

EXHIBIT 2



Transcript of the Deposition of
Clarissa Glenn

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: August 26, 2021

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

| | | |
|------------------------|---|-----------------------------|
| |) | No. 19-cv-1717 |
| |) | |
| |) | Judge Andrea R. Rood |
| |) | |
| In re: Watts |) | Magistrate Judge |
| Consolidated Pretrial |) | Sheila M. Finnegan |
| Conference Proceedings |) | |
| |) | Coordinated with: Jefferson |
| |) | v. City of Chicago, et al., |
| |) | No. 18-cv-5124 |

The deposition of CLARISSA GLENN, called for examination, taken via videoconference pursuant to the Federal Rules of Civil Procedure of the United States District Court pertaining to the taking of depositions, taken before MARY T. MURPHY McGUIRK, a Notary Public within and for the County of Cook, State of Illinois, and a Certified Shorthand Reporter of said state, at 10:00 a.m. on August 26, 2021.

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ALSO PRESENT:

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REPORTED BY: MARY T. MURPHY McGUIRK, CSR
Certificate No. 84-4160

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(Proceedings designated as
confidential were had.)

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1 (The following proceedings were
2 had not designated as confidential:)

3 THE VIDEOGRAPHER: For the record, my name is
4 Joe Beile of Video Instanter. I'm the video
5 recording device operator for this deposition.
6 Our business address is 134 North LaSalle Street,
7 Suite 1400, Chicago, Illinois 60602.

8 This remote deposition is being video
9 recorded pursuant to the Federal Rules of Civil
10 Procedure and all other applicable rules.

11 This is the deposition of Clarissa Glenn
12 being taken In re: Watts Coordinated Pretrial
13 Proceedings, Case No. 19 CV 1717, in the
14 United States District Court for the Northern
15 District of Illinois, Eastern Division.

16 Today's date is August 26, 2021, and the
17 time is 10:08 a.m.

18 Will the witness please identify yourself
19 for the record by stating your name and location,
20 please?

21 THE WITNESS: Clarissa Glenn. 311 North
22 Aberdeen.

23 THE VIDEOGRAPHER: This deposition is being
24 video recorded at the instance of the defendant and

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1 is being taken on behalf of the defendant.

2 Would the participants of this
3 videoconference please introduce themselves for
4 the record by stating your name, location, and who
5 you represent, please.

6 MR. TEPFER: Good morning. Josh Tepfer,
7 T-e-p-f-e-r, for plaintiff Clarissa Glenn. I'm
8 with the witness at Loevy & Loevy.

9 MR. PALLES: Eric --

10 MR. FLAXMAN: Good morning. This is Joel
11 Flaxman for the Flaxman plaintiffs.

12 Sorry, Eric.

13 MR. PALLES: Eric Palles for Kallatt Mohammed.

14 MS. OLIVIER: Kelly Olivier on behalf of the
15 individual defendants represented by Hale & Monico.

16 MR. BURNS: Terrence Burns on behalf of the
17 City of Chicago and the other defendants
18 represented by Reiter Burns.

19 MR. KOSOKO: Ahmed Kosoko on behalf of Ronald
20 Watts.

21 MR. ZIBOLSKI: Kevin Zibolski on behalf of
22 Cadman and Spaargaren.

23 MR. ZECCHIN: I'm Anthony Zecchin on behalf of
24 individual defendants other than Cadman and

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1 Spaargaren for Hale & Monico.

2 THE VIDEOGRAPHER: Would the court reporter
3 please introduce themselves and please swear in the
4 witness?

5 THE REPORTER: Good morning. My name is Mary
6 McGuirk. I'm with Royal -- sorry -- Royal
7 Reporting Services.

8 Ms. Glenn, could you please -- please
9 raise your right hand? I'll swear you in.

10 (The witness was duly sworn.)

11 MS. OLIVIER: Let the record reflect that this
12 is the deposition of Clarissa Glenn being taken
13 pursuant to notice and agreement of the parties,
14 in accordance with the Federal Rules of Evidence
15 and Civil Procedure and all applicable local
16 rules in the Watts Coordinated Pretrial Proceedings
17 under Case No. 19 CV 1717, pending before
18 Judge Valderrama in the United States District
19 Court for the Northern District of Illinois.

20 This deposition is being taken via Zoom
21 and is being video recorded.

22
23
24

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1 CLARISSA GLENN,
2 called as a witness herein, having been first duly
3 sworn, was examined and testified via videoconference as
4 follows:

5 EXAMINATION

6 BY MS. OLIVIER:

7 Q. Good morning, Ms. Glenn. My name is Kelly
8 Olivier. As you probably just heard me say, I am from
9 the firm Hale & Monico and represent a number of the
10 individual defendants in this litigation.

11 Before we begin, have you ever given a
12 deposition before?

13 A. No.

14 Q. I'm sure that your attorney went over this
15 with you. But just to kind of go over some ground
16 rules, as you can see, this is kind of a unique
17 situation in that we're not face-to-face in person. We
18 are remote via Zoom. Because of that and because of the
19 constraints of Zoom, we need to make sure that we are
20 not speaking over one another.

21 Mary McGuirk, who I'm sure you probably
22 see on your screen, is our court reporter. And if we're
23 talking over one another, it's not going to be a clear
24 record. So I'll do my best to allow you to fully answer

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1 a question that I ask before I ask you another question.
2 I just ask that you allow me to fully ask my question,
3 even if you know where I'm going with it, before you
4 begin your answer. Is that fair?

5 **A.** Yes.

6 **Q.** Okay. You're already doing a great job by
7 answering out loud. The court reporter can't take down
8 nods of the head, shakes of the head, and uh-huh and
9 uh-uh look the same on the record. So if an answer
10 calls -- or excuse me. If a question calls for a yes or
11 a no answer, please make sure you answer out loud,
12 verbally with a yes or no. Okay?

13 **A.** Okay.

14 **Q.** Lastly, if you do not understand a question
15 that I ask you, please let me know. I'll go ahead and
16 try to rephrase. If you answer a question that I ask, I
17 am going to assume that you understood it. Can we have
18 that understanding?

19 **A.** Yes, we do.

20 **Q.** Okay. I do expect this to be a longer
21 deposition today. So I'll try to be mindful of taking
22 breaks. But if you need to take a break at any time,
23 please just let me know. However, the only caveat to
24 that is that if a question is pending, please answer the

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1 question before we go on our break. All right?

2 **A.** Okay.

3 **Q.** All right. Now, Ms. Glenn, I believe you
4 stated before you are located at 311 North Aberdeen for
5 today's deposition?

6 **A.** Yes.

7 **Q.** Is anyone present in the room with you?

8 **A.** Yes.

9 **Q.** Who is with you?

10 **A.** Josh Tepfer.

11 **Q.** And is Josh Tepfer the attorney representing
12 you today?

13 **A.** Yes.

14 **Q.** Did you bring any materials to assist you
15 today for this deposition?

16 **A.** No.

17 **Q.** Is there anything on your computer screen
18 other than the Zoom screen?

19 **A.** No.

20 **Q.** Without going into the substance of any
21 conversations that you had with your attorney, did you
22 speak with your attorney in preparation for today's
23 deposition?

24 **A.** No.

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1 Q. Did you meet with your -- did you meet with
2 your attorneys prior to today's deposition to prepare?

3 A. Yes.

4 Q. How many times did you meet with your
5 attorneys to prepare for this deposition?

6 A. Once.

7 Q. When was that?

8 A. Tuesday, just past.

9 Q. Tuesday this past week, so two days ago?

10 A. Yes.

11 Q. Where did that meeting take place?

12 A. My home.

13 Q. Where is your home located?

14 A. 6540 South Vernon, Chicago, Illinois 60637.

15 Q. How long did that meeting last for?

16 A. Probably an hour, hour and a half maybe.

17 Q. Besides that in-person meeting with your
18 attorneys, did you have any telephone conversations with
19 your attorneys in preparation for today's deposition?

20 A. No.

21 Q. Did you review any documents in preparation
22 for today's deposition?

23 A. Yes.

24 Q. What documents did you review?

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1 **A.** My COPA document.

2 **Q.** I'm going to now pull up and mark this as
3 Exhibit 1.

4 (C. Glenn Deposition Exhibit
5 No. 1 marked for identification.)

6 BY MS. OLIVIER:

7 **Q.** Ms. Glenn, can you see what's on my screen --
8 or see what I've shared on the screen?

9 **A.** Yes.

10 **Q.** Is this the COPA document that you reviewed in
11 preparation for today?

12 Here, I'll -- I'll just keep it on the
13 first page for now.

14 **A.** Yes.

15 **Q.** And for the record, this is, as I said before,
16 Exhibit 1. It's titled "COPA Investigative Report," Log
17 Number 1087742, 1089229, and 1089231. It's a report by
18 Investigator Masters, dated November 28th, 2018. And
19 the subject is the interview of complainant and witness
20 Clarissa Glenn.

21 This document -- I'm just going to scroll
22 through. The actual report itself is ten pages; is that
23 accurate to -- does that ring true to you, Ms. Glenn?

24 **A.** Yes.

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1 **Q.** Did you also review the accompanying exhibits
2 to this COPA Investigative Report?

3 **A.** I don't understand.

4 **Q.** Is -- I'm sharing with you page 11 of 19 of
5 Exhibit 1, COPA Watts -- Bates-stamped COPA Watts
6 016356.

7 Do you see that this is an image of Ida B.
8 Wells, like a map, essentially?

9 **A.** Yes. That -- that image was attached, yes.

10 **Q.** Okay. So that's basically my question.

11 **A.** Oh.

12 **Q.** Did you review the attachment of the
13 investigative report as well?

14 **A.** No.

15 **Q.** Okay. Did you -- you did not look at these
16 images?

17 **A.** No.

18 **Q.** Okay. So you reviewed solely the report,
19 which is -- would be ten pages of -- that's a written
20 document that was authored by a COPA investigator?

21 **A.** I actually reviewed eight pages of the COPA
22 investigation report.

23 **Q.** Okay. Did you stop -- did you not complete
24 your -- a full review of the document?

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1 **A.** Correct.

2 **Q.** Okay. Which page did you stop at?

3 **A.** Can you go -- scroll up?

4 **Q.** Sure. I'll start at the beginning. Okay?

5 **A.** Okay.

6 **Q.** All right. So this is page 1. Did you review
7 page 1 of the COPA Investigative Report?

8 **A.** Yes, I did.

9 **Q.** Okay. While we're here, did you notice any
10 inaccuracies or changes that you want to make to any of
11 the information contained in this report?

12 **A.** Hold on.

13 (Short pause.)

14 BY THE WITNESS:

15 **A.** That is -- that's fine.

16 BY MS. OLIVIER:

17 **Q.** Okay. Moving to page 2, did you review this
18 page of the COPA report in preparation for today?

19 **A.** Yes.

20 **Q.** Okay. In your review of the second page of
21 the COPA report, did you notice any inaccuracies or any
22 information that you wanted to correct?

23 **A.** Yes, I -- I did want to make some changes.

24 **Q.** Okay.

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1 **A.** So we're --

2 **Q.** You go ahead and tell me.

3 **A.** Where, at the last paragraph?

4 **Q.** Okay. Starting with, "Glenn recalled waking
5 up early in the morning."

6 **A.** Yes. And I'm going to tell you what sentence
7 we're going to start at.

8 **Q.** Sure.

9 **A.** So we're going to start at sentence 8 where it
10 says, "decided."

11 **Q.** One second. What is the first words of the
12 sentence, if you could just start reading it aloud so I
13 can go there?

14 **A.** "Decided."

15 **Q.** The first word is "decided"?

16 **A.** Yes.

17 **Q.** I'm just not seeing it. Could you read the
18 sentence before?

19 **A.** It's right under "Program." It says, "decided
20 to stop quickly."

21 **Q.** Oh. Got you. Okay. Yes. Okay.

22 **A.** So --

23 **Q.** Let us know -- I was looking at the sentences
24 in terms of periods.

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1 So just so we can be complete, this is the
2 sentence that states, "Glenn remembered that Baker had
3 learned that Watts was looking to arrest him, and they
4 decided to stop quickly at the residence and then check
5 into a hotel?"

6 Is that the sentence we're both talking
7 about?

8 **A.** Yes.

9 **Q.** Okay. What did you want to change?

10 **A.** Where it says "where we stopped quickly at our
11 residence."

12 **Q.** Okay.

13 **A.** We did not -- we did not go to the residence.

14 **Q.** Okay. So then the next -- I'm just going to
15 read on because that affects some of the other
16 information contained in this paragraph.

17 It says, "Glenn did not remember how Baker
18 had received this information, but he thought he may
19 have received a telephone call. When they arrived at
20 527 East Browning, Glenn went upstairs with the children
21 while Baker remained in the lobby speaking with some
22 acquaintances?"

23 With respect to that sentence, that you
24 went upstairs with the children while Baker remained in

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1 the lobby, did you want to make any changes to that?

2 **A.** Yes.

3 **Q.** Okay. And what would be the changes?

4 **A.** Where it says, "When they."

5 **Q.** Yes.

6 **A.** The line where it says, "Baker had received
7 the information but thought he may have received a
8 telephone call."

9 **Q.** Yes.

10 **A.** And then there's a period.

11 **Q.** Yes.

12 **A.** "When they arrived at 527 East Browning," when
13 it start from "when," continue. "Glenn went upstairs
14 with the children while Baker remained in the lobby
15 speaking with some acquaintance." We're going to take
16 all of that out.

17 **Q.** Okay. Now, just so I'm clear, is the reason
18 why you're wanting to take that entire sentence out
19 because you did not say that to the COPA investigator?

20 **A.** No. I feel that it was not worded correctly.

21 **Q.** Okay. So going back actually to the previous
22 sentence, you had wanted to take out that -- the
23 phrasing that Glenn and Baker decided to stop quickly at
24 their residence.

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1 What is your reasoning for wanting to
2 remove that? Do you believe that the COPA investigator
3 took -- took down that information incorrectly?

4 **A.** I -- I -- I can't assume for them.

5 **Q.** Okay.

6 **A.** I cannot.

7 **Q.** Okay. And actually, let's back up just one
8 bit. Do you remember speaking with COPA
9 investigators --

10 **A.** Vaguely.

11 **Q.** -- on November 28th, 2018?

12 **A.** Vaguely.

13 **Q.** Okay. Do you remember being present at your
14 attorneys' offices at the same location where you were
15 today and meeting with them from approximately 1:15 p.m.
16 to 4:15 p.m.?

17 **A.** Vaguely.

18 **Q.** This interview with COPA investigators was not
19 recorded, either via video or via audio. Is there a
20 reason why you did not agree to have this interview
21 recorded via audio?

22 MR. TEPFER: Objection to the extent it calls
23 for an attorney-client communication.

24 If you can answer without revealing

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1 attorney-client communications, Clarissa, you can
2 answer.

3 BY THE WITNESS:

4 A. Why didn't I ask? That was the question?

5 BY MS. OLIVIER:

6 Q. Is there a reason why you did not agree to
7 have this interview audio or video recorded?

8 MR. TEPFER: Same objection.

9 You can answer if you can answer without
10 revealing attorney-client communications that me
11 and you or you or one of your attorneys had.

12 BY THE WITNESS:

13 A. I'm going to decline that question.

14 BY MS. OLIVIER:

15 Q. Is the reason you're declining because it's
16 subject to attorney-client privilege?

17 A. Yes.

18 MS. OLIVIER: Are you asserting the privilege,
19 or, Josh, are you asserting -- I guess I'm confused
20 over why we're not answering it.

21 MR. TEPFER: She's asserting --

22 BY THE WITNESS:

23 A. I am. I am --

24 MR. TEPFER: -- the privilege.

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1 BY THE WITNESS:

2 A. -- myself.

3 BY MS. OLIVIER:

4 Q. Okay. So without getting into the substance
5 of the reason why you didn't, that decision was made
6 following conversations with your attorneys?

7 A. What conversation?

8 Q. Did you discuss with your attorneys the fact
9 that you would be speaking with COPA investigators?

10 MR. TEPFER: Objection.

11 Do not answer that question. That's
12 attorney --

13 MS. OLIVIER: Sure.

14 BY MS. OLIVIER:

15 Q. Did you prepare for your interview with COPA
16 investigators with your attorneys?

17 A. No.

18 Q. Okay. The COPA investigators would have asked
19 if they could have -- were you present when the COPA
20 investigators asked if they could record the interview
21 with you?

22 A. I do not remember them asking.

23 Q. Okay. So going back to page 2, where we're at
24 in this last paragraph that we're discussing, is it your

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1 testimony that you did not tell COPA investigators
2 that Glenn remembered that Baker had learned that Watts
3 was looking to arrest him, and they decided to quickly
4 stop at their residence and check into a hotel?

5 **A.** That is incorrect. What I said was that after
6 we -- Glenn remembered that Baker had learned that Watts
7 was looking to arrest him, and they decided to check in
8 a hotel, that is correct. But to stop quickly at their
9 residence, that is not correct.

10 **Q.** Okay. So being more precise with my question,
11 is it your testimony that you did not tell COPA
12 investigators that they decided to stop quickly at the
13 residence?

14 **A.** Correct.

15 **Q.** Okay. Now, the next sentence that starts
16 with, "When they arrived at 527 East Browning, Glenn
17 went upstairs with the children while Baker remained in
18 the lobby speaking with some acquaintances," is it your
19 testimony that you did not give that -- or tell that
20 information to the COPA investigators?

21 **A.** Correct.

22 **Q.** Are there any other sentences contained within
23 this paragraph that you did not say to the COPA
24 investigators?

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1 any police officers in the lobby, and no one chased
2 Baker out of the building as Baker walked to their car.
3 Glenn did not see Baker with narcotics and did not see
4 Baker place any narcotics in their mailbox, period."

5 Is that the entire portion that we're
6 talking about?

7 **A.** Correct.

8 **Q.** All right. Now, is it your testimony that you
9 did not give this information to the COPA investigators?

10 **A.** I think that the wording is incorrect.

11 **Q.** Okay. What is incorrect about the wording?

12 **A.** So basically what happened was, I picked Ben
13 up from his community service. We went and picked up
14 the boys from school. We actually went to a clothing
15 store to get swimwear, and we went to check in to the
16 Hyatt Hotel at McCormick.

17 **Q.** So this information contained within this
18 paragraph that you went to your home at 527 East
19 Browning first, you're stating you did not give this
20 information to the COPA investigators?

21 **A.** It did not happen at that time, no.

22 **Q.** The question I'm asking is a little bit
23 different.

24 Did you tell the COPA investigators the

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1 information that's contained within this paragraph?

2 MR. TEPFER: Objection, asked and answered and
3 vague.

4 You can answer, if you understand.

5 BY THE WITNESS:

6 A. It did not happen in that order.

7 BY MS. OLIVIER:

8 Q. So what I'm asking, though, is, did you
9 tell -- is it your testimony that the information that's
10 contained within this paragraph, you did not state that
11 to COPA investigators?

12 A. I did state that. It's just incorrect order.

13 Q. Okay. So while you did tell the COPA
14 investigators this information, that is -- it's your
15 testimony today that that is not what happened?

16 MR. TEPFER: Objection, mischaracterizes the
17 testimony.

18 Go ahead. You can answer, if you
19 understand.

20 BY THE WITNESS:

21 A. I don't -- I don't understand. She's trying
22 to --

23 MR. TEPFER: You have to speak up.

24 BY THE WITNESS:

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1 **A.** I don't understand what you're saying because
2 you're ask- -- I don't understand what you're saying.

3 BY MS. OLIVIER:

4 **Q.** You admit that the information contained
5 within this paragraph, you did give to COPA
6 investigators, and that's why it's contained in this
7 report, correct?

8 **A.** Correct.

9 **Q.** Today you're stating that you had an
10 opportunity to review this report, and after reviewing
11 this report, this information is wrong?

12 MR. TEPFER: Objection, mischaracterizes the
13 testimony.

14 Go ahead.

15 BY THE WITNESS:

16 **A.** The information is incorrect as the order it
17 is in.

18 BY MS. OLIVIER:

19 **Q.** Okay. What would be the correct order in
20 terms of when you went to your family residence on
21 June 17th, 2004?

22 **A.** I don't believe that -- no, we did not go to
23 the residence as a family on 2004 on this date. It was
24 after we checked out the hotels, we went back to the

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1 restaurant -- I mean, to the residence, Ben and myself.

2 Q. Would this have been the next day, on
3 June 18th, 2004, that you checked out?

4 A. No. No. No.

5 Q. Okay. All right. And we'll get into -- we'll
6 do a deeper dive into the events that took place back in
7 2004 a little bit later.

8 I guess, for now, I'm just trying to
9 determine why there are inaccuracies and why there are
10 corrections that need to be made to this report. Okay?

11 A. Okay.

12 Q. So did you review Ben Baker's COPA
13 Investigative Report?

14 A. No.

15 Q. Okay. What made you realize that you were
16 incorrect when you told the COPA investigators that
17 these events took place on June 17th, 2004?

18 MR. TEPFER: Objection, mischaracterizes the
19 testimony.

20 Go ahead.

21 BY THE WITNESS:

22 A. I have no answer for that, your question.

23 BY MS. OLIVIER:

24 Q. Well, you spoke with the COPA investigators in

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1 November of 2018. Did you have an opportunity to review
2 this report anytime after that?

3 A. I don't recall.

4 Q. When was the first time you saw a copy of this
5 report?

6 A. Tuesday, just past, two days ago.

7 Q. Okay. Was it at that time, when reading it,
8 that you realized that there was information that was
9 incorrect?

10 A. That time was Wednesday, which was yesterday
11 when I looked over the report.

12 Q. Okay. So you've looked at this report --

13 A. Yesterday.

14 Q. -- multiple times?

15 A. No.

16 Q. Did you review this report with your attorneys
17 on Tuesday?

18 MR. TEPFER: Objection. That is
19 attorney-client privilege.

20 MS. OLIVIER: She's allowed to tes- -- I'm not
21 asking her about any conversations you had. She
22 can say what documents she looked at when she met
23 with you.

24 MR. TEPFER: That's true. Correct.

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1 You can answer that question to the extent
2 you don't reveal communications.

3 BY THE WITNESS:

4 **A.** He said -- gave me this report and said this
5 is the report from COPA.

6 BY MS. OLIVIER:

7 **Q.** Did you review that report with your
8 attorneys -- without getting into what you talked about,
9 did you review that report with your attorneys present?

10 **A.** No. Again no.

11 **Q.** When was the first time that you actually went
12 through and read this report?

13 **A.** I answered.

14 **Q.** I'm unclear, so that's why I asked the
15 question again.

16 When was the first time that you reviewed
17 this report?

18 **A.** Let me think on that. Yesterday, which was
19 Wednesday.

20 **Q.** Okay. You received the report from your
21 attorneys on Tuesday. But you did not read the report
22 until yesterday, Wednesday?

23 **A.** Correct.

24 MR. TEPFER: Objection, asked and answered.

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1 BY MS. OLIVIER:

2 Q. It was at that time that you noticed that
3 there was incorrect information that you gave to the
4 COPA investigators, correct?

5 MR. TEPFER: Objection, mischaracterizes the
6 testimony.

7 Go ahead.

8 BY THE WITNESS:

9 A. Incorrect.

10 BY MS. OLIVIER:

11 Q. Okay. What is incorrect about my statement?

12 A. You said I gave incorrect information.

13 Q. I guess I'm confused because the reason why
14 we're going through this is that you're saying that the
15 information that's contained here is wrong because you
16 are talking about what you did on June 17th, 2004, in
17 this paragraph.

18 A. And I am saying that I am kind of confused
19 from what your -- your questions that you're asking and
20 flipping around about this same particular paragraph
21 that you're speaking of, and I stated already to the
22 answers, and I don't know. So we're -- I'm -- I'm lost.

23 Q. The information that you're saying is -- that
24 I need to cross out pertains to the sequence of events

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1 that you and Mr. Baker and your children did on
2 June 17th, 2004. Can we agree on that?

3 **A.** No, we cannot agree on your question.

4 **Q.** The paragraph we're talking about is outlining
5 events that took place on June 17th, 2004, agreed?

6 **A.** On what day? What month? What day?

7 **Q.** The paragraph starts with outlining what took
8 place on the date of June 17th, 2004, agreed?

9 **A.** Agreed.

10 **Q.** Reading through that paragraph, you are
11 indicating for the record that there is information that
12 needs to be removed because it is incorrect; is that
13 true?

14 **A.** What I'm saying -- no. It's untrue. It did
15 not happen in that sequence. That's true.

16 **Q.** Okay. Because you're saying that these
17 portions that you're seeking to remove did not take
18 place on June 17th, 2004?

19 **A.** Correct.

20 **Q.** You did tell this information, though, to the
21 COPA investigation -- to the COPA investigators when you
22 spoke with them in 2018, though, correct?

23 **MR. TEPFER:** Objection to vague, "this
24 information."

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1 But go ahead.

2 BY THE WITNESS:

3 A. You skipped from 2004 -- and I apologize. You
4 skipped from 2004 to 2018?

5 BY MS. OLIVIER:

6 Q. Sure. So this --

7 A. Okay.

8 Q. -- document that we're talking about was
9 created after you interviewed with COPA investigators on
10 November 28th, 2018.

11 A. Okay.

12 Q. And it's your testimony -- or strike that.

13 All of the information contained within
14 this paragraph is information that you gave to COPA
15 investigators when you interviewed with them in 2018,
16 correct?

17 A. I don't recall the interview in 2018. I'd
18 have to see the report.

19 Q. Do you think that the COPA investigators made
20 up this sequence of events?

21 MR. TEPFER: Objection, argumentative.

22 You can answer, if you can.

23 BY THE WITNESS:

24 A. Did COPA make up what's in this paragraph? Is

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1 that what you're asking?

2 BY MS. OLIVIER:

3 Q. Yes.

4 A. I don't believe that they made up what's in
5 the paragraph --

6 Q. Do you think --

7 A. -- no.

8 Q. Do you think that they took down the
9 information that you gave them incorrectly?

10 A. Yes.

11 Q. Okay. Besides the sentences that we've
12 already gone over, is there any other information
13 contained within -- or within page 2 of the COPA
14 Investigative Report that you believe is inaccurate or
15 needs to be changed?

16 A. No.

17 Q. I'm now going to page 3. Did you have an
18 opportunity to -- is page 3 one of the pages that you
19 reviewed in preparation for today's deposition?

20 A. Yes.

21 Q. Was there any information contained on page 3
22 that is -- that you believe is inaccurate or needs to be
23 changed?

24 (Short pause.)

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1 BY THE WITNESS:

2 **A.** We can start off with the first paragraph,
3 where it says, "After leaving 527 East Browning, Glenn,
4 Baker, and the children drove to the Hyatt."

5 We did not. That's incorrect.

6 BY MS. OLIVIER:

7 **Q.** And similar --

8 **A.** We did not -- we did not leave from 527 East
9 Browning to go to the Hyatt. We actually left from a
10 clothing store to go to the Hyatt, where we checked in.

11 **Q.** Similar to the questions I asked you about the
12 statements that you wanted to correct on page 2, with
13 respect to the statement on page 3, "After leaving 527
14 East Browning," is it your testimony that you did not
15 tell the investigators that information?

16 **A.** I'm sorry. I was still reading. I thought
17 you wanted me to go through this. What -- what was your
18 question?

19 **Q.** Is it your testimony that you did not tell
20 COPA investigators the phrase -- the information that,
21 after leaving 527 East Browning, you proceeded to the
22 Hyatt with Mr. Baker and your children?

23 **A.** Correct.

24 **Q.** Okay. So because you did not tell the COPA

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1 investigators that information, do you believe that they
2 made this information up?

3 MR. TEPFER: Objection, argumentative.

4 Go ahead.

5 BY THE WITNESS:

6 A. My belief of what they wrote or -- I have no
7 answer for that.

8 BY MS. OLIVIER:

9 Q. Did they -- so -- but it is your testimony
10 that you did not tell them that you proceeded to the
11 Hyatt after leaving 527 East Browning?

12 A. Correct.

13 Q. Okay. Is there any other information
14 contained on page 3 that you believe is inaccurate and
15 needs to be changed?

16 (Short pause.)

17 BY THE WITNESS:

18 A. That's fine.

19 BY MS. OLIVIER:

20 Q. Okay. So the only portion that -- of page 3
21 that you would like removed or that you're stating is
22 not correct is the "After leaving 527 East Browning"
23 portion?

24 A. Correct.

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1 **Q.** Moving to page 4 of the COPA Investigative
2 Report, is there any information that's contained on
3 page 4 that you believe is inaccurate or needs to be
4 changed?

5 **A.** Can you scroll up -- can you scroll up just a
6 little more?

7 **Q.** Sure.

8 **A.** Or down. Down. I'm sorry. Okay. Thank you.
9 That's fine.

10 **Q.** So there are no changes or inaccuracies that
11 you see on page 4 of the COPA Investigative Report?

12 **A.** Correct.

13 **Q.** And I should have asked, do you -- did you
14 have an opportunity to review page -- pages 3 and 4
15 before coming here today?

16 **A.** I reviewed it yesterday, Wednesday.

17 **Q.** Okay. I'm moving to page 5. Did you review
18 page 5 yesterday?

19 **A.** Yes.

20 **Q.** Are there any changes or inaccuracies
21 contained on page 5?

22 **A.** Can you scroll -- scroll down a little?

23 **Q.** Sure. Sorry. I'm trying to get -- let me see
24 if I can --

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1 **A.** That's fine. Okay.

2 **Q.** I'll go up just a little bit.

3 Oh, sorry.

4 **A.** Yes. We're going to go to that first
5 paragraph, and we're going to start off, the first
6 sentence is "The," but it's the sentence that has
7 "51st Street, period."

8 MR. TEPFER: So it's not the first full
9 paragraph.

10 THE WITNESS: Okay.

11 MR. TEPFER: It's the first paragraph on the
12 page.

13 BY MS. OLIVIER:

14 **Q.** Okay. Three lines up, "51st Street"?

15 **A.** Correct.

16 **Q.** Okay.

17 **A.** "The arresting officers later returned
18 to Glenn apartment. The officers arrested" --
19 "asserted" -- I'm sorry -- "to Glenn that they left a
20 flashlight and needed a" -- "needed to search her
21 apartment again to find it, but Glenn was openly
22 skeptical of the officers' reasons for returning to her
23 home."

24 That's incorrect.

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1 investigative report?

2 **A.** I'm sorry. You said the two sentence that
3 what?

4 **Q.** The last two sentences of the first paragraph
5 on the page, those were the on- -- there are no other
6 inaccuracies or corrections that need to be made to page
7 5?

8 **A.** Correct.

9 **Q.** Going to page 6 of the COPA Investigative
10 Report, did you have an opportunity to read this
11 yesterday?

12 **A.** Yes.

13 **Q.** Please let me know if there are any
14 corrections or changes or inaccuracies on page 6.

15 (Short pause.)

16 BY THE WITNESS:

17 **A.** This is fine.

18 BY MS. OLIVIER:

19 **Q.** All right. So there are no corrections that
20 need to be made to page 6 of the COPA Investigative
21 Report?

22 And before I go to page 7, what -- did you
23 receive a physical copy of the COPA report on Tuesday,
24 or was it via e-mail or --

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1 **A.** Oh, phys- -- paper, physical. Yes.

2 **Q.** Did you mark on your copy these corrections or
3 inaccuracies that you noted?

4 **A.** Yes.

5 **Q.** Okay. I would ask that you keep that and --
6 keep a copy of that.

7 MS. OLIVIER: And we'd like that produced to
8 us as well, Josh.

9 BY MS. OLIVIER:

10 **Q.** Going to -- and did you also make any
11 additional notes, or did you keep all of your notes on
12 the document itself?

13 **A.** I just kept little remarks on the document
14 itself.

15 **Q.** Okay. Please do not destroy that. Keep ahold
16 of it, and we'd like to have that produced.

17 All right.

18 MR. TEPFER: We will -- Clarissa, don't --
19 just try and keep it, or you can give it to me and
20 we'll deal with that later.

21 BY MS. OLIVIER:

22 **Q.** Do you have that document with you today?

23 **A.** No.

24 **Q.** Okay. Looking at page 7 of the COPA

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1 Investigative Report, was this one of the pages that you
2 reviewed in preparation for today as well?

3 **A.** Yes.

4 **Q.** All right. If you can -- same with the other
5 pages, please identify and notify us of any corrections,
6 inaccuracies, changes that need to be made.

7 **A.** So we're going to go to the second paragraph.

8 **Q.** Sure.

9 **A.** We're going to go to the third "Glenn" at the
10 beginning of the sentence.

11 **MR. TEPFER:** It looks like the second full
12 paragraph, just for the record.

13 **BY THE WITNESS:**

14 **A.** And it says, "Glenn replied yes. Glenn said
15 that Patrick told her he had been looking out of a
16 window at 527 East Browning and that he had seen
17 Sergeant Watts pull the drugs out of his sleeve." 5 --
18 I believe -- it was 511, not 527.

19 **BY MS. OLIVIER:**

20 **Q.** Is that the only correction that needs to be
21 made with respect to the sentences you just read?

22 **A.** For that one particular sentence, yes.

23 **Q.** Okay.

24 (Short pause.)

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1 BY THE WITNESS:

2 A. So we're going to go to the last paragraph.

3 BY MS. OLIVIER:

4 Q. Okay.

5 A. And we're going to go to the third sentence
6 from the bottom.

7 Q. I am there.

8 A. Okay. It started off with -- oh, gosh.

9 "Glenn said that she did not associate
10 with anyone at 511 East Browning and would typically
11 enter that building only on Halloween."

12 We're going to scratch that out. That's
13 incorrect. "With her" -- "and with her children," we're
14 going to scratch that out. That's incorrect.

15 Q. That entire sentence?

16 A. From "enter that building only on Halloween
17 with her children," we're going to scratch that out.

18 Q. Okay. And why are we scratching that out?
19 What is inaccurate about that?

20 A. I would not take my kids in any other
21 buildings for Halloween to knock on somebody's door for
22 trick-or-treating, for one; and two is, I would go
23 there. That's just incorrect.

24 Q. Okay. Is -- so before that portion that we're

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1 crossing out, the statement that "Glenn said that she
2 did not associate with anyone at 511 East Browning,"
3 that is accurate?

4 **A.** Correct.

5 **Q.** Okay. And the following, where it talks about
6 saying that there were times you entered that building,
7 your testimony is, absolutely not, I never went to
8 511 East Browning?

9 **A.** I did not state that.

10 **Q.** Okay. Then I'm sorry. You explain to me why
11 we're completely crossing that out.

12 **A.** No. We're crossing out only "on Halloween
13 with her children." That's what we were crossing out.

14 **Q.** Okay. Did you enter the 511 East Browning
15 building?

16 **A.** Yes, I did.

17 **Q.** Okay. And on what sorts of occasions would
18 you have entered the 511 East Browning building?

19 **A.** To pay rent.

20 **Q.** But as far as entering the building on -- only
21 on Halloween with your children, presumably for
22 trick-or-treating, you did not do that?

23 **A.** Correct.

24 **Q.** Okay. Is it your testimony that you did not

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1 give that information to COPA investigators?

2 **A.** I did not give them the information where it
3 says "only on Halloween with her children."

4 **Q.** So this made it -- do you know how that could
5 have possibly made it into this report?

6 **A.** I do not know.

7 **MR. TEPFER:** Objection, calls for speculation.

8 Go ahead.

9 You answered it. That's fine. I was
10 late.

11 **BY MS. OLIVIER:**

12 **Q.** Is there any other information contained on
13 page 7 of the COPA Investigative Report that is
14 incorrect, inaccurate, or needs to be changed?

15 **A.** No. Everything else is fine.

16 **Q.** Okay. So we have -- in the second full
17 paragraph, we changed the address from 527 to 511, and
18 then I have removed the "only on Halloween with her
19 children" from that last paragraph.

20 Okay. Moving to page 8 of the COPA
21 Investigative Report, did you have an opportunity to
22 read page 8 yesterday?

23 **A.** Yes.

24 **Q.** Were there any corrections that needed to be

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1 made, any inaccuracies or changes that you had with
2 page 8?

3 (Short pause.)

4 BY THE WITNESS:

5 A. So we're going to go to the first full
6 paragraph.

7 BY MS. OLIVIER:

8 Q. Starting with --

9 (Simultaneous crosstalk.)

10 BY MS. OLIVIER:

11 Q. I'm sorry. I just want to make sure I'm in
12 the right spot. Starting with "After Glenn and Baker
13 were arrested"?

14 A. Correct.

15 Q. Okay.

16 A. We're going to go to the line where it
17 start -- well, the line where it starts "chained to the
18 bench."

19 Q. Okay.

20 A. "Chained to the bench with a bag of narcotics
21 under his nose."

22 I did not see he waving a bag of narcotics
23 under anyone nose.

24 Q. So to read the full sentence, it states,

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1 "Glenn recalled that Sergeant Watts approached a
2 dark-skinned African-American man who was chained to the
3 bench, waved a bag of narcotics under his nose, and
4 asked if the man wanted to claim the drugs."

5 You would like the portion that reads,
6 "waved a bag of narcotics under his nose" removed?

7 **A.** Correct.

8 **Q.** All right. Did you not tell COPA
9 investigators that information?

10 **A.** No.

11 **Q.** Sorry. That was a poorly-worded question.

12 Is it your testimony that you never told
13 investigators that you observed Sergeant Watts wave a
14 bag of narcotics under a dark-skinned African-American
15 man's nose?

16 **A.** I stated -- or saw the -- Watts wave a plastic
17 bag that appeared to be narcotics, individual bags of
18 narcotics, waving it in front of the tall dark-skinned
19 African-American male face.

20 **Q.** Okay. So the -- what would need to be
21 corrected is that here it's saying under his nose. You
22 told investigators that it was in front of his face?

23 **A.** Correct.

24 **Q.** All right. Is there anything else on page 8

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1 that needs to be changed or is inaccurate?

2 (Short pause.)

3 BY THE WITNESS:

4 **A.** We're going to go -- go down, where it starts
5 off with "be," b-e, "typing the police report related to
6 Glenn and Baker -- Baker's arrest."

7 BY MS. OLIVIER:

8 **Q.** Yes.

9 **A.** And I apologize. We're going to go above --
10 the sentence above that where it says, "Glenn and Baker
11 were chained to the bench and Officer Mohammed appeared
12 to be typing the police reports related to Glenn and
13 Baker arrest."

14 **Q.** Okay.

15 **A.** Give me one second.

16 **Q.** Sure.

17 **A.** It didn't happen in that -- that did not
18 happen in that order.

19 **Q.** Okay. So my first question is, is it your
20 testimony that the order as it's written here is not
21 what you told COPA investigators?

22 **A.** I told COPA investigate -- investigators that
23 information.

24 **Q.** Okay. But the way it's written here is in the

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1 incorrect order?

2 **A.** Correct.

3 **Q.** Okay. Explain to me what is incorrect about
4 it as it's written.

5 **A.** It's not in the correct order as it happened.

6 **Q.** Sure. What is the correct order?

7 **A.** The correct order should be officers that were
8 sitting at their desk or area were typing on Baker and
9 Glenn's arrest report while -- while Watts was
10 instructing what to say. Mohammed would be the last
11 officer to write on the report.

12 **Q.** Okay. So then the next sentence which states,
13 "Sergeant Watts and other officers were telling Officer
14 Mohammed what to type, and sometimes the other officers
15 would take Officer Mohammed's place and type on the
16 reports themselves."

17 Based off of what you just told me, that
18 would be an inaccurate sequence of events as well as
19 it's written here?

20 **A.** The sequence is inaccurate.

21 **Q.** Okay. Are there any other corrections,
22 changes, or inaccuracies on page 8?

23 (Short pause.)

24 BY THE WITNESS:

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1 **A.** Can you move it up so I can see that last
2 paragraph, please?

3 Okay. Thank you.

4 BY MS. OLIVIER:

5 **Q.** No problem.

6 **A.** That last paragraph would be incorrect.

7 **Q.** Which portion?

8 **A.** It would be friends -- we're going to start
9 off with "friend and with sitting in her car in the
10 parking lot of 527 East Browning. Officer Mohammed" --
11 it should be Officer Watts -- "came out of 527 East
12 Browning, approached Glenn vehicle." And then the next
13 sentence, it says, "Officer Jones soon walked out behind
14 Officer Mohammed." It should be Watts.

15 **Q.** And then just to -- because that stops off in
16 the middle of the sentence, I'm going to scroll to
17 page 9, just so we can finish that paragraph up. Is the
18 remainder of that paragraph accurate?

19 **A.** Correct.

20 **Q.** So beyond changing Officer Mohammed's name to
21 Officer Watts's name, is the remainder of the
22 information contained within the last paragraph on
23 page 8 that goes into the first two lines of page 9
24 correct?

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1 MR. TEPFER: Objection, mischaracterizes prior
2 testimony.

3 BY THE WITNESS:

4 A. I answered it.

5 BY MS. OLIVIER:

6 Q. You have to answer the question I asked.

7 A. I did.

8 Q. You're saying -- so the only changes you --
9 I'm asking if the rest of the information contained in
10 that paragraph is correct besides changing Mohammed's
11 name to Watts's name.

12 MR. TEPFER: Objection -- well, go ahead.

13 BY THE WITNESS:

14 A. I answered.

15 MR. TEPFER: You can answer again, Clarissa.

16 BY THE WITNESS:

17 A. It's correct.

18 BY MS. OLIVIER:

19 Q. Okay. I'm noting that the first sentence of
20 this paragraph says, "Glenn also remembered being
21 approached by Officers Jones and Mohammed sometime in
22 2005," and then goes on to explain the scenario. Should
23 that be -- should Mohammed's name be changed to Watts in
24 that sentence as well?

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1 **A.** Which -- where are you at? I'm sorry.

2 **Q.** The first sentence of the last paragraph
3 before it begins to lay out the scenario that you've
4 corrected.

5 **A.** Correct.

6 **Q.** Okay.

7 **A.** It should be changed to Watts. Thank you.

8 **Q.** Okay. But other than that, no other
9 corrections to pages 8 or those first two lines of page
10 9?

11 **A.** Correct.

12 **Q.** Okay. Did you have an oppor- -- beyond the
13 first two lines of page 9, did you have an opportunity
14 to review page 9 in preparation for today's deposition?

15 **A.** You said in preparation to the dep- --

16 **Q.** Yes.

17 **A.** I -- I did not read it to prepare for the
18 deposition. It was given to me, and I just read it. I
19 didn't know I had to read it to prepare.

20 **Q.** Sure.

21 Did you read page 9 of the COPA
22 Investigative Report prior to appearing today?

23 **A.** I did.

24 **Q.** Okay.

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1 **Q.** Do you know how many -- or in your mind, how
2 many individuals worked under Watts during this time
3 period of 2004 to 2006?

4 **A.** In my mind, it would be the whole police
5 station on 51st and Wentworth.

6 **Q.** Beyond Watts, Alvin Jones, and Mohammed, were
7 there other officers -- you're saying that you don't
8 know any other officers' names that worked with those
9 individuals?

10 **A.** Correct.

11 **Q.** Are there any other Chicago police officers
12 that you associate -- that you can recall even giving a
13 description of what they looked like that you'd be able
14 to identify as being a member of what's being referenced
15 as his tactical team?

16 **A.** Yes. If I see a picture, yes.

17 **Q.** With specific reference to tactical team, I
18 take it you understand that the entire police station at
19 51st and Wentworth was not on Sergeant Watts's tactical
20 team, correct?

21 **A.** I would say that if you ask me a question,
22 I'll answer it honestly.

23 **Q.** Do you -- so do you know the number of -- when
24 you see Sergeant Watts's tactical team, how many

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1 individuals are you putting under that umbrella?

2 **A.** Oh, my goodness. Every -- again, everyone on
3 51st and Wentworth.

4 **Q.** More than five officers?

5 **A.** If that's how many officers worked at 51st and
6 Wentworth.

7 **Q.** I'm -- I'm asking you how many individual
8 faces you saw.

9 **A.** I -- I answered.

10 **Q.** So in this sentence, it's referencing the team
11 operating in the building, the 527 building?

12 **A.** Yes.

13 **Q.** How many different officers, in your mind,
14 worked in the 527 East Browning building during this
15 time period of 2004 to 2006?

16 **A.** Can you rephrase your question, please?

17 **Q.** Sure.

18 I'm just trying to figure out, it's
19 referencing a specific team, Sergeant Watts's tactical
20 team, and I understand from your perspective, everyone
21 worked for him out of the police station.

22 But as far as the police officers that you
23 actually saw operating in 527, what was the -- how many
24 individuals was that?

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1 **A.** I would -- an estimated guess would be
2 seven -- about seven to eight on an estimated guess.

3 **Q.** During this time period of 2004 to 2006, were
4 they always the same seven to eight officers, or were
5 there new faces coming in?

6 **A.** I saw different -- I saw other faces.

7 **Q.** Okay. Taking into account that there were an
8 additional number of faces that were coming in, do you
9 know how many total officers we're talking about that
10 would have been operating in the 527 building in --
11 between this time period of 2004 to 2006?

12 **A.** Cannot recall.

13 **Q.** Do you know if it would have been more or less
14 than 15 different officers?

15 **A.** Cannot recall.

16 **Q.** Are you able to give an estimate -- or sorry.
17 Strike that.

18 Are you able to give an educated guess, so
19 to speak, as to how many additional officers there would
20 have been besides the seven to eight?

21 **A.** My -- my first two response was educated, and
22 again, the third one is I cannot recall.

23 MR. TEPFER: Objection, calls for speculation.

24 BY MS. OLIVIER:

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1 **Q.** All right. So going back to the correction
2 that we're making with respect to this paragraph, it's
3 your testimony that you did not know the names of many
4 members. You just knew the names of these three
5 individuals that you've already stated.

6 Are there any other changes or corrections
7 that need to be made to page 9?

8 (Short pause.)

9 BY THE WITNESS:

10 **A.** That would be all.

11 BY MS. OLIVIER:

12 **Q.** Looking at this page, I'm noting that the
13 investigator wrote down that you categorized the
14 officers between an inner circle, and an inner circle
15 means upstairs officers and their names of these
16 officers that are written. They are Kenny Young,
17 Nichols, and Gonzalez.

18 Is it your testimony that you did not give
19 those names to the COPA investigators?

20 **A.** No. That's not what I'm saying, no.

21 **Q.** Okay. Because when I asked before if you knew
22 the names of any of the officers, you said you only knew
23 Watts, Jones, and Mohammed, but within this report,
24 there's three other officers' names here.

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1 So I'm just wondering, did the COPA
2 investigators mis- -- misstate what you told them, or do
3 you actually know the names of these officers as well?

4 MR. TEPFER: Objection, mischaracterizes the
5 prior testimony.

6 You can go ahead and answer.

7 BY THE WITNESS:

8 **A.** This been -- is from years back. So I'm going
9 to stick with the report and the corrections that were
10 made.

11 BY MS. OLIVIER:

12 **Q.** So let me ask you this. Kenny Young, do you
13 know -- are you stating that that officer was or was not
14 a member of Sergeant Watts's tactical team that operated
15 in 527?

16 **A.** He was part of Watts's team, yes.

17 **Q.** So that is an officer whose name you know?

18 **A.** That I'm familiar appearing through these
19 years, yes.

20 **Q.** And that's an officer whose name you gave to
21 the COPA investigators?

22 **A.** I'm assuming so, yes.

23 **Q.** Okay. Nichols, is that another officer whose
24 name you gave to the COPA investigators as being one of

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1 the individuals who worked and operated in the 527
2 building with Sergeant Watts?

3 **A.** I don't recall.

4 **Q.** Okay. Do you believe that you did not give
5 his name to the COPA investigators?

6 **A.** Again, I don't recall.

7 **Q.** Okay.

8 MR. TEPFER: Calls for speculation, objection.

9 BY MS. OLIVIER:

10 **Q.** With respect to Gonzalez, is that a name that
11 you gave to the COPA investigation -- COPA investigators
12 as one of the individuals who operated as a part of CPD
13 in the 527 building under Sergeant Watts?

14 **A.** I apologize. Did you say respect to Gonzalez?
15 What -- what did you say?

16 **Q.** I'm -- similar to Young and Nichols, is
17 Gonzalez a name that you gave to the COPA investigators
18 as an individual who was part of Sergeant Watts's team
19 in the 527 building?

20 **A.** I don't recall.

21 **Q.** Okay. As you sit here today, do you know who
22 Gonzalez is?

23 **A.** No. If I see a picture, I probably can point
24 him out.

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1 **Q.** With respect to Nichols, as you sit here
2 today, do you know who that is?

3 **A.** You say respect. I'm -- I'm lost. What do
4 you mean by respect to Nichols?

5 **Q.** Do you know who Nichols is as you sit here
6 today?

7 **A.** Know him as?

8 **Q.** Do you remember who he is?

9 **A.** I would probably have to see the picture.

10 **Q.** Okay. Do you know why you would have given
11 the names of Kenny Young, Nichols, and Gonzalez to the
12 COPA investigators?

13 MR. TEPFER: Objection, mischaracterizes the
14 testimony, calls for speculation, form.

15 But you can answer, if you can.

16 BY THE WITNESS:

17 **A.** I don't recall.

18 BY MS. OLIVIER:

19 **Q.** Lastly, there's the name Coco. Do you know
20 who that is?

21 **A.** What do you mean, do I know who she is?

22 **Q.** You told COPA -- you mentioned an officer
23 named Coco to COPA investigators. Do you remember
24 giving that information to them?

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1 MR. TEPFER: Objection, mischaracterizes the
2 testimony, form.

3 Go ahead.

4 BY THE WITNESS:

5 A. I don't recall.

6 BY MS. OLIVIER:

7 Q. Okay. Do you recall who this person is or
8 could be?

9 A. If I see a picture.

10 Q. All right. So other than the correction to
11 that first statement regarding the fact that you did not
12 know the names of many members, no other corrections to
13 page 9 of the COPA Investigative Report?

14 A. Correct.

15 Q. And this is the last page here, page 10 of the
16 COPA Investigative Report. Did you review this page
17 yesterday?

18 A. No, I did not.

19 Q. Okay. It's short. If you could just look
20 over this last page today and inform us and for the
21 record if there are any inaccuracies, misstatements, or
22 corrections that need to be made.

23 A. Okay.

24 (Short pause.)

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1 BY THE WITNESS:

2 A. There is no corrections to this page. And I
3 apologize. I think I did skim over this page. I did
4 not read it. Like, I think I just looked over it. I
5 was thrown off by seeing the signature. So it's like it
6 was the end of the report.

7 BY MS. OLIVIER:

8 Q. All right. But you've had an opportunity to
9 read these few sentences now?

10 A. Correct.

11 Q. All right. And there are no corrections or
12 things that need to be changed with respect --

13 A. Right.

14 Q. -- to page 10 of this report? Okay. All
15 right.

16 MR. TEPFER: Do you need a break?

17 BY MS. OLIVIER:

18 Q. Aside --

19 MS. OLIVIER: Pardon?

20 MR. TEPFER: I'm just asking the witness if
21 she needs a break. It's been about an hour and a
22 half, but...

23 Do you?

24 MS. OLIVIER: Sure. I actually -- Josh, just

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1 so you know, I was going to just go through a
2 couple of the other documents, potential exhibits I
3 have, just to see if she reviewed them, and then I
4 was thinking maybe we could take a break for lunch
5 after that, if she'd like.

6 MR. TEPFER: That's fine. If you're okay,
7 Clarissa. It's up to you.

8 THE WITNESS: That's fine.

9 BY MS. OLIVIER:

10 Q. Okay. This portion shouldn't take too much
11 longer and then we'll --

12 A. It shouldn't because I did not review any
13 other documents. Just this.

14 Q. Okay. Well, that makes it easy.

15 All right. So did you review what are
16 called answers to interrogatories that you've submitted
17 as part of the discovery of this case prior to appearing
18 today?

19 A. No, I don't remember that.

20 Q. Okay. Do you remember receiving some
21 questions and filling out some legal documents,
22 answering those questions with your attorneys and
23 signing off on them?

24 A. I have signed -- I have seen some legal

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1 documents with my attorney and have signed, I think,
2 maybe a nice amount of documents before.

3 Q. Okay. I'm just going to pull these up and
4 see. So --

5 A. Okay.

6 Q. All right. Can you see my screen?

7 A. Yes.

8 Q. I'm going to be marking this as Exhibit 2.
9 This is Plaintiff Clarissa Glenn's responses to
10 Defendant Watts's interrogatories.

11 (C. Glenn Deposition Exhibit
12 No. 2 marked for identification.)

13 BY MS. OLIVIER:

14 Q. I'm just going to scroll down to the bottom.
15 Is that your signature?

16 A. Correct.

17 Q. Okay. And these interrogatories, is this part
18 of the questions and answers that we've been referencing
19 that you recall filling out with the assistance of your
20 attorneys?

21 A. Yes.

22 Q. Okay.

23 MR. TEPFER: Can I just get the date of that
24 one, just --

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1 MS. OLIVIER: Sure. Hold on.

2 MR. TEPFER: I thought I saw September.

3 MS. OLIVIER: September 7, 2017.

4 MR. TEPFER: Thank you.

5 THE VIDEOGRAPHER: Counsel, I'm losing the
6 witness on the video. Just a little bit.

7 THE WITNESS: Okay.

8 MR. TEPFER: I think, actually, you're getting
9 cut.

10 THE WITNESS: Oh.

11 MR. TEPFER: So it's probably better this way.

12 Is that better?

13 THE VIDEOGRAPHER: Yes. Thank you. I
14 appreciate that. Thank you.

15 THE WITNESS: No problem.

16 (C. Glenn Deposition Exhibit

17 No. 3 marked for identification.)

18 BY MS. OLIVIER:

19 Q. Okay. I'm now -- we can mark as Exhibit 3 --
20 this is Plaintiffs' Ben Baker and Clarissa Glenn's
21 responses to Defendant Officer Brian Bolton's first set
22 of interrogatories, again, part of those questions and
23 answers we've talked about. And is -- this is dated
24 April 20th, 2017.

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1 Is that your signature?

2 **A.** Yes, it is.

3 **Q.** And do you recognize -- or do you -- do you
4 know Ben Baker's signature?

5 **A.** I believe so.

6 **Q.** Okay. Do you recognize that as Ben Baker's
7 signature on this document as well?

8 **A.** I'm assuming it -- it's possible. It could
9 be.

10 **Q.** I don't want you to assume. If you don't
11 know, that's -- that's an okay answer.

12 All right. So you do not know -- you're
13 not quite sure if that's his signature?

14 **A.** No. I'm sure it is -- I know my signature.
15 That's it.

16 **Q.** All right. But your -- okay.

17 **A.** Okay.

18 MS. OLIVIER: Marking this as Exhibit 4.

19 (C. Glenn Deposition Exhibit

20 No. 4 marked for identification.)

21 BY MS. OLIVIER:

22 **Q.** Plaintiff Clarissa Glenn's responses to
23 Defendant Kallatt Mohammed's first set of
24 interrogatories.

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1 Is that your signature there dated
2 August 7th, 2017?

3 **A.** Yes.

4 **Q.** Exhibit 5, Ben Baker and Clarissa Glenn's
5 supplemental responses to Defendant Officer Brian
6 Bolton's first set of interrogatories dated June 22nd,
7 2017.

8 Is that your signature?

9 **A.** Yes.

10 (C. Glenn Deposition Exhibit
11 No. 5 marked for identification.)

12 BY MS. OLIVIER:

13 **Q.** Exhibit 6, Plaintiff Clarissa Glenn's answers
14 to Defendant Alvin Jones's April 14th, 2020,
15 interrogatories.

16 (C. Glenn Deposition Exhibit
17 No. 6 marked for identification.)

18 BY MS. OLIVIER:

19 **Q.** These were just submitted August 11th of 2021,
20 and it looks like -- that's an electronic signature.

21 Do you recall giving that electronic
22 signature on August 11, 2021?

23 **A.** Yes.

24 **Q.** And then -- and then lastly, we'll mark this

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1 as Exhibit 7, plaintiff Clarissa Glenn's responses to
2 Defendant Watts's interrogatories, dated September 7th,
3 2017.

4 Is that your signature?

5 **A.** Right. Yes.

6 MR. TEPFER: Didn't we already mark that as 2?

7 MS. OLIVIER: Oh, shoot. You're right. I'm
8 sorry. I apologize.

9 Withdraw Exhibit 7.

10 BY MS. OLIVIER:

11 **Q.** Did you review an affidavit that -- did you
12 review your affidavit that you submitted as part of your
13 petition for a certificate of innocence before this
14 deposition?

15 **A.** No.

16 (C. Glenn Deposition Exhibit

17 No. 7 marked for identification.)

18 MS. OLIVIER: We'll actually mark this as
19 Exhibit 7, and I won't have you go through it now.
20 But if you could just look over that during our
21 upcoming break. Your attorney has a copy of that.

22 MR. TEPFER: I'm going to object belatedly to
23 the form of the previous question about whether it
24 was prepared for the certificate of innocence.

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1 But go ahead. I know what you're talking
2 about.

3 MS. OLIVIER: Sure. And just so it's clear,
4 I'm referencing the affidavit that's Bates stamped
5 Baker Glenn 22848 through 22851.

6 MR. TEPFER: And did you mark that as
7 Exhibit 7? Is that what you're saying?

8 MS. OLIVIER: Yes. I'm going to mark that as
9 Exhibit 7, and let me see if I...

10 BY MS. OLIVIER:

11 **Q.** Ms. Glenn, do you recognize this document?

12 I'm going to ask you this. Do you
13 recognize your signature on the last page of this
14 document?

15 **A.** Yes, I do.

16 **Q.** Okay. Did you have an opportunity -- or did
17 you review any FBI reports summarizing interviews with
18 you and interviews in your presence --

19 **A.** No.

20 **Q.** -- before today?

21 **A.** No, I did not. I haven't seen any.

22 **Q.** I am not going to mark them as exhibits right
23 now, but I would ask that if you could review during our
24 break, the FBI Bates stamped FBI 000251 through 252, and

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1 actually just that on the break, that would be great to
2 see if you can spot any what you feel are inaccuracies
3 or misstatements and just if you feel that it correctly
4 summarizes your interview with the FBI on
5 September 27th, 2007. Okay?

6 MR. TEPFER: I mean...

7 MS. OLIVIER: In the interest of time, Josh, I
8 think that, you know, rather than having me go
9 through line by line, if she can look at it on her
10 break. It's less than two pages. And then if we
11 can come back and if there are any corrections that
12 need to be made, we can address it right then and
13 there versus having to go through the entire
14 document together.

15 BY THE WITNESS:

16 A. Well, I would like to go through the entire
17 document together personally because we're -- I thought
18 we were taking a break. So when we say taking a break,
19 is that -- am I included in the break? Or do I have to
20 go through the --

21 BY MS. OLIVIER:

22 Q. No, you're --

23 A. I -- I'm just asking.

24 Q. So you are included in the break. I'm just

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1 asking -- this is a less than two-page document. I'm
2 just -- and during this break, I'd just ask you to
3 review it. It shouldn't take you too much time.

4 MR. TEPFER: Okay. We'll -- we'll do that.

5 MS. OLIVIER: Thank you.

6 BY MS. OLIVIER:

7 Q. All right. And so I'm clear, the only
8 document that you reviewed prior to appearing today was
9 the COPA report?

10 A. Correct. Yes.

11 Q. Was anyone present with you when you went over
12 the COPA report?

13 A. No.

14 Q. After you gave your statement to COPA
15 investigators, did you speak with anyone about the
16 substance of that statement that you gave?

17 A. What do you mean?

18 Q. Did you tell anyone about the questions that
19 you were asked and the information that you gave the
20 COPA investigators?

21 A. No. I don't recall that, no.

22 Q. Did you speak with Mr. Baker prior to him
23 appearing for his interview with COPA investigators in
24 December of 2018?

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1 **A.** No.

2 MR. TEPFER: Objection to the form of the
3 question about whether she spoke to him. Go ahead.

4 BY MS. OLIVIER:

5 **Q.** Sure.

6 Did you speak with Mr. Baker about the
7 substance of what he would be telling COPA investigators
8 prior to him meeting with COPA investigators in December
9 of 2018?

10 **A.** No.

11 **Q.** Did you speak with Mr. Baker about the
12 information he gave to COPA investigators and the
13 questions he was asked by COPA investigators after his
14 December 2018 statement?

15 **A.** No.

16 **Q.** Have you spoken with anyone about appearing
17 for this deposition here today besides your attorneys?

18 **A.** I told my son that -- he asked where I was
19 going this morning when I was talking to him, and I told
20 him I had a deposition today.

21 **Q.** Going back to the COPA report, how long did
22 you review it for yesterday?

23 **A.** Less than -- less than an hour. Less than
24 40 minutes.

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1 **Q.** Besides your son and your attorneys, is there
2 anyone else that you can recall speaking with before
3 your deposition today --

4 **A.** No.

5 **Q.** -- about this deposition?

6 **A.** No.

7 **Q.** Was -- besides reviewing the COPA
8 Investigative Report and speaking with your attorneys,
9 was there anything else that you did or looked at or
10 reviewed or Googled in preparation for appearing here
11 today?

12 **A.** No.

13 **Q.** Prior to appearing here today, have you spoken
14 with any of the other plaintiffs in this Watts
15 coordinated pretrial proceedings about this deposition?

16 **A.** No.

17 MS. OLIVIER: All right. I think now is a
18 good time for a break. It's 11:45. Josh, I didn't
19 know if you wanted to take a little bit of a longer
20 break at this point to grab some food or anything
21 like that.

22 MR. TEPFER: I don't think we need to
23 unless -- I mean, yeah, we can do that later, I
24 think.

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1 MS. OLIVIER: Sure. How would you -- how long
2 would you like to take right now? Maybe 10,
3 15 minutes, or less?

4 MR. TEPFER: I think we can probably do it in
5 five to seven.

6 MS. OLIVIER: That works. And if you could
7 just --

8 MR. TEPFER: Okay. I'll go get the report.
9 That's the only thing you're asking her to review,
10 is the FBI report?

11 MS. OLIVIER: And if you could also have her
12 review the affidavit as well.

13 MR. TEPFER: All right.

14 MS. OLIVIER: Thank you.

15 THE VIDEOGRAPHER: We are now going off the
16 record at 11:45 a.m.

17 (Recess.)

18 THE VIDEOGRAPHER: The time is 12 o'clock p.m.
19 We are now back on the record.

20 MR. TEPFER: Can you just tell me what time we
21 went off the record again? I didn't catch it.

22 THE REPORTER: 11:45.

23 MR. TEPFER: Thanks.

24 BY MS. OLIVIER:

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1 Q. Ms. Glenn, what is your full name?

2 A. Clarissa Glenn.

3 Q. Do you have a middle name?

4 A. Clarissa Marie.

5 Q. What is your date of birth?

6 A. 8/30/71.

7 Q. And the last four of your social security
8 number?

9 A. 7890.

10 Q. Did you grow up your whole life in the city of
11 Chicago?

12 A. Yes.

13 Q. And did -- how long did you live with your
14 parents for growing up, until what age?

15 A. Probably like the age of -- between 21 to 23.

16 Q. 20 years old -- anywhere from 20 to age 21 --

17 A. 21 to 23 years old.

18 (Simultaneous crosstalk.)

19 BY MS. OLIVIER:

20 Q. Did your -- was your family home in the same
21 location all the time growing up, or did you move
22 around?

23 A. We were in the same location.

24 Q. What was that address?

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1 **A.** 3831 South Lake Park.

2 **Q.** What neighborhood of Chicago is that?

3 **A.** I'm sorry?

4 **Q.** What neighborhood in Chicago is that home
5 located in?

6 **A.** South side of Chicago.

7 **Q.** Who lived with you at that address growing up?

8 **A.** Mother, father, sister, later on my two
9 brothers.

10 **Q.** What are your parents' names?

11 **A.** Clarence Glenn and Florence Glenn.

12 **Q.** Clarence and Florence?

13 **A.** Yes.

14 **Q.** Your sister's name?

15 **A.** Yvonne Glenn.

16 **Q.** Your brothers' names?

17 **A.** Clarence Glenn, Jr., and Brian Glenn.

18 **Q.** Are your parents still living?

19 **A.** One.

20 **Q.** Which one?

21 **A.** My mother.

22 **Q.** Does she still reside at that same address?

23 **A.** No.

24 **Q.** Where does -- does she still live in Chicago?

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1 **A.** Yes.

2 **Q.** And I'm sorry for your loss. When did your
3 father pass?

4 **A.** 2004.

5 **Q.** And do your siblings still live in the city of
6 Chicago?

7 **A.** One of my brothers do not.

8 **Q.** Which brother does not?

9 **A.** Clarence.

10 **Q.** Do you remember approximately what year he
11 left the city?

12 **A.** No, I do not.

13 **Q.** Have you spoken with your mother or any of
14 your siblings about this lawsuit?

15 **A.** About the lawsuit itself?

16 **Q.** Yes.

17 **A.** No.

18 **Q.** Have you spoken with them about the
19 circumstances underlying the facts of this case, the
20 December 2005 arrest and the other arrest as well?

21 **A.** Can you rephrase your question?

22 **Q.** Sure.

23 Have you spoken with any of your family --
24 your immediately family members about the arrests of

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1 Mr. Baker and yourself from 2000 -- 2004 to 2005?

2 **A.** I spoke about me personally and informed them
3 that Ben was also arrested.

4 **Q.** Besides telling them that you were arrested,
5 what else did you tell them?

6 **A.** What do you mean?

7 **Q.** Well, you know what? Strike that.

8 I'll go into that later.

9 Do you have any relatives that are in law
10 enforcement?

11 **A.** Yes.

12 **Q.** Who?

13 **A.** A cousin.

14 **Q.** What branch of law enforcement is your cousin
15 in.

16 **A.** Cook County sheriff.

17 **Q.** Your cousin's name?

18 **A.** Shannon Bond.

19 **Q.** Did your mother work growing up?

20 **A.** Yes.

21 **Q.** What did she do?

22 **A.** Educator.

23 **Q.** Where did she serve as an educator?

24 **A.** It was a -- it's a preschool. It's Vernon --

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1 I can't recall the name.

2 Q. Fair enough.

3 Was your father employed growing up?

4 A. Growing up?

5 Q. Yes.

6 A. I don't know if he was employed growing up.

7 Q. Do you know of any employment your father
8 held?

9 A. Yes.

10 Q. Okay. What -- what's the employment you know
11 of that your father did?

12 A. Worked at a security firm and also as an
13 officer.

14 Q. What type of officer?

15 A. I believe a Chicago police officer.

16 Q. And is your father's name Clarence Glenn?

17 A. Yes.

18 Q. Do you know when he served as a Chicago police
19 officer?

20 A. No.

21 Q. Do you know how old you were when he was
22 performing this work?

23 A. No.

24 Q. Was the -- was he working at the security firm

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1 at the same time that he was a Chicago police officer?

2 **A.** I -- I'm not for sure.

3 **Q.** Do you know what type of work he did for the
4 security firm?

5 **A.** Mostly like investigation work.

6 **Q.** Do you recall how old you were when he was
7 working for the security firm?

8 **A.** No. I just knew that he was there for a long
9 time, for many years.

10 **Q.** Do you know -- do you know the name?

11 **A.** At the time, it was Security Professionals.

12 **Q.** Was it armed security?

13 **A.** At the time I -- Security Professionals.

14 **Q.** Did your -- do you know if your father
15 possessed any firearms?

16 **A.** Yes.

17 **Q.** How many?

18 **A.** I'm not aware.

19 **Q.** Okay. Do you know if it was related to his
20 work or just his personal preference?

21 **A.** I'm not aware.

22 **Q.** Do you know if he had a license to possess his
23 firearms?

24 **A.** I'm not aware of that, either. I'm sorry.

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1 **Q.** Okay. When he passed, did your family
2 discover any firearms that he owned?

3 **A.** Yes.

4 **Q.** Okay. What were those firearms that your
5 family discovered?

6 **A.** I know it was a rifle. And me speculating, I
7 believe maybe one or two handguns.

8 **Q.** Do you know who -- I don't want to use the
9 word "recovered." Do you know who found those after
10 your father passed?

11 **A.** Well, at first, the rifle, it would sit on the
12 side of the bed in a dresser, but for the handguns, I
13 believe it might have been my mother.

14 **Q.** Do you know the caliber of any of those
15 firearms?

16 **A.** No.

17 **Q.** Or the make or model?

18 **A.** No.

19 **Q.** Do you know where the rifle or those one to
20 two handguns are now?

21 **A.** Not now. I do not.

22 **Q.** Do you -- once your father passed, what
23 happened to those -- to the rifle and the one to two
24 handguns?

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1 **A.** My mother called the -- I don't recall if she
2 called the police station or she called one of my dad's
3 friends who's the owner of -- at the time of Security
4 Professionals to inform them of the guns. And I forgot
5 how they were disposed -- I don't know how they were
6 disposed of. I don't remember that.

7 **Q.** But your mother did not keep them?

8 **A.** No.

9 **Q.** Did your father store any ammunition
10 associated with those firearms?

11 **A.** I don't know if it was associated with those
12 particular firearms, but there was ammunition that was
13 recovered during the cleaning and packing of the house.

14 **Q.** How much ammunition was recovered?

15 **A.** What do you mean?

16 **Q.** How many bullets or cases? What was -- if you
17 can describe what it was.

18 **A.** Like one, two, three, four, five? That's what
19 you're asking?

20 **Q.** Sure.

21 You said that he -- you said that he
22 stored ammunition. So I'm asking you to describe what
23 that was?

24 **A.** No, you asked. I did not say he stored

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1 ammunition. You asked, and I said there was ammunition
2 there in the home. I didn't say he stored ammunition.
3 My -- my understanding with storing is probably
4 different from yours.

5 Q. Okay. So there was ammunition in the home,
6 and I'm wondering, how much ammunition did you find
7 after he passed?

8 A. I don't think it was a lot. I mean -- I
9 believe I -- if I recall, I believe it was a -- a Crown
10 Royal bag, which is a bag that liquor usually is stored
11 in or people can purchase or something. I believe it
12 was ammunitions in there. I don't know what actually
13 happened to that. And then later on, it was a few
14 bullets, I guess in another part of his room, because
15 they weren't in the bag.

16 Q. What happened to the ammunition that was in
17 the Crown Royal bag?

18 A. I -- I only can assume that my mom turned it
19 in with the police department. Something is telling me
20 that the police department -- a police officer came out,
21 but I'm not a hundred percent sure.

22 Q. With respect to the other bullets that were
23 found separate from the Crown Royal bag, what happened
24 to those bullets?

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1 **A.** I had taken some home -- I have taken them
2 home.

3 **Q.** Do you know when this was?

4 **A.** I can't recall.

5 **Q.** Are you currently married?

6 **A.** No, I am not married.

7 **Q.** Have you ever been married?

8 **A.** Yes, I have.

9 **Q.** How many times?

10 **A.** Once.

11 **Q.** To whom?

12 **A.** Ben Baker.

13 **Q.** What year did -- and are you now divorced?

14 **A.** Yes.

15 **Q.** When did you get married?

16 **A.** I believe we were married in 2006.

17 **Q.** When did you divorce?

18 **A.** It was, like -- I believe, like, 2014 or
19 somewhere in that area.

20 **Q.** Do you have any children together?

21 **A.** Yes.

22 **Q.** How many?

23 **A.** We have two biological children together, but
24 in total, we claim -- together as a unit, Ben and

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1 myself, we claim three of our children.

2 Q. Their names?

3 A. Ben Baker, Gerard Baker, and Deon Baker.

4 Q. Which two children are your two biological
5 children between you and Ben?

6 A. Ben Baker and Deon Baker.

7 Q. And Gerard is the biological child of you or
8 Ben?

9 A. Of me, mines.

10 Q. What is the name of his biological father?

11 A. Bernard Harvey.

12 Q. What is Ben Baker, is he a junior?

13 A. Yes.

14 Q. When is Ben Baker, Jr.'s date of birth?

15 A. 7/29/91.

16 Q. Deon's?

17 A. 11/28/93.

18 Q. And is it Gerard or Gerard?

19 A. Gerard.

20 Q. Gerard. Okay.

21 When is his birthday?

22 A. 11/29/92.

23 Q. Do you have any other children besides these
24 three?

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1 **A.** No.

2 **Q.** Does Ben have any other children besides Ben,
3 Deon, and Gerard?

4 **A.** I believe so.

5 **Q.** Do you know the name of that child or now
6 adult?

7 **A.** Shequenia Thayer and Terrence Baker.

8 **Q.** Are either of those individuals your
9 biological children?

10 **A.** No.

11 **Q.** So just Ben's biological children?

12 **A.** Yes.

13 **Q.** Okay. Terrence did not reside with you during
14 his childhood?

15 **A.** No.

16 **Q.** Do you know when he was born?

17 **A.** I don't know the month, but it would be the
18 early part of '92 -- I'm sorry -- '93. I believe '93.

19 **Q.** And with respect to Shequenia Thayer, do you
20 know when she was born?

21 **A.** She's -- I believe she's like 33 in age, so...

22 **Q.** I went to law school so I wouldn't have to do
23 math. So we can deal with that later.

24 Currently, do any -- well, you gave me

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1 your address earlier.

2 Who lives with you at your current
3 address?

4 A. Myself, Ben Baker, Junior and Senior, and Deon
5 Baker.

6 Q. Where does Gerard live?

7 A. With his companion.

8 Q. Is he still in the city of Chicago?

9 A. I'm sorry. Say it one more time.

10 Q. Is he still in the city of Chicago?

11 A. Yes.

12 Q. Does Ben Baker, Sr., have a relationship with
13 either Shequenia or Terrance to your knowledge?

14 A. What type of relationship?

15 Q. You tell me. Does he speak to them? Is there
16 a relationship?

17 A. He -- he do speak to Shequenia, yes.

18 Q. Where does she live?

19 A. I have no -- I don't know.

20 Q. Do you know if she's in the city of Chicago?

21 A. No, I do not know.

22 Q. Do you know where Terrance Baker resides?

23 A. I believe in Minnesota.

24 Q. Have you spoken with either Shequenia or

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1 Terrance about this lawsuit or the facts underlying the
2 lawsuit?

3 A. No, I have not.

4 Q. Do you know if Ben has?

5 A. No, I do not.

6 Q. Do you know Ben's date of birth, Ben, Sr.? If
7 I call him Ben, will you understand who I'm talking
8 about?

9 A. I can -- it depends on your questions.

10 Q. Okay. How about this? Just to make it simple
11 going forward, if I'm referring to Ben Baker, Jr. I'll
12 say Ben Baker, Jr. But, otherwise, if I'm referring to
13 Ben or Ben Baker, I'll be referring to your ex-husband.
14 Okay?

15 A. Okay.

16 Q. All right. Do you know Ben's date of birth?

17 A. 5/24/72.

18 Q. How would you describe your relationship with
19 Ben today?

20 A. Fine.

21 Q. Are -- he's obviously living with you. Do you
22 have any plans to reconcile or remarry?

23 A. Unsure.

24 MR. TEPFER: Objection to the form of the

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1 question.

2 Go ahead.

3 BY MS. OLIVIER:

4 Q. Do you know Ben's parents' names?

5 A. His mother, yes.

6 Q. What is his mother's name?

7 A. Yvonne Baker.

8 Q. Is she still living?

9 A. Yes.

10 Q. Do you know her birthday?

11 A. No. I -- I just know it's in March. But, no,
12 I do not.

13 Q. Do you know where she resides?

14 A. Some little suburb area.

15 Q. Suburb of Chicago?

16 A. Yes.

17 Q. Does -- to your knowledge, does Ben still
18 speak with his mother?

19 A. I would assume so.

20 Q. Okay. Do you know the last time he spoke with
21 her?

22 A. I would not have that information, no.

23 Q. Do you have your own separate relationship
24 with Mrs. Baker?

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1 **A.** Like what do -- I don't understand.

2 **Q.** Well, as your mother-in-law, do you -- are you
3 close? Do you speak with her often?

4 **A.** I speak with her, yes.

5 **Q.** When was the last time you spoke with her?

6 **A.** Yesterday.

7 **Q.** Did you speak with her about this deposition?

8 **A.** No.

9 **Q.** Have you spoken with her about this lawsuit?

10 **A.** No.

11 **Q.** Did you ever speak with her about the December
12 2011 -- 2005 arrest?

13 **A.** I don't recall.

14 **Q.** Does Ben have any siblings?

15 **A.** Yes.

16 **Q.** How many?

17 **A.** Two.

18 **Q.** Do you know their names?

19 **A.** Yes.

20 **Q.** What are they?

21 **A.** Geraldine Baker Harris and Gail Miller
22 Anderson.

23 **Q.** Do they live in Chicago?

24 **A.** Gail, yes, and I -- and Geraldine lives in a

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1 suburb.

2 Q. A suburb of Chicago?

3 A. Yes.

4 Q. Now, you mentioned that you lived in your
5 family home up until some point when you were age 20 or
6 23. So if you were born in 1972, you would have left
7 your family home sometime between '83 and '86. Does
8 that sound right?

9 A. No. And I was born in '71, not '72.

10 Q. I'm sorry.

11 A. Huh-uh. That's fine.

12 I was still living with my parents in '91.

13 Q. Again, my math is terrible. So I'm --

14 A. It's fine. And I'm -- I'm trying to recall
15 also because my first time -- I remember being with my
16 parents in '91. So in '92 or '93, I did have an
17 apartment, but I mostly still stayed with my parents.

18 Q. Okay. And you would have been 23 -- and I'm
19 sorry -- in 1995. So I was very off.

20 So would you have moved out in the -- does
21 1995 sound accurate when you would have first moved out
22 officially?

23 A. It's probably a little before that. It's
24 probably before that. But okay. We can say that.

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1 **Q.** When you first moved out, who were you living
2 with?

3 **A.** Me and my three boys.

4 THE VIDEOGRAPHER: Excuse me, Counsel.
5 Sorry to -- take the laptop screen and just bring
6 it down just a little bit because as she looks at
7 documents -- yeah, there we go. Thank you. I
8 appreciate it.

9 MR. TEPFER: Thank you.

10 BY MS. OLIVIER:

11 **Q.** Do you recall the address of the apartment
12 that you were living at when you first moved out of your
13 family home?

14 **A.** My first apartment was on 62nd and Calumet.
15 It was Apartment 1102 or 1106.

16 **Q.** How long did you stay at that address for?

17 **A.** I had the apartment probably for, like, a
18 year.

19 **Q.** And why did you leave at the end of that year?

20 **A.** To be closer to my parents' home.

21 **Q.** Did you move into another apartment, or did
22 you move back in with your parents?

23 **A.** I moved into another apartment.

24 **Q.** Okay. Do you know what the address of that

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1 apartment was or where it was located?

2 **A.** That was the 527 East Browning apartment,
3 Apartment 206.

4 **Q.** Do you know the year that you moved into that
5 apartment?

6 **A.** Not -- not -- no, I do not.

7 **Q.** Does 1997 sound -- around that, sound
8 accurate?

9 **A.** Yes. Probably. Yes.

10 **Q.** Now, you already stated Ben was not living
11 with you at the 62nd and Calumet apartment.

12 When you moved to 527 East Browning, was
13 Ben living with you then?

14 **A.** Not at the beginning, no.

15 **Q.** Why -- why was he not living with you when you
16 were living at the 62nd and Calumet apartment?

17 **A.** Ben was in- -- incarcerated.

18 **Q.** And then why did he not initially move in with
19 you to the 527 East Browning apartment?

20 **A.** At the beginning, he was also still
21 incarcerated.

22 **Q.** Now, 527 East Browning was part of the
23 Ida B. Wells Extension Homes; is that correct?

24 **A.** Yes.

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1 **Q.** How did it come to be that you chose that
2 location besides it being close to your parents?

3 **A.** My dad actually helped me get into that
4 low-income housing unit because it was closer to -- to
5 home.

6 **Q.** Did you receive any federal assistance or any
7 local Chicago voucher or any sort of assistance in order
8 to get into that apartment?

9 **A.** No.

10 **Q.** Okay. What did your dad do to assist you in
11 getting into 527 East Browning?

12 **A.** I do not recall.

13 **Q.** When did you -- it's my understanding that you
14 first met Ben when you were both attending Deacon
15 Technical College in around 1989. Does that sound
16 accurate?

17 **A.** What -- what college?

18 **Q.** Deacon Technical College, but it was a night
19 school?

20 **A.** No. That's incorrect.

21 **Q.** Okay. What -- where did you first meet Ben?

22 **A.** At Dawson -- at Dawson Technical Institute.
23 It's also a night school.

24 **Q.** Dawson. Okay. That could have been a typo on

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1 my part.

2 Dawson Technical Institute?

3 A. Yes.

4 Q. Was that in 1989 or a different year?

5 A. That sounds about right. In '89.

6 Q. Was the relationship between you two instantly
7 romantic, or were you friends first?

8 A. What -- what do you mean, "instantly
9 romantic"? I don't understand.

10 Q. Sure.

11 When you first met him, what -- how was
12 your interactions with each other?

13 A. He was in class. I came in late. He was
14 sitting behind me, and I needed to take some notes, and
15 I asked, can I -- -- did he take the notes, or something
16 to that aspect. And he said yes. I asked, can I jot
17 them down? And he allowed me to see his notations of
18 the class.

19 Q. Obviously, at some point, you and Ben entered
20 into a committed relationship with one another; is that
21 true?

22 A. Yes.

23 Q. When did that occur?

24 A. That -- probably that same year.

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1 Q. 1989?

2 A. Yes.

3 Q. Now, did he already have a child at that
4 point?

5 A. Knowing now -- not today, but knowing now,
6 yes. But I was not aware at that time.

7 Q. When did you become aware that he had another
8 child, Shequenia?

9 A. I can't recall that.

10 Q. Was it after you had had your children
11 together?

12 A. No. It was before. Before.

13 Q. And your youngest was born in 1991?

14 A. My oldest?

15 Q. Sorry. Your oldest.

16 A. Yeah. I -- I didn't hear. I'm turning my
17 head. I know someone made a comment, I believe, that I
18 was reviewing documents. I'm turning my head so that I
19 can hear and make sure I'm understanding clearly. So
20 I'm going to have to keep asking someone to repeat their
21 question. So I just wanted to make that clear on
22 record.

23 Q. Sure. No. This is just me being terrible at
24 math again.

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1 **A.** No, it was not you. It was someone else. But
2 that's fine.

3 **Q.** All right. So your oldest child was born in
4 1991. So sometime between 1989 and 1991, you discovered
5 that Ben had another child?

6 **A.** Yes.

7 **Q.** Was that difficult for you two to navigate?

8 MR. TEPFER: Objection to form.

9 Go ahead. You can answer it.

10 BY THE WITNESS:

11 **A.** Navigate what?

12 BY MS. OLIVIER:

13 **Q.** The fact that he had a child with another
14 woman but was committed to you?

15 **A.** I don't understand your question.

16 **Q.** How did you feel when you found out that he
17 had another child?

18 **A.** That he had a child? Because we didn't have a
19 child together. It was...

20 **Q.** Sure.

21 **A.** Okay.

22 **Q.** Was he involved in Shequenia's life at that
23 time?

24 **A.** I -- I don't believe -- I'm not for sure.

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1 **Q.** Do you know if he was paying child support for
2 her?

3 **A.** No, I -- no.

4 **Q.** No, you do not know, or no, he was not?

5 **A.** No, I do not know. Me assuming, he was not.

6 **Q.** Now, did you have any periods of time where --
7 you obviously started a committed relationship in around
8 1989. You said shortly after you met. Or would that
9 have been shortly after you met that you became
10 committed to each other?

11 **A.** Yes. I would say yes.

12 **Q.** Were there periods of time that you broke up
13 after 1989?

14 **A.** From '89 to current or -- I don't --

15 **Q.** Let's say from '89 to '99, those ten years.

16 **A.** I would say, for me, yes.

17 **Q.** I'm just looking at the birth dates, and it
18 looks like Gerard was born in 1992.

19 Was that a time period when you were not
20 together?

21 **A.** Yes.

22 **Q.** Did Gerard's dad have the nickname Bird?

23 **A.** No.

24 **Q.** Okay. Was Gerard's dad in a gang?

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1 **A.** I'm not for sure.

2 **Q.** Did he ever reside in any of the Ida B. Wells
3 buildings?

4 **A.** When I met him, he was not.

5 **Q.** After meeting -- maybe -- I understand maybe
6 initially when you first met him. But later as time
7 went on and you were living in the Ida B. Wells Homes,
8 did you ever learn that he was living there as well?

9 **A.** No.

10 **Q.** Okay. When did you and Ben first live
11 together?

12 **A.** Maybe, like, the -- I'm really focusing on
13 '92, but maybe the end of '91 sometime, but...

14 I will say for sure in '92, I believe.

15 **Q.** Do you know how old you and Ben were when you
16 first met?

17 **A.** 18. I was 18. And Ben lied about his age,
18 but at the time he was 17.

19 **Q.** Are you aware that he joined the Gangster
20 Disciples sometime at around age 17 or 18?

21 **A.** No, I was not.

22 MR. TEPFER: Objection to the form of the
23 question.

24 BY MS. OLIVIER:

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1 **Q.** Are you aware today that he was a member of
2 the Gangster Disciples at around age 17, 18?

3 **A.** No.

4 MR. TEPFER: Objection to the form of the
5 question.

6 Go ahead. You can answer.

7 BY MS. OLIVIER:

8 **Q.** Do you know --

9 MR. TEPFER: Can you answer for the record?

10 BY THE WITNESS:

11 **A.** Oh. No, I was not aware.

12 BY MS. OLIVIER:

13 **Q.** Do you know if Ben was ever a member of a
14 gang?

15 **A.** I mean, he never told me that he was a member
16 of a gang, if that's what you're asking. He never told
17 me that he was.

18 **Q.** Okay. So he never had any discussions with
19 you about joining the Gangster Disciples?

20 **A.** Correct.

21 **Q.** He never consulted you on that?

22 **A.** No.

23 **Q.** Okay. Were -- did you ever see -- well,
24 strike that.

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1 Did -- were you aware of -- well, did Ben
2 have friends when you were dating each other or
3 committed to each other?

4 **A.** Yes.

5 **Q.** To your knowledge, were any of his friends
6 members of gangs?

7 **A.** No. I don't -- no.

8 **Q.** Were -- when you first met Ben, were you aware
9 of any interactions he'd had with law enforcement?

10 **A.** No, I did not, or do not have any knowledge of
11 that.

12 Well, he did -- I -- I apologize. He
13 didn't actually tell me. He was having a conversation.
14 And I know a police officer slapped him, he said. But I
15 think it was a -- it was -- it was a group of guys was
16 being held. I don't know if it was for questioning or
17 what. But he mentioned that he had gotten slapped, but
18 it was in a conversation. It wasn't to me. I was just
19 there.

20 **Q.** When was this conversation in the span of your
21 relationship?

22 **A.** Before I had kids. Before we had kids.

23 **Q.** So sometime between 1989 and 1991?

24 **A.** I would probably say maybe '90 and '91.

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1 **Q.** Were you aware that Ben was serving two
2 sentences of probation in '90 and '91?

3 **A.** No, I was not until later.

4 **Q.** When did you --

5 **A.** You said two. I'm sorry. You said two?

6 **Q.** Yes.

7 **A.** No. I -- later I found out that it was one.
8 I didn't know it was two.

9 **Q.** Were you aware that it was related to two
10 different charges?

11 **A.** No.

12 **Q.** Okay. When did you find out that he was on
13 probation?

14 **A.** After our first child. We were just
15 reminiscing, and we were talking about school or
16 something. I don't recall the whole conversation. And
17 he -- I asked him, why did he stop coming? And he said
18 his probation was over or whatever that thing was.
19 Probation or whatever was over. And that's how I
20 learned that he was on probation.

21 **Q.** Now, at this point, when your first child was
22 born in '91, were you still living with your parents at
23 that time?

24 **A.** Yes.

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1 **Q.** Did Ben ever reside with you at your family
2 home?

3 **A.** No.

4 **Q.** You obviously already -- and so Gerard was
5 born in November of 1992. Was Ben immediately a part of
6 his life when he was born?

7 **A.** Yes.

8 **Q.** So what was the time period that you would say
9 that you two were not together between Ben Baker, Jr.s',
10 birth and Gerard's birth?

11 **A.** I can't recall.

12 **Q.** Was the reason that you were broken up, did it
13 have anything to do with him concealing the fact that he
14 had these criminal felony charges or felony convictions?

15 MR. TEPFER: Objection to the form of the
16 question.

17 Go ahead.

18 BY THE WITNESS:

19 **A.** No.

20 BY MS. OLIVIER:

21 **Q.** Did -- when you -- when Ben told you that --
22 or brought up the conversation after Ben Baker, Jr., was
23 born that he was on probation or his probation was
24 ending, how did you take that information?

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1 **A.** Well, he said that it has ended. So when we
2 had that conversation, it was over, from my
3 understanding, recollection. And, like, did I go crazy
4 and shoot him, I -- I don't know. Fine. I -- I was
5 fine.

6 **Q.** Did you ask him what he was on probation for?

7 **A.** No.

8 **Q.** Why not?

9 **A.** It wasn't a concern. I had a newborn. So it
10 wasn't my concern.

11 **Q.** Now, Ben was arrested in October of 1993,
12 correct?

13 **A.** I don't recall that. You have to refresh
14 my...

15 **Q.** Sure.

16 Well, your son Deon was born
17 November 28th, 1993?

18 **A.** Yes.

19 **Q.** When he was born, Ben was not there, correct?

20 **A.** Correct.

21 **Q.** And what was the reason he wasn't there?

22 **A.** When Deon was born?

23 **Q.** Yes.

24 **A.** Ben was in the Cook County Jail criminal

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1 division system.

2 Q. What was your understanding of why he was
3 there?

4 A. I believe it was that attempted murder. That
5 was the attempted murder case.

6 Q. He does have an attempted murder case from
7 that time.

8 Were you aware that there were other
9 charges as well?

10 A. So with that, if I would assume it was
11 attempted murder, then I would assume maybe a handgun
12 was involved, also. Would that be another charge?

13 Q. That's true. That was another -- there were
14 two separate felony cases that he had.

15 A. Okay.

16 Q. Did you under- -- was that your understanding
17 of what he was facing at the time?

18 A. I -- I recall the attempted murder as far as
19 the gun, yeah.

20 Q. How did you learn that he was arrested for
21 attempted murder?

22 A. He called me.

23 Q. From jail?

24 A. Yes.

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1 Q. What -- what did he say in that conversation?

2 A. It was late. That he's been arrested and he
3 go to court whatever day. I think he had a court day or
4 something, or he was going to appear in front of a judge
5 the next day or two day -- I don't know. He was going
6 to appear in front of the judge. And then that's when
7 he would find out, like, the charges.

8 Q. Did he tell you that he was -- that he had
9 shot someone?

10 A. No.

11 Q. Did he tell you that he had been possessing a
12 gun?

13 A. No.

14 Q. Prior to this point, were you aware that he
15 was a convicted felon?

16 A. Before his -- before that attempted murder
17 case?

18 Q. Yes. Yes.

19 A. No. So the probation -- I don't know. So the
20 probation, is that part of a -- I'm not a lawyer. Is
21 that part of a conviction felon if receive probation?

22 Q. So it was a felony conviction. So I'm just
23 wondering if you knew that information when you received
24 this phone call in October of 1993.

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1 **A.** Okay.

2 **Q.** Did you -- did you know that in October of
3 1993?

4 **A.** No.

5 **Q.** Once you received that phone call -- you're
6 obviously very pregnant -- how did you take it?

7 MR. TEPFER: Objection to the form of the
8 question.

9 BY THE WITNESS:

10 **A.** I assume, like, maybe scared maybe.

11 BY MS. OLIVIER:

12 **Q.** Were you upset with him?

13 **A.** No.

14 **Q.** Do you know if those charges or that shooting
15 was gang related?

16 **A.** No.

17 **Q.** Did Ben ever explain to you the circumstances
18 of what took place?

19 **A.** No.

20 **Q.** Did you ever ask?

21 **A.** No. The only thing that I know, that his car
22 broke down or something, and some police officers helped
23 him with the -- with his car or his cousin car, because
24 it was him and his cousin together. And then he was

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1 arrested. So the police that was there helping arrested
2 him and his cousin or just him. But no.

3 Q. Do you know who he shot and attempted to kill?

4 A. No.

5 Q. Did you ever ask?

6 A. No.

7 Q. Did it ever concern you that the father of
8 your children had been arrested and charged with these
9 crimes?

10 MR. TEPFER: Objection to the form of the
11 question.

12 Go ahead.

13 BY THE WITNESS:

14 A. No.

15 BY MS. OLIVIER:

16 Q. Why not?

17 A. Because I didn't know the situation and the
18 circumstances.

19 Q. Is there a reason why you never asked him what
20 the situation and circumstances were?

21 A. No. It was just a conversation that was never
22 brought up or never spoke about.

23 Q. When he was sentenced, do you recall what his
24 sentence was related -- excuse me -- related to the

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1 attempt murder and the unlawful use of a weapon by a
2 felon?

3 **A.** I think he had to do under five years, I
4 think. Three -- three or five years. I -- I forgot.
5 It's -- I forgot.

6 **Q.** Were you present for any of his court
7 hearings?

8 **A.** Yes.

9 **Q.** Did you attend his bond hearing for those
10 cases?

11 **A.** Yes.

12 **Q.** And what do you remember about that?

13 **A.** I don't -- for that, I don't believe that he
14 was able to get bond. I don't know if it was because of
15 the case, the severity of the case, or if he was on
16 probation or something. I -- I don't believe he was --
17 he wasn't able to get bond, I don't think.

18 **Q.** Do you recall the attorney that represented
19 him for those cases?

20 **A.** Hal Garfinkel.

21 **Q.** Was that a private attorney or a public
22 defender?

23 **A.** A private attorney.

24 **Q.** Going back a little bit --

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1 MR. TEPFER: Correct --

2 BY THE WITNESS:

3 A. Excuse me.

4 He did -- when I thought of the lawyer, he
5 did get bonded out on that case, on that attempted
6 murder case, because it was going to trial. But I know
7 it was just, like, prolonging, and then I remember
8 seeing Ben and myself going to court and meeting Hal at
9 the court in a courtroom or outside the courtroom. So
10 he did get bonded out.

11 BY MS. OLIVIER:

12 Q. So you and Ben obviously were both attending
13 Dawson Technical Institute as teenagers.

14 Was it a GED program or a high school
15 diploma situation?

16 A. For me at the time, it was going to be a high
17 school diploma, to get more credits.

18 Q. Did you ultimately receive a diploma or GED
19 from the program?

20 A. Not from that program, no, ma'am. Later.

21 Q. Okay. When did you stop attending Dawson?

22 A. I believe it was in 1990 sometime.

23 Q. Were you employed after that?

24 A. I believe that I was employed at a

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1 convenience -- yes.

2 Q. That was going to be my next question. Where
3 were you employed at? A convenience store?

4 A. Yes.

5 Q. How long did Ben attend Dawson for?

6 A. I'm not sure.

7 Q. Did he stop attending in 1990 at -- around the
8 same time as you?

9 A. I know -- the only thing I remember is him
10 leaving before me.

11 Q. Okay. So you left in 1990. He left before
12 you?

13 A. Yes.

14 Q. Where was he living during the time that you
15 were both -- that you met and attending Dawson?

16 A. I think he was house to house with relatives.
17 I don't think he had a stable home.

18 Q. Did -- after Ben stopped attending Dawson,
19 what was he doing for employment, if anything?

20 A. I don't recall any employment.

21 Q. Between him concluding his attendance at
22 Dawson until his October of 1993 arrest, did he ever
23 hold a job?

24 A. No, I don't -- no.

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1 **Q.** Do you know if he was drug dealing during this
2 time?

3 **A.** No, I do not know.

4 **Q.** Again, at any point during this time of 1990,
5 1993, were you made aware that he was a member of the
6 Gangster Disciples?

7 **A.** That's the same question you asked earlier.

8 **Q.** You still have to answer my questions. If
9 your attorney instructs you --

10 **A.** I apologize. I was like it sounds familiar.
11 But --

12 MR. TEPFER: Asked and answered.

13 She's coaching me. But you have to
14 answer.

15 BY THE WITNESS:

16 **A.** Can you repeat your question?

17 BY MS. OLIVIER:

18 **Q.** Sure.

19 From 1990 to 1993, it's your testimony you
20 weren't aware that he was a member of the Gangster
21 Disciples?

22 **A.** Correct.

23 **Q.** Okay. How were you both surviving without --
24 with you working at a convenience store and him not

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1 having employment?

2 **A.** How was both of us surviving, or how was I
3 surviving?

4 **Q.** Well, I'll start with you. How were you
5 surviving?

6 **A.** Family and working. But mostly family.

7 **Q.** How was Ben surviving?

8 **A.** I never -- we never discussed that.

9 **Q.** During this time period from when Ben was born
10 in July of 1991 -- Ben Baker, Jr., was born in July of
11 1991 up until Ben, Sr.'s arrest in October of 1993, did
12 he ever contribute to household expenses for you and
13 Ben, Jr., and Gerard?

14 **A.** I didn't need him to help with household
15 expenses. My parents took care of light bills and --
16 no.

17 **Q.** Did that bother your parents at all, that they
18 were taking care of you and Ben was not?

19 **MR. TEPFER:** Objection to the form of the
20 question.

21 You can answer, if you understand the
22 question.

23 **BY THE WITNESS:**

24 **A.** Could you repeat that for me?

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1 BY MS. OLIVIER:

2 Q. Sure. And I'll word it a bit differently.

3 Did that ever bother your parents that
4 they were taking care of you financially but the father
5 of your children was not?

6 MR. TEPFER: Objection to form again.

7 Go ahead.

8 Calls for speculation.

9 BY THE WITNESS:

10 A. I think that's the same question that you
11 asked. But what do you mean by my parents taking care
12 of me? I lived under their roof. We ate together as a
13 family. I guess because my mom would go grocery
14 shopping, I guess she wouldn't deny anyone to eat
15 because she fed my dad, family members, and so I -- I
16 don't understand that question.

17 BY MS. OLIVIER:

18 Q. So I guess the -- a simpler way is it didn't
19 bother your parents that Ben wasn't assisting with food
20 for you, the children, diapers, clothing, any of those
21 things?

22 MR. TEPFER: Objection to form, speculation.

23 Go ahead.

24 BY THE WITNESS:

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1 **A.** My parents took care of their household, which
2 is their house. I had my space, and I was working. As
3 far as me taking care of the boys, I took good care of
4 them. And if I needed some assistance or if they needed
5 anything, I just had to ask. I really didn't have to
6 ask because my family is just supportive and -- and
7 loving. Like, they -- they're very caring and giving
8 people. So we didn't ask for things. It just happened.

9 BY MS. OLIVIER:

10 **Q.** I completely understand, and I hear that. I'm
11 just wondering if it bothered them that Ben was not
12 involved in those aspects of you and your children's
13 lives.

14 MR. TEPFER: Object, asked and answered two
15 other times.

16 BY THE WITNESS:

17 **A.** Well, when you say Ben wasn't involved in
18 their life, I -- I'm -- I'm confused on that. Because
19 if you mean like, did Ben change a diaper or gave them a
20 bath, yes, or if he picked them up and spent time with
21 them one-on-one, yes. So I don't know what you mean as
22 far as -- and I never asked my parents how they felt.
23 But the door was open for him to come and see the boys
24 and to come and sit in the family room and -- yeah. He

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1 was invited to eat if we cooked or...

2 BY MS. OLIVIER:

3 Q. Was there any indication that it ever bothered
4 your family that he did not have a job?

5 A. Me and my family never discussed that, if it
6 bothered them or not.

7 Q. Did it bother you as you were working with --
8 as, you know, a mom raising two kids in your parents'
9 home?

10 MR. TEPFER: Objection, argumentative, form.
11 Go ahead.

12 BY THE WITNESS:

13 A. No. Because it was a -- the family was a
14 support team, so I -- I never had, you know, an issue
15 financially or with my -- my kids.

16 BY MS. OLIVIER:

17 Q. So once Ben was arrested, obviously, he was
18 out of the picture physically to be a part of your and
19 your children's lives, correct?

20 A. Yes.

21 Q. Did you ever visit him in prison?

22 A. Yes.

23 Q. How often would you visit him in prison?

24 MR. TEPFER: Objection to foundation. What

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1 period are you talking about?

2 MS. OLIVIER: Sure. Thank you, Josh.

3 BY MS. OLIVIER:

4 Q. After Ben was sentenced on his U UW, unlawful
5 use of a weapon by a felon charge and -- excuse me --
6 conviction, and attempt murder conviction, did you visit
7 him in prison after he was sentenced on those two cases?

8 A. So the -- and this is a question. So the U UW
9 and the attempt murder, that's the same case, right?
10 Are you --

11 Q. I believe they're different case numbers, but
12 they were both --

13 A. The same --

14 Q. He was arrested -- yes.

15 A. You say how often did I visit?

16 MR. TEPFER: In prison.

17 BY THE WITNESS:

18 A. In prison? I think maybe like once a month.

19 BY MS. OLIVIER:

20 Q. Where was he imprisoned at, which correctional
21 facility, if you recall?

22 A. I don't recall.

23 Q. Do you remember when he got out?

24 A. No, I don't recall.

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1 **Q.** During -- well, once he was arrested in 1993,
2 and, obviously, he was sentenced on those cases, did you
3 continue working at the convenience store, or did you
4 hold other jobs during that time period to support
5 yourself and your kids -- your kids?

6 **A.** I had left the convenience store and had
7 another job. I had another job during that time.

8 **Q.** Do you recall where that job was?

9 **A.** I was working for a Help at Home agency.

10 **Q.** In your answers to interrogatories, it
11 indicates that you worked for that company starting in
12 1998. Does that -- is that an incorrect start time?

13 **A.** I'm trying to think. Because I also -- I -- I
14 don't remember. I apologize.

15 **Q.** Okay. Do you remember any other jobs between
16 working at the convenience store and beginning to work
17 at Help at Home?

18 **A.** Yeah. It was the convenience store. Help at
19 Home. A se- -- the security company, Security
20 Professionals.

21 **Q.** We're getting a little bit ahead because I --
22 I just want to focus on this time period of when Ben was
23 incarcerated.

24 So his Illinois Department of Corrections

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1 records indicate that he was released from prison on
2 those 1993 charges on July 10th, 1997. Does that ring
3 true to you?

4 **A.** You said that's what the prison record states?

5 **Q.** Yes.

6 **A.** I will go by that.

7 **Q.** Okay. At that point, when he was released,
8 had you already moved to 527 East Browning, Apartment
9 206?

10 **A.** Yes.

11 **Q.** Did you -- during that time, were you
12 continuing to see him once a month in prison?

13 **MR. TEPFER:** Objection to foundation.

14 **BY THE WITNESS:**

15 **A.** What did -- what was your question?

16 **BY MS. OLIVIER:**

17 **Q.** From 1993 to 1997, were you continuing to
18 visit Ben once a month in prison?

19 **A.** I don't remember.

20 **Q.** Okay. Were you speaking with Ben regularly
21 during 1993 to 1997?

22 **A.** What's regularly? I mean, I think that
23 sometime in prison -- what is regularly? What do you
24 mean?

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1 Q. You tell me. If --

2 A. You tell me. I don't know.

3 Q. Do you know how often you spoke with Ben
4 during the time period of 1993 to 1997?

5 A. No.

6 Q. Were you speaking with him?

7 A. Yes.

8 Q. Were -- was it via telephone or letters?

9 A. Both.

10 Q. Did you keep any of those letters from 1993 to
11 1997?

12 A. No.

13 Q. When Ben was released from prison, did he come
14 to live with you and the boys?

15 A. Yes.

16 Q. Was he a part of your decision to move to the
17 Ida B. Wells Homes?

18 A. No.

19 Q. What -- how long after he was released from
20 prison did he come live with you?

21 A. Right after, the same day he was -- I believe
22 it was the same day that he was released.

23 Q. Were you aware that he previously lived in the
24 Ida B. Wells Homes at that time?

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1 **A.** Yes.

2 **Q.** And how did he talk about that experience
3 living there?

4 MR. TEPFER: Objection to the form of the
5 question.

6 BY THE WITNESS:

7 **A.** He did not.

8 MR. TEPFER: Just let me finish the objections
9 before you -- you're fine. Go ahead.

10 BY MS. OLIVIER:

11 **Q.** Did he -- the Ida B. Wells Homes were public
12 housing, correct?

13 **A.** Yes.

14 **Q.** How would you describe the upkeep of the
15 buildings when you moved in in 1997 with the boys?

16 **A.** Very nice.

17 **Q.** 527 specifically was very nice?

18 **A.** I believe that the whole -- MLP and the whole
19 area was very nice.

20 **Q.** In what way was it nice?

21 **A.** Clean. Lack of trash. No one hanging out.
22 The corridors were clean. It seemed like it was quiet.

23 **Q.** Did the 527 building have -- any other
24 buildings to your knowledge have janitorial staff?

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1 **A.** Was -- was there janitors working for -- on
2 the premises?

3 **Q.** Did the -- I asked -- you can answer any
4 question. If you don't understand it, I can rephrase
5 it.

6 **A.** Okay. Can you rephrase it?

7 **Q.** Sure.

8 Was there janitorial staff assigned to the
9 527 building?

10 **A.** I'm not aware of that.

11 **Q.** Did you ever see individuals cleaning the
12 527 building?

13 **A.** Yes.

14 **Q.** Ben never talked to you about his experiences
15 growing up in Ida B. Wells?

16 **A.** No.

17 **Q.** Did you know anyone else living in
18 Ida B. Wells when you first moved in with the boys?

19 **A.** No.

20 **Q.** Esthetically, how did 527 appear?

21 **A.** Can you rephrase that?

22 **Q.** Sure.

23 I think you said it was clean. It had a
24 lack of trash. Were there bars on the windows?

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1 **A.** I did -- yes, it was -- I believe they called
2 safe- -- child safety bars, yes.

3 **Q.** Were these child safety bars on every
4 apartment's exterior windows?

5 **A.** Yes.

6 **Q.** Were there extra security doors on the face of
7 the apartments?

8 **A.** What do you mean?

9 **Q.** Well, what did the doors look like? What did
10 the door look like to your apartment, 206?

11 **A.** A door.

12 **Q.** Was there anything else on the exterior of the
13 door, or was it just a standard wooden door?

14 **A.** Oh, we had -- there was some bars there.

15 **Q.** What was your --

16 **A.** A gate.

17 **Q.** What was your understanding of the reasoning
18 for having bars and a gate on the exterior of your
19 wooden door?

20 MR. TEPFER: Objection to form.

21 But go ahead.

22 BY THE WITNESS:

23 **A.** I'm not for sure. When I was shown the
24 apartment, the janitors, I think they just got done

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1 cleaning the apartment or something. I don't know. I
2 didn't have -- I never asked.

3 BY MS. OLIVIER:

4 Q. Did you live in Apartment 206 with just you
5 and the boys before Ben arrived?

6 A. Yes.

7 Q. Did you ever feel unsafe there?

8 A. No.

9 Q. Did you ever observe -- when you first moved
10 in in 1997 with your three boys, did you ever observe
11 any drug sales going on?

12 A. No.

13 Q. Did you ever -- well, there were elevators in
14 these -- in the 527 building, correct?

15 A. Yes.

16 Q. Were there also stairwells as well?

17 A. Yes.

18 Q. Did you ever observe any drug deals taking
19 place on the stairwells?

20 A. During what time?

21 Q. When you first moved in, 1997.

22 A. No.

23 Q. I know you had said earlier that your father
24 had assisted you with securing the Apartment 206.

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1 Did you have to yourself fill out any
2 applications or undergo any sort of vetting process in
3 order to attain that apartment?

4 **A.** I remember filling out an application --

5 **Q.** Did you --

6 **A.** Vaguely remember.

7 **Q.** Did you have to show proof of income?

8 **A.** I don't remember that. I -- I believe I did
9 or a question was asked about the income.

10 **Q.** Do you know if you were living there under
11 Section 8 housing?

12 **A.** I was not.

13 **Q.** Okay. Do you know what your income was at
14 that time?

15 **A.** I know it was under 30,000 a year. I know it
16 was under that.

17 **Q.** Were you aware of the gang activity taking
18 place in the Ida B. Wells Homes in 1997?

19 MR. TEPFER: Objection to the form of the
20 question.

21 Go ahead.

22 BY THE WITNESS:

23 **A.** No.

24 BY MS. OLIVIER:

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1 **Q.** At any point in time -- well, let me ask you
2 this.

3 When did you -- how long did you live at
4 527 East Browning in Apartment 206?

5 **A.** From sometime in '97 all the way up to my
6 conviction.

7 **Q.** I saw somewhere that you left in June of 2006.
8 Is that not accurate?

9 **A.** My -- I left during my conviction. At the --
10 when I got convicted and sentenced. Well, let me
11 rephrase it. When I got sentenced, that's when I left,
12 that same exact day.

13 **Q.** Okay. And from any point in time from 1997,
14 when you moved in, until your sentencing in 2006, did
15 you ever become aware that there was gang activity in
16 the Ida B. Wells Homes?

17 MR. TEPFER: Objection to the form.

18 Go ahead.

19 BY THE WITNESS:

20 **A.** So I would say no -- in my opinion, I would
21 say no because I didn't grow up around gangs. So when
22 I -- when you talk about gangs, I'm thinking of seeing
23 like the same color, like they're wearing the same color
24 and shouting out gang names and gang signs and things

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1 like that, and that's -- I have not -- no.

2 BY MS. OLIVIER:

3 Q. Were you aware that there was a specific gang
4 or group of individuals that was in charge or running
5 your building, 527?

6 MR. TEPFER: Objection to form.

7 Go ahead.

8 BY THE WITNESS:

9 A. No.

10 BY MS. OLIVIER:

11 Q. When Ben returned from prison in 1997, did he
12 make any indication to you that he was a Gangster
13 Disciple at that time?

14 A. From the -- let me see. The first time, I
15 think I said no. So the second -- oh, this is the third
16 time. No, he did not.

17 Q. Besides being close to your family, was there
18 a reason why you chose the -- the Wells versus a
19 different area of the city?

20 MR. TEPFER: Objection, asked and answered.

21 You can answer again.

22 BY THE WITNESS:

23 A. No. It was just close to my parents' home.
24 My parents did offer for me to -- for them to purchase

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1 me a house, but I am an independent person, and I chose
2 this location that they helped me with, where I knew
3 that I was able to take care of everything on my own.

4 BY MS. OLIVIER:

5 Q. Have you heard the Ida B. Wells Homes referred
6 to as "The Projects"?

7 A. Yes.

8 Q. How did your family feel about you living
9 there versus a home that they were willing to purchase
10 for you?

11 MR. TEPFER: Objection to form, calls for
12 speculation.

13 You can answer.

14 BY THE WITNESS:

15 A. Well, I would assume that a real parent or a
16 good parent would want the best for their -- their kids
17 or, you know, child. So they probably wasn't -- me
18 assuming, probably wasn't happy or as happy, but
19 supported my decision of trying to do things on my own.

20 BY MS. OLIVIER:

21 Q. When you first moved in in 1997, did you ever
22 witness what you perceived to be criminal activity?

23 A. No.

24 Q. Did you ever see anything suspicious going on?

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1 MR. TEPFER: Objection, vague, form.

2 BY THE WITNESS:

3 A. No.

4 BY MS. OLIVIER:

5 Q. When you first moved in in 1997, did you ever
6 hear anyone yelling out things like "Blows"?

7 A. No.

8 Q. "Rocks"?

9 A. No.

10 Q. "Xbox"?

11 A. What?

12 Q. Did you ever hear anyone yelling out "Xbox"?

13 A. Xbox, that's a -- what is that, a game --
14 you're talking about the game?

15 Q. That -- the -- the word. So if you haven't,
16 then the answer is no, but that's my question.

17 Did you ever hear anyone yelling out the
18 word "Xbox"?

19 A. No.

20 Q. Did you ever hear anyone yelling out
21 "Renegade"?

22 A. No.

23 Q. "7-11"?

24 A. No.

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1 Q. "Red line"?

2 A. No.

3 Q. "Powerball"?

4 A. No.

5 Q. After 1997 or once Ben came to live with you
6 and up until you left Apartment 206 in September or your
7 sentencing in 2006, was there ever any indication to you
8 that narcotics were being sold in the 527 building?

9 A. Yes.

10 Q. All right. When was your first perception
11 that narcotics were being sold?

12 A. I don't recall.

13 Q. Do you know approximately how long after it
14 was after you moved in?

15 A. Me speculating, no. I'm not going to
16 speculate. No.

17 Q. Do you know if it was more or less than one
18 year?

19 A. Speculation.

20 Q. I meant -- well, it's your testimony, so you
21 can --

22 A. And I said I'm not going to spec- -- I don't
23 want to speculate. I don't remember.

24 Q. Was it your last month that you first observed

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1 it?

2 MR. TEPFER: Last month living there?

3 MS. OLIVIER: Yes. That's what I'm asking.
4 I'm trying to get any sort of narrowing down here,
5 so...

6 BY THE WITNESS:

7 A. No, I don't have -- I don't have a time frame
8 for you.

9 BY MS. OLIVIER:

10 Q. Was it after Ben came to live with you and
11 your boys?

12 A. I can't recall. So the -- rewording of the
13 question is not going to help me. And it's no
14 disrespect to you. I don't recall.

15 Q. Beyond narcotic sales, did you ever see any
16 gun dealing going on?

17 A. What do you -- what do you mean by "gun" --

18 Q. People exchanging firearms for money.

19 A. No.

20 Q. Did you ever see anyone with firearms in the
21 527 building or anywhere else on the Ida B. Wells
22 premises?

23 A. No.

24 Q. Did you ever see Ben with a gun once he

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1 returned to your home in 1997?

2 **A.** Did I see him personally with a gun in his
3 hand? That's what you're asking?

4 **Q.** Yes.

5 **A.** No.

6 **Q.** Do you know that he ever possessed a firearm
7 beyond his charges for attempt murder and possession of
8 a firearm?

9 **A.** You said prior to his charges?

10 **Q.** After.

11 **A.** After his charges? So after his release in
12 '97?

13 **Q.** Yes.

14 **A.** And your question was, did I ever see Ben
15 possess any --

16 **Q.** Well, you already said you never saw him. So
17 I'm asking, do you -- do you have an understanding that
18 he did after he was released?

19 **A.** No.

20 **Q.** You seemed to hesitate.

21 MR. TEPFER: Objection, form.

22 BY THE WITNESS:

23 **A.** I answered.

24 BY MS. OLIVIER:

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1 Q. Is there a reason for your hesitation?

2 A. I didn't know I was --

3 MR. TEPFER: Objection, form.

4 BY THE WITNESS:

5 A. -- hesitating.

6 MR. TEPFER: Let me finish my objection.

7 THE WITNESS: I'm sorry.

8 MR. TEPFER: You can answer now. Go ahead.

9 BY THE WITNESS:

10 A. I didn't feel that I was hesitating.

11 BY MS. OLIVIER:

12 Q. Did you ever learn from anyone else that Ben
13 had access to a firearm after his --

14 A. No.

15 Q. -- release in '97?

16 A. No.

17 Q. Do you remember the names of any of your
18 neighbors in the 527 building? Or other residents; not
19 necessarily a specific neighbor.

20 A. I remember a neighbor, yes.

21 Q. Okay. What is that neighbor's name?

22 A. I called him -- he introduced his self as
23 Chili.

24 Q. How would you spell that?

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1 **A.** I don't know. C-h-i-l-i maybe.

2 **Q.** Oh, Chili?

3 **A.** Yes.

4 **Q.** Okay. Did you ever learn his name that was on
5 his birth certificate?

6 **A.** The neighbor?

7 **Q.** Yeah. Did you ever know anything other than
8 his nickname?

9 **A.** No, I -- I didn't know his government name.
10 When he -- this is just helping him. But when he
11 passed -- I have an obituary. I didn't go to the
12 service. But I didn't even look at the name on the
13 obituary. But no.

14 **Q.** What unit did Chili reside in?

15 **A.** I was in 206. So literally next door. So I'm
16 assuming -- maybe that's 205. I -- yeah.

17 **Q.** Do you recall a man named Elgin Moore?

18 **A.** Yes.

19 **Q.** All right. And where -- how do you know Elgin
20 Moore?

21 **A.** From the building, the 527.

22 **Q.** Do you know if he was a resident there?

23 **A.** I know that his mom was a resident. So who
24 was on her lease, I was not aware of that.

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1 Q. Did he ever stay with his mother?

2 A. I don't know who stayed with who.

3 Q. Do you know his mother's name?

4 A. I called her, and she introduced herself as
5 Winky.

6 Q. Did Mr. Moore have a nickname?

7 A. I called him Elgin.

8 Q. Did you know anyone by the name of Sambo or
9 Selma?

10 MR. TEPFER: What was the second one?

11 MS. OLIVIER: I saw a "Selma." That might
12 have been a typo on my end.

13 BY MS. OLIVIER:

14 Q. Is that Sambo?

15 MR. TEPFER: Sambo or Selma is the question.

16 BY THE WITNESS:

17 A. I remember that name. I can't -- I can't
18 picture a face.

19 BY MS. OLIVIER:

20 Q. Does that ring true as -- to be someone that
21 was one of your neighbors, or you don't know?

22 A. I -- I believe that he would go down to see
23 someone in the apartment across from Chili, and it was
24 an altercation. So that's how I know. But I don't know

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1 him personally. I don't know him.

2 MR. TEPFER: Are we talking about Sambo or
3 Selma right now?

4 MS. OLIVIER: Sambo.

5 THE WITNESS: Sambo.

6 BY MS. OLIVIER:

7 Q. Did you know anyone that went by Shock?

8 BY THE WITNESS:

9 A. No, I don't know him. I heard of the name.

10 BY MS. OLIVIER:

11 Q. In what context did you hear the name?

12 A. Probably coming in or out the building and
13 someone was referring to him, his name.

14 Q. Do you know what this person looked like? Did
15 you ever see Shock in person?

16 A. I don't know what he looked like. I would
17 know if you had a picture. I'm sorry.

18 Q. Did you ever hear Ben reference Shock?

19 A. Not that I recall.

20 Q. Did you know Amica?

21 A. Yes.

22 Q. Who was Amica?

23 A. Amica was or -- was a resident that lived in
24 527, upstairs on the sixth floor. And she -- yeah,

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1 that's who she is.

2 Q. How did you know her?

3 A. She used to -- my boys and her boys are
4 similar in age. And her kids, I believe, went to my
5 kids' school. And then she also sold, like, food out of
6 her apartment, like junk food, as far as like nachos and
7 burgers and -- and type -- junk food out of her
8 apartment.

9 Q. Was there anyone else besides Amica that sold
10 food out of their apartments in 527?

11 A. Yes.

12 Q. Who else?

13 A. Winky.

14 Q. What type of food did she sell?

15 A. Nachos for sure. I think she used to sell
16 tacos, also, and mostly chips, juices, candy, soda.

17 Q. Are there any other names of residents at 527
18 or even any of the other buildings that you can recall?

19 A. The Parkers. It was a family that stayed
20 downstairs on the first floor. And there was another
21 family that I believe was related to the Parkers that
22 stayed on the first floor in a separate apartment. It
23 was a large family, yeah.

24 Q. What about Jamar Lewis?

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1 **A.** He didn't live in that building.

2 **Q.** Who is he?

3 **A.** Jamar Lewis.

4 **Q.** Yes.

5 **A.** That's who he is. I don't know your question.

6 **Q.** Who is he to you? How do you know him?

7 **A.** He's an associate, and I know him through Ben.

8 **Q.** Would you describe him as a friend?

9 **A.** Yes, I would. Even though I said associate,
10 but okay.

11 **Q.** When did you first meet him through Ben?

12 **A.** I can't recall that.

13 **Q.** When Ben got out of prison in 1997, did he
14 seek any employment?

15 **A.** Yes.

16 **Q.** Okay. Did he obtain any employment?

17 **A.** No.

18 **Q.** Okay. You had mentioned that you know that
19 you worked for Home Helpers [sic] for a period of time
20 when you were in the Ida B. Wells Homes.

21 What was Ben -- where was Ben working, or
22 what was he doing during that time?

23 **A.** I think you asked that question.

24 **Q.** I'm talking about after he was released from

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1 prison.

2 **A.** Oh, that's what you asked, too.

3 **Q.** You can answer.

4 **A.** What is the question again?

5 **Q.** What was Ben doing after he was released from
6 prison while you were working at the Home Helpers?

7 **A.** Doing as far as what?

8 **Q.** Did he have a job?

9 **A.** No.

10 **Q.** Were you aware that he was drug dealing during
11 that time period?

12 **MR. TEPFER:** Objection to the form of the
13 question.

14 **BY THE WITNESS:**

15 **A.** No.

16 **BY MS. OLIVIER:**

17 **Q.** When did you first become aware that Ben was
18 drug dealing?

19 **A.** I don't recall.

20 **MR. TEPFER:** Objection to the form of the
21 question.

22 **BY MS. OLIVIER:**

23 **Q.** Do you know how much money you were making at
24 Home Helpers?

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1 Did you answer? I'm sorry. I didn't hear
2 if you did.

3 **A.** Oh, I didn't hear -- I'm sorry. What did you
4 say?

5 **Q.** I said, how much money were you making when
6 you were working for Home Helpers?

7 **A.** When I was working at Help at Home?

8 **Q.** Or sorry. Help at Home. I'm sorry.

9 **A.** That's fine.

10 I don't remember. I think it was probably
11 minimum wage. But then I started doing live-ins, which
12 you get more when you do live-ins.

13 **Q.** So in your answers to interrogatories, you
14 indicated that from 1998 to 2000, you worked at Help at
15 Home, and then from 2003 to 2004, you worked at Security
16 Professional.

17 **A.** Okay.

18 **Q.** Did you hold any employment between 2000 and
19 2003?

20 **A.** Yes. Yes.

21 **Q.** Where were you working?

22 **A.** At UPS.

23 **Q.** How long did you work at UPS for?

24 **A.** A year and a half to two years. I started

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1 seasonal.

2 Q. Do you know what year you started and what
3 year you ended?

4 A. No.

5 Q. But it was in between this 2000 to 2003 time
6 period?

7 A. Yes.

8 Q. Were there any other jobs that you held during
9 that time?

10 A. Yeah. I was doing security, also, because
11 that was a night job, and then I would do -- and it was
12 part-time. Unless it was peak season. So I was working
13 part-time with the security -- when they have special
14 jobs. When, like, the auto show or they have, like,
15 housewares, certain types of shows going on like big
16 events at McCormick, then they would call because they
17 need more staff, and then I would work there during the
18 daytime, and then at night, it would be UPS.

19 Q. So during this time period when Ben is
20 unemployed and you're working at these jobs either
21 part-time or making minimum wage, how are you affording
22 your life, I guess, at that point? Did you get
23 assistance from your -- from other avenues?

24 A. I kind of maintained, but if I needed help, I

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1 can go to my parents or any of my family members. But I
2 kind of maintained, because as you are aware, that
3 Chicago Housing goes based on your income for the rent
4 guidelines. So that was not a -- a problem. And then
5 I'm sure you're aware that they pay some of the
6 utilities, and my utilities that I did have to take care
7 of was minimum. So my income was able to sustain that.

8 Q. Did Ben ever contribute financially to the
9 household during this time period of when he was
10 released from prison in 1997, let's say, up to 2004?

11 A. I would say probably in 2004.

12 Q. That was the first time?

13 A. Do you want to ask the question again?

14 Q. Was 2004 the first time Ben ever contributed
15 financially to your family's household expenses?

16 A. At 527 East Browning?

17 Q. Correct.

18 A. If I can recall, I would say yes.

19 Q. Prior to moving to 527 East Browning in 1997,
20 had Ben contributed financially to you and the boys and
21 your expenses?

22 MR. TEPFER: Objection, asked and answered.

23 MS. OLIVIER: Well, she just asked me -- the
24 reason I'm asking is because she asked me if I

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1 was -- what time period I was referring to. I'm
2 just wondering if there was a time period where he
3 ever contributed financially before 2004.

4 MR. TEPFER: You can ask whatever you want,
5 but -- I don't care about your reasons, but go
6 ahead. Ask your question.

7 BY MS. OLIVIER:

8 Q. Sure.

9 Just so we're clear, Clarissa, did he ever
10 contribute financially to you or the boys, your family
11 unit, prior to 2004?

12 A. Yes. He would help out sometimes, yes.

13 Q. How would he help out?

14 A. Financially.

15 Q. How -- was it cash, check? Where was he
16 get- -- what type of currency was he contributing?

17 A. Currency as far as cash currency?

18 Q. Or was it gifts? You tell me in what way --

19 A. You have to ask me. I don't know what you're
20 asking.

21 Q. What type of financial contributions was he
22 making?

23 A. Currency.

24 Q. Okay. How much would that currency be?

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1 MR. TEPFER: Objection to the form,
2 foundation.

3 You can answer, if you can.

4 BY THE WITNESS:

5 A. I have no direct answer for that. I don't
6 know. It varies. I don't -- I didn't keep a note of
7 it. Sorry.

8 BY MS. OLIVIER:

9 Q. When you were living together at 527 East
10 Browning, did you ever notice that there was cash in the
11 home?

12 MR. TEPFER: Objection to form.

13 But go ahead.

14 BY THE WITNESS:

15 A. I had cash in the home.

16 BY MS. OLIVIER:

17 Q. Did Ben have cash in the home?

18 A. Yeah, Ben did have cash in the home.

19 Q. How much cash would he store in the home in,
20 say, 1997?

21 MR. TEPFER: Objection to form, "store."

22 Go ahead.

23 BY THE WITNESS:

24 A. What do you mean, "store"?

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1 MS. OLIVIER: Objection, Josh, for the
2 coaching.

3 BY MS. OLIVIER:

4 Q. But how much --

5 MR. TEPFER: I wasn't --

6 BY MS. OLIVIER:

7 Q. You stated before that Ben would have cash in
8 your apartment. I'm wondering, say in 1997, how much
9 cash would he have on hand in the apartment at a time?

10 A. I -- I didn't keep -- like I said, I didn't
11 keep record of how much he had. Ben also had family.
12 So I'm sure that they gave him money or gifts or
13 whatever you want to say. I didn't -- I didn't know
14 that of me, go behind their mate to say, "Oh, how much
15 do you have," and keep records. I -- I don't know.

16 BY MS. OLIVIER:

17 Q. Do you know how much cash Ben had in
18 Apartment 206 in the family home in 1998?

19 A. No.

20 Q. If I -- what about 1999?

21 A. Again, no.

22 Q. 2000?

23 A. No.

24 Q. 2001?

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1 **A.** No.

2 **Q.** 2002?

3 **A.** No.

4 **Q.** 2003?

5 **A.** No.

6 **Q.** 2004?

7 **A.** No.

8 MR. TEPFER: At some point, I'm going to want
9 to take a break. Can you tell me when is a good
10 time?

11 MS. OLIVIER: We can take a break right now.
12 Do you want to do another five to seven minutes or
13 longer? Last time was about 15, so we could just
14 say 15.

15 MR. TEPFER: Okay. Do you want to eat
16 something?

17 THE WITNESS: I'm fine.

18 MR. TEPFER: I'm going to -- let's take -- a
19 15-minute break is fine.

20 MS. OLIVIER: Okay. Thanks.

21 THE VIDEOGRAPHER: We are now going off the
22 record at 1:33 p.m.

23 (Recess.)

24 THE VIDEOGRAPHER: The time is 1:49 p.m. We

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1 are now back on the record.

2 BY MS. OLIVIER:

3 Q. Hi, Ms. Glenn. Are you okay to continue?

4 A. Yes.

5 Q. Okay.

6 A. Thank you.

7 Q. In 2004, when -- you testified that that's
8 when you believe Ben started financially contributing to
9 the -- well, strike that.

10 Correct me if I'm wrong. When you say in
11 2004 Ben started financially contributing to the
12 household, is that in a more significant -- do you mean
13 that in a way that it was on a more significant basis
14 than prior to 2004?

15 A. I don't understand your question.

16 Q. Sure.

17 I think before you had said that -- when I
18 asked you, when did Ben start financially contributing
19 to the family household expenses, you had said that 2004
20 was the year that that started, but then you also
21 acknowledged that he did contribute financially
22 periodically prior to that. If that's incorrect, please
23 let me know. I just want to make sure your testimony is
24 as clear as possible on that issue?

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1 **A.** Again, I don't have a -- a certain year or
2 date or time when he started financially contributing.
3 I did not -- if I did see some money, I did not ask him,
4 where did it come from, or anything to that aspect.

5 **Q.** Knowing that he didn't have a job, were you
6 concerned with where this money was coming from?

7 **A.** I don't understand your question.

8 **Q.** He didn't have any employment from the time
9 period of 1997 when he was released from prison up until
10 2004, correct? Is that correct?

11 **A.** That's true. That's true. Your question?

12 **Q.** Yes. Is that correct? Is what I stated
13 correct?

14 **A.** That he did not have employment from '97 to
15 2004?

16 **Q.** Yes.

17 **A.** Yes.

18 **Q.** Okay. So let me ask you this. When he would
19 be contributing to the financial household, is he
20 saying, "You know what, Clarissa, hey, I have 20 extra
21 bucks; here you go"? Or was it more substantial amounts
22 of money?

23 **A.** I don't recall neither.

24 **Q.** Do you know if it was more or less than a

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1 thousand dollars at a time that he would be contributing
2 to the household expenses?

3 **A.** Contributing -- contributing in what way? In
4 what way?

5 **Q.** You tell me. Do you understand the question?

6 **A.** No. You can help me. Can you help me out?

7 **Q.** Sure.

8 So you have a growing family of three boys
9 who I'm sure are very hungry and who I'm sure are
10 growing quickly and also need lots of clothes. You
11 need -- things come up in the home, whether something
12 breaks or you need new linens, just everyday
13 household -- I'm putting those under the category of
14 household expenses, you know, clothing for you and Ben,
15 food for the family, food for when people come over,
16 things like that. For the overall household expenses,
17 obviously, you're working. So I assume that you're
18 putting -- you're contributing your own funds to that.

19 And my question is, to the extent that Ben
20 contributed to those expenses as well, how much money
21 would he be contributing at a time in the course of a
22 month, let's say?

23 **A.** I don't recall.

24 **Q.** Did it vary over time? For example, in 1997

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1 when he first got out, maybe he wasn't contributing, but
2 by 2000, he was contributing on a regular basis?

3 **A.** I don't recall.

4 **Q.** Do you know how often he was providing you
5 with money to assist with your lives, household
6 expenses, anything like that?

7 **MR. TEPFER:** Objection, foundation.

8 **BY THE WITNESS:**

9 **A.** No.

10 **BY MS. OLIVIER:**

11 **Q.** From 1997 up to 2004, did the family ever take
12 any family vacations?

13 **A.** No, I don't recall any. No.

14 **Q.** And I know that you've already testified that
15 you cannot pin down a year when you realized that Ben
16 was dealing drugs. But were you aware that he was
17 getting arrested during the time -- this time period of
18 his release in 1997 through his -- through 2004?

19 **MR. TEPFER:** Objection to form.

20 **BY THE WITNESS:**

21 **A.** Can you ask that question one more time?

22 **BY MS. OLIVIER:**

23 **Q.** Sure.

24 **Were you aware that Ben was getting**

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1 arrested from this time period during 1997 through 2004?

2 MR. TEPFER: Same objection.

3 BY THE WITNESS:

4 A. I don't recall. I don't...

5 BY MS. OLIVIER:

6 Q. Do you remember Ben getting arrested on
7 March 12th, 2001, for possession of cannabis at the
8 527 building?

9 A. Yes.

10 Q. Do you -- were you present when this took --
11 when he was arrested?

12 A. No.

13 Q. How did you find out that he was arrested?

14 A. Seeing him leave out the building in
15 handcuffs.

16 Q. This was -- and I'm -- this is in 2001, you
17 recall this?

18 A. No. What I recall, you said weed. A weed
19 case. I didn't recall the year. I just --

20 Q. Okay. So --

21 (Simultaneous crosstalk.)

22 BY THE WITNESS:

23 A. Yes, ma'am.

24 BY MS. OLIVIER:

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1 **Q.** I can be a little more clear. So this arrest
2 was on March 12th, 2001, and it was a misdemeanor
3 offense of possession of cannabis.

4 Do you remember him being arrested for
5 that? It was dismissed later on.

6 **A.** For the weed, yes.

7 **Q.** Okay. Do you remember him being arrested on
8 April 1st, 2001, for soliciting unlawful business at the
9 527 building?

10 **A.** Soliciting -- no.

11 **Q.** Do you know what that charge is, soliciting
12 unlawful business?

13 **A.** No.

14 **Q.** It's essentially when someone's -- I'm trying
15 to figure out a better way to -- trying to do drug deals
16 essentially is usually what -- when it's charged.

17 MR. TEPFER: Objection to form.

18 BY MS. OLIVIER:

19 **Q.** Do you remember Ben being arrested for
20 disorderly conduct, a misdemeanor, on May 9th, 2001?

21 **A.** No.

22 **Q.** Do you remember Ben being arrested for
23 possession of a controlled substance with intent to
24 deliver, a felony charge, on February 4th, 2002?

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1 **A.** What? No. I -- I'm not familiar with the --
2 the year. I hear you telling me the dates and time
3 frame, but it's not -- so you said weed. That helped
4 me. I -- no, I'm not...

5 **Q.** He was ultimately found not guilty of that
6 charge on April 14th, 2003, if that rings a bell or jogs
7 your memory in any way as to that charge.

8 **A.** No.

9 **Q.** Okay. Did -- for all of those arrests that I
10 just listed out to you and you indicated that -- is it
11 true that the only one you actually remember is the weed
12 case from March of 2001?

13 **A.** Yes.

14 **Q.** Did he ever -- did Ben ever indicate to you
15 that he was being framed for those charges --

16 MR. TEPFER: Objection --

17 BY MS. OLIVIER:

18 **Q.** -- or talk to you about those charges?

19 MR. TEPFER: Objection to form, speculation.

20 Go ahead.

21 THE WITNESS: You said charges, more than one?

22 BY MS. OLIVIER:

23 **Q.** Let me rephrase the question.

24 With respect to the March 2001 possession

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1 of cannabis case, did Ben ever indicate to you that he
2 was framed for that case?

3 **A.** No.

4 **Q.** Okay. Did Ben -- with respect to the
5 remaining arrests that I listed out to you that you
6 don't recall, do you remember Ben ever speaking with you
7 about these arrests or officers planting drugs on him or
8 arresting him wrongfully during that time period of 2001
9 to 2002?

10 **A.** No.

11 **Q.** Going back to when Ben was arrested and ended
12 up subsequently bonding out on those -- the gun and
13 attempt murder charges in 1993, you mentioned he -- he
14 retained a private attorney?

15 **A.** Correct.

16 **Q.** Do you remember how much that private attorney
17 cost?

18 **A.** No.

19 **Q.** Do you remember who paid the bond that
20 ultimately allowed him to be released pending trial?

21 **A.** Family. My family and his.

22 **Q.** Do you know how much money that bond was?

23 **A.** 10,000.

24 **Q.** Did he have any cash lying around that you had

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1 access to that you were able to contribute to that bond
2 as well?

3 **A.** Did he have cash laying around?

4 **Q.** Yes.

5 **A.** Not that I recall.

6 **Q.** Ben was -- as a result of some of the claims
7 that you're alleging in this lawsuit, Ben was sentenced
8 to a prison term, correct?

9 MR. TEPFER: Objection, form.

10 BY THE WITNESS:

11 **A.** I believe -- and, again, I apologize because
12 that's not my knowledge of -- of -- of the law, how it
13 works, but I assume that my claim was regarding the
14 situation that happened with me.

15 BY MS. OLIVIER:

16 **Q.** Sure. So --

17 **A.** Okay.

18 **Q.** -- both -- both you and Ben have a lawsuit
19 together, and part of the damages are related to Ben
20 serving a term of incarceration in prison, correct?

21 **A.** Yes.

22 **Q.** Because that obviously affected you as well?

23 **A.** Yes.

24 **Q.** Okay. And he was released in January of 2016,

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1 correct?

2 **A.** Yes.

3 **Q.** I want to kind of go to this time period of --
4 you stated that it's your memory that the date of your
5 sentencing for the December 11th, 2005, arrest, you left
6 the Ida B. Wells Homes?

7 **A.** Yes.

8 **Q.** Was that with your three boys as well?

9 **A.** Yes.

10 **Q.** Were they still living with you at the Homes
11 at that time?

12 **A.** Yes.

13 **Q.** Okay. Where did you move to?

14 **A.** The address was 817 East 47th Place.

15 **Q.** How long did you live at that address for?

16 **A.** I believe it was two to three years.

17 **Q.** Where did you move after that?

18 **A.** 60 -- I believe the address was 6217 South
19 Drexel, 62nd and Drexel. And that's in Chicago.

20 **Q.** I also have an address at 4140 South Drexel.
21 Did you ever live there?

22 **A.** No.

23 **Q.** So 6217 South Drexel. How long did you live
24 at that address for?

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1 **A.** I would say the most would be -- I would also
2 say, like -- I would probably say, like, three years,
3 maybe a little over.

4 **Q.** After that address, where did you move to?

5 **A.** 62 -- 6215. 62nd and Rhodes. I believe
6 it was 6215 South Rhodes, and that's located in Chicago.

7 **Q.** Did you move to that address in approximately
8 2011 or 2012?

9 **A.** I would say yes. Approximately, yes.

10 **Q.** How long did you live at that address for?

11 **A.** About two and a half years, maybe.

12 **Q.** So that brings us to about 2014, 2015. Where
13 did you live after that?

14 **A.** I apologize.

15 **Q.** If it's easier, instead of going by how long
16 you lived there, if you remember the year that you left,
17 that -- that works as well.

18 **A.** I was thinking in my mind about Christmas.
19 I'm trying to picture, like, Christmas or a holiday or
20 something. That's how I kind of reference the time
21 frame. So I apologize.

22 I would say maybe -- I don't know. Give
23 me one second. Let me just think.

24 **Q.** Sure.

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1 You had answered some answers to
2 interrogatories.

3 **A.** Okay.

4 **Q.** And you had stated that as of the time of
5 answering in 2017, you were residing at 6215 South
6 Rhodes.

7 **A.** So I know on 40 -- can I go back?

8 **Q.** Sure.

9 **A.** I know on 47th Place, I was there probably
10 approximately, like, three years.

11 **Q.** Okay.

12 **A.** Then on Drexel, it would be between three and
13 four years. And then on Rhodes, which is 62nd and
14 Rhodes, would be about three years. And it would give
15 or take for all of those.

16 **Q.** When did you move -- and did you move from the
17 Rhodes address to your current address?

18 **A.** Yes, ma'am.

19 **Q.** Okay. So when did you move to your current
20 address?

21 **A.** Like 20 -- I believe maybe the end of 2016 or
22 2017. I'm thinking like 2017 to current.

23 **Q.** So when you answered these --

24 **A.** 2018. 2018. 2017 or 2018 to current.

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1 **Q.** Okay. Because you -- you signed your answers
2 to interrogatories as the Rhodes address being your
3 residence on April 20th, 2017. So the 20 -- so you tell
4 me what time period sounds about right in terms of when
5 you moved to your current residence.

6 **A.** Okay.

7 **Q.** You tell me. What -- what do you think, the
8 end of 2017?

9 **A.** It sounds about right, yes, ma'am. Thank you.

10 **Q.** Also, just -- and I'm sorry I'm jumping around
11 a little bit here.

12 But after you were employed at Security
13 Professionals, your answers to interrogatories have
14 stated that that employment, you stopped working there
15 in 2004. Does that still ring true to you?

16 **A.** A little, yes.

17 **Q.** Okay. And then you became employed at
18 Comprehensive Quality Health Care?

19 **A.** No. I -- I think when I -- after the Security
20 Professionals, I started working at the Help at Home.

21 **Q.** Again?

22 **A.** What year did you ask me?

23 **Q.** So just to kind of recap the work history
24 we've gone over so far, you worked at a convenience

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1 store kind of right around 1990 once you stopped
2 attending Dawson. You -- your next memory of employment
3 was working at Help at Home, which we had that year --
4 in your answers to interrogatories, you've listed from
5 1998 to 2000. Your next place of employment was
6 Security Professionals from 2003 to 2004. And then in
7 your -- again in your discovery responses, that you
8 started working at Comprehensive Quality Health Care in
9 2004 to 2014.

10 **A.** It was the convenience store. It was the
11 convenience store first of employment. Then it was
12 Securities Professional with -- Security Professionals
13 only, and then it went to Security Professionals and
14 UPS. And then it went to Help at Home. And then it
15 went to working for Comprehensive Quality Care. That
16 was the order of the employment.

17 **Q.** Okay.

18 **A.** And I --

19 **Q.** Okay. So the answers to interrogatories that
20 we have right now are not in the correct sequence of
21 time, it sounds like?

22 **A.** Yes.

23 **Q.** Okay. Did -- did you file taxes for all of
24 those years?

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1 **A.** Yes.

2 **Q.** Okay.

3 **A.** Yes.

4 **Q.** All right. So I guess we'll get there, but we
5 might -- we can maybe check with your social security or
6 W-2 records for that.

7 **A.** Okay.

8 **Q.** Jumping ahead a bit to when Ben was released
9 from prison in January of 2016. And at this point, you
10 had gotten divorced, correct?

11 **A.** Yes.

12 **Q.** Do you recall when you first filed a petition
13 to divorce Ben Sr.?

14 **A.** I believe it was 2015, in November or
15 December. October, November, or December.

16 **Q.** Okay. Did you -- do you know if you filed a
17 petition to divorce Ben prior to getting the actual
18 judgment, like years ahead of time?

19 **A.** I don't -- I don't understand.

20 **Q.** Okay. I'll -- I'll come back to that in a
21 sec.

22 When he was released from prison in
23 January of 2016, you were obviously divorced. Did he
24 come live with you right away?

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1 **A.** No.

2 **Q.** Okay. Where did he go when he was first
3 released?

4 **A.** I'm not for sure.

5 **Q.** About -- did -- eventually, did he come to
6 live with you at your home?

7 **A.** Eventually, yes.

8 **Q.** All right. And this was the home at 62nd and
9 Rhodes, correct?

10 **A.** Yes.

11 **Q.** Do you know if it was more or less than six
12 months after his release, within a month of his release,
13 a couple of weeks?

14 **A.** I would say with- -- within a month to two
15 months. A month, month and a half after his release.

16 **Q.** Who else was living in your home with you at
17 that time?

18 **A.** Ben Jr., Gerard, and Deon. Their last name is
19 Baker.

20 **Q.** How did it come about that he began living
21 with you again?

22 **A.** Conversation.

23 **Q.** In person, over the phone?

24 **A.** In person.

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1 **Q.** Had you been commun- -- after you divorced,
2 had you been still communicating with him while he was
3 in prison or did that cease?

4 **A.** That ceased.

5 **Q.** When did you first start speaking with him
6 once he was released or when -- strike that.

7 After you were divorced, when was the next
8 time you began speaking with him again?

9 **A.** After he was released.

10 **Q.** Was there any discussion of ground rules for
11 him coming to live with you?

12 MR. TEPFER: Objection to form.

13 You can answer.

14 BY THE WITNESS:

15 **A.** No.

16 BY MS. OLIVIER:

17 **Q.** Ms. Glenn, do you need a minute?

18 **A.** Yeah.

19 **Q.** That's fine.

20 **A.** Yes.

21 MS. OLIVIER: Let's take a break, and we can
22 come back. Okay?

23 Off the record, please.

24 THE VIDEOGRAPHER: We are now going off the

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1 record at 2:14 p.m.

2 (Recess.)

3 THE VIDEOGRAPHER: One second. One second.
4 One moment, please.

5 The time is 2:18 p.m. We are now back on
6 the record.

7 BY MS. OLIVIER:

8 Q. All right, Ms. Glenn. I meant what I said at
9 the beginning. If at any point you need to take a
10 break, we can do that. Just let me know. Okay?

11 A. Thank you very much. Thank you.

12 Q. Okay. So the last question I had asked, which
13 I don't believe I got an answer to, was just after you
14 had these discussions about him coming back -- or the
15 conversation about him coming to live with you, after
16 his release in January of 2016, was there any discussion
17 between the two of you about ground rules for him coming
18 to live in your home?

19 A. No.

20 Q. Okay. Did he discuss with you a plan for
21 income that he had?

22 A. No.

23 Q. Did you need him to get a job in order to live
24 with you?

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1 **A.** No.

2 **Q.** Did you want him to get a job?

3 **A.** I wanted him to be happy.

4 **Q.** Do you know if he was applying for jobs once
5 he was released and living with you?

6 **A.** Yes.

7 **Q.** Did he ultimately secure employment?

8 **A.** Can you repeat that, please?

9 **Q.** Did he ultimately secure employment and find a
10 job?

11 **A.** Can you rephrase that?

12 **Q.** Sure.

13 You mentioned he was applying to jobs.

14 **A.** Correct.

15 **Q.** So did he -- did any of those pan out?

16 **A.** No.

17 **Q.** Okay. When he returned to living with you in
18 January of 2016, how old were the boys at that time?

19 **A.** I believe they were in their 20s, I believe.
20 Their early 20s.

21 **Q.** So they obviously didn't need to be looked
22 after by him, I guess, not -- no need for him to serve
23 in a childcare capacity? Is that true?

24 **A.** What is your question?

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1 **Q.** Sorry.

2 They were old enough you didn't need to
3 look after them? They were self-sufficient on their
4 own?

5 **A.** Look after them like how?

6 **Q.** I'll -- strike that. I'll move on.

7 Did Ben tell you any plans for his
8 day-to-day life?

9 MR. TEPFER: Objection to form.

10 Go ahead.

11 BY THE WITNESS:

12 **A.** No.

13 BY MS. OLIVIER:

14 **Q.** When he first returned to the family home, how
15 was your relationship with him?

16 **A.** It was rocky.

17 **Q.** How was his relationship with your sons?

18 **A.** Wonderful.

19 **Q.** Did you and Ben take any vacations together
20 once he was released and -- after 2016?

21 **A.** When he was released to current?

22 **Q.** Yes.

23 **A.** Since he's been released to current, yes.

24 **Q.** What are some of the vacations you -- or have

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1 there been multiple vacations?

2 **A.** No.

3 **Q.** Just one?

4 **A.** Yes.

5 **Q.** Where did you go?

6 **A.** Wisconsin Dells.

7 **Q.** When was this?

8 **A.** May -- May of 2020. No. Wait. Hold on. May
9 of 2021.

10 **Q.** A few months ago?

11 **A.** May.

12 **Q.** This past May?

13 **A.** Yes, ma'am.

14 **Q.** Okay. Did you and Ben go on a cruise with
15 Jamar Lewis in 2017?

16 **A.** We did. I can't recall the year.

17 **Q.** Okay. So that's another vacation you took
18 together?

19 **A.** Yes.

20 **Q.** Okay. So some -- the question is clear, I'm
21 asking for any vacations you and Ben took from his
22 release in January of 2016 to today's date.

23 **A.** And I understand. And I actually forgot about
24 that, because that's our second cruise and I was just

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1 thinking of the first cruise. That's what I was kind of
2 thinking.

3 Q. Okay. When was your first cruise with Ben,
4 Sr.?

5 A. I know that was a time when he was on
6 probation.

7 Q. In the '90s?

8 A. When he was on probation, I believe so. That
9 would be the first cruise.

10 Q. Was this before or after you had children?

11 A. This would be after we had children.

12 Q. Okay. Was this before or after he was
13 arrested for the attempt murder in '93?

14 A. I believe it would be after.

15 Q. I'm wondering, do you -- instead of probation,
16 do you think it could have been when he was out on bond
17 for that possession of a controlled substance I
18 mentioned to you earlier which he was arrested for in
19 2002?

20 A. It could have been.

21 Q. Okay. Back when you took that first cruise,
22 where was it to?

23 A. Cabo, Mexico.

24 Q. How long was it?

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1 **A.** We were gone for a week.

2 **Q.** Did you bring the boys with you?

3 **A.** No.

4 **Q.** Did you go with any friends?

5 **A.** No. That -- no. Just me and him.

6 **Q.** Do you remember how much it cost?

7 **A.** I think it was very inexpensive. It was,
8 like, 1300 or something, I believe. But it was really
9 inexpensive.

10 **Q.** Both -- for both of you or just one or each?

11 **A.** I believe it was for both of us.

12 **Q.** How did you pay for it?

13 **A.** I wanted to do a cruise and got the
14 information by calling, talking to cruise lines and
15 people in that nature, and you can -- I was able to pay
16 every month prior to -- prior to the cruise. It had to
17 be paid completely in full a couple of weeks, I believe,
18 before the cruise departs.

19 **Q.** Sadly, Chicago, Illinois, does not border the
20 Gulf of Mexico. So did you have to fly somewhere in
21 order to get on the cruise?

22 **A.** Yes.

23 **Q.** Okay. Where -- was that flight included in
24 the \$1300, or was that in addition to the \$1300?

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1 **A.** It was included.

2 **Q.** During your times of employment, did you use a
3 bank account or would you use, like, a check cashing
4 agency whenever you would get paid?

5 **A.** A banking account.

6 **Q.** Okay. Did you have a checking and savings?

7 **A.** I did not have one -- I mean, both. I only
8 had one, so...

9 I believe -- it was a checking account.

10 **Q.** Was Ben's name on that checking account with
11 you?

12 **A.** No.

13 **Q.** Was there anyone else listed or that had
14 access to that account besides you?

15 **A.** No.

16 **Q.** What bank was that checking account with?

17 **A.** The first was TCF Bank.

18 **Q.** And then you switched at some point?

19 **A.** Yes.

20 **Q.** And what did you switch to?

21 **A.** Chase.

22 **Q.** Are you still with Chase to this day?

23 **A.** Yes.

24 **Q.** On the Chase account, is it still just one

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1 checking account?

2 **A.** No.

3 **Q.** Okay. What else -- what other accounts do you
4 have now?

5 **A.** Checking and savings.

6 **Q.** When did you switch from TCF to Chase?

7 **A.** Over -- it's been awhile. Over 20 years.

8 **Q.** Has Ben ever been listed on that account with
9 you?

10 **A.** On what account?

11 **Q.** The Chase account.

12 **A.** When?

13 **Q.** My question was, has he ever been listed on
14 that account?

15 **A.** Yes.

16 **Q.** Okay. When -- what years was he listed or is
17 he listed on the -- those accounts?

18 **A.** Wait a minute. Maybe, like, three years ago,
19 if that, when he started his first job.

20 **Q.** After he was released from prison in 2016. So
21 it's been recent?

22 **A.** He wasn't on the account in 2016.

23 **Q.** Okay.

24 **A.** I don't recall the year that he started his

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1 first employment. And then that would be the time that
2 he got onto the account.

3 Q. In 2017, do you recall which month it was that
4 you went on a cruise with Jamar Lewis?

5 A. No, I do not.

6 Q. Do you know what season?

7 A. I believe it was the summer, in the summer.

8 Q. How long was that cruise?

9 A. I'm thinking maybe four to five days.

10 Q. Besides yourself, Ben, Sr., and Jamar Lewis,
11 was there any other friends or family on that cruise
12 with you?

13 A. Yes.

14 Q. Who else was on the cruise with you?

15 A. A young lady named Ottenyse.

16 Q. How do you spell that, if you know?

17 A. O-t-t-e-n-y-s-e, maybe.

18 Henry and a young lady that accompanied --
19 accompanied him. I don't know her name.

20 Q. Do you know Ottenyse or Henry's last names?

21 A. Ottenyse, I believe, is Brown, I believe. I'm
22 assuming.

23 But for Henry, no, I don't know his last
24 name.

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1 **Q.** And how do you know -- we've already discussed
2 how you know Jamar Lewis.

3 How do you know Ottenyse and Henry?

4 **A.** I know Ottenyse through Jamar Lewis. And
5 Henry, I would say from Jamar Lewis.

6 **Q.** Was Ottenyse, for lack of a better term, Jamar
7 Lewis's date or companion for the trip?

8 **A.** Yes.

9 **Q.** Okay. And you don't know the name of Henry's
10 companion?

11 **A.** No.

12 **Q.** Where was the cruise to?

13 **A.** To Cabo.

14 **Q.** Where did -- oh, and I didn't really ask with
15 the first cruise. Where did you fly to from Chicago to
16 go to your first cruise?

17 **A.** Miami.

18 **Q.** And where did you fly to from Chicago to go on
19 this 2017 cruise?

20 **A.** I believe it was Florida.

21 **Q.** Do you know how much the 2017 cruise cost?

22 **A.** I believe -- I believe it was maybe between --
23 and this is me estimating.

24 Between 15- and 1800.

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1 Q. Who paid for the 2017 cruise?

2 A. I did.

3 Q. Did Ben, Sr., contribute in any way?

4 A. No.

5 Q. What -- also -- focusing on 2017, obviously,
6 Ben was living with you at the Rhodes address still at
7 this time, correct?

8 A. Yes.

9 Q. You were working -- or where were you --
10 after -- strike that.

11 Is it true that as of November of 2016,
12 you began working full-time as an office receptionist at
13 Dental Dreams?

14 A. Yes.

15 Q. Okay. Are you still working there today?

16 A. No.

17 Q. Okay. How long did you work for Dental Dreams
18 for, or when did you stop working there?

19 A. When COVID hit.

20 Q. So everything kind of shut down in March of
21 2020. So --

22 A. So I still did part-time in, like, April of
23 2020. So I would say April.

24 Q. Are you currently employed?

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1 **A.** Yes.

2 **Q.** When -- where are you currently employed?

3 **A.** Gentle Dental.

4 **Q.** Where is that located?

5 **A.** 2917 West 63rd Street. And that's in Chicago.

6 **Q.** What is your job title there?

7 **A.** Compliance.

8 **Q.** What does that entail?

9 **A.** Billing, payments.

10 **Q.** How much money do you make per hour there, or
11 are you salary?

12 **A.** 13.50 an hour.

13 **Q.** When did you start working there?

14 **A.** Earlier this year, 2021.

15 **Q.** Did you hold any employment between roughly
16 April --

17 **A.** Hang on.

18 It was actually, like, November, October
19 or November of 2020.

20 **Q.** Did you hold any employment between April of
21 2020 until you starting this job at Gentle Dental?

22 **A.** No.

23 **Q.** What are your hours and days of employment at
24 Gentle Dental?

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1 **A.** My days would be Monday, Wednesday, Thursday,
2 and Friday, and the hours would vary according to the
3 patients' schedule, appointments.

4 **Q.** Are you considered a full-time employee there?

5 **A.** No.

6 **Q.** How many hours a week do you work on average?

7 **A.** Maybe 15 to 20.

8 **Q.** Are you working at any other jobs in addition
9 to Gentle Dental?

10 **A.** No.

11 **Q.** When you were working at Dental Dreams, how
12 much money were you making in 2017?

13 **A.** I believe it went up to either 14.50 or 15.50.

14 **Q.** What were the -- your days and hours working
15 at Dental Dreams?

16 **A.** Full-time. The days would vary. Varied. But
17 not working on Sunday.

18 **Q.** So it could be any day Monday through
19 Saturday, but it would vary depending on what was going
20 on at the office?

21 **A.** It would -- depends on the schedule.

22 **Q.** What were your hours in terms of 9:00 to 5:00
23 or 8:00 to 4:00?

24 **A.** Start time would be -- I believe it was 9:00.

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1 It would be, like, 9:00 to 8:00. 9:00 a.m. to
2 8:00 p.m., sometimes later.

3 Q. Because that's longer than an eight-hour
4 workday, would you be working less than five days a
5 week, or were you working over 40 hours a week?

6 A. Some -- some weeks it would be over 40 hours.

7 Q. Where was the Dental Dreams location?

8 A. The street is 83rd and Holland Road. 8301
9 South Holland.

10 Q. How far away was that from your -- strike
11 that.

12 How long did it take you to drive to
13 Dental Dreams in the morning on your way to work?

14 A. Maybe ten minutes.

15 Q. What time would you typically leave?

16 A. It depends on the -- the work schedule, the
17 hours that I was scheduled to work.

18 Q. Understanding that the schedule changed, were
19 there times where you were working six days a week, or
20 would it always be five days or less or four days or
21 less?

22 A. I would always have five days a week. Always.

23 Q. And then sometimes if you were busy, the
24 schedule was busy, you'd have to come in on a Saturday?

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1 **A.** We would be open on a Saturday, but sometimes,
2 yes.

3 **Q.** Okay. During 2017, was Ben working anywhere?

4 **A.** I don't know when he actually started his job,
5 so I can't answer that.

6 **Q.** Is he currently employed?

7 **A.** Yes.

8 **Q.** Okay. Where is Ben currently employed?

9 **A.** With J.B. Hunt Trucking.

10 **Q.** Do you know how long he's been working for
11 that company for?

12 **A.** For that particular company, now it's been
13 over a year. So a year and probably a month or two.

14 **Q.** So you're unsure if he was working in 2017?

15 MR. TEPFER: Objection, asked and answered.

16 BY THE WITNESS:

17 **A.** Yes.

18 BY MS. OLIVIER:

19 **Q.** In addition to your family that we've
20 discussed, the three boys and Ben, was there anyone else
21 that would ever come stay with you at the Rhodes
22 address?

23 **A.** What do you mean, "stay"?

24 **Q.** Anyone that would come visit for an overnight

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1 or a couple of days, weeks at a time?

2 **A.** Maybe family if we -- maybe family.

3 **Q.** Do you recall Jamar Lewis ever coming over to
4 your home on Rhodes?

5 **A.** Yes.

6 **Q.** How often would he come to your house at -- on
7 Rhodes?

8 **A.** To me, I would say not often, in my opinion.

9 **Q.** What does "not often" mean to you?

10 **A.** Out of seven days of the week, I might see him
11 maybe once or twice.

12 **Q.** And where would you -- would you see him
13 physically within your home?

14 **A.** Sometimes.

15 **Q.** Other times, where would he be?

16 **A.** Outside the home.

17 **Q.** Who would he be visiting with?

18 **A.** Ben Baker, Sr.

19 **Q.** And just so I'm clear, we're talking about in
20 2017? This is the time period we're talking about?

21 **A.** Yeah. On Rhodes, correct?

22 **Q.** Yes.

23 **A.** Yes. Yes.

24 **Q.** How long would he stay at your home during

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1 these visits?

2 MR. TEPFER: Objection --

3 BY THE WITNESS:

4 A. I didn't --

5 MR. TEPFER: Objection to foundation and form.

6 Go ahead.

7 BY THE WITNESS:

8 A. I don't know.

9 BY MS. OLIVIER:

10 Q. Would he be coming over while you were
11 working?

12 MR. TEPFER: Objection, calls for speculation.

13 BY THE WITNESS:

14 A. I'm not for sure.

15 BY MS. OLIVIER:

16 Q. How would it be that you knew that he was at
17 your home?

18 MR. TEPFER: Objection, form.

19 Go ahead.

20 BY THE WITNESS:

21 A. I would see him out of the seven days, at
22 least, like, once or twice.

23 BY MS. OLIVIER:

24 Q. And what would you -- would you be going to

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1 work, coming home from work? Would it be your day off?

2 **A.** It might -- varies. I don't believe going to
3 work, no. So it varies, but going to work, no. And
4 then it -- no, I don't believe so.

5 **Q.** And before you stated that you would be
6 getting off of work at 8:00 p.m. So you would be
7 arriving home at, you know, 8:15 maybe?

8 **MR. TEPFER:** Objection, mischaracterizes the
9 testimony.

10 Go ahead.

11 BY THE WITNESS:

12 **A.** Sometimes it would be later than 8:00.

13 BY MS. OLIVIER:

14 **Q.** And so that would sometimes be occasions where
15 you would see Jamar Lewis at your home, would be after
16 8:00 p.m.?

17 **A.** From my recollection, I would say no. I
18 worked long hours there. I worked long hours there.

19 **Q.** Right. So -- but you also mentioned that in
20 spite of these long hours, you do recall seeing Jamar
21 Lewis at your home one to two times per week?

22 **A.** Yes.

23 **Q.** So would it have always been on days that you
24 weren't working that you saw him?

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1 **A.** Probably -- most likely.

2 **Q.** Okay. Do you know around what -- usually --
3 was there a certain time of day that you would see him
4 at your home?

5 **A.** No.

6 **Q.** Okay. Do you recall any specific instances of
7 times that you saw him at your home, whether inside or
8 outside?

9 **A.** No.

10 MR. TEPFER: Objection to form.

11 BY MS. OLIVIER:

12 **Q.** In 2017, how many vehicles did your household
13 have?

14 **A.** One.

15 **Q.** And what type of vehicle was it?

16 **A.** A car.

17 **Q.** What was the make and model?

18 **A.** A Cadillac. Vehicle.

19 **Q.** What color?

20 **A.** Black.

21 **Q.** Would you -- who would use the car during the
22 day?

23 MR. TEPFER: Objection, calls for speculation.

24 Go ahead. I think that's -- I'll withdraw it.

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1 Go ahead. If you know.

2 BY THE WITNESS:

3 **A.** You have to -- I -- I don't understand your
4 answer [sic].

5 BY MS. OLIVIER:

6 **Q.** Sure.

7 How did you get to work in the morning?

8 **A.** Sometimes I would drive, or Ben would take me.

9 **Q.** Would Ben take you more often than you drove
10 yourself, taking the car with you?

11 **A.** I would say maybe it might be the same. It
12 might be equal.

13 **Q.** About 50/50?

14 **A.** Yeah.

15 **Q.** And, obviously, if Ben drove you, he would
16 have to come pick you up at night?

17 **A.** Yes.

18 **Q.** Were you ever at home during the workweek
19 during 2017 while you were working for Dental Dreams?

20 **A.** I'm sure I was.

21 **Q.** Besides Jamar Lewis, do you remember -- and
22 I'm sorry. Strike that.

23 When I say, when you -- were you ever home
24 during the workweek, I'm saying -- what I mean is, were

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1 there ever days of the week, say a Tuesday, where you
2 did not have to work at Dental Dreams due to the
3 schedule, so you would be home?

4 **A.** Correct.

5 **Q.** Okay. Do you -- besides Jamar Lewis, do you
6 recall anyone else coming over to your home?

7 **A.** Yes.

8 MR. TEPFER: Are we still talking about 2017?

9 MS. OLIVIER: Yes.

10 BY THE WITNESS:

11 **A.** Yes.

12 BY MS. OLIVIER:

13 **Q.** Who else?

14 **A.** Family.

15 **Q.** Okay. Anyone else beyond family?

16 **A.** Friends.

17 **Q.** Okay. What are some of the names of those
18 friends?

19 **A.** Olfinley. I can't recall everyone. Ottenyse.

20 **Q.** And is it the same --

21 **A.** Jamar.

22 **Q.** I'm sorry. And is this the same Ottenyse that
23 came with you on the cruise?

24 **A.** Yes.

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1 **Q.** Is there anyone else that you -- any other
2 friends you remember coming over?

3 **A.** No, not really.

4 **Q.** Do you know if you were home on Friday,
5 March 3rd, 2017, at 10:10 a.m. and 4:31 p.m.?

6 **A.** I do not recall.

7 **Q.** Do you recall anyone coming over to your home
8 at 10:10 a.m. that morning?

9 **A.** I don't even recall the day --

10 **Q.** Okay. So you also --

11 **A.** -- that you -- that day.

12 **Q.** All right. So you also don't recall anyone
13 coming over to your home at 4:31 that day, correct?

14 **A.** Or any time period, no.

15 **Q.** Do you know if you were working or home?
16 Strike that.

17 Do you know if you were home on Wednesday,
18 March 15th, 2017, at 1:05 p.m.?

19 **A.** No.

20 **Q.** Do you know if you were home on Thursday,
21 April 6th, 2017?

22 **A.** No.

23 **Q.** Do you know if you were home on Tuesday,
24 April 25th, 2017?

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1 **A.** No, ma'am.

2 **Q.** Do you know if you were home on May 3rd, 2017,
3 at 11:25 a.m.?

4 **A.** No, ma'am.

5 **Q.** Do you know if anyone came to your home
6 visiting your husband inside your residence on that
7 date?

8 **A.** On what day?

9 **Q.** May -- Wednesday, May 3rd, 2017.

10 **A.** No, ma'am.

11 **Q.** Do you know if you were home on Tuesday,
12 July 6th, 2017?

13 **A.** No.

14 **Q.** Do you know if you were home on Thursday,
15 August 17th, 2017?

16 **A.** No.

17 **Q.** Do you remember Jamar Lewis coming to your
18 home on September 3rd, 2017?

19 **A.** No.

20 **Q.** Are you aware that on that day, he came to
21 your home and mixed cocaine?

22 MR. TEPFER: Objection, argumentative.

23 Go ahead.

24 BY THE WITNESS:

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1 **A.** No.

2 BY MS. OLIVIER:

3 **Q.** On September 9th, 2017, do you recall being
4 home that date?

5 **A.** No.

6 **Q.** Do you know Latoya Mayfield?

7 **A.** What do you mean, do I know her?

8 **Q.** Do you recognize that name?

9 **A.** Yes.

10 **Q.** Okay. Do you know who -- the individual that
11 that name belongs to?

12 **A.** Again, what do you mean, do I know the name?

13 **Q.** How do you recognize the name?

14 **A.** I heard it from Jamar Lewis.

15 **Q.** In what context has he stated that name?

16 **A.** Overhearing him saying "me and Toya." They're
17 about to go out or something or go get something to eat.

18 **Q.** When did you overhear this conversation?

19 **A.** I don't remember.

20 **Q.** Who else was present when you overheard this
21 conversation?

22 **A.** Ben.

23 **Q.** Was Jamar speaking directly to Ben?

24 **A.** Yes.

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1 **Q.** Where were you when this conversation took
2 place?

3 **A.** I don't remember.

4 **Q.** Do you know if this was in the year 2017 or
5 before or after that?

6 **A.** I -- I don't remember.

7 **Q.** Have you ever physically met Latoya Mayfield?

8 **A.** I believe she was sitting in a -- in a car and
9 Jamar was getting out of the car or going to the car or
10 they were switching -- I don't know the whole situation,
11 but he said, "Toya. Toya, there's Claire. Claire,
12 there's Toya." And it was just a hand -- a hand wave.

13 **Q.** Was Latoya driving the vehicle?

14 **A.** I don't remember that.

15 **Q.** What type of car was it?

16 **A.** I think it was like a white truck.

17 **Q.** When you say "truck," like a pickup truck?

18 **A.** With a flat in the...

19 **Q.** Right. So I would differentiate -- just so
20 it's clear, I would differentiate a pickup truck from --
21 which has, like, a bed on the back versus an SUV, which
22 I know people also refer to as a truck. So which are
23 you referring to?

24 **A.** An SUV.

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1 **Q.** Okay. Do you know the make or model of the
2 SUV?

3 **A.** No.

4 **Q.** Do you know when you saw -- physically saw her
5 in this vehicle?

6 **A.** No.

7 **Q.** Are you aware that on September 9th, 2017,
8 someone in your residence handed Latoya a shoebox full
9 of a kilo of heroin?

10 **A.** No.

11 **Q.** Did you ever see any shoeboxes full of heroin
12 or other drugs in your home?

13 **A.** No.

14 **Q.** Going back to living at Ida B. Wells, I know
15 we had discussed that you kept cash in the home and
16 Ben, Sr., kept cash in the home as well.

17 Was there a designated area in Apartment
18 206 that you would keep this money?

19 **A.** I would keep my money in my purse probably or
20 on the entertainment stand.

21 **Q.** Where did Ben keep his money?

22 **A.** I'm assuming that he would keep it in his
23 pocket or -- I don't know.

24 **Q.** Did he ever -- did you ever see him with large

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1 amounts of cash?

2 MR. TEPFER: Objection to form.

3 BY THE WITNESS:

4 A. What's large amounts of cash?

5 BY MS. OLIVIER:

6 Q. More than \$500.

7 MR. TEPFER: Objection to foundation.

8 BY THE WITNESS:

9 A. I would say I am not for sure because I didn't
10 count his money. I had no reason to count his money.
11 So I can't answer that.

12 BY MS. OLIVIER:

13 Q. Have you ever seen what a thousand dollars
14 looks like in cash?

15 MR. TEPFER: Objection, form.

16 BY THE WITNESS:

17 A. Like a thousand dollars, like literally in
18 cash a thousand dollars?

19 BY MS. OLIVIER:

20 Q. Yes. Yes.

21 A. In my lifetime?

22 Q. Yes.

23 A. Yes. Yes.

24 Q. Okay. So understanding that you -- so you

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1 would -- you know what a thousand dollars of cash looks
2 like.

3 Did you ever see Ben with what appeared to
4 be a thousand dollars or multiple thousands of dollars
5 of cash in your apartment?

6 MR. TEPFER: Objection to form.

7 Go ahead.

8 BY THE WITNESS:

9 A. I couldn't -- I can't answer that.

10 BY MS. OLIVIER:

11 Q. Why not?

12 A. Are we talking about singles, fives, tens?
13 I -- I don't know how -- what is the quantity or the
14 size of -- if it's just all hundreds. But I didn't look
15 at his cash, so I can't answer that.

16 Q. Well, you would -- would you agree with me
17 that physically, even if we're talking about hundreds of
18 dollars, if you have a -- if you have multiple bills,
19 that is a physical size of cash, correct?

20 MR. TEPFER: Objection to form.

21 BY THE WITNESS:

22 A. Incorrect for me.

23 BY MS. OLIVIER:

24 Q. Okay.

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1 **A.** It would be incorrect for me personally.

2 **Q.** Okay. Why would it be incorrect?

3 **A.** Because it's many different forms of bills. I
4 have seen \$2 bills, a dollar Bill, a solid \$100 bill.
5 So I would say it would be incorrect to me.

6 **Q.** Okay. And I'm seeing I'm asking the question
7 poorly. So let me try and maybe --

8 **A.** Okay.

9 **Q.** Regardless of the actual denomination, whether
10 it's \$1, \$2, \$10, 100, a bill is a bill if we're talking
11 about currency. Would you agree with me there?

12 **A.** Yes.

13 **Q.** Okay. And they're all the same size, correct?

14 **A.** Yes. Green, yes.

15 **Q.** Okay. So when you stack them on one another,
16 they physically take up space, correct?

17 **A.** Yes.

18 **Q.** Okay. And, obviously, if you have a --
19 1,000 -- if you have a stack of \$1,000 made up of \$100
20 bills, that's going to be smaller than a stack of \$1,000
21 with \$1 bills, right?

22 **A.** Correct.

23 **Q.** What I'm asking is, knowing that at some point
24 in your lifetime you've seen what it looks like,

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1 regardless of the denomination of what \$1,000 cash can
2 look like, have you seen an amount or a size or stack of
3 bills that was that size or greater stored in your
4 apartment?

5 MR. TEPFER: Objection to form.

6 BY THE WITNESS:

7 A. So, again, I'm going to stick with my same
8 answer. You cannot tell because between those stacks,
9 are they just the same hundred dollars or is it a five
10 stuck in there or where I'm going to assume that it's a
11 hundred dollar bill so it can be shorter, or is it
12 like -- no, I don't know. I cannot answer. I did not
13 count his money to say, oh, you have a whole \$5. I -- I
14 did not.

15 BY MS. OLIVIER:

16 Q. Did you ever see stacks of bills of unknown
17 denominations of cash in your apartment that belonged to
18 Ben and were not from you?

19 A. Yes.

20 Q. How large were these stacks physically?

21 MR. TEPFER: Objection to form.

22 Go ahead.

23 BY THE WITNESS:

24 A. Not -- not large.

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1 BY MS. OLIVIER:

2 Q. If you can use inches, even using, like, a
3 sheet of paper is 8 by -- 8 and a half by 11.

4 A. Well, we -- I would say not large because
5 this is -- I mean, we gambled and played cards, so it
6 was like a lot of money because his family loved to play
7 cards and gamble. So it was coming and going because
8 it's a group of people sitting gambling, so...

9 I don't -- I can't answer that question.

10 Q. So is it your testimony that when you would
11 see large stacks of cash, it was related to the
12 gambling, not to Ben's drug dealing?

13 MR. TEPFER: Objection to form,
14 argumentative --

15 BY THE WITNESS:

16 A. And I'm not saying --

17 MR. TEPFER: Let me finish.

18 THE WITNESS: I'm sorry.

19 MR. TEPFER: -- and mischaracterizes.

20 But go ahead.

21 BY THE WITNESS:

22 A. I'm not saying large stacks of cash.
23 That's -- we still have a discrepancy with that.

24 BY MS. OLIVIER:

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1 **Q.** Okay. When you saw a lot of money, are -- is
2 it your testimony that the times that you saw a lot of
3 money, which is what you directly said, was in the
4 context of people coming over gambling versus proceeds
5 from Ben's drug dealing?

6 MR. TEPFER: Objection -- objection, form,
7 argumentative, mischaracterizes the testimony.

8 Go ahead.

9 BY THE WITNESS:

10 **A.** No. And that's not what I said.

11 BY MS. OLIVIER:

12 **Q.** Okay. Please correct me where I'm wrong.

13 MR. TEPFER: Objection, form.

14 BY THE WITNESS:

15 **A.** I said that -- I didn't say anything about
16 drug money. I said family and friends came over and --
17 I actually didn't say that. But family and friends
18 would come over and play cards, and they would tran- --
19 transfer money from gambling at the table.

20 So some of them, including Ben, he would
21 have his money folded up. So it would come and go. It
22 depends on if he's winning and if he's losing. And at
23 that time -- at any time I have not counted his money
24 because I had no reason to.

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1 BY MS. OLIVIER:

2 Q. Outside of when people were coming over
3 gambling -- and I understand your description of that --
4 did you ever see similarly-sized stacks of cash that
5 were from the proceeds of Ben's narcotics activity in
6 Apartment 206?

7 MR. TEPFER: Objection, calls for speculation
8 and argumentative, form.

9 BY THE WITNESS:

10 A. I don't know anything about proceeds from --
11 from the drug money or drugs.

12 BY MS. OLIVIER:

13 Q. I know you've testified multiple times at this
14 point today that you cannot tell me or state for the
15 record when you first realized that Ben was a drug
16 dealer.

17 What is your understanding of Ben being a
18 drug dealer?

19 MR. TEPFER: Objection to form, argumentative,
20 mischaracterizes the testimony.

21 You can answer, if you understand the
22 question.

23 BY THE WITNESS:

24 A. What is my opinion of a drug dealer?

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1 BY MS. OLIVIER:

2 Q. No. I just want you to focus solely on --
3 well, let me ask you this. Would you agree that Ben was
4 and is -- was just convicted of drug dealing and that he
5 was a drug dealer?

6 MR. TEPFER: Objection, mischaracterizes the
7 record, compound question, argumentative, form.

8 BY MS. OLIVIER:

9 Q. I know. That was a bad question. I'll clean
10 it up.

11 When you and Ben were living in the
12 Ida B. Wells Homes, do you admit that he was a drug
13 dealer at some point?

14 A. Yes.

15 Q. Okay. My question is very specific. I know
16 that you do not know when you discovered that he was
17 dealing drugs. But when you did, what was your
18 understanding of what that meant?

19 A. That narcotics was in his possession, and he
20 had transactions as far as giving people narcotics.

21 Q. Where did he keep the drugs that he was
22 selling?

23 MR. TEPFER: Objection to form.

24 Go ahead.

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1 BY THE WITNESS:

2 A. I don't know.

3 BY MS. OLIVIER:

4 Q. How did you find out that he was a drug
5 dealer?

6 A. I think from -- from Watts, probably. I would
7 say it would mainly stem from that.

8 Q. Okay. So when did you first encounter or
9 interact with Sergeant Watts?

10 A. The first time that I physically seen him
11 encounter would be on Mother's Day.

12 Q. And that was May 9th, 2004?

13 A. I believe so.

14 Q. Okay. From -- using May 9th, 2004, as our
15 starting point, because that's the first time you saw
16 him, at what point during there did he indicate to you
17 that Ben was a drug dealer or did you reach that
18 conclusion?

19 A. I kind of reached that conclusion. It's my
20 opinion.

21 Q. Well, isn't it a fact that he was a drug
22 dealer?

23 MR. TEPFER: Objection, argumentative.

24 BY THE WITNESS:

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1 **A.** Well, I would say for my relationship with Ben
2 personally, I don't see him -- and there's no
3 disrespect. It's me personally. I don't see him as --
4 as that. I see him as my partner, mate, you know, my
5 kids' father. But I do understand, you know, the
6 severity and where we are, you know, what's going on.
7 But I don't see that in him, in my perspective of Ben.

8 BY MS. OLIVIER:

9 **Q.** So I'm not necessarily asking you to judge
10 him. We can look at it like a job description. His job
11 was drug dealing. So would you agree that that's a
12 fact, that he was a drug dealer?

13 MR. TEPFER: Objection to form.

14 BY THE WITNESS:

15 **A.** I would say no, in my opinion. I would say
16 no.

17 BY MS. OLIVIER:

18 **Q.** Okay. Because you don't like the stigma of
19 what that brings with it? Or why do you disagree?

20 **A.** No. I just disagree because of my knowledge
21 of Ben personally. So that's -- that's the only -- only
22 reason. My own personal.

23 **Q.** But you would agree that someone that
24 possesses and sells drugs for money is a drug dealer?

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1 MR. TEPFER: Objection to form.

2 BY THE WITNESS:

3 A. Yes.

4 BY MS. OLIVIER:

5 Q. Okay. What about your interactions with Watts
6 led you to the conclusion that your then-husband was
7 dealing drugs?

8 A. That he was up all night and he lost his money
9 gambling and he was broke.

10 Q. So let's just back up a little bit. So is --
11 who said that statement?

12 A. Ronald Watts.

13 Q. Okay. Is this on Mother's Day, May 9th, 2004?

14 A. I believe it was.

15 Q. What about that statement made you think that
16 your husband was a drug dealer?

17 A. From my understanding, my opinion, Watts did
18 not really communicate with or make verbal statements or
19 outbursts or whatever you may want to call it out loud
20 about lack of income. We -- we were the only ones that
21 I noticed that were outside. So why are you yelling at
22 us that you don't have any money? And who cares that
23 you lost your money and you drunk and all that? I
24 didn't know he lived in the neighborhood. But that's

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1 not my business. And that's how I came to my
2 conclusion, my assumptions, yes.

3 Q. So there are a couple of things I want to
4 unpack about that. I'd asked you before when your first
5 encounter with Watts was. And did you know who he was
6 prior to May 9th, 2004?

7 A. No, I don't believe so. I believe that was
8 the first time that I actually had a -- I heard of the
9 name. But that was the first time that I have put that
10 name to the face. That's what I -- I can remember.

11 Q. Was he with anyone on May 9, 2004, when he
12 made these statements?

13 A. Yes. I saw another officer, which is -- which
14 I learned to know, which it was A.J., coming around the
15 apartment building behind him. Those were the only two.

16 Q. So what time was this, when this took place?

17 A. In the morning.

18 Q. Do you know what time in the morning?

19 A. I know it was early. Because we usually go
20 out. We -- we were going to get something to eat, and
21 it was a Sunday. So we were trying to beat the Sunday
22 rush and Mother's Day rush. So it was, I would say,
23 between 7:00, no later than 9:00. But between 7:00 and
24 8:00 maybe. But it was early.

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1 Q. Who were you with at the time?

2 A. Ben, Jr., Sr., Gerard Baker, and Deon Baker.

3 Q. Where were the five of you coming from?

4 A. Out the building of 527.

5 Q. Were you all coming out of the building
6 together?

7 A. The boys kind of ran ahead of us to the
8 vehicle.

9 Q. Had you all exited your apartment, 206,
10 together prior to exiting the building?

11 A. I don't recall that.

12 Q. Besides him calling out to you, did you
13 recognize Watts?

14 A. No.

15 Q. Did you recognize the other officer behind
16 him, A.J.?

17 A. No.

18 Q. Did you know that either of them were police
19 officers at that time?

20 A. I kind of assumed that they were.

21 Q. Why did you assume?

22 A. The way that they carry theirselves, their
23 demeanor. I have been around police officers growing
24 up, and especially as Security Professionals, they have

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1 police officers that worked side jobs for them, and I
2 spent a nice amount of -- a decent amount of time to
3 kind of know in my opinion.

4 Q. Prior to Mother's Day 2004, had you seen
5 Chicago police officers in plainclothes around the
6 Ida B. Wells Homes and the 527 building specifically?

7 A. Yes. Yes.

8 Q. And what was the typical attire that these
9 officers would wear?

10 A. Jeans, gym shoes, a T-shirt, sometimes a
11 long-sleeved T-shirt or a jersey, like a sports jersey.

12 Q. Do you recall them ever wearing tactical
13 vests?

14 A. No.

15 Q. Okay. Were these officers armed?

16 A. I have seen them armed, but not as much. It
17 was usually, in my opinion -- in my assumption, it was
18 kind of covered from the shirts.

19 Q. Could you see if they -- could you tell if
20 these plainclothes officers were wearing bulletproof
21 vests or anything like that underneath their clothing?

22 A. I would say no, I could not tell if they were
23 or were not under their clothing.

24 Q. When they were armed, was -- would there --

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1 would you be able to tell that because they had their
2 service weapon on their belt with, like, their other --
3 is it for -- on their utility belt, for lack of a better
4 term?

5 MR. TEPFER: Are we still talking about the
6 time period before Mother's Day 2004?

7 MS. OLIVIER: Yes. We're talking generally
8 about the time period before 2004 in terms of just
9 her generally seeing plainclothes officers at
10 Ida B. Wells Homes.

11 MR. TEPFER: Thank you.

12 BY THE WITNESS:

13 A. Can you repeat your question, please?

14 BY MS. OLIVIER:

15 Q. Sure.

16 I was just asking if -- was one of the
17 reasons why you were able to tell that they were armed
18 because you could physically see their weapon holstered
19 and they may be wearing a utility belt of some sort with
20 other gear attached to that belt?

21 A. I really didn't see a utility belt.

22 Q. Okay.

23 A. It depends on the officer and the shirt that's
24 covering the service weapon. Because if their shirt is

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1 not as large, you could see the imprint of the gun on
2 their body. If you just watch people's body movement
3 and their hands, you can -- I'm not going to say you
4 can. But you can speculate that it's something on their
5 waist, especially if they don't have a jacket on.

6 Q. And so I'm clear, A.J., are you referring to
7 Alvin Jones?

8 A. Yes.

9 Q. And A.J. is a nickname?

10 A. Yes.

11 Q. All right. You had not seen him either prior
12 to Mother's Day 2004, correct?

13 A. If I did -- if I did, it was -- because
14 nothing was said. There was no interactions or me
15 hearing anything as far as them speaking. So I -- I --
16 I would say no.

17 Q. Was it easy for you to spot plainclothes
18 officers at the Ida B. Wells Homes in and around the
19 527 building?

20 A. Yeah.

21 Q. So on Mother's Day 2004, did it appear to you
22 that Watts and A.J. were working?

23 A. Honestly, I would say no, only because of his
24 statement, of Watts's statement, which was he was drunk.

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1 So I know by him being a decorated sworn in officer, he
2 was not drunk on duty.

3 Q. Do you know why he and A.J. would have been at
4 the -- in front of the 527 building on their day off on
5 Mother's Day?

6 A. I didn't --

7 MR. TEPFER: Objection, calls for speculation.

8 Go ahead.

9 BY THE WITNESS:

10 A. I didn't say they were in front of 527.

11 BY MS. OLIVIER:

12 Q. Okay. Do you know why they would have been at
13 the Extensions on Mother's Day 2004?

14 MR. TEPFER: Same objection.

15 BY THE WITNESS:

16 A. Watts said that he was up gambling. So I
17 guess he was up gambling. He lost his money. So I'm
18 assuming gambling.

19 BY MS. OLIVIER:

20 Q. Did it strike you as odd when you saw these
21 two police officers and they made those statements?

22 A. I would say yes when they made the
23 statements -- when he made the statement.

24 Q. Where was Al when Watts made this statement?

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1 **A.** Directly behind him, maybe, like, 2 feet
2 behind him.

3 **Q.** Did he say anything?

4 **A.** No.

5 **Q.** Did either of them appear visibly intoxicated
6 to you?

7 **A.** I cannot see -- I would say no, I couldn't
8 tell, no.

9 **Q.** Have you seen someone visibly drunk before?

10 **A.** I know that -- yes. I'm going to answer that
11 question yes.

12 **Q.** Okay. So -- and the reason I asked is, so you
13 would know -- you know what it looked like if someone --
14 when I say the term "visibly intoxicated," you know what
15 that means, correct?

16 **A.** Yes. But I also know that it means you can be
17 drunk depending on your body weight and your size, so --
18 and you can carry it differently because of the weight,
19 but yes.

20 **Q.** As an aside, did you ever see individuals
21 visibly intoxicated or incapacitated, drunk in or around
22 the 527 building when you lived there from '97 to 2006?

23 **A.** Yes.

24 **Q.** How often would you say that happened?

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1 **A.** My neighbor was an alcoholic. Me assuming. I
2 don't know if he actually is. But he indulged in a lot
3 of alcohol, where he'd get help going to his apartment.

4 **Q.** Do you remember his name?

5 **A.** Chili.

6 **Q.** Oh. This is Chili that you referenced before?

7 **A.** (No audible response.)

8 **Q.** Besides Chili, were there other individuals
9 that you did not know that appeared to be visibly --
10 visibly intoxicated or incapacitated?

11 **A.** Yes.

12 **Q.** And where would you see these people?

13 **A.** This person?

14 **Q.** Was it more than -- you tell me if it was more
15 than one individual.

16 **A.** Well, Chili -- it would be more than one.

17 **Q.** Okay. Did you see people visibly high
18 around -- in and around the 527 building when you lived
19 there?

20 **A.** Yes.

21 **Q.** How often?

22 **A.** Often.

23 **Q.** Would it be a daily basis?

24 **A.** Out of seven days, I would say at least five

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1 days out of the seven, and that's from me coming in and
2 going out.

3 Q. Did you see people coming in and going out of
4 527, ostensibly to buy drugs?

5 MR. TEPFER: Objection, calls for speculation.

6 BY THE WITNESS:

7 A. I can't say what the people were coming in and
8 coming out for.

9 BY MS. OLIVIER:

10 Q. Did you see drug deals take place in the
11 stairwells at 527?

12 A. Yes.

13 Q. How often?

14 A. I guess it would be, like -- I wouldn't say
15 often, but I have seen it. It depends on how often
16 because I worked. So I wasn't -- but yes.

17 Q. Well, since you lived there, you would know
18 best. But does it ring true to you that drug dealers
19 would start selling drugs as early as 6:00 a.m. and
20 continue selling drugs all day until 9:00 p.m.?

21 MR. TEPFER: Objection to form.

22 BY THE WITNESS:

23 A. I don't know about 6:00 a.m.

24 At 9:00 p.m.? At night?

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1 BY MS. OLIVIER:

2 Q. Yes. Or later?

3 A. No. I'm not aware of that. No.

4 Q. Did you know when -- when you would observe
5 these drug deals in the stairwells, did you know the
6 individuals that were handing out the drugs to the
7 person buying them?

8 A. I believe, like, some of the people were maybe
9 squatters or lived with someone in the building, but
10 that's -- that's all.

11 Q. The drug dealers in 527 were squatters?

12 A. That wasn't your question.

13 Q. I asked if you recognized who the drug dealers
14 that were dealing drugs --

15 A. Handing out?

16 Q. -- were. Yes.

17 And -- okay. So is there a difference --
18 so is there a difference to you between the drug dealers
19 in 527 and the individuals who handed out the drugs in
20 the stairwells?

21 MR. TEPFER: Objection, form.

22 Go ahead.

23 BY THE WITNESS:

24 A. Yes.

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1 BY MS. OLIVIER:

2 Q. Okay. Do you know who the drug dealers were
3 in 527?

4 MR. TEPFER: Objection, form.

5 Go ahead.

6 BY THE WITNESS:

7 A. No.

8 BY MS. OLIVIER:

9 Q. You're aware that your husband has been
10 accused and -- of being one of the drug dealers in 527,
11 correct?

12 A. Correct.

13 Q. Okay. You disagree with that, though?

14 A. That was that conversation that you and I just
15 had, like, a little earlier, maybe, like, 15 or
16 20 minutes ago, and I told you that in my eyes, me
17 personally don't see him as that because of my personal
18 long-term relationship with him. But I do understand
19 his convictions and what he pled guilty to and what he
20 has stated that he has done. So I am -- I am aware of
21 that. But me personally calling him a drug dealer, no.
22 But in everyone else eyes, yes, he would be considered
23 one.

24 Q. Okay. What were the names of other drug

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1 dealers in the 527 building that you would be
2 comfortable calling drug dealers?

3 MR. TEPFER: Objection, mischaracterizes the
4 testimony, form.

5 Go ahead.

6 BY THE WITNESS:

7 A. I don't know. I don't know their -- I don't
8 know. I don't know their names. I don't know. If I
9 saw a picture, then I can point a picture out of me
10 assuming that they're drug dealers, but I don't know.

11 BY MS. OLIVIER:

12 Q. Going back to Mother's Day of 2004, how far
13 away was Watts from you -- or were you and Ben together
14 next to each other when Watts made that statement?

15 A. Yes.

16 Q. How far away was Watts from you when he made
17 that statement?

18 A. Maybe 15 to 20 feet away, give or take.

19 Q. And, spatially, was he in front of you, to
20 your right, your left, behind you?

21 A. The right.

22 Q. Once he said that, did you say anything to
23 Watts in response?

24 A. No.

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1 **Q.** Did your husband say anything to Watts in
2 response?

3 **A.** No.

4 **Q.** What did you both do after Watts made that
5 statement?

6 **A.** Continued to walk.

7 **Q.** Where were you walking to?

8 **A.** To our vehicle.

9 **Q.** During this time, in 2004, what -- how many
10 vehicles did your household have?

11 **A.** I can't recall.

12 **Q.** To make it more broad, from when you began
13 living at Apartment 206 up in -- in 1997 up to 2006, how
14 many vehicles did you have in the household -- attached
15 to your household?

16 MR. TEPFER: During the entire time period,
17 you're asking?

18 MS. OLIVIER: Yes, if she can answer.

19 BY THE WITNESS:

20 **A.** Maybe one.

21 BY MS. OLIVIER:

22 **Q.** One vehicle the entire time from 1997 to 2006?

23 **A.** No. We had -- we had vehicles, but at one
24 time, I -- I don't remember, but we had some vehicles.

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1 I would say maybe -- let me see. Maybe, like, four,
2 four or five vehicles during that time span.

3 Q. One of the -- well -- so in 2004, you did
4 not -- in 2004 to 2005, between you and Ben Baker, you
5 did not have three vehicles?

6 A. I don't recall.

7 Q. Do you recall having a burgundy Chevy Impala
8 in this time period of 2004 and 2005?

9 A. I know we had one. I don't remember the time
10 frame. Ben had one, yes, in his name.

11 Q. Do you know when he purchased that vehicle?

12 A. No.

13 Q. How long did you have that vehicle for?

14 A. That was Ben's vehicle.

15 Q. How long did Ben have that vehicle for?

16 A. I think maybe a year or under a year. No, no.
17 He had that vehicle -- we had that vehicle for -- since
18 his arrest. He had an arrest after because I actually
19 sold it. So he had that vehicle for a while.

20 Q. When you say his arrest, which arrest?

21 A. I don't remember. I just know that I got rid
22 of the vehicle when I was -- I just got rid of the
23 vehicle.

24 Q. Do you know how he purchased the vehicle?

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1 **A.** No. I was not with him.

2 **Q.** Do you know where he purchased it from?

3 **A.** No.

4 **Q.** Was it new or used?

5 **A.** Used.

6 **Q.** How would you describe the condition?

7 **A.** Okay and loud.

8 MR. TEPFER: What did you say?

9 THE WITNESS: How would you describe the
10 condition? And I said okay and loud.

11 MR. TEPFER: I'm sorry.

12 BY MS. OLIVIER:

13 **Q.** Do you know where he got the money to purchase
14 the vehicle?

15 **A.** No.

16 **Q.** Do you know if he purchased it outright or if
17 it was a lease situation?

18 **A.** I would assume it was outright because we
19 never -- I would assume it would be outright.

20 **Q.** You don't recall him having to make any sort
21 of car payments or anything like that?

22 **A.** Correct.

23 **Q.** Do you know how much cash it cost to purchase
24 a Chevy Impala?

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1 MR. TEPFER: Objection, calls -- form.

2 BY THE WITNESS:

3 A. No.

4 BY MS. OLIVIER:

5 Q. Have you ever purchased a vehicle in cash?

6 A. I have -- yes.

7 Q. Do you recall when that was?

8 A. That was for my -- for the Cadillac, that
9 black Cadillac.

10 Q. That you currently have?

11 A. No. The first one.

12 Q. In 2017?

13 A. No. It was before 2017.

14 Q. Was Ben involved in --

15 A. Oh, no, maybe -- maybe not. Maybe it is. But
16 no, not the one that we have -- currently have, no.

17 Q. Was Ben involved in that purchase?

18 A. No.

19 Q. Was this purchase -- was that purchase during
20 the time period when he was incarcerated?

21 A. No. When he was out.

22 Q. Okay. Was this when you were living at the
23 Wells?

24 A. No.

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1 **A.** Probably around that time. But I did own the
2 vehicle, yes.

3 **Q.** Did you also own any GMC truck, and using the
4 term "truck" for SUV?

5 **A.** Yes.

6 **Q.** Was that also in 2004, 2005?

7 **A.** Yes.

8 **Q.** Do you recall owning three vehicles all -- or
9 having three vehicles attributed to your household all
10 at the same -- at any period of time?

11 **A.** No. I don't recall.

12 **Q.** Okay. Whose vehicle was the gray Dodge
13 Intrepid?

14 **A.** Mine.

15 **Q.** When was that vehicle purchased?

16 **A.** I don't remember.

17 **Q.** Did you purchase it new or used?

18 **A.** Used.

19 **Q.** Do you recall where you purchased it from?

20 **A.** Somewhere on Western, but not -- I don't know
21 the exact -- I don't know the exact name of the car
22 company.

23 **Q.** Did you say Western?

24 **A.** Western.

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1 Q. Western?

2 A. Yes, ma'am.

3 Q. How did you purchase the vehicle, with cash, a
4 payment plan, lease?

5 A. Payment plan. I had a car note.

6 Q. Did you have to put money down?

7 A. I can't remember. I think I -- I can't
8 remember. I'm not going to assume.

9 Q. Do you know if you were working at the time
10 when you purchased the vehicle?

11 A. Yes. Yes.

12 Q. Did Ben assist you financially with the
13 purchase of that vehicle?

14 A. No.

15 Q. With respect to the GMC SUV, what color was
16 that?

17 A. Beige. Tan, beige.

18 Q. Do you know when you purchased that vehicle?

19 A. No. Right -- I believe it was after the
20 Dodge -- shortly after the Dodge Intrepid.

21 Q. Who purchased that vehicle?

22 A. Myself.

23 Q. Was it new or used?

24 A. Used.

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1 Q. Do you know where you purchased it from?

2 A. Also Western.

3 Q. Do you know how much the gray Dodge Intrepid
4 cost in full?

5 A. No. I don't remember.

6 Q. Do you know how much the GMC cost in full?

7 A. No.

8 Q. Do you recall how you paid for the GMC?

9 A. Yes. Once I sold my Intrepid, I used that
10 proceeds to put towards the GMC.

11 Q. How much did you sell the Intrepid for?

12 A. Something like maybe 3600 or 4,000, but 36-,
13 me estimating, hundred.

14 Q. Did you make a profit off of selling your car?

15 MR. TEPFER: Objection to form.

16 But go ahead.

17 BY THE WITNESS:

18 A. I don't -- I don't know.

19 BY MS. OLIVIER:

20 Q. With respect to the GMC, you -- I'm sorry. Do
21 you know how much it cost?

22 A. No. I don't remember.

23 Q. Did you buy it outright, or did you have to
24 set up a payment plan?

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1 **A.** I had purchased it outright.

2 **Q.** Do you know if you paid in cash or cashier's
3 check?

4 **A.** I left -- I left some cash there at the
5 dealership, and I had to come back on my pay -- I came
6 back and paid the rest in cash. In cash.

7 **Q.** Okay. So two cash -- two separate cash
8 payments?

9 **A.** Yes.

10 **Q.** You sold your Dodge Intrepid and put the 3600
11 or \$4,000 towards the GMC. So did that mean that the
12 GMC was more than 3600 or \$4,000?

13 **A.** Yes.

14 **Q.** But once you made those two separate cash
15 payments, it was paid for in full?

16 **A.** Yes.

17 **Q.** Did Ben assist you with the purchase of the
18 GMC?

19 **A.** No.

20 **Q.** Going back to Mother's Day of 2004, you stated
21 neither yourself nor Ben said anything to Watts after he
22 made that statement about being drunk to you. Where --
23 and you proceeded to your vehicle. What happened next?

24 **A.** As we were talking to our -- the vehicle, I

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1 asked Ben, who was that.

2 Q. What did Ben respond?

3 A. No -- that's nobody. That's Watts. I think
4 he said "ass," but he said Watts and A.J.

5 Q. Acknowledging that he had seen A.J. too?

6 A. Ma'am?

7 Q. He said -- that was Watts and A.J.
8 acknowledging he saw A.J. was there as well?

9 A. Yes.

10 Q. After he said that response to you, did you
11 say anything back to him?

12 A. No.

13 Q. Based off of Ben's response, did that indicate
14 anything to you about who Watts was?

15 MR. TEPFER: Objection to form.

16 BY THE WITNESS:

17 A. Can you repeat that, what -- what you asked?

18 BY MS. OLIVIER:

19 Q. Knowing Ben and his response, saying, "Oh,
20 it's just Watts and A.J.," did that response indicate
21 anything to you?

22 MR. TEPFER: Objection, mischaracterizes the
23 testimony.

24 Go ahead.

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1 BY THE WITNESS:

2 A. No.

3 BY MS. OLIVIER:

4 Q. Was there any further discussion about this
5 interaction?

6 A. No.

7 Q. Based off of Ben's response, did it seem to
8 you that he knew who Watts and A.J. were?

9 MR. TEPFER: Objection, call -- well, strike
10 it.

11 Go ahead.

12 BY THE WITNESS:

13 A. I can assume by him saying their names.

14 BY MS. OLIVIER:

15 Q. Do you know how many times Ben had interacted
16 with Watts or A.J. up and to that point?

17 A. No.

18 Q. Do you know if Ben had ever paid off either of
19 those individuals prior to that date?

20 A. No.

21 Q. Did Ben tell you that he'd ever given money to
22 either Watts or A.J. on Mother's Day or prior to that
23 date?

24 A. No.

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1 **Q.** You've indicated that you were aware that
2 there were narcotics sales taking place in the -- your
3 building, the 527 building.

4 Were you aware of narcotics sales taking
5 place in other buildings in the Extensions?

6 **A.** I assume.

7 **Q.** Were you aware of narcotics sales taking place
8 in the 574 building?

9 **A.** I assumed.

10 **Q.** Did you know anyone that lived in that
11 building?

12 **A.** No.

13 **Q.** Did you ever hear any rumors in the Wells
14 about rogue or dirty cops?

15 **A.** About who?

16 **Q.** About dirty cops?

17 **A.** Can you rephrase your question?

18 **Q.** Sure.

19 Prior to Mother's Day of 2004, had you
20 ever heard rumors in the Wells community that there were
21 dirty cops patrolling and present in the Wells
22 community?

23 **A.** As I was -- not me personally just sitting
24 there, holding conversations. But as I was passing by

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1 or something like that, I would hear, like, comments
2 about Watts, but I didn't know who he was prior to the
3 Mother's Day.

4 Q. When was the first time you recall hearing a
5 comment about Watts?

6 A. I'm not for sure.

7 Q. What were some of those comments?

8 A. Watts says -- Watts's ass is dirty. I
9 heard -- overheard about someone paying him some money.
10 Really, that -- it was just, like, little bits and
11 pieces, not hearing a whole conversation or what led up
12 to that.

13 Q. Did you ever hear the names of any other
14 Chicago police officers in these overheard conversations
15 prior to Mother's Day 2004?

16 A. I can remember vaguely like a comment,
17 "Mohammed is going to do what Watts tell him to do.
18 He's not going to say shit or do shit" or something to
19 that effect.

20 Q. Did you ever hear any other names of officers?

21 A. I heard of names, only a few, but not someone
22 referencing them to any corruption or they're a good guy
23 or anything to that effect. I just heard the name.

24 Q. So just so I'm clear, so you've heard -- you

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1 heard the other names of other officers being
2 referenced, but not in the context -- you're
3 differentiating it from the context of Watts and
4 Mohammed. The other times you heard these other
5 officers' names wasn't being discussed in the context of
6 corruption or misconduct?

7 **A.** Or being a good officer, either/or, negative
8 or positive.

9 **Q.** Okay.

10 **A.** Yes.

11 **Q.** Just hearing names in passing, not associated
12 with any specific behavior --

13 **A.** Correct. Yes.

14 **Q.** -- or --

15 (Simultaneous crosstalk.)

16 BY MS. OLIVIER:

17 **Q.** Prior to 2004, had you ever personally
18 observed what you perceived to be misconduct by the
19 police against civilians?

20 **A.** Prior to Mother's Day?

21 **Q.** Correct.

22 **A.** No, not that I recall.

23 **Q.** So you had never seen -- you'd never seen cops
24 stealing money from civilians or planting drugs or

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1 anything like that?

2 **A.** No.

3 **Q.** Okay. When was the next time that you saw
4 Watts?

5 **A.** I seen him on many occasions, but I don't
6 have, like, the -- the year and the dates and the
7 months. But I seen him after Mother's Day more often
8 because I really never saw him. And if I did, I didn't
9 know that was him, in passing.

10 **Q.** Going back to the 527 building, were you
11 familiar or aware of how the drug operations in the
12 building were structured?

13 **A.** No.

14 **Q.** You had mentioned before that in your mind,
15 there were -- or to your knowledge, there were drug
16 dealers which were different than the individuals
17 passing out the drugs in the hallways?

18 **A.** Correct.

19 **Q.** Do you know how -- where the drug dealers in
20 527 got the drugs that they would then pass to the
21 people that -- in the stairwells?

22 **A.** No.

23 **Q.** Do you know where drugs were stored at 527?

24 **A.** No.

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1 **Q.** Do you know the type of drugs that were sold
2 in 527?

3 **A.** Just probably speculations of me hearing
4 people saying that their blow is better or something
5 like that as they entering 527.

6 **Q.** So I had asked you earlier if you -- when you
7 first moved in in 1997, if you recalled hearing people
8 yelling out blows and things like that.

9 When is your memory of -- your first
10 memory of hearing people call out blows and other names
11 of drugs?

12 **A.** I don't recall. It wasn't when I moved in.
13 And I don't --

14 **Q.** And I'm not talking about the actual day.
15 Was it within the first week of moving in
16 you heard --

17 **A.** No. It probably was some years later, me
18 assuming, but no. It was really nice.

19 **Q.** So was there a shift from when you first moved
20 in in 1997 prior to you leaving in 2006?

21 **A.** Yes.

22 **Q.** When did that shift take place?

23 **A.** That would be the -- I cannot recall.

24 **Q.** As of 2004, had you -- were you aware of the

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1 narcotics transactions that were taking place in the 527
2 building?

3 MR. TEPFER: Objection to form.

4 BY THE WITNESS:

5 A. I would -- I would say no.

6 BY MS. OLIVIER:

7 Q. Once you had this encounter with Watts on
8 Mother's Day 2004 and you reached the conclusion that
9 Ben was possessing and selling narcotics, did you have a
10 conversation with him about what -- the conclusion you'd
11 reached?

12 A. I'm sorry. Can you repeat that one more time?

13 Q. Sure.

14 You stated that on Mother's Day 2004,
15 after you saw Watts engage with Ben, by making that
16 statement, that you reached the conclusion that Ben was
17 possessing and selling narcotics.

18 And my question is, did you have a
19 conversation about that conclusion you reached?

20 A. I would say all of that was incorrect. I said
21 that Ben and myself and our family was walking towards
22 the car, and Watts and A.J. came from around 527. And
23 as they were walking in our direction and as we
24 continued to walk, Watts made the comment that he was

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1 up, lost his money gambling, drinking. It's Mother's
2 Day. And something else he had said. I forgot.

3 And I assumed. I didn't say him and Ben
4 had a conversation. I assumed that it was directed
5 towards us because we were the only one that I noticed
6 that was outside at that time early in the morning. As
7 we continued to walk to our vehicle, I asked Ben, who
8 was that? He said nobody. Watts's ass and A.J. And
9 that was the end of that, that conversation. But I
10 didn't say that they had a conversation or interaction
11 or he was directly talking to Ben.

12 Q. Sure.

13 So -- and I definitely don't want to
14 mischaracterize your testimony.

15 A. Thank you.

16 Q. After this -- after this interaction,
17 though -- and, again, correct me if I'm
18 mischaracterizing what was going on.

19 A. Okay.

20 Q. After this interaction between yourself and
21 Ben, Watts and A.J., you reached a conclusion based off
22 of Watts speaking and directing his comments towards the
23 two of you that Ben was possessing and selling
24 narcotics?

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1 **A.** It wasn't a -- it wasn't a conclusion. I
2 didn't say conclusion. Because when we say that word,
3 for me, in my opinion, that means final, like I had --

4 **Q.** Okay.

5 **A.** -- did, you know, my investigation and
6 homework and said, oh, this is what it is. I assumed,
7 because I didn't see a reason for anyone, for decorative
8 officers, right, to say anything about their finances to
9 two individuals that don't have any relationship with
10 you.

11 **Q.** But regardless, you reached that -- and I'm
12 sorry for calling it "conclusion." You reached that
13 assumption.

14 **A.** Assumption, yes, ma'am.

15 **Q.** You reached that assumption.

16 Did you discuss that assumption with your
17 then-husband?

18 **A.** No.

19 **Q.** Why not?

20 **A.** Just questions that I didn't ask or engaged
21 in. I just went -- as long as he was okay and my boys
22 were okay and I was okay, that's all that really
23 mattered. What he -- what Ben did and didn't do,
24 honestly, I didn't think too much of it because I just

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1 didn't. As long as we were okay together and as a unit,
2 that was my only concern. Other than that, that was
3 outside.

4 **Q.** After Mother's Day 2004, when you reached that
5 assumption, did you look at the cash that Ben would
6 contribute to the family expenses and to your home in a
7 different way?

8 **A.** No. No.

9 **Q.** Did you, following your assumption, assume
10 that the money that Ben gave to you and the --
11 contributed to the family was from drug sales?

12 **A.** No. I never -- I didn't think about it. If
13 it was money given to me, I didn't think about it --

14 **Q.** Where did you --

15 **A.** -- where it came from.

16 **Q.** Where did you think the money was coming from?

17 **A.** Well, again, it goes back to the other
18 question. It was not a concern of mine where it came
19 from. I continued to work and had the income of my own.
20 If it was a hundred dollars or a million dollar
21 paycheck, I made sure that we maintained with my
22 employment. So if Ben is this drug dealer or whatever
23 it is, I continued to work and brought income in the
24 home.

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1 **Q.** Yes. And I completely understand and respect
2 the independence that you've maintained this whole time.

3 However, with respect to -- in terms of
4 your financial stability, with respect to 2004, though,
5 you had noted to me earlier that -- when I'd asked when
6 he started -- he finally started contributing
7 financially since you obviously were the breadwinner for
8 the vast majority of your relationship, I'm just
9 wondering if 2004 seems like it's also the year that
10 you're realizing that he was engaging in narcotics
11 sales.

12 So did you question the source of the
13 finances he was contributing to the relationship at that
14 time?

15 MR. TEPFER: Objection, asked and answered and
16 form.

17 BY THE WITNESS:

18 **A.** No. And -- well, I just didn't.

19 BY MS. OLIVIER:

20 **Q.** Ben was shot in 2004, correct?

21 **A.** Okay.

22 **Q.** I'm asking, is that -- is that a correct
23 statement?

24 **A.** I don't know the year, but he was shot. In --

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1 yes, he was shot.

2 Q. Do you know what season it was that he was
3 shot?

4 A. I think it was, like, fall, winter.

5 Q. Do you know if he was shot prior to your
6 encounter with Watts and A.J. on Mother's Day 2004?

7 A. It was -- it was after.

8 Q. Okay. Would it have been the fall or winter
9 after Mother's Day 2004?

10 A. I can't recall the year.

11 Q. Okay. But regardless, you're thinking it was
12 later in the year. And just so we're also clear, when
13 do you consider fall to start?

14 A. Yes, ma'am. October.

15 Q. Okay. So you think he was shot sometime in
16 October to the colder months that we all hate here in
17 Chicago?

18 A. Yes.

19 Q. After the Mother's Day of 2004?

20 A. It was maybe in, like, October or November.

21 Q. Okay. Ben was shot in his leg?

22 A. In his femur.

23 Q. Okay. Which femur was it?

24 A. I believe it was the right femur.

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1 **Q.** Do you know the circumstances that led to him
2 being shot?

3 **A.** No.

4 **Q.** How did you find out that he was shot?

5 **A.** I pulled up from our boys' school, picking up
6 report cards. And as I was getting out the vehicle,
7 some ladies -- females were standing near this concrete
8 circle and said Ben was shot. He just left in an
9 ambulance.

10 **Q.** Was he shot outside of the boys' school?

11 **A.** No. Because --

12 **Q.** Okay.

13 **A.** No.

14 **Q.** All right. So do you know where physically he
15 was shot at, where he was located?

16 **A.** I personally didn't see where, but the people
17 who were in the neighborhood and outside said in the --
18 it's a schoolyard, not attached to my boys' school,
19 where he was supposedly shot in that area.

20 **Q.** Do you know -- or do you remember what school
21 your boys were attending at this time?

22 **A.** Yes.

23 **Q.** What school?

24 **A.** Mayo Elementary.

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1 Q. So he was not shot at Mayo?

2 A. No, ma'am.

3 Q. Was it Doolittle?

4 A. Yes. From my understanding, yes.

5 Q. Do you know who he was with at the time?

6 A. No.

7 Q. Do you know who he was shot by?

8 A. No.

9 Q. I guess once you received the information that
10 Ben had been shot, what did you do?

11 A. His mother pulled up, and I believe one of my
12 family members also had pulled up, and I asked them to
13 take the boys, and then I went to the hospital.

14 Q. What hospital did you go to?

15 A. I believe Michael Reese was -- it's either
16 Michael Reese or Mercy, but I believe it was Michael
17 Reese Hospital.

18 Q. When you arrived, were you able to see Ben?

19 A. After pleading, yes.

20 Q. Where was he located?

21 A. In the emergency room being attended by the
22 staff, the hospital staff.

23 Q. Was he conscious?

24 A. Yes.

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1 Q. Was he able to tell you what happened?

2 A. No. That wasn't on my mind at the time, or
3 probably his.

4 Q. How long was he in the hospital for?

5 A. I would say a week for sure.

6 Q. Once he was released from the hospital, did
7 you ever have any conversations with him about what led
8 to him being shot or what he was doing that day?

9 A. No.

10 Q. Did Ben ever tell you who he suspected shot
11 him or if he knew who shot him?

12 A. No.

13 Q. Did you ever have any suspicions about who
14 could have shot him?

15 A. Yes.

16 Q. Who did you think it was?

17 A. I assumed it was the person -- I heard rumors,
18 so I was assuming it was that person from the rumors
19 that I was hearing.

20 Q. What were those rumors -- what individual were
21 those rumors about?

22 A. Say it -- I'm sorry. Can you repeat that?

23 Q. What was the name or nickname of the
24 individual you heard those rumors about?

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1 **A.** I don't remember -- I don't recall the names
2 of where the rumor came from. It was people -- a group
3 of females in the lobby, and then they were just talking
4 about the incident.

5 **Q.** And my question is, what did they -- what did
6 you overhear them saying?

7 **A.** I believe it was -- I don't even know for sure
8 or not. Somebody named Ghadi or Getty or something.
9 Someone like that shot him.

10 **Q.** Did -- was the shooting gang related?

11 **A.** I don't know.

12 **Q.** Did you hear rumors that the shooting was gang
13 related?

14 **A.** No.

15 **Q.** Do you know if it had anything to do with
16 competing narcotic sales?

17 **A.** No.

18 **Q.** No, you don't know or no -- no, it did not?

19 **A.** Can you repeat the question one more time?

20 **Q.** Sure. That was a bad question.

21 Is it true that you -- or strike that.

22 Was the shooting gang related?

23 **A.** No.

24 **Q.** Okay. It was not.

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1 **A.** I don't believe so.

2 **Q.** Okay. Do you know if Ghadi was a member of a
3 gang?

4 **A.** I don't even know who he is.

5 **Q.** Had you ever heard that name before Ben was
6 shot?

7 **A.** Have I -- repeat that one more time.

8 **Q.** Prior to Ben being shot, had you heard that
9 name before?

10 **A.** I don't recall.

11 **Q.** Was there ever a criminal prosecution that
12 came out of Ben being shot?

13 **A.** No.

14 **Q.** So what I'm hearing is that after Ben was
15 shot, he gets home from the hospital and you just never
16 spoke about the shooting?

17 **A.** Correct. He was just in pain, and he was okay
18 and had to learn to move that leg again and get his
19 ability -- mobile skills back going.

20 **Q.** Well, he certainly didn't shoot himself,
21 right?

22 **A.** Correct.

23 **Q.** Okay. And it wasn't an accident?

24 **A.** I don't believe so.

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1 **Q.** Okay. And, once again, I know earlier in this
2 deposition you had told me that you couldn't pinpoint --
3 or that you didn't have knowledge of Ben being in a
4 gang.

5 Did that cross your mind when you heard
6 that he had been shot and this other individual was
7 being referenced as the shooter?

8 **A.** No. Only because earlier before in my
9 testimony, I told you what I feel -- my understanding of
10 what a gang is, and so no to your question again.

11 **Q.** Going to June 17th of 2004, do you remember
12 anything about that specific date in terms of the day of
13 the week or what you did?

14 **A.** No.

15 **Q.** Do you know if you had begun working at
16 Comprehensive Health at that time or -- hold on. Is
17 that the name of your -- one moment.

18 Do you know if you were working at that
19 time, in June of 2004?

20 **A.** I believe I was, yes.

21 **Q.** At Comprehensive Quality Health Care?

22 **A.** Most likely, yes, because I kept the job.

23 **Q.** Okay. What were your hours at that time?

24 **A.** Mostly it was 9:00 to 5:00. Some days it

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1 would be maybe, like, 6:00. The latest would be 7:00.
2 But mostly 9:00 to 5:00.

3 Q. Did you work Monday through Friday?

4 A. Yes.

5 Q. And was the Monday through Friday essentially
6 this, you know, full-time 40-hour-plus workweek
7 consistent?

8 A. Yes.

9 Q. And was it consistent for the entirety of your
10 employment there from 2004 to 2014?

11 A. Yes.

12 Q. If the boys were out of school for the summer,
13 were they set up in summer camps or summer programs?

14 A. They had attended some -- I think maybe one
15 summer program. But they were not -- they were
16 attending -- I believe it was one program.

17 Q. Okay. So in -- you know, June 17, 2004, do
18 you know if they were out of school yet?

19 A. Oh, geez. Probably. Yeah, they were. Maybe
20 June. You said June? Yeah.

21 Q. Yes.

22 A. Most likely, yes.

23 Q. Because you were working until 5:00, 6:00, or
24 7:00 p.m. at this point, who would pick the boys up from

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1 school or the summer program, depending on where the
2 boys were at?

3 **A.** To answer your first question, who will pick
4 them up, it would be Ben, their father, Senior. And as
5 far as the summer, I remember one summer camp, but
6 usually they're gone from the -- I had them away from
7 the neighborhood for the whole summer, entire summer.

8 **Q.** Okay. Where would they -- who would they be
9 living with during this -- these time periods?

10 **A.** Relatives.

11 **Q.** Which relatives?

12 **A.** Their family.

13 **Q.** Right. Is it your siblings or your --

14 **A.** Oh, cousins -- well, aunt, cousins, and my
15 parents.

16 **Q.** Would they be usually staying in the city of
17 Chicago, just a different neighborhood?

18 **A.** One did not stay in the city of Chicago. And
19 they were in the suburbs. Suburban area.

20 **Q.** The one that was -- so one was in the suburbs,
21 and the other two were in the city?

22 **A.** One was out of the city, and two was in the
23 suburbs.

24 **Q.** Oh, okay. Was it Gerard that was out of the

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1 city in the summers?

2 **A.** No, ma'am.

3 **Q.** Oh, which one?

4 **A.** Ben, Jr.

5 **Q.** Okay. Do you remember the name of your
6 supervisor from June of 2004?

7 **A.** Debra Lee.

8 **Q.** Who usually got the mail in your household
9 back in June of 2004?

10 **A.** Me.

11 **Q.** When -- and what would be your routine in
12 terms of retrieving the mail?

13 **A.** Going to the mailbox and unlocking the mailbox
14 to retrieve the mail.

15 **Q.** In terms of timing, would you go before work,
16 after work?

17 **A.** It would be after work.

18 **Q.** Prior to June 2004, had you ever observed
19 packaged narcotics in your mailbox?

20 **A.** No.

21 **Q.** Do you know if Ben ever used the mailbox as
22 part of his drug sales?

23 **A.** No.

24 **Q.** No, you don't know or no --

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1 **A.** No, I do not -- no and no. No to both of your
2 questions.

3 **Q.** Had you ever discussed Ben's drug operations
4 with him?

5 MR. TEPFER: Objection to form.

6 BY THE WITNESS:

7 **A.** No.

8 BY MS. OLIVIER:

9 **Q.** Do you know if you specifically visited the
10 mailbox on June 17th, 2004?

11 **A.** What -- what day was that?

12 **Q.** It was a Thursday, June 17, 2004. This is
13 now -- we're talking about -- this is the mailbox case,
14 the day of the mailbox case.

15 **A.** Okay. So I can't directly answer that. I
16 don't recall. It was a lot of vandalism going on at
17 527, where the -- the doors on the mailboxes were taken
18 off a lot of the mailboxes.

19 **Q.** Do you know if you saw Watts that day?

20 **A.** I can't recall.

21 **Q.** Do you know if you saw any Chicago police
22 officers that day?

23 **A.** No.

24 **Q.** So would it be accurate to say that you can't

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1 say that you saw any officers planting evidence that
2 day? Correct?

3 **A.** Correct.

4 **Q.** You never saw any officers planting drugs that
5 day, correct?

6 **MR. TEPFER:** Objection, asked and answered.

7 **BY THE WITNESS:**

8 **A.** That day, correct.

9 **BY MS. OLIVIER:**

10 **Q.** You never saw officers stealing money from any
11 individuals on June 17, 2004, correct?

12 **A.** Correct.

13 **Q.** Do you know who Officer Kenny Young is?

14 **A.** Vaguely. I cannot picture him in my mind, but
15 vaguely.

16 **Q.** Okay. Do you know if you saw him on June 17,
17 2004?

18 **A.** I can't recall.

19 **Q.** Do you know if you saw A.J. on June 17th,
20 2004?

21 **A.** I couldn't re- -- I don't recall.

22 **Q.** An Officer Ridgell?

23 **A.** Not familiar. Cannot recall.

24 **Q.** Officer Summers?

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1 **A.** Same, cannot recall.

2 **Q.** And, lastly, Officer Edwards?

3 **A.** I cannot recall.

4 (C. Glenn Deposition Exhibit
5 No. 8 marked for identification.)

6 MS. OLIVIER: I am going to now mark
7 Exhibit 8.

8 All right. I'm sharing the screen with
9 Exhibit 8, which is a Hyatt receipt from June 17th,
10 2004.

11 MR. TEPFER: Can you give me the Bates number,
12 please?

13 MS. OLIVIER: Sure. It is COPA Watts -- oh,
14 sorry -- Baker Glenn 011361.

15 MR. TEPFER: Okay. Thanks.

16 MS. OLIVIER: No problem.

17 BY MS. OLIVIER:

18 **Q.** So does this Hyatt receipt give you -- bring
19 back what you were doing on June 17, 2004, or what
20 happened on that day?

21 **A.** Repeat your question one more time.

22 **Q.** Tell me the circumstances behind this Hyatt
23 receipt.

24 **A.** What do you mean? Like what circumstances?

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1 Q. Well, your name is on it, correct?

2 A. Correct. Yes.

3 Q. Okay. The date is June 17th, 2004, correct?

4 A. Yes.

5 Q. And then it has a depart date of June 18th,
6 2004?

7 A. Depart date.

8 MR. TEPFER: It's really hard to see on our
9 screen. Sorry.

10 THE WITNESS: Can you make it a little bigger?

11 MS. OLIVIER: Here, I can go in more.

12 BY THE WITNESS:

13 A. Okay.

14 Okay. I see it, yes. It states that.

15 BY MS. OLIVIER:

16 Q. Okay. And it appears it was booked under your
17 name?

18 A. Correct.

19 Q. Okay. And correct me if I'm wrong. I do not
20 see a check-in time here.

21 A. Go -- go back down.

22 Q. Okay.

23 A. Hold on.

24 MR. TEPFER: Is there a question pending?

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1 MS. OLIVIER: Yes. I'm just saying, does she
2 see --

3 BY MS. OLIVIER:

4 Q. Do you see a check-in time at any point on
5 this?

6 A. I don't see anything that says check-in.

7 Q. Okay. Do you know what time you arrived at
8 the Hyatt on June 17th, 2004?

9 A. I would say it would be after 2:00 but before
10 4:00, somewhere in that -- between 2:00 and 4:00.

11 Q. Why were you going to a hotel on June 17,
12 2004?

13 A. For safety.

14 Q. What were the safety reasons?

15 MS. OLIVIER: I'm going to stop sharing.

16 THE REPORTER: I'm sorry?

17 MS. OLIVIER: I'm going to stop sharing right
18 now.

19 Go ahead, Ms. Glenn. I'm sorry.

20 THE WITNESS: No, you're fine.

21 MR. TEPFER: What is the question?

22 BY THE WITNESS:

23 A. What was your question one more time?

24 BY MS. OLIVIER:

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1 **Q.** What was -- what were the safety reasons why
2 you went to the Hyatt?

3 **A.** To get away from the police.

4 **Q.** Walk me through that decision. Why were you
5 con- -- why were you worried about the police?

6 **A.** Ben, I believe, stated that he -- that Watts
7 was looking for him and wanted to -- and wanted to put
8 some drugs on him, wanted to put these drugs from the
9 mailbox, and that's how we actually got to the hotel.
10 That's how that came about.

11 **Q.** So did he have this conversation with you on
12 June 17th, 2004, the date that you went to the Hyatt,
13 the hotel?

14 **A.** Yes.

15 **Q.** Was that your first time hearing about drugs
16 being found in a mailbox?

17 **A.** I believe it was, yes.

18 **Q.** Do you know when those drugs were found in a
19 mailbox?

20 MR. TEPFER: Objection to form.

21 BY THE WITNESS:

22 **A.** No. It was -- no.

23 BY MS. OLIVIER:

24 **Q.** Do you know where Ben got his information

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1 that, you know, this officer was looking to put these
2 drugs on him?

3 **A.** Where he got the information that Ronald Watts
4 wanted to put the drugs on him --

5 **Q.** Yes.

6 **A.** -- from?

7 I'm assuming that he -- I don't recall if
8 Ben told me someone called him or me assuming that he
9 got a phone call because he was doing community service
10 at the time.

11 **Q.** Now, also, at this time -- well, did the boys
12 go with you to the hotel?

13 **A.** Yes.

14 **Q.** And -- and now seeing this receipt, are you
15 recalling whether the boys were still in school and,
16 therefore, in the city still versus being -- not staying
17 at your family home?

18 **A.** I believe that Ben went to -- went out of
19 town, and my other two were with my parents. But I --
20 they were still in school. It was in June. No, they
21 were out of school. They were out of school. They were
22 out of school.

23 **Q.** Were they -- were they still living with you
24 at that time then?

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1 **A.** Were they still living with me? Yes, I still
2 had custody of my kids.

3 **Q.** I meant physically living with you because you
4 said before that in the summers, you sent them out and
5 they wouldn't be living --

6 **A.** Yeah, they were gone. They were gone. And we
7 got them situated so that they can leave for the summer.
8 So they were gone.

9 **Q.** So then how did it come about that they would
10 be at the Hyatt with you if they were not present in
11 Chicago?

12 **A.** I believe that was their last day of school or
13 they had, like, one more day or something. I think it
14 was, like, the -- it was the ending of the school.

15 So at that time, I believe that they had
16 a -- well, they didn't. But the parents had an option
17 to allow the kids to come for the last three days or
18 four days or something to school. And why we had an
19 option was because they would not be doing any
20 technically, like, school work because it was the -- the
21 end of the school year. So the grades were already out,
22 but you had to, I guess, stay in school for a certain
23 amount of time. But yeah. Yes. They were out.

24 **Q.** Do you know -- was it a full school day,

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1 though?

2 **A.** Yeah. It would have been a full school day,
3 yes.

4 **Q.** So do you recall who picked them up from
5 school on June 17, 2004?

6 **A.** It would be Ben and myself.

7 **Q.** How were you able to pick them up if you were
8 working 9:00 to 5:00 or 9:00 to 6:00 or 7:00 at the
9 time?

10 **A.** It was probably one of my vacation days or a
11 day I requested off. Why, I don't know or remember what
12 it was. Because I do have vacation time and sick time
13 that accumulated from over the years. But yeah,
14 probably just took a day here and there.

15 **Q.** Was it common for you to take just a random
16 Thursday off?

17 **A.** No. I had a lot of vacation time because we
18 weren't going anywhere, so no. And it accumulates over
19 the years.

20 **Q.** So do you know what you did that morning?

21 **A.** I dropped Ben off at his community service,
22 took the kids to school. I probably stayed in the
23 house.

24 **Q.** Then what did you -- what did you do for the

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1 remainder of the day?

2 **A.** Probably stayed in the house and -- relaxing
3 or cleaning, but mostly -- probably cleaning, but in the
4 house.

5 **Q.** When did you leave the home -- your apartment
6 again?

7 **A.** To go pick up Ben from his community service
8 place, destination.

9 **Q.** Do you know what time you picked Ben up at?

10 **A.** What time?

11 **Q.** Yes.

12 **A.** It would have to -- I believe it was after
13 2:00.

14 **Q.** When did you -- and then what time would you
15 have picked the boys up from school with Ben?

16 **A.** 2:45. They get out at 2:45.

17 **Q.** And you would have been there right on time?

18 **A.** Yes. Because -- yes.

19 **Q.** Do you recall where Ben was doing his
20 community service at the time?

21 **A.** No. Not where he would -- it would be
22 different locations. They would take him to different
23 locations.

24 **Q.** Do you know where he was on June 17th, 2004?

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1 **A.** For his community service?

2 **Q.** Yes.

3 **A.** No, ma'am. No, ma'am.

4 **Q.** And this was court-ordered community service,
5 correct --

6 **A.** Yes.

7 **Q.** -- during his probation?

8 What did you do after you picked the boys
9 up from school?

10 **A.** We went to this -- like a little -- a store on
11 26th or 27th off of Wabash, I believe, and it's like a
12 store that sells, like, off -- name brand clothing and
13 socks and things like that. And we went and got the
14 boys some clothes, swim trunks and things like that.

15 **Q.** Out of all the hotels in the city, why did you
16 choose the Hyatt?

17 **A.** I guess because it was close -- close to the
18 neighborhood. I'm assuming. But we -- I have no idea.
19 Close.

20 **Q.** As we've gone through your day and realizing
21 that, you know, you would have picked the boys up from
22 school at 2:45, then you stopped to get swim trunks, are
23 you now recalling approximately what time you might have
24 checked into the hotel?

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1 **A.** So it would be after that. It would be, of
2 course, after 2:45, but I believe it was before 4:00 or
3 by 4:00.

4 **Q.** Was this -- did you intend to spend the night
5 on June 17, 2004, prior to that date, or was this a
6 decision that you made on June 17th because it was an
7 urgent situation?

8 **A.** A decision made at that time. An urgent
9 situation, no.

10 **Q.** And the plan was to spend the night at the
11 hotel?

12 **A.** It really wasn't a plan.

13 **Q.** Well, once you established that you needed to
14 be somewhere else, that place you chose was to go to the
15 Hyatt, and it was an overnight visit, correct?

16 **A.** Yes.

17 **Q.** Okay. Do you know what time it was that you
18 and Ben reached this decision that you had to book this
19 hotel room?

20 **A.** No. No, I do not.

21 **Q.** Did Ben communicate with you while he was at
22 community service during that day?

23 **A.** No.

24 **Q.** So would it have been when you picked him up

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1 that he gave you this information?

2 **A.** Yes.

3 **Q.** Okay. So when you dropped off the boys to
4 school in the morning, they had no idea that this was
5 going to be happening?

6 **A.** Right. We did not.

7 **Q.** They did not have any overnight clothes then
8 with them, correct?

9 **A.** Correct.

10 **Q.** So how did you handle that?

11 **A.** Well, first, as soon as we -- well, after we
12 check in and got our room and everything, the boys was
13 anxious to go swim. So, of course, they have their swim
14 trunks and all the rest of their uniform, because they
15 were in uniform. So yeah. And then there's a sink, so
16 yeah. Make do.

17 **Q.** So they were just going to wear the same
18 clothes for that overnight trip?

19 **A.** Really, the day was basically over, but yes.
20 To answer your question, yes.

21 **Q.** Did -- and you stayed in the Hyatt just for
22 one night?

23 **A.** I believe that we stayed in the Hyatt for
24 two -- two to three, but I'm saying two for sure nights.

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1 Q. Were the boys with you that whole time?

2 A. No. They were just there for that one night.

3 Q. Okay. We only have this receipt from this one
4 night. How is it that we have this receipt but none of
5 the other receipts for the additional nights?

6 A. Because when I went downstairs to the lobby, I
7 think checkout was at 11:00 or something, but that
8 morning when I went downstairs to the lobby, I asked
9 about staying another additional day, and they asked
10 me -- that was no problem. And they asked me -- told me
11 the price, which I forgot the price, and they asked me,
12 how would I like to pay? And I asked him, can I pay in
13 cash? And then they said yes. And I believe that I
14 paid in cash. But we did stay two nights.

15 Q. How did you obtain this receipt?

16 A. I did not.

17 Q. So you didn't get any receipts from your time
18 there?

19 A. This particular receipt that you have, I
20 probably did. Most likely, I would say, yes, I did get
21 a receipt. But did I hold onto it? No.

22 Q. So where did this receipt come from?

23 A. Let me ask my lawyer.

24 THE WITNESS: Where do you think it's from?

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1 MR. TEPFER: I can't answer that.

2 BY THE WITNESS:

3 A. We can't answer that.

4 MR. TEPFER: I can't. I'm not being deposed.

5 If you know, you know. If you don't know, you

6 don't know. You have to answer the question.

7 BY THE WITNESS:

8 A. Oh.

9 BY MS. OLIVIER:

10 Q. Do you know where this receipt came from?

11 A. No.

12 Q. You still had to show your ID in order to book
13 the additional night, though, correct?

14 A. I don't recall -- I don't recall that. I'm
15 assuming that because they already had the information,
16 I didn't have to show my ID.

17 Q. Do you know why a receipt -- why a receipt
18 wouldn't have been generated?

19 A. It might have. It might have. I just
20 didn't -- didn't keep it, because once I, you know, paid
21 for it and took care of it, there was no need for me to,
22 you know, hold onto the receipt.

23 Q. You mentioned that the boys went to the
24 swimming pool?

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1 **A.** Yes, ma'am.

2 **Q.** Did they -- did you or Ben go with them?

3 **A.** No.

4 **Q.** Were they able to swim?

5 **A.** Yes.

6 **Q.** Why did you and Ben not go with the boys to
7 swim?

8 **A.** I don't swim.

9 **Q.** Okay. I mean, you didn't go to even just
10 watch them?

11 **A.** No.

12 **Q.** After arriving at the hotel, did you meet up
13 with anyone else there?

14 **A.** Did I meet up with anyone?

15 **Q.** Did anyone come to see you at the -- you, your
16 husband, or the boys at the hotel while you were staying
17 at the Hyatt?

18 **A.** Yes. Ben did have a visitor.

19 **Q.** Who was his visitor?

20 **A.** Jamar Lewis.

21 **Q.** Do you know when he first met Jamar Lewis?

22 **A.** No.

23 **Q.** How long have you known Jamar Lewis for?

24 **A.** Now it would be -- I know over -- probably

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1 over 15 years.

2 Q. When did the boys -- so when did the boys --
3 when did you separate from the boys in -- after this
4 June 17th date?

5 A. The 18th. June 18th.

6 Q. Okay. And where did they go?

7 A. They went to my parents' house.

8 Q. Okay. Who took them there?

9 A. I did.

10 Q. Did you stop by 527 first?

11 A. Yes, I did.

12 Q. Okay. And what did you do at 527?

13 A. Obtained clothing.

14 Q. Okay. Fast-forwarding to June 11th, 2004.

15 This was a Sunday. When did you first become aware that
16 Ben was arrested on that date?

17 A. I'm sorry. Repeat it one more time.

18 Q. Sure.

19 On Sunday, June 11th, 2004, when did you
20 first become aware that Ben was arrested?

21 A. Was that the mailbox case?

22 Q. Yes. This is July 11, 2004, so approximately
23 a month later.

24 A. I would assume it was -- I would assume it was

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1 the same day. It was the same day. Yeah, the same day.

2 Q. Do you know how you found out that he was
3 arrested?

4 A. I don't recall.

5 Q. Do you know where you were when you found out
6 that he was arrested?

7 A. I wanted to say our apartment, but I can't
8 recall.

9 Q. Do you recall observing him being arrested?

10 A. I can't recall, but I believe so. But I --
11 it's very vague.

12 Q. Are you able to identify any of the officers
13 that arrested him on June -- excuse me, July 11, 2004?

14 A. No. I don't remember.

15 Q. Are you able to describe any misconduct that
16 the officers engaged in when they were arresting your
17 then-husband on July 11, 2004?

18 MR. TEPFER: Objection to form.

19 BY THE WITNESS:

20 A. Was he the only one that got arrested that
21 day?

22 BY MS. OLIVIER:

23 Q. You have to answer my question.

24 A. Oh. Okay.

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1 I don't re- -- I don't recall.

2 Q. Okay. So you can't testify that you observed
3 any officers -- excuse me -- Chicago police officers
4 planting drugs, stealing money, or committing any
5 misconduct on July 11th, 2004, in relation to your
6 husband's arrest or any other arrest?

7 A. I would say at this time today, August 26th,
8 2021, at 4:43, I'm going to say no.

9 MR. TEPFER: Do you want to take a break?

10 THE WITNESS: Uh-uh.

11 MR. TEPFER: No.

12 THE WITNESS: Uh-uh.

13 BY MS. OLIVIER:

14 Q. We're going to actually jump a bit to your
15 case before I work my way back through some of Ben's
16 other arrests.

17 But directing your attention to Sunday,
18 December 11th, 2005, what do you remember about that
19 day?

20 A. I don't recall.

21 Q. Do you know what time you woke up that
22 morning?

23 A. No.

24 Q. Do you know what you did -- do you know what

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1 you did that day prior to the arrest?

2 **A.** No.

3 **Q.** Tell me. Do you know what time you were
4 arrested at?

5 **A.** What -- what month and -- what month did you
6 say?

7 THE WITNESS: Let me take a break.

8 MR. TEPFER: I think we need to take a break.

9 Do you want her to answer that question or --

10 MS. OLIVIER: Yes, please.

11 MR. TEPFER: Okay. What's the question?

12 BY THE WITNESS:

13 **A.** What's the question, please?

14 BY MS. OLIVIER:

15 **Q.** The answer was -- so this is talking about
16 your arrest on December 11 2005.

17 **A.** Okay.

18 **Q.** Do you know what time you were arrested?

19 **A.** Oh, okay. Yeah. I'm tired.

20 It would be between maybe, like, 12:30 and
21 2:00, 2:30, 3:00.

22 MR. TEPFER: Okay. We're going to take a
23 break.

24 MS. OLIVIER: Okay.

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1 THE VIDEOGRAPHER: We are now going off the
2 record at 4:43 p.m.

3 (Recess.)

4 THE VIDEOGRAPHER: The time is 4:51 p.m. We
5 are now back on the record.

6 MR. PALLES: Did you want to say something,
7 Ms. Glenn, or...

8 THE WITNESS: I wanted to say something to
9 Ms. Kelly.

10 MS. OLIVIER: Sure.

11 THE WITNESS: Hey. I apologize for the
12 interruption. It's just been a long -- it's just
13 been a long day. I'm new to this for myself
14 personally. And I would like to know if we can
15 just start over because I was a little tired and --
16 well, I am a little tired and just a little
17 fatigued, nervous, and not eating, even during our
18 breaks when I am instructed to.

19 MS. OLIVIER: Start over from your date of
20 birth? No. I'm joking.

21 THE WITNESS: No. No. No. No. No. No.

22 Just from before if we took our break, if
23 you don't mind.

24 MS. OLIVIER: Yeah. Sure. Hold on.

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1 Eric, do you want to --

2 MR. PALLES: If I -- yeah. Listen. I can
3 tell that, Josh, you're keeping track of time,
4 which means that you're going to end this in
5 approximately one hour. I would suggest to you
6 that given the magnitude of this case, its impact
7 on the other cases, and the fact that there are
8 three separate arrests, as well as, what, maybe a
9 dozen defendants, that we agree that we're going to
10 need additional time.

11 I don't want that much additional time,
12 but it's clear that if Kelly stopped right now, I
13 wouldn't have sufficient time to ask the questions
14 that I want to. So I'm proposing that we
15 acknowledge the fact that this will go on a
16 separate day for some period of time and that, you
17 know, if you want her to stop now -- Ms. Glenn
18 getting tired -- we could do that and go for
19 another six hours on another day or, you know, if
20 you want to push ahead for a little while, I'll go
21 as long as you want today.

22 But I'm going to be -- well, what's your
23 attitude, Josh, towards going some period of time
24 on a second day?

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1 MR. TEPFER: We're going to finish the hour
2 today, and then I'll talk to my team, if you're
3 asking for more time. But we're just going seven
4 hours today.

5 MR. PALLES: All right. Well, then I would
6 like you to commit then to call me tomorrow, you
7 know, pursuant to the local rule. Because I'll --
8 because we'll --

9 (Audio distortion.)

10 MR. PALLES: I beg your pardon? I'm sorry --

11 MR. TEPFER: I didn't say anything. I didn't
12 hear it.

13 MR. PALLES: Well, anyway, yeah. You know,
14 call me because we'll have a meet and confer as
15 soon --

16 MR. TEPFER: Okay.

17 MR. PALLES: -- as possible.

18 Maybe somebody else on this phone will want to
19 do that, but this is something, you know, that I
20 think we should be able to resolve. Okay.

21 MR. KOSOKO: Include us in that circulation,
22 also, please.

23 MR. TEPFER: Okay. Just send me an e-mail
24 when you want to meet tomorrow. I think I'm

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1 available --

2 MR. PALLES: Okay.

3 MR. TEPFER: -- in the morning. That's fine.

4 MR. PALLES: Thank you.

5 MR. TEPFER: Sure.

6 BY MS. OLIVIER:

7 Q. Okay. All right, Ms. Glenn. I hear you. It
8 has been a long day. We have one hour left.

9 Do you feel ready to proceed?

10 A. Yes, ma'am.

11 Q. Okay. All right. We'll start over with
12 December 11, 2005, the date of your arrest.

13 A. Okay. Thank you.

14 Q. All right. So my first question was, do you
15 remember this date?

16 A. Yes.

17 Q. Okay. Do you know what you did that morning?

18 A. Yes.

19 Q. Okay. What did you do?

20 A. Of course, got up. Had to get my stuff
21 together so that I can go and rent a U-Haul truck and
22 pick up my sister so that we can go and remove items out
23 of my parents' home.

24 Q. Is this the home on the south side of Chicago

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1 that you've referenced where you -- your childhood home,
2 where you grew up?

3 **A.** No, ma'am. They actually moved to Olympia
4 Fields.

5 **Q.** Okay. When did they move there?

6 **A.** Probably in '98. Between '98 and 2000, I
7 believe.

8 **Q.** Is Olympia Fields a suburb?

9 **A.** Yes, ma'am.

10 **Q.** Okay. And that actually reminds me. You had
11 noted that your father was a Chicago police officer at
12 some point during his career.

13 Do you know when he retired or stopped
14 working for CPD?

15 **A.** No, ma'am.

16 **Q.** Okay. Do you know if the move to Olympia
17 Fields was in some way tied to the fact that he was no
18 longer a city employee so he could live in the suburbs?

19 **A.** Yes.

20 **Q.** Okay.

21 **A.** When he was not, yes.

22 **Q.** Okay. So he had ceased being a Chicago police
23 officer by the time he moved to Olympia Fields?

24 **A.** Yes, ma'am.

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1 **Q.** Do you know what district he worked out of?

2 **A.** No.

3 **Q.** Do you know what his title or rank was within
4 CPD?

5 **A.** No.

6 **Q.** Going back to December 11, 2005. So you
7 mentioned -- do you know approximately what time you got
8 up that morning to start this day of yours?

9 **A.** I do not remember the time. No, ma'am.

10 **Q.** Okay. Okay. So you rent a U-Haul. You go to
11 your sister's home to pick her up and then you go to
12 your parents' home?

13 **A.** I can't recall if she came. I got the U-Haul.
14 I can't recall if she came over or we went together to
15 get the U-Haul. But on our way there, we were in a
16 U-Haul together to my -- my parents' home in Olympia
17 Fields.

18 **Q.** How long were you at the home for removing
19 items?

20 **A.** I don't recall.

21 **Q.** Was it on this date that you removed the
22 bullets that were found after your father passed?

23 **A.** I don't recall because we went back another
24 time. I don't recall.

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1 **Q.** All right. So do you know what time you left
2 the home at?

3 **A.** No.

4 **Q.** Did you leave the home in the U-Haul?

5 **A.** Yes.

6 **Q.** Okay. And where did you take the U-Haul?

7 **A.** To my -- to 527 East Browning.

8 **Q.** And what did you do with the U-Haul once you
9 were at --

10 **A.** Before -- before we went to 527 East Browning,
11 we stopped at 86th and Sangamon, where my sister
12 resided.

13 **Q.** Okay.

14 **A.** And we unloaded some of the items at her
15 location.

16 **Q.** Okay.

17 **A.** And then 527 East Browning.

18 **Q.** Do you know what time you arrived back at your
19 home?

20 **A.** No.

21 **Q.** Is this still the morning at this point?

22 **A.** I believe so. I'm not 100 percent sure.

23 **Q.** Okay. Was your sister with you --

24 **A.** No.

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1 **Q.** -- when you arrived --

2 Okay. So you dropped her off at her home
3 when you removed some of the items from the U-Haul at
4 her place?

5 **A.** Correct.

6 **Q.** What did you do once you arrived at 527 East
7 Browning?

8 **A.** Unloaded some of the items that I had of my
9 parents at my home. That's what I did when I arrived.

10 **Q.** Was anyone from your family home when you were
11 doing this?

12 **A.** Yes. Ben was there. And I believe the boys,
13 but I know Ben was there.

14 **Q.** What were they doing?

15 **A.** Ben was helping me -- Ben and some other
16 residents were helping taking some of the things off the
17 truck.

18 **Q.** Who were some of the other residents that were
19 helping you take things off the truck?

20 **A.** I don't recall.

21 **Q.** Did you know them?

22 **A.** I seen some of the faces before.

23 **Q.** Did you trust them?

24 **A.** To remove heavy items?

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1 Q. Yes.

2 A. Sure. Why not? Sure. That's fine.

3 Q. How long did the unloading take?

4 A. Not long. I only had one or two pieces.

5 Q. What's not long? 15 minutes? 30 minutes?

6 A. Probably under 30. Me assuming.

7 Q. Okay. After the items were unloaded, what did
8 you do next?

9 A. Took the U-Haul back to the U-Haul place.

10 Q. Do you know where the U-Haul place was
11 located?

12 A. On South Chicago.

13 Q. After you dropped the U-Haul off, what did you
14 do?

15 A. Went to my aunt's house.

16 Q. Where did your aunt live?

17 A. At the time, she was living on Prairie. I
18 believe it was between 56th and 45th and Prairie.

19 Q. Do you know what time you arrived at your
20 aunt's house?

21 A. No. I can't recall.

22 Q. Do you know if it was still morning or
23 afternoon?

24 A. I believe it was -- no, I can't. No.

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1 **Q.** How did you get from the U-Haul location to
2 your aunt's house?

3 **A.** My brother.

4 **Q.** Which brother?

5 **A.** Clarence.

6 **Q.** He was still living in Chicago at the time, or
7 was he back visiting?

8 **A.** He was in Chicago at the time.

9 **Q.** Did Clarence stay with you at your aunt's
10 house?

11 **A.** No.

12 **Q.** How long did you stay at your aunt's house?

13 **A.** I can't recall the time.

14 **Q.** At some point, did you leave your aunt's
15 house?

16 **A.** Yes.

17 **Q.** Okay. How did you leave?

18 **A.** Ben came to pick me up.

19 **Q.** Do you know what time he arrived to pick you
20 up?

21 **A.** No, ma'am.

22 **Q.** Do you know if it was still morning or if it
23 was afternoon at this point?

24 **A.** I believe -- I believe it was early afternoon,

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1 but no, I can't pinpoint the time -- the times.

2 THE VIDEOGRAPHER: Excuse me, Counsel. Sorry
3 to interrupt. I'm losing the witness again on the
4 video.

5 MR. TEPFER: All right.

6 THE VIDEOGRAPHER: That's okay. Thank you.

7 BY MS. OLIVIER:

8 Q. When Ben arrived to pick you up, did you have
9 any conversation with him?

10 A. I believe he asked me was I -- am I okay. I
11 believe he said that he was having company coming over
12 and his mother was coming over to make some chili or
13 something.

14 Q. Why was he asking you if you were okay?

15 A. Because that's the -- the closure for my
16 parents' home, one of their homes.

17 Q. Were -- was this after your father had passed
18 at this point, when you were removing these items?

19 A. Yes.

20 Q. Was your -- where did your mom -- was your mom
21 living back in the city at this point?

22 A. Yes.

23 Q. Besides the -- him discussing the plans for
24 the remainder of the day and -- does that conversation

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1 jog your memory at all in terms of what time it would
2 have been that you were having this conversation about
3 when people were coming over?

4 **A.** No. It -- no.

5 **Q.** Did he tell you a time of when to expect
6 people coming over?

7 **A.** No.

8 **Q.** How long did it take -- or did he then take
9 you back to 527?

10 **A.** Yes, ma'am.

11 **Q.** What's the distance between your aunt's house
12 and 527?

13 **A.** Well, with me driving, according to the
14 guideline rules of the street, it would be probably
15 20, maybe 25 minutes, if that. It might not even be
16 25 minutes.

17 **Q.** What happened -- what, if anything, happened
18 when you got back to your neighborhood and Ida B. Wells
19 Homes?

20 **A.** As we were entering -- Ben was driving. And
21 as we were entering the parking lot, which is located on
22 the side of 511, we were headed east. My vehicle --
23 which we were in my vehicle. We were headed east,
24 facing 527.

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1 A blue-and-white lights were on. I
2 instructed Ben to stop so that they can go around or
3 we're not in the way. As we stopped, Ben decided to
4 leave the truck there, and we were getting out. But the
5 officers stopped and told to us stay in the car.

6 **Q.** So let's back up a little bit for one second.

7 Which officers told you to -- are there
8 two separate cars of officers at this point?

9 **A.** At the time that we had gotten stopped, it was
10 one police -- one officer, one police car,
11 blue-and-white police car.

12 **Q.** All right. And where was this car in
13 relationship to your car when you stopped to get out?

14 **A.** Ask me one more time.

15 **Q.** When you stopped -- when Ben stopped the car
16 for you and Ben to exit the vehicle, where was that
17 blue-and-white in relationship to your vehicle?

18 **A.** Like on the side, on the side of us, but not
19 directly with us, but it was on the side.

20 **Q.** If you're seated in the car, is it -- and
21 you're facing forward, would it have been to your right
22 or to your left?

23 **A.** It would have been to my left.

24 **Q.** Okay. So you proceed to try to get out of the

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1 car. Then what happens?

2 **A.** He instructed us to stay inside the car.

3 **Q.** Okay. What happened then?

4 **A.** A dark black car or a dark vehicle pulled up
5 behind my -- my truck, my Jimmy truck. And that's when
6 Watts and Alvin Jones got out of the vehicle.

7 **Q.** So at this point, there's the blue-and-white
8 car with the police officer. Is that police officer in
9 uniform?

10 **A.** Yes.

11 **Q.** Did that officer exit his or her vehicle?

12 **A.** Yes.

13 **Q.** And was it a male or female officer?

14 **A.** A male.

15 **Q.** What did that officer look like?

16 **A.** Tall, Caucasian. Maybe like five-seven,
17 five-six maybe. Five-seven.

18 **Q.** Did you recognize --

19 **A.** Caucasian.

20 **Q.** Did you recognize --

21 **A.** Never seen him -- never seen him before.

22 **Q.** At this point, in December of 2005, did you
23 recognize Al Jones and Sergeant Watts?

24 **A.** You said when? I'm sorry.

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1 **Q.** On this date that we're talking about,
2 December 11, 2005.

3 **A.** Yes. Yes. I did recognize Jones and Watts.

4 **Q.** How did they arrive at this location?

5 **A.** In a dark-tinted vehicle, four-door vehicle.

6 **Q.** When they arrived, where did they position
7 their vehicles in relationship to yours?

8 **A.** Directly behind my truck, my Jimmy GMC truck.

9 **Q.** And is this the same GMC that we discussed
10 earlier, the beige/tan that was used that you purchased
11 after you had the Dodge Intrepid?

12 **A.** Yes, ma'am.

13 **Q.** Who was driving the vehicle that Watts and
14 Jones arrived in?

15 **A.** Watts.

16 **Q.** They exited the vehicle?

17 **A.** Yes, ma'am.

18 **Q.** All right. And at the time they exited the
19 vehicle, where were you and Ben?

20 **A.** Ben was in the driver's seat, and I was in the
21 passenger's seat.

22 **Q.** Okay. What happened -- how were you able to
23 see that they arrived?

24 **A.** As they were getting out the car. When they

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1 opened their car door, as they were getting out.

2 Q. Where did you -- did you turn around? Like,
3 how were you able to identify that there was someone
4 behind you, if you were facing forward?

5 A. I can't recall.

6 Q. Okay. What happened next?

7 A. I asked Ben did he have any -- any drugs or
8 anything in the car.

9 Q. Why did you ask him that?

10 A. It's Watts.

11 Q. What does that mean?

12 A. It means a lot.

13 Q. Explain, please.

14 A. It's just -- it's a lot. You could -- I
15 apologize. It's just Watts. And I feel -- personally
16 feel that he has a hard-on for Ben, and he will make any
17 situation that's not as big or small into a bigger one.

18 So I asked Ben. He said -- he indicated
19 no, he did not. I asked him did he have some weed in
20 the car, and he said no.

21 Q. So when you first asked him, do you have any
22 drugs in the car, then you asked him do you have any
23 weed in the car to kind of try to cover all bases for a
24 potential problem?

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1 **A.** Yes. And I -- I believe I asked "Do you have
2 anything in the car," not just drugs. And then I did
3 say weed.

4 **Q.** Had you asked or been around Ben before and
5 had to ask him, "Hey, do you have any drugs on you? Do
6 you have any weed on you?"

7 **A.** No.

8 **Q.** Okay. So this was the first time you'd asked
9 him these questions?

10 **A.** Yes.

11 **Q.** Did he seem surprised that you were asking him
12 these questions since you've never discussed his drug
13 dealing before?

14 **A.** No. I don't think so.

15 **Q.** Okay. Was it kind of an unspoken agreement
16 between you two that you just looked the other way as he
17 lived his life?

18 MR. TEPFER: Objection, form.

19 Go ahead.

20 BY THE WITNESS:

21 **A.** I -- I don't know. It was just not talked
22 about. Spoken about.

23 BY MS. OLIVIER:

24 **Q.** So at this point, we're about six months after

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1 your initial assumption that Ben was possessing and
2 selling narcotics.

3 Had you been cleaning your apartment
4 during that time?

5 **A.** What do you mean?

6 **Q.** Yes or no, had you been cleaning your
7 apartment during that time?

8 **A.** I don't understand your question.

9 **Q.** Do you know what cleaning is?

10 MR. TEPFER: Objection, argumentative.

11 BY THE WITNESS:

12 **A.** You can't -- if you can break it down to the
13 lowest term, I probably can understand. But I don't
14 understand your question.

15 BY MS. OLIVIER:

16 **Q.** I'm just asking if from June 2004 -- excuse
17 me. We're actually a year and a half later.

18 June 2004 to -- or sorry.

19 From Mother's Day 2004 through
20 December 11, 2005, did you clean your apartment, tidy
21 things up, move things around, open places to clean it?

22 **A.** I'm sure I have, yes.

23 **Q.** During the course of cleaning your apartment
24 and knowing this -- your assumption that you developed,

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1 did you ever come across any drugs in your apartment?

2 MR. TEPFER: Objection to form.

3 Go ahead.

4 BY THE WITNESS:

5 A. No.

6 BY MS. OLIVIER:

7 Q. Did you ever see drugs in your apartment?

8 A. Yes.

9 Q. What types of drugs?

10 A. Marijuana --

11 Q. Beyond marijuana --

12 A. -- and --

13 Q. I'm sorry.

14 A. Marijuana and -- that would be about it that I
15 had noticed, was the marijuana.

16 Q. Beyond marijuana, did you ever see cocaine in
17 your apartment?

18 MR. TEPFER: Objection to foundation.

19 BY THE WITNESS:

20 A. No.

21 BY MS. OLIVIER:

22 Q. Did you ever see heroin in the Ida B. Wells
23 Apartment 206?

24 A. No.

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1 **Q.** After Ben relayed to you that, no, there was
2 nothing in the car, what did you do?

3 **A.** I was sitting there, and then I was
4 instruct -- we or me. You asked about me.

5 I was instructed to get out of the
6 vehicle.

7 **Q.** Did you comply?

8 **A.** Yes.

9 **Q.** And where did you go once you exit the
10 vehicle?

11 **A.** On the side -- on the passenger's side, closer
12 to the crack of the door, where it opens at, and the
13 side where the tire ends, the side tire ends on the
14 passenger side.

15 **Q.** What did Ben do?

16 **A.** He also was instructed to get out of the car.

17 **Q.** Where did -- did you see where he went?

18 **A.** He was on the driver's side, right in front,
19 but more on the side of the headlight on the driver's
20 side in the front of the vehicle.

21 **Q.** So he was slightly ahead of you, but on the
22 opposite side of the vehicle?

23 **A.** Yes.

24 **Q.** Did any other officers besides Watts and Jones

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1 come on the scene this Sunday, December 11, 2005?

2 **A.** Yes.

3 **Q.** Okay. Approximately how long after Jones and
4 Watts arrived did other officers come on the scene?

5 **A.** It seemed like eternity that other officers
6 arrived on the scene. I don't have a time frame.

7 **Q.** Okay. So just focusing now on -- do you know
8 how long it was after Watts and Jones arrived that you
9 exited the vehicle?

10 **A.** No. No.

11 **Q.** Was it within a matter of seconds, minutes, an
12 hour?

13 **A.** Probably assuming a matter of second -- in a
14 matter of seconds.

15 **Q.** So relatively quick?

16 **A.** Yes, ma'am.

17 **Q.** Okay. Once you -- who ordered you to exit the
18 vehicle?

19 **A.** I'm assuming it was Watts. I'm assuming
20 Watts.

21 **Q.** Once both you and Ben exited the vehicle, what
22 happened next?

23 **A.** Watts and A.J. searched -- Alvin -- searched
24 my vehicle, looked at the hood, opened the back doors,

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1 opened the hatch to my truck, removed items that were in
2 my vehicle. I believe it was items -- not believe.
3 There was items in the hatch part. Yeah. They searched
4 forever.

5 Q. What is forever to you?

6 A. When they -- when they get out their car and
7 pulled up, from the time that they came in my presence
8 until the time that they left my presence was forever.

9 Q. Do you know how long -- so how long were they
10 searching in your vehicle for?

11 A. Too long. A long time. It, to me, appeared a
12 long time. It seemed like it was an hour, two hours.
13 It seemed forever. It honestly seemed -- it was a long
14 time.

15 Q. Were Watts and Alvin working, like, in sync,
16 together, next to each other, or are they at different
17 areas of the vehicle as they were searching it?

18 A. They were at different area -- different areas
19 of the vehicle.

20 Q. Okay. At any point during this time that
21 they're searching the vehicle, did other officers
22 arrive? Or was that later on?

23 A. After they complete their search, it was
24 later --

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1 **Q.** Okay.

2 **A.** -- when the officers arrived.

3 **Q.** So they're searching the vehicle, kind of
4 being on opposite sides and opposite locations of the
5 vehicle the entire time, and at some point the search
6 stops?

7 **A.** Yes.

8 **Q.** Okay. Do you know why the search stopped?

9 **A.** Yes.

10 **Q.** Okay. Tell me what happened.

11 **A.** Why it stopped?

12 **Q.** Yes.

13 **A.** Ronald Watts came out of his left sleeve with
14 appears to be a plastic bag holding -- appeared to be
15 narcotic substance in these plastic bags. Held it up
16 and said he found it.

17 **Q.** Where was Alvin at this time?

18 **A.** The back of the hatch, back of the car.

19 **Q.** Where was Watts when he -- when you saw him do
20 this?

21 **A.** The driver's side, the door. The door was
22 open, so the door of the car. He was inside, between
23 the -- the inside of the open car and the door being
24 open.

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1 Q. What was he wearing that he was able to pull
2 something out of his sleeve?

3 A. Probably civilian clothes. Probably some
4 jeans. Me assuming. I don't know.

5 Q. Okay. You don't --

6 A. But it was --

7 Q. -- remember?

8 A. Don't recall. I don't recall.

9 Sorry.

10 Q. Was he -- how -- what direction was his body
11 facing when you saw him do this?

12 A. His body was in an angle, but mostly I would
13 say, like, towards 527.

14 Q. And 527 is behind him at this point?

15 A. No. 527 would be in front.

16 Q. Would his back --

17 A. East.

18 Q. -- have been to 527?

19 A. Oh, his back would be towards, like, the
20 street of -- towards the street, not towards the Chicago
21 Housing buildings or anything. It would be an open lot
22 and some other buildings back there, where we come in
23 at, turn in. But no.

24 Q. Were you still standing at the front of the

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1 car at this point?

2 **A.** I was on the side of the car, yes.

3 **Q.** And what was -- did you have a clear view of
4 him?

5 **A.** Yes.

6 **Q.** How did you have a clear view of him?

7 **A.** The windows.

8 **Q.** Which windows?

9 **A.** The front window, the windshield.

10 **Q.** So you could see through the front windshield
11 that he did this?

12 **A.** Yes, ma'am.

13 **Q.** Okay. Once that occurred -- so you said he
14 took it out of his sleeve and yelled -- or proclaimed he
15 found it.

16 **A.** I didn't say proclaimed. He said, "I got it.
17 I found it."

18 **Q.** "I got it. I found it." Okay.

19 And then what happened next?

20 **A.** And I said that was -- I think I said that was
21 some bullshit or something. You came out of your -- I
22 actually stated that "You came out of your sleeve with
23 that. That's some bullshit."

24 I don't care. Put their hand -- lock him

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1 up or put the handcuffs on him. And then the
2 blue-and-white female officers came and he's "Lock her
3 ass up, too."

4 Q. So when did a blue-and-white female officer
5 arrive?

6 A. Like seconds after he came out of his sleeve
7 with the bundle.

8 Q. Besides the female blue-and-white officer, the
9 other blue-and-white officer that you've already
10 referenced, Jones and Watts, were there any other
11 officers that arrived on scene?

12 A. No. Just that -- you said that male officer,
13 correct, the first one in the -- no. That would be it.

14 Q. Okay. After that female officer arrived, what
15 happened?

16 A. I was -- I believe I was patted down,
17 handcuffed, put in the back of the police -- the
18 blue-and-white police car.

19 Q. Where did -- was Ben with you in the car?

20 A. No, ma'am.

21 Q. During the time, did Ben ever say anything out
22 loud after you speak up to Watts?

23 A. No. He never do.

24 Q. What do you mean, "He never do"?

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1 **A.** I always speak up. But no.

2 **Q.** You always speak up, and Ben does not?

3 **A.** Yes.

4 **Q.** Do you know why?

5 **A.** No.

6 **Q.** Once you went to -- arrived at the police
7 station, which police station was it?

8 **A.** Watts' police station.

9 **Q.** Which is located where?

10 **A.** 51st and Wentworth.

11 **Q.** Okay. What happened once you -- where were
12 you taken once you arrived?

13 **A.** I'm assuming it was the back, but when I went
14 into the -- into this open space room, it was long
15 tables or desks connected one another. It was probably
16 like three rows with typewriters and officers sitting at
17 various typewriters.

18 **Q.** Did you recognize any of the officers in that
19 room?

20 **A.** Yes.

21 **Q.** Who did you recognize?

22 **A.** The first person I saw was Mohammed.

23 **Q.** Now -- during the course of today, you haven't
24 mentioned Mohammed.

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1 When did you first come to know Mohammed?

2 MR. TEPFER: Objection, mischaracterizes the
3 prior testimony, form.

4 BY THE WITNESS:

5 **A.** I don't know him. I just know that he works
6 on Watts' team, if that's what you're saying.

7 BY MS. OLIVIER:

8 **Q.** So kind of going back a little bit, you had
9 mentioned that Mother's Day 2004 is the first time that
10 you're actually seeing Watts face-to-face and that you
11 were generally aware that there were plainclothes
12 Chicago police officers that patrolled the Ida B. Wells
13 Homes; is that fair?

14 **A.** That's fair.

15 **Q.** Were there certain -- and you also mentioned
16 that Jones, Mohammed, and Watts were three names that
17 you associated with Watts specifically.

18 Now that we've been going for a while
19 today, are you recalling any other officers that you're
20 associating with what you're calling Watts' team?

21 **A.** No. Unless I see a picture, but I'm going to
22 stick with what I just -- I said earlier.

23 **Q.** Okay. So you saw Mohammed. What happened?

24 **A.** Mohammed, for whatever reason, said, "What are

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1 you doing here?"

2 I don't know if he said, "What are you
3 doing here?" or "What are y'all doing here?"

4 And Ben responded. I believe he said,
5 "Your boy" -- "your boy Watts" or "your boy."

6 And then he held -- Mohammed held his head
7 down and was just shaking -- shaking his head side to
8 side.

9 Q. What happened next?

10 A. We were sitting down on a bench where people
11 were already sitting in handcuffs, and we were -- I
12 believe that we were handcuffed to the bench, too. I
13 know that I was taken to -- escorted into a office. I
14 was being searched. And as I was being searched and
15 disclothing, Watts came in.

16 Q. So you were --

17 A. And he --

18 Q. I'm sorry. Keep going. I didn't mean to
19 interrupt.

20 A. Uh-uh. Go ahead.

21 Q. I'm just trying to clarify what was happening
22 at the time.

23 Did you say disclothed? Was your
24 cloth- -- you had to take your clothing off?

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1 **A.** Yes.

2 **Q.** Okay. What state of undress were you in when
3 Watts came in?

4 **A.** I had my shirt off and -- I had my shirt off
5 and I was attempting to take the bottoms off, my bottom
6 clothing off. But he came in. And the female officer
7 said she was doing a search. He -- I believe he said
8 okay. I'm not a hundred percent sure.

9 He still continued to do whatever he was
10 doing, which was, I believe, grabbing some paper. I
11 don't know what he was doing, but he eventually left
12 after he finished doing whatever he needed to do, out of
13 the room.

14 **Q.** How long was he in the room with the two of
15 you for?

16 **A.** A matter of seconds, I would say.

17 **Q.** Did it appear to you that this was his office
18 that you were being searched in? Or could you tell what
19 type of -- what kind of room you were in?

20 **A.** A room with a desk. So it was like a -- I
21 assume it was like a private office.

22 **Q.** After he left, did the female officer continue
23 the search?

24 **A.** Yes, ma'am.

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1 Q. Okay. You were alone with her in this room?

2 A. After that time, yes.

3 Q. And prior to him entering the room as well?

4 A. Correct. Yes.

5 Q. Do you know how long total, in total, you were
6 alone with her in that office?

7 A. After Watts left out, she just told me to --
8 to get back dressed, and that was the end of -- end of
9 the searching.

10 Q. Ben was not in the police car -- the same
11 police car as you when you were driving to 51st and
12 Wentworth, correct?

13 A. Correct.

14 Q. Was the female officer one -- was she the only
15 officer that drove you to 51st and Wentworth?

16 A. It was two female officers.

17 Q. Okay. Did you tell them what you'd observed
18 Watts do on the --

19 A. No.

20 Q. -- trip from the scene to the police station?

21 A. No.

22 Q. When the female officer was searching you in
23 that office, did you tell her at any time what you'd
24 observed Watts do?

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1 **A.** No.

2 **Q.** After you got your clothes back on, I assume
3 that you exited that office with the female officer?

4 **A.** Yes.

5 **Q.** Where did you go?

6 **A.** Back to the bench where the other arrestees
7 were.

8 **Q.** How long were you on that bench for?

9 **A.** I can't recall.

10 **Q.** What happened as you were sitting on that
11 bench?

12 **A.** I saw Watts having paper in his hand and was
13 telling the officers -- he was going to different
14 officers that were sitting at their desk to type -- he
15 was instructing them what to type on this paper. He was
16 giving them the paper.

17 And then when it was Mohammed turn to
18 type, Watts stated -- um, I believe he said, "Don't ask
19 me any questions" or "Don't ask me to do anything."
20 Basically, don't talk to him. And I was assuming --
21 assuming that he was talking to the arrestees. He did
22 not direct it to anyone. He was speaking out loud.

23 He actually after -- while Mohammed was
24 typing or whatever, he came in front of this male with

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1 what appeared to be the same narcotics bag that he gave
2 me and asked him did he want to -- asked him did he want
3 to claim this. "Do you want to claim this? Is this
4 yours?"

5 And the guy was like, "No. I ain't seen
6 that" or something. He didn't claim it, the narcotics.
7 And he just said okay. And -- he didn't even say okay.
8 I think he left it alone and made him -- I'm not for
9 sure. I can't recall.

10 And then the officers were kind of fussing
11 at Mohammed because he was slow typing and he was just
12 taking forever. Watts had to go watch this Bears
13 football game that he was missing because Mohammed
14 dumb ass. That's what he said.

15 **Q.** What happened after this exchange occurred?

16 **A.** After what exchange occurred? I'm sorry.

17 **Q.** Between Watts, Mohammed, Watts waving the
18 drugs in front of the other arrestee, Watts complaining.
19 What happened next?

20 **A.** He was just -- I feel that he was just
21 standing around waiting on Mohammed to finish typing up.

22 **Q.** Did Mohammed eventually finish typing up the
23 report?

24 **A.** Yes, ma'am.

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1 **Q.** After he finished typing up the report, what
2 happened?

3 **A.** I'm assuming. I don't recall. I don't know
4 if he told him to sign it or they had to sign it. I
5 don't know. And then we had to go -- we had to get up.
6 I know I got up. I think I kind of spaced out.

7 But I had to get up. And I went to the
8 back where you have to empty your pockets. There's some
9 officers behind a cage. You have to empty your pockets.
10 And that's when I did make a comment that I did not do
11 this.

12 **Q.** Did you make this comment to -- to whom?

13 **A.** Whoever was listening, but especially to those
14 officers that were behind this cage.

15 **Q.** So these were the lockup keepers, essentially,
16 that you said that you didn't do it?

17 **A.** I assume. I've never been locked up or held
18 or anything.

19 **Q.** What did they say, if anything, when you told
20 them that?

21 **A.** Nothing.

22 **Q.** Did you stay in that cage overnight?

23 **A.** Yes.

24 **Q.** Were you with other arrestees during that

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1 time?

2 **A.** Yes.

3 **Q.** Were the men separated from the women?

4 **A.** Yes.

5 **Q.** The next morning, where did you go?

6 MR. TEPFER: Do you need a break?

7 THE WITNESS: No. I'm going to finish. I
8 apologize.

9 BY THE WITNESS:

10 **A.** We went to the Cook County courthouse. We
11 were -- I was transferred in a -- I guess a paddy wagon
12 or -- a paddy wagon and taken to the court, 26th and
13 California.

14 BY MS. OLIVIER:

15 **Q.** Did you have an opportunity to call anyone
16 between when you were arrested to when you were brought
17 to the courthouse?

18 **A.** Yes, I did.

19 And I apologize.

20 After -- as I was coming in the back and
21 the officers were in this cage, I was escorted into
22 another section on 51st and Wentworth. And a female
23 officer had to take -- I think my laces out of my shoes
24 and some -- she asked personal questions and then asked

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1 did I want to make a phone call. She allowed me to make
2 a phone call.

3 Q. Who was your phone call to?

4 A. My sister.

5 Q. What did you say to your sister at the time?

6 A. That I'm locked up and Watts locked me up.

7 Q. Were you able to tell her what you saw?

8 A. No, ma'am.

9 Q. What did she say in response to what you were
10 telling her?

11 A. She was going to come and get me. Then the
12 officer -- I told her. I asked her. And she said no.
13 That I would go to court tomorrow -- tomorrow. And she
14 told me the room that I would be going to.

15 Q. The next day, when -- it was in bond court
16 that you went to the next morning?

17 A. Actually, we went in front of Judge Michael P.
18 Toomin.

19 Q. Did you recognize or know Judge Toomin at this
20 time in December of 2005?

21 A. Yes.

22 Q. And this is directly after you were arrested?

23 A. After we went to -- we went to -- no. No.
24 After the county, I went in front of this camera for

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1 bond. I apologize. I went for bond. And I forgot. I
2 had to pay a percentage because of the amount of drugs
3 Watts gave me.

4 Q. So they give you a D-bond where you had to
5 actually pay a percentage of the dollar amount that they
6 placed?

7 A. I had to pay a percentage, yes.

8 Q. Do you remember how much it was?

9 A. No.

10 Q. Do you remember what Ben -- well, I assume
11 that Ben had his bond placed as well?

12 A. Afterwards I learned, yes.

13 Q. Did you learn what his bond was for the
14 charges related to this December 11th arrest?

15 A. I believe that it was a hold on him. And then
16 he had to go in front of Judge Toomin.

17 Q. Do you recall the amount that was the
18 percentage of the bond that had to be paid in order for
19 you to be released?

20 A. For myself?

21 Q. Yes.

22 A. I said no. I don't remember.

23 Q. You don't? Okay.

24 Do you know who paid it?

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1 **A.** My family.

2 **Q.** And when you say your family, who are you
3 referring to specifically?

4 **A.** I know my sister. So probably -- probably
5 just my sister. I didn't ask. It wasn't no questions
6 about that.

7 **Q.** Were you released that day on December 12th,
8 2005?

9 **A.** I was bonded out, yes, ma'am.

10 **Q.** What happened after you were bonded out?

11 **A.** I got in my sister's vehicle. My mother was
12 with her. And I just cried.

13 **Q.** When was the next time you saw Ben after you
14 were released on December 12th, 2005?

15 **A.** The next day.

16 **Q.** December 13th?

17 **A.** Yes, ma'am.

18 In Judge Toomin courtroom.

19 **Q.** What took place before Judge Toomin?

20 **A.** I believe he asked him, basically, like, what
21 is he doing here. And Ben said these thing officers,
22 they got -- they got me and -- and my wife.

23 **Q.** Who was representing Ben at this hearing
24 before -- or this court date before Judge Toomin?

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1 **A.** I believe it was Mahoney, Matthew Mahoney, I
2 believe.

3 **Q.** How did you and -- or how did Ben get
4 connected with Matt Mahoney?

5 **A.** I don't know.

6 **Q.** Had Mr. Mahoney been representing Ben on prior
7 arrests and cases?

8 **A.** Yes, ma'am.

9 **Q.** Had you spoken with Matt Mahoney before your
10 arrest with Ben on December 11, 2005?

11 **A.** I don't recall.

12 **Q.** Is it -- so it is possible that the first time
13 you might have spoken with Matt Mahoney was this court
14 date before Judge Toomin where he was representing Ben
15 related to this December arrest?

16 **A.** I know that when he was -- the times that he
17 was representing Ben that before court and after court,
18 he would brief me on what was actually happening and
19 what was actually being said and the next steps of what
20 was -- should be taking place.

21 **Q.** Did you and Ben speak with Mr. Mahoney
22 about Watts and things that had been happening at the
23 527 building prior to this December arrest?

24 **A.** Ben did, yes.

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1 **Q.** Did you, though, speak with Mr. Mahoney prior
2 to your December 2005 arrest about Watts?

3 **A.** I don't know if I told him. I don't remember.
4 I don't remember.

5 MS. OLIVIER: Josh?

6 MR. TEPFER: Yes?

7 MS. OLIVIER: I think we're at the seven-hour
8 mark, just by my calculation.

9 And I will put on the record I'm not done
10 with my questioning at this juncture. I still
11 would like to go over with her her -- Ben's
12 March 23rd arrest, the search that was performed on
13 October 12th, 2005, her damages that she's
14 claiming, and some of the reporting and outcries
15 that she made as well.

16 I do not expect my questioning to take an
17 additional seven hours, but I would be joining with
18 the other defense counsel in seeking additional
19 time on another day to depose Ms. Glenn.

20 MR. TEPFER: Okay. I mean, we're going to
21 have to take it up another time. I'm not agreeing.

22 MS. OLIVIER: Sure.

23 MR. TEPFER: You chose how you wanted to use
24 your time.

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1 I will agree to allow any time that --
2 when Terry and I were talking on the record, if
3 that was counted. So if that gives an additional
4 three to five minutes now, you can use that.
5 Because I don't want to say that I didn't give you
6 your full seven hours when I did that, but --

7 So if the video -- videographer wants to
8 give you that time, that's fine. But, otherwise,
9 we'll be done.

10 MR. KOSOKO: Can we go off the record, please,
11 and find out exactly how much time has elapsed?

12 THE VIDEOGRAPHER: Sure.

13 We are now going off the record at
14 5:45 p.m.

15 (The following proceedings were
16 stenographically reported off the video
17 record:)

18 THE VIDEOGRAPHER: We've been on the record
19 for 6 hours and 55 minutes.

20 THE REPORTER: Do you want this on --

21 THE VIDEOGRAPHER: Exactly 6 hours, 54
22 minutes, and 56 seconds.

23 THE REPORTER: Excuse me. Do you want this on
24 the stenographic record?

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1 MS. OLIVIER: We can go back on.

2 Josh, you're muted.

3 MR. TEPFER: I just realized that. Sorry.

4 We can go ten more minutes.

5 THE VIDEOGRAPHER: Do you want to go back on
6 the record?

7 MR. TEPFER: We can go ten more minutes.

8 MR. PALLES: Ten more minutes, Josh, that's
9 like -- you're --

10 THE VIDEOGRAPHER: All right. One moment.
11 One --

12 MR. TEPFER: More than --

13 THE VIDEOGRAPHER: -- moment, please.

14 MR. TEPFER: Seven hours.

15 So we'll go ten minutes, and then we can
16 revisit it tomorrow morning.

17 ELECTRONIC VOICE: Recording in progress.

18 MR. PALLES: There's no point in going ten
19 minutes. Is that supposed to show you're
20 reasonable when you go to seven hours and three
21 minutes, when half of us haven't even had a chance
22 to ask her one question?

23 MR. TEPFER: Eric, I'm not arguing with you on
24 the record about this.

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1 MR. PALLES: Fine. Then I --

2 MR. TEPFER: Your choice how you wanted to use
3 your time. We'll talk about it tomorrow. The
4 Civil Rules of Procedures say the deponent gets --
5 can be deposed for up to seven hours. So --

6 MR. PALLES: Right. Okay.

7 MR. TEPFER: I've explained I'll give you ten
8 more minutes. If you don't want it, then we can
9 stop.

10 MR. PALLES: Okay. I would propose that we
11 stop. I don't -- you know, I'll --

12 MS. OLIVIER: I'm --

13 MR. PALLES: There are four --

14 MS. OLIVIER: I'm not going --

15 MR. PALLES: -- other defense counsel.

16 MS. OLIVIER: -- to be able to get through --
17 I have substantial questions that are remaining.
18 We can discuss Hale & Monico's position on why we
19 need additional time off the record tomorrow. But
20 for an -- an additional ten minutes is not going to
21 make a difference.

22 And if it's going to have to be something
23 that we're litigating, we can litigate it. I don't
24 think the ten minutes is going to make a difference

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1 substantially either way. So --

2 MR. TEPFER: Okay. I'm just stating on the
3 record that I'm not agreeing to bring her back for
4 ten more minutes on another date, but --

5 THE VIDEOGRAPHER: Excuse me, Counsel. I'm
6 not recording yet. I haven't put us back on the
7 record yet. Would you --

8 MS. OLIVIER: Mary, have you been taking --

9 THE VIDEOGRAPHER: Unless Mary is doing it.
10 Unless Mary is.

11 MS. OLIVIER: Mary?

12 THE REPORTER: (Indicating.)

13 MS. OLIVIER: That's fine. This doesn't need
14 to be on the video record.

15 MR. TEPFER: That's fine.

16 Okay. So we'll talk tomorrow, I guess, if
17 that's it.

18 MR. PALLES: Yeah. I'll try -- I'll reach out
19 to you. Obviously, the defense lawyers will talk
20 and figure out a time that we're available, and
21 we'll reach out to you.

22 Okay, Josh?

23 MR. TEPFER: Sounds good. Thank you. Have a
24 good night.

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(Back on the video record.)

THE VIDEOGRAPHER: This is the end of the deposition. This is the end of today's testimony. The time is 5:48 p.m., and the running length of this deposition is 6 hours, 56 minutes -- I'm sorry -- 6 hours and 57 minutes exactly.

We are now off the record.

(WHEREUPON, the deposition adjourned at 5:50 p.m., pursuant to the positions of the respective parties.)

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REPORTER'S CERTIFICATE

I, Mary T. Murphy McGuirk, a Certified Shorthand Reporter of the State of Illinois, do hereby certify that the foregoing was reported via videoconference by stenographic and mechanical means, which matter was held on the date, and at the time and place set out on the title page hereof, and that the foregoing constitutes a true and accurate transcript of same.

I further certify that I am not related to any of the parties, nor am I an employee of or related to any of the attorneys representing the parties, and I have no financial interest in the outcome of this matter.

IN WITNESS WHEREOF, I do hereunto set my hand in Tinley Park, Illinois, this 15th day of September, 2021.

Mary T. Murphy-McGuirk



Mary T. Murphy McGuirk
Certified Shorthand Reporter
CSR Certificate No. 84-4160