

# **EXHIBIT 14**



Transcript of the Deposition of  
**Ben Baker**

**Case:** In Re: Watts Coordinated Pretrial Proceedings  
**Taken On:** August 9, 2023

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In Re: Watts Coordinated Pretrial Proceedings  
Deposition of Ben Baker - Taken 8/9/2023

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

In re: WATTS COORDINATED      )  
PRETRIAL PROCEEDINGS        )  
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No. 19 CV 1717

The videotaped deposition of BEN BAKER,  
called by the Defendant for examination, taken pursuant  
to notice and pursuant to the Federal Rules of Civil  
Procedure for the United States District Courts  
pertaining to the taking of depositions, taken before  
Brianna Uhlman, Certified Shorthand Reporter and  
Registered Professional Reporter, at 311 South Wacker  
Drive, Suite 5200, Chicago, Illinois, commencing at  
10:13 a.m. on August 9, 2023.

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<p style="text-align: right;">Page 114</p> <p>1 various times between approximately 1998 to 2004, 2 correct? 3 A. On here, yes. 4 <b>Q. Is that truthful?</b> 5 MR. TEPFER: Objection to -- I don't -- the form of 6 the question. I don't understand the question. 7 BY MR. BAZAREK: 8 <b>Q. Is that a truthful answer, "Plaintiff Baker</b> 9 <b>sold cocaine and heroin at various times between</b> 10 <b>approximately 1998 to 2004"?</b> 11 MR. TEPFER: Are you asking if that's a truthful 12 statement or -- 13 MR. BAZAREK: Yes. 14 BY THE WITNESS: 15 A. Well, for what I thought I was talking about, 16 yes. 17 <b>Q. Well, it's true you were a drug dealer from</b> 18 <b>approximately 1998 to 2004, at least according to this</b> 19 <b>answer, right?</b> 20 A. Yes. I sold drugs during that time. 21 <b>Q. Okay. And you sold drugs out of Ida B. Wells,</b> 22 <b>right?</b> 23 A. Out of the Extensions, yes. 24 <b>Q. Okay. Where would you store your narcotics</b></p>	<p style="text-align: right;">Page 116</p> <p>1 asking you about your drug-related activities, right? 2 MR. TEPFER: Objection to the form. The 3 question -- 4 BY MR. BAZAREK: 5 <b>Q. Is that yes?</b> 6 MR. TEPFER: -- asks about various things. 7 But go ahead. 8 MR. BAZAREK: Plenty of speaking objections here 9 throughout -- I'll just note that -- through this 10 deposition. 11 BY MR. BAZAREK: 12 <b>Q. But anyway, it's asking you for --</b> 13 A. It's saying from -- since my release from 14 prison for attempted murder in Cook County? 15 <b>Q. Yes. Since that time. Yes. Right?</b> 16 A. It says "If your answer is yes, then 17 specifically identify every geographic location where 18 you engaged in such activities." 19 <b>Q. Right. And then there's this lawyer objection</b> 20 <b>that's made. And then the answer is, the geographic</b> 21 <b>location for the drug-related activities, you give the</b> 22 <b>address of 527 East Browning Street, correct?</b> 23 MR. TEPFER: Objection to the characterization of 24 the lawyer objection.</p>
<p style="text-align: right;">Page 115</p> <p>1 that you sold between 1998 to 2004? 2 A. Various places. 3 <b>Q. Where?</b> 4 A. In vacant apartments. A lot of times, in 5 vacant apartments. 6 <b>Q. How about the apartment that you lived in with</b> 7 <b>Clarissa and your children?</b> 8 A. Once. 9 <b>Q. So from 1998 to 2004, it's your testimony you</b> 10 <b>only stored illegal narcotics in your apartment once?</b> 11 A. That I recall, yes. 12 <b>Q. Okay.</b> 13 MR. TEPFER: Did you say you wanted to take a lunch 14 at 1:00? It's 12:58. 15 MR. BAZAREK: Yeah. I'm gonna -- I'll -- Let me 16 finish -- see if I can finish up with this exhibit. 17 BY MR. BAZAREK: 18 <b>Q. But, okay. All right. Looking at</b> 19 <b>Interrogatory Number 2, it's asking you about the --</b> 20 <b>every geographic location where you engaged in such</b> 21 <b>activities, including, if known, the street address. Do</b> 22 <b>you see that, the last part of that question?</b> 23 A. Yeah. 24 <b>Q. Okay. And it's asking -- That question is</b></p>	<p style="text-align: right;">Page 117</p> <p>1 But go ahead. 2 BY THE WITNESS: 3 A. Yes. 4 <b>Q. So why didn't you include 6215 South Rhodes in</b> 5 <b>this answer?</b> 6 A. Because I was under the impression that we was 7 strictly talking about the time frame of the Watts case. 8 <b>Q. Why didn't you include 6540 South Vernon in</b> 9 <b>this answer?</b> 10 A. Because I assumed that we was strictly talking 11 about the Watts case, as evident with my answer, 12 527 East Browning. 13 <b>Q. Why didn't you include the occasions where you</b> 14 <b>would bring the narcotics to Zachary Brown?</b> 15 A. Because I assumed that we was strictly talking 16 about the Watts case. 17 <b>Q. Take a look at Number 3. You were asked,</b> 18 <b>"With reference to the time frame described in</b> 19 <b>Interrogatory Number 2, have you ever engaged in</b> 20 <b>drug-related activity jointly with another person or</b> 21 <b>persons or on behalf of a group? If so, please" -- you</b> 22 <b>know, it asks you to identify individuals, group,</b> 23 <b>specific locations. And there's just an objection</b> 24 <b>there. Do you see that?</b></p>

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<p>1 A. -- members. Yeah.</p> <p>2 <b>Q. Right. Tell me, other than Watts, who are you</b></p> <p>3 <b>referring to?</b></p> <p>4 A. I'm referring to AJ.</p> <p>5 <b>Q. Who else?</b></p> <p>6 A. Nichols, he put it on me.</p> <p>7 <b>Q. I said other than your -- Sir, I said other</b></p> <p>8 <b>than -- I know you're making claims that you were</b></p> <p>9 <b>unlawfully arrested. I'm asking about other arrests</b></p> <p>10 <b>that you observed any law enforcement officer where he</b></p> <p>11 <b>planted drugs on a person.</b></p> <p>12 A. Yeah, that's about it. AJ and Watts.</p> <p>13 <b>Q. Anyone else?</b></p> <p>14 A. Guilt by association.</p> <p>15 <b>Q. What does that mean?</b></p> <p>16 A. His whole team was dirty. So the apple don't</p> <p>17 fall far from the tree. If he was doing it, they was</p> <p>18 doing it.</p> <p>19 <b>Q. Okay. I'm asking you what you observed.</b></p> <p>20 A. I'm telling you. I'm answering your question.</p> <p>21 <b>Q. All right. So you said AJ and Watts you</b></p> <p>22 <b>observed plant narcotics on someone other than yourself</b></p> <p>23 <b>or your wife, Clarissa Glenn, correct?</b></p> <p>24 A. Yeah.</p>	<p>1 <b>Q. Have you ever sold drugs?</b></p> <p>2 A. Yes, I have.</p> <p>3 <b>Q. You've sold heroin, right?</b></p> <p>4 MR. TEPFER: Objection: asked and answered.</p> <p>5 BY MR. BAZAREK:</p> <p>6 <b>Q. Right?</b></p> <p>7 A. I have.</p> <p>8 <b>Q. For years, you sold heroin, right?</b></p> <p>9 MR. TEPFER: Objection: asked and answered.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I have.</p> <p>12 <b>Q. Right. In your interrogatory answers, you</b></p> <p>13 <b>said you were selling heroin from 1998 through 2004,</b></p> <p>14 <b>right?</b></p> <p>15 MR. TEPFER: Objection: misstates the testimony,</p> <p>16 record, asked and answered.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I did.</p> <p>19 <b>Q. And so you received income for that, right?</b></p> <p>20 A. Income?</p> <p>21 <b>Q. Money.</b></p> <p>22 A. Yeah.</p> <p>23 <b>Q. So you -- When you hear the phrase "income,"</b></p> <p>24 <b>you think, oh, that's something you have to pay taxes</b></p>
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<p>1 <b>Q. Who?</b></p> <p>2 A. Different people.</p> <p>3 <b>Q. Who?</b></p> <p>4 A. I don't know.</p> <p>5 <b>Q. Can you tell me one person at this deposition</b></p> <p>6 <b>that you say Alvin Jones or Watts planted narcotics on?</b></p> <p>7 A. Bryant Patrick.</p> <p>8 <b>Q. Is he a drug dealer?</b></p> <p>9 A. I mean, he sold drugs.</p> <p>10 <b>Q. Just like you, right?</b></p> <p>11 MR. TEPFER: Objection: argumentative.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I don't sell drugs.</p> <p>14 MR. TEPFER: Asked and answered.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I don't sell drugs.</p> <p>17 <b>Q. It's your testimony that you've never sold</b></p> <p>18 <b>drugs, sir?</b></p> <p>19 A. I didn't say I never --</p> <p>20 MR. TEPFER: Objection: misstates the testimony,</p> <p>21 argumentative.</p> <p>22 BY MR. BAZAREK:</p> <p>23 <b>Q. Go ahead.</b></p> <p>24 A. I don't sell drugs.</p>	<p>1 <b>on; is that right?</b></p> <p>2 A. Yeah.</p> <p>3 <b>Q. So in your mind, the money that you made</b></p> <p>4 <b>selling narcotics was not income, correct?</b></p> <p>5 A. Not legal income, no. I couldn't report it.</p> <p>6 I couldn't go and buy something with it like property or</p> <p>7 something like that because the police or the federal</p> <p>8 bureau, somebody, when they -- they would take it. So I</p> <p>9 couldn't claim it.</p> <p>10 <b>Q. When did you --</b></p> <p>11 A. Am I right?</p> <p>12 <b>Q. When did you observe --</b></p> <p>13 A. Am -- I can't ask you questions?</p> <p>14 MR. TEPFER: You don't get to ask him questions.</p> <p>15 THE WITNESS: Oh, okay.</p> <p>16 BY MR. BAZAREK:</p> <p>17 <b>Q. When did you observe narcotics being planted</b></p> <p>18 <b>on Bryant Patrick?</b></p> <p>19 A. In 527.</p> <p>20 <b>Q. What year?</b></p> <p>21 A. I don't recall the year.</p> <p>22 <b>Q. Describe the circumstances of what you</b></p> <p>23 <b>observed.</b></p> <p>24 A. They had us in the hallway, and he would say,</p>

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<p>1 "Who claiming these drugs?"</p> <p>2 <b>Q. Who would say that?</b></p> <p>3 A. Watts. Sergeant Watts. "Who claiming these</p> <p>4 drugs?" Nobody will say nothing. "Okay. Well, I'm</p> <p>5 taking you, you, you." And that's how he operated.</p> <p>6 <b>Q. Okay. I'm talking specifically about</b></p> <p>7 <b>Bryant Patrick.</b></p> <p>8 A. That was one of the times.</p> <p>9 <b>Q. Was it before your July '04 arrest or after?</b></p> <p>10 A. Before, I believe.</p> <p>11 <b>Q. Do you remember what year?</b></p> <p>12 A. No, sir, I do not.</p> <p>13 <b>Q. Okay. Did Alvin Jones say anything on that</b></p> <p>14 <b>day?</b></p> <p>15 A. Alvin Jones always say something.</p> <p>16 <b>Q. No. I'm asking on the day that you're talking</b></p> <p>17 <b>about, did Alvin Jones say anything?</b></p> <p>18 A. Alvin Jones always said something.</p> <p>19 <b>Q. Sir, you've testified that narcotics were</b></p> <p>20 <b>planted on Bryant Patrick prior to July of 2004,</b></p> <p>21 <b>correct?</b></p> <p>22 A. I believe so. I can't say the exact date.</p> <p>23 But I believe so.</p> <p>24 <b>Q. Okay. My question was prior to your arrest in</b></p>	<p>1 <b>Q. -- had narcotics planted on him.</b></p> <p>2 MR. TEPFER: All right. Just -- We have to --</p> <p>3 can't talk over each other for the court reporter. Let</p> <p>4 him finish the question, give me time if I have an</p> <p>5 objection, and then you can answer the question.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Oh, I can answer now?</p> <p>8 <b>Q. Yes.</b></p> <p>9 A. One word he said was "Fuck you."</p> <p>10 <b>Q. Did he say anything else on that day?</b></p> <p>11 A. I don't know.</p> <p>12 <b>Q. As you sit at this deposition, the only thing</b></p> <p>13 <b>you recall Alvin Jones saying on that day was "Fuck</b></p> <p>14 <b>you"?</b></p> <p>15 A. You asked me to give you one word. I gave you</p> <p>16 that word.</p> <p>17 <b>Q. Can you tell me anything else other than</b></p> <p>18 <b>Alvin Jones said "Fuck you" on that day?</b></p> <p>19 A. "You're going to jail."</p> <p>20 <b>Q. Anything else?</b></p> <p>21 A. I don't know, sir. I can't recite it</p> <p>22 verbatim.</p> <p>23 <b>Q. All right. As you sit at this deposition, you</b></p> <p>24 <b>don't recall anything else that was said, correct?</b></p>
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<p>1 <b>July of '04. I didn't ask -- I didn't say a specific</b></p> <p>2 <b>day. It was prior to that time, right?</b></p> <p>3 A. Your question was did Alvin Jones say anything</p> <p>4 that day.</p> <p>5 <b>Q. Well, let's -- I want to get some -- Okay. So</b></p> <p>6 <b>you -- Did he say anything that day? Yeah.</b></p> <p>7 A. He always said something every day --</p> <p>8 <b>Q. What did he say?</b></p> <p>9 A. -- he come in the building, whether it's a</p> <p>10 threat or whatever it is.</p> <p>11 <b>Q. What did -- What did --</b></p> <p>12 A. I can't --</p> <p>13 <b>Q. What did --</b></p> <p>14 A. I can't recite verbatim --</p> <p>15 <b>Q. Tell me --</b></p> <p>16 A. -- what Alvin Jones said.</p> <p>17 <b>Q. Tell me one word that Alvin Jones said --</b></p> <p>18 A. "Fuck you."</p> <p>19 <b>Q. -- on the day --</b></p> <p>20 A. That's what he said.</p> <p>21 <b>Q. -- on the day --</b></p> <p>22 A. "Fuck you."</p> <p>23 <b>Q. -- that Bryant Patrick --</b></p> <p>24 A. That's one word he said.</p>	<p>1 MR. TEPFER: Mischaracterizes the testimony.</p> <p>2 Objection.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I don't recall.</p> <p>5 <b>Q. Would anything help you recall?</b></p> <p>6 A. Yeah. If you could play back what he said.</p> <p>7 <b>Q. Is Bryant Patrick -- Strike that.</b></p> <p>8 <b>Was Bryant Patrick a Gangster Disciple?</b></p> <p>9 A. I don't know.</p> <p>10 <b>Q. Was he in the same gang that you were in?</b></p> <p>11 A. I don't know.</p> <p>12 <b>Q. Where did Bryant Patrick live?</b></p> <p>13 A. He lived in 527.</p> <p>14 <b>Q. That's the building where you sold narcotics</b></p> <p>15 <b>out of, right?</b></p> <p>16 A. Yes, I used to sell drugs out of that</p> <p>17 building.</p> <p>18 <b>Q. Did Bryant Patrick sell drugs out of that</b></p> <p>19 <b>building?</b></p> <p>20 A. He has.</p> <p>21 <b>Q. Did Bryant Patrick sell drugs for you?</b></p> <p>22 A. He has.</p> <p>23 <b>Q. What drugs did Bryant Patrick sell for you?</b></p> <p>24 A. Heroin.</p>

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1       **Q. What would you pay Bryant Patrick to -- Strike**  
2 **that.**  
3       **How would you pay -- Strike that.**  
4       **Would you pay Bryant Patrick money to sell**  
5 **drugs for you?**  
6       A. Yes, I have.  
7       **Q. What did you pay him?**  
8       A. Money.  
9       **Q. Did you pay him weekly? daily?**  
10      A. Daily.  
11      **Q. Okay. How many people were on your payroll**  
12 **when you were selling drugs out of the 527 building?**  
13      A. Not sure, because I had, well, Bryant. So I'm  
14 not sure how many people.  
15      **Q. Who sold drugs for you at Ida B. Wells other**  
16 **than Bryant Patrick?**  
17      A. Elgen Moore.  
18      **Q. Who else?**  
19      A. That was basically it. Like ...  
20      **Q. Did you engage in hand-to-hand transactions at**  
21 **Ida B. Wells?**  
22      A. I have.  
23      **Q. And where in Ida B. Wells would you engage in**  
24 **your own hand-to-hand transactions?**

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1       A. In the hallway.  
2       **Q. Like, any floor or a particular floor?**  
3       A. Yeah. Sometimes we'd be on the first floor.  
4 Sometimes we'd be on the second floor.  
5       **Q. Would you ever engage in hand-to-hand**  
6 **narcotics transactions in some of the vacant apartment**  
7 **buildings?**  
8       A. The vacant apartment buildings?  
9       **Q. Yeah.**  
10      A. None of the buildings was vacant.  
11      **Q. Okay. Would you ever engage in narcotics**  
12 **transactions at Ida B. Wells while inside an apartment**  
13 **there?**  
14      A. A vacant -- No.  
15      **Q. I'm not talking about vacant. I'm talking**  
16 **about where people were living.**  
17      A. Not that I recall, no.  
18      **Q. Okay. So all the narcotics transactions you**  
19 **would have engaged in would be on one of the floors**  
20 **inside the 527 building?**  
21      MR. TEPFER: Objection to the form.  
22      But go ahead.  
23 BY THE WITNESS:  
24      A. No, because I have -- I have, like, passed

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1       drugs out of the apartment before, out of my apartment.  
2       **Q. Okay. And that was Apartment 206?**  
3       A. Yeah.  
4       **Q. And so how would someone go buy narcotics from**  
5 **you out of the 206 apartment?**  
6       A. If I wasn't -- If I wasn't downstairs or in  
7 the hallway, they would call my name, and I would come  
8 out.  
9       **Q. What do you mean they'd call your name?**  
10      A. They would say my name in the hallway or they  
11 would knock on the door.  
12      **Q. And then sometimes Clarissa would answer the**  
13 **door or the kids?**  
14      A. If Clarissa answered the door, she would say,  
15 "Ben, somebody at the door for you," because they would  
16 say, "Is Ben here?"  
17      **Q. And then what would you do?**  
18      A. I would go outside and see what they wanted.  
19      **Q. All right. So you would take the narcotics**  
20 **that were stored in the apartment that you lived in with**  
21 **your --**  
22      A. No, sir.  
23      **Q. -- with Clarissa and your son -- sons, right?**  
24 **No?**

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1       A. No. I told you, I stored drugs in there  
2 before, but not then.  
3       **Q. So where would you -- where would you get the**  
4 **drugs from?**  
5       A. I told you, I had the codes to the vacant  
6 doors, the vacant apartments. They had these steel  
7 doors on them. So I had the codes to those doors.  
8       **Q. How would you get the codes?**  
9       A. From being around. Somebody would get the  
10 code, and then they'll tell you, "It's vacant up here.  
11 The code is this."  
12      **Q. But if you're storing narcotics in there, how**  
13 **would -- wouldn't you be worried about someone stealing**  
14 **your narcotics?**  
15      A. No.  
16      **Q. Did -- Was any of your narcotics ever stolen**  
17 **that you stored at Ida B. Wells?**  
18      A. Not that I recall. Not from me, no.  
19      **Q. Okay. Other than Bryant Patrick and**  
20 **Elgen Moore, did you ever see Alvin Jones or Watts plant**  
21 **drugs on anyone?**  
22      A. I don't know. I can't -- No.  
23      **Q. Ready to talk about the mailbox case?**  
24      A. Are you ready to talk about the mailbox case?

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Page 182	<p>1 marijuana. Did you sell marijuana, too?</p> <p>2 A. No.</p> <p>3 Q. All right. Cocaine and heroin?</p> <p>4 A. Yeah.</p> <p>5 Q. Any other controlled substances you sold?</p> <p>6 A. No.</p> <p>7 Q. Okay. So in 2004, who was your supplier for</p> <p>8 heroin?</p> <p>9 A. I used to get heroin from my cousin.</p> <p>10 Q. What's your cousin's name?</p> <p>11 A. Eddie Baker.</p> <p>12 Q. Did you have any -- In 2004, did you have any</p> <p>13 other supplier for that narcotic other than Eddie Baker?</p> <p>14 A. Maybe if he didn't have none, there probably</p> <p>15 was somebody here or there that did. I don't, like,</p> <p>16 recall who.</p> <p>17 Q. Where is Eddie Baker these days?</p> <p>18 A. He living.</p> <p>19 Q. He's -- Is he a drug dealer --</p> <p>20 A. No.</p> <p>21 Q. -- or just a supplier?</p> <p>22 A. Neither.</p> <p>23 Q. Well, where would he get the drugs to give</p> <p>24 you?</p>	Page 184	<p>1 Q. Eddie Baker.</p> <p>2 Who supplied you with cocaine to sell during</p> <p>3 2004?</p> <p>4 A. It was a few people. Like, I know this guy</p> <p>5 named Polo. I got cocaine from him mainly.</p> <p>6 Q. During 2004, did you sell more heroin or more</p> <p>7 cocaine?</p> <p>8 A. I'm not sure.</p> <p>9 Q. Was it equal?</p> <p>10 A. I'm not sure.</p> <p>11 Q. Other than Polo, did anyone else supply you</p> <p>12 with cocaine during 2004?</p> <p>13 A. I believe somebody, yeah. But I can't recall.</p> <p>14 It was so long ago.</p> <p>15 Q. So the only one who you remember supplying you</p> <p>16 with cocaine to sell during 2004 was Polo?</p> <p>17 A. It was the constant. That's who I used to go</p> <p>18 to.</p> <p>19 Q. Okay. When is the last time you saw or had</p> <p>20 contact with Polo?</p> <p>21 A. I actually talked to Polo the other day</p> <p>22 because his friend died and he was trying to raise money</p> <p>23 for the funeral.</p> <p>24 Q. Is it, like, a GoFundMe page?</p>
Page 183	<p>1 A. That, I don't know.</p> <p>2 Q. Is -- Earlier in the dep, we were talking</p> <p>3 about David Baker, Bali. Is David Baker related to you?</p> <p>4 A. No. I have a cousin named David Baker.</p> <p>5 Q. All right. It's a different David Baker,</p> <p>6 right?</p> <p>7 A. Yeah, yeah. He live in Milwaukee.</p> <p>8 Q. And I don't know if I asked you this, but do</p> <p>9 you remember ballpark how old David Baker, aka Bali, is?</p> <p>10 A. No, I don't know how old Bali is.</p> <p>11 Q. Okay. All right. So, I'm sorry. David Baker</p> <p>12 would supply you with heroin or cocaine?</p> <p>13 MR. TEPFER: Objection.</p> <p>14 BY THE WITNESS:</p> <p>15 A. I never said --</p> <p>16 MR. TEPFER: Objection: misstates the testimony.</p> <p>17 MR. BAZAREK: Now I'm confused.</p> <p>18 MR. TEPFER: You said David Baker.</p> <p>19 MR. BAZAREK: What did I say?</p> <p>20 MR. TEPFER: You said David Baker.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. Who supplied you with heroin during 2004 that</p> <p>23 you would sell?</p> <p>24 A. Eddie. Eddie Baker.</p>	Page 185	<p>1 A. I don't know if it's a GoFundMe page. He</p> <p>2 called me off Facebook Messenger.</p> <p>3 Q. On Facebook, what does he go by? Polo?</p> <p>4 A. No. Mark.</p> <p>5 Q. What's Mark's last name?</p> <p>6 A. Holliman.</p> <p>7 Q. Can you spell it?</p> <p>8 A. H-O-L-L-I-M-A-N.</p> <p>9 Q. To your knowledge, does Mark Holliman still</p> <p>10 engage in narcotics activity?</p> <p>11 A. No. If he did, he wouldn't have been calling</p> <p>12 me trying to raise money for his friend's funeral.</p> <p>13 Q. Okay. All right. So let's go to the next</p> <p>14 month, July of '04. You know the police are looking for</p> <p>15 you, right?</p> <p>16 A. Okay.</p> <p>17 Q. And --</p> <p>18 MR. TEPFER: We've been going about an hour and ten</p> <p>19 minutes straight. I'm going to need a little</p> <p>20 five-minute break at some point soon.</p> <p>21 MR. BAZAREK: Do you want to break now?</p> <p>22 MR. TEPFER: Can we?</p> <p>23 MR. BAZAREK: Let's just break.</p> <p>24 THE VIDEOGRAPHER: The time is 3:03 p.m. We are</p>



In Re: Watts Coordinated Pretrial Proceedings  
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<p style="text-align: right;">Page 206</p> <p>1 A. That was the name of the drug line, the heroin</p> <p>2 line. Well, that was one of the names in the building.</p> <p>3 <b>Q. What was your drug line called?</b></p> <p>4 A. CPR.</p> <p>5 <b>Q. So what does that mean? Like, strong stuff</b></p> <p>6 <b>that's going to stop your heart?</b></p> <p>7 A. When you give people CPR, you're actually</p> <p>8 jumping their heart; ain't you? If you fell out right</p> <p>9 now and your heart stopped, I give you CPR, I'm</p> <p>10 resuscitating you.</p> <p>11 <b>Q. Right. But the reason you --</b></p> <p>12 A. I just thought it was clever.</p> <p>13 <b>Q. The reason you need CPR is because --</b></p> <p>14 A. Your heart stopped.</p> <p>15 <b>Q. -- your heart stopped?</b></p> <p>16 A. Yeah.</p> <p>17 <b>Q. Okay. What were the names of some of the</b></p> <p>18 <b>other drug lines?</b></p> <p>19 A. It was a lot of names of drug lines. I can't,</p> <p>20 like, remember them all over there. They -- But you had</p> <p>21 a lot of names. People get creative.</p> <p>22 <b>Q. All right. So was the CPR line, was that for</b></p> <p>23 <b>heroin?</b></p> <p>24 A. Yeah.</p>	<p style="text-align: right;">Page 208</p> <p>1 jail. I know it wasn't me.</p> <p>2 <b>Q. Would Bryant and Elgen sell both heroin and</b></p> <p>3 <b>cocaine for you?</b></p> <p>4 A. One would sell one, and the other would sell</p> <p>5 the other.</p> <p>6 <b>Q. Okay. So they were interchangeable?</b></p> <p>7 A. Yeah.</p> <p>8 <b>Q. Okay. So tell me other interactions that you</b></p> <p>9 <b>had with Watts or his team. You said you'd see them</b></p> <p>10 <b>every day, something -- words to that effect, right?</b></p> <p>11 A. Yeah.</p> <p>12 <b>Q. Okay. And that's because they worked down</b></p> <p>13 <b>there, right?</b></p> <p>14 A. If that's what you call work.</p> <p>15 <b>Q. And -- But you weren't arrested during those</b></p> <p>16 <b>times, right?</b></p> <p>17 A. Because I wasn't out there doing nothing.</p> <p>18 <b>Q. Well, you were next arrested on</b></p> <p>19 <b>March 23, 2005, correct?</b></p> <p>20 A. Yeah.</p> <p>21 <b>Q. Okay. So I want to focus on just -- I want to</b></p> <p>22 <b>go back to this time frame. Your case gets dismissed on</b></p> <p>23 <b>the Wednesday before Thanksgiving in 2004?</b></p> <p>24 A. Yeah.</p>
<p style="text-align: right;">Page 207</p> <p>1 <b>Q. What -- Did you have a name for your cocaine</b></p> <p>2 <b>line?</b></p> <p>3 A. Well, we had knockout.</p> <p>4 <b>Q. I've heard that one.</b></p> <p>5 A. I know you did.</p> <p>6 <b>Q. Did you call -- So you called your cocaine</b></p> <p>7 <b>knockout?</b></p> <p>8 A. Yeah, when I was selling it.</p> <p>9 <b>Q. Did any -- Now, could only you use that name,</b></p> <p>10 <b>or could other people use it?</b></p> <p>11 A. Only I could use it when I was selling. But</p> <p>12 when I stopped selling, it's free enterprise.</p> <p>13 <b>Q. Okay. So how long did you use the term</b></p> <p>14 <b>"knockout" for your cocaine that you sold?</b></p> <p>15 A. I don't know. I'm not sure.</p> <p>16 <b>Q. The cocaine that you --</b></p> <p>17 A. But I know it was still -- they was still</p> <p>18 saying knockout when I stopped. Even while I was in</p> <p>19 jail, they was still selling cocaine and calling it</p> <p>20 knockout. So I was in jail. I know it wasn't me.</p> <p>21 <b>Q. Was the cocaine --</b></p> <p>22 A. They was --</p> <p>23 <b>Q. Go ahead. Sorry. Go ahead.</b></p> <p>24 A. They was still selling CPR while I was in</p>	<p style="text-align: right;">Page 209</p> <p>1 <b>Q. Up to, let's say, March 22, 2005, at any time</b></p> <p>2 <b>during that time period, did you speak to any of the</b></p> <p>3 <b>officers on -- Strike that.</b></p> <p>4 <b>You've already talked about this conversation</b></p> <p>5 <b>that you had with Jones after your case was dismissed,</b></p> <p>6 <b>right?</b></p> <p>7 A. Right.</p> <p>8 <b>Q. So from -- from that day -- which was late</b></p> <p>9 <b>November, early December 2004 -- up through</b></p> <p>10 <b>March 22, 2005, did you ever speak with any members of</b></p> <p>11 <b>Watts's team?</b></p> <p>12 MR. TEPFER: Just object to the extent it</p> <p>13 mischaracterizes the testimony.</p> <p>14 But go ahead.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Just not, like, actual conversations with</p> <p>17 them. But they would say different things when they see</p> <p>18 me. "Oh, you still out here? Oh, you don't learn," or</p> <p>19 things of that nature.</p> <p>20 <b>Q. Who said that to you?</b></p> <p>21 A. All of them.</p> <p>22 <b>Q. Who is all of them?</b></p> <p>23 A. AJ, Watts. But Watts would just say it in</p> <p>24 passing, like -- But AJ would stand there, like, with</p>