

# **EXHIBIT 9**



Transcript of the Deposition of  
**Antwan Bradley**

**Case:** In Re: Watts Coordinated Pretrial Proceedings  
**Taken On:** December 21, 2023

Royal Reporting Services, Inc.  
Phone: 312.361.8851  
Email: [info@royalreportingservices.com](mailto:info@royalreportingservices.com)  
Website: [www.royalreportingservices.com](http://www.royalreportingservices.com)

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

In re: WATTS COORDINATED )  
PRETRIAL PROCEEDINGS ) Case No. 19 cv 1717  
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The videotaped deposition of ANTWAN BRADLEY taken via videoconference, called by the Defendants for examination, pursuant to notice and pursuant to the Federal Rules of Civil Procedure for the United States District Courts pertaining to the taking of depositions, taken before Emma Sheehy, Certified Shorthand Reporter within and for the County of Cook and State of Illinois, commencing at the hour of 11:04 a.m. on the 21st day of December, 2023.

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1 APPEARANCES (via videoconference):

2 KENNETH N. FLAXMAN, P.C.

MR. JOEL A. FLAXMAN

3 200 South Michigan Avenue, Suite 201

Chicago, Illinois 60604

4 312.427.3200

jaf@kenlaw.com

5

On behalf of Coordinated Plaintiffs;

6

7 LOEJVY & LOEJVY

MS. THERESA H. KLEINHAUS

8 311 North Aberdeen Street, 3rd Floor

Chicago, Illinois 60607

9 312.243.5900

tess@loevy.com

10

On behalf of Coordinated Plaintiffs;

11

12 HALE & MONICO, LLC

MR. WILLIAM E. BAZAREK

13 53 West Jackson Boulevard, Suite 334

Chicago, Illinois 60604

14 312.341.9646

web@halemonico.com

15

On behalf of Individual Defendants;

16

17 JOHNSON & BELL, LTD.

MR. BRIAN P. GAINER

18 MS. LISA M. MCELROY

33 West Monroe Street, Suite 2700

19 Chicago, Illinois 60603

312.372.0770

20 gainerb@jbltd.com

mcelroyl@jbltd.com

21

On behalf of the Defendant,

22 Ronald Watts;

23

24

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1 APPEARANCES (via videoconference) CONT'D:

2 REITER BURNS  
3 MS. DHAVIELLA R. HARRIS  
311 South Wacker Drive, Suite 5200  
Chicago, Illinois 60606  
4 312.982.0090  
dharris@reiterburns.com

5 On behalf of Coordinated Defendants;

7 MOHAN GROBLE SCOLARO  
8 MR. GARY RAVITZ  
55 West Monroe Street, Suite 1600  
Chicago, Illinois 60603  
9 312.422.9999  
gravitz@daleymohan.com

10 On behalf of the Defendant,  
11 Kallatt Mohammed;

12 BORKAN & SCAHILL, LTD.  
13 MR. STEPHEN B. BORKAN  
20 South Clark Street, Suite 1700  
14 Chicago, Illinois 60603  
312.580.1030  
15 sborkan@borkanscahill.com

16 On behalf of the Defendant,  
17 Calvin Ridgell;

18 LEINENWEBER BARONI & DAFFADA, LLC  
19 MR. JAMES V. DAFFADA  
120 North LaSalle Street, Suite 2000  
Chicago, Illinois 60602  
20 866.786.3705  
jim@ilesq.com

21 On behalf of the Defendants,  
22 Mathew Cadman and Michael Spaargaren.

23 ALSO PRESENT:

24 Michael Keehna, Videographer.

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<p style="text-align: right;">Page 5</p> <p>1        THE VIDEOGRAPHER: For the record, this is 2        Michael Keehna of Video Instanter. I'm the video 3        device operator for this deposition. Our business 4        address is 134 North LaSalle Street, Suite 1400, 5        Chicago, Illinois 60602.</p> <p>6        This deposition is being video recorded 7        pursuant to Federal Rules of Procedure. The 8        deposition for Antwan Bradley. Today's date is 9        December 21, 2023, and the time is 11:05 a.m. 10      Taken in the Watts Coordinated Pretrial Proceedings, 11      case number 19 CV 1717, United States District Court 12      for the Northern District of Illinois, Eastern 13      Division.</p> <p>14      Will the witness please identify yourself 15      for the record by stating your name and location, 16      please.</p> <p>17      THE WITNESS: My first name, Antwan. 18      Last name, Bradley.</p> <p>19      THE VIDEOGRAPHER: This deposition is being 20      video recorded --</p> <p>21      THE WITNESS: The location I'm at --</p> <p>22      THE VIDEOGRAPHER: Oh, I'm sorry.</p> <p>23      MR. FLAXMAN: We're having a real hard time 24      hearing the video recorder. There's some kind of echo</p>	<p style="text-align: right;">Page 7</p> <p>1        EXAMINATION 2        BY MR. BAZAREK: 3        <b>Q. Good morning, Mr. Bradley.</b> 4        A. Good morning. How you doing? 5        <b>Q. I'm doing well. My name is William Bazarek,</b> 6        <b>and I represent a number of police officers in these</b> 7        <b>cases that are related to Ron Watts and his team.</b> 8        <b>So I'm going to be asking you questions</b> 9        <b>today not about the lawsuit that you're filing, but</b> 10      <b>I'm going to be asking you other questions about other</b> 11      <b>events that occurred at Ida B. Wells.</b> 12      <b>So a couple ground rules. It's important</b> 13      <b>today that you let me finish my question before you</b> 14      <b>answer, or we're going to be talking over each other,</b> 15      <b>okay?</b> 16      A. Yes. 17      <b>Q. And it's also important -- I only want you to</b> 18      <b>answer questions that you understand. So if I ask you</b> 19      <b>a question and you don't understand it, can you let me</b> 20      <b>know?</b> 21      A. Yes. 22      <b>Q. And would you -- do you agree that you'll</b> 23      <b>only answer questions today that you understand?</b> 24      A. Yes.</p>
<p style="text-align: right;">Page 6</p> <p>1        with his voice.</p> <p>2        THE VIDEOGRAPHER: Can you hear me now?</p> <p>3        MR. FLAXMAN: We can, but you're very quiet.</p> <p>4        MR. BAZAREK: Is there some glitch?</p> <p>5        MR. FLAXMAN: I mean, we'll make do if we 6        can hear him. Why don't you get started.</p> <p>7        MR. BAZAREK: Yeah. I mean, it did sound 8        kind of like it was coming through a tin can listening 9        to it. I agree.</p> <p>10      MR. FLAXMAN: Yeah. I mean, you sound fine, 11      though, so I --</p> <p>12      MR. BAZAREK: Okay. Well, that's all that's 13      important, really.</p> <p>14      All right. Can we swear our witness in?</p> <p>15      Are we ready to go, or what are we doing? Or -- I'm 16      sorry. Do we need to announce where we are -- all 17      the -- all the different counsel for the parties or 18      not? The videographer? All right. Let's just swear 19      the -- swear the witness in, please.</p> <p>20      (Witness duly sworn.)</p> <p>21      ANTWAN BRADLEY, 22      called as a witness herein, having been first duly 23      sworn, was examined and testified via 24      videoconference as follows:</p>	<p style="text-align: right;">Page 8</p> <p>1        <b>Q. Anytime today, Mr. Bradley, you want to take</b> 2        <b>a break or whatever, just let us know, and you can do</b> 3        <b>so, okay?</b> 4        A. Yes. 5        MS. MCELROY: I'm so sorry to interrupt. 6        Brian Gainer is in the waiting room if the court 7        reporter -- here he is. Okay. Thank you. 8        BY MR. BAZAREK: 9        <b>Q. Okay. And could you spell your first name?</b> 10      A. A-N-T-W-A-N. 11      <b>Q. And do you have a middle name?</b> 12      A. Edward, E-D-W-A-R-D. 13      <b>Q. I heard an echo. I'm sorry. Could you say</b> 14      <b>that again?</b> 15      A. Edward. Edward. 16      <b>Q. Edward?</b> 17      A. Edward, E-D-W-A-R-D. 18      <b>Q. Oh, Edward. Okay.</b> 19      A. Yeah. 20      <b>Q. My middle name too. All right. And then --</b> 21      A. That's my middle name. 22      <b>Q. And then spell your last name.</b> 23      A. B-R-A-D-L-E-Y. 24      <b>Q. And, sir, what year were you -- what's your</b></p>

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<p>1     <b>birthday?</b></p> <p>2     A. 11/20/1989.</p> <p>3     <b>Q. Do you have any nicknames?</b></p> <p>4     A. Yes.</p> <p>5     <b>Q. What are your nicknames?</b></p> <p>6     A. My nickname is Tawny.</p> <p>7     <b>Q. And then how do you spell Tawny?</b></p> <p>8     A. T-A-W-N-Y.</p> <p>9     <b>Q. T-A-W-N-Y?</b></p> <p>10    A. Yes.</p> <p>11    <b>Q. Okay. And have you -- how long have you been known by that nickname?</b></p> <p>12    A. Majority of my whole life.</p> <p>13    <b>Q. What -- how did you get that nickname?</b></p> <p>14    A. Friends.</p> <p>15    <b>Q. Hey, you know, I'm having trouble seeing your full face.</b></p> <p>16    MR. BAZAREK: Is the video recorder getting that?</p> <p>17    MR. FLAXMAN: I'll push the tablet back a little. Is that better?</p> <p>18    MR. BAZAREK: Yes.</p> <p>19    BY MR. BAZAREK:</p> <p>20    <b>Q. So you -- you got the nickname from friends?</b></p>	<p>1     A. No.</p> <p>2     <b>Q. What do you call him?</b></p> <p>3     A. I mean, I take that back. I -- I don't call him Gregory Young. I call him by the nickname you just said, Bebe.</p> <p>4     <b>Q. And then -- how do you spell Bebe; do you know?</b></p> <p>5     A. No.</p> <p>6     <b>Q. So in this deposition, do you want me to refer to Gregory Young as Bebe? Is that easier for you?</b></p> <p>7     A. Yes.</p> <p>8     <b>Q. Okay. Bebe is many years older than you, correct?</b></p> <p>9     A. Yes.</p> <p>10    <b>Q. Bebe, I believe he's going to turn 60 next year.</b></p> <p>11    <b>Does that sound right?</b></p> <p>12    A. I don't know.</p> <p>13    <b>Q. Okay. And tell me -- when did you first meet Bebe?</b></p> <p>14    A. I really can't recall. I met him in grammar school.</p> <p>15    <b>Q. And were you -- you were friends with his</b></p>
<p>1     A. Yes, I got it from my friends.</p> <p>2     <b>Q. Okay. And then how old were you when you first got that nickname?</b></p> <p>3     A. I can't recall.</p> <p>4     <b>Q. And what does that -- what does that mean, Tawny?</b></p> <p>5     A. It's just a nickname that they gave me.</p> <p>6     <b>Q. Okay. Do you know someone named Gregory Young?</b></p> <p>7     A. Yes.</p> <p>8     <b>Q. Does Gregory Young have a nickname?</b></p> <p>9     A. Not that I know of.</p> <p>10    <b>Q. How old is Gregory Young?</b></p> <p>11    A. I don't -- I don't know.</p> <p>12    <b>Q. How do you know Gregory Young?</b></p> <p>13    A. I went to school with his son.</p> <p>14    <b>Q. What's his son's name?</b></p> <p>15    A. Keith Owens.</p> <p>16    <b>Q. Is Keith Owens deceased?</b></p> <p>17    A. No.</p> <p>18    <b>Q. Gregory Young, does he have a nickname of Bebe?</b></p> <p>19    A. Yes. I think that's his nickname.</p> <p>20    <b>Q. Is that what you call Gregory Young?</b></p>	<p>1     <b>son, Keith Owens?</b></p> <p>2     A. Yes.</p> <p>3     <b>Q. Is Keith Owens one of your best friends?</b></p> <p>4     A. No.</p> <p>5     <b>Q. When's -- when -- let me ask you this. When was the last time you had any contact with Keith Owens?</b></p> <p>6     A. I have -- since they moved, I haven't seen them in a while.</p> <p>7     <b>Q. And when you say "they moved," when was that?</b></p> <p>8     A. When the projects got tore down.</p> <p>9     <b>Q. And when you say "the projects," are you talking about the buildings at Ida B. Wells?</b></p> <p>10    A. Yes.</p> <p>11    <b>Q. Did you ever live in Ida B. Wells?</b></p> <p>12    A. Yes.</p> <p>13    <b>Q. Where did you live at Ida B. Wells?</b></p> <p>14    A. I stayed in the row houses on 38th and Vincennes.</p> <p>15    <b>Q. Who did you live with there?</b></p> <p>16    A. My mother, father, and brothers and sisters.</p> <p>17    <b>Q. Did you ever live in the extensions?</b></p> <p>18    A. No.</p> <p>19    <b>Q. What are the extensions?</b></p>

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<p>1       A. It's another side of the projects. It's just 2       the high-rise buildings.</p> <p>3       <b>Q. Did you go to school in the area of 4       Ida B. Wells?</b></p> <p>5       A. Yes.</p> <p>6       <b>Q. Where did you attend school?</b></p> <p>7       A. I attended Doolittle East.</p> <p>8       <b>Q. Have you ever been inside the 527 building 9       at Ida B. Wells?</b></p> <p>10      A. Yes.</p> <p>11      <b>Q. And what would -- you did not reside there, 12       though, correct?</b></p> <p>13      A. No.</p> <p>14      <b>Q. So what -- what would bring you to the 15       527 building during the time when you lived in the 16       area of Ida B. Wells?</b></p> <p>17      A. Friends.</p> <p>18      <b>Q. Who were -- so your friends, did they -- 19       they lived in that building, or they just hung out 20       at that building?</b></p> <p>21      A. My friend, Keith Owens, lived in that 22       building.</p> <p>23      <b>Q. Is Keith Owens a drug dealer?</b></p> <p>24      A. No.</p>	<p>1       <b>Q. Have you ever run from the police?</b></p> <p>2       A. Yes.</p> <p>3       <b>Q. Did you ever run from the police while you 4       were inside the 527 building at Ida B. Wells?</b></p> <p>5       A. No.</p> <p>6       <b>Q. Did you ever have any contact with any police 7       officer while inside the 527 building at Ida B. Wells?</b></p> <p>8       A. No.</p> <p>9       <b>Q. At any time when you were in the 527 building 10       at Ida B. Wells, did you possess cocaine?</b></p> <p>11      A. No.</p> <p>12      <b>Q. At any time when you were inside the 13       527 building, did you ever possess heroin?</b></p> <p>14      A. No.</p> <p>15      <b>Q. Do you know a Chicago police officer named 16       Douglas Nichols?</b></p> <p>17      A. I can't recall.</p> <p>18      <b>Q. At any time when you were in the 19       527 building, did you ever observe a Chicago police 20       officer when -- strike that.</b></p> <p>21      <b>Were -- were you ever with Bebe inside the 22       527 building at Ida B. Wells?</b></p> <p>23      A. No.</p> <p>24      <b>Q. Have you ever seen Bebe inside the</b></p>
<p>Page 14</p> <p>1       <b>Q. Did you have any other friends other than 2       Keith Owens who lived in that building?</b></p> <p>3       A. No.</p> <p>4       <b>Q. Do you know an individual named Ben Baker?</b></p> <p>5       A. I know of Ben Baker.</p> <p>6       <b>Q. How do you know of Ben Baker?</b></p> <p>7       A. I know Ben Baker from the extensions.</p> <p>8       <b>Q. He lived in the 527 building, right?</b></p> <p>9       A. Not for sure if he did.</p> <p>10      <b>Q. Do you know Ben Baker's ex-wife, 11       Clarissa Glenn?</b></p> <p>12      A. No.</p> <p>13      <b>Q. Do you know any of Ben Baker's children?</b></p> <p>14      A. No.</p> <p>15      <b>Q. Did you know Ben Baker to be a drug dealer 16       at the 527 building?</b></p> <p>17      A. No.</p> <p>18      <b>Q. At the 527 building, did you know anyone 19       named Winky who sold nachos?</b></p> <p>20      A. No.</p> <p>21      <b>Q. Have you ever observed Ben Baker with nachos?</b></p> <p>22      A. No.</p> <p>23      <b>Q. Have you ever run from the police?</b></p> <p>24      A. Can you repeat that again?</p>	<p>Page 16</p> <p>1       <b>527 building at Ida B. Wells?</b></p> <p>2       A. Yes.</p> <p>3       <b>Q. And when -- when was that?</b></p> <p>4       A. I can't remember.</p> <p>5       <b>Q. Do you remember what the circumstances were 6       when you saw Bebe inside the 527 building?</b></p> <p>7       A. No.</p> <p>8       <b>Q. Did Bebe sell illegal narcotics --</b></p> <p>9       A. No.</p> <p>10      <b>Q. Let me finish. 11       Did Bebe sell illegal narcotics at the 12       527 building?</b></p> <p>13      A. No.</p> <p>14      <b>Q. Did Bebe sell any narcotics at any time at 15       Ida B. Wells?</b></p> <p>16      A. No.</p> <p>17      <b>Q. Have you ever observed Bebe with heroin?</b></p> <p>18      A. No.</p> <p>19      <b>Q. Did you ever play dice inside the 20       527 building at Ida B. Wells?</b></p> <p>21      A. No.</p> <p>22      <b>Q. Was there ever an occasion where a police 23       officer approached you and Bebe at the same time?</b></p> <p>24      A. No.</p>

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<p>1       <b>Q. At any time, were you ever with Bebe and</b>  2       <b>Ben Baker was also present?</b>  3        A. No.  4       <b>Q. At any time, did -- have you ever observed</b>  5       <b>Ben Baker run from the police?</b>  6        A. No.  7       <b>Q. At any time, have you ever observed Bebe run</b>  8       <b>from the police?</b>  9        A. No.  10       <b>Q. During 2005, did you ever have any</b>  11       <b>interactions with any member of Ron Watts's tactical</b>  12       <b>team?</b>  13        MS. KLEINHAUS: Objection to form;  14        foundation.  15        THE WITNESS: No.  16        BY MR. BAZAREK:  17       <b>Q. During 2005, did you ever engage in illegal</b>  18       <b>narcotics activity?</b>  19        A. No.  20       <b>Q. Have you ever sold narcotics to anyone at</b>  21       <b>any time?</b>  22        A. No.  23       <b>Q. Have you ever possessed illegal narcotics</b>  24       <b>at any time?</b></p>	<p>1       and big enough than the kids in my class, so they  2       automatically pushed me to the next grade.  3       <b>Q. And when you say "next grade," you meant to</b>  4       <b>high school?</b>  5        A. Yes.  6       <b>Q. And how long did you attend -- well, when</b>  7       <b>they pushed you up to the next grade, what grade were</b>  8       <b>you in before they pushed you up?</b>  9        A. I was in 8th grade and moved to 9th.  10       <b>Q. Okay. All right. So 9th grade, you're</b>  11       <b>a freshman in high school, right?</b>  12        A. Yes.  13       <b>Q. And then did you complete your sophomore</b>  14       <b>year at Phillips as well?</b>  15        A. No.  16       <b>Q. Why did you leave Phillips High School?</b>  17        A. I think -- I left Phillips High School --  18        I got kicked out. I had to go to an alternative  19        school.  20       <b>Q. What did you get kicked out for?</b>  21        A. Fighting.  22       <b>Q. Did someone get hurt?</b>  23        A. No.  24       <b>Q. Have you ever been in a gang?</b></p>
<p style="text-align: center;">Page 18</p> <p>1       A. No.  2       <b>Q. Were you -- were you born -- strike that.</b>  3        <b>Growing up, your child -- you know, you're</b>  4       <b>born; you live with your family.</b>  5        <b>Did you always live in the row houses when</b>  6       <b>you resided at Ida B. Wells?</b>  7        A. Yes.  8       <b>Q. I want to just focus on the year 2005.</b>  9        <b>So in 2005, you would have been 16?</b>  10       A. Yes. I think so.  11       <b>Q. And so were you in high school at the time</b>  12       <b>in 2005?</b>  13       A. I can't recall.  14       <b>Q. Where did you go to high school?</b>  15       A. Wendell Phillips.  16       <b>Q. What year did you first attend</b>  17       <b>Wendell Phillips?</b>  18       A. I can't recall what year.  19       <b>Q. What year did you graduate from grammar</b>  20       <b>school?</b>  21       A. I don't remember.  22       <b>Q. Well, did you graduate from grammar school</b>  23       <b>when you were 14?</b>  24       A. I really didn't graduate. I was older</p>	<p style="text-align: center;">Page 20</p> <p>1       A. No.  2       <b>Q. Did you ever hear of a gang called the</b>  3       <b>Gangster Disciples?</b>  4        A. Yes.  5       <b>Q. Who are the Gangster Disciples?</b>  6        A. I really can't say who they are.  7       <b>Q. Did you have friends in the area of</b>  8       <b>Ida B. Wells that were Gangster Disciples?</b>  9        A. No.  10       <b>Q. If you know -- and I know you're not a --</b>  11       <b>or strike that.</b>  12       <b>Did you ever report to any police officer</b>  13       <b>that you were in a gang?</b>  14       A. No.  15       <b>Q. Do you have any tattoos?</b>  16       A. Yes.  17       <b>Q. What -- what tattoos do you have and where</b>  18       <b>on your body?</b>  19       A. I have one tattoo on my forearm, and I have  20       my kid's name.  21       <b>Q. Any other tattoos?</b>  22       A. No.  23       <b>Q. To your knowledge, did Gangster Disciples</b>  24       <b>control narcotics activity at Ida B. Wells?</b></p>

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<p style="text-align: center;">Page 21</p> <p>1       A. I don't know.</p> <p>2       <b>Q. At any time during the years that you</b> 3       <b>lived at Ida B. Wells, did you ever observe what you</b> 4       <b>believed to be illegal narcotics activity?</b></p> <p>5       A. Yes.</p> <p>6       <b>Q. Would you observe that activity at the</b> 7       <b>527 building at Ida B. Wells?</b></p> <p>8       A. No.</p> <p>9       <b>Q. Where would -- where would you observe</b> 10      <b>the illegal narcotics activity at Ida B. Wells?</b></p> <p>11      A. Through the projects.</p> <p>12      <b>Q. Were -- did you observe the illegal narcotics</b> 13      <b>activity at particular buildings or where exactly?</b></p> <p>14      A. Just outside the area.</p> <p>15      <b>Q. And when you say "outside the area,"</b> 16      <b>would that be outside some of the buildings?</b></p> <p>17      A. Yes.</p> <p>18      <b>Q. And would the illegal narcotics activity</b> 19      <b>you observed -- would it be outside of some of the</b> 20      <b>extensions?</b></p> <p>21      A. Yes.</p> <p>22      <b>Q. Was there -- was there illegal narcotics</b> 23      <b>activity going on at the row houses?</b></p> <p>24      A. Yes.</p>	<p style="text-align: center;">Page 23</p> <p>1       <b>illegal narcotics activity?</b></p> <p>2       A. Just a lot of people standing around and</p> <p>3       people screaming out stuff -- screaming out stuff.</p> <p>4       <b>Q. And the things that people were screaming</b> 5       <b>out, would that be announcing some type of drug or --</b> 6       <b>you know, heroin, cocaine, rocks, blow, something</b> 7       <b>like that?</b></p> <p>8       A. Yes.</p> <p>9       <b>Q. And do you remember what some of the --</b> 10      <b>the things that would be yelled out?</b></p> <p>11      A. No.</p> <p>12      <b>Q. And would you observe police officers in</b> 13      <b>the area trying to catch the people that were selling</b> 14      <b>drugs?</b></p> <p>15      MR. FLAXMAN: Objection, foundation.</p> <p>16      Go ahead and answer.</p> <p>17      THE WITNESS: Could you repeat the question</p> <p>18      again?</p> <p>19      BY MR. BAZAREK:</p> <p>20      <b>Q. Sure. Were there occasions where you</b> 21      <b>would observe police officers trying to apprehend the</b> 22      <b>individuals that were involved in the illegal</b> 23      <b>narcotics activity?</b></p> <p>24      A. Yes.</p>
<p style="text-align: center;">Page 22</p> <p>1       <b>Q. If you had to -- if you had to gauge where</b> 2       <b>most of the illegal narcotics activity occurred that</b> 3       <b>you observed, would it be at the extensions, or would</b> 4       <b>it be at the row houses?</b></p> <p>5       MS. KLEINHAUS: Objection, calls for</p> <p>6       speculation.</p> <p>7       You can answer.</p> <p>8       MR. BAZAREK: I said from what he observed.</p> <p>9       BY MR. BAZAREK:</p> <p>10      <b>Q. But go ahead.</b></p> <p>11      A. I'd say both.</p> <p>12      <b>Q. Equal?</b></p> <p>13      A. Yes.</p> <p>14      <b>Q. What -- what type of narcotics could --</b> 15      <b>strike that.</b></p> <p>16      So would you -- you would observe individuals</p> <p>17      that you -- appeared to be wanting to buy illegal</p> <p>18      narcotics.</p> <p>19      <b>Is that fair to say?</b></p> <p>20      A. Yes.</p> <p>21      <b>Q. And can you just describe what you would</b> 22      <b>see that would let you -- strike that.</b></p> <p>23      <b>Could you describe what you would see that</b> 24      <b>would make you think that was happening in terms of</b></p>	<p style="text-align: center;">Page 24</p> <p>1       <b>Q. And can you -- describe what you would see.</b></p> <p>2       A. Just police jumping out the car, running</p> <p>3       inside some of the project buildings.</p> <p>4       <b>Q. And were they running to where the people</b> 5       <b>were selling the narcotics?</b></p> <p>6       A. Yes.</p> <p>7       <b>Q. And then when the police would try and</b> 8       <b>apprehend the people selling narcotics, would the</b> 9       <b>people that were selling narcotics -- would they</b> 10      <b>scatter, run away?</b></p> <p>11      A. I don't know.</p> <p>12      <b>Q. And why is that that you wouldn't know?</b></p> <p>13      A. Because I would never see the people running.</p> <p>14      I would just see police officers running inside the</p> <p>15      buildings.</p> <p>16      <b>Q. Okay. Have you ever -- at any time when you</b> 17      <b>were at Ida B. Wells and you thought that -- strike</b> 18      <b>that -- and you believed to be observing illegal</b> 19      <b>narcotics activity, did you ever hear people yell</b> 20      <b>"cleanup"?</b></p> <p>21      A. No.</p> <p>22      <b>Q. Do you know what a cleanup man is?</b></p> <p>23      A. No.</p> <p>24      <b>Q. Have you ever heard that drug dealers at</b></p>

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<p style="text-align: center;">Page 25</p> <p>1    <b>Ida B. Wells would hide the narcotics that they were</b>    2    <b>trying to sell if the police were in the area?</b></p> <p>3       A. No.</p> <p>4       <b>Q. Let me go back to Ben Baker.</b></p> <p>5          <b>Have you ever spoken with Ben Baker at any</b>    6       <b>time?</b></p> <p>7          A. No.</p> <p>8          <b>Q. Do you -- have you ever heard of the phrase</b>    9       <b>"work a bundle"?</b></p> <p>10          A. No.</p> <p>11          <b>Q. Do you know any slang terms for illegal</b>    12       <b>narcotics dealing?</b></p> <p>13          A. No.</p> <p>14          <b>Q. Have you ever possessed illegal narcotics</b>    15       <b>while you were in the presence of a police officer?</b></p> <p>16          A. No.</p> <p>17          <b>Q. Have you ever discarded illegal narcotics</b>    18       <b>that you had in your hand?</b></p> <p>19          A. What you mean "discard"?</p> <p>20          <b>Q. Throw -- throw -- throw it on -- throw it</b>    21       <b>on the ground.</b></p> <p>22          A. No.</p> <p>23          <b>Q. Have you ever -- strike that.</b></p> <p>24             <b>Have you ever been in the presence of</b></p>	<p style="text-align: center;">Page 27</p> <p>1       A. Being locked up for trespasses.</p> <p>2       <b>Q. Anything else?</b></p> <p>3          A. Burglary. Residential burglary.</p> <p>4          <b>Q. And how -- how were those negative</b>    5       <b>interactions?</b></p> <p>6          A. I was going to jail for something that</p> <p>7          I didn't do.</p> <p>8          <b>Q. So when were you arrested for burglary?</b></p> <p>9          A. I can't recall exactly what -- when it --</p> <p>10       when it happened.</p> <p>11          <b>Q. Were you convicted?</b></p> <p>12          A. I pleaded guilty, yes.</p> <p>13          <b>Q. Was it -- and who arrested you; do you know?</b></p> <p>14          A. No.</p> <p>15          <b>Q. Was it any member of Ron Watts's team?</b></p> <p>16          A. No.</p> <p>17          <b>Q. And where were you when you were arrested</b>    18       <b>for the burglary?</b></p> <p>19          A. I can't recall.</p> <p>20          <b>Q. Where were you living when you were arrested</b>    21       <b>for the burglary?</b></p> <p>22          A. I was staying 76 East 37th Street, Chicago,</p> <p>23          Illinois.</p> <p>24          <b>Q. Did you go to prison?</b></p>
<p style="text-align: center;">Page 26</p> <p>1    <b>someone who possessed illegal narcotics?</b></p> <p>2       A. No.</p> <p>3       <b>Q. Have you spoken to -- strike that.</b></p> <p>4          <b>When was the last time you spoke to Bebe?</b></p> <p>5          A. Years. It's been years before I even spoke</p> <p>6       to him or even saw him.</p> <p>7          <b>Q. Did -- did -- at any time when you ever</b>    8       <b>speak with Bebe, did illegal narcotics come into the</b>    9       <b>conversation?</b></p> <p>10          A. No.</p> <p>11          <b>Q. Separate and apart from the arrest -- I know</b>    12       <b>you're bringing a lawsuit. That. But separate from</b>    13       <b>that, have you ever had any negative interactions with</b>    14       <b>a law enforcement officer?</b></p> <p>15          A. Repeat the question again.</p> <p>16          MR. BAZAREK: Can you -- can you read that</p> <p>17       one back, please, Emma?</p> <p>18          (Whereupon, the record was read as</p> <p>19          requested.)</p> <p>20          MS. KLEINHAUS: Objection to form.</p> <p>21          You can answer.</p> <p>22          THE WITNESS: Yes.</p> <p>23          BY MR. BAZAREK:</p> <p>24          <b>Q. Tell me about it.</b></p>	<p style="text-align: center;">Page 28</p> <p>1       A. No. I pleaded guilty to probation.</p> <p>2       <b>Q. Was the burglary -- were you arrested on</b>    3       <b>July 25, 2014?</b></p> <p>4          A. I can't recall.</p> <p>5          <b>Q. Well, was it in the last ten years when you</b>    6       <b>were arrested for the burglary?</b></p> <p>7          A. I think so.</p> <p>8          <b>Q. Okay. And you were arrested at</b>    9       <b>3702 South Langley, right?</b></p> <p>10          A. I don't know.</p> <p>11          <b>Q. Okay. Do you know that address,</b>    12       <b>3702 South Langley?</b></p> <p>13          A. No.</p> <p>14          <b>Q. All right. So you don't -- you don't --</b>    15       <b>you've never lived at that address?</b></p> <p>16          A. At 3702 South Langley?</p> <p>17          <b>Q. Yes.</b></p> <p>18          A. No.</p> <p>19          <b>Q. Okay. Have you ever been inside a residence</b>    20       <b>at 3702 South Langley?</b></p> <p>21          MR. FLAXMAN: I didn't -- I didn't hear what</p> <p>22       you said. Have you ever been -- what was the word?</p> <p>23          MR. BAZAREK: I thought I said "inside."</p> <p>24          MR. FLAXMAN: Oh, I didn't hear that.</p>

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<p>1     That's why I was asking to clarify. Want to just ask 2     it again?</p> <p>3     MR. BAZAREK: Yeah.</p> <p>4     BY MR. BAZAREK:</p> <p>5     <b>Q. Have you ever -- have you ever been inside</b> 6     <b>a residence at 3702 South Langley?</b></p> <p>7     A. No.</p> <p>8     <b>Q. Okay. Just briefly, what were the</b> 9     <b>circumstances of this arrest for burglary in which</b> 10     <b>you pled guilty?</b></p> <p>11     A. What you -- could you -- what you mean?</p> <p>12     <b>Q. Well, what happened? What were the</b> 13     <b>circumstances?</b></p> <p>14     A. I was with friends, and we was inside of a 15     vacant apartment just hanging out. And I guess the 16     neighbors called the police and told them somebody was 17     inside. Once the police came, they found us inside 18     and charged us for burglary.</p> <p>19     <b>Q. Okay. So it was -- it was a vacant --</b></p> <p>20     A. Yeah, but it had, like, furniture and TVs 21     and stuff still inside the house.</p> <p>22     <b>Q. Okay. And was -- was -- do you remember</b> 23     <b>if it was on Langley or some other street?</b></p> <p>24     A. No.</p>	<p>1     <b>individuals or family members, friends that you were</b> 2     <b>visiting?</b></p> <p>3     A. No. My auntie, she -- Felicia Bradley, she 4     stayed in the row house projects, but she moved from 5     there.</p> <p>6     <b>Q. How about the -- the 527 building, were you</b> 7     <b>ever arrested for trespass there?</b></p> <p>8     A. Not that I remember.</p> <p>9     <b>Q. You were arrested for trespass at the</b> 10     <b>574 building, right, and the 575 building?</b></p> <p>11     A. Yes.</p> <p>12     <b>Q. Was there narcotics dealing going on</b> 13     <b>at the 574 building and the 575 building, if you --</b> 14     <b>if you know?</b></p> <p>15     A. Yes.</p> <p>16     <b>Q. Do you know any of the drug dealers who</b> 17     <b>sold drugs out of the Ida B. Wells building?</b></p> <p>18     A. No.</p> <p>19     <b>Q. Did you ever hear of someone named</b> 20     <b>Big Shorty?</b></p> <p>21     A. Yes.</p> <p>22     <b>Q. Who's Big Shorty?</b></p> <p>23     A. I don't really know him personally, 24     but I heard his name before.</p>
<p style="text-align: center;">Page 30</p> <p>1     <b>Q. You don't know one way or another?</b></p> <p>2     A. No. I don't remember what street it was on.</p> <p>3     <b>Q. Okay. And then -- and then you talked about</b> 4     <b>these trespass arrests.</b></p> <p>5     <b>So why were those a negative experience for</b> 6     <b>you with the police?</b></p> <p>7     A. Because the trespasses I was getting locked 8     up for was in the projects which -- where I stayed at. 9     I was just hanging there because I still had family 10     and friends there. And the police just -- always 11     just locked me up because I didn't have IDs into the 12     buildings where I was at.</p> <p>13     <b>Q. Okay. But would you agree at least that</b> 14     <b>the buildings that you were at in your arrest for</b> 15     <b>trespass, you did not live there, correct?</b></p> <p>16     A. Yes. I didn't live there.</p> <p>17     <b>Q. I'm sorry. You did or did not?</b></p> <p>18     A. I did -- did not live there.</p> <p>19     <b>Q. Okay. But you would visit -- you were going</b> 20     <b>to visit friends?</b></p> <p>21     A. Yeah. My cousin.</p> <p>22     <b>Q. Okay. Who's your cousin?</b></p> <p>23     A. Nes Alonz.</p> <p>24     <b>Q. Any -- any other individuals -- any other</b></p>	<p style="text-align: center;">Page 32</p> <p>1     <b>Q. Was he a drug dealer?</b></p> <p>2     A. I can't say. I don't know.</p> <p>3     <b>Q. How about -- do you know anyone named</b> 4     <b>Patrick Noonan?</b></p> <p>5     A. No.</p> <p>6     <b>Q. How about Roy Bennett? His nickname was</b> 7     <b>Shock. Do you know him?</b></p> <p>8     A. No.</p> <p>9     <b>Q. How about Harold -- strike that.</b></p> <p>10     <b>How about Harry Seals, do you know him?</b></p> <p>11     A. No.</p> <p>12     <b>Q. Do you know an individual named Harold Owens?</b></p> <p>13     A. No.</p> <p>14     <b>Q. Do you know if Harold Owens is related to</b> 15     <b>Keith Owens?</b></p> <p>16     MR. FLAXMAN: Objection, foundation.</p> <p>17     BY MR. BAZAREK:</p> <p>18     <b>Q. If you know.</b></p> <p>19     A. No.</p> <p>20     <b>Q. Okay. Let me ask you this.</b></p> <p>21     <b>Do you know someone named Elgen Moore?</b></p> <p>22     A. No.</p> <p>23     <b>Q. How about Bryant Patrick, do you know him?</b></p> <p>24     A. No.</p>

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<p>1     <b>Q. Do you know an individual named Jamar Lewis?</b></p> <p>2     A. No.</p> <p>3     <b>Q. His nickname was Tweet or Black Boy.</b></p> <p>4     A. No.</p> <p>5     <b>Q. At any time, did you ever observe Ben Baker</b> <b>run from the police?</b></p> <p>6     A. No.</p> <p>8     <b>Q. Have you ever been on the third floor of the</b> <b>527 building at Ida B. Wells?</b></p> <p>9     A. No.</p> <p>11    <b>Q. Have you ever observed Bebe at any time with</b> <b>illegal narcotics?</b></p> <p>13    A. No.</p> <p>14    <b>Q. Do you know any police officers that were on</b> <b>Ron Watts's team?</b></p> <p>16    MS. KLEINHAUS: Objection, foundation.</p> <p>17    You can answer. And form.</p> <p>18    MR. FLAXMAN: Yeah. Go ahead. Do you</p> <p>19    mean did he know them personally, know their names?</p> <p>20    MR. BAZAREK: Yeah.</p> <p>21    BY MR. BAZAREK:</p> <p>22    <b>Q. If you know them in any manner, name --</b></p> <p>23    A. I knew -- I knew Ron Watts and Alvin Jones.</p> <p>24    <b>Q. Did you -- did you know any other officers</b></p>	<p>1     A. Uh-huh.</p> <p>2     <b>Q. Yeah. I think -- did he do an affidavit for</b> <b>you, or have you ever --</b></p> <p>4     A. Yeah. He got -- he actually got locked up</p> <p>5     with me, but I don't really know what his charge</p> <p>6     was. He didn't go to the jail that I went to. They</p> <p>7     basically took him to the -- took both of us to the</p> <p>8     police station, charged me for drugs. And I think</p> <p>9     they charged him for trespassing, whatever, and let</p> <p>10    him go home.</p> <p>11    <b>Q. Yeah. I'm not -- and I don't want to talk</b> <b>about your -- you know, the -- really, the lawsuit.</b> <b>But I wanted to talk about when you said he got</b> <b>roughed up, was that a different day when you said</b> <b>he got roughed up?</b></p> <p>16    A. No. That was the same day.</p> <p>17    <b>Q. Okay. Did you ever have any other negative</b> <b>interactions, other than that one, for that particular</b> <b>day?</b></p> <p>20    MR. FLAXMAN: You mean with -- are you</p> <p>21    talking about with Alvin Jones?</p> <p>22    MR. BAZAREK: Yeah. With -- with -- yeah.</p> <p>23    Yes. He's -- yeah, because he's only had interactions</p> <p>24    with Jones and Watts.</p>
<p style="text-align: center;">Page 34</p> <p>1     <b>on Watts's team?</b></p> <p>2     A. No.</p> <p>3     <b>Q. Okay. Did you ever have any -- other than</b> <b>Alvin Jones and Ron Watts, did you ever have any</b> <b>interactions with any other officers that were on</b></p> <p>6     <b>Ron Watts's team?</b></p> <p>7     MR. FLAXMAN: Objection, foundation.</p> <p>8     THE WITNESS: No.</p> <p>9     BY MR. BAZAREK:</p> <p>10    <b>Q. Tell me about your interactions with</b> <b>Alvin Jones.</b></p> <p>12    A. I was standing on the front of the</p> <p>13    575 building in the extensions with a friend waiting</p> <p>14    on my cousin to come down. At that time, Alvin Jones</p> <p>15    and Ron Watts pulled up to the building where I was</p> <p>16    at and started questioning and handcuffing me, wanted</p> <p>17    to know do I know anyone who have drugs or sold drugs.</p> <p>18    Basically roughing me up for information to get</p> <p>19    someone locked up.</p> <p>20    <b>Q. And who was the friend you were with?</b></p> <p>21    A. Christopher Washington.</p> <p>22    <b>Q. Could you say that again?</b></p> <p>23    A. Christopher Washington.</p> <p>24    <b>Q. Christopher Washington?</b></p>	<p style="text-align: center;">Page 36</p> <p>1     THE WITNESS: No. That was the only time.</p> <p>2     BY MR. BAZAREK:</p> <p>3     <b>Q. So it was just one negative interaction,</b> <b>and that was with both Watts and Jones, right?</b></p> <p>5     A. Yes.</p> <p>6     <b>Q. Prior to that day, did you ever -- or strike</b> <b>that.</b></p> <p>8     <b>Prior to that day, the negative interaction</b> <b>you -- you testified to, had you ever had other</b> <b>interactions with Jones or Watts?</b></p> <p>11    A. No.</p> <p>12    <b>Q. Did you know who they were before the day</b> <b>you had the negative interactions with them?</b></p> <p>14    A. Yes.</p> <p>15    <b>Q. How did you know who they were?</b></p> <p>16    A. I done been -- police officers always coming</p> <p>17    through the projects.</p> <p>18    <b>Q. Has -- strike that.</b></p> <p>19    <b>Did -- did Ben Baker at any time ever ask</b> <b>you to be a witness for him in any of his criminal</b> <b>court proceedings?</b></p> <p>22    A. No.</p> <p>23    <b>Q. Did any attorney who identified himself as</b> <b>an attorney for Ben Baker ever reach out to you to</b></p>

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<p style="text-align: center;">Page 37</p> <p>1 <b>talk to you?</b>    2 MS. KLEINHAUS: Objection to form. Do you    3 mean in the criminal cases?    4 MR. BAZAREK: Yeah. Yeah. Yeah. Yeah.    5 Yeah. Yes.    6 MR. FLAXMAN: Want to just put a time period    7 on it to make it simpler?    8 MR. BAZAREK: Let me -- I'll ask another    9 question.    10 BY MR. BAZAREK:    11 <b>Q. You've already testified you know Ben Baker, right?</b>    12 MR. FLAXMAN: Objection to misstates    13 testimony.    14 BY MR. BAZAREK:    15 <b>Q. Do you know -- do you know -- do you know Ben Baker, or do you know of Ben Baker?</b>    16 A. Yes. I know of Ben Baker.    17 <b>Q. Okay. And then I want to make sure I understand.</b>    18 <b>What -- what is it that you know of Ben Baker?</b>    19 A. I just know -- know him by Ben and know that    20 I always saw him around in the projects.</p>	<p style="text-align: center;">Page 39</p> <p>1 him. Yeah. It might not be a question, so I want    2 to -- I want to read it back.    3 (Whereupon, the record was read as    4 requested.)    5 BY MR. BAZAREK:    6 <b>Q. Right. So did you ever work for anyone who sold drugs for Ben Baker?</b>    7 MS. KLEINHAUS: Objection; form, foundation.    8 MR. FLAXMAN: You can answer the question.    9 THE WITNESS: No.    10 BY MR. BAZAREK:    11 <b>Q. Ben Baker testified at his deposition that you had a bag of cocaine inside the 527 building on March 23, 2005; is that true?</b>    12 MS. KLEINHAUS: Objection --    13 THE WITNESS: No.    14 MS. KLEINHAUS: -- form.    15 BY MR. BAZAREK:    16 <b>Q. So if Ben Baker said that you had cocaine on your person on March 23, 2005, Ben Baker is lying, right?</b>    17 MR. FLAXMAN: Objection --    18 MS. KLEINHAUS: Objection to form.    19 MR. FLAXMAN: Objection; misstates the</p>
<p style="text-align: center;">Page 38</p> <p>1 <b>Q. And when you saw him around in the projects, what -- what would he be doing?</b>    2 A. Just walking around talking to people.    3 <b>Q. Did Ben Baker have a dog?</b>    4 A. Not that I know of.    5 <b>Q. Okay. Have you ever been inside Ben Baker's -- strike that.</b>    6 During the time when the -- when the    7 extensions were still up, were you ever inside    8 Ben Baker's apartment?    9 A. No.    10 <b>Q. Have you ever worked for any individuals who worked for Ben Baker?</b>    11 A. No.    12 <b>Q. And the reason why I'm asking you is because Ben Baker, when he -- he testified at deposition, he said that, you know, maybe you would have worked for someone who sold drugs for him.</b>    13 MS. KLEINHAUS: Objection to form.    14 You can answer.    15 MR. FLAXMAN: I object. Is there a question,    16 Bill?    17 MR. BAZAREK: Yeah. You know, let's --    18 let's read back -- let's read back what I just asked</p>	<p style="text-align: center;">Page 40</p> <p>1 testimony, foundation.    2 MR. BAZAREK: Well, we're going to --    3 we're going to go through the testimony. That's not    4 a problem.    5 BY MR. BAZAREK:    6 <b>Q. But go -- you could answer the question.</b>    7 A. You say is he lying?    8 <b>Q. Yes.</b>    9 A. Yes.    10 <b>Q. Why -- why do you think Ben Baker would give false testimony at a deposition and say that you were in possession of cocaine on March 23, 2005?</b>    11 MR. FLAXMAN: Objection --    12 MS. KLEINHAUS: Objection; form, foundation.    13 MR. FLAXMAN: Objection; misstates the    14 testimony, foundation.    15 You can answer.    16 THE WITNESS: I don't know.    17 BY MR. BAZAREK:    18 <b>Q. Are you on bad terms with Ben Baker that he would just be making, you know, false allegations against you?</b>    19 MR. FLAXMAN: Objection; asked and answered,    20 vague, foundation.</p>

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<p>1        THE WITNESS: No.</p> <p>2        BY MR. BAZAREK:</p> <p>3        <b>Q. What do you think about that, that Ben Baker</b>  <b>4        is saying that you and Bebe were selling illegal</b>  <b>5        narcotics out of the 527 building on March 23, '05?</b></p> <p>6        MS. KLEINHAUS: Objection, calls --</p> <p>7        MR. FLAXMAN: Objection, foundation --</p> <p>8        MS. KLEINHAUS: Sorry. Go ahead, Joel.</p> <p>9        MR. FLAXMAN: Foundation and misstates</p> <p>10      testimony.</p> <p>11      MS. KLEINHAUS: Objection, calls for</p> <p>12      speculation.</p> <p>13      MR. FLAXMAN: Go ahead.</p> <p>14      THE WITNESS: You said what do I think of it?</p> <p>15      BY MR. BAZAREK:</p> <p>16      <b>Q. Yes.</b></p> <p>17      A. I think all of the lying is not truth.</p> <p>18      <b>Q. Does that get you angry --</b></p> <p>19      A. No.</p> <p>20      <b>Q. -- that Mr. -- no?</b></p> <p>21      A. No.</p> <p>22      MR. BAZAREK: All right. Let's take about a</p> <p>23      ten-minute break, and I'm going to circulate exhibits</p> <p>24      for this deposition before we -- say it again.</p>	<p>1        A. No. I ain't got nothing against him.</p> <p>2        <b>Q. So why do you -- you know, why do you</b>  <b>3        think he would be saying these false things about</b>  <b>4        you selling cocaine on March 23, 2005?</b></p> <p>5        MS. KLEINHAUS: Objection --</p> <p>6        MR. FLAXMAN: Objection --</p> <p>7        MS. KLEINHAUS: Sorry. Go ahead, Joel.</p> <p>8        MR. FLAXMAN: Objection, foundation.</p> <p>9        MS. KLEINHAUS: Objection to form; asked</p> <p>10      and answered; calls for speculation.</p> <p>11      You can answer.</p> <p>12      THE WITNESS: I don't know.</p> <p>13      MR. BAZAREK: Okay. Can we put up on</p> <p>14      the -- on the screen Deposition Exhibit 1? That will</p> <p>15      be the transcript from August 9, 2023, of Ben Baker,</p> <p>16      a portion.</p> <p>17      THE VIDEOGRAPHER: I apologize. The --</p> <p>18      they're still populating. Stand by.</p> <p>19      MR. BAZAREK: Okay.</p> <p>20      THE VIDEOGRAPHER: What one -- which one was</p> <p>21      it? Exhibit 1?</p> <p>22      MR. BAZAREK: That will be Exhibit 1.</p> <p>23      And what I'd like you to do -- it won't take long.</p> <p>24      But I'd like to have the witness review -- first</p>
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<p>1        THE VIDEOGRAPHER: The time is 11:56 a.m.</p> <p>2        We're going off the record.</p> <p>3        (Whereupon, a break was taken,</p> <p>4        after which the following</p> <p>5        proceedings were had:)</p> <p>6        THE VIDEOGRAPHER: The time is 12:06 p.m.</p> <p>7        We're back on the record.</p> <p>8        BY MR. BAZAREK:</p> <p>9        <b>Q. Mr. Bradley, did any police officer ever</b>  <b>10      recover drugs from you and plant those drugs on</b>  <b>11      Ben Baker?</b></p> <p>12      A. No.</p> <p>13      <b>Q. Did any police officer retrieve cocaine</b>  <p>14      <b>that you threw to the ground and planted it on</b>  <p>15      <b>Ben Baker?</b></p> <p>16      A. No.</p> <p>17      <b>Q. Could you describe what your relationship</b>  <p>18      <b>was with Ben Baker, if any?</b></p> <p>19      A. We don't have a relationship.</p> <p>20      <b>Q. Have you ever spoken to him?</b></p> <p>21      A. I spoke -- yeah. I spoke to him before</p> <p>22      by saying, what's up, Ben? That's about it.</p> <p>23      <b>Q. So there was no animosity or anything</b>  <p>24      <b>between you two, as far as you knew?</b></p> </p></p></p></p>	<p>1        review that portion of the transcript, and then I'm</p> <p>2        going to have some questions.</p> <p>3        THE VIDEOGRAPHER: Which page would you like,</p> <p>4        sir?</p> <p>5        MR. BAZAREK: Let's go to the second page.</p> <p>6        BY MR. BAZAREK:</p> <p>7        <b>Q. Are you able to read it, sir? I can read it</b>  <p>8        <b>out loud for you if that's easier. I have no problem</b>  <p>9        <b>reading it.</b></p> <p>10      A. Yeah. That's fine.</p> <p>11      <b>Q. Okay. All right. So I'm going to read</b>  <p>12      <b>you Mr. Baker's sworn testimony that was given on</b>  <p>13      <b>August 9, 2023. And for context, sir, we're --</b>  <p>14      <b>I mean, I'm asking him questions about his arrest</b>  <p>15      <b>on March 23, 2005, okay?</b></p> <p>16      A. Okay.</p> <p>17      <b>Q. So I'll start, and it's on page 222.</b></p> <p>18      <b>Question: Was that -- is that what</b>  <p>19      <b>you did on March 23?</b></p> <p>20      <b>Answer: I'm not sure. Maybe at</b>  <p>21      <b>some point.</b></p> <p>22      <b>Question: All right. Tell me what</b>  <p>23      <b>you remember.</b></p> <p>24      <b>Answer: During that day?</b></p> </p></p></p></p></p></p></p></p></p>

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<p>1 have any narcotics with them when 2 you saw them? 3 Answer: Yeah. They both had a bag 4 in their hand. 5 Question: What did Tawny have in 6 his hand? 7 Answer: I believe Tawny had 8 cocaine. 9 Question: Bebe had heroin? 10 Answer: Yes. 11 Question: And do you see them 12 with the narcotics before you see 13 Officer Nichols? 14 Answer: Yeah, because I'm coming 15 down the stairs and they standing 16 right -- right there on the 17 third-floor landing. And as I get 18 to, like, the fourth step -- fourth 19 or fifth step from the bottom, 20 that's when Nichols step out the 21 hallway with his gun drawn, and 22 he's like, y'all come out the 23 hallway. 24 Question: He's calling all three</p>	<p>1 hand up. And I stopped. 2 Question: Now, what happened to 3 Tawny? 4 Answer: He was still up there with 5 Nichols. 6 Question: So Tawny didn't run? 7 Answer: No. Tawny was closest to 8 Nichols, so I guess when we ran, he 9 probably grabbed him. I don't 10 know. 11 What did Tawny do with the cocaine? 12 Answer: I don't know. I guess 13 Nichols got it from him because he 14 put it on me. 15 And then the videographer says, Mr. Baker, 16 if you could lower your hand. He complies. 17 Videographer: Thank you. Okay. 18 Question: Did you ever talk to 19 Tawny about March 23, 2005? 20 Answer: I don't even -- I don't 21 know when the last time I seen 22 Tawny, so I don't know. 23 Is he alive or dead? 24 I'm not sure. I haven't seen him.</p>
<p>1 of you? 2 Answer: Like, y'all come 3 out. I'm like, damn, I'm coming 4 down the stairs. He said, y'all 5 come out the stairwell into the 6 hallway. So we went into the 7 hallway. He told us to put our 8 hands on the wall. We put our 9 hands on the wall. Then Bebe 10 looked and ran. 11 Question: What did Bebe do with 12 the heroin that he had? 13 I don't know. He might have 14 threw it down. But I know I ran 15 when he -- after he ran, I ran. 16 And when I got down to the second 17 floor, Bebe was right there, and he 18 was looking. So I said, no, I 19 ain't going to go right there with 20 him. I'm going to go on down the 21 stairs. And I went on down to the 22 first floor, and I was finna go out 23 the building. And then Manny came 24 through the doorway, and he put his</p>	<p>1 Question: So did Tawny ever 2 discuss with you at any time the 3 events of March 23, '05? 4 Answer: No. I don't believe. 5 I don't recall him. 6 Question: The cocaine that you saw 7 Tawny with, did you ever see it 8 again that day? 9 Answer: Yeah. 10 Question: Where? 11 Answer: In Nichols's hand. 12 Question: And when -- strike that. 13 And where was -- where did you 14 first see Nichols having that 15 cocaine in his hand? 16 Answer: When I was standing there 17 with Manny. After Manny had 18 searched me, Nichols came out the 19 hallway. Nichols said, yeah, 20 that's him. And they put the 21 cuffs on me and took me to the car. 22 Question: So Nichols approaches 23 you and Officer Leano and Nichols 24 had the cocaine that Tawny had?</p>

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<p>1 for speculation.</p> <p>2 MR. FLAXMAN: Objection to foundation;</p> <p>3 misstating testimony.</p> <p>4 You can answer.</p> <p>5 THE WITNESS: To be honest, I don't feel no</p> <p>6 type of way about it. I just know what he's saying</p> <p>7 about me is not true. And really just all I have to</p> <p>8 say.</p> <p>9 BY MR. BAZAREK:</p> <p>10 <b>Q. I mean, does that make you feel bad that</b></p> <p>11 <b>he's -- he's saying lies about you?</b></p> <p>12 MS. KLEINHAUS: Objection to form.</p> <p>13 MR. FLAXMAN: Objection; foundation,</p> <p>14 misstates testimony.</p> <p>15 Go ahead.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MR. BAZAREK:</p> <p>18 <b>Q. I mean, he's defaming you, right?</b></p> <p>19 MS. KLEINHAUS: Objection to form; calls</p> <p>20 for speculation.</p> <p>21 MR. FLAXMAN: Objection to foundation;</p> <p>22 misstates testimony.</p> <p>23 BY MR. BAZAREK:</p> <p>24 <b>Q. I mean, do you -- do you find that</b></p>	<p>1 not the best quality pictures, but if you can go --</p> <p>2 go through each row and tell me if there's someone</p> <p>3 in there that you know.</p> <p>4 For instance, you see the first person,</p> <p>5 number 1, is John Bradley? Do you see that?</p> <p>6 A. Yeah.</p> <p>7 <b>Q. And then just go right -- right down the</b></p> <p>8 <b>line and tell me -- just stop when you see someone</b></p> <p>9 <b>you know.</b></p> <p>10 <b>Can you -- can you do that for me?</b></p> <p>11 A. Okay. The only person I know here is</p> <p>12 John Bradley.</p> <p>13 <b>Q. The -- number 1? Photo number 1?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. Who's John Bradley?</b></p> <p>16 A. That's my brother.</p> <p>17 <b>Q. Did your brother get arrested in Sin City?</b></p> <p>18 MR. FLAXMAN: Objection, foundation.</p> <p>19 THE WITNESS: I don't even know where</p> <p>20 Sin City at.</p> <p>21 BY MR. BAZAREK:</p> <p>22 <b>Q. Well, has -- was your -- has your brother</b></p> <p>23 <b>ever been arrested by the Chicago Police Department?</b></p> <p>24 A. Yes.</p>
<p style="text-align: center;">Page 58</p> <p>1 <b>defamatory? He's saying you were selling drugs on</b></p> <p>2 <b>that day.</b></p> <p>3 MR. FLAXMAN: Objection to foundation.</p> <p>4 THE WITNESS: You said defam- -- what do that</p> <p>5 mean?</p> <p>6 BY MR. BAZAREK:</p> <p>7 <b>Q. Defamatory. He's defaming you.</b></p> <p>8 MR. FLAXMAN: Bill, he told you he doesn't</p> <p>9 know what that means.</p> <p>10 BY MR. BAZAREK:</p> <p>11 <b>Q. Okay. Like, where someone is saying</b></p> <p>12 <b>something, like, false about someone.</b></p> <p>13 A. People say stuff about people every day.</p> <p>14 Don't mean it's true.</p> <p>15 <b>Q. And you saw there was a reference to</b></p> <p>16 <b>Officer Nichols.</b></p> <p>17 <b>Do you know -- even know an Officer Nichols?</b></p> <p>18 A. No.</p> <p>19 <b>Q. Okay. So why don't we look at the next</b></p> <p>20 <b>document I want to show you. We'll make this</b></p> <p>21 <b>Exhibit 2. This is going to be -- it's City-BG-028601</b></p> <p>22 <b>to 602. It's some Sin City pictures.</b></p> <p>23 <b>And really, all I want you to do here,</b></p> <p>24 <b>Mr. Bradley, if you could look -- and I know it's</b></p>	<p style="text-align: center;">Page 60</p> <p>1 <b>Q. For what?</b></p> <p>2 A. To be honest, I can't say.</p> <p>3 <b>Q. Was your brother, John Bradley -- was he</b></p> <p>4 <b>engaged in illegal narcotics activity?</b></p> <p>5 MR. FLAXMAN: Objection, foundation.</p> <p>6 THE WITNESS: Not that I know of.</p> <p>7 BY MR. BAZAREK:</p> <p>8 <b>Q. Has your brother, John Bradley, ever been</b></p> <p>9 <b>incarcerated?</b></p> <p>10 A. Yes.</p> <p>11 <b>Q. What was he incarcerated for?</b></p> <p>12 A. I know one case he was incarcerated for --</p> <p>13 I think it was for a battery.</p> <p>14 <b>Q. Okay. Was he ever incarcerated for narcotics</b></p> <p>15 <b>activity?</b></p> <p>16 A. Not that I know of.</p> <p>17 <b>Q. Okay. So let's go -- I think we still have</b></p> <p>18 <b>to go to -- there's a second page to this document.</b></p> <p>19 <b>And take -- and take a look on there, sir, and let me</b></p> <p>20 <b>know if you know any of those individuals. I know you</b></p> <p>21 <b>mentioned Wilbert -- Wilbert Moore or you knew of him.</b></p> <p>22 A. Yeah. That's -- there's only two people</p> <p>23 that I recognize --</p> <p>24 <b>Q. Who do you recognize?</b></p>

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<p>1       A. The person that's deceased, Wilbert -- 2 what's his last name?</p> <p>3       <b>Q. Moore?</b></p> <p>4       A. Yeah. That's the first person. And at the 5 bottom down there, I see Ben Baker.</p> <p>6       <b>Q. Do you see the -- the fellow next to him,</b> 7 <b>Elgen Moore? Does he look familiar?</b></p> <p>8       A. No. I don't know him.</p> <p>9       <b>Q. Mr. Baker testified under oath that</b> 10 <b>Elgen Moore sold narcotics for him out of the</b> 11 <b>527 building. So wondered if you knew him or saw</b> 12 <b>him around the 527 building, perhaps.</b></p> <p>13       A. No. I don't know him.</p> <p>14       <b>Q. Okay.</b></p> <p>15       MR. BAZAREK: We can take that down.</p> <p>16 BY MR. BAZAREK:</p> <p>17       <b>Q. Let's go to Exhibit 3. This will be</b> 18 <b>DO-Joint 002924. And I don't have names, but</b> 19 <b>there's -- at least on some of the pictures,</b> 20 <b>there's numbers.</b></p> <p>21       <b>And can you tell me -- do you know any of</b> 22 <b>the individuals that are in this series of photographs</b> 23 <b>on this Exhibit 3?</b></p> <p>24       A. Just Ben Baker.</p>	<p>1       <b>was wearing that jersey that he has in these pictures?</b></p> <p>2       A. No.</p> <p>3       MR. BAZAREK: All right. We can take that 4 down. Let's take a look next at DO-Joint -- this will 5 be Exhibit 5 -- DO-Joint 048883 through 84. Okay. 6 Maybe -- get it a little bigger.</p> <p>7 BY MR. BAZAREK:</p> <p>8       <b>Q. And, Mr. Bradley, do you know who's in that</b> 9 <b>photograph?</b></p> <p>10       A. Yes.</p> <p>11       <b>Q. Who is that?</b></p> <p>12       A. Gregory Young.</p> <p>13       <b>Q. Is that Bebe?</b></p> <p>14       A. Yes.</p> <p>15       <b>Q. All right. And let's look at one more</b> 16 <b>booking photo. DO-Joint 048882.</b></p> <p>17       MR. BAZAREK: And this is -- what -- is 18 this 6?</p> <p>19       MR. FLAXMAN: Yes.</p> <p>20       MR. BAZAREK: Okay.</p> <p>21 BY MR. BAZAREK:</p> <p>22       <b>Q. And who's in this photo?</b></p> <p>23       A. Gregory Young.</p> <p>24       <b>Q. Okay. That's Bebe?</b></p>
<p style="text-align: center;">Page 62</p> <p>1       <b>Q. Okay. All right.</b></p> <p>2       MR. BAZAREK: We can take that down.</p> <p>3 BY MR. BAZAREK:</p> <p>4       <b>Q. So the next one I want to show you is --</b> 5 <b>this is DO-Joint 048313 to 14. That -- this will be</b> 6 <b>Exhibit 4. And it's -- there's a headshot of</b> 7 <b>Ben Baker and then a side shot.</b></p> <p>8       <b>Do you see that?</b></p> <p>9       A. I just see one picture.</p> <p>10       <b>Q. Yeah.</b></p> <p>11       MR. BAZAREK: Can you show him the other -- 12 okay. There you go.</p> <p>13 BY MR. BAZAREK:</p> <p>14       <b>Q. All right. And that's Ben Baker in that --</b> 15 <b>in those booking photographs, right?</b></p> <p>16       A. Yes.</p> <p>17       <b>Q. And I'll represent to you, Mr. Bradley,</b> 18 <b>that's from March 23, 2005, after Ben Baker was</b> 19 <b>arrested for possessing cocaine and heroin.</b></p> <p>20       <b>Looking at Ben Baker in this booking</b> 21 <b>photograph, is that how you remember him from</b> 22 <b>Ida B. Wells?</b></p> <p>23       A. Yes.</p> <p>24       <b>Q. Were you ever present with Ben Baker when he</b></p>	<p style="text-align: center;">Page 64</p> <p>1       A. Yes.</p> <p>2       <b>Q. He looks -- he looks a little younger in</b> 3 <b>that picture, right?</b></p> <p>4       A. Look the same to me.</p> <p>5       <b>Q. Okay. All right.</b></p> <p>6       MR. BAZAREK: Okay. We can take that down.</p> <p>7       You know, I think -- at least for my 8 questioning, I think I'm just about done, but why 9 don't we take a quick five-minute break?</p> <p>10       THE VIDEOGRAPHER: The time is 12:33 p.m.</p> <p>11       We're going off the the record.</p> <p>12       (Whereupon, a break was taken, 13       after which the following 14       proceedings were had:)</p> <p>15       THE VIDEOGRAPHER: The time is 12:41 p.m.</p> <p>16       We're back on the record.</p> <p>17 BY MR. BAZAREK:</p> <p>18       <b>Q. Mr. Bradley, I'm going to show you -- and</b> 19 <b>we'll put it up on the screen -- what's going to</b> 20 <b>be marked as Deposition Exhibit Number 7. And it's</b> 21 <b>Ben Baker's testimony from May 23, 2006. And it's</b> 22 <b>under Baker Glenn 013304-013429. And then we're going</b> 23 <b>to -- we're going to look at that. And what I -- I</b> 24 <b>want to get to a certain page. I can tell you on a</b></p>

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<p>1 PDF, it would be the 28th page. And I'll just read -- 2 it's -- Baker Glenn 013360 is the Bates range. 3 Baker Glen 013360. 4 And just like we did before, Mr. Bradley, 5 I'm going to read Ben Baker's testimony. And at the 6 top, there is an answer, yes. 7 Question: About 3:40 p.m., where 8 were you? 9 Answer: Coming down the stairwell. 10 Question: Where were you going? 11 Answer: I was going to get my 12 mother a birthday gift because that 13 is her birthday, March the 23rd. 14 Question: Were you with anybody? 15 Answer: No. 16 Question: By the time you got 17 down, where were you coming from? 18 Answer: I was coming from the 19 sixth floor, Apartment 608. 20 Question: By the time you got down 21 to the third floor, did you run 22 into anybody else? 23 Answer: Yeah. There were two 24 individuals standing in the</p>	<p>1 in uniform? 2 Answer: No. 3 Did he have his gun drawn? 4 Answer: Yes. 5 Was he with a partner? 6 Answer: No. 7 Question: Where was the gun 8 pointed? 9 Answer: At me. 10 Question: What did Officer Nichols 11 say? 12 Answer: He said, you gentlemen 13 come out of the stairwell into the 14 hallway. 15 Question: And did you do that? 16 Answer: Yes. 17 Question: What did Officer Nichols 18 say after that? 19 Answer: He said get on the wall; 20 put y'all hands on the wall. 21 And then the Court says, he said what? 22 The answer, put your hands on the wall. 23 And then question: Did you put 24 your hands on the wall?</p>
<p style="text-align: center;">Page 66</p> <p>1 hallway. 2 Question: Do you know who they 3 were? 4 Answer: Yes. 5 Question: Who were they? 6 Answer: It's Bebe and Tawny. 7 Question: Are those the only names 8 you know them by? 9 Answer: Well, I know Gregory 10 Young. That's Bebe. But I don't 11 know Tawny's real name. 12 Question: Do you know what Bebe 13 and Tawny were doing? 14 Answer: Selling drugs. 15 Question: While you were walking 16 down the stairs and you passed by 17 Bebe and Tawny, did something 18 happen? 19 Answer: Yes. 20 Question: What happened? 21 Officer Nichols came out the 22 hallway into the stairwell with his 23 gun drawn. 24 Question: Now, was Officer Nichols</p>	<p style="text-align: center;">Page 68</p> <p>1 Answer: Yes. 2 Question: Did Bebe and Tawny? 3 Answer: Yes. 4 Question: What happened next? 5 Answer: Bebe took off running. 6 Question: Bebe took off running? 7 Answer: Yeah. 8 Which way did he go? 9 Answer: To the stairwell closest 10 to us. 11 Question: What did Officer Nichols 12 do? 13 He looked. Then I took off 14 running. 15 Question: Then you took off 16 running? 17 Answer: Yeah. 18 Why did you run? 19 Answer: Because Tawny had the bags 20 of cocaine in his hands, and they 21 told -- 22 Question: Tawny had the bags in 23 his hands? 24 Answer: Yeah. And Watts -- well,</p>

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Page 69	Page 71
<p>1           <b>AJ said they were going to put</b>  2           <b>another case on me.</b>  3           <b>Question: And you knew Nichols</b>  4           <b>to be part of Watts's team?</b>  5           <b>Answer: Yes.</b>  6           <b>There's an objection.</b>  7           <b>Question: So you ran. What</b>  8           <b>happened when you ran?</b>  9           <b>I ran to the first floor. When</b>  10           <b>I got to the first floor to go out</b>  11           <b>the doorway, Manny, Nichols's</b>  12           <b>partner, came into the front door</b>  13           <b>and put his hands on my chest</b>  14           <b>like that.</b>  15           MR. BAZAREK: Let me take a -- I'm going  16           to move on. I'll tell you if I have another portion  17           I want to read.  18           Okay. That's -- you can take it down.  19           I don't -- I don't have anything else with that one.  20           That's all I have at the moment, Mr. Bradley.  21           Thank you.  22           MR. GAINER: I don't have any questions  23           for you, Mr. Bradley. Thank you for your time.  24           MR. DAFFADA: No questions.</p>	<p>1           <b>where you suspected or believed he was under the</b>  2           <b>influence of narcotics?</b>  3           A. No.  4           MR. RAVITZ: Okay. Thank you. I have  5           nothing further.  6           MS. HARRIS: I don't have any questions on  7           behalf of the City.  8           MR. BORKAN: No questions on behalf of  9           Ridgell.  10           MR. FLAXMAN: We don't have any questions.  11           We'll reserve signature. I guess we're done.  12           THE VIDEOGRAPHER: This is the end of today's  13           deposition. The time is 12:48 p.m. Total running  14           length of this deposition is one hour, 25 minutes,  15           and 25 seconds. We're now going off the record.  16           MR. BAZAREK: I'll take a copy of the  17           transcript.  18           (Witness excused at 12:49 p.m.)  19           (Whereupon, Deposition Exhibit  20           Nos. 1-7 were marked for  21           identification.)  22  23  24</p>
Page 70	
<p>1           EXAMINATION  2           BY MR. RAVITZ:  3           <b>Q. Hi. Mr. Bradley, I'm Gary Ravitz.</b>  4           <b>I'd like to ask you a couple questions, if I may.</b>  5           <b>You said you know Gregory Young?</b>  6           A. Yes.  7           <b>Q. And how long have you known Gregory Young?</b>  8           A. For a few years.  9           <b>Q. What is that -- can you -- could you give</b>  10           <b>me a year when you may have met him --</b>  11           MS. KLEINHAUS: Objection, asked and  12           answered.  13           BY MR. RAVITZ:  14           <b>Q. You can answer.</b>  15           A. Well, I first met him when I was in grammar  16           school.  17           <b>Q. Okay. And what -- how would you describe</b>  18           <b>your relationship with Mr. Young?</b>  19           A. We don't have a relationship. I just knew  20           him through his son.  21           <b>Q. Okay. Did you know whether Gregory Young</b>  22           <b>used narcotics?</b>  23           A. No.  24           <b>Q. Have you ever seen him under circumstances</b></p>	

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1 IN THE UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF ILLINOIS  
3 EASTERN DIVISION  
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5 In re: WATTS COORDINATED )  
6 PRETRIAL PROCEEDINGS ) Case No. 19 cv 1717  
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9 I, ANTWAN BRADLEY, being first duly sworn,  
on oath, say that I am the deponent in the aforesaid  
10 deposition, that I have read the foregoing transcript  
of my deposition taken December 21, 2023, consisting  
11 of Pages 1 through 74 inclusive, taken at the  
aforesaid time and place and that the foregoing is  
12 a true and correct transcript of my testimony so  
given.

13             Corrections have been submitted  
14             No corrections have been submitted

16 ANTWAN BRADLEY, Deponent

18 SUBSCRIBED AND SWORN TO  
19 before me this \_\_\_\_\_ day  
of \_\_\_\_\_ A.D., 2024.

## Notary Public

In Re: Watts Coordinated Pretrial Proceedings  
Deposition of Antwan Bradley - Taken 12/21/2023

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1 NORTHERN DISTRICT OF ILLINOIS)  
2 EASTERN DIVISION )  
3 STATE OF ILLINOIS )  
4 ) SS:  
5 COUNTY OF COOK )

6 I, Emma Sheehy, Certified Shorthand Reporter  
7 in and for the County of Cook, State of Illinois, do  
8 hereby certify that on the 21st of December, 2023,  
9 the deposition of the witness, ANTWAN BRADLEY,  
10 called by the Defendants, was taken before me via  
11 videoconference, reported stenographically, and was  
12 thereafter reduced to typewriting through  
13 computer-aided transcription.

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

16 I further certify that the foregoing is a  
17 true, accurate and complete record of the questions  
18 asked of and answers made by the said witness, at the  
19 time and place hereinabove referred to.

20 The signature of the witness was reserved by  
21 agreement.

22 The undersigned is not interested in the  
23 within case, nor of kin or counsel to any of the  
24 parties.

In Re: Watts Coordinated Pretrial Proceedings  
Deposition of Antwan Bradley - Taken 12/21/2023

Page 74

1                   Witness my official signature in and for Cook  
2                   County, Illinois on this 15th day of January, 2024.

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10                  License No. 084-004780

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Emma Sheehy, CSR  
161 North Clark Street, Suite 3050  
Chicago, Illinois 60601

