

# Exhibit C

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

In re: WATTS COORDINATED  
PRETRIAL PROCEEDINGS

)  
) Master Docket Case No. 19-cv-01717  
)  
) Judge Andrew R. Wood  
)  
) Magistrate Judge Sheila M. Finnegan  
)

THIS DOCUMENT RELATES TO CASE NO. 16 CV 8940

**PLAINTIFF BEN BAKER'S RESPONSES TO  
DEFENDANT KALLATT MOHAMMED'S  
FIRST SET OF INTERROGATORIES IN CASE NO. 16 CV 8940**

Plaintiff Ben Baker, by and through his undersigned counsel, and pursuant to Federal Rule of Civil Procedure 33, provides the following responses to Defendant Kallatt Mohammed's First Set of Interrogatories to Plaintiff Ben Baker:

1. Have you ever personally engaged in drug related activities? If your answer is yes, then please identify by specific year or a specific period of years any time that you engaged in drug related activities, and for each such year or period of years describe your activities, i.e., sold, manufactured, etc., and the types of controlled substances involved.

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is not relevant, overly broad with respect to temporal and subject matter scope, and not proportional to the needs of the case. Subject to and without waiving these objections and limited to the time period 1997 to present, Plaintiff Baker sold cocaine and heroin at various times between approximately 1998 to 2004.

**SUPPLEMENTAL ANSWER:** Plaintiff maintains all of his previous objections to these interrogatories, including that they are irrelevant and overly broad, and not proportional to the needs of the case given that there is no relevance to this case. Whether Mr. Baker has ever "engaged in drug related activities" is not an issue in this case. Rather, the issue is whether Defendants violated Mr. Baker's constitutional rights by framing him for crimes he did not commit. They undoubtedly did that, as evidenced by, among other things, the fact that Mr. Baker's convictions were vacated and he received a certificate of innocence.

Subject to those objections and his previous objections, Plaintiff notes that Ben Baker was criminally charged with distributing approximately 5 grams of heroin and/or fentanyl on three days in 2017. Those charges are pending in case No. 18-cr-216 (N.D. Ill.). Plaintiff pled not guilty to the charges.

**FURTHER SUPPLEMENTAL ANSWER:** Plaintiff maintains all of his previous objections to these interrogatories, including that they are irrelevant and overly broad, and not proportional to the needs of the case given that there is no relevance to this case. Whether Mr. Baker has ever "engaged in drug related activities" is not an issue in this case. Rather, the issue is whether Defendants violated Mr. Baker's constitutional rights by framing him for

crimes he did not commit during various events in 2004 and 2005. They undoubtedly did that, as evidenced by, among other things, the fact that Mr. Baker's convictions were vacated, he received certificates of innocence, and that the Civilian Office of Police Accountability—a City Agency—have concluded the same. Indeed, when Mr. Baker provided information in response to this interrogatory in August 2017, he was focused on the time-period in the mid-2000s when the Defendants were engaged in framing him.

Subject to those objections and his previous objections, Plaintiff notes that Ben Baker was criminally charged with distributing approximately 5 grams of heroin and/or fentanyl on three days in 2017. On May 29, 2019, Mr. Baker pled guilty to one count of the charges and admitted to selling 5.0 grams or fewer of a controlled substance on seven occasions from March – August 2017. Answering further, Mr. Baker participated in distributing controlled substances on a few other dates in 2017 and 2018.

2. If your answer to Interrogatory 1 was yes, then please state whether any of your drug related activities occurred after the date of your release from prison for attempt murder in Cook County criminal docket number 93 CR 28397 (or your release from prison for unlawful use of a weapon by a felon in Cook County criminal docket number and 93 CR 27089). If your answer is yes, then specifically identify every geographic location where you engaged in such activities, including, if known, the street address.

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is not relevant, overly broad with respect to temporal and subject matter scope, and not proportional to the needs of the case. Subject to and without waiving these objections, 527 E. Browning Street.

**SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein.

**FURTHER SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein.

3. With reference to the time frame described in Interrogatory 2, have you ever engaged in drug related activity jointly with another person or persons or on behalf of any a group? If so, please

- (a) identify each such individual by his/her name, street name or nickname and
- (b) any group with whom you acted jointly, and;
- (b) identify each specific location or locations where these acts occurred.

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is not relevant, overly broad with respect to temporal and subject matter scope, harassing, and not proportional to the needs of the case.

**SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein.

**FURTHER SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein

4. Please state the last year during which you engaged, directly or indirectly, in any drug related activity.

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is not relevant and also on the basis that it is vague and ambiguous. Subject to and without waiving any objections, Plaintiff used marijuana in 2017.

**SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein.

**FURTHER SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein.

5. Have you ever belonged to or been associated with any street gang or criminal organization, for example, the Black Disciples, Gangster Disciples, or Hobos? If your answer is yes, then please specifically identify each such gang or criminal organization, state your approximate age when you first joined or began to associate with it, and indicate the highest rank, if any, that you attained in it.

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is irrelevant and overly broad with respect to temporal and subject matter scope. Subject to and without waiving this objection, Plaintiff joined the Gangster Disciples when he was approximately 18 years old. He did not hold rank.

6. If your answer to Interrogatory 5 is yes, then state whether you currently are a member or associate of any gang or criminal organization. If your answer is no, then please indicate the year in which you stopped being a member or associate and describe with specificity the circumstances behind your departure from the gang(s) or organization(s) you identified in Interrogatory 5.

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is irrelevant, overbroad, and also on the basis that it is vague and ambiguous. Subject to and without waiving these objections, no. Plaintiff left the Gangster Disciples in or around 2011 or 2012.

7. With reference to the time frame described in Interrogatory 2, did you personally earn cash or other valuable property from your drug related activities, and, if so, estimate the average amount of cash or the average value of any property that you would earn on a weekly basis. Also, what is the most money or the highest value of any property that you earned in any one week from your drug related activities?

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is not relevant, overly broad with respect to temporal and subject matter scope, and harassing.

**SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein.

**FURTHER SUPPLEMENTAL ANSWER:** Plaintiff incorporates his objections and answer to Interrogatory No. 1 herein.

8. With reference to the time frame described in Interrogatory 2, have you ever possessed, used or carried any firearm.

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is not relevant, overly broad, harassing, and not proportional to the needs of the case.

9. Did you engage at any time in any drug related activities in the 527 building of the Ida B. Wells Housing project? If your answer is yes, what was the last date on which you were involved, directly or indirectly, in such activity?

**ANSWER:** Plaintiff objects to this interrogatory on the basis that it is not relevant, overly broad, and not proportional to the needs of the case. Subject to and without waiving these objections, 2005.

Respectfully submitted,

/s/ Josh Tepfer

Arthur Loevy  
Jon Loevy  
Scott Rauscher  
Josh Tepfer  
Theresa Kleinhaus  
Sean Starr  
LOEVY & LOEVY  
311 North Aberdeen Street. Third Floor  
Chicago, Illinois 60607  
Phone: (312) 243-5900  
Fax: (312) 243-5902

---

**CERTIFICATE OF SERVICE**

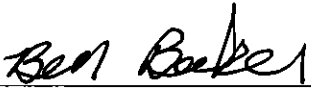
I, Joshua Tepfer, an attorney, certify that on August 8, 2023 I caused a copy of Plaintiff Ben Baker's Supplemental Responses to Defendant Kallatt Mohammed's First Set of Interrogatories on all counsel of record via electronic mail.

/s/ Joshua Tepfer

### VERIFICATION

I, Ben Baker, verify that I have reviewed the attached Supplemental Responses to Defendant Mohammed's Interrogatories, and I certify that the answers are true and correct to the best of my knowledge, information, and memory.

Date: 8-8-2023

  
Ben Baker