18,24 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 243

| | | | | | | | | |
|--------------|----------------|---------------------|---|--|---|--|---|--|
| 129:7,9,19 | 61:8 66:24 | Certificate | Chicago 1:8 2:3 2:8,13,18 3:3,8 5:5,11 6:8 137:18,24 137:20 138:15 | 17:11 19:18 22:6 25:3 43:13 56:12 176:6 clarifying 122:3 Clarissa 1:4 7:1 | | | | |
| 130:13,20 | 67:10,12,18,20 | Certificates | 138:3 139:21 140:19 | 10:7 37:16 38:12 39:1,8 39:19,23 42:4 42:9 45:3,7,19 46:6,15,24 48:15,22 49:5 49:8,10,21 50:8 51:1,21 51:24 54:10 57:10,23 58:24 | | | | |
| 131:14 132:6 | 88:1 89:21 | Certified | 140:23,24 | 60:13 62:20 63:16 64:13,15 66:16 67:22 71:6,8 72:3,12 73:21 75:6 76:2,17 80:8 80:23 83:18 90:2 118:2 119:2 123:8 128:12 135:21 136:23 137:2 137:15 138:16 139:3,10 140:12 152:1 153:1,11 154:22 155:2,7 156:23 163:19 164:6 179:7 183:3,19 184:1 213:8,12,17 Clarissa's 47:5 139:14 Clark 3:7 class 110:6,8 213:22 214:6,6 216:17,18,23 219:10 222:11 classes 86:20 clear 56:6 66:21 | | | | |
| 132:11 135:6 | 93:22 94:7 | Certified | 141:1 142:17 | 149:2 153:17 154:18 155:22 157:20 160:16 161:23 163:7 168:2,4,14,21 168:23 169:3,4 169:5 170:2,5 170:22 171:4 173:16,24 174:5,9,14 175:9,21 176:2 176:9,23 177:3 177:10,10,20 181:24 182:4 182:10 183:24 191:16 192:10 195:14 196:12 200:6 201:3 203:1,3 204:4 206:14,22 207:14,22 208:1,19 209:8 210:6,9,12,16 210:22,23,23 211:7,14 214:8 214:21 216:22 217:1,13 218:5 220:13 225:5 234:23 cases 8:16,21,22 10:22 11:2,5 11:22 12:13 13:3 28:6 33:19 34:4,4 37:23 53:16 | certify 237:4 chance 79:13 chances 91:14 126:24 127:3,4 127:13 129:1 130:10,12 132:18 136:23 138:20 139:15 148:12 149:5 162:10 164:21 166:6,18 168:3 168:22 169:1,3 170:4,8 175:5 184:11,14,15 186:6 189:1 201:14 202:6,6 202:9,20 208:15 218:5 cataloged 94:22 categories 115:3 115:8 category 115:7 caveat 136:4 Center 134:21 189:19,24 certain 71:3 81:11 95:21 96:13 171:5 173:18 177:24 178:15 192:8 217:19 certainly 44:19 81:21 109:9 233:8 certainty 15:4 186:16 231:3,7 231:24 | 157:24 195:7,8 195:9 196:18 195:17 196:2 197:6 change 50:11 51:3,9 52:3,21 54:14,18 57:11 58:1,9,14 59:2 59:13 60:14,15 60:17 87:14 88:7,24 89:13 90:4,11 142:16 143:2 211:5 232:20 235:14 characteristics 73:8 characterized 145:3 characterizes 47:19 charge 164:2 175:3 214:3,6 215:6,13 216:3 216:12,16 219:7 charged 125:24 126:10 143:6 149:24 charges 33:9,11 213:22 215:2 216:2 219:9 222:12 check 13:24 25:13 31:9 167:13 224:9 | 155:9 158:6 195:17 196:2 197:6 change 50:11 51:3,9 52:3,21 54:14,18 57:11 58:1,9,14 59:2 59:13 60:14,15 60:17 87:14 88:7,24 89:13 90:4,11 142:16 143:2 211:5 232:20 235:14 characteristics 73:8 characterized 145:3 characterizes 47:19 charge 164:2 175:3 214:3,6 215:6,13 216:3 216:12,16 219:7 charged 125:24 126:10 143:6 149:24 charges 33:9,11 213:22 215:2 216:2 219:9 222:12 check 13:24 25:13 31:9 167:13 224:9 | 17:11 19:18 22:6 25:3 43:13 56:12 176:6 clarifying 122:3 Clarissa 1:4 7:1 10:7 37:16 38:12 39:1,8 39:19,23 42:4 42:9 45:3,7,19 46:6,15,24 48:15,22 49:5 49:8,10,21 50:8 51:1,21 51:24 54:10 57:10,23 58:24 60:13 62:20 63:16 64:13,15 66:16 67:22 71:6,8 72:3,12 73:21 75:6 76:2,17 80:8 80:23 83:18 90:2 118:2 119:2 123:8 128:12 135:21 136:23 137:2 137:15 138:16 139:3,10 140:12 152:1 153:1,11 154:22 155:2,7 156:23 163:19 164:6 179:7 183:3,19 184:1 213:8,12,17 Clarissa's 47:5 139:14 Clark 3:7 class 110:6,8 213:22 214:6,6 216:17,18,23 219:10 222:11 classes 86:20 clear 56:6 66:21 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 244

| | | | | |
|--|--|--|---|--|
| 67:16 116:14 146:14 155:1 181:21 clearly 12:11 155:12 159:1 clients 38:1 64:1 64:11 clinical 7:18 36:5 230:1 clinician 7:10 close 28:9 99:23 cloth 181:11 coded 33:17 coding 22:12 27:19 114:24 coerced 57:7 182:14 coercion 82:13 116:17 117:21 119:8 coercive 117:16 117:16 155:18 155:20 161:4 coerciveness 155:23,23 156:7,19 cognitive 7:15 35:23 36:22 71:16 72:13 73:2,10 collateral 114:12 115:5 colleague 27:7 109:18 colleagues 95:13 109:13 205:7 224:4 225:19 collect 19:16 collected 22:3 25:4 109:10 collection 121:24 college 18:6,24 19:6,13,21 20:4 226:6 | colloquies 114:22 190:9 216:1 colloquy 33:12 75:23 81:15 85:1 115:1 187:11 188:19 189:18 190:5 combined 216:21 combo 92:7 124:12,13,17 come 30:12 35:6 46:16 80:13 120:8 181:21 186:6 comes 38:20 88:15 214:9 comfortable 60:18,19 61:13 61:17 coming 94:5 164:16 commencement 237:6 commencing 1:20 commentary 55:16 comments 121:11,11,14 commission 238:12 commit 70:9 103:16 104:14 104:19,24 105:21 committed 69:13,18,19 82:23 committee 17:18 common 34:24 74:21 94:8 162:10 163:7 | 164:21 166:17 166:23 184:14 208:22 235:20 commonly 133:14 communicate 131:8 communicatio... 31:15 226:5,7 comparative 204:10,18 comparatively 204:17 compared 93:22 94:3 196:11 208:14 comparing 17:21 comparison 166:21 comparisons 202:4 compensated 10:1 competent 36:21 229:15 229:19,23 complete 114:11 completed 20:16 completing 226:4 complex 149:3,4 149:6 168:2 177:3 complicated 60:11 168:21 169:4,5 170:3 170:10 171:4 compound 81:7 208:7 comprehended 85:18 | comprehension 36:19 77:3,8 79:20 82:1 84:15 99:17 103:23 computer 18:9 18:13,14,14,21 19:9 computers 83:5 conceded 60:15 concept 222:24 concerning 237:8 concluded 211:11 236:15 concludes 9:19 conclusion 186:7 206:16 conclusions 205:14 206:18 207:1 210:7 concurrent 215:4,5 concurrently 214:24 conduct 17:16 23:17 28:24 29:3 conducted 23:22 29:1 80:12 221:23 224:12 225:9,23 226:19 228:4 conducting 190:9 conference 133:1,2,3,4 134:19,20,23 134:24 220:18 220:18 conferences 132:15 confession 8:21 8:22 11:22 17:24 19:1 | 67:10,12 124:10,17 126:13 127:3 140:24 confessions 24:21 102:7 123:21,22 124:8,15 125:4 132:2 210:10 confidential 23:1 confidentiality 23:5,19,23 confirm 96:18 conflicting 50:20 139:9 confused 12:12 12:12 92:12 175:7 confusing 92:7 169:24 consecutive 214:24 215:3 consecutively 215:19 216:6 consent 30:20 consequences 114:12 115:6 187:22 consider 45:7 52:2 67:23 68:1 69:3 74:15 129:19 152:14 217:5 217:19,24 218:12 consideration 223:19 considered 45:10 199:11 221:24 considering 218:10 228:11 228:12 consistent 61:7 |
|--|--|--|---|--|

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 245

| | | | | |
|-------------------------|-------------------------|-------------------------|-----------------------|-------------------------|
| 80:14 87:24 | convicted 68:7 | 71:9 82:24 | couple 121:17 | 22:11 24:9 |
| 89:18,20 | 69:21 93:24 | 86:10 95:6 | 228:20 229:2 | 25:2,2 70:13 |
| 184:13 186:5 | 94:1,2,12 98:2 | 100:15 101:4,9 | course 35:22 | 107:5 155:19 |
| 198:23 | 98:10,17 137:3 | 109:8 127:9,18 | 119:11,12 | 188:18 189:3,9 |
| consistently | 137:16,21,22 | 136:14 137:20 | 157:7 164:5 | 189:20 190:1 |
| 159:21 198:21 | 138:13,15,16 | 145:21 147:12 | court 1:1 5:12 | cover 27:8 |
| constitutes | 138:22,24 | 150:13 151:16 | 6:11,13 11:14 | covered 191:18 |
| 237:14 | 158:2 163:17 | 154:18 161:23 | 13:21 14:9 | COVID 107:18 |
| constitutional | 163:24 164:3 | 166:18 176:16 | 15:8 21:19,19 | crafted 77:24 |
| 191:10 | 164:14 172:9 | 176:17 177:24 | 21:22 22:7,10 | 79:4 83:20 |
| consultation | 179:8 191:3 | 182:13 183:16 | 22:10 23:6 | crash 18:14 |
| 123:11 | 208:16 220:1 | 184:6 188:3 | 24:8,10,13 | crashed 83:6 |
| consulting 11:21 | 228:18 | 192:8,9 193:14 | 25:6,11 26:3,7 | crashes 18:15 |
| 12:5 13:17,18 | conviction 94:11 | 194:9 197:9 | 26:14,16,20 | crashing 18:21 |
| 67:9 | 100:1 125:18 | 199:13 200:4 | 27:8,23 28:8 | 19:8 |
| contact 31:3,3 | 153:19 164:22 | 200:10,12 | 33:6,10 42:24 | created 104:21 |
| contacted 131:2 | 173:7,13 195:8 | 203:10,20 | 55:24 57:3 | credibility |
| 131:3,14,16,23 | 195:18,20,23 | 215:9 216:20 | 139:20 140:3,5 | 139:20 140:3,5 |
| 135:5 174:21 | 196:18 197:6 | 217:13 220:14 | 140:18 158:10 | 140:18 158:10 |
| 175:8,15 176:1 | 199:3 206:7 | 220:19 224:14 | 195:22 | 195:22 |
| 176:7 | 208:15 221:12 | 227:3 228:2 | credible 153:6 | 210:14 211:12 |
| contacting | 221:15 223:9 | 230:8,9,12,13 | 210:14 211:12 | credit 206:21 |
| 175:20 | 223:13 227:12 | 231:24 232:14 | 208:4 209:15 | 208:4 209:15 |
| contains 95:18 | convictions | correctly 69:1 | 127:17,24 | creditable |
| contents 174:17 | 68:11 94:9 | 96:11 103:5 | 128:5,9 138:22 | 210:15 |
| 175:12 176:4,4 | 100:24 101:1 | 104:23 109:6 | 138:23 141:17 | credited 140:3 |
| contested 8:20 | 134:21 162:11 | 183:11 185:8 | 153:4 155:22 | 209:5 |
| 11:22 67:9,12 | 166:22 169:13 | 235:13 | 166:24 167:5 | crediting 139:13 |
| context 183:14 | 170:21 172:18 | correlations | 167:10,14,18 | 141:3 149:18 |
| 231:8 | 202:8 | 70:17,18 | 188:19 190:10 | 207:3 |
| contingent | Cook 1:18 107:5 | cost 160:20 | 193:15 217:5 | crime 18:1 |
| 73:19 223:8 | 107:14 237:2 | cost/benefit | 218:10,12 | 28:23 43:11 |
| Continued 3:1 | 238:11 | 193:2 | 229:17,22 | 44:6,8,9 75:2 |
| contradiction | Coordinated 2:5 | counsel 62:23 | 235:13 236:8 | 87:10 94:10,12 |
| 170:15 | 2:10,20 | 74:13 237:21 | 236:12 | 97:13 103:10 |
| controlled | cops 140:13 | 237:22 | courthouse | 103:15 104:5 |
| 216:24 | copy 236:12 | count 122:24,24 | 22:22 23:18 | 104:13,18,24 |
| conversation | correct 12:19,21 | 164:23 166:5 | 28:5 | 105:18,20 |
| 81:22 128:23 | 12:24 15:17,23 | 214:6 | courthouses | 106:5,12 108:8 |
| 133:8 174:18 | 16:9 25:8 34:5 | 213:24 | 22:22 | 120:19 126:1 |
| 224:21 | 37:4 39:11 | county 1:18 24:3 | courtroom 27:2 | 126:11 162:11 |
| conversations | 42:5 44:11 | 30:11,22 31:21 | 27:9,15 109:10 | 164:22 166:6 |
| 130:16 131:11 | 46:21 47:13 | 107:6,14 237:2 | courtrooms | 202:6 218:6 |
| 133:9 153:9 | 57:4 58:2 | 238:11 | 27:1,11,16 | crimes 25:7 |
| 175:12 | 62:23 65:23 | | | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 246

| | | | | |
|--------------------------|-------------------------|-------------------------|------------------------|-------------------------|
| 33:22 34:22 | currently | 163:10 166:2 | 63:3,11 73:9 | 224:24 |
| 44:20 45:20 | 112:23 | 167:14 | 112:5,16 114:5 | deficient 189:11 |
| 46:7 62:21 | custody 31:12 | dealer 7:22 8:6 | 115:23 127:8 | define 81:13,17 |
| 68:3,7,14 | 31:17 32:6,6 | 47:13,19 48:6 | 164:5 188:20 | 81:19 82:9 |
| 69:12,17,18,21 | CV 95:18 122:6 | 48:18,24 49:12 | 189:15 190:19 | 84:15 93:6 |
| 70:9 104:15 | 122:9,11,14,17 | 53:7 | 190:22 191:24 | definition |
| 105:11 106:11 | 134:16 | dealers 54:2 | 192:3,7,23 | 116:14 |
| 106:13 107:2,6 | CV-8940 1:7 | deals 118:12 | 193:10,24 | definitions |
| 118:20,22 | <hr/> | dealt 47:20 | 194:20 195:4 | 189:17 |
| 143:6 | D | 155:22 | 196:22,23 | definitive 80:10 |
| criminal 21:19 | D 1:12 4:1,2 | death 218:4 | 198:16,17 | 80:16,21 |
| 21:22 22:7,10 | 6:18 | December 26:8 | 202:17 203:18 | 194:13 |
| 24:8,13 26:3 | D-E-Z-E-M-B... | 26:9 37:18 | 225:10,11 | definitively |
| 26:20 27:23 | 26:10 | 38:13 39:1,9 | 226:18 228:11 | 87:17 |
| 33:6 34:24 | data 19:16 22:4 | 45:8 47:1 50:9 | defendant's | 231:3,6 |
| 48:12 68:6,18 | 23:8 25:4 | 57:24 139:4 | 194:8 226:19 | 231:23 |
| 107:13,17,24 | 32:23 33:6 | 151:23 176:16 | defendants 1:9 | degrees 197:12 |
| 108:7,13,23 | 94:23 100:19 | 176:20 | 2:16,21 6:4 | demonstrate |
| 112:3 123:19 | 109:11 121:23 | decide 89:11 | 21:20,23 28:10 | 77:9 80:3,6 |
| 125:13,17 | 122:4 135:10 | 201:16 | 43:24 44:10,15 | 160:18 |
| 126:14,17,20 | 135:19 201:1 | decided 155:1 | 60:1 63:6,12 | demonstrated |
| 126:24 127:8,9 | date 5:14 10:5 | decision 74:7,18 | 66:2 76:14 | 70:12 76:13 |
| 127:13,17,24 | 10:11 234:9 | 114:7 116:7,12 | 77:6,9 80:5 | 81:11 |
| 128:5,9 129:2 | 237:18 | 117:12,16 | demonstrates | 77:5 |
| 168:4 169:10 | dated 171:21 | 153:13 193:1 | 19:10 112:18 | |
| 170:9,20 171:2 | 174:2 233:12 | 211:1 230:6,7 | 197:4 | |
| 189:1 218:13 | dates 175:16 | 230:7 | demonstrating | |
| 218:17,21,23 | day 1:19 19:19 | decision-maki... | 19:10 112:18 | |
| 221:22 225:10 | 26:17,21 30:7 | 128:4,8,15,18 | 197:4 | |
| 225:11 226:18 | 57:11 68:22 | 197:22 | denied 164:15 | |
| 226:19 227:21 | 74:10,12 | decisions 102:20 | denominator | |
| 229:14,17,22 | 119:23 130:11 | 115:24 153:9 | 114:1 | |
| criteria 100:2,10 | 177:6 204:15 | 184:13 218:18 | dep 120:6 | |
| criticism 188:16 | 209:14 213:1 | 228:16 | Department | |
| 188:17 | 238:2 | declaration | 172:9 | |
| criticizing | days 26:16 31:4 | 232:8,21 | depend 206:14 | |
| 191:13 | DC 16:8 | 233:11 234:8 | depends 82:9 | |
| CSR 1:17 3:22 | deal 71:24 73:18 | declare 145:19 | 83:23 142:21 | |
| 3:23 237:1 | 73:19,21 74:15 | declared 232:13 | 199:18 223:10 | |
| 238:10 | 91:13 154:15 | 234:24 | deposed 8:15,17 | |
| cunning 144:9 | 154:21 155:8 | declinations | 8:24 220:15 | |
| 144:19,23 | 155:17,24 | 129:12 | deposition 1:11 | |
| 145:1,2 | 156:5,12,20,22 | deeper 77:6 | 5:3,6,9,16 7:19 | |
| current 122:21 | 157:1,3,9 | defend 17:17 | 9:19 10:2 | |
| 128:13 | 161:13 163:4 | defendant 3:5 | 13:21 14:9,22 | |
| | | 3:10 5:17,18 | 45:13 49:22,22 | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 247

| | | | | |
|-------------------------|-------------------------|-------------------------|--------------------------|-------------------------|
| 55:18 60:4 | determination | directing 176:3 | discussed 74:3 | 18:19 50:1 |
| 62:9 64:23,24 | 188:21 192:15 | 190:14 234:3 | 77:2 78:15 | 95:21 169:21 |
| 65:3,22 84:7 | 200:15 | 234:10 | 118:1 144:7 | 171:5,16 |
| 95:19 108:5 | determine | direction 237:13 | 155:18 161:7 | 173:18 |
| 141:10 142:4,7 | 187:14 207:21 | directly 37:2 | 192:1 200:1 | documents |
| 150:7,8 152:12 | 228:1 | 38:19 43:15,20 | 203:4 207:11 | 48:14 49:19 |
| 154:13 168:9 | determined | 64:13 76:17 | 213:5 219:14 | 135:17 |
| 171:9,13 174:7 | 161:4 189:10 | 161:10 225:2 | discussing 99:7 | doing 16:23 18:3 |
| 177:13,13,15 | determining | 227:7 237:23 | 233:3 | 18:13 69:10 |
| 177:18,23 | 217:20 | disability 71:20 | discussion 83:11 | 85:20 100:13 |
| 182:2,8 183:7 | developed 36:19 | Disciple 53:14 | 187:5 220:10 | 107:19 108:14 |
| 207:2 212:15 | 77:4 156:1 | Disciples 53:16 | disposition | 111:9,15,16 |
| 220:13 236:5 | developmental | disclose 22:24 | 73:12 | 122:5 123:7 |
| 236:15 237:11 | 17:7 | 23:4 144:10 | dispositional | 187:22 210:12 |
| 237:17 | device 5:3 | disclosed 11:6 | 72:2 73:3,7 | door 150:4 |
| depositions 1:16 | Dezember 25:20 | 12:6 14:11,19 | 84:22 85:11 | dope 152:2 |
| 41:3 64:18 | dictate 217:5 | 15:2 136:8 | 93:10,12 98:8 | doubt 192:12 |
| 72:8 139:11,12 | difference | 147:8 | dispute 149:15 | 201:16 207:13 |
| 173:12 | 196:21 197:12 | discount 84:6 | dissertation | downloaded |
| describe 18:2 | 197:19 198:15 | 91:10 160:15 | 17:15,16,17,20 | 100:19,22 |
| 33:3 36:6 | 198:19 214:10 | 160:18,19,22 | 20:17,18 | Dr 5:10 7:4,7 |
| 112:15 116:3 | differences 33:7 | 166:3 191:17 | distinction | 28:22 35:13 |
| 121:2 123:6 | different 26:16 | 196:11,12 | 124:4 | 40:1 43:12,20 |
| 134:11 150:20 | 27:1,3,9,16 | 199:4 202:13 | distinguished | 44:4 50:24 |
| 151:21 171:16 | 44:14 50:17 | 213:12,13,15 | 95:14 | 54:9 56:11 |
| 232:24 | 80:18 109:18 | 213:16,18 | District 1:1,2,15 | 62:20 67:2 |
| described 30:18 | 115:3 129:13 | 214:12 217:10 | 5:12,13 | 77:24 79:17 |
| 90:12 98:20 | 137:22 163:8 | 220:10 221:2 | division 1:3 5:13 | 80:22 120:17 |
| 99:13 100:17 | 165:5,11 | 222:16 223:1 | 186:21 | 135:20 160:1 |
| 161:4 213:22 | 182:17 196:5 | 228:1,9 | docket 148:11 | 162:24 166:16 |
| describing 92:4 | 197:2 224:6 | discounts 72:1 | doctor 7:5,7 | 167:21 175:21 |
| 92:6 94:5 | differentials | 74:2 117:17,21 | 8:15 9:7,18 | 179:19 181:16 |
| 112:8 233:3 | 117:21 206:6 | 118:13 154:16 | 10:17 11:23 | 212:24 229:7 |
| descriptive 54:8 | differentiating | 161:3,15,17 | 12:16 16:2,2 | 229:13 234:2 |
| 149:21 | 91:5 | 163:15 164:20 | 22:15 29:8 | 234:15 235:4,7 |
| design 125:16 | difficult 171:18 | 213:7 219:13 | 32:1 40:17 | draft 15:5 233:6 |
| designed 199:15 | digging 31:11 | 219:15 220:3 | 62:12 96:5,7 | drafted 96:19 |
| detail 55:9 | digit 36:3,8 | 228:5 | 119:12 212:8 | drafts 232:23 |
| 162:17 176:3 | digits 36:11,11 | discoverable | 212:19 233:19 | 233:1,3 |
| detailed 148:9 | direct 11:5 12:4 | 176:5 | doctor's 41:20 | drinks 133:5 |
| details 20:1 | 13:15 38:4 | discovered 47:9 | 95:17 | Drive 2:18 |
| 210:24 | 104:23 106:3 | discovery | doctoral 16:24 | driver's 150:4 |
| detective 59:9,9 | 131:7 175:11 | 115:14,20 | 109:15 110:10 | driving 50:8 |
| detectives | 233:15 234:19 | discuss 13:18 | 110:15 111:7 | Drizzen 132:13 |
| 158:16 | directed 188:11 | 74:6 114:15 | document 18:17 | dropped 86:14 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 248

| | | | | |
|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| drove 50:10 | either 50:1 72:3 | enjoy 130:10 | 156:1 | existence 193:22 |
| drug 7:22 8:6 | 72:4 84:23 | 191:8 | exact 33:21 59:7 | exonerate |
| 45:20 46:7 | 91:8 94:1 | enter 103:23 | 170:9 183:15 | 100:12 |
| 47:13,19 48:6 | 100:1 110:22 | entered 212:16 | 190:6 196:10 | exonerated |
| 48:18,24 49:11 | 148:16,16 | enticing 157:9 | exactly 24:5 | 93:24 94:17 |
| 53:6 54:2 | 183:19 184:5 | entire 72:21 | 30:22 44:11 | 184:16 |
| 62:21 94:7 | 184:21 185:10 | entirely 49:5 | 48:21 76:22 | exoneration |
| 106:5,12 107:2 | 185:16 187:20 | enumerate | 86:21 116:23 | 98:23 |
| 107:6 118:20 | 200:2,16 | 165:23 | 117:4 118:4 | exonerations |
| 118:21 143:6 | 208:16 235:8 | equally 201:23 | 185:12 | 93:23 94:22 |
| 162:10 164:21 | Ekl 2:19 4:5 6:7 | equals 214:9 | examination | 98:22 99:23 |
| 166:6,17 202:6 | 6:7 167:9 | especially 19:9 | 1:12 4:2 6:21 | 100:3,6,24 |
| 202:8 216:22 | 171:16,22 | 113:16 | 181:14 212:22 | 101:1 112:24 |
| drugs 47:7,9,20 | 212:17,23 | essentially | 229:11 237:7 | expanded |
| 50:20,22 54:21 | 214:19 218:19 | 105:19 160:22 | examine 199:16 | 189:17,17 |
| 59:10 106:14 | 220:24 221:20 | 213:18 226:1 | examined 6:20 | expect 221:24 |
| 143:21 | 222:13,23 | estimate 19:24 | 95:13 116:9 | experience |
| duly 6:16,19 | 223:14 224:1 | 20:9 22:16,17 | 187:14 195:2 | 158:3 188:23 |
| 237:7 | 225:7,21 227:1 | 22:20 29:4 | 197:18 224:19 | experienced |
| E | | 108:17 123:2 | example 24:23 | 44:19 |
| E 2:14 4:1,8 | 227:19 228:20 | estimated 13:12 | 32:24 78:19 | experiences |
| earlier 21:2,3 | 228:23 229:4 | estimates 124:1 | 94:6 114:12,18 | 70:14,15,21 |
| 123:14 154:13 | 236:13 | et 1:8 5:10,11 | 135:20,23 | experiment |
| 156:13 157:24 | element 188:4 | 25:20,23 26:2 | 155:6 156:17 | 17:23 19:4 |
| 166:16 168:8 | 196:15 | ethical 136:8 | 193:9 214:21 | expert 8:20 12:5 |
| 173:9 174:7 | elements 114:24 | evaluate 68:15 | 218:8 | 12:6 13:17 |
| 175:3 200:1 | 115:2,4 163:6 | 229:16 | examples | 86:21 123:11 |
| 202:18 209:14 | 163:10 | evaluated | 116:15 | 123:19 125:3,8 |
| 224:7 | Elizabeth 2:19 | 229:13,21 | exceptions | 125:9,22,23,23 |
| earliest 108:6 | 6:7 | 230:4 | 68:17 121:17 | 126:9,18,19,24 |
| early 13:12 | else's 51:11 | event 106:17 | excessive 117:17 | 127:1,5,8,23 |
| 134:15,22 | email 129:24 | 149:11,13,14 | 118:13 161:3 | 128:4,7 129:19 |
| easily 129:23 | 135:7,18 | 150:16 151:10 | 166:3 | 129:20 130:4,8 |
| Eastern 1:3 5:13 | empirical | 151:21 209:17 | exchange | 132:6 136:16 |
| editor 121:14 | 121:23 200:13 | events 47:9 60:1 | 168:15 | 141:2 176:2 |
| educate 183:22 | employee | 150:15,23 | excuse 20:2 26:7 | 201:18 215:21 |
| educated 201:9 | 237:20,21 | 151:1 152:18 | 94:6 166:24 | expert's 207:19 |
| educating 38:20 | endeavor 79:1,1 | 158:8,9 | executed 232:9 | expertise 199:23 |
| effort 66:13,15 | ended 74:11 | evidence 51:16 | exercise 160:17 | 200:14 |
| 66:21 | enforcement | 100:11 150:21 | exhibit 4:9 | expires 238:12 |
| efforts 63:20 | 127:21 128:13 | 158:13,14 | 95:19,22 | explain 103:11 |
| 66:6 67:3,4 | 128:14,17 | 164:16 193:13 | 122:14 171:6 | 191:21 194:19 |
| eight 105:23 | 129:6 139:11 | 193:18 195:20 | 171:10 173:19 | 233:14 |
| Eighteen 108:4 | 164:10 | 196:19 207:24 | 173:23 | explanation |
| | engage 200:24 | evolutionarily | exist 112:19 | 234:7 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 249

| | | | | |
|------------------------|-------------------------|-----------------------|-------------------------|-------------------------|
| explore 188:14 | 54:18 55:8 | 201:24 202:17 | 103:14 104:20 | fight 203:3 |
| express 185:15 | 61:6 71:23 | 203:9,17 | 150:3 159:8,18 | figure 94:21,21 |
| expressed 52:2 | 72:2 73:4,4,7 | 204:10,10,20 | falsifications | 167:16 181:1 |
| 207:1 | 73:14,16 84:22 | 204:21 | 143:2 | fill 32:7,13 |
| extended 218:23 | 85:2,4,15 | failure 187:21 | falsified 141:16 | 82:19,21 |
| extent 8:4 11:9 | 86:23 90:20 | fair 9:9,23 | 141:23 142:15 | final 15:5,7,15 |
| 12:5 130:15 | 91:4,7,11,22 | 207:23 219:8 | 142:19 | 117:12 234:9 |
| 131:17 136:1 | 93:11,13,14,17 | Fairfax 16:7 | familiar 100:8 | finalized 235:12 |
| 145:9 232:23 | 95:13 97:15 | 109:22 | 214:22 217:2 | find 26:5 39:3 |
| extreme 72:1 | 98:8 154:11 | Falls 16:11 | 221:22 | 66:6 79:10 |
| 74:2 154:16 | 156:14 159:17 | false 17:24 | far 32:19 219:4 | 81:15 83:17 |
| 160:14 161:14 | 159:17 160:6 | 24:20 61:7 | faulting 74:13 | 102:5 129:14 |
| 161:16 163:14 | 162:9 165:6,10 | 79:23 82:1 | 74:16,20 | 129:22 140:11 |
| 164:20 213:7 | 166:2,4 169:6 | 87:17,21,24 | Fazio 1:16 3:22 | 140:12 147:3 |
| extremely 50:1 | 183:22 184:14 | 88:18 89:6,7 | 6:13 237:1 | 178:6,19 198:8 |
| 160:13 196:13 | 186:5 188:9,10 | 89:18,21 90:23 | 238:10 | 220:16 |
| F | | | | |
| F 3:4 | 191:14,20 | 91:4 92:6,14 | federal 1:13 5:7 | finding 198:23 |
| Facebook | 192:2 195:3 | 92:17 94:2,8 | 116:16 141:17 | findings 208:17 |
| 133:12,15,16 | 200:4 201:12 | 97:18,21 98:5 | 143:20 148:11 | 215:8 |
| 133:21,23 | 201:22 202:13 | 98:11,19 | federally 143:6 | fine 55:19 |
| 134:3 174:8 | 202:16,19 | 100:24 102:7,8 | feed 68:19 144:6 | 119:18 120:5 |
| faced 214:2 | 203:3,8 204:12 | 106:18 107:9 | feel 32:1 38:17 | 229:5 235:24 |
| 217:9 | 204:19,21 | 111:20 112:19 | 39:4,10 41:3 | finish 20:16 |
| facing 213:21 | 206:13 207:18 | 112:21 113:12 | 42:17 57:7 | 128:2 226:14 |
| 215:14,15 | 207:22 208:12 | 113:13 118:7 | 58:9,20 61:13 | finished 87:2 |
| 221:2 222:11 | 208:24 209:1 | 123:21 124:9 | 61:17 68:8,8 | 110:16 159:24 |
| 227:22 | 210:8 211:24 | 124:10,10,17 | 68:14 152:23 | 212:3 |
| fact 50:7 52:2 | 213:5 217:22 | 126:13 127:3 | 167:7 189:14 | finishing 86:20 |
| 54:12 57:10 | 217:24 218:1 | 132:2 140:24 | 189:15 | firm 10:22 11:3 |
| 60:12 76:12 | 218:11,12 | 141:1 154:12 | feeling 119:21 | 12:15 15:22 |
| 88:5,23 90:2 | 223:19 | 154:22 157:15 | 180:21 | 62:2 123:15,17 |
| 117:3 145:18 | facts 88:16 | 162:5,9 164:20 | fellow 111:13 | first 6:19 9:13 |
| 163:5,9,11,13 | 136:2 149:23 | 166:17 182:13 | 164:17 | 23:12 26:8 |
| 163:16 191:2 | factual 135:19 | 182:20,24 | felon 172:10 | 45:13,16 90:14 |
| 217:18,23 | 187:17 188:8 | 183:9,20,23 | felonies 34:7 | 92:3 95:10 |
| 219:6 226:20 | 188:13 | 184:6,11,15,21 | 219:10 | 96:7 108:17 |
| factor 91:5,5 | factually 61:4,4 | 185:11,17,23 | felony 33:8,11 | 115:17 116:13 |
| 157:19 158:7 | 87:9 91:6,6 | 186:5,11,23 | 33:19,24 34:4 | 118:15 122:19 |
| 158:19 160:15 | 112:6,16 | 191:23 194:1,9 | 34:4,8,10,22 | 122:22 125:12 |
| 164:8,9 191:21 | 190:19,23 | 194:22 200:4,7 | 106:23 149:24 | 137:1 143:7 |
| 191:23 193:21 | 192:6,7,20,23 | 201:3,11 202:5 | 222:11,11 | 146:7,23 |
| 194:4,6,13 | 193:9,11 | 202:9 206:6 | females 34:16 | 147:22 164:15 |
| factors 50:18 | 195:13 196:22 | 208:21,23 | fewer 33:15 | 165:4,6,16 |
| | 196:23 197:20 | 210:9,10 | field 199:23 | 172:13 174:21 |
| | 198:1,1 201:24 | falsely 99:20 | 200:13,24 | 176:1,10 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 250

| | | | | |
|-------------------------|-----------------------|-------------------------|------------------------|------------------------|
| 180:17 181:9 | 15:10,19 16:17 | formulate 65:14 | fundamental | give 9:22 14:9 |
| 183:11 212:4 | 16:20 21:13 | formulating | 112:2 117:24 | 28:10 36:9 |
| 214:20 230:17 | 29:9 37:5 38:2 | 76:20 150:13 | funded 111:6 | 61:10 89:4 |
| 232:17 | 38:14 39:12 | forth 200:5 | further 59:16 | 116:15 118:7 |
| firsthand 35:17 | 40:22 42:11 | Forty-five | 117:6 176:3 | 133:19 135:20 |
| five 27:13 36:11 | 45:23 46:9 | 119:15 | 229:11 | 146:5 171:22 |
| 62:13 94:8 | 47:2,14 48:7 | forward 36:13 | futile 194:17 | 182:3 183:8 |
| 124:6 162:13 | 49:1,13 50:12 | 116:18 | futility 74:1 | 185:9 199:2 |
| 162:14,17,20 | 52:5 53:8,17 | forwards 36:16 | 154:15 157:18 | 204:18 232:6 |
| 162:21,21 | 57:13 58:3 | found 19:7 | 158:19,22 | given 7:19 40:1 |
| 164:24 165:17 | 59:3 64:5 66:9 | 33:11 59:10 | 159:11 164:12 | 42:24 48:14 |
| 165:20 166:20 | 69:14 72:15 | 65:18 86:9 | 166:3 191:16 | 86:12 124:15 |
| 166:22 214:3 | 75:8 77:15 | 94:6 116:8,10 | 193:8,13,22,22 | 136:1 138:9 |
| 217:15 | 79:7 81:6 | 148:17 150:3 | 194:16 196:15 | 139:8 158:10 |
| five-minute 35:3 | 84:10 85:21 | 153:5,16 | 196:17 198:16 | 159:15 160:7 |
| 212:6 | 87:5 88:9 90:5 | 179:20 198:15 | 202:13 | 166:1 202:19 |
| fix 185:1 | 101:10 103:1 | 210:13 | G | 210:24 213:8 |
| Flaxman 2:7,9,9 | 105:5 106:7 | foundation 7:23 | gang 53:21 | 213:17,17 |
| 5:24,24 6:1 | 115:1 126:2 | 15:11 37:5 | Gangster 53:14 | 237:15 |
| 212:14,16 | 132:7 135:13 | 38:2 47:14 | 53:15 | giving 51:14 |
| Floor 2:2 | 135:24 137:7 | 48:8 49:1,13 | gather 37:3 | 54:6 64:10 |
| focus 25:5,10 | 138:5 139:5,22 | 53:17 111:6 | GED 86:16,18 | 75:17 161:22 |
| 27:4 92:15,18 | 140:20 141:19 | 141:19 179:23 | 86:19 87:3 | 192:8,21,23 |
| 102:17 115:15 | 143:9,24 | 191:5 218:14 | general 17:6 | 197:2 203:6 |
| focused 33:5 | 144:14 147:19 | four 27:12 | Glenn 1:5 7:1 | 210:24 213:8 |
| 78:11 98:10 | 152:4,20 | 111:16 165:20 | 10:7 37:17 | 213:17,17 |
| 102:9 103:20 | 168:16 169:21 | 189:22 214:4 | 38:12 39:1,8 | 237:15 |
| 202:16 | 179:23 180:11 | 216:23 | 39:24 42:4,10 | giving 51:14 |
| follow 213:4 | 184:7,22,24 | frame 13:10 | 54:6 64:10 | 54:6 64:10 |
| follow-up | 186:1,12 193:3 | 22:1 24:24 | generalize | 75:17 161:22 |
| 181:20 229:2 | 194:23 200:8 | 25:11 125:2 | 199:19 | 192:8,21,23 |
| following | 200:18 201:4 | framed 135:21 | generally 23:21 | 197:2 203:6 |
| 130:23 | 202:2 203:21 | friend 132:21 | 68:4 98:4 | 204:18 213:8 |
| follows 6:20 | 208:6 214:15 | 174:8 232:17 | 102:12 105:10 | 210:24 213:8 |
| Force 117:19 | 220:20 221:6 | friendly 133:8 | 105:17 112:14 | 237:15 |
| forecasting | 222:18 223:6 | friends 133:11 | geographic | 60:13 62:21 |
| 221:12 | 223:21 224:15 | 134:3 | 23:21 | 63:16 65:14 |
| foregoing | 227:4 | front 64:3 80:23 | George 110:1 | 66:16 67:22 |
| 145:20 232:14 | formal 125:20 | 96:16,17 | getting 86:19 | 71:8 72:12 |
| 237:11 | former 128:13 | full 51:10 59:24 | 130:8 146:23 | 73:1 75:6 76:2 |
| forensic 230:1 | forming 135:11 | 95:10 114:11 | 154:3 160:23 | 76:17 80:23 |
| 231:9,18 | 177:20 | full-blown 122:5 | 160:23 163:11 | 83:19 85:17 |
| forget 179:1 | forms 32:7 | fully 58:21 | 163:14,14 | 86:17 90:2 |
| forgetting 144:4 | 114:20 116:9 | 136:15 | 190:6,24 | 115:18 118:3 |
| form 7:23 10:8 | 163:8,9 | fund 111:7 | 204:15 | 119:2 123:8 |
| | | | | 128:12 135:21 |
| | | | | 137:2,15 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 251

| | | | | |
|----------------------|-----------------------|------------------------|------------------------|----------------|
| 138:16 139:3 | 144:1 146:5 | 154:16 157:18 | 189:24 199:16 | 92:21,24 93:1 |
| 139:16 140:12 | 149:10 151:6 | 158:13,19,22 | 199:16,17 | 93:4,5,13,14 |
| 150:6,12 | 152:5,21 | 159:4,11 | guess 13:12 | 93:15 94:2,8 |
| 151:11,13 | 154:11 157:1 | 161:18 164:12 | 16:22 63:18 | 97:9,10,11,18 |
| 152:1 154:23 | 157:17 161:1 | 164:19 166:10 | 129:4,5 131:6 | 97:21,22 98:1 |
| 160:21 161:11 | 162:17,20 | 169:1 175:11 | 131:15,17 | 98:3,5,11,13 |
| 163:5,19,22 | 164:18 169:22 | 175:17 178:10 | 132:23 172:16 | 98:16,19,19 |
| 164:1 168:3 | 176:3 179:4 | 179:13 181:17 | 174:22 181:3 | 99:1,2,6,10,10 |
| 169:10 170:6,7 | 189:17 191:14 | 182:11 187:12 | 235:21 | 99:11,18,20,20 |
| 179:7 182:12 | 204:2 205:9 | 194:16 195:9 | guessing 108:19 | 100:24 101:3,8 |
| 183:3 186:22 | 209:10 216:12 | 195:10 196:4 | 108:21 | 101:9 102:8,13 |
| 187:21 188:11 | 223:17 224:2 | 200:5 202:20 | guilt 101:16 | 102:14,19 |
| 191:16 195:17 | 225:17 227:5 | 203:1 205:23 | 102:18 187:17 | 103:14,15,21 |
| 206:17,21 | 229:4,4 232:7 | 207:12 211:5 | guilty 8:16,21 | 104:5,6,13,16 |
| 207:4 208:21 | 232:17 233:3 | 212:9 213:14 | 21:18 24:20 | 104:17,18,20 |
| 209:7 213:8,13 | 235:10,22 | 216:12 217:17 | 26:2 28:23 | 105:3,4,15,18 |
| 213:21 215:11 | 236:2 | 223:1,2,4 | 29:7,17,17,20 | 105:20,22,23 |
| 216:11 217:9 | goal 32:4 | 229:8 230:5 | 29:24 30:23 | 106:4,5,18,22 |
| 218:8 219:4,23 | goes 129:17 | 232:4,22 | 33:8,9,19 | 107:2,9 108:8 |
| 222:1 | 130:15 131:8 | 233:22 234:19 | 34:22 35:16,17 | 111:20 112:3,6 |
| Glenn's 46:24 | 136:1 188:4 | 235:9 | 37:2 38:21 | 112:6,11,16,17 |
| 49:21 51:21 | 199:4 221:10 | good 5:21 6:5,7 | 42:23 43:5,11 | 112:19,20,21 |
| 72:23 136:23 | going 8:12 9:7 | 6:23 7:4 19:17 | 44:5,7,8,16,20 | 113:3,4,11,11 |
| 162:4 168:21 | 11:4 14:22,24 | 40:2 66:22 | 45:20 46:7 | 113:12,13,15 |
| 168:23 169:5 | 20:9 21:2 | 69:20 156:16 | 54:20 55:7 | 113:17,19 |
| 183:19 185:10 | 22:16,20 23:1 | 156:22 158:9 | 56:24 57:4,10 | 114:1,5 115:15 |
| 208:4 210:15 | 26:12 29:4,23 | 178:22 212:2 | 58:16 59:8 | 115:23 116:24 |
| 211:13 | 35:7 43:21 | 212:24 229:5 | 61:4,7 62:21 | 117:1,8 118:8 |
| go 9:1 11:10 | 44:12,17 45:22 | Google 129:23 | 64:1 67:23 | 118:9,19,20,21 |
| 13:24 20:10 | 51:23 55:17,23 | Gotcha 24:15 | 68:2,12,12,13 | 118:21 119:4 |
| 24:17,18 26:16 | 55:23 56:12 | gotten 86:15 | 68:21 69:2,9 | 120:19 121:21 |
| 27:16 30:24 | 62:15 71:24 | government | 69:11 74:11,11 | 122:23 123:21 |
| 51:7 52:11 | 74:1 79:6,9 | 192:11 | 75:2,6,14 81:5 | 124:2,5,10,16 |
| 55:6 56:1 | 83:9,16 88:15 | graduate 110:9 | 81:12,17 85:19 | 124:18 125:1,5 |
| 57:22 58:6 | 92:8 95:17,18 | 110:18,21,22 | 86:16 87:4,8,8 | 125:8,16,21 |
| 74:9 78:13 | 96:15 107:19 | 110:23 111:1,7 | 87:9,9,12,15 | 126:5,7 141:1 |
| 79:7,10,13 | 108:16 115:2 | grams 217:15 | 87:17,21 88:1 | 143:12 153:16 |
| 82:12 93:16 | 119:10 120:6 | grave 74:20 | 88:2,7,23 89:6 | 153:23 154:5 |
| 95:9 96:2,11 | 120:10 122:16 | great 212:5,19 | 89:13,16,18,19 | 154:12,22 |
| 96:20,20 97:2 | 122:24 123:2 | 228:22 | 89:21 90:3,17 | 155:2,17 156:4 |
| 97:9 101:2 | 123:15 124:2,5 | greater 221:17 | 90:18,20,23 | 156:10,11,15 |
| 110:18 116:18 | 124:8 130:5,14 | ground 9:1 | 91:1,2,4,7,8,9 | 156:15,16,21 |
| 124:6 125:4 | 131:6,7 144:11 | group 28:21 | 91:17 92:1,1,5 | 156:21 157:2 |
| 128:2 130:18 | 144:20 153:10 | 34:11 206:9 | 92:6,9,10,11 | 157:14,15,22 |
| 131:18 143:10 | 153:22 154:10 | groups 100:14 | 92:14,16,17,18 | 158:6,21 159:3 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 252

| | | | | |
|----------------|------------------------|------------------------|-------------------------|------------------------|
| 159:4,10,12,19 | 214:5 215:8 | harassing 56:4 | 188:15 211:2,3 | 155:3,4 163:12 |
| 159:19,21,21 | 220:19 221:3,3 | 145:9 147:20 | helped 154:21 | honest 135:2 |
| 159:23 160:7,8 | 221:4 223:1 | 179:16 180:12 | helpful 76:20 | honestly 132:10 |
| 160:8,9,10,12 | 224:21 228:12 | hard 65:10 | 178:19 | Hoover 102:1,2 |
| 160:12 161:5,6 | 228:17 229:24 | harder 197:6 | helping 110:6 | hope 160:11,11 |
| 161:14,16 | 230:5 | hazards 188:10 | hereto 237:23 | hopefully |
| 162:4,5,10 | gun 214:3 | head 8:19 34:17 | hereunto 238:1 | 113:12,13 |
| 164:2,21 | <hr/> H | 177:3 199:2,6 | heroin 47:10 | 171:14 |
| 166:17 173:16 | H 2:4 4:8 | 204:7 | 50:9 51:2,11 | hour 31:23 |
| 182:12,12,13 | hair 231:19 | heads 233:10 | 51:12 52:1,19 | 35:22 82:14,19 |
| 182:23,24,24 | Hale 2:12 6:4 | health 73:10 | 52:23 54:11,12 | 83:21 119:14 |
| 183:9,10,19,23 | half 18:16,19 | 86:12 101:19 | 57:11,24 60:13 | 119:15,24 |
| 184:11,13,15 | 119:14,24 | 101:20 102:10 | 139:3 217:15 | 120:3 |
| 184:20 185:10 | 120:3 | 102:11 | hey 29:23 35:2 | hours 174:4 |
| 185:16,23,23 | hallmark 90:22 | hear 59:24 | 39:24 76:18 | 179:17 236:6 |
| 186:5,11,11,23 | 92:10 93:6,8 | 167:9,12 | 77:21 | house 143:21 |
| 186:24 187:7 | hallmarks 90:16 | 183:11 185:8 | Hi 181:16 | huge 129:10 |
| 187:15 188:5 | 91:1,17,24 | 212:17 | high 86:14,20 | human 23:2 |
| 189:12 190:19 | 92:23 93:17 | heard 89:12 | 87:3 195:18,23 | 26:4 44:23 |
| 190:19,23,23 | 94:4 97:11,18 | 92:4,9 140:6 | 195:24 196:13 | 205:6 |
| 191:4,24 192:3 | 98:5 140:24 | 140:10 143:7 | higher 197:7 | humans 156:1 |
| 192:3,6,7,8,11 | 162:2,4,7,14 | 176:10 183:7 | 198:22 | hundreds 137:3 |
| 192:20,21,23 | 162:21 163:19 | 211:19 231:2,4 | highlight 177:22 | 138:12 179:7 |
| 193:9,10,11,12 | 165:3,5,10,16 | 231:8 | 177:23 178:3,5 | 184:15 |
| 194:1,5,8,20 | 165:20 184:11 | hearing 62:22 | 178:8,15 | husband 48:23 |
| 194:22 195:13 | 206:13 208:13 | 77:22 80:21 | highly 67:7 | 49:6,11 163:23 |
| 195:13 196:1 | 208:21 | 104:22 108:18 | hired 10:21 | 164:7 |
| 196:22,23 | hallway 30:24 | 108:23 109:6 | 127:23 | hypothetical |
| 197:3,5,9,11 | hand 6:15 68:9 | 152:8 153:7 | 37:6 39:17 | 42:12 50:13,19 |
| 197:20,20 | 87:16 112:4 | 154:6 161:12 | 53:2 54:7 | 53:2 54:7 |
| 198:1,16,17,21 | 168:5 190:12 | 167:1,8 213:23 | 57:14,20 58:5 | 57:14,20 58:5 |
| 198:22,24 | 238:2 | 227:15 | 58:19 60:9,11 | 88:3 89:4,17 |
| 199:1,5,6 | handy 62:6 | hearings 21:19 | 89:10 170:20 | 90:1,12 144:15 |
| 200:3,17 201:3 | happen 70:11 | 21:22 22:10,12 | 171:20 172:9 | 155:6 186:13 |
| 201:11,13,15 | 155:7 202:7,9 | 22:13,14,23 | 172:14 218:13 | 209:10 211:19 |
| 201:17,24 | 223:5 | 23:7 26:2 | 218:17,21,24 | 225:4 |
| 202:1,5,7,8,9 | happened 23:20 | 27:24 32:22 | 221:22 | hypotheticals |
| 202:17,20,21 | 80:23 84:18 | 33:7 108:9,10 | hit 18:12,18 | 51:16 59:22 |
| 202:21,24 | 149:16 151:11 | 108:13,24 | 19:11 | <hr/> I |
| 203:9,18,18 | 153:1 168:14 | 109:2,7 114:19 | hitting 18:15 | i.e 73:21 |
| 204:10,11,13 | 173:7,8 195:19 | 142:23 219:19 | Hobson's | ID 4:9 |
| 204:19,20,21 | 210:14 | 221:23 | 117:16 | Ida 49:12 54:3 |
| 206:6 208:20 | happy 78:12 | heart 78:1 | hold 231:23 | |
| 208:22,23 | 133:19 | 133:19 | 234:22 235:2 | |
| 210:10 213:14 | harassed 180:21 | help 148:7 | home 73:22 | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 253

| | | | | |
|---|---|--|--|--|
| idea 8:6 14:1,14 22:17 40:2 66:5 85:6 86:5 107:4,7 139:2 164:11 221:1 | important 74:18 116:12 145:6 145:13,24 146:3,4 152:14 189:24 209:20 | indicating 18:18 indication 75:20 indirectly 237:23 individual 2:15 impose 218:2 impossible 38:23 39:3,17 113:16 impression 28:11 imprisonment 155:14 incarcerated 30:22 include 34:12 99:3 115:2 170:19 | indicating 18:18 indication 75:20 indirectly 237:23 individual 2:15 impose 218:2 impossible 38:23 39:3,17 113:16 impression 28:11 imprisonment 155:14 incarcerated 30:22 include 34:12 99:3 115:2 170:19 | insight 194:21 insinuating 80:15 instance 5:18 26:17 68:10 106:4 129:3 177:8 216:11 Instanter 5:2 instructing 131:13 234:15 instruments 36:22 insufficient 189:14 integrity 125:18 intelligence 33:16 36:23 115:5 187:16 188:6 intelligent 67:8 75:14 78:3 81:4 102:20 187:7 188:22 intelligently 75:3 intend 181:23 183:17,18 185:9 205:17 intending 182:2 182:22 183:5 interactions 134:12 interest 130:24 202:24 interested 31:1 80:11 130:20 130:22 237:23 Internet 148:17 148:24 interrater 27:18 interrogatories 41:4 142:16 interrogatory 141:12,16 |
| II 112:8 115:18 118:11,15 161:2 | included 122:13 124:19 154:4 179:1 234:23 | individual's 68:1 individually 100:16 individuals 21:11 28:2 29:7 32:2 | informed 30:19 53:4 114:6 inherent 72:3 73:8 initial 129:12 175:4 | initially 175:15 innocence 100:11 101:16 102:18 137:18 |
| III 118:5 136:22 179:6 | including 108:7 119:18 111:18 157:22 | 137:24 138:4 120:18 128:4 | 137:24 138:4 191:9 203:6 | innocent 61:5 69:23 91:6,9 93:15 94:16 |
| Illinois 1:2,18 2:3,8,13,18 3:3 3:8 5:5,13 106:24 113:20 214:22 215:22 217:3,4,19 237:3 238:2,11 | income 130:3 incomplete 37:6 42:11 50:12 57:13 58:4 144:15 186:13 | 137:3 138:12 179:7 199:17 200:7 | 102:14 104:2 influence 58:18 192:3 201:12 | 112:19 113:3 113:14 118:7,8 |
| illness 102:9 103:9,13 104:8 | inconsistency 234:8 incorporate 208:2 | 137:20 156:16 168:24 | 137:20 156:16 156:20,24 | 156:20,24 157:10,22 |
| imagine 195:15 | increase 159:7 159:17 191:23 | inform 40:20 42:6 69:10 | 158:5 159:7,18 information 159:22 160:6 | 158:5 159:7,18 161:5 191:24 |
| imagined 195:16 | 203:4,19 | 12:7 23:1,13 | 194:5 196:1 | 194:5 196:1 |
| impact 196:21 198:16 | 204:12,19,20 210:9 | 30:13 31:3 35:16 37:3 | 197:3,4,11 | 197:3,4,11 |
| impacts 199:16 | increases 36:10 | 51:13,14 53:2 | 198:1 199:5 | 198:1 199:5 |
| impairment 71:16 72:13 73:10 | 194:4 199:3 203:20 | 57:18 58:10,20 59:16 60:2,20 | 201:15 202:23 203:2,4 208:15 | 201:15 202:23 |
| impairments 73:2 | increasing 203:17 | 60:23 61:1,10 61:24 64:12,17 | 223:2 224:21 | 223:2 224:21 |
| impinge 170:5 | indicate 12:11 | 70:19 83:21 | inquiry 46:18 | inquiry 46:18 |
| implying 66:20 | 76:11 193:24 | 88:2 98:8 | inside 50:10 | inside 50:10 |
| | indicated 151:3 | 114:6,11 | 52:1 54:11,12 57:24 139:4 | 52:1 54:11,12 57:24 139:4 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 254

| | | | | |
|-------------------------|-------------------------|------------------------|------------------------|----------------|
| 142:8 144:11 | issue 61:2 62:2 | 153:13 158:2 | keeping 28:3 | 113:6,21 |
| interrupt 56:3 | 69:17 87:16,18 | 158:12,17 | Kenneth 2:7,9 | 119:24 120:3,9 |
| 83:5 | 88:13 182:3,9 | 161:10 164:10 | 212:16 | 126:2 130:14 |
| interview 31:22 | 189:23,23 | 164:15 173:8 | key 18:12,16,17 | 131:6,10,15 |
| 32:23 36:18 | 199:18 211:9 | 187:14 188:21 | 18:18 19:11 | 132:7 135:13 |
| 44:22 45:2 | issued 61:18 | 213:23 215:20 | 91:4,5 | 135:24 137:7 |
| 99:8,15,16 | issues 114:16 | 215:24 219:18 | kids 19:6,14,21 | 138:5,17 139:5 |
| 101:15 | 195:22 199:20 | 221:24 227:15 | 20:5 133:18 | 139:22 140:20 |
| interviewed | 235:15 | 227:16 228:17 | 143:22 | 141:19 142:10 |
| 21:23 28:9 | items 179:21 | judge's 76:10 | kind 7:7 73:19 | 143:9,24 |
| 29:14 31:5 | IV 161:19 | 196:19 | 76:24 114:21 | 144:14 145:8 |
| 53:15 227:9 | J | judges 189:13 | 115:6 133:22 | 147:5,19,22 |
| interviewees | J.D 232:18,18 | 189:21,21,22 | 144:11 149:23 | 148:19 151:4 |
| 30:5 | 232:19 | 190:4 217:19 | 152:13 161:19 | 152:4,20 157:4 |
| interviewer 83:1 | Jackson 2:13 | 217:24 225:1 | 163:20 197:10 | 159:24 162:23 |
| interviewing | jail 30:6,11,12 | jurisdiction | 210:21 221:22 | 166:9 167:7 |
| 32:5 35:13,15 | 30:22 31:12,21 | 189:7,9 | kinds 117:14 | 168:16 169:14 |
| 43:10 44:15,16 | 97:14 105:13 | jurisdictions | 143:2 153:8 | 169:20 170:22 |
| 99:2 102:13 | 105:13 | 188:24 | Kleinhaus 2:4 | 173:1,4 174:16 |
| interviews 28:24 | January 26:6 | juror's 183:1 | 5:21,22 7:23 | 174:20 175:11 |
| 29:3 31:20 | job 38:19 183:21 | jury 38:20 61:3 | 8:3 10:8 11:4 | 175:19,24 |
| 32:9 43:19 | 183:21 | 62:3 74:10 | 12:4 13:15 | 176:11 179:13 |
| 82:14 111:10 | Joel 2:9 5:24,24 | 87:18 88:15 | 15:10,19 16:17 | 179:23 180:11 |
| 111:15,16 | 212:14 | 89:10 181:23 | 16:20 21:13 | 184:7,22 185:4 |
| introduce 5:20 | JOHNSON 3:1 | 182:4 183:17 | 23:16 29:9 | 186:1,12 191:5 |
| 6:12 | Jones 59:9 | 183:22 186:6 | 37:5 38:2,14 | 193:3 194:23 |
| invades 38:3 | 150:17 151:2 | 192:14 201:13 | 39:12 40:6,22 | 200:8,18 201:4 |
| 175:17 233:16 | 152:1 | 201:14 207:12 | 41:9,18 42:11 | 202:2 203:11 |
| investigation | Jones's 58:22 | 208:1 | 45:22 46:9 | 203:21,24 |
| 147:3 | 151:15 | jury's 183:1,4 | 47:2,14 48:7 | 205:19 208:6 |
| invoice 10:15 | Josh 131:20,22 | juvenile 21:19 | 49:1,13 50:12 | 209:10 210:17 |
| 173:23 174:12 | 132:11,12,14 | 22:11 24:9,10 | 51:5,7 52:5 | 211:15 212:1,5 |
| 174:23 175:16 | 136:6 147:18 | 26:3 27:2 | 53:8,17 55:15 | 214:15 218:14 |
| involuntary | Joshua 232:18 | juveniles 17:21 | 55:19 56:4 | 220:20 221:6 |
| 61:7 72:4 | journal 121:6 | 28:4 132:3 | 57:13 58:3 | 222:4,18 223:6 |
| involve 168:22 | 122:20 | K | 59:3,18 61:14 | 223:21 224:15 |
| involved 53:1 | judge 33:14 | K 40:15 | 64:5 66:9,17 | 225:16 226:11 |
| 67:20 69:24 | 38:20 64:4 | Kallatt 6:9 | 69:14 72:15 | 226:24 227:4 |
| 120:18 129:8 | 75:16 76:2,5 | 181:19 | 75:8 77:15 | 228:22 229:6 |
| 139:17 188:24 | 76:18,23 77:22 | Karen 1:16 3:22 | 78:6 79:6 81:6 | 230:10,19 |
| 199:15 | 80:24 87:13 | 6:13 237:1 | 84:10 85:21 | 232:19,22 |
| involves 149:5 | 88:16 113:14 | 238:10 | 87:5 88:9 90:5 | 233:15,21 |
| 168:3 | 116:24 117:5 | keep 144:3 | 91:18 96:3 | 234:2,10,15,18 |
| involving 25:1 | 117:10 153:4,8 | 177:2 | 101:10 103:1 | 235:5,7,21 |
| 121:20 | | | 105:5 106:7 | 236:2 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 255

| | | | | |
|---|---|---|--|--|
| knew 49:5 54:11 75:6 84:19 181:16,17 220:7 know 7:19 8:4 8:19,24 9:5 14:13,15,20,21 15:1,4 16:2,4 17:10 23:3,12 23:14 26:12,17 26:23 27:11 28:6,14,21 32:16 33:20 34:16 36:11,14 36:14,21,23 39:16,19 40:5 40:10,11,14 43:2 46:12,14 46:15,16 47:18 49:11 51:4,9 51:11,20 52:6 52:16,18,20 53:1,2,11,13 53:19 54:1 57:18 58:9,18 59:17,21 60:8 63:7,15 64:1 64:22 65:6,8,9 65:19,20 66:1 66:1 67:6,6,7 67:14 69:7,18 69:22 70:13 72:6 75:22 76:13,14 77:7 77:23 78:12 79:10,22,23 80:7 81:3,20 83:17 84:17,17 84:19 85:1,1 86:2,11,19 87:1 88:6 89:24 90:13 91:13 95:17 96:4,12 97:13 97:23 98:24 | 99:18,21 100:4 100:10,22 101:7 102:6 103:14,22,23 105:12 106:14 106:14,15,15 107:1 108:3,12 108:17,17 111:19 112:10 112:18,23 113:1,9,24,24 115:3,8 116:7 116:8,11,15,20 117:1,7,8 118:10,14 119:13,19,20 121:10 122:12 122:12 123:13 124:2,9 125:1 125:23 129:1,4 129:8,10,11,14 129:18,18,24 131:1,22 132:1 133:7,17,19 134:19 135:17 136:18 137:23 138:2 141:9,22 141:23,24 142:22 143:3 144:18,19,21 144:23 145:1,2 145:5 146:3 148:14,15 150:20 154:10 154:24 155:5,6 155:12,20 156:23 158:14 159:9 160:19 162:16 163:8 163:13 164:7 164:23 165:13 165:16 167:21 169:4 170:14 172:18,21 173:6,9,14 | 174:1 175:3 176:18,22 177:8 178:7,20 179:16 180:4 181:4,4,6 185:11,12,21 186:9,16 187:19,21 189:11 190:24 192:22 194:17 195:4,6,14,16 195:21 196:6 197:21,24 198:4,5 204:6 207:10,10,11 208:8 210:5 211:23,24 213:1 215:20 215:22,24 216:10,15 217:14 218:3,4 218:5,17 219:23 220:7,8 220:9,15,23 221:1,4,13 222:8,9 224:20 227:8 228:13 231:16,20 232:1 233:6,7 knowing 65:10 75:14 78:2 81:4 102:20 187:7 188:4,6 188:21 230:6 knowingly 57:23 75:2 knowingness 33:16 115:5 knowledge 134:5 231:17 known 47:24 107:9 112:21 114:13 132:22 171:20 208:23 | 210:9 knows 66:7 95:20 120:7 158:20 164:5,6 164:14 201:14 L lab 17:22 198:5 198:5,7 204:22 224:12 225:22 225:24 label 138:21 laboratory 18:8 198:2,3 223:24 226:18 228:3 lack 67:3 large 101:16 199:16 largely 8:21 129:21 larger 199:4,17 LaSalle 5:4 lasted 133:9 late 25:24 204:15 laughing 226:11 law 2:7 26:4 75:4 121:18 123:3 127:20 128:13,14,17 129:6 132:13 139:10 164:10 205:6 215:22 217:4 227:20 laws 214:22 217:2 lawsuit 67:15 lawyer 14:13 lawyers 37:24 lazy 66:20 67:2 67:6,7 lead 93:13 117:21 154:21 156:14,15,20 156:21,24 | 160:6 183:23 183:23 201:9 leading 154:11 161:5 leads 140:22 lean 139:13 140:15 learned 32:1 98:9 learning 71:20 leaves 188:7 led 17:20 55:10 85:4 left 167:7 212:14 legal 34:24 103:17 112:3 116:12 123:11 132:14 231:15 lengthy 50:2 79:12 leniency 91:10 97:12 let's 24:1 25:5 25:10 52:11 54:7,10 56:1 57:9,22 73:15 92:15 93:16 95:16 97:9 104:17 123:23 123:23 136:21 145:19 146:5 157:17 161:18 162:7 166:7,8 169:17,17 171:9 173:22 179:4 191:14 193:8 203:23 228:20 letter 232:16,17 233:12 level 33:11 liar 144:9,19,24 145:1,2 life 169:12 likelihood 17:23 |
|---|---|---|--|--|

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 256

| | | | | |
|--------------------------|-------------------------|--------------------------|-------------------------|-------------------|
| 19:1 89:5 | 11:3 12:14,14 | lot 24:20,21 53:1 | March 94:15 | 34:21 36:19 |
| 159:7,18 183:8 | 13:11,11 15:22 | 79:3 80:18 | 95:5 232:9,12 | 51:12 54:18 |
| 183:18 184:5 | 15:22 123:15 | 83:3 91:7 | 232:19,21 | 56:12 60:10 |
| 184:20 185:5 | 123:15,16,16 | 92:13 96:15 | 233:12,12 | 63:2 68:16 |
| 185:16,18 | 134:4,4 | 129:12 169:2 | 234:23 235:1 | 69:19 73:6 |
| 194:4 200:2,6 | logically 191:2 | 196:5 208:22 | mark 95:17,19 | 74:23 76:24 |
| 200:15 201:2 | long 19:12,16,24 | lots 35:21 44:14 | marked 4:9 | 77:18 79:7,11 |
| 202:21,22 | 20:15 34:20 | 130:9,9 137:22 | 95:22 171:6 | 79:12 83:23 |
| 203:4,17 | 55:18 62:11 | 196:24 197:4 | 173:19 | 84:6 87:15,16 |
| 204:12 220:5 | 67:17 174:13 | 198:2 | Mason 110:2 | 87:19 88:14 |
| 221:12 222:2 | 209:14 213:1 | love 156:2 | material 179:15 | 92:3 93:7,17 |
| limitations | longer 89:20 | low 193:23 | materials 39:6 | 93:19 97:17 |
| 198:5 | look 20:10 24:18 | 194:17 | 61:20,21 65:13 | 110:14 116:2 |
| limited 74:5,17 | 27:21 34:18,20 | lower 218:22 | 79:10 86:11 | 119:18,20 |
| 123:16 | 37:9,10 43:21 | lunch 119:10 | 119:6 138:9 | 122:24 128:1 |
| limiting 104:9 | 51:13 68:5 | 120:13 | 139:9 141:7 | 128:22 129:9 |
| line 179:14 | 71:10,11 78:13 | lurk 133:23 | 169:2 177:9 | 131:15,16 |
| lines 13:3 | 85:8,10,12,13 | lying 142:23 | 178:3,8,14,16 | 133:1 135:14 |
| list 81:18 172:4 | 85:14 96:14 | 143:1 | 179:9 207:7,8 | 140:8 141:22 |
| 172:5 180:3 | 115:3 122:6,9 | | 207:9 209:5 | 141:23 142:18 |
| listed 51:17 | 122:18 136:21 | M | 211:11 | 142:21 143:12 |
| 78:15 91:22 | 161:18 167:22 | magic 87:20 | matter 5:10 61:2 | 145:9 146:15 |
| 97:16 178:17 | 171:9 173:22 | 88:4,21 89:15 | 78:2 118:3 | 147:2 148:13 |
| listened 139:12 | 178:10 181:4 | 99:19 | 119:2 123:7 | 150:15 153:19 |
| 178:21 | 224:6 226:9 | magically 87:20 | 168:13,13 | 153:20 162:18 |
| listening 184:3 | 235:11 | Mahoney 63:1,5 | 207:10 215:2 | 163:5,21 165:7 |
| lists 122:18 | looked 18:22 | 63:10,20 64:20 | 229:14 235:15 | 165:8,9 170:14 |
| 177:9 | 50:17 93:21 | 65:4,9,22 | matters 237:9 | 170:17 173:3 |
| litany 75:18 | 98:16 100:23 | 74:14 | Matthew 63:1,5 | 174:3 178:5 |
| literally 19:13 | 172:3,7 197:1 | mail 135:18 | 63:10 | 180:2 185:18 |
| literature | looking 17:23 | mailbox 169:3 | maximum | 191:21 196:9 |
| 219:14 | 18:10 33:6 | main 157:21 | 213:23 214:2 | 197:1,9 201:9 |
| little 27:3 31:10 | 54:16 63:2,9 | 188:9 | 215:6,13,13,17 | 201:13 202:4 |
| 39:3 54:8 | 64:22 95:3 | majority 34:3 | 216:2 219:16 | 203:21 207:14 |
| 99:22 110:17 | 96:7 100:14,15 | 34:21,23 | 219:16,20 | 210:22 211:23 |
| 165:10 167:2 | 100:16,18 | making 57:2 | 223:18 225:15 | 215:3 225:23 |
| 182:8 201:20 | 119:7 122:11 | 69:7 116:7 | 226:22 227:13 | 226:1 230:10 |
| 204:15 206:9 | 178:24 180:2 | 139:20 140:18 | 227:17,22,24 | 231:6 |
| lived 43:6 | 193:13 194:16 | 159:1,16 | 228:9,9 | meaningful |
| LLC 2:12 | 215:6 225:3,12 | 170:10 171:17 | 158:3 | 158:3 |
| local 5:8 | 226:18 | 195:4 221:19 | means 14:14 | 47:20 77:12 |
| locations 23:18 | looks 67:8 | 230:6 | 144:21 189:9 | 144:21 189:9 |
| 23:18 24:11 | 171:21 174:4 | males 34:16 | mean 17:10 | 215:7 234:5 |
| Loevy 2:2,2 5:22 | lost 70:2 166:5 | man 64:2 | 19:15 23:2 | 235:9,11 |
| 10:22,22 11:3 | 181:3 | manner 188:17 | 25:3 28:13 | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 257

| | | | | |
|---|---|--|--|---|
| meant 169:7 170:1,2,11,18 171:4 | 189:2,10 methodologies 44:15 | 31:14 Monico 2:12 6:4 | natural 207:19 nature 78:7 | NOLAND 2:17 normal 187:15 215:23,23 |
| measure 36:20 44:22 77:3 78:22 79:20 80:5 82:13 99:24 | methods 44:17 75:13 | Monroe 3:2 month 30:8 162:19 | near 16:11 115:8 | Norris 225:5 North 2:2 5:4 northern 1:2 5:13 16:8 43:4 43:6 107:21 |
| measures 36:20 81:13 104:21 | Michigan 2:7 155:22 | months 173:8 176:21 6:5,7,23 26:21 | necessarily 93:19 164:4 | Northwestern 132:13 134:7 134:12,17 |
| medical 7:5 71:3 71:8,14 72:7,9 72:20,22,23 86:13 178:19 | middle 150:2 milestones 111:2 | 74:10 motivated 225:12 | necessary 42:8,9 42:16 45:5,18 46:2,5 64:19 65:21,24 83:18 | Notary 1:17 237:2 238:11 |
| medicine 7:12 | mind 170:15 210:13 | mouth 129:18 | need 16:3 20:10 45:4 51:13 | notes 176:24 177:4,6,18,21 |
| meet 30:15 111:2 | minimal 210:24 | Moving 114:4 | number 6:24 22:18 33:21 | |
| meeting 134:20 135:1 | minimum 214:5 216:19,22 217:1 227:21 | multiple 26:22 27:14 122:16 141:16 142:15 | 43:14,15 92:20 | |
| members 135:22 226:5,8 | minute 43:21 44:12 56:3 149:20 188:19 | 149:5 168:3,22 169:11,12 170:4,7 215:8 | 79:9 90:14 96:15 114:12 | 107:9 112:21 |
| memorize 50:1 | minutes 13:6 | murder 68:13 173:13 | 129:10,24 141:24 144:3 | 115:8 121:22 |
| memory 18:11 66:2 | mischaracteri... 84:11 101:11 139:23 148:19 201:5 | mute 190:10,13 N | 162:23 163:3 172:3 177:6 203:24 232:10 235:22 236:12 | 130:6 154:15 166:5 177:5 196:7,17 215:13 |
| men 34:12,21,24 | misdemeanor 33:9,13,23 34:1,9 | name 5:1 6:13 6:23 13:13 26:8 30:13 40:14 63:1 101:21 102:3 110:5 181:18 | needs 75:19 77:11 | numbers 36:10 124:15,20,24 161:9 196:10 |
| mental 73:10 86:12 101:19 101:20 102:8,9 102:10 103:9 103:13 104:8 | misheard 206:11 | neutral 137:5,12 | neither 87:2 neutral 137:5,12 | 199:7 206:5 |
| mention 116:10 169:11 187:5 | misspoke 9:16 209:13 | never 37:22 39:16 45:10 46:13,16 67:20 | never 37:22 39:16 45:10 46:13,16 67:20 | numeric 195:6 numerically 203:22 204:1 204:17 |
| mentioned 18:8 52:22 74:19 114:2 115:16 154:14 158:1 182:2 204:5 208:13 209:2 224:4 225:20 226:13 | mitigation 218:1 218:11 | named 166:4 172:10 | 98:12 101:4 102:15 104:23 | numerous 69:12 157:13 |
| mentor 110:9,11 134:9 | mix 126:16 | names 23:9 | 116:18 127:13 | |
| met 132:12 134:6 | mixing 163:20 | narcotics 33:19 54:2 59:1 68:11 105:4 | 127:16,19 136:13 143:7 148:9 177:7 | |
| method 113:10 | mock 18:1 | narrow 44:2 | 230:4 232:1 | |
| | models 197:15 | National 93:22 94:22 98:21 | new 100:11 | |
| | Mohammed 6:10 181:19 | 99:23 100:5 111:6 112:24 | news 130:23 | |
| | moment 29:24 | 189:19,24 | nine 36:15 Nobody's 128:20 | |
| | money 10:11 | | noise 167:1 | |
| | | | | objection 7:23 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 258

| | | | | |
|----------------|------------------------|--------------------------|----------------|----------------|
| 10:8 15:9,10 | 225:16 226:24 | offenses 33:13 | 20:12,15,20 | 138:11 142:20 |
| 15:19 16:17,20 | 227:4 230:19 | 105:14 106:23 | 21:5,10 22:5 | 143:5 144:9,23 |
| 21:13 29:9 | objections 46:9 | 149:24 169:13 | 22:20 23:9,12 | 145:4,18,24 |
| 37:5 38:2,14 | 51:5 52:9,9 | offer 12:7 40:4 | 24:7,11,15,24 | 147:11,18 |
| 39:12 40:6,22 | objective 88:2 | 61:3 62:1 | 25:10,16 26:5 | 149:12,17 |
| 41:9,18 42:11 | 99:24 | 68:15 181:23 | 27:6,14 28:2 | 150:11 151:13 |
| 47:2,14 48:7 | objectively | 182:22 183:17 | 28:16 29:2,16 | 151:23 152:10 |
| 49:1,13 50:12 | 89:16 137:11 | 183:18 194:21 | 31:7,19,24 | 152:13,17 |
| 52:5 53:8,17 | 137:23 | offered 12:6 | 32:5 33:2 34:3 | 153:3,22 154:3 |
| 56:4 57:13 | observation | 65:4 156:4 | 35:2,4,5 36:17 | 154:7,10,20 |
| 58:3 59:3,18 | 109:11 | 184:4 | 40:16,18 43:2 | 157:17 159:3 |
| 61:14 64:5 | observational | offering 63:24 | 43:9 44:12 | 159:14 160:5 |
| 66:9,17 69:14 | 32:20 | 69:7,8 182:11 | 45:18 48:22 | 161:18 162:1 |
| 72:15 75:8 | observations | 200:2 | 53:6,13 54:1,8 | 162:18 165:24 |
| 77:15 81:6 | 26:5 | office 127:12,14 | 58:13 62:4,14 | 166:7,9 167:14 |
| 84:10 85:21 | observe 107:24 | 238:2 | 63:19 67:21 | 167:24 168:8 |
| 87:5 88:9 90:5 | observed 21:18 | Officer 150:17 | 70:23 71:14,19 | 170:13,22 |
| 91:18 101:10 | 21:21 22:9 | 151:2,15 152:1 | 73:15,15 78:17 | 171:9,22,23 |
| 103:1 105:5 | 27:24,24 28:5 | officers 7:1 47:7 | 78:21 82:16,23 | 172:2,6,13,17 |
| 106:7 113:6,21 | 28:8 30:14 | 60:5 127:21 | 85:1,16 88:22 | 172:22 173:17 |
| 126:2 132:7 | 32:21 107:13 | 128:13,18 | 90:16 91:16 | 174:19 175:7 |
| 135:13 137:7 | 107:17 108:6 | 149:23 151:15 | 92:15,16,18,19 | 176:11,14,23 |
| 138:5,17 139:5 | 109:7 114:18 | 164:17 206:17 | 93:16 94:13 | 177:12,17 |
| 139:22 140:20 | 163:23 164:7 | 207:4 208:5 | 95:8,16 96:10 | 179:4,19 180:8 |
| 141:19 142:10 | 189:1,8,13 | officers' 139:11 | 96:24 97:6,9 | 182:16,21 |
| 143:9,24 | 219:19 227:16 | 152:15,18 | 99:5 104:4,18 | 183:6,16 184:2 |
| 144:14 145:8 | observing | 153:5 164:13 | 105:16 106:2 | 184:18 185:7 |
| 147:5,19 | 108:13 | 209:5 211:12 | 106:22 108:19 | 187:4,18 188:3 |
| 148:19 151:4 | obviating 90:13 | OFFICES 2:7 | 108:22 109:1,6 | 188:7,14 189:5 |
| 152:4,20 157:4 | obviously 27:1 | official 98:23 | 109:16,20 | 190:14,16 |
| 168:16 169:20 | 115:20 121:16 | 100:2,10 | 110:4,12 | 191:2 192:1 |
| 173:1 179:23 | 174:3 | officially 93:24 | 111:17,23 | 193:21 194:11 |
| 180:11 184:7 | occur 66:23 | 100:12 | 112:12 113:4 | 194:15 198:10 |
| 184:22 186:1 | 124:11 | oh 106:4 109:23 | 114:4 115:19 | 198:19 199:9 |
| 186:12 191:5 | occurred 94:12 | 131:1 134:18 | 115:22 119:1 | 199:13,21 |
| 193:3 194:23 | 113:5 150:18 | 146:9 171:19 | 120:9,14 | 200:12 201:20 |
| 200:8,18 201:4 | 151:2,16 | 215:10 | 122:10 123:13 | 203:8,16,24 |
| 202:2 203:11 | 152:15,19 | okay 8:24 9:5,6 | 124:7,14,21 | 206:9 207:17 |
| 203:21 205:19 | 153:24 172:19 | 9:16,17,18,21 | 126:9,13,17 | 207:23 212:5 |
| 208:6 209:10 | 176:15 | 10:1,5,15,21 | 127:7,11,15,15 | 212:19 213:10 |
| 210:17 211:15 | offenders 102:8 | 12:1,13 13:2,8 | 128:11 130:6 | 214:20 215:11 |
| 214:15 218:14 | 103:8,13 104:7 | 13:13,23 14:5 | 131:15 132:4 | 215:16 216:10 |
| 220:20 221:6 | offense 103:21 | 14:15,24 15:5 | 133:4,17 | 216:19 217:23 |
| 222:4,18 223:6 | 105:4 130:12 | 15:16 16:1,4,5 | 134:11 135:5 | 218:7,20 |
| 223:21 224:15 | 153:15 | 16:11,14 20:2 | 136:12,24 | 219:12 220:5 |

Ben Baker, et al. v. City of Chicago, et al.
Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 259

| | | | | |
|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| 224:2 226:16 | 61:17,22 62:1 | 156:14 157:13 | 132:16 147:3 | particular 14:12 |
| 229:10 230:3 | 62:2 63:24 | 157:14,15 | papers 17:9,11 | 17:5 71:23 |
| 230:17 232:3,5 | 65:4,15 68:15 | overturned | 32:17,20 33:3 | 111:5 121:19 |
| 234:14 235:4,5 | 69:6,8 73:2 | 137:17 138:21 | paragraph | 123:3 149:7 |
| 235:7,24 236:2 | 76:20 87:14 | 139:17 153:18 | 95:10,10,12 | 193:24 194:8 |
| once 104:19,20 | 88:8 89:1 90:4 | overviews | 115:17,17 | 194:20 200:6 |
| 105:21 201:10 | 90:10 97:7,8 | 121:24 | 116:13 146:19 | parties 14:19 |
| one-year 155:16 | 135:12 142:17 | | 146:19,23 | 15:2 237:22 |
| ones 69:23 81:21 | 150:13 154:17 | P | 147:12 148:4 | parts 32:11 |
| 112:22,23 | 154:20 157:20 | P.C 2:7 | 150:2 151:1,17 | 155:10 |
| 116:5 121:15 | 161:23 177:20 | p.m 120:11,15 | 151:20 165:4 | pass 212:3 |
| 121:17 205:2 | 181:22 183:17 | 166:11,14 | 168:1 184:18 | patterns 37:10 |
| online 148:12 | 201:9 206:12 | 212:10,13 | 184:19 | pay 31:13 |
| 226:3,4 | 206:24 207:7 | 236:5,15 | parameters | peer 121:3,6 |
| open 23:7 | 208:1,19,24 | package 71:23 | 136:16 | peer-reviewed |
| opening 115:17 | 209:7 211:5 | 73:18,20 91:13 | parent 73:23 | 120:20 121:7 |
| operations 54:2 | 213:6 231:22 | 118:12 154:14 | parroting 180:9 | 121:17,22 |
| operator 5:3 | 234:22 235:3 | 154:21 155:24 | part 27:15 32:11 | 123:4 |
| opine 50:5 170:3 | opportunity | 156:4,12,20 | 44:24 73:11,11 | penalty 145:20 |
| opining 84:23 | 127:19 128:20 | 157:3,9 163:4 | 73:13 78:10 | 146:1 218:4 |
| opinion 51:10 | 235:8 | 163:10 166:2 | 81:14 85:9 | 232:8,13 |
| 53:4,4 55:10 | opposed 73:12 | 191:16 202:14 | 111:11 116:12 | 234:24 |
| 59:14 60:16,18 | 84:19 121:12 | page 56:15 | 118:15 119:7 | pending 219:3 |
| 61:3,5 64:10 | 121:24 | 94:15 95:9 | 122:13 137:3 | 229:14,17,22 |
| 70:24 71:22 | optional 114:20 | 96:7,11,20,21 | 141:1 161:13 | penitentiary |
| 85:5 86:22 | order 23:17 37:3 | 97:2 107:8 | 179:8 193:12 | 222:2 |
| 89:5,13,17 | 155:16 | 111:23 112:1 | 205:17 207:3 | people 21:6,15 |
| 138:14 140:22 | ordering 236:8 | 122:12,18,20 | 207:19 208:3 | 25:7 27:12,13 |
| 140:23 141:2 | 236:10 | 123:2 136:21 | 208:13 210:1 | 27:15 28:1,1 |
| 143:3 160:15 | original 33:10 | 140:9 145:19 | partially 125:16 | 28:22 29:13 |
| 182:3,22 183:8 | 153:13 216:11 | 146:9,10,10 | participant | 30:4,7,10,21 |
| 183:18 185:9 | 216:16 219:7,9 | 149:2,8 162:3 | 31:4,12,15,20 | |
| 185:12,15 | originally | 167:22 179:5 | 33:7,8,12 | |
| 200:2 208:11 | 215:14,15 | 190:15 232:7,8 | participants | 42:20,22 44:4 |
| 220:8 227:18 | outcome 237:24 | 232:10,10,17 | 18:16 19:20 | 44:16,20 69:24 |
| opinions 12:21 | outcomes 206:4 | pages 95:18 | 20:7,12,24 | 74:22 80:2 |
| 12:23 40:1,2,1 | outlined 191:15 | 96:24 122:17 | 21:1 43:15 | 87:1 93:23 |
| 42:7 48:19 | outset 113:10 | paid 12:23 13:20 | 226:3 | 94:21 98:1,2 |
| 50:11 51:3 | outside 31:21 | 13:23 14:3 | participate | 98:10,16,17,18 |
| 52:3,21 54:14 | 133:2 136:7 | 31:7,12,17 | 29:13 31:7 | 99:1,10,15 |
| 55:5 56:13,14 | overall 97:3,6,7 | 110:19,21,24 | 204:24 | 101:7,18,20 |
| 56:16,17,18,22 | 161:22 165:4 | 111:1 124:4 | participated | 102:9,13 |
| 56:23 57:2,12 | 184:12 | panel 189:19 | 32:2 | 105:13,13 |
| 58:1,14 59:2 | overlap 91:3 | paper 32:13,17 | participating | 112:9 113:3 |
| 60:14,24 61:10 | 92:14,17 | 33:5 95:13 | 18:10 31:2 | 116:21 117:4,7 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 260

| | | | | |
|------------------------|-------------------------|---------------------------|----------------|------------------------|
| 118:7,8,19,21 | 84:16 | 175:4,9 | 92:1,11,24 | 220:10 221:2 |
| 119:15 121:8,8 | perform 36:17 | photos 133:24 | 94:1,16 97:10 | 221:16 222:15 |
| 130:2 133:2 | period 20:13 | phrase 149:14 | 97:11,18 98:19 | 222:24 223:3,4 |
| 135:1 142:22 | 25:4 | 231:2,11,15,15 | 99:16 100:1 | 223:12 227:15 |
| 142:23 156:2 | perjury 145:20 | 231:17 | 102:19 103:23 | 228:1,5,9 |
| 156:10 157:2 | 146:1 232:9,13 | picked 130:7 | 104:1 108:9,10 | plead 29:17,17 |
| 157:21,22 | 235:1 | picture 59:24 | 108:18,23 | 68:21 91:9 |
| 158:21 159:3 | permission | pictures 133:18 | 109:1,7 113:11 | 93:4,14,15 |
| 159:11,19,21 | 30:11 | piece 32:13 | 113:12 114:6 | 99:10 103:15 |
| 159:22 160:7,8 | persist 54:5 | place 26:6,18,18 | 114:20,21 | 104:13 105:20 |
| 160:9,11 161:5 | person 25:12 | 90:14 | 115:1,1 116:9 | 113:3,14 |
| 161:6,14 190:3 | 27:1 30:2 | plaintiff 14:12 | 116:17 117:8 | 116:24 117:1 |
| 197:2,5,13 | 32:12,13 44:1 | 125:11 127:6,7 | 117:12,13,17 | 118:8,19,21 |
| 198:22 199:5 | 45:16 67:20 | plaintiffs 1:6 2:5 | 117:20 118:12 | 120:19 155:2 |
| 201:10 208:15 | 87:9 90:18 | 2:11 5:23 6:1 | 118:13 119:4 | 155:17 156:15 |
| people's 23:9 | 91:6,8 92:21 | 128:8 136:3 | 124:10,18 | 156:16,20 |
| 70:14 199:8 | 92:24 93:4,13 | plaintiffs' 61:11 | 125:16,21 | 158:5 159:21 |
| perceive 91:14 | 93:15 94:11 | 185:16 200:3 | 126:5 141:1 | 160:8,9,12 |
| 157:23 | 100:12 109:4 | 200:16 211:3 | 142:23 143:12 | 161:6,16 |
| perceived 82:13 | 113:14,17 | planning 229:1 | 150:19 152:7 | 184:13 192:3,8 |
| 223:8,16 | 121:7 126:6 | planted 47:8 | 153:7 154:5,6 | 192:21 194:5 |
| percent 27:23 | 143:8 156:15 | plea 8:16,21 | 154:15,16,21 | 197:5 198:24 |
| 31:16 34:1,7 | 156:16,20,21 | 21:19,21 22:9 | 154:22 155:24 | 199:5 201:12 |
| 35:1 81:16 | 157:1,10 159:7 | 22:12,13,14 | 156:4,4,11 | 202:23 204:13 |
| 116:8 117:3,3 | 159:18 175:15 | 26:2,20 28:7 | 157:3,9,23 | 221:2,3,4 |
| 117:7 130:5 | 194:5 196:1 | 30:6,9,14 31:4 | 160:14,18 | 228:12 229:24 |
| 160:19,22 | 201:17 202:21 | 31:5 32:22 | 161:3,8,12,13 | 230:5,10,12 |
| 163:15,15,16 | 202:23 203:5 | 33:7,12 36:19 | 162:5 163:4,10 | pleading 68:2 |
| 186:16 195:7,8 | 218:21,23 | 45:20 48:15 | 164:20 166:2,3 | 74:11 75:6 |
| 195:9 196:13 | 219:17 225:9 | 54:17 61:8 | 168:24,24 | 108:8 159:4,8 |
| 196:18,22 | 225:12 228:8 | 68:22 70:10 | 169:7 173:16 | 159:19 160:7 |
| 213:12,13,19 | person's 68:6,17 | 71:24 72:1,4 | 182:23,24,24 | 193:10 198:22 |
| 214:8,11 | 73:12 97:10 | 73:18,18,21 | 184:11,15,20 | 202:21 203:18 |
| 217:10 219:5 | 223:16 | 74:2,7,7 75:1 | 185:10,23,23 | 213:14 228:16 |
| 223:10,11 | personal 237:13 | 75:23 77:3,11 | 186:5,11,11,23 | pleads 112:6,16 |
| percentage | personally 44:5 | 79:20 81:5,14 | 186:24 187:15 | 113:11,17 |
| 27:21 130:3 | persons 32:6 | 81:15,18,24 | 188:5 189:10 | 114:5 115:23 |
| 204:5 206:5 | pertaining 1:15 | 82:5,6 84:2,14 | 191:17,24 | 190:19,23 |
| percentages | Ph.D 1:12 4:2 | 84:15,24 86:18 | 194:1,8,22 | 194:20 |
| 190:7 204:6 | 6:18 7:9 16:23 | 87:4,8,8,12,15 | 195:10 196:1 | pleas 24:20 |
| Percentagewise | 17:3,8,12,20 | 87:17,22 88:1 | 201:3 202:14 | 26:17,18,22,24 |
| 203:22 | 20:19 111:3,14 | 88:2,7,23 89:6 | 208:16,22 | 27:3 33:18 |
| perception | 230:23,23 | 89:14,16,20,21 | 213:15,23 | 38:21 42:23 |
| 225:13 226:20 | phone 129:17 | 90:3,17,20 | 216:1 219:15 | 44:1,7 46:7 |
| perceptions | 148:10 174:9 | 91:1,2,13,17 | 219:19 220:3 | 54:20 55:7 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 261

| | | | | |
|-------------------------|--------------------------|-------------------------|-------------------------|------------------------|
| 56:24 57:6,8 | pled 25:7 28:23 | 47:8 60:5 | 171:13 | privileges |
| 58:16 67:23 | 29:7,19,24 | 141:4 149:23 | prepare 17:9,10 | 175:17 |
| 69:8,11 74:22 | 30:23 33:7,9 | 150:22 158:8,9 | 62:8 171:12 | probability |
| 75:14 85:18 | 33:13,23 34:5 | 164:13 172:9 | 205:24 226:8 | 186:22 193:23 |
| 89:19 90:24 | 34:9,9,12,22 | 206:17,21 | prepared 62:7 | 194:18 197:21 |
| 91:4 92:6,6,14 | 35:16,17 37:2 | 207:4 208:5 | prescribe 7:12 | 206:7 223:9 |
| 92:16,17,18 | 43:5,11 44:5,8 | 209:5 210:14 | present 3:1 5:19 | 227:12 |
| 94:2,8 97:22 | 44:16,20 57:4 | 211:11 | 61:6 170:2 | probably 78:19 |
| 97:22 98:3,5 | 62:21 64:1 | pope 164:11 | 183:24 184:14 | 87:22 108:16 |
| 98:11,13 99:1 | 68:12,12,13 | portion 29:1 | 192:17 210:8 | 125:5 178:11 |
| 99:6,11 100:24 | 69:2 74:10 | 30:5 36:13,13 | 211:24 | 221:15 |
| 101:3 102:8 | 81:12,17 86:16 | 72:19 | presented 19:10 | probation 73:21 |
| 106:18,23 | 101:9 102:13 | portions 177:24 | presume 88:20 | 97:15 155:3,16 |
| 107:2,6,9 | 103:14,21 | 178:15 | 98:18 99:9,17 | 160:24 163:11 |
| 111:20 112:3 | 104:6,16,17,18 | positions 112:2 | 198:24 | 219:7 |
| 112:11,19,20 | 104:20 105:3 | 117:24 | presumed 101:6 | probationable |
| 112:21 113:4 | 105:15,18,22 | possessed 57:23 | presuming 99:1 | 216:13,16 |
| 113:13,19 | 106:4 116:21 | 60:13 | presumption | 217:13,16 |
| 114:1 115:15 | 117:7 126:7 | possessing 57:11 | 191:9 203:6 | 219:8,11 |
| 117:22 118:8 | 159:23 164:2 | possession | pretty 134:15 | 222:12 |
| 121:21 122:23 | 191:3 214:5 | 216:23 | 165:15 189:2 | probationary |
| 123:21 124:2,5 | 220:19 | possibility 58:8 | 209:20 224:10 | 222:3 |
| 124:16 125:1,5 | plural 63:4 | 58:11,13 | prevent 38:11 | problems 73:10 |
| 125:8 153:24 | plus 216:7,7 | 185:22 195:23 | preventing | 86:13 101:19 |
| 154:12 157:14 | 221:15 | possible 108:2 | 38:18 46:13 | 101:20 102:10 |
| 157:15 162:4 | podcast 136:9 | 108:12 155:8 | prevents 39:7 | 102:11 |
| 162:10 164:21 | 139:12 178:20 | 155:23 | 46:5 | procedure 1:14 |
| 166:17 182:12 | 180:3,10 | possibly 226:23 | previous 195:19 | 5:7 215:23 |
| 182:13,13 | point 18:12 80:1 | 228:14 | 237:6 | proceeded 155:9 |
| 183:9,9,10,20 | 83:23,24 | post 30:6 133:16 | previously 68:7 | proceeding 57:3 |
| 183:23 184:6 | 103:18 105:16 | 134:1 | 127:8 128:8 | 63:8 107:17 |
| 185:17 187:7 | 112:5,7,15 | post-doctoral | primary 17:15 | 123:20 127:17 |
| 189:2,12 200:3 | 115:22 152:14 | 111:13 | printout 19:10 | 128:5,9 141:17 |
| 200:7,16 | 157:18 158:24 | postbaccalaur... | prior 67:23 68:1 | 153:4 229:18 |
| 201:11 202:5,7 | 159:16 168:20 | 110:16 | 68:11 70:14,20 | 229:22 |
| 202:8,10 | 176:8 177:18 | posts 133:20 | 168:4 170:20 | proceedings |
| 204:19 206:6 | 182:1 183:6 | potentially | 172:18,19,23 | 22:8 25:7,12 |
| 208:20,23 | 185:14 193:8 | 192:22 | 176:15 191:19 | 26:15,15 |
| 210:10 227:10 | 212:2 213:4 | pre- 30:6 | prison 72:21 | 107:14 108:1,7 |
| please 5:19 6:12 | 216:9 223:15 | pre-2006 69:2 | 73:24 74:1 | 126:14,15,17 |
| 6:15 11:12,13 | 223:23 226:11 | precise 206:5 | 97:14 143:15 | 127:24 189:1 |
| 17:11 41:12 | 230:22 | predictive 70:15 | 143:17 | 212:15 237:15 |
| 55:15,16 62:13 | pointing 74:16 | prejudicial | pristine 116:17 | process 30:20 |
| 70:4 129:1 | points 152:24 | 68:19 | private 23:13 | 44:24 121:2 |
| 212:7 229:8 | police 7:1 47:6,7 | preparation | 30:16 220:18 | processing |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 262

| | | | | |
|------------------------|-------------------------|---------------------------------|-------------------------|-------------------------|
| 194:10 | psychologist | 23:24 26:13,13 41:6,10,11,17 | questionnaire | ranges 206:3 |
| proclivity 70:8 | 37:22 38:8 | 41:20 42:15 | questions 9:8,9 | rap 47:24 69:20 |
| produce 14:10 | 230:2 | 49:18 50:3,24 | 9:22 14:23 | 171:20 173:11 |
| produced 11:7 | psychology 7:9 | 52:11,15 54:6 | 32:10,11,14 | rate 210:9 |
| product 11:7 | 17:4,5,6,7 | 54:22 55:5,11 | 33:15 35:20,21 | rates 18:22 |
| 130:15 | public 1:17 23:7 | 55:13,14,21,24 | 45:2,12,17 | 106:17,18 |
| proffered | 237:2 238:11 | 56:5,6,8,10,20 | 51:22 63:23 | 198:22 |
| 150:21 | publication | 58:21 59:7 | 64:10 75:16,23 | ratio 223:12 |
| promised 23:4 | 32:23 224:5 | 61:9 65:10 | 76:6,10,23,24 | rational 221:13 |
| 23:19 | publications | 66:1 67:19 | 77:1,7,13 78:1 | 221:14 |
| promises 117:2 | 78:13,14 81:20 | 69:5 70:3 | 78:18,19,20,24 | Rauscher |
| pronounced | 122:2,19 | published 20:11 | 79:3,4,18,22 | 232:18 |
| 40:15 | | 72:10,24 78:7 | 80:18 82:1,5,6 | reaction 18:10 |
| prosecuting | 20:22 21:18 | 79:8 80:10 | 82:12,18,24 | read 11:13,15 |
| 127:12,14 | 23:8 25:14,21 | 88:13 92:9 | 83:2,3,20 84:1 | 41:11,13,19,20 |
| prosecutor | 25:23 26:4 | 93:3 101:3 | 41:20,22 49:21 | 49:22 52:11,12 |
| 127:14 129:4 | 32:17,19,24 | 102:15,24 | 54:22 55:1,24 | 54:22 55:1,24 |
| 150:21 | 33:4 43:16,22 | 103:5,7,20 | 56:5 60:4,6 | 56:5 60:4,6 |
| prosecutors | 93:21 101:17 | 104:3,5,14,15 | 63:7,7 65:7 | 63:7,7 65:7 |
| 127:17 225:1 | 108:15 121:15 | 104:23 105:3 | 70:4,5 72:6,7,8 | 70:4,5 72:6,7,8 |
| protect 155:12 | 121:21 122:23 | 106:3,6 113:16 | 78:24 79:2,8 | 78:24 79:2,8 |
| 155:13 156:2 | 129:22 132:16 | 126:22 127:22 | 79:13 81:20 | 79:13 81:20 |
| protected | 205:6,8 | 131:11 145:12 | 188:20 190:6,7 | 95:11 96:13 |
| 232:24 233:17 | purely 59:21 | 148:2,6 149:8 | 205:24 206:2 | 137:1 139:9 |
| 233:20 234:12 | purpose 80:4 | 165:15 169:14 | 206:10 210:4 | 141:9 142:4 |
| protection 38:3 | 119:5 | 169:16 175:14 | 213:1,9 229:1 | 146:13 147:2 |
| prove 80:19,19 | purposes 37:9 | 178:23 179:17 | questions-type | 149:20 153:3 |
| 192:11 | 81:2 | 183:3 186:18 | 77:23 | 162:16 169:17 |
| proven 208:23 | pursuant 1:13 | 186:19 188:23 | quit 52:8 | 169:17,18 |
| provide 13:20 | 5:7 | 198:14 199:10 | quite 74:21 | 171:12 174:3 |
| 79:9 83:21 | pursued 39:16 | 200:21 204:14 | 79:11 | 178:7 179:5,20 |
| 100:7 121:10 | 39:21 46:13 | 206:24 207:6 | quote 154:24 | 232:12 |
| 135:9,10 | put 70:19,20 | 217:17,21 | 155:19 163:24 | readily 78:14 |
| 150:17 201:1 | 134:21 136:10 | 219:2 222:22 | quoting 150:6 | reading 25:18 |
| 204:9 | 148:3,9 152:17 | 222:22 225:8 | 155:13 | 41:3 63:15 |
| provided 15:21 | 166:21 174:4 | 226:15 232:4 | <hr/> | 75:18 95:2 |
| 30:19 65:7,13 | 196:6 | 232:16 233:2,7 | R | 138:8 144:5 |
| 71:7 72:18 | putting 31:13 | 233:21,23 | radar 189:24 | 170:1,16 |
| 210:3 | <hr/> | 234:3,4,14,17 | raise 6:15 73:22 | 173:10 |
| providing 17:24 | Q | 235:10 | 155:4 156:23 | real 197:24 |
| 125:23 138:14 | qualified 38:18 | questioned | 156:24 163:12 | 198:3 225:13 |
| province 62:3 | 39:4 42:17 | 229:7 | 202:20,22 | real-life 224:13 |
| prudent 65:2,6 | question 8:2,3 | questioning | range 198:15,20 | realize 8:12 |
| Psychological | 9:3 11:12 12:9 | 77:6 173:12 | ranged 28:12 | really 39:24 |
| 155:21 | 12:10 15:13 | 179:14 | | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 263

| | | | | |
|-------------------------|-------------------------|-------------------------|--------------------------|-------------------------|
| 40:2 48:11 | 183:13 187:9 | records 14:1,2 | reflected 174:22 | 182:19 |
| 50:4 67:18 | 187:24 | 31:9 71:1,3,8 | reflects 151:14 | reliable 57:8 |
| 69:20 70:10,17 | receive 91:11 | 71:14 72:7,9 | reforms 219:15 | 68:22 |
| 70:20 78:1,2 | 97:12 156:11 | 72:11,20 83:2 | refuse 46:15 | relied 135:11 |
| 79:5 80:3,16 | 213:24 214:13 | 86:13 178:19 | regard 213:6 | 205:13 |
| 84:8 85:6 | 214:14 217:11 | recovered 59:1 | 233:1 | rely 177:19 |
| 108:3 116:14 | 218:22 219:20 | Redlich 1:12 4:2 | regardless | 199:22 205:17 |
| 116:22 122:24 | 219:22 221:16 | 5:10 6:18,23 | 193:11 217:8 | 207:3 |
| 124:2 128:20 | 221:18 223:17 | 7:4,7 25:23 | registry 93:22 | relying 206:13 |
| 133:22,23 | 223:19,20 | 26:2 28:22 | 94:22,23 98:22 | 208:3 |
| 134:1,24 144:6 | received 10:11 | 35:13 40:1,15 | 99:11,23 100:5 | remember 9:18 |
| 158:7 177:1 | 10:13 16:22 | 40:16 43:12,20 | 112:24 | 13:5 20:1 |
| 181:4 200:12 | 20:18 30:11 | 44:4 50:24 | reiterate 84:21 | 28:13 31:10 |
| 207:5 208:11 | 98:22 135:17 | 54:9 56:11 | reject 121:15 | 49:17,18 50:2 |
| 208:11 209:16 | 137:24 161:12 | 62:20 67:2 | rejected 121:13 | 50:2 101:24 |
| 226:2 228:15 | 214:4,7 215:17 | 77:24 79:17 | relate 115:4 | 129:3 132:15 |
| 231:14 | 219:5,6 220:1 | 80:22 98:20 | related 33:15 | 134:18 141:11 |
| reason 38:7 50:5 | 220:4,6 230:23 | 101:24 102:1 | 39:6 213:7 | 141:13 142:13 |
| 55:20 68:17 | receiving 35:16 | 120:17 135:20 | 224:12 | 144:5 147:16 |
| 89:4,7 90:14 | 138:3 196:12 | 160:1 162:24 | relates 115:14 | 148:5,7,15,23 |
| 103:16 115:14 | 222:2,16 | 166:16 167:21 | 153:6 154:18 | 150:20 151:24 |
| 158:9 194:20 | recess 35:9 | 179:19 181:16 | relation 176:19 | 151:24 152:2,7 |
| reasonable | 62:17 120:12 | 181:16 212:24 | 195:3 214:21 | 152:11 154:13 |
| 192:12 201:16 | 166:12 212:11 | 224:23 225:5 | 228:5 | 157:12 168:12 |
| 207:13 231:3,6 | recitation 151:1 | 229:7,13 234:2 | relative 204:1 | 168:15 172:15 |
| 231:23 | recognize 96:13 | 234:15 235:4,7 | 206:7 237:20 | 173:10,11 |
| reasoning 141:2 | recollection | Redlich's | 237:21 | 174:7 177:7,13 |
| reasons 35:20 | 10:20 31:11 | 175:21 | relatively | 177:15,19 |
| 48:15 66:22 | 108:2 | reduce 217:14 | 181:20 | 179:11 180:2,6 |
| 86:4 95:11 | record 5:1,20 | reduced 237:13 | relevance 48:18 | 180:19 183:14 |
| 107:9,12 | 11:15 35:7,10 | reduces 90:19 | 69:3 | 187:24 199:6 |
| 112:20 113:2 | 41:13,22 52:12 | reduction 219:5 | relevant 48:13 | 227:11 |
| 114:10 115:10 | 55:1 62:15 | refer 107:7 | 50:4 65:8,18 | remind 43:22 |
| 115:12 129:9 | 70:5 79:10 | reference 94:14 | 65:19 66:8 | REMOTE 2:1 |
| 129:13 137:23 | 83:6,9,12,13 | 94:15 169:9 | 68:9 81:22,24 | remotely 6:20 |
| 138:24 155:11 | 120:10,15 | 174:11 184:19 | 112:4 115:16 | render 60:24 |
| 157:21 227:9 | 166:10,13 | referenced | 115:18,20 | 61:22 |
| recall 8:10,11 | 168:4 169:10 | 161:2 179:21 | 118:14,14,15 | repeat 11:12 |
| 20:11 48:11 | 169:18 170:9 | references 153:8 | 173:15 178:6,7 | 36:12,15 70:3 |
| 50:3 71:18 | 171:3 212:9,12 | 153:8 | 191:15 210:6 | 201:21 204:14 |
| 128:22 132:10 | 236:3 237:14 | referrals 130:1 | 224:8,10 | 222:22 |
| 138:8 142:6,7 | recorded 5:17 | referred 117:24 | reliability 27:18 | rephrase 9:5 |
| 142:9 147:1 | 32:14 235:23 | 146:7 188:18 | 54:19 55:7 | 56:7 |
| 168:8 176:19 | recording 5:3 | referring 109:12 | 56:24 58:16,17 | report 8:10 11:6 |
| 180:23 182:1,5 | 167:13 | reflect 14:3 | 156:9 182:19 | 12:7 14:6,8,10 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 264

| | | | | |
|-----------------------|-------------------------|--------------------------|-------------------------|------------------------|
| 14:11,15,18,23 | 181:18 213:3 | 174:1 | 184:2 207:9 | 147:15 149:19 |
| 15:2,5,6,7,15 | 225:11 | responses | 209:4 210:11 | 151:23 152:2 |
| 15:16,21 55:9 | represented 6:4 | 189:16 | reviews 121:18 | 153:14,16 |
| 62:6 74:4,19 | 62:22 63:16 | responsibility | 187:6 | 154:15 156:3,5 |
| 78:15 90:23 | representing | 18:20 19:8 | Ridgell 3:10 6:2 | 156:8,12 157:2 |
| 93:7 94:14 | 129:5,6 | 183:2,4 | right 6:15 7:20 | 157:3,12,14,15 |
| 95:4,4,5,17 | request 38:24 | rest 146:19 | 7:22 9:5,15 | 157:15 158:11 |
| 96:8,13,16,18 | required 227:20 | 203:16 | 10:22,24 11:23 | 158:23 159:12 |
| 96:21,22 98:6 | requires 75:4 | results 19:3 33:3 | 14:16 20:4,13 | 160:9,10 |
| 107:8 111:19 | rescind 99:21 | 166:19 | 22:8 23:7 27:4 | 161:15 162:15 |
| 115:13 117:19 | 208:18 | retain 129:15 | 31:5 35:18 | 163:10 167:21 |
| 122:13 125:19 | research 7:17 | retained 11:3 | 37:14 39:2 | 168:10,11 |
| 125:24 136:21 | 16:24 17:16,16 | 12:14,19 13:10 | 42:20 43:5 | 169:9 170:18 |
| 145:18 146:1 | 24:21 27:10 | 13:17 123:18 | 44:11,21 45:1 | 174:5 176:18 |
| 147:14 151:4 | 29:13 30:19,20 | 125:8,22 | 45:3 46:20 | 177:10 178:24 |
| 151:19 155:10 | 31:2 36:4,22 | 126:18,23 | 48:20,21 49:23 | 180:8 181:11 |
| 159:16 161:3,8 | 37:9 42:21 | 127:1,4 128:3 | 53:4 57:2 | 188:7 189:18 |
| 162:17,18 | 44:14,24 70:12 | 128:7 | 59:12 60:5 | 190:14,20 |
| 165:3,14 | 75:12 76:13 | reveal 174:17 | 63:5,9,13,17 | 191:4,10,12 |
| 167:23 173:7 | 77:1 78:5,10 | review 8:9 10:6 | 63:19 64:3,20 | 192:4,10,12,14 |
| 174:21 179:1,2 | 78:11 79:8 | 23:2 44:23 | 65:15 66:4,6,8 | 192:17,23 |
| 179:6 180:5 | 80:17,17 81:10 | 51:16 61:12 | 66:15,16 67:10 | 193:21 194:11 |
| 181:5 184:2 | 110:14,22 | 64:23 65:3,19 | 71:4 72:8 73:6 | 195:13 200:7 |
| 185:15 187:6 | 111:2,7,20 | 66:8 67:4,21 | 76:1,3,5,6 78:3 | 202:12 203:2,7 |
| 188:17 190:17 | 112:2,8,9,11 | 86:8 96:17 | 79:5 80:6,24 | 206:9 209:21 |
| 194:3 201:23 | 112:15 114:18 | 121:3,6 123:4 | 82:2,20 83:22 | 211:22 216:5 |
| 205:14 206:14 | 116:4,20 | 136:14 139:21 | 85:19 87:23 | 230:14 231:21 |
| 207:1 211:10 | 117:18 118:5 | 148:12 174:5 | 89:9,12,14,23 | 232:3,3,12,15 |
| 231:22 232:4 | 122:1 129:22 | 176:23 178:13 | 90:11,22 92:1 | 233:19 236:14 |
| 234:9,24 | 129:23 155:24 | 207:8,19 | 92:15,20,21 | rightly 98:2,17 |
| reported 3:22 | 158:4 161:2 | 220:12 235:10 | 95:2 96:2,22 | rights 75:18,18 |
| 237:12 | 190:2 199:10 | reviewed 39:5 | 96:24 100:16 | 192:8,22 203:5 |
| reporter 1:19 | 199:11,14 | 47:23 49:19 | 101:8 102:16 | risk 61:5 71:23 |
| 6:11,13 11:14 | 200:24 205:10 | 60:7 61:21 | 103:7 104:22 | 72:2 73:3,4,7 |
| 11:16 15:8 | 231:14 | 64:18 65:18 | 106:6 109:21 | 73:13,16 84:22 |
| 26:7 41:14,23 | reserve 235:9,18 | 71:1,3,15 | 110:2 111:21 | 85:2,4,14 |
| 52:13 55:2,24 | reserving | 72:11 141:8 | 112:6 118:20 | 90:20 91:3 |
| 70:6 120:21 | 235:11 | 169:2 172:14 | 122:14 125:12 | 93:10,12,17 |
| 166:24 167:5 | respect 186:22 | 177:10 178:16 | 126:1,11 | 98:8 154:11 |
| 167:10,14,18 | 188:11 | 179:10 207:6 | 127:24 128:3,5 | 155:14 162:9 |
| 169:19 190:10 | respond 121:11 | 209:22 210:2,6 | 128:9,11,13 | 165:10 166:2,4 |
| 193:15 235:13 | 121:13 133:20 | 211:10 | 132:6 136:22 | 183:22 188:9 |
| 236:8,12 237:4 | responded 76:2 | reviewing 119:1 | 140:2,13,16,19 | 188:10 191:20 |
| Reporting 6:14 | 76:4 | 119:6 121:9 | 141:6 143:17 | 191:21,23 |
| represent 6:24 | response 49:18 | 177:12,17 | 145:22 146:2,5 | 202:15 206:13 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 265

| | | | | |
|-------------------------|-------------------------|-------------------------|-------------------------|------------------------|
| 208:12 210:8 | 77:22 80:2,7,9 | 38:21 80:17,19 | 71:15 72:10 | 30:8 155:15 |
| 219:17 227:17 | 80:20,22 81:1 | 111:6 112:11 | 73:1 84:2 85:2 | 164:3 218:10 |
| 228:10,15 | 85:5 88:21 | 199:11,14 | 85:14,18 86:12 | 222:17 |
| risk/benefit | 89:6,15 92:13 | 200:13,23 | 86:14 97:2,4 | sentences 95:12 |
| 228:16 | 93:9 97:23 | 201:11 | 100:21 119:17 | 95:14 146:18 |
| risk/reward | 98:15 99:4,9,9 | sciences 231:9 | 143:1 145:18 | 146:20 213:13 |
| 193:2 | 99:14,21,22 | scientific 231:3 | 145:19 146:4 | 214:23 215:19 |
| rolling 167:17 | 106:3,13 114:8 | 231:7,23 | 150:5 153:12 | 219:24 227:13 |
| 167:18,19 | 115:11 116:6 | scientist 16:15 | 162:2 168:6 | sentencing |
| Ron 135:22 | 116:23 117:4 | 16:19 31:24 | 172:5,11 | 214:22 215:22 |
| Ronald 3:5 | 131:9 138:23 | 230:14,18 | 174:11 181:5 | 217:6,19 |
| rooms 30:15 | 140:11,14 | 231:10,18 | 183:21 212:19 | 218:18 221:23 |
| Royal 6:14 | 149:22 152:24 | scientists 121:4 | 226:11 232:7 | separate 26:15 |
| rule 38:3 116:17 | 157:7 159:14 | 121:5 231:17 | seeing 85:3 86:3 | 124:20 |
| 175:18 176:5 | 159:16 160:5 | scold 55:20,23 | 172:15 173:10 | September |
| 232:24 233:17 | 161:11 171:2,3 | scolding 55:22 | 173:11,11 | 45:20 46:8 |
| 233:20 234:12 | 180:9 194:3,10 | scope 175:13 | 229:10 | 62:22 69:9 |
| rules 1:14 5:7,8 | 209:13 210:2 | Scott 232:18 | seen 26:23 | 87:13 88:7,24 |
| 9:1 115:15 | 211:20 216:9 | screen 171:15 | 132:14 | 90:3 154:1 |
| rulings 196:19 | 219:4,7 227:8 | script 79:13,15 | self-admitted | 168:24 |
| run 132:17 | 228:2,6,7 | scroll 123:1 | 48:6 53:6 | Sergeant 69:24 |
| 214:23 216:6 | says 52:6 63:2,3 | scrolling 134:2 | self-report 77:8 | 70:1 139:18 |
| 236:5 | 63:10 97:3 | se 183:21 | Self-Reported | 150:1,2 158:16 |
| running 167:3 | 99:19 111:23 | Sean 6:9 181:18 | 102:7 | series 36:10 |
| 215:18 | 136:22 137:2 | 212:1 | selling 143:21 | 79:21 188:20 |
| Rutgers 132:15 | 164:9 | search 148:23 | send 121:6 | serve 136:18 |
| S | | searched 148:17 | 205:5 | services 129:15 |
| s 4:8 63:11 | SCAHILL 3:7 | seated 18:9 | sense 39:18 | serving 8:20 |
| said/she 207:20 | scale 101:16 | second 101:24 | 69:21 | 123:10 |
| sample 31:16 | 187:1,2 | 146:6 171:22 | sentence 95:15 | session 31:22 |
| 82:9 102:10 | scales 32:11 | 232:6 | 95:15 137:1,5 | sessions 19:15 |
| 116:9 | scandal 137:4 | seconds 236:7 | 146:7,12,15 | set 35:19 94:23 |
| sands 181:3 | 146:8,8,15,17 | section 97:3,7 | 147:13 165:6,8 | 100:10 190:12 |
| sat 30:14 | 179:8 | 112:8 115:18 | 170:21 179:20 | 196:17 238:1 |
| satisfied 189:16 | scenario 226:23 | 116:3 118:5,11 | 180:17 181:10 | setting 30:16 |
| satisfy 23:23 | 228:13 | 118:15 136:22 | 191:17 213:16 | 42:21 224:13 |
| saw 71:12 | Schneider 224:7 | 149:10,17 | 213:18 214:2 | seven 36:14 |
| 108:18 172:14 | scholarship | 153:23 154:5 | 215:6,17,23 | shadow 195:5 |
| saying 49:24 | 132:14 | 154:11 161:2 | 216:2 217:20 | 196:10 197:14 |
| 51:12 54:5 | school 86:15,20 | 161:19 179:6 | 218:2,22 219:5 | 197:16 221:11 |
| 55:7 56:19 | 87:3 110:9,18 | see 26:4 28:12 | 219:20 221:15 | 224:19 225:4 |
| 60:18,20 61:23 | 132:13 | 30:2 37:1 | 222:2,3 223:12 | share 136:9 |
| 63:10 65:16 | school-aged | 38:19 45:4 | 223:12,13,18 | shared 133:5 |
| 67:2,5 68:21 | 73:24 163:13 | 46:19 56:1 | 228:10 | 143:22 222:1 |
| | science 16:23 | 65:8,21 71:12 | sentenced 30:4,7 | sheet 47:24 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 266

| | | | | |
|-------------------------|------------------------|-------------------------|--------------------------|--------------------------|
| 69:20 171:20 | 135:2 | 140:24 143:10 | specialty 17:5 | spoke 43:2 |
| 173:10,11 | situation 73:13 | 144:3 146:9 | specific 26:1 | 54:19 55:9 |
| short 62:17 | 155:18,20 | 147:16 150:10 | 36:2 38:5 | 67:13 |
| 77:23 194:17 | 156:19 157:8,8 | 159:24 161:22 | 68:20,22,23 | spoken 43:12,14 |
| 212:2,6 | situational | 163:22 164:18 | 70:2 82:9,10 | 44:5 67:20 |
| shorter 33:12,14 | 71:22 73:4,12 | 168:23 169:20 | 86:4 97:18,20 | 76:16 |
| 97:14 | 73:16 85:4 | 174:17 176:10 | 98:1,9,15 | stamps 171:17 |
| Shorthand 1:19 | 93:10,12 98:7 | 185:4 193:15 | 101:19 103:9 | stand 36:21 |
| 237:3 | 159:17 162:8 | 198:13 202:7 | 103:20 105:11 | 229:19 |
| show 78:2 | 208:12 | 204:14 205:9 | 106:11 122:17 | standard 30:20 |
| 171:14,15 | six 27:11,12 | 209:24 210:10 | 133:24 151:17 | 75:23 187:6 |
| 173:22 174:2 | 36:15 124:6,6 | 212:1 215:4,10 | 151:20 163:6 | 189:3 190:9 |
| showed 166:19 | 124:6,15 125:1 | 226:24 | 164:5 170:5 | 207:13 216:1 |
| shower 167:4 | 125:7,14,15 | sort 23:13 46:18 | 173:16 174:14 | standardized |
| showing 96:3 | 176:21 214:4,8 | 71:17 187:6 | 177:6 187:10 | 32:11 44:22 |
| shown 18:16,19 | 216:19 | sound 40:15 | 189:13 199:7 | 83:3 |
| 75:12 158:4 | six-year 214:10 | 128:24 129:7 | 204:4 218:4 | standing 64:3 |
| shows 227:2 | slightly 163:8 | sounds 79:3 | 225:8 227:13 | 194:2,7,12 |
| side 129:2,2 | smart 67:7 | 83:19 136:7 | specifically 21:7 | stands 68:23 |
| 149:18 211:3 | social 121:4 | 167:3 175:22 | 23:20 76:15 | start 122:20 |
| sign 18:20 | 199:11,13 | source 137:14 | 79:21 84:14 | 162:7 203:23 |
| signature 96:21 | 200:23 231:17 | 146:22 154:7 | 110:14,24 | started 34:6 |
| 235:8,17,18 | socialized | 179:15 180:20 | 152:7,11 162:6 | 125:5 |
| 236:1 | 132:24 | 181:8 | 165:3 176:8 | state 1:18,19 5:8 |
| signed 15:17 | societal 199:16 | South 2:7,18 3:7 | 191:22 213:6 | 106:23 184:19 |
| 96:22 | solemn 74:20 | space 190:12 | 213:16 215:21 | 189:19 190:1 |
| significant | somebody 47:19 | span 36:3,8 | 216:3 | 215:21 218:6 |
| 70:11,18 80:11 | 51:11 73:23 | speak 31:22 | specifics 48:11 | 237:3,4 |
| 190:7 | 113:11 131:2 | 38:19,24 42:3 | 73:20 118:6 | stated 38:7 |
| significantly | 138:24 201:12 | 42:9,18,20,22 | specified 237:18 | statement 18:20 |
| 33:12,15 | 201:14 225:10 | 58:15 63:20 | spectrum | 19:2 118:24 |
| signing 19:1 | someone's 7:14 | 64:2,15,20 | 218:22 | 137:11,12 |
| similar 76:22 | 92:1 167:3 | 79:19 83:18 | speculation 40:7 | 180:5,6,19,20 |
| 99:12 163:9 | soon 20:21 84:1 | 86:23 134:23 | 47:15 48:8 | 180:24 181:2,5 |
| 180:4 181:6 | sorry 15:8,14 | 158:19 | 49:2,14 53:18 | 181:6,7 183:16 |
| 193:1 199:14 | 26:1 27:20 | speaking 37:1 | 57:14 58:4 | 190:17 191:1 |
| simple 148:2 | 30:5 31:10 | 38:11 39:8 | 59:22 85:22 | statements |
| simply 116:6 | 40:8,16 51:6 | 46:6 52:8 | 91:19 144:16 | 141:3 209:16 |
| single 65:17 | 61:4 70:2 78:6 | 72:13 76:3 | 205:20 208:7 | states 1:1,14 |
| 116:14 147:13 | 78:10 83:4 | 84:14 102:23 | 210:18 211:16 | 5:12 107:3 |
| 223:15 | 90:19 92:12 | 129:3 182:19 | 222:5 | 113:5 217:3 |
| sir 29:24 | 103:10 106:20 | 206:20 | spell 26:7 | 218:4 |
| sit 108:5 142:6 | 117:11 120:21 | speaks 57:5 | spend 130:11 | status 98:23 |
| sites 23:4 | 126:20 128:1 | 70:10 151:5 | spent 80:11 | statutory 219:16 |
| sitting 26:24 | 129:6 130:12 | 169:21 | 177:5 187:18 | 220:3 228:10 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 267

| | | | | |
|---|--|---|---|--|
| stay 73:22 155:3 155:3 163:12 | 99:7,8 101:14 102:5,12,16,17 | 226:10,17,23 227:2 | 209:3,19 211:8 211:21 212:3,8 | 222:21,24 226:12 227:7 |
| stenographica... 237:12 | 102:22 103:19 114:23 116:19 | subfactors 209:1 | 224:22 236:14 | 228:23 234:5 235:12 |
| step 62:7 103:10 149:9 217:8 | 120:17,19 121:3,20,23 | subject 36:9 182:10 225:9 | 100:7 122:1 | surprising 116:11 117:5 |
| stepping 136:7 | 159:20 196:16 | subjects 23:2 35:15 44:23 | 140:23 | surround 219:15 |
| Steve 6:2 132:13 | 196:20,24 | 224:13 | 161:20 | surrounding 69:24 |
| STEVEN 3:9 | 197:4,17 198:3 | submit 121:5 | summary 97:3,6 | survey 226:19 |
| stock 196:7 | 198:5,6,8,14 | submitted 10:3 10:12,18 | 97:7,8 161:23 165:4 184:12 | surveys 32:7 190:3 226:4 |
| stop 55:15 162:5 | 199:7,8,22,22 | 155:21 | Summers 102:1 | swear 6:12 |
| stopped 47:6 | 200:13 204:5 | subpoena 174:1 | supports 112:2 | sworn 6:17,20 237:8 |
| story 211:12,13 | 204:22 205:12 | substance 216:24 | supposed 8:1 74:8,9 225:10 | system 34:24 103:17 112:3 |
| straight 177:2 | 205:16 223:24 | substantive 235:14 | Supreme 74:19 155:22 | 160:12 |
| straightforward 165:15 | 224:6,10,11,18 225:8,19,22 | suburb 16:8 | sure 9:21 12:10 | systematic 109:11 114:10 115:14 |
| Street 2:2 3:2,7 5:4 | 226:3,6,8 227:14 228:3,7 | success 193:23 | 18:4 22:19 | systematically 22:9 32:21 |
| strike 10:16 26:13 35:14 | study 18:10 19:5 19:12,19 20:8 | suffers 71:16 | 24:22 25:15,15 | T |
| 46:22 48:4 49:9 67:24 69:4,4 71:2 82:17 83:16 84:5 101:5 123:5 124:23 131:12 178:14 193:9 199:24 229:15 | 20:11,16,22 21:5,20 22:2 23:17,23 25:1 29:19 31:8 32:3,17,20 33:1,3,18,22 34:11 36:2 37:3 43:3,7 82:10 93:20 | sufficient 61:21 61:24 65:14,17 74:24 80:24 81:2,3 114:6 115:11 119:14 176:12 | 25:19 27:18,22 33:5 47:18 48:3 49:5 56:15 59:9,14 60:16 77:18 80:4 89:24 | table 135:2 tactical 135:22 tails 233:11 take 16:3 19:8 19:12 26:18,18 34:19 35:2,3 40:3 43:21 44:12 55:19 62:7,10 67:18 69:17 82:14,19 83:6,20 103:10 112:20 118:5 119:15 120:3 123:1 130:12 130:13 144:20 145:7 149:9,20 153:22 155:9 161:14 162:23 |
| strokes 18:17 | 94:6 97:20,24 | suing 7:2 128:12 | 119:21 121:4 | |
| student 16:24 110:16 111:1,7 | 98:1,9,15,19 99:5,12,13 | Suite 2:7,13,18 3:2,7 5:5 | 122:7 134:16 140:4,7 142:1 | |
| 132:12 134:14 | 100:13,17 | Sullivan 4:4 6:9 6:9 167:2 | 142:18 146:21 151:24 162:1 | |
| students 18:7,24 109:14,15 110:5,6,9,10 110:10,15,21 111:10 226:6 | 101:15,17,21 102:3 103:8,12 103:13 104:7,9 104:9,11,12 105:12 107:19 | 181:15,18 184:17,24 185:6 186:8,17 190:11 191:11 | 162:15,22 165:1 171:19 176:22 178:18 181:7,21 | |
| studied 23:10 | 108:14,15 | 193:7,20 | 183:13 185:9 | |
| studies 21:10,15 21:17 24:19,20 | 110:24 111:5 114:19 119:3 | 195:11 200:11 | 186:19 191:1 | |
| 24:22 32:20 43:16,22 70:16 | 122:5 166:19 205:12,16 | 200:22 201:19 202:11 203:15 | 196:8 200:21 200:23 204:16 | |
| 77:1,5 80:12 | 208:14 223:15 | 203:23 204:8 | 207:5,14 211:9 | |
| 83:24 98:12,18 | 224:7,24 | 206:1 207:16 | 213:15 216:17 | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 268

| | | | | |
|-------------------------|------------------------|-------------------------|--------------------------|-------------------------|
| 163:3 166:8 | 97:19 99:16 | 33:21 43:9 | test 18:13 36:3,8 | 195:5,6 197:14 |
| 171:9 173:17 | 101:7 107:20 | 46:22 55:18 | tested 197:13,18 | 221:14,19 |
| 175:5 176:24 | 117:20 154:10 | 60:19 67:21 | testified 6:20 | 222:14 228:4 |
| 177:4,6,18 | 157:12 167:22 | 75:22 76:8 | 14:6 25:6 | Theresa 2:4 |
| 189:12 192:10 | 174:8 219:14 | 78:12,23 79:2 | 65:12 94:13 | 5:21 232:18 |
| 195:10 196:1,2 | 222:9 | 79:17 103:4 | 127:11,16,20 | thing 17:15 |
| 196:15 203:1 | talking 8:12 | 107:23 135:3 | 128:17 150:22 | 27:19 65:17 |
| 207:15 210:23 | 11:20 13:8 | 140:8 176:23 | 165:17 166:16 | 77:23 86:21 |
| 210:23 211:1,7 | 25:1 27:5 | 194:7 227:20 | 168:12 175:24 | 92:3 93:18 |
| 212:2,4,6 | 28:22 32:2,18 | telling 89:19,22 | 176:7 230:15 | 133:6,20 |
| 222:15 223:2 | 35:24 43:3,14 | 104:11 131:12 | testify 14:7,9 | 170:10 171:3 |
| 225:13 228:20 | 43:24 44:9,20 | 140:19 143:8 | 131:17 140:10 | 178:2 234:19 |
| 233:22 235:11 | 55:5 56:13,22 | 144:13 169:15 | 186:20,21 | things 16:1 |
| taken 1:12,13,16 | 69:1 72:7,14 | 197:15 198:7,9 | 211:10,14 | 17:14 32:1 |
| 5:16 19:23 | 87:23 88:4 | 219:21 | 237:8 | 33:17 36:23 |
| 62:18 74:14 | 92:5 93:20 | tempting 156:22 | testifying | 41:4 51:20 |
| 106:23 113:19 | 94:18,19,20 | ten 26:24,24 | 137:19 | 52:22 60:7 |
| 210:16,22 | 95:1 97:21,22 | 104:17,20 | testimony 13:21 | 64:18 73:9,11 |
| 218:18 237:17 | 98:3,4,4,6,6,7 | 105:18 133:9 | 15:3 41:16 | 73:13,13 79:5 |
| takers 94:16 | 103:16 111:5 | 180:23 | 48:17 49:8 | 80:2,19,19 |
| talk 11:8 28:17 | 114:9 117:15 | ten-minute | 68:24 84:11 | 81:16 91:10 |
| 29:7,23 30:1,1 | 125:2 135:16 | 166:8 | 98:13,14 | 92:4 103:24 |
| 30:2,17 37:13 | 135:19 142:2 | tend 134:1 | 125:23 136:12 | 114:23 115:9 |
| 37:16 38:1 | 143:1,4 156:6 | tender 114:20 | 139:23 148:20 | 117:14 118:13 |
| 39:20,24 40:3 | 156:9,18 159:6 | 115:1 116:9 | 153:5,11 | 150:14 154:14 |
| 45:7,19 46:15 | 163:18 165:9 | Tepfer 131:20 | 164:10 172:17 | 154:18 182:17 |
| 46:19 66:15 | 176:9 187:19 | 131:22 132:4 | 175:22 182:11 | 187:13,23 |
| 73:15 74:5 | 191:22 200:4 | 132:19,21,24 | 184:3 188:1 | 217:20 |
| 81:23 86:24 | 202:12 204:17 | 133:11,15,18 | 201:5 205:18 | think 9:15 10:19 |
| 92:16,17 94:7 | 209:17 213:16 | 134:4,6,12 | 12:2 18:11 | 12:2 18:11 |
| 94:9,10 98:24 | 217:4 228:16 | 135:5,9 147:18 | 206:11 207:24 | 23:13 31:15,17 |
| 107:8,11 113:2 | 231:19 | 174:8,20 | 208:4 209:6 | 34:1 39:5 40:2 |
| 114:17,22,22 | talks 116:13,16 | 175:13 180:9 | 210:13 237:14 | 40:12,20 42:3 |
| 116:19 117:15 | 223:16 | 232:18 | tests 36:17,23 | 42:8 45:6,18 |
| 118:10,12 | task 117:19 | 82:16 | 46:2,5 50:2 | |
| 151:8 155:10 | 161:8 | Tepfer's 180:18 | 59:6 60:10,23 | |
| 159:9 161:1 | teaching 110:23 | term 90:21 93:7 | 120:9 122:3 | |
| 162:8,9,11 | 27:10,15 | 185:5 | 129:11 163:1 | 61:1,2,9 64:19 |
| 164:19 169:2 | 28:21 110:14 | terms 20:12 | 212:7,8 213:2 | 65:2 69:3,19 |
| 186:4 200:5 | 111:11 135:22 | 34:11,15 68:2 | 235:4 | 70:9 71:5 72:2 |
| 218:8 219:19 | techniques 45:2 | 69:6 70:8,15 | Thanks 52:10 | 76:16,19 79:9 |
| 220:16 227:16 | telephone 135:6 | 73:2 83:19 | theoretical | 79:11,23 81:21 |
| 236:11 | 135:8 | 84:18 138:3 | 197:15 | 82:8 84:4 |
| talked 12:18 | tell 8:14 23:21 | 221:23 226:20 | theories 196:16 | 86:17 89:3 |
| 22:5 26:14 | 25:17 31:24 | Tess 23:15 52:9 | 196:20 | 93:3,9,11,19 |
| | | 131:5 204:16 | theory 45:4 | 94:7 100:20 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 269

| | | | | |
|-------------------------|-------------------------|-------------------------|--------------------------|------------------------|
| 102:1,2 104:3 | threaten 117:2 | 160:23 162:23 | 173:8 213:23 | 197:6,14,16,17 |
| 109:9 117:10 | three 13:6 27:12 | 163:3 166:7 | 215:20,24 | 197:21 198:16 |
| 119:7 121:18 | 36:15 71:23 | 172:13 174:13 | top 8:19 34:17 | 199:3 202:9,13 |
| 122:22 125:16 | 73:22 74:3 | 176:9,10 177:5 | 199:2,6 204:7 | 203:1,7 205:18 |
| 128:19 129:2 | 111:16 112:2 | 181:3,13 | topic 17:19 | 206:7 208:16 |
| 129:21 132:12 | 117:24 118:2 | 187:18 188:15 | total 121:20 | 211:14 213:14 |
| 132:18 134:7 | 121:8,8 146:18 | 217:11 232:20 | 162:6 214:4 | 214:13 216:12 |
| 136:15,20 | 146:20 154:14 | 236:5,6 237:18 | totality 50:16 | 218:9 220:2 |
| 137:11 138:22 | 154:17 162:8 | times 8:19 41:10 | 59:23 194:14 | 221:11,13,16 |
| 140:11 143:18 | 163:12 165:20 | 42:23 94:8 | 196:5 | 221:18 222:10 |
| 145:6,12 | 166:2 176:21 | 104:16,17,19 | trafficking | 222:17 223:5,9 |
| 149:21 155:11 | 187:13 188:9 | 104:20 105:17 | 143:20 | 223:12,13,17 |
| 157:13 158:24 | 189:21 191:14 | 105:18,19,20 | trained 7:16 | 224:19 225:4 |
| 159:1,2 160:19 | 202:12,15 | 105:23 157:13 | 38:17 230:2 | 225:14 226:22 |
| 163:21 165:8,9 | 203:8 204:12 | 166:20,22 | training 42:18 | 227:12 228:18 |
| 169:24 172:20 | 208:12,24 | 180:22,23 | transcript 63:8 | 229:19 |
| 175:14,17 | 209:1 213:21 | 198:12 214:1,9 | 63:15 65:3 | trials 98:20 |
| 176:4,7,11 | 214:1 216:18 | timing 129:9 | 153:4 154:6 | tried 118:4 |
| 182:8 184:4 | 219:10 222:11 | Tina 205:10 | 220:13 235:12 | true 79:22 82:1 |
| 190:5,8,24 | 224:6 | tire 231:19 | 236:9 237:11 | 87:4,8,12,15 |
| 194:3 195:2 | thumbs-up-type | tired 209:14 | transcripts 60:5 | 87:21 88:2,6 |
| 199:1,1 201:8 | 133:20 | title 205:3 | 153:12 | 88:18,23 89:6 |
| 201:8,10,16,18 | Thursdays | titles 102:6 | treads 231:19 | 89:7,13,16,19 |
| 205:7 207:18 | 26:22 | today 7:3 8:13 | trends 37:11 | 89:22 90:3,16 |
| 208:10,11,18 | time 5:15 8:17 | 9:4,8,15 10:1 | trespassing | 91:2,17,24 |
| 211:19 224:5,8 | 9:15 13:9 16:2 | 16:6 39:23 | 106:15 | 92:5,11,14,16 |
| 226:7,21 | 18:11 22:1 | 100:21 181:21 | trial 36:21 68:18 | 92:18,24 97:9 |
| 227:14 231:16 | 24:21,24 25:4 | 183:7 184:3 | 71:24 74:1 | 97:11,22 98:3 |
| 233:16,21 | 25:11 27:2 | 207:2 213:5 | 91:15 94:3,9 | 98:12,24 99:6 |
| 234:18 | 42:20 45:13 | today's 5:14 | 98:2,17 100:1 | 99:11,24 101:3 |
| thinking 64:11 | 55:19 56:1 | 182:1 | 101:1 150:22 | 111:20 113:4 |
| 119:22 205:2 | 67:17 74:6,14 | told 18:9,12 | 153:11,15 | 113:11,19 |
| 228:13 | 74:17,22,24 | 51:21 148:16 | 154:16 155:9 | 119:4 137:11 |
| third 56:1 117:9 | 79:9 80:11 | 164:10 179:15 | 157:1,18,24 | 139:4 145:20 |
| thirties 21:6,11 | 86:16 97:13,14 | 198:10 219:24 | 158:1,6,20,22 | 146:4 156:3,11 |
| 21:16,21,24 | 97:14,15 | 228:17 | 159:12 163:17 | 157:14 182:12 |
| 28:11,15 | 100:19,23 | tomorrow | 164:12,15 | 182:20,23 |
| thought 45:14 | 107:16 108:6 | 129:11 | 166:3,22 | 183:9,20 184:6 |
| 64:11 160:4 | 108:18 110:17 | tools 201:1 | 181:23 182:22 | 184:21 185:12 |
| 165:14 169:16 | 119:9,12,13,22 | Toomin 64:4 | 191:3,10,16 | 185:17,23 |
| 172:6 183:7 | 122:21 123:1 | 75:16 76:3,5 | 192:11 193:8 | 186:23 193:2 |
| 232:1 | 125:2 127:21 | 76:18,23 80:24 | 193:12,22,23 | 194:1,8,22 |
| thoughts 23:15 | 128:23 130:10 | 87:13 153:5,8 | 194:16 195:5,8 | 195:12 197:8 |
| thousands 42:23 | 134:15 135:9 | 153:13 158:2 | 195:18 196:2 | 199:2 200:3,7 |
| 43:1 | 153:23 160:10 | 158:12 164:10 | 196:10,15 | 200:17 201:3,8 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 270

| | | | | |
|-------------------------|-------------------------|------------------------|-------------------------|-------------------------|
| 201:17 202:5,6 | 38:8 44:1 | 159:2,10,11 | use 36:6 44:17 | 204:20 208:4 |
| 202:7 206:6 | 71:16,19 72:12 | 162:2,22 165:2 | 45:1 50:16 | 213:14,19 |
| 232:14 237:14 | 94:10 128:9 | 165:13 170:18 | 78:22 90:21,22 | 214:14,24 |
| true/false 79:21 | 133:6 162:11 | 188:15 189:15 | 93:8 129:18 | 222:3 225:14 |
| truly 93:13 98:1 | 164:22 166:6 | 190:5,8 194:6 | 149:14 165:2,5 | 226:22 |
| 98:16,19 99:2 | 200:23 | 196:14 197:8 | 211:4 231:10 | video 5:2,2 |
| 99:18,20 | types 32:7 44:14 | 200:21 209:24 | 231:17 | video-recorded |
| 105:22 202:19 | 66:24 175:4 | 219:9 227:23 | usually 22:24 | 5:6,9 |
| truth 140:19 | typewriting | understanding | 103:21 114:15 | videoconference |
| 207:10 237:8 | 237:13 | 23:16 46:23 | 115:3,6 119:16 | 1:13 |
| truthful 58:23 | typical 119:14 | 48:4,5 49:10 | 121:8 | videographer |
| 58:24 145:7,13 | typically 30:15 | 70:10,16 74:9 | utility 71:24 | 3:24 5:1 6:11 |
| 146:2 234:24 | 101:14 121:11 | 76:9,11 77:3 | 84:3 | 35:7,10 62:15 |
| try 24:1 28:12 | 158:11 | 80:3 93:3 | V | 83:4,5,9,13 |
| 54:7 56:1 57:9 | U | 103:5 114:14 | vacated 153:19 | 120:10,14 |
| 77:7 84:1 | U.S 113:1 | 137:10 138:20 | vague 140:20 | 166:10,13 |
| 103:11 142:22 | ultimate 61:2 | 146:16 150:11 | 167:12,19 | 167:12,19 |
| 203:1 | 62:2 182:3,9 | 153:24 181:22 | 185:5 208:6 | 212:9,12 236:4 |
| trying 29:21 | ultimately 32:16 | 187:21 188:4 | 221:6 | videotape 109:2 |
| 30:18 103:4 | 33:23 | 201:10 215:12 | vaguely 49:17 | videotaped 1:11 |
| 115:15 158:24 | uncomfortable | 219:18 222:10 | validity 102:19 | view 146:3 |
| 165:12,12 | 57:19 | 235:16 | 102:19 | 182:16 |
| 167:16 189:22 | undereducated | understands | value 37:1 | viewed 182:9 |
| 196:14 199:19 | 87:1 | 136:16 | various 169:13 | Virginia 16:7,12 |
| 202:18 227:23 | underestimated | understood 9:9 | vary 196:4 | 24:6,9,11,13 |
| 227:24 233:10 | 107:10 | 9:13,23 75:21 | vast 34:3,21,23 | 25:2 28:5 43:4 |
| turn 128:24 | underestimati... | 75:22 84:19 | vehicle 57:24 | 43:6,7 107:21 |
| 129:9 130:10 | 112:22 | 85:19 86:3,5 | verbal 83:2 | 107:22 109:22 |
| twice 105:21 | undergrad | 86:24 222:21 | verbally 82:21 | vocabulary |
| 179:14 | 110:17 | undertake 119:3 | 148:10 | 81:19 82:5,7 |
| two 22:11 24:11 | understand 9:4 | undertaken | verbatim 153:12 | 84:16 103:24 |
| 27:24 28:1 | 9:11,12 12:16 | 120:18 | verdict 208:2 | voluntarily 75:3 |
| 32:19,20 33:3 | 15:13 23:11 | unit 125:19 | version 47:5,6,8 | 116:8 |
| 36:10,14 47:6 | 29:22 42:2 | United 1:1,14 | 59:24 114:21 | voluntariness |
| 47:7 50:21 | 47:12 53:7 | 5:12 107:3 | 122:17 150:15 | 54:17,19 55:6 |
| 56:24 60:1 | 56:10 68:24 | 113:5 | 150:23 151:10 | 56:23 57:6 |
| 63:12 66:2 | 74:21 75:17,19 | university | 158:8,9 | 58:17 82:13 |
| 76:15 137:2 | 76:14,18 77:9 | 109:19 132:16 | versions 139:10 | 115:4 116:5,10 |
| 138:12 140:6 | 77:10,11 80:6 | unnecessary | 149:16 | 182:18 188:12 |
| 149:16 165:20 | 84:20,24 85:3 | 42:3 | versus 5:11 12:6 | voluntary 57:7 |
| 176:20 179:7 | 85:6 86:4,10 | unpaid 10:17 | 13:17 33:8 | 75:15,19 77:11 |
| 182:16 200:3 | 91:12 106:2 | unqualified | 34:16 101:1 | 78:3 81:4 |
| 214:7 216:24 | 127:22 128:12 | 39:10 | 139:10 158:8 | 102:21 103:22 |
| 224:5 226:6 | 129:1 158:22 | unreliable 72:5 | 195:8,9 196:23 | 115:24 116:13 |
| type 35:23 37:21 | | updated 180:4 | 198:17 204:1 | 116:15 117:9 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 271

| | | | | |
|------------------------|-------------------------|-------------------------|----------------|------------------------|
| 118:9 142:24 | 31:4 96:18 | 95:18 100:18 | 46:1,11 47:4 | 209:12 210:20 |
| 187:8,15 188:8 | 129:7 155:12 | 103:22 111:5 | 47:17 48:10 | 211:18 212:21 |
| 188:22 230:7 | 165:15 190:18 | 114:23 115:10 | 49:4,16 50:15 | 214:17 218:16 |
| volunteer | 213:4 | 120:14 146:9 | 51:6,8 52:14 | 220:22 221:9 |
| 110:20 | wanting 45:7 | 166:10 167:18 | 53:20 55:3,20 | 222:7,20 223:7 |
| volunteeress | wants 30:2 | 167:19 192:4 | 55:22,23 56:3 | 223:22 224:17 |
| 33:16 | wasn't 32:12 | 197:10 209:17 | 57:16 58:7 | 225:18 227:6 |
| vs- 1:7 | 54:23 92:5 | 217:4 228:15 | 59:5,20 61:16 | 228:24 230:21 |
| W | | | | |
| Wacker 2:18 | 134:24 160:2 | we've 12:18 | 62:10,13 64:8 | 233:5 235:19 |
| Waddy 7:20,22 | 168:21 169:5 | 21:17 23:8 | 66:12,19 69:16 | 235:24 237:7,7 |
| 8:13,14 10:24 | 174:13 186:18 | 32:19 77:2 | 70:7 72:17 | 238:1 |
| 12:18 14:7 | 195:20,24 | 144:7 207:11 | 75:10 77:17 | witnesses |
| 180:5 181:5 | 213:17 216:14 | week 10:12,12 | 78:9 81:9 | 192:18 |
| wait 144:3 | 216:17 | weighing 88:16 | 84:13 86:1 | women 34:13 |
| waive 235:8,17 | watch 26:17,22 | weight 70:19,20 | 87:7 88:11 | 35:1 |
| 235:22,24 | 109:1 | welcome 81:20 | 90:7 91:21 | wonder 23:20 |
| waiving 203:5 | Watts 3:5 6:6 | Wells 49:12 54:3 | 101:13 103:3 | wondering 67:3 |
| 235:9 | 69:24 70:1 | went 18:2 30:24 | 105:9 106:10 | 191:20 |
| walk 29:23 | 137:4 139:18 | 33:14 73:24 | 113:8,23 | word 20:4 81:15 |
| want 9:21 22:16 | 139:18 146:8,8 | 74:1 153:11,15 | 119:13,20 | 81:17 93:8 |
| 24:5 27:4,20 | 146:12,15,16 | 165:22 166:1 | 120:23 123:11 | 129:18 140:4 |
| 28:10 31:13 | 150:1,2 158:16 | 192:2 222:10 | 125:3 126:4 | 162:2 164:13 |
| 34:18 35:3 | 164:17 176:9 | weren't 103:16 | 130:19 131:4 | 164:14 165:2,5 |
| 40:19 43:13 | 179:8 | 105:14 182:2 | 131:13,19 | words 81:13,19 |
| 46:19 48:3 | Watts's 135:22 | 226:2 | 132:9 136:5,16 | 82:8 84:16,24 |
| 56:14 60:16,17 | way 16:6 57:9 | West 2:13 3:2 | 137:9 138:7,19 | 96:14 140:6 |
| 64:2 79:7 80:1 | 61:23 65:20 | WHEREOF | 139:7 140:21 | 145:22 146:4 |
| 81:23 83:23 | 88:14,17 89:15 | 238:1 | 141:21 142:12 | 151:21 180:16 |
| 84:21 85:8,10 | 93:9 122:21 | wife 143:22 | 143:11 144:2 | 180:18 183:15 |
| 85:12,13 92:18 | 123:24 136:17 | 155:13 | 144:17 145:10 | work 11:7 29:18 |
| 93:2 96:2,3,14 | 153:3 161:9 | wife's 155:14 | 145:11 147:7 | 30:3 79:4 |
| 101:2,2 110:13 | 166:21 184:5 | William 2:14 | 148:22 151:7 | 90:21 110:13 |
| 122:8 130:11 | 185:21,22 | 6:3,24 | 152:6,22 157:6 | 110:20,24 |
| 136:17 159:9 | 186:9 187:19 | willing 30:17 | 160:2 163:1 | 111:1,14 123:5 |
| 162:1,14,21 | 189:3,11 190:9 | 39:19 | 167:6 168:19 | 123:6 124:9 |
| 165:1 173:22 | 193:24 201:18 | winning 91:14 | 169:23 171:1 | 130:7,8,9,15 |
| 177:19 179:4 | 209:21 | 157:24 | 173:2,5 174:19 | 132:2,6 173:24 |
| 181:21 185:8 | ways 91:3 | witness 6:12,16 | 175:1 176:6 | 176:2 210:12 |
| 185:12 203:2 | we'll 35:20 | 6:19 8:1,5,20 | 180:1,13 184:9 | 224:3 231:10 |
| 211:4 213:8 | 96:20 171:15 | 10:10 11:11,17 | 185:2 186:3,15 | worked 30:11 |
| 217:7 226:12 | 218:8 236:11 | 13:19 16:21 | 191:7 193:5,17 | 37:23 67:13,16 |
| 228:23 229:4 | we're 25:1 27:18 | 26:9 29:11 | 195:1 200:9,20 | 123:14 132:4 |
| wanted 29:12 | 32:18 44:9 | 35:5 37:8 38:6 | 201:7,18 202:3 | 132:11,18 |
| | 55:5 79:9 | 38:16 39:15 | 203:13 204:3 | 189:8 |
| | 87:23 95:3,16 | 41:1 42:14 | 205:22 208:9 | working 32:22 |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 272

| | | | | |
|-----------------------|-----------------------|-------------------------|------------------------|-------------------------|
| 177:5 | 138:24 | 206:23 207:14 | 062603 171:10 | 82:8 124:8,15 |
| works 56:2 | wrote 125:19 | 209:23 210:2 | 1 | 125:1 |
| world 107:24 | 146:13 162:19 | 211:23 215:10 | 14:10 92:10 | 15- 18:23,24 |
| 197:24 198:3 | 169:24 180:19 | 216:9,22 | 95:19,22 112:5 | 16 1:7 17:22 |
| worst-case | 181:9 | 223:23 232:2 | 112:15 122:14 | 18:23 82:8 |
| 228:13 | X | 233:8,10,13 | 147:12 148:4 | 16-CV-8940 |
| would-be | X 4:1,8 213:22 | 236:10 | 214:6,6 216:23 | 5:11 |
| 223:13 | 216:17,18 | year 19:24 20:13 | 1,000 101:18 | 16-year-olds |
| wouldn't 64:1 | 219:10 222:11 | 117:20 160:24 | 1:00 119:9 | 18:24 |
| 78:20 85:3,8 | Y | 176:20 205:4 | 1:42 166:11 | 17 17:22 66:3 |
| 85:10,11 87:22 | yeah 19:17,17 | years 18:4 28:14 | 1:59 166:14 | 84:2 116:8 |
| 113:13 136:18 | 20:23 22:5 | 64:12 66:3,5 | 10:30 62:16 | 17-year-olds |
| 143:2 148:13 | 24:1 28:13 | 67:10,18 69:12 | 18:23 | |
| 152:14 194:12 | 34:19,23 49:24 | 75:13 76:12 | 1700 3:7 | |
| 214:18 | 62:11 63:14,18 | 78:11 80:13 | 171 4:11 | |
| wrap 229:9 | 79:14 81:23 | 84:2,8,18 86:5 | 173 4:12 | |
| wrap-up 161:19 | 82:11 83:8 | 108:3,4 130:7 | 18 28:12 66:5 | |
| wrapping | 87:19 88:4 | 132:23 134:13 | 84:2,18 86:5 | |
| 228:21 | 93:16 96:4,17 | 135:4 164:4 | 164:1 | |
| write 17:15,17 | 97:23 102:5 | 176:21,21 | 18.75 174:4 | |
| 112:1 114:4 | 106:2 107:22 | 213:19 214:1,1 | 181 4:4 | |
| 115:22 149:2 | 108:5,11,14,21 | 214:3,4,4,7,8,9 | 18th 154:1 | |
| 150:1 162:3 | 108:21,24 | 214:9 215:7,9 | 19 176:20 232:9 | |
| 168:2 | 109:24 111:16 | 215:13,15,19 | 232:12 233:12 | |
| writing 82:24 | 111:24 112:13 | 216:4,20,23,24 | 1989 113:1 | |
| 138:11 | 118:18 119:11 | 217:9,9 228:18 | 1997 21:4 | |
| written 114:20 | 119:20 120:5 | 228:19 | 1998 21:1 | |
| 114:21 115:9 | 124:13,13,22 | yesterday 104:2 | 1999 16:23 | |
| wrong 184:24 | 126:5,22 | young 17:22 | 20:19 230:23 | |
| 228:2 | 128:16,16 | 18:6 19:9 | 19th 176:16 | |
| wrongful 94:9 | 131:6 133:14 | 73:10 | 235:2 | |
| 94:10 100:1,23 | 134:9 135:16 | Z | 2 | |
| 101:1 134:21 | 135:16 144:18 | Z 26:10 | 2 4:11 94:15 | |
| 162:11 164:22 | 146:11,20 | Z-O-T-T-O-L... | 111:23 112:1 | |
| 166:21 202:8 | 150:10 151:20 | 205:11 | 171:6,10 | |
| 208:14 | 153:22 165:12 | Zoom 235:23 | 190:15 | |
| wrongfully | 167:5 172:15 | Zottoli 205:7,11 | 2/7/24 171:21 | |
| 137:15 138:12 | 172:16,20 | 224:3,8,9 | 2:58 212:10 | |
| 138:15,16 | 174:11 175:2 | 225:19 | 20 3:7 26:17,24 | |
| 163:24 164:3 | 178:1,5,11,20 | Zyvert 3:24 5:2 | 64:12 67:10,18 | |
| 179:8 | 178:21 179:3 | 0 | 1400 5:5 | 123:3 124:9,15 |
| wrongly 93:24 | 196:24 197:11 | 0 213:19 | 15 18:23 31:16 | 125:2 135:4 |
| 94:1,2,11 | 203:23 205:10 | 06 87:13 90:3 | 35:1 75:13 | 223:11 236:7 |
| 98:10 137:3,21 | | | 76:12 80:13 | 200 2:7 22:21,23 |
| 137:22 138:21 | | | | |

Ben Baker, et al. v. City of Chicago, et al.
 Deposition of Allison D. Redlich, Ph.D. - Taken 4/25/2024

Page 273

| | | | |
|-------------------------|-------------------------|------------------------|------------------------|
| 25:6,11 26:14 | 161:8 166:19 | 312 2:3,8,14,19 | 8 |
| 26:15 | 176:16,20 | 3:3,8 | 8 136:21 146:10 |
| 2000 106:20 | 205:8 | 32 28:14 79:24 | 149:2 167:22 |
| 2000s 54:3 | 2024 1:20 5:14 | 82:1 | 179:5 |
| 134:22 | 94:15 95:5 | 33 3:2 | 800 21:21 32:22 |
| 2003 20:22 | 174:2 232:9,12 | 334 2:13 | 94:16,21 |
| 2004 8:22 11:22 | 232:19,21 | 34 27:23 | 800-plus 22:13 |
| 12:1 37:23 | 234:23 235:2 | 341-9646 2:14 | 84-1834 1:17 |
| 125:4 172:24 | 238:3 | 372-0770 3:3 | 3:23 237:1 |
| 2005 37:18 | 212 4:5 | 3rd 2:2 | 238:10 |
| 38:13 39:1,9 | 229 4:3 | 4 | 88 34:7 |
| 45:9 47:1 50:9 | 243-5900 2:3 | 497:3,7 160:21 | 89 214:9 |
| 57:24 139:4 | 25 18:4 29:5 | 4-25-24 95:23 | 9 |
| 151:23 | 43:4 81:16 | 171:7 173:20 | 9 149:8 |
| 2006 45:21 46:8 | 122:18 123:3 | 4,687.50 10:19 | 9:00 1:20 |
| 62:22 69:9 | 25th 1:19 5:14 | 40 31:18 114:24 | 9:07 5:15 |
| 88:7,24 106:22 | 26 38:3 122:20 | 427-3200 2:8 | 9:47 35:8 |
| 107:3,5,23 | 168:24 175:18 | 44 117:7 | 9:55 35:10 |
| 108:12 113:5 | 176:5 232:24 | 45 119:19 120:1 | 90 163:15 |
| 113:20 143:13 | 233:17,20 | 120:4 | 196:18,22 |
| 154:1 168:24 | 234:12 | | 213:19 214:1 |
| 172:19 | 27 94:15 95:5 | | 217:9 223:10 |
| 2008 108:16,20 | 232:19,21 | 5 | 228:18 |
| 2009 122:22 | 233:12 234:23 | 5/10/24 238:12 | 93 117:3 |
| 123:2 132:16 | 2700 3:2 | 50 31:18 47:10 | 94 160:19 |
| 201 2:7 | 2nd 238:2 | 195:7 | 163:15 196:13 |
| 2010 101:17,22 | 3 | 500 44:18 | 214:8,9,11 |
| 102:4 103:12 | 3 4:12 95:9 | 5200 2:18 | 95 4:10 195:9 |
| 104:10 108:14 | 107:8 115:23 | 53 2:13 | 213:12 214:9 |
| 108:15 | 130:5 173:19 | 57 95:18 | 96 21:23 117:3 |
| 2010s 13:12 15:1 | 3,500 100:9 | 580-1030 3:8 | 982-0090 2:19 |
| 2012 224:23 | 3:12 212:13 | 6 | 99 21:2 |
| 2014 225:6 | 3:41 236:5 | 6 4:3 | |
| 2016 143:17 | 3:42 236:15 | 600 21:22 | |
| 2017 26:6 125:5 | 30 26:18 214:1,1 | 60602 5:5 | |
| 2018 26:6 | 215:7,9,15,19 | 60603 3:3,8 | |
| 2019 107:19 | 216:4,7,7,7 | 60604 2:8,13 | |
| 109:7 111:10 | 217:9 228:19 | 60606 2:18 | |
| 2020 100:20 | 30-somethings | 60607 2:3 | |
| 2021 25:22 | 27:5 28:3,4 | | |
| 100:20 | 30-year-olds | | |
| 2022 25:21,24 | 24:14,22 33:1 | 7 | |
| 2023 93:21 | 31 123:2 | 75 195:8 | |
| 98:21 99:12 | 311 2:2,18 | | |
| 100:18 130:3 | | | |