

Group Ex. D - 1



Transcript of the Deposition of
Elgen Moore

Case: n Re: Watts Coordinated Pretrial Proceedings
Taken On: February 28, 2024

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1 **at County Jail for Christmas?**

2 A. No.

3 **Q. Okay. Other than Christmas, any other**
4 **family gatherings that you would have missed during**
5 **that 60 days?**

6 A. New Year's Eve, New Year's.

7 **Q. Anything else?**

8 A. My family birthdays, Valentine's Day.

9 **Q. Who was your sweetheart at that time?**

10 A. Tanesha Cash.

11 **Q. And if I got this right, after -- strike**
12 **that.**

13 **Right after you got out of jail, that's**
14 **when you started selling heroin for Ben Baker;**
15 **right?**

16 A. Yes.

17 **Q. Okay.**

18 MR. BAZAREK: We can take that down.

19 Let's look at Exhibit 12.

20 (Exhibit 12 referenced for
21 identification.)

22 BY MR. BAZAREK:

23 **Q. Well, I didn't ask you this earlier.**

24 **Didn't you get caught up in Operation**

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1 Sin City?

2 A. Yes.

3 Q. And were you arrested? Were you arrested
4 as part of the Sin City takedown?

5 A. Yes.

6 Q. And you were arrested for selling
7 narcotics to an undercover officer; right?

8 A. Yes.

9 Q. What did you sell to the undercover
10 officer?

11 A. Heroin.

12 Q. And the heroin that you sold to the
13 other -- strike that.

14 The heroin that you sold to the
15 undercover officers, was that heroin you were
16 selling for Ben Baker?

17 A. Yes.

18 Q. So what I would like to do, sir,
19 Mr. Moore, if you'd look at Exhibit 12, I want you
20 just to -- I know it's not the best quality, but I
21 would like you look from No. 1. You see there's
22 photographs of people with names, and it goes 1
23 through 63.

24 Can you -- if you see anyone you know, can

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1 A. Yes.

2 Q. Okay. So let's look at exhibit -- I think
3 the next one is going to be 15.

4 (Exhibit 15 referenced for
5 identification.)

6 BY MR. BAZAREK:

7 Q. Oh, this. I believe this is the Sin City
8 arrest, April 27, 2005.

9 Does that sound right?

10 A. Yes.

11 Q. But you didn't actually get arrested
12 on that day; right? That was part of the
13 undercover investigation. Or did you get arrested
14 on April 27th?

15 A. I got arrested.

16 Q. On April 27th?

17 A. If that's the day that they came and
18 arrested people for Sin City, yes.

19 Q. Right. There was a big takedown, right,
20 of a bunch of people? A bunch of people got
21 arrested; right?

22 A. Yes.

23 Q. What I'm asking you is did you -- but did
24 you get arrested on the same day that you sold the

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1 **drugs to the undercover officer?**

2 A. No.

3 **Q. It was a different day; right?**

4 A. Yes.

5 **Q. Okay. And by the way, on that day when**
6 **you were selling drugs to the undercover officer,**
7 **Bryant Patrick was with you at that time; right?**

8 A. Yes.

9 **Q. Okay. Let's look at Exhibit 16.**

10 **(Exhibit 16 referenced for**
11 **identification.)**

12 BY MR. BAZAREK:

13 **Q. Here's an arrest, Mr. Moore, from June 28,**
14 **2006.**

15 **Do you remember this arrest?**

16 A. Yes.

17 **Q. What do you remember about this arrest?**

18 A. This was an arrest when drugs was planted
19 on me again at the --

20 **Q. And this arrest was made by different**
21 **Chicago Police Officers that didn't work for**
22 **Ron Watts; right?**

23 A. Yes.

24 **Q. It looks like you were arrested by an**

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1 STATE OF ILLINOIS)
2) SS.
3 COUNTY OF COOK)

4 I, Sharon L. Patanella, Certified
5 Shorthand Reporter, do hereby certify that on
6 February 28, 2024, the deposition of the witness,
7 ELGEN MOORE, called by the Defendants, was taken
8 before me via videoconference, reported
9 stenographically, and was thereafter reduced to
10 typewriting under my direction.

11 The said deposition was taken via
12 videoconference, and there were present counsel,
13 all via videoconference, as previously set forth.

14 The said witness, ELGEN MOORE, was first
15 duly sworn to tell the truth, the whole truth, and
16 nothing but the truth, and was then examined upon
17 oral interrogatories.

18 I further certify that the foregoing is a
19 true, accurate, and complete record of the
20 questions asked of and answers made by the said
21 witness, ELGEN MOORE, on the date and time
22 hereinabove referred to.

23 The signature of the witness, ELGEN MOORE,
24 was waived by counsel.

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1 I further certify that I am not a relative
2 or employee or attorney or counsel of any of the
3 parties, or a relative or employee of such attorney
4 or counsel, or financially interested directly or
5 indirectly in this action.

6 Witness my official signature as a
7 Certified Shorthand Reporter in the State of
8 Illinois on March 20, 2024.

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