

EXHIBIT 10



Transcript of the Deposition of
Gregory Young

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: February 16, 2024

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In Re: Watts Coordinated Pretrial Proceedings
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

The videotaped deposition of GREGORY YOUNG, 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 via videoconference before Kari Wiedenhaupt, Certified Shorthand Reporter within and for the County of Cook and State of Illinois, commencing at 10:11 a.m. on the 16th day of February, 2024.

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22

23

24

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20 On behalf of the Defendants Matthew
21 Cadman and Michael Spaargaren.

22 ALSO PRESENT: Sofia Johnson, Videographer.

23

24

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1 I N D E X

2 WITNESS PAGE

3 GREGORY YOUNG

4 Examination by Mr. Bazarek 7

5

6 E X H I B I T S

7 NUMBER MARKED FOR ID

8 Young Deposition Exhibit

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1 THE VIDEOGRAPHER: Good morning. We are now
2 on the record. This is the videotaped
3 deposition of Gregory Young being taken on
4 February 16th, 2024. The time is now 10:11 a.m.
5 as indicated on the video screen.

6 We are located today remotely via Zoom,
7 and this deposition is in the matter of Watts
8 Coordinated Pretrial Proceedings. The case
9 number is 19 CV 01717 filed in the United States
10 District Court for the Northern District of
11 Illinois, Eastern Division.

12 My name is Sofia Johnson, certified
13 legal videographer representing Royal Reporting.
14 The court reporter is Kari Wiedenhaupt, also of
15 Royal Reporting.

16 Will counsel please introduce
17 yourselves for the record, and the court
18 reporter will swear in the witness.

19 MR. BAZAREK: My name is William Bazarek. I
20 represent Alvin Jones, Darryl Edwards, and
21 Kenneth Young, Jr.

22 MS. GIZZI: Gianna -- sorry. Gianna on
23 behalf of the plaintiff and the deponent in this
24 office with Mr. Young.

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1 MR. SHAFI: Adnan Shafi. I represent Ronald
2 Watts.

3 MR. PALLE: Eric Palles representing Kallatt
4 Mohammed.

5 MR. BORKAN: Steve Borkan on behalf of
6 Ridgell.

7 MR. FLAXMAN: Joel --

8 MR. SCHALKA: Michael Schalka on behalf of
9 Defendants Spaargaren and Cadman.

10 MR. FLAXMAN: Joel Flaxman for the Flaxman
11 plaintiffs.

12 MS. HARRIS: Dhaviella Harris on behalf of
13 the City and supervisory officers.

14 MR. BAZAREK: Yeah. I will also add that
15 Mr. Young's lawsuit is Case No. 22 CV 2643. I
16 know there was a reference to the case number
17 for the Watts Coordinated Pretrial Proceedings.

18 (Whereupon, the witness was duly
19 sworn.)

20

21

22

23

24

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1 WHEREUPON:

2 GREGORY YOUNG,

3 having been first duly sworn, was examined and
4 testified via videoconference as follows:

5 EXAMINATION

6 BY MR. BAZAREK:

7 Q. Good morning, Mr. Young.

8 Can you state your name and spell your
9 name, please?

10 A. My name is Gregory Young;

11 G-R-E-G-O-R-Y, Young, Y-O-U-N-G.

12 Q. Do you have a middle name, sir?

13 A. No.

14 Q. Have you ever been known by any name
15 other than Gregory Young?

16 A. They used to call me BayBay.

17 Q. And how do you spell BayBay?

18 A. B-A-Y, B-A-Y.

19 Q. That's a nickname?

20 A. Yes. Well, you can -- yeah. My mom --

21 Q. Okay. So as I said, my name is William
22 Bazarek. I represent three of the individuals
23 that you're suing in your lawsuit, and I'm going
24 to be asking you questions today about your

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1 **lawsuit.**

2 **Do you understand that?**

3 A. Yes, sir.

4 Q. Okay. And have you ever given a
5 **deposition before?**

6 A. No.

7 Q. Now, I know that you spoke to the
8 Civilian Office of Police Accountability back in
9 **August of 2018.**

10 **Do you remember that?**

11 A. Yes.

12 Q. Okay. Were you sworn to tell the truth
13 **on that day?**

14 A. No.

15 Q. Okay. Did you tell the truth on that
16 **day?**

17 A. Yes.

18 Q. Okay. And today as I ask you
19 **questions, if you don't understand one of my**
20 **questions, can you let me know right away?**

21 A. Yes, sir.

22 Q. I'm going to assume that any question
23 **that you answer you understood the question; is**
24 **that fair?**

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1 A. Yes, sir.

2 Q. At any time today, sir, if you think
3 you misspoke or you want to clarify one of your
4 answers, you can do so. Okay?

5 A. Yes, sir.

6 Q. Can you remember -- well, and can you
7 remember to do that before you leave this
8 deposition today?

9 A. Yes.

10 Q. Any time today you want to take a break
11 or, you know, you -- you get a cup of coffee,
12 use the bathroom, just let me know, and you can
13 do so. Okay?

14 A. Yes, sir.

15 Q. It's also important that you let me
16 finish my question before you answer, or we are
17 going to end up talking over each other.

18 So can you remember to do that?

19 A. Yes, sir.

20 Q. Are you currently taking any type of
21 medication that would affect your ability to
22 accurately and truthfully give testimony today?

23 A. No.

24 Q. Are you taking any medication of any

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1 **sort?**

2 A. No.

3 **Q. When was the last time you were in a**
4 **courtroom?**

5 A. It's been a while.

6 **Q. And what were the circumstances of the**
7 **last time that you were in a courtroom?**

8 A. I believe it was a trespassing that
9 Watts had put on me.

10 **Q. That was the last time you were in a**
11 **courtroom?**

12 A. Yes, sir. Oh, sorry. When they
13 clarified me on the case, this case here, 2003,
14 and I went to court then.

15 **Q. So are you -- are you speaking of**
16 **something that occurred during the past few**
17 **years?**

18 A. Yes.

19 **Q. Are you -- are you talking about when**
20 **your conviction was vacated?**

21 A. Yes.

22 **Q. And the conviction we're talking about,**
23 **that's the conviction that was the result of**
24 **your March 2nd, 2003, arrest; is that correct?**

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1 A. Yes.

2 Q. Okay. And when were you -- when were
3 you in this courtroom? Do you remember what
4 year that was?

5 A. Not really.

6 Q. Did -- did anyone from the State's
7 Attorney's Office ask to speak with you about
8 your March 2nd, 2003 arrest?

9 A. No.

10 Q. Was there a news conference after your
11 conviction was vacated?

12 A. I believe it was.

13 Q. Did you go -- did you go to court with
14 anyone when it was vacated?

15 A. It was a lot of us in court.

16 Q. Yeah. It was some of your friends?

17 A. Yeah.

18 Q. Yeah. Were -- all of them, were they
19 your friends?

20 A. Pardon me?

21 Q. Were all of them your friends?

22 A. No.

23 Q. Which -- who were the individuals that
24 you -- were your friends that were present for

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1 **this press conference?**

2 A. I can't recall.

3 **Q. Can you recall one?**

4 A. No.

5 **Q. How many individuals were you with?**

6 A. It was about maybe ten, I think.

7 **Q. Yeah. Was Kim Foxx there?**

8 A. No.

9 **Q. Were there news cameras present?**

10 A. No.

11 **Q. Okay. Who was your -- what attorney --**
12 **go ahead. Sorry.**

13 A. Excuse me.

14 We was on video like we are now.

15 **Q. So it was a Zoom -- like a Zoom --**

16 A. Yes.

17 **Q. -- court appearance type thing? I got**
18 **you. Okay.**

19 **Did you speak at that court proceeding?**

20 A. Well, he just asked me my name.

21 **Q. Okay. Who asked you your name, the**
22 **judge?**

23 A. Yes.

24 **Q. Do you remember who the judge was?**

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1 A. No.

2 Q. Okay. Sir, you lived at Ida B. Wells
3 during a certain period of your life; is that
4 right?

5 A. Yes, and my wife --

6 Q. And your --

7 A. -- off and on.

8 Q. And your wife is Penny Owens?

9 A. Yeah. She is deceased now.

10 Q. Okay. And I -- I'm sorry for that.

11 When did your wife pass away?

12 A. A year ago.

13 Q. What year were you married?

14 A. 2000 -- not -- not 2000. I believe it
15 was '18, if I'm not mistaken.

16 Q. You -- you and Penny were married in
17 2018?

18 A. Yeah, I believe so.

19 Q. Okay. And then she passed away in
20 2023?

21 A. Yes.

22 Q. And you have children with Penny,
23 right?

24 A. Yes.

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1 **Q. And you had a son with Penny named**
2 **Corey; is that right?**

3 A. Yes. He's deceased.

4 **Q. Yeah. And he -- how did he pass away?**

5 A. Um, they stuck him up and -- put him in
6 a stolen car and pushed the car into the
7 expressway.

8 **Q. He was -- he was a victim of a violent**
9 **crime?**

10 A. Yes.

11 **Q. He was murdered?**

12 A. Yes.

13 **Q. Who -- who murdered him?**

14 A. I wouldn't know that.

15 **Q. Was -- was the person or persons who**
16 **murdered your son ever apprehended?**

17 A. No, not that I know of.

18 **Q. And what year was Corey murdered?**

19 A. I believe it was -- he's been dead
20 almost nine years ago, if I'm not mistaken.

21 **Q. And I -- and I'm sorry for the loss of**
22 **your son too, sir.**

23 **What -- who are your other children?**

24 A. You want their name?

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1 **Q. Yes.**

2 A. Well, I have one named Precious Young.

3 I have one named Gregory Young. I have one
4 named Keith Young Owens, and I have a
5 daughter -- no. I have a step-daughter,
6 Larhanda Young, and that is it.

7 **Q. Okay. And --**

8 A. Oh, Darius Young (phonetic). Darius
9 Young Owens. He is just deceased.

10 **Q. Can you just -- you know, can you also
11 give me the ages of your children that are
12 alive?**

13 A. My daughter, Precious Young, she is 26.
14 Larhanda's 28, if I'm not mistaken. Gregory's
15 36. Keith is 28, I believe.

16 **Q. And did we go through them all?**

17 A. Yes.

18 **Q. When did you first move into
19 Ida B. Wells?**

20 A. I believe it was 2000- -- no. Um,
21 1970- -- 19- -- I can't recall.

22 **Q. Okay. Let me take a step back.**

23 **What's your date of birth?**

24 A. Mine?

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1 **Q. Yes.**

2 A. Mine? 05/22/1964.

3 **Q. Have you ever used a different date of**
4 **birth other than that date?**

5 A. No.

6 **Q. Like, for instance, have you ever said**
7 **you were born in 1962 to the police or anyone**
8 **else?**

9 A. No.

10 **Q. Okay. So where did you live for the**
11 **first 20 years of your life?**

12 A. 39th, I believe, and Indiana.

13 **Q. Is -- is -- that's -- that's not part**
14 **of -- strike that.**

15 **Is that part of Ida B. Wells?**

16 A. No.

17 **Q. Okay. So after 39th and Indiana, those**
18 **first 20 years, where did you move next?**

19 A. Ida B. Wells.

20 **Q. Okay. What year did you first move to**
21 **Ida B. Wells?**

22 A. I can't recall.

23 **Q. Who were you living with at**
24 **Ida B. Wells when you first moved there?**

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1 A. My wife and my kids.

2 Q. **When did you first meet Penny?**

3 A. I was 13.

4 Q. **How old were you when you had your
5 first child with Penny?**

6 A. Fourteen.

7 Q. **And you -- were you -- were you living
8 together at that time at Ida B. Wells?**

9 A. No.

10 Q. **Where were you living?**

11 A. My mom was staying, if I'm not
12 mistaken, in 4120, and she was staying in 4120.

13 Q. **When you say 4120, what does that mean?**

14 A. That's a building.

15 (Simultaneous speakers.)

16 BY THE WITNESS:

17 A. 41st and Prairie.

18 BY MR. BAZAREK:

19 Q. **It's what?**

20 A. 41st and Prairie.

21 Q. **Okay. So were you living with Penny
22 and your firstborn child with your mom?**

23 A. Yes.

24 Q. **Okay. I'm just trying to -- I'm trying**

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1 **to figure out when you moved to Ida B. Wells --**
2 **or strike that.**

3 **When you lived with Penny --**

4 A. Mm-hmm.

5 Q. **Strike that.**

6 **When you first lived with Penny at**
7 **Ida B. Wells, when was that?**

8 A. I can't recall.

9 Q. **Okay. Was it in the -- was it in the**
10 **1990s?**

11 A. Yeah.

12 Q. **Or was it -- or was it in the 2000s?**

13 A. It was in the '90s.

14 Q. **Okay. And then what -- whose name was**
15 **on the lease? Was it you, or was it Penny?**

16 A. Penny's.

17 Q. **Was your name ever on a lease for --**

18 A. No.

19 Q. **-- any home at Ida B. Wells?**

20 A. No.

21 Q. **Other than living with Penny at**
22 **Ida B. Wells, did you ever live with anyone else**
23 **at Ida B. Wells?**

24 A. No.

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1 **Q. During the time -- strike that.**

2 I want to focus on the -- for the
3 moment, I want to focus on the 2000s, that
4 decade. Okay?

5 A. Mm-hmm.

6 **Q. From 2000 -- from -- strike that.**

7 **From January of 2000 --**

8 A. Mm-hmm.

9 **Q. -- until the buildings at Ida B. Wells**
10 **closed down, did you live at Ida B. Wells?**

11 A. Yes. No, no, no.

12 **Q. Okay. Tell me -- all right. Tell**
13 **me where -- tell me everywhere you lived during**
14 **the 2000s.**

15 A. Um, I believe it was up on Peterson and
16 Broadway. We had moved up there after we had
17 left out the projects.

18 **Q. Okay. Are you talking about after**
19 **Ida B. Wells closed down?**

20 A. Well, it was before they closed down.

21 **Q. Okay. What year did you move up to**
22 **Peterson and Broadway?**

23 A. I can't recall.

24 **Q. Okay. Well, the arrest that you're**

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1 **bringing a lawsuit occurred on March 2nd, 2003,**
2 **right?**

3 A. Yes.

4 Q. **And at that time, you were living at**
5 **Ida B. Wells, right?**

6 A. Yes.

7 Q. **Okay. So how long after that arrest**
8 **did you move to Peterson and Broadway?**

9 A. I believe it was maybe four years after
10 that.

11 Q. **Okay. So approximately you would have**
12 **moved from Ida B. Wells around 2007 or so?**

13 A. Yeah.

14 Q. **Up to Peterson and Broadway, right? Is**
15 **that right?**

16 A. Yes, sir.

17 Q. **And after you moved away in 2007, did**
18 **you ever move back to Ida B. Wells?**

19 A. No.

20 Q. **Okay. And why was it that you moved**
21 **from Ida B. Wells in approximately 2007?**

22 A. My wife wanted to get out of the
23 projects.

24 Q. **And why was that?**

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1 A. Because her job was closer north. She
2 worked at Devon and Clark, the police station.
3 She was the maintenance custodian.

4 Q. **Did -- did -- was she employed by the**
5 **police department or the --**

6 A. No.

7 Q. **-- City of Chicago?**

8 A. No. She was employed by -- it wasn't
9 by Chicago. No.

10 Q. **Okay.**

11 A. She -- it was a private firm.

12 Q. **Okay. During the -- during the decade**
13 **of the 2000s, did you have any employment?**

14 A. No.

15 Q. **So I want to ask you: During the time**
16 **that you lived at Ida B. Wells, would you**
17 **observe what you believed to be illegal**
18 **narcotics activity?**

19 A. Yeah.

20 Q. **Tell me -- tell me what it was that you**
21 **saw that led you to believe that.**

22 A. I plead the Fifth.

23 Q. **Are you a drug dealer, sir?**

24 A. No.

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1 **Q. Have you ever sold illegal drugs?**

2 A. No.

3 **Q. Have you ever possessed illegal drugs?**

4 A. Plead the Fifth.

5 **Q. Did you possess illegal drugs on**
6 **March 2nd, 2003?**

7 A. No.

8 **Q. Who are the persons that you sold drugs**
9 **to?**

10 MS. GIZZI: Objection, form.

11 BY MR. BAZAREK:

12 **Q. Who are -- who are the people that you**
13 **sold illegal narcotics to?**

14 A. Never sold illegal nar- -- narcotics.

15 **Q. Have you ever possessed heroin at any**
16 **time?**

17 A. Plead the Fifth.

18 **Q. Have you ever sold heroin at any time?**

19 A. Plead the Fifth.

20 **Q. Have you ever engaged in illegal gang**
21 **activity?**

22 A. Plead the Fifth.

23 **Q. Are you a Gangster Disciple?**

24 A. Plead the Fifth.

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1 **Q. Do you have any Gangster Disciple**
2 **tattoos?**

3 A. Plead the Fifth.

4 **Q. Did you sell drugs for Ben Baker?**

5 A. Plead the Fifth.

6 **Q. Did you and Ben Baker sell illegal**
7 **narcotics together?**

8 A. Plead the Fifth.

9 **Q. Did you ever work a bundle for Ben**
10 **Baker?**

11 A. Plead the Fifth.

12 **Q. Did you ever sell drugs out of the 527**
13 **building at Ida B. Wells?**

14 A. Plead the Fifth.

15 **Q. Did you engage in illegal criminal**
16 **activity with any members of your immediate**
17 **family?**

18 A. Plead the Fifth.

19 **Q. Who was your supplier of heroin?**

20 A. Plead the Fifth.

21 **Q. What's the most amount -- strike that.**
22 **What's the most amount of money you**
23 **ever made as a drug dealer?**

24 A. Plead the Fifth.

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1 Q. What did you do with the money that you
2 received for your illegal narcotics sales?

3 | A. Plead the Fifth.

4 MS. GIZZI: Bill, can we take a five-minute
5 break?

6 MR. BAZAREK: Sure.

7 MS. GIZZI: Thank you.

8 THE VIDEOGRAPHER: We are going off the
9 record at 10:33 a.m.

10 (Whereupon, a discussion was had
11 off the record.)

12 THE VIDEOGRAPHER: We are back on the record
13 at 10:40 a.m.

14 BY MR. BAZAREK:

15 Q. Mr. Young, do you know a drug dealer
16 named Ben Baker?

17 A. Yes.

18 Q. And how do you know Ben Baker?

19 A. He stayed in the projects, same
20 building I stayed in.

21 Q. Yeah. You lived on the first floor,
22 right?

23 A. Yes, sir.

24 Q. What was your apartment number?

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1 A. 102. I mean -- pardon me. 103, I
2 think.

3 Q. **And Ben Baker, the drug dealer, he**
4 **lived on the second floor, right?**

5 A. Yes.

6 Q. **And do you know his wife, Clarissa**
7 **Glenn?**

8 A. Yes.

9 Q. **Do you know his kids?**

10 A. Yes.

11 Q. **All right. Did -- were his kids and**
12 **your kids friends?**

13 A. Yes.

14 Q. **What types of things would your kids**
15 **and Ben Baker's kids do together?**

16 A. Oh, play football, rode bikes, skate,
17 whatever.

18 Q. **Did -- did they go to the same school?**

19 A. No.

20 Q. **Where did your kids go to school when**
21 **you -- when you lived at Ida B. Wells?**

22 A. Dolittle. Ah, my -- my son Corey went
23 to CVS. My other kids went to Dolittle. Not
24 Dolittle. I take that back. Yeah, Dolittle.

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1 **Q. Right. Dolittle is right across the**
2 **street from Ida B. Wells, right?**

3 **A. Yes, yes.**

4 **Q. And is there a park right there near**
5 **Ida B. Wells?**

6 **A. Yes.**

7 **Q. Yeah. And where's the park in relation**
8 **to Ida B. Wells?**

9 **A. The park would be on Cottage Grove, by**
10 **Cottage Grove.**

11 **Q. So I want to go back -- again, I'm**
12 **focusing on -- from the year of, like, 2000**
13 **until you moved out in approximately 2007 in**
14 **terms of illegal narcotics activity that you**
15 **would observe. Okay?**

16 **A. Mm-hmm.**

17 **Q. And you understand that?**

18 **A. Yes, sir.**

19 **Q. Okay. And I want to ask you, would you**
20 **agree that illegal narcotics were being sold at**
21 **Ida B. Wells 24/7?**

22 **A. Yes.**

23 **Q. And would you agree that you would have**
24 **people coming there every day looking to obtain**

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1 **illegal narcotics?**

2 A. Yes.

3 Q. **And many of those people would be what**
4 **you would think were junkies? Would you agree**
5 **with that?**

6 A. No.

7 Q. **Okay. Like, drug addicts would go --**
8 **would be going there every day to buy -- to get**
9 **drugs, or you didn't see that?**

10 A. Yes, yes.

11 Q. **That's true, right?**

12 A. Yes.

13 Q. **Do you know what a wake-up call is?**

14 A. Yes.

15 Q. **What's a wake-up call?**

16 A. That's something in terms that they use
17 before you -- I can't -- that's something in
18 terms that they use before you get on security
19 or something.

20 Q. **So in a way, it's a payment for someone**
21 **to assist in illegal narcotics operations; is**
22 **that right? Yes?**

23 A. Mm-hmm.

24 Q. **And so the drug dealers would give a**

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1 **wake-up call, say, to an individual and that**
2 **person would act as security for the narcotics**
3 **operations?**

4 A. Yes.

5 Q. And it -- again, I'm just focusing on
6 Ida B. Wells in that time period, 2000 until you
7 moved away in 2007.

8 You would have individuals who would be
9 actually selling the drugs on any given day,
10 right?

11 A. Yes.

12 Q. And then the sellers, they would have
13 lookouts who would be watching out for the
14 police, right?

15 A. Yes.

16 Q. And the drug dealers would also have
17 individuals who were also soliciting the sale of
18 the illegal -- illegal narcotics, right?

19 A. Yes.

20 Q. Where there -- they might be calling
21 out the names of certain drugs that are being
22 sold, right?

23 A. Yes.

24 Q. Like, you know, calling out, say, for

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1 **instance, you know, rocks or blows.**

2 **Have you ever heard that terminology?**

3 A. Yes.

4 Q. **What -- what are -- what are rocks?**

5 **What does that mean?**

6 A. It's a substance.

7 Q. **Is it -- are rocks -- is that crack**
8 **cocaine?**

9 A. Yes.

10 Q. **Okay. And what are -- what are blows?**

11 A. It's heroin.

12 Q. **And that's heroin that you could snort;**
13 **is that right?**

14 A. Either way.

15 Q. **Okay.**

16 A. Snort, shoot, whatever you want to do
17 with it.

18 Q. **Okay. And would you agree that when**
19 **police would arrive at the scene -- or strike**
20 **that.**

21 **Would you agree that when -- that**
22 **police were trying to catch people that were**
23 **involved in illegal narcotics activity at**
24 **Ida B. Wells?**

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1 MS. GIZZI: Objection, form.

2 BY THE WITNESS:

3 A. Yes.

4 BY MR. BAZAREK:

5 Q. **And would you agree that when the --**
6 **when the police would show up at the scene -- or**
7 **strike that.**

8 **Would you agree that when police would**
9 **arrive at Ida B. Wells and there was narcotics**
10 **activity going on, the presence of the police**
11 **would disrupt the illegal narcotics activity**
12 **that was occurring at Ida B. Wells?**

13 A. Yes.

14 Q. **And did you ever hear of the term**
15 **"cleanup"?**

16 A. Yes.

17 Q. **What does cleanup mean?**

18 A. It's a term that the police is coming.

19 Q. **And what's supposed to happen when**
20 **someone yells "cleanup"?**

21 A. I have seen a lot of people just run.

22 Q. **And whoever had the drugs, they are**
23 **going to hide the drugs, right?**

24 A. I -- I don't -- I don't -- I plead the

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1 Fifth. I don't -- they -- I don't know. I
2 really don't understand what you're saying.

3 Q. Okay. Well, let me ask you this: Have
4 you ever heard of a cleanup man?

5 A. A cleanup man?

6 Q. Yes.

7 A. Yeah.

8 Q. What's a cleanup man?

9 A. That's someone that uses drugs.

10 Q. But is a -- is a cleanup man, is that
11 someone who would -- if the police were in the
12 area would take the drugs and hide them?

13 A. I have no idea.

14 Q. Okay. Did you ever hear of a guy named
15 Van Jordan?

16 A. Who?

17 Q. Van Jordan?

18 A. No.

19 Q. Or his nickname was Velo (phonetic)?

20 A. No.

21 Q. Or he was a mechanic?

22 A. No.

23 Q. He was -- he was a guy that helped hide
24 the illegal narcotics?

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1 A. No.

2 Q. No? Okay.

3 Who was the biggest dope dealer in the
4 527 building at Ida B. Wells?

5 A. Couldn't tell you.

6 Q. Tell me who were some of the drug
7 dealers that sold illegal narcotics out of the
8 527 building.

9 A. Several.

10 Q. I'm sorry?

11 A. Several.

12 Q. Yeah. Who -- who are they?

13 A. I couldn't tell you their names.

14 Q. Well, Ben Baker was one of them, right?

15 A. Yes.

16 Q. How about Leonard Gibson, do you know
17 him?

18 A. Who?

19 Q. Leonard Gibson?

20 A. No.

21 Q. Fuzz?

22 A. No.

23 Q. You've never heard that name, Fuzz?

24 A. No. Fuzz? Yes. Fuzz, yeah.

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1 **Q. Well, he was a dope dealer out of the**
2 **527 building, right?**

3 A. It was several.

4 **Q. Right. But Leonard Gibson "Fuzz," he**
5 **was one of the dope dealers out of the 527**
6 **building, right?**

7 A. I --

8 MS. GIZZI: Objection, form.

9 Go ahead.

10 BY THE WITNESS:

11 A. I wouldn't know.

12 BY MR. BAZAREK:

13 **Q. Do you know Bobby Coleman?**

14 A. No.

15 **Q. Real big fella?**

16 A. No.

17 **Q. He's the -- he sold dope with Leonard**
18 **Gibson out of the 527 building and the 559**
19 **building.**

20 **You don't know them?**

21 A. No.

22 **Q. Well, you seem to recognize the name**
23 **Fuzz, right?**

24 A. Mm-hmm.

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1 **Q. Is that yes?**

2 A. Yes.

3 **Q. How do you know Fuzz?**

4 A. By the name.

5 **Q. But what do you -- what else do you**
6 **know about him other than his name?**

7 A. That's it.

8 **Q. At any time, did you ever observe Fuzz**
9 **selling illegal narcotics from the 527 building?**

10 A. No.

11 **Q. Have you ever worked for Fuzz?**

12 A. No.

13 **Q. Have you ever worked for Bobby Coleman?**

14 A. No.

15 **Q. What does working a pack mean?**

16 A. I guess you're selling it.

17 **Q. Selling what?**

18 A. The pack.

19 **Q. And is -- is the pack illegal**
20 **narcotics?**

21 A. Yes.

22 **Q. Okay. And that could be heroin,**
23 **correct?**

24 A. It could be anything.

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1 **Q. It -- but it could be heroin, correct?**

2 A. It could be anything.

3 **Q. Sir, could -- could it be heroin?**

4 A. It could be anything; coke, weed,
5 whatever.

6 **Q. Okay. It's some type of illegal
7 narcotics or --**

8 A. Yes.

9 **Q. -- cannabis, correct?**

10 A. Yes.

11 **Q. That's all I'm getting at.**

12 A. Okay. All right.

13 **Q. Okay. Have you ever worked a pack in
14 the 527 building?**

15 A. No.

16 **Q. Have you ever worked a pack at any
17 building at Ida B. Wells?**

18 A. No.

19 **Q. Where would you sell drugs at?**

20 A. I never sold drugs.

21 **Q. How many times have you -- strike that.
22 Have you ever acted as a lookout for
23 the drug dealers at Ida B. Wells?**

24 A. No. Only for Watts.

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1 **Q. You were a lookout for Watts?**

2 A. Yes. When he -- when he arrived in the
3 building, he -- if he didn't -- if you didn't --
4 if you didn't have nothing, he would have you
5 stand outside and direct the traffic in just to
6 get some arrests.

7 **Q. And how many times did that happen?**

8 A. Several.

9 **Q. Were -- were those "reverse stings;" do**
10 **you know? Did you ever hear that phrase?**

11 A. Pardon me?

12 **Q. Were those during reverse sting**
13 **narcotics operations?**

14 A. I don't understand you. What are you
15 saying?

16 **Q. Okay. Do -- where -- where police are**
17 **posing as narcotics dealers, and then people**
18 **would go up and try and buy a dime bag, that**
19 **type of thing, and they'd get arrested.**

20 A. Yeah.

21 **Q. Is that what you're talking about when**
22 **you'd act as a lookout?**

23 A. Mm-hmm.

24 **Q. Is that right?**

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1 A. For the police?

2 Q. **Yes.**

3 A. Yeah.

4 Q. Okay. So you were listed to act as a
5 lookout during these occasions where the police
6 would be acting like drug dealers and then
7 trying to arrest people who were seeking to buy
8 narcotics at Ida B. Wells; is that right?

9 A. Yes.

10 Q. Okay. Did you act as a lookout in any
11 other capacity other than that?

12 A. No.

13 Q. Okay. What about have you ever
14 solicited the sales of illegal narcotics at
15 Ida B. Wells?

16 A. Pardon me?

17 Q. Have you ever solicited the sales of
18 illegal narcotics at Ida B. Wells?

19 A. Yes.

20 Q. And how -- how do you go about doing
21 that?

22 A. Um, like I was just -- like I just
23 said, when Watts would make me stand out there.

24 Q. Okay. Was that security, or you were

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1 **soliciting too with --**

2 A. That was something like, you know,
3 security, something like that.

4 Q. Okay. But then you also -- you'll yell
5 out, like, where -- "Get your rocks. Get your
6 blows here." Right? Like, at a baseball
7 game-type thing, like -- right?

8 A. Yes.

9 Q. Except it's drugs at Ida B. Wells,
10 right?

11 A. Mm-hmm.

12 Q. Is that yes?

13 A. Yes.

14 Q. Okay. And then what -- what names
15 would you call out for soliciting the sale of
16 ille- -- illegal narcotics?

17 A. Oh, rocks, blows.

18 Q. Were there certain names of drug lines
19 at the 527 building?

20 A. Yeah.

21 Q. You know, one of -- one of the ones
22 I've heard is, like -- like, "knock-out" or
23 different -- different names.

24 What names do you remember being used?

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1 A. One was knock-out. One was, um -- wow.
2 I can't recall.

3 Q. How about, like, DNR? Have you ever
4 heard that one?

5 A. No.

6 Q. Okay. Like "damn near raw"?

7 A. Yeah. I --

8 Q. No?

9 A. Yeah.

10 Q. You heard that. Okay.

11 What about any of the other buildings?

12 Do you remember what the -- what the -- some of
13 the names of the drug lines were called?

14 A. No.

15 Q. From your observations, what building
16 do you think sold the best quality heroin at
17 Ida B. Wells?

18 A. I couldn't tell you.

19 Q. From your observation, what building at
20 Ida B. Wells sold -- or strike that.

21 From your observations, what building
22 at Ida B. Wells could you obtain the best
23 quality crack cocaine?

24 A. Couldn't tell you.

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1 **Q. Have you ever been addicted to any**
2 **illegal narcotics?**

3 A. Plead the Fifth.

4 **Q. Have you been addicted to heroin?**

5 A. Yes.

6 **Q. When?**

7 A. Years ago.

8 **Q. When was the last time you used heroin?**

9 A. Years ago.

10 **Q. Have you ever been addicted to crack**
11 **cocaine?**

12 A. No.

13 **Q. Have you ever used crack cocaine?**

14 A. No.

15 **Q. Have you ever been in any substance**
16 **abuse programs?**

17 A. Yes.

18 **Q. When?**

19 A. Maybe four or five years ago.

20 **Q. And where -- where was the program that**
21 **you went to?**

22 A. Intervention.

23 THE COURT REPORTER: Could you repeat that?

24 THE WITNESS: Intervention.

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1 BY MR. BAZAREK:

2 Q. **Is that Southwood Interventions?**

3 A. Yes.

4 Q. **And, sir, where was that located at?**

5 A. 57th and Wood.

6 Q. **And you went four or five years ago; is
7 that correct?**

8 A. Yes.

9 Q. **How long did you go for?**

10 A. Ninety days.

11 Q. **Was that treatment -- strike that.**

12 **Were you actually in the -- did you
13 actually live there?**

14 A. Yes.

15 Q. **Tell me how -- how -- tell me about
16 that.**

17 **How was it that you ended up living at
18 Southwood Interventions for 90 days?**

19 A. Because I wanted to be clean.

20 Q. **Clean from what?**

21 A. Heroin.

22 Q. **Other than those 90 days, did you ever
23 return to Southwood Intervention?**

24 A. Plead the Fifth.

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1 Q. How do -- how do -- okay.

2 I'm asking you about substance abuse
3 treatment.

4 A. Mm-hmm.

5 Q. How is -- how is that going to subject
6 you to some type of criminal prosecution?

7 A. It wouldn't.

8 Q. Okay. Okay. So -- but you're still
9 invoking the Fifth Amendment?

10 A. I --

11 Q. You're invoking -- you're invoking the
12 Fifth Amendment about other treatment with
13 respect --

14 A. Well, no, not really, because I think
15 that's my private --

16 Q. It's your what?

17 A. That's my private life.

18 Q. Well, you're -- are you -- are you
19 claiming emotional injuries in this case or not?

20 A. Pardon me?

21 Q. Are you claiming any emotional damages
22 in this case?

23 A. I don't understand what you're saying.

24 Q. Are you -- are you making any claims

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1 **for any type of emotional damages in this case?**

2 A. I don't understand the question you're
3 saying.

4 **Q. Do you suffer from depression, sir?**

5 A. No.

6 **Q. Do you suffer from anxiety?**

7 A. Maybe.

8 **Q. Have -- have -- has a doctor ever
9 diagnosed you with anxiety?**

10 A. Yes.

11 **Q. What doctor diagnosed you with anxiety?**

12 A. It's been a while.

13 **Q. Well, it -- it's not in your
14 interrogatory answers that you supplied under
15 penalty of perjury on February 12th, 2024.**

16 **So who is this doctor?**

17 A. Pardon me?

18 **Q. Who's the doctor that you went to for
19 the anxiety?**

20 A. I didn't go to no doctor.

21 **Q. Okay. Did some doctor diagnose you
22 with anxiety?**

23 A. No.

24 **Q. Okay. Have you ever been to a**

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1 **psychiatrist ever?**

2 A. No.

3 Q. **You hesitated there a minute.**

4 **Why -- why did you hesitate?**

5 A. Because I had -- I had to think.

6 Q. **Okay. Have you ever been to a**
7 **psychologist?**

8 A. No.

9 Q. **Have you ever been to a therapist?**

10 A. No.

11 Q. **Other than the substance abuse**
12 **treatment that you received from Southwood**
13 **Interventions, have you ever been -- had any**
14 **other substance abuse treatment?**

15 A. No.

16 Q. **Tell me -- what was your heroin use**
17 **before you went to -- or strike that.**

18 **You wanted to kick -- kick your heroin**
19 **habit, right?**

20 A. Mm-hmm.

21 Q. **Is that right?**

22 A. Yes.

23 Q. **And that's what led you to treatment at**
24 **Southwood Interventions, correct?**

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1 A. Yes.

2 Q. So -- so what was your use -- what was
3 your daily usage of heroin before you entered
4 into that three-month program?

5 A. Maybe a bag.

6 Q. You'd have one bag a day?

7 A. Yeah.

8 Q. Where would you get the bag from?

9 A. Wherever they sold it.

10 Q. Where did you get the money to buy your
11 daily bag of heroin?

12 A. Work on cars.

13 Q. What was that?

14 A. I work on cars, auto mechanic.

15 Q. Do you still work on cars?

16 A. No.

17 Q. When did you stop working on cars?

18 A. It's been a while.

19 Q. So the money that you would make from
20 working on cars, you would use that to buy your
21 heroin, right?

22 A. Yes.

23 Q. Would you get money from -- and
24 would -- strike that.

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1 **Would you get money from anyone else to**
2 **buy your heroin?**

3 A. No.

4 Q. **Would -- would -- Penny, would she give**
5 **you money to buy heroin?**

6 A. Sometimes.

7 Q. **Where would Penny get the money to give**
8 **you to buy --**

9 A. She worked.

10 Q. **Did Penny want you to go into the**
11 **program at Southwood Interventions?**

12 A. Yes.

13 Q. **And what -- what -- and why did she**
14 **want you to go into the program?**

15 A. Can we -- um, I really don't want to
16 talk about her.

17 Q. **Well, I -- what I'm trying to find out,**
18 **Mr. Young, is, you know, what was going on with**
19 **you before you went into the treatment program**
20 **for your heroin addiction. Okay?**

21 **So that's why I'm asking you these**
22 **questions. And I know it's -- it's sad your**
23 **wife passed away. But you're bringing claims**
24 **for emotional damages in this case, and so I'm**

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1 **allowed to ask you about things that were going**
2 **on in your life that would -- would cause you**
3 **some pain, emotional pain. That's why I'm**
4 **asking you these questions.**

5 **Do you understand that?**

6 A. Causing me pain now.

7 Q. **Yeah. It's -- is it painful to talk**
8 **about your heroin addiction? Is that what**
9 **you're telling --**

10 A. No.

11 Q. **What's -- what's painful?**

12 A. Talking about my wife.

13 Q. **Okay. But your -- your wife wanted you**
14 **to get clean, so to speak, right?**

15 A. Yes.

16 Q. **And you would agree that your heroin**
17 **use was causing problems with your relationship**
18 **with your wife, right?**

19 A. Plead the Fifth.

20 Q. **You're pleading the Fifth on that?**

21 A. Yes.

22 Can we take five minutes?

23 MR. BAZAREK: We can take a break.

24 MS. GIZZI: Thank you.

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1 (Simultaneous speakers.)

2 MR. BAZAREK: Now, let's just come -- you
3 know, let's take ten. Let's come back at --
4 what time is it now? 11:06?

5 Let's come back at 11:15. We're going
6 to go on break.

7 MS. GIZZI: Okay.

8 THE VIDEOGRAPHER: We're going off the record
9 at 11:06 a.m.

10 (Whereupon, a short break was
11 taken.)

12 THE VIDEOGRAPHER: We are back on the record
13 at 11:21 a.m.

14 BY MR. BAZAREK:

15 Q. Mr. Young, would your use of heroin
16 cause you to have relationship problems with
17 your children?

18 A. Yes.

19 Q. Please explain that.

20 A. They didn't like me doing it.

21 THE COURT REPORTER: Sorry. Could you repeat
22 that?

23 BY THE WITNESS:

24 A. They didn't like me doing it.

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1 BY MR. BAZAREK:

2 Q. And what would -- what would they say
3 about your heroin usage?

4 A. Ah, that I need to get clean.

5 Q. And did it make your kids sad that you
6 were using heroin?

7 A. Yes.

8 Q. What other ways did your heroin use
9 negatively affect your relationship with your
10 wife and your kids?

11 A. It wasn't good.

12 Q. It -- did it cause them pain?

13 A. Yes.

14 Q. And it caused you pain too, right?

15 A. Yes.

16 Q. You didn't want to see your wife and
17 your kids upset because you had an addiction to
18 heroin, right?

19 A. Yes.

20 Q. Now, I know you said it was four or
21 five years ago that you had the substance abuse
22 treatment.

23 Did you ever receive any type of
24 substance abuse treatment anywhere else?

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1 A. No.

2 Q. **When did you first start using heroin?**

3 A. When I was 18, 19.

4 Q. **And beginning when you were 18 or 19,**
5 **what was your usage of heroin back then?**

6 A. Same thing, about a bag.

7 Q. **And where would you -- where would you**
8 **get the money to buy the bag?**

9 A. Working on cars.

10 Q. **Would you get money at -- strike that.**

11 **Was there any other -- strike that.**

12 **Even when you were, you know, 18 and a**
13 **teenager, you were -- you were with Penny at**
14 **that point, right? You were in a relationship**
15 **with her?**

16 A. Yes.

17 Q. **Would -- would Penny give you money to**
18 **buy heroin --**

19 A. Yes.

20 Q. **-- when you were a teenager?**

21 **Yes?**

22 A. Yes.

23 Q. **Did -- would -- did Penny use heroin?**

24 A. No.

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1 Q. Had -- let me ask you this: Up until
2 you went to -- strike that.

3 Up until you went for treatment five or
4 six years ago from Interventions, were you using
5 heroin on a daily basis from the time you were a
6 teenager up to that point?

7 A. Yes.

8 Q. Did your -- you said your usage was a
9 bag a day.

10 Did you ever have more than a bag a day
11 of heroin?

12 A. Um, some days.

13 Q. And how -- how would it occur that some
14 days you would have more than one bag of heroin?

15 A. I would have enough money to get more.

16 Q. So say, for instance, you worked on
17 more cars. You had more money. You could buy
18 more heroin?

19 A. Mm-mmm, yes.

20 Q. Is that right?

21 A. Yes.

22 Q. What are the most bags of heroin you've
23 ever used in a single day?

24 A. Maybe three.

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1 Q. **And --**

2 A. I'm sorry.

3 Q. **Were -- I'm sorry. Did you -- did you**
4 **want to say something?**

5 A. No. My phone had ringed. I didn't
6 have it on mute.

7 Q. **Oh, no problem.**

8 **So I want to make sure I understand**
9 **your answer. So in -- the amount of heroin that**
10 **you would use on a daily basis would depend on**
11 **how much money you had to buy heroin?**

12 A. Yes.

13 Q. **Okay. And when you -- when you buy a**
14 **bag of heroin, I know there's inflation, but,**
15 **say, four or five years ago when you were buying**
16 **bags of heroin, how much would a -- one bag**
17 **cost?**

18 A. Maybe it'd be \$10.

19 Q. **Okay. And then when -- way back when**
20 **when you were a teenager and you started using**
21 **heroin, what would a bag cost then?**

22 A. Maybe 5.

23 Q. **Okay. So is it your testimony, sir,**
24 **you've been clean in terms of heroin use since**

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1 **you left the program at Interventions?**

2 A. No.

3 **Q. Okay. When was the last time you used**
4 **heroin?**

5 A. Yesterday.

6 **Q. And where did you buy the heroin from?**

7 A. From around this -- where I live at.

8 THE COURT REPORTER: Sorry?

9 THE WITNESS: Pardon me?

10 THE COURT REPORTER: Could you repeat that?

11 BY THE WITNESS:

12 A. From around where I live at.

13 BY MR. BAZAREK:

14 **Q. Where do you live at?**

15 A. I stay on the East Side.

16 **Q. All right. Who do you live with?**

17 A. My daughter.

18 **Q. Which daughter?**

19 A. Ah, Precious Young.

20 **Q. Do you ever live with anyone --**

21 A. Pardon me?

22 **Q. Do you live with anyone -- anyone else?**

23 A. Off and on.

24 **Q. Like -- no. Right now who are you**

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1 **living with beside Precious?**

2 A. I'm homeless. I just go there to take
3 a shower, change clothes.

4 **Q. Yeah.**

5 **How long have you been homeless?**

6 A. Since my wife died.

7 **Q. And where have you been -- other than**
8 **if you stay with Precious, where do you sleep at**
9 **night?**

10 A. I stay at the room with me and my
11 wife -- where we used to sleep at.

12 **Q. And where is that?**

13 A. In the bedroom.

14 **Q. But -- but where?**

15 A. At my daughter's house.

16 **Q. Okay. When you're not -- when you're**
17 **not at your daughter's house on the East Side,**
18 **where are you staying?**

19 A. Ah, here and there.

20 **Q. I mean, are you sleeping out in the**
21 **street --**

22 A. Yeah.

23 **Q. -- or at a shelter?**

24 A. Yeah.

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1 **Q. Where's the shelter?**

2 A. I don't go to shelters. Like, in a
3 garage or --

4 **Q. Just, like, a certain garage or
5 anywhere?**

6 A. Yeah, a certain garage.

7 **Q. Okay.**

8 A. Yeah, a certain garage.

9 **Q. Is it -- do --**

10 A. I go -- I have a -- I go to my
11 daughter -- this daughter -- this daughter, and
12 then I go to my son's house, you know.

13 **Q. No. I -- I get that. From time to
14 time you're living with relatives.**

15 **Your kids, right?**

16 A. Mm-hmm.

17 **Q. Is that right?**

18 A. Yes, sir.

19 **Q. But I'm talking about the other --
20 other times when you're not living with them.**

21 **Where are you sleeping at night?**

22 A. On -- in the streets.

23 **Q. Do you -- how do you get -- do you --
24 are you able to get any money?**

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1 A. No.

2 Q. I mean, are you out, like, panhandling,
3 so to speak, for money?

4 A. Yes.

5 Q. And where do you panhandle at?

6 A. On the side of the Dan Ryan.

7 Q. And how long have you been doing that?

8 A. Since my wife died.

9 Q. And do you do -- are you panhandling
10 every day?

11 A. Yeah.

12 Q. Yeah. And the money that you get
13 from -- and do you -- do you get money from
14 panhandling?

15 A. Yes.

16 Q. And the money that you get from
17 panhandling, do you use that to purchase heroin?

18 A. Yes.

19 Q. Have you been using heroin on a daily
20 basis since your wife passed away?

21 A. Yes.

22 Q. Do you have any heroin with you right
23 now?

24 A. No.

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1 **Q. What time was it yesterday when you**
2 **used heroin?**

3 A. I think about 10:00.

4 **Q. And how much did you -- and it was one**
5 **bag you used yesterday?**

6 A. Yes.

7 **Q. And how much did you pay for that bag?**

8 A. \$10.

9 **Q. And the \$10 that you paid for the bag**
10 **you bought yesterday, was it money you received**
11 **from panhandling?**

12 A. (Zoom audio distortion.)

13 **Q. Is that yes?**

14 A. Yes.

15 **Q. Do your kids know that you're still**
16 **using heroin?**

17 A. Yes.

18 **Q. And is that causing problems in your**
19 **relationship with your kids?**

20 A. Yes.

21 **Q. Okay. And do your kids have children?**

22 A. Yes.

23 **Q. And so you have grandchildren, right?**

24 A. Yes.

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1 Q. **And does your heroin use -- does that**
2 **negatively affect your relationship with your**
3 **grandchildren?**

4 A. Yes.

5 Q. **Would you say most of the problems in**
6 **your adult life have been caused by your use of**
7 **heroin?**

8 A. Yes.

9 Q. **Do you have any plans to get more**
10 **treatment for your heroin addiction?**

11 A. Yes.

12 Q. **But what are -- what are the plans?**

13 A. I'm going to go get on a methadone
14 program.

15 Q. **All right. And how -- which methadone**
16 **program are you going to get into?**

17 A. At 75th and Jeffrey.

18 Q. **And have you applied to get into that**
19 **program?**

20 A. Well, I just got to be reinstated.

21 Q. **I'm sorry?**

22 A. I have to go make an appointment.

23 Q. **Okay. And what's at 75th and Jeffrey?**
24 **What type of program is that?**

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1 A. It's a methadone program, ICI.

2 Q. **Did you say ICI?**

3 A. Yeah.

4 Q. **What does that stand for?**

5 A. Ah, I couldn't -- I don't know.

6 Q. **Okay. How did you learn of that**
7 **program?**

8 A. Um, talking to people.

9 Q. **Is it -- is it supposed to be a pretty**
10 **good program?**

11 A. Yes.

12 Q. **Okay. Are you -- are you hopeful that**
13 **you can finally kick your heroin addiction?**

14 A. Yes.

15 Q. **Do you think if you kick- -- kicked**
16 **your heroin addiction things would be much**
17 **better in your relationship with your -- your**
18 **kids and your grandchildren?**

19 A. Yes, sure.

20 Q. **And it would be better for you too,**
21 **right?**

22 A. Yes.

23 Q. **Well, you know, earlier in the**
24 **deposition I -- I asked you a question about a**

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1 guy named Van Jordan. And I have a different
2 nickname. I want to ask you if you know this
3 person. His nickname was V House.

4 Did you know anyone -- did you know
5 anyone named V House?

6 A. Yes.

7 Q. He was a mechanic too, right?

8 A. Well, I never seen him work on cars.

9 Q. Yeah.

10 What do you -- what do you know about
11 V House?

12 A. Just being around.

13 Q. Was he someone you knew from
14 Ida B. Wells?

15 A. Yes.

16 Q. Was he someone who engaged in illegal
17 narcotics activity at Ida B. Wells?

18 A. Yes.

19 Q. And was he a drug dealer?

20 A. I don't know.

21 Q. What -- okay. What -- was he a cleanup
22 man? Was V House a cleanup- -- was V House a
23 cleanup man?

24 A. No.

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1 Q. Okay.

2 A. He was just a user.

3 Q. He was what?

4 A. He was a user.

5 | Q. He was a user. Okay.

6 So he wasn't someone that the drug

7 dealers would trust to hide narcotics, if you

8 | know?

9 A. No.

Q. Okay.

11 A. I don't know.

12 Q. Okay. Since you were 18 years old --

13 or strike that.

14 During the 90 days you were in the
15 program at Interventions, did you use heroin at
16 all during that time?

17 A. No.

Q. Did they let you leave the facility?

19 A. Yes.

20 Q. And -- okay.

21 So you wouldn't go out and try and

22 score some heroin?

23 A. No.

24 Q. Okay. During the time that you were in

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1 **Interventions, was that the only time in your**
2 **adult life that you were not using heroin?**

3 A. Yes.

4 Q. Okay. Give me a second.

5 **Do you know someone named Gregory**
6 **Haynes?**

7 A. No.

8 Q. I'm going to -- I'm going to take you
9 back, sir, to March 2nd, 2003. Okay?

10 A. Mm-hmm.

11 Q. And that's almost 21 years ago, right?

12 A. Yes.

13 Q. Do you remember that day?

14 A. No.

15 Q. Well, you're -- you're -- you're
16 bringing a lawsuit against current and former
17 members of the Chicago Police Department, right?

18 A. Yes.

19 Q. And the City of Chicago, right?

20 A. Yes.

21 Q. And you're bringing a lawsuit over a
22 particular arrest, right?

23 A. Yes.

24 Q. Okay. What do you remember about that

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1 **arrest?**

2 A. I was incarcerated.

3 **Q. What about the actual arrest? Do you**
4 **remember anything about it?**

5 A. Actually, yeah. But I'd prefer not to
6 talk about it.

7 **Q. Did you say you'd prefer not to talk**
8 **about it?**

9 A. No. I could.

10 Can you ask me that question again?

11 **Q. Sure.**

12 **What do you remember -- or strike that.**
13 **Tell me everything you remember about**
14 **your March 2, 2003 arrest.**

15 A. Actually, I remember, um, my wife's
16 door being kicked in and I -- me getting locked
17 up.

18 **Q. So the door was actually kicked in?**

19 A. Yes.

20 **Q. You didn't open up the door and let the**
21 **police in?**

22 A. No.

23 **Q. Is that your testimony?**

24 A. Yes.

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1 Q. That's your testimony, right?

2 A. Yes.

3 Q. Okay. Let me -- I want to -- I do want
4 to take a step back.

5 Before the door got kicked in, what
6 were you doing?

7 A. Ah, I was in the house.

8 Q. And when you say you were in the house,
9 you were at 527 East Browning?

10 A. Yes.

11 | Q. Apartment 102?

12 A. Yes.

13 MR. BAZAREK: Okay. Can we -- can we go off
14 the record for one second?

15 MS. GIZZI: Sure.

16 THE VIDEOGRAPHER: Standby.

17 We're going off the record at
18 11:40 a.m.

19 (Whereupon, a discussion was had
20 off the record.)

21 THE VIDEOGRAPHER: We're back on the record
22 at 11:42 a.m.

23 BY MR. BAZAREK:

24 Q. Okay. Mr. Young, before the police

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1 **kicked in the door, had you been outside of**
2 **Apartment 102 that day?**

3 A. Yes.

4 Q. **And what were you doing outside that**
5 **day?**

6 A. Standing in front of the building.

7 Q. **In front of the 527 building?**

8 A. Yes.

9 Q. **And who were you with?**

10 A. Me and my kids.

11 Q. **Or which kids were you with that day**
12 **outside the building?**

13 A. Well, Corey and Greg.

14 Q. **Your two sons, right?**

15 A. Yes.

16 Q. **Was there school that day?**

17 A. Pardon me?

18 Q. **Was there school that day?**

19 A. I can't recall.

20 THE COURT REPORTER: Sorry?

21 BY THE WITNESS:

22 A. I can't recall.

23 BY MR. BAZAREK:

24 Q. **Well, in March of 2003, where was Corey**

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1 **going to school?**

2 A. He's going to CVS on -- it -- it's a
3 private school.

4 **Q. And where was the school at?**

5 A. Pardon me?

6 **Q. Where was the school at?**

7 A. I believe -- I can't re- -- I think it
8 was on 80-something.

9 **Q. Okay.**

10 A. The school bus used to come get him.

11 **Q. And what about Gregory?**

12 A. He went to Dolittle.

13 **Q. And it's your testimony you don't know
14 what day of the week that was?**

15 A. No.

16 **Q. March 2, 2003?**

17 A. No.

18 **Q. Okay. What's the first thing you
19 remember about that day on March 2nd, 2003?**

20 A. I had went in the house, and if I can
21 recall, I was cooking my kids something to eat,
22 and --

23 **Q. I'm sorry. Did you -- I'm sorry. Go
24 ahead.**

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1 A. I had went in the house, and I was
2 cooking my kids something to eat.

3 Q. **Did you say you ran into the house?**

4 A. No. I said I went into the house.

5 Q. **Okay. Well, let me -- let's -- I want**
6 **to go back out, though.**

7 **And you said you were outside with**
8 **Gregory and Corey, right?**

9 A. Yes.

10 Q. **And what were you doing outside**
11 **together?**

12 A. We were standing outside playing
13 football.

14 Q. **And who all -- anyone else playing**
15 **football other than you and Gregory and Corey?**

16 A. The rest of the kids.

17 Q. **The what?**

18 A. The rest of the kids.

19 Q. **Who -- who were the rest of the kids?**

20 A. The kids that stayed in the building.

21 Q. **Are you -- you're talking about -- are**
22 **you talking about your children?**

23 A. Yes.

24 Q. **Okay. Where was Penny?**

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1 A. And other kids that stayed in the
2 building too.

3 Q. **Were Ben Baker's kids out there?**

4 A. Yes.

5 Q. **Where -- was Penny outside?**

6 A. No. Penny was at work, I believe.

7 Q. **Okay. Well, on -- on March 2nd, 2003,**
8 **you were still using heroin on a daily basis,**
9 **right?**

10 A. Yes.

11 Q. **And how many bags of heroin did you**
12 **have with you that day?**

13 A. I can't recall.

14 Q. **How many bags of heroin did you snort**
15 **that day?**

16 A. I can't recall.

17 Q. **What was your routine back in 2003 as**
18 **to when you would snort your heroin?**

19 A. Like, in the evening whenever I'd get
20 the money.

21 Q. **So you would -- you wouldn't just --**
22 **when you wake up in the morning you wouldn't**
23 **snort a bag?**

24 A. No.

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1 **Q. You'd have to work that day to make**
2 **some money so then you could buy your heroin in**
3 **the evening.**

4 **Is that your testimony?**

5 **A. Yes.**

6 **Q. Okay. So during March of 2003,**
7 **what were you doing for work --**

8 **A. I'm thinking I --**

9 **Q. -- to buy --**

10 **A. I'm thinking I put a starter on a car**
11 **or something.**

12 **Q. Put a what?**

13 **A. Starter on a car.**

14 **Q. Are you saying you put a starter on the**
15 **car on March 2, 2003?**

16 **A. Yeah, that.**

17 **Q. Okay. What time did you start work on**
18 **the car that day?**

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

20 **Q. Whose -- whose car was it that you**
21 **worked on on March 2nd, 2003?**

22 **A. It was a guy's car had stopped out**
23 **there in the -- in the parking lot.**

24 **Q. Yeah. Do you know what -- so was that**

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1 **in the morning time, or was it later in the**
2 **afternoon?**

3 A. I can't recall.

4 Q. **Well, let me ask you this: Did you**
5 **work on the car before you were arrested that**
6 **day?**

7 A. Yes.

8 Q. **Okay. And what type of tools did you**
9 **use on that day to fix the car?**

10 A. A ratchet and a socket.

11 Q. **Yeah. And where did you get the**
12 **starter there -- to put on the car?**

13 A. No. He went and bought it.

14 Q. **Okay. And do -- do you remember the**
15 **fella's name?**

16 A. No.

17 Q. **How was it arranged that you were going**
18 **to put a new starter on his car on March 2,**
19 **2003?**

20 A. Because when I came out the house, he
21 was out there trying to start his car.

22 Q. **Oh, okay. So you saw -- you saw this**
23 **guy trying to fix his car?**

24 A. Mm-hmm.

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1 **Q. Is that right?**

2 A. Yes.

3 **Q. And so what did you do? You just**
4 **walked to up to him?**

5 A. Yes. And I said, "Man, it's probably
6 your starter."

7 **Q. And I'm just trying to picture this:**
8 **Was the hood up of the car and you go over**
9 **there?**

10 A. Yes.

11 **Q. Okay.**

12 A. The hood was up.

13 **Q. And then he already had the new part,**
14 **or he had to go get the part?**

15 A. No. He had to go get the part.

16 **Q. Okay. So you -- you assessed what the**
17 **problem was with the car, right?**

18 A. Yes.

19 **Q. And then you told him, "Hey, I need --**
20 **you need a new starter," right?**

21 A. Yes.

22 **Q. Okay. And then what did he -- he**
23 **walked to the car part store, or how did he get**
24 **the new starter?**

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1 A. Well, it was an auto part store right
2 there in Lake Meadows.

3 Q. **So did -- was his car even drivable at**
4 **that point, or he just walked away to --**

5 A. Well, he walked --

6 Q. **-- like --**

7 A. It was, like, a block away, the auto
8 part store.

9 Q. **Okay. And then how long was he gone?**

10 A. Maybe about an hour.

11 Q. **Okay. And then he comes back with the**
12 **new part?**

13 A. Yes.

14 Q. **Okay. And then what happened?**

15 A. I took the whole starter off, and I put
16 the new one on, and he had to get a jump,
17 because he had ran the battery down. And the
18 car started up, and I charged him the \$30.

19 Q. **So it sounds like you have a really**
20 **good memory of that day, right?**

21 A. Pardon me?

22 Q. **It sounds like you have a really good**
23 **memory of that day.**

24 A. Somewhat.

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1 Q. Yeah. And did you ever see that person
2 again?

3 A. No.

4 Q. Okay. And then he gave you \$30 for the
5 work, right?

6 A. Yes.

7 Q. All right. All right. How long did it
8 take -- take you to replace the starter on the
9 car?

10 A. Maybe about an hour, hour and a half,
11 yeah.

12 Q. And then you said his car needed a jump
13 too?

14 A. Yes.

15 Q. And how -- how did he get a jump?

16 A. He went and asked another guy who was
17 in the parking lot.

18 (Mr. Palles re-entered the
19 Zoom.)

20 THE COURT REPORTER: Could you repeat that?
21 It cut out.

22 THE WITNESS: Oh.

23 MR. PALLE: Yeah. Sorry, guys. I got cut
24 off. I'm back in.

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1 BY THE WITNESS:

2 A. He went after -- he went after another
3 guy in the parking lot, could he give him a
4 jump.

5 BY MR. BAZAREK:

6 Q. **Okay. And so someone had jumper cables**
7 **to jump his car?**

8 A. Yeah.

9 Q. **Okay.**

10 A. Yeah, we had them.

11 Q. **Did you help with that?**

12 A. Yeah.

13 Q. **With the start --**

14 A. I hooked the cables --

15 Q. **Is that --**

16 **(Simultaneous speakers.)**

17 THE COURT REPORTER: Sorry?

18 BY THE WITNESS:

19 A. I'm the one who hooked the cables up.

20 BY MR. BAZAREK:

21 Q. **Okay. And do you remember what type of**
22 **car it was that you repaired that day?**

23 A. No. I can't recall.

24 Q. **Okay. During the time that you were**

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1 **working on the car, were -- were your -- were**
2 **your kids outside?**

3 A. Yes. They was in front of the
4 building.

5 Q. **Okay. And is that where you worked on**
6 **the car, in front of the building?**

7 A. No. He was in the back. I was in the
8 back.

9 Q. **Okay. On that day -- I know you're**
10 **busy working on the car, but did you see people**
11 **coming into Ida B. Wells to buy illegal**
12 **narcotics that day?**

13 A. Yeah.

14 Q. **Yeah. And -- and they were there to**
15 **get illegal narcotics at the 527 building,**
16 **right?**

17 A. Mm-hmm, yeah.

18 Q. **Okay. Did you see Ben Baker out there**
19 **that day selling drugs?**

20 A. Ah, I can't recall.

21 Q. **Is that something you would see over**
22 **the years, Ben Baker selling nar- -- illegal**
23 **narcotics at the 527 building?**

24 A. Um, sometimes.

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1 **Q. Yeah. I understand Ben Baker, he**
2 **testified that he would actually sell illegal**
3 **narcotics out of the apartment that he lived in**
4 **at Apartment 206. And, you know, his customers**
5 **who wanted to buy drugs would just knock on his**
6 **door to buy drugs, and he'd sell them drugs.**

7 **Did you ever do that?**

8 **A. No.**

9 **Q. You never bought heroin from Ben Baker?**

10 **A. I mean, he gave me one before.**

11 **Q. Yeah. Have you ever been in Ben**
12 **Baker's apartment, 206, when he lived there with**
13 **Clarissa and his -- his boys?**

14 **A. Yeah.**

15 **Q. And would you consider Ben Baker a**
16 **friend?**

17 **A. Somewhat.**

18 **Q. Yeah. And what -- when you were at the**
19 **Baker residence, what types of things would you**
20 **do there?**

21 **A. Um, I would take out their garbage.**

22 You know what I'm saying? My kids would play
23 with his kids. They would come down there and
24 ask me, can they come up.

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1 **Q. Yeah. And when you said "take out the**
2 **garbage" --**

3 A. Yeah.

4 **Q. -- did you do work for Ben Baker?**

5 A. Yeah.

6 **Q. Yeah. What -- what other things would**
7 **you do for Ben Baker beside take his garbage**
8 **out?**

9 A. Wash his car, things like that.

10 **Q. Yeah. Would you fix his car, too?**

11 A. Sometimes.

12 **Q. Yeah. Did Ben Baker ever pay you money**
13 **to fix his car and wash his car?**

14 A. Yeah.

15 **Q. Yeah.**

16 THE VIDEOGRAPHER: Sorry to interrupt. If we
17 can get his camera adjusted down, he's cut off
18 from the nose down there.

19 MR. BAZAREK: Thank you.

20 THE VIDEOGRAPHER: Awesome. Thank you.

21 MS. GIZZI: We will move the mic closer too.
22 There.

23 BY MR. BAZAREK:

24 **Q. And the money that Ben Baker would pay**

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1 **you, would you use that money to buy heroin?**

2 A. Yes.

3 **Q. Did Ben Baker ever ask you to assist**
4 **him in his illegal narcotics operations?**

5 A. Yes.

6 **Q. And what types of things would you do**
7 **for Ben Baker and his illegal narcotics**
8 **operation?**

9 A. Well, he -- he asked me one day, would
10 I work for him. And I told him no.

11 **Q. When you say he wanted you to work for**
12 **him, you've already testified, you know, of**
13 **washing the car, fixing the car.**

14 **You're talking about to help him in his**
15 **drug dealing?**

16 A. Yes.

17 **Q. Okay. And when did Ben Baker ask you**
18 **to assist him in his drug dealing?**

19 A. I can't recall.

20 **Q. Yeah. Was it before your March 2nd,**
21 **2003 arrest or after?**

22 A. I can't recall.

23 **Q. Okay. Do you know -- do you remember a**
24 **guy named Jamar Lewis? Do you know that name?**

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1 A. No.

2 Q. **His nickname was Tweet.**

3 A. Yeah.

4 Q. **Do you know Tweet?**

5 A. I know --

6 Q. **He was friends with Ben Baker.**

7 Q. **Do you remember him?**

8 A. Yes. I know Tweet.

9 Q. **Okay. And Tweet, do you know him as**
10 **Jamar Lewis, or do you just know him as Tweet?**

11 A. I just know him as Tweet.

12 Q. **Okay. And Tweet was a drug dealer too,**
13 **right?**

14 A. Yes.

15 Q. **And Tweet was a drug dealer at the 527**
16 **building?**

17 A. Yes.

18 Q. **Yeah. Was Tweet -- was he business**
19 **partners with Ben Baker --**

20 A. I --

21 Q. **-- for illegal narcotics operations at**
22 **Ida B. Wells?**

23 THE COURT REPORTER: Sorry. Sir --

24 BY THE WITNESS:

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1 A. I wouldn't know.

2 THE COURT REPORTER: -- you cut out his
3 question when you answered.

4 THE WITNESS: Pardon me?

5 MS. GIZZI: Wait for him to finish.

6 MR. BAZAREK: Okay. I'll ask --

7 THE WITNESS: Oh, I apologize.

8 MR. BAZAREK: Yeah. I'll ask another
9 question.

10 BY MR. BAZAREK:

11 Q. **Did you ever see Tweet and Ben Baker
12 together?**

13 A. Sure.

14 Q. **Yeah. And then you said there were
15 times where you'd go to Ben Baker's apartment.**

16 **Would Tweet be there?**

17 A. Sometimes.

18 Q. **Yeah. And I know Ben Baker has
19 testified he liked to smoke marijuana.**

20 **Did you ever, like, smoke marijuana
21 with him in his apartment?**

22 A. No.

23 Q. **Okay. To your knowledge, were -- Tweet
24 and Ben Baker, were they, like, partners in a**

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1 **drug dealing business at Ida B. Wells?**

2 A. I never seen it. I know they was
3 friends.

4 Q. **Okay. How about -- do you know someone**
5 **named Elgin Moore? Elgin Moore, do you know**
6 **that name?**

7 A. No.

8 Q. **Okay. How about Bryant Patrick, do you**
9 **know someone named Bryant Patrick?**

10 A. No.

11 Q. **Okay. In March of 2003, where would**
12 **you -- where would you go to buy the heroin that**
13 **you would snort?**

14 A. Um, in the next building.

15 Q. **Which building?**

16 A. I believe it was 540.

17 Q. **The 540 building?**

18 A. Yes.

19 Q. **Okay. So why would you go to that**
20 **building to buy heroin versus other buildings**
21 **within Ida B. Wells?**

22 A. Because I -- I wouldn't want to
23 purchase in front of my kids.

24 Q. **Was the quality of the heroin sold at**

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1 **the 540 building better than the quality of the**
2 **heroin sold out of the 527 building?**

3 A. I wouldn't know.

4 Q. Okay. Who were -- who were the drug
5 **dealers at the 540 building?**

6 A. Oh, it was several people.

7 Q. Do you -- do you remember any of their
8 **names?**

9 A. No.

10 Q. **How about nicknames?**

11 A. Um, Rat, a guy they used to call Rat.

12 Q. **Rat. Rat?**

13 A. Yeah.

14 Q. **Okay. Is he still around, Mr. Rat?**

15 A. I don't know.

16 Q. **Okay. You know, I've heard -- are**
17 **there gatherings of people that used to live in**
18 **Ida B. Wells, like, an annual picnic-type thing?**

19 A. Yeah.

20 Q. **And do you -- do you go there?**

21 A. No.

22 Q. **Okay. So, anyway, going back to the --**
23 **to March 2nd. All right.**

24 **You fix the car?**

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1 A. Yeah.

2 Q. **And you got your \$30, right, from --**

3 THE COURT REPORTER: I'm sorry. Could you
4 wait until he finishes his questions? I'm so
5 sorry.

6 BY MR. BAZAREK:

7 Q. **Yeah. You got -- you got -- you got**
8 **your \$30 in your pocket that you -- that you**
9 **received as payment, right?**

10 A. Right.

11 Q. **And then as soon as you got the \$30,**
12 **did you go looking to buy some heroin?**

13 A. Yes.

14 Q. **And did you -- did you go right to the**
15 **540 building to get it?**

16 A. Yes.

17 Q. **And then what -- did you -- did you --**
18 **on March 2nd, 2003, did you buy the heroin at**
19 **the 540 building?**

20 A. Yes.

21 Q. **Okay. And do you know about what time**
22 **it was when you bought the heroin at the 540**
23 **building?**

24 A. No.

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1 Q. How much time was it -- strike that.

2 How much time elapsed from after you
3 got the \$30 payment until you bought the heroin
4 at the 540 building?

5 A. I can't recall.

6 Q. You -- did you buy the heroin at the
7 540 building before you were arrested?

8 A. I can't recall.

9 Q. Well, you didn't buy heroin after you
10 were arrested that day, right?

11 A. Right.

12 Q. So you -- if you were buying heroin,
13 you had to buy it before you were arrested,
14 right?

15 A. Yes.

16 Q. Okay. How many bags of heroin did you
17 buy on March 2nd, 2003?

18 A. Two.

19 Q. Okay. And what did you do with the two
20 bags of heroin that you bought?

21 A. Ah, I snorted them.

22 Q. And when you -- when you snorted the
23 heroin, do you use a straw?

24 A. Yes.

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1 **Q. Where -- where were you when you**
2 **snorted heroin on March 2, 2003?**

3 A. I snorted it before I came out the
4 building.

5 **Q. Well, you -- did you buy the -- you**
6 **bought the heroin, though, after you fixed the**
7 **car, right?**

8 A. Yes.

9 **Q. Okay. Yeah. I'm just trying to figure**
10 **out at -- where are you when you're snorting the**
11 **heroin -- the two bags of heroin that you bought**
12 **that day?**

13 A. I stood in the building in the hallway.

14 **Q. Which building?**

15 A. 540.

16 **Q. Oh, I see.**

17 **And your kids are, like, playing**
18 **outside with Baker's kids?**

19 A. Yeah, as I recall.

20 **Q. And they're outside the 527 building?**

21 A. Yes.

22 **Q. And you're over at the 540 building**
23 **snorting heroin, right?**

24 A. Yes.

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1 **Q. Okay. Were you with anyone when you**
2 **were snorting the heroin?**

3 A. No.

4 **Q. Did you have to wait in line to be**
5 **served the heroin that day?**

6 A. No.

7 **Q. There were no other people lined up to**
8 **buy heroin?**

9 A. No.

10 **Q. Where was -- where was Rat selling the**
11 **heroin from that day?**

12 A. Um, back in the hallway.

13 **Q. Okay.**

14 A. There's two sides of the hallway. So
15 he was on one side.

16 **Q. And so there were no other customers to**
17 **buy heroin. You just walked up. You were the**
18 **only person?**

19 A. Well, not really.

20 **Q. Well, tell me how -- tell me --**

21 A. It was -- it was people coming in and
22 out of the building. So I wasn't --

23 **Q. Okay.**

24 A. -- the only.

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1 Q. I see.

2 So they could have been getting served
3 and they're leaving, right?

4 A. Yeah.

5 Q. Okay. Were there -- did you see
6 dope -- or strike that.

7 Did you see security that day for the
8 540 building?

9 A. Yeah.

10 Q. Yeah. And there were -- what about
11 were any -- was the drug line being called out
12 for the 540 building?

13 A. Yeah.

14 Q. And what was being called out?

15 A. Um, I can't recall.

16 Q. Okay. Had -- had you ever done
17 security, acted as a lookout, or soliciting at
18 the 540 building?

19 A. No.

20 Q. All right. So you never worked that
21 building, but that was the place you would go to
22 buy heroin, right?

23 A. Yes.

24 Q. Is that right?

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1 A. Yes.

2 Q. Okay. And **what was the distance from**
3 **the 540 building where you bought the heroin to**
4 **where your kids were playing at the 527**
5 **building?**

6 A. Maybe 50 feet or something.

7 Q. **Oh, really close, right?**

8 A. Mm-hmm.

9 Q. **Is that right?**

10 A. Yes.

11 Q. **So when you were -- when you were using**
12 **the heroin, could you actually see where your**
13 **kids were outside playing?**

14 A. No.

15 Q. **And why is that?**

16 A. Because I was in the building.

17 Q. Okay. All right. So you snort your
18 **two bags of heroin?**

19 A. Mm-hmm.

20 Q. **What happened next?**

21 A. We went -- I came out the building, and
22 I told my kids -- my kids came to me, "Daddy,
23 I'm hungry."

24 So we went in the house. I fixed them

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1 something to eat, and then the next thing I
2 know, the door was getting kicked in.

3 Q. Yeah. Were you -- were you getting the
4 kids -- and they said they wanted something to
5 eat.

6 Were you getting them -- was it
7 breakfast? Was it lunch? Do you remember which
8 meal?

9 A. I can't recall.

10 Q. Okay. So if I -- I want to understand
11 it. So you -- you get the heroin. The kids --
12 kids tell you -- or I'm sorry.

13 You use the heroin -- You use the two
14 bags of heroin.

15 A. Mm-hmm.

16 Q. You walk by. The kids tell you -- tell
17 you they're hungry, right?

18 A. Mm-hmm.

19 Q. Is that right?

20 A. Yes.

21 Q. And then immediately do you go back
22 into your apartment with your kids so you can
23 fix them a meal?

24 A. Yes.

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1 Q. Okay. And so then when you're -- at
2 that point, you are under the influence of
3 heroin, right?

4 A. Yes.

5 Q. Okay. And as you walk back to
6 Apartment 102 with your kids did you see police
7 anywhere?

8 A. No.

9 Q. All right. And then when you go to
10 the -- back into the Apartment 102, you start
11 fixing your kids a meal; is that right?

12 A. Yes.

13 Q. Okay. Well, do you remember what the
14 meal was that you were fixing them?

15 A. I can't recall.

16 Q. Okay. And then how long are you back
17 in the apartment with your kids, do you hear the
18 sound of someone kicking at your door?

19 A. Maybe about an hour or so. I can't
20 recall.

21 Q. Are you guessing, or you think it was
22 approximately an hour?

23 A. I can't recall. I can't recall.

24 Q. Okay. So could it have been a much

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1 **shorter time period?**

2 A. Um, I can't recall.

3 Q. **Okay. Were you ever -- before you went**
4 **back into Apartment 102 to go with the kids to**
5 **fix them something to eat, were you ever running**
6 **outside?**

7 A. No.

8 Q. **And it's your testimony on that day**
9 **where you're working on the car, you go to --**
10 **and then you go to the 540 building to buy the**
11 **heroin, and then you go back into your apartment**
12 **with your kids.**

13 **At no time did you see any police; is**
14 **that right?**

15 A. No.

16 Q. **Is that correct?**

17 A. Correct.

18 Q. **That's correct. Okay.**

19 **And before the door is kicked in,**
20 **what are you -- what are you hearing?**

21 A. Ah, well, a lot of footsteps or
22 something.

23 Q. **And you're hearing it through a closed**
24 **door?**

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1 A. Yeah. Because my door is --

2 Q. **Was the --**

3 A. -- by the hallway.

4 Q. **I'm sorry?**

5 THE COURT REPORTER: I'm sorry? I didn't --

6 BY THE WITNESS:

7 A. My door is right by the hallway.

8 BY MR. BAZAREK:

9 Q. **And so what -- tell me exactly what it**
10 **is that you're hearing.**

11 A. Just noise.

12 Q. **Right. But what -- was it -- was it**
13 **yelling? Was it muffled? Was it -- you could**
14 **hear words being spoken? Like, what are you**
15 **hearing?**

16 A. Ah, I can't recall.

17 Q. **Are you -- is anyone saying "police"?**

18 A. Pardon me?

19 Q. **Is anyone saying "police"?**

20 A. No.

21 Q. **No. Okay.**

22 **So you just -- you just hear noise?**

23 A. Yeah.

24 Q. **Okay.**

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1 A. Like always.

2 Q. Okay. So did you think any of that --
3 think anything of that, or it's just regular
4 noise that you hear every day?

5 A. It's regular noise you hear every day.

6 Q. Okay. So you're there.

7 Are you actually cook -- like, cooking
8 breakfast, or you're making -- pouring cereal,
9 or what are you doing?

10 A. I can't -- I can't recall. I think I
11 was boiling hot dogs or something. I don't
12 know.

13 Q. Okay. All right.

14 And -- but then at some point you hear
15 noise on your -- on your door?

16 A. Yeah.

17 Q. What's the door made of?

18 A. Ah, wood.

19 Q. And was the door locked shut?

20 A. Yes.

21 Q. Okay. What's the noise you hear at
22 your door?

23 A. I didn't hear no noise at my door. I
24 heard the noise in the hallway.

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1 Q. **Yeah. Okay. Then, what happened?**

2 A. Then all I know, my door was getting
3 kicked in.

4 Q. **Did you hear -- did you hear anyone say**
5 **"police" or anything like that at the door?**

6 A. No.

7 Q. **Okay. So it's your testimony that the**
8 **door was kicked in; is that right?**

9 A. Yes.

10 Q. **Did you ever tell anyone you opened the**
11 **door to let the police in?**

12 A. I can't recall.

13 Q. **Is it possible you did open a door to**
14 **let the police in?**

15 A. I don't -- I can't recall.

16 Q. **Is it possible that you were running**
17 **back into your apartment and the police were in**
18 **pursuit of you?**

19 A. No.

20 Q. **You don't remember that, or you know**
21 **that didn't happen?**

22 A. I know that didn't happen.

23 Q. **Okay. So out of all the people that**
24 **are living in Ida B. Wells that day, why do you**

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1 **think the police are coming to your apartment to**
2 **kick your door in?**

3 A. Ah, I couldn't answer that question.

4 Q. **Did you ever think about that?**

5 A. Yeah.

6 Q. **Did you hear of the police coming in**
7 **anyone else's apartment on that day?**

8 A. Yeah. I can't recall.

9 Q. **Yeah. Prior to March 2, 2003, did you**
10 **ever have any contact with Alvin Jones?**

11 A. Who?

12 Q. **With -- do you know anyone named Alvin**
13 **Jones?**

14 A. No.

15 Q. **Okay. Do you know anyone named Kenneth**
16 **Young?**

17 A. No.

18 Q. **Okay. How about Darrell Edwards? Do**
19 **you know a Darrell Edwards?**

20 A. No.

21 Q. **Okay. Prior to March 2, 2003, had you**
22 **ever had any interactions with any police**
23 **officers that were on Ron Watts's team?**

24 A. Yeah.

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1 **Q. Who -- who did you have contact with?**

2 A. You'd see them all the time.

3 **Q. Okay. And did you -- did you talk to**
4 **them?**

5 A. Yeah.

6 **Q. Yeah. Did you have a -- I guess, did**
7 **you have friendly interactions with the members**
8 **of Watts's team?**

9 A. Some.

10 **Q. Okay. And who were -- who do you**
11 **remember being on Watts's team that you had**
12 **interactions with prior to March 2nd, 2003?**

13 A. Smitty, Al. It was -- I -- I --
14 it's -- I -- I really can't think of their name.
15 It was a lady.

16 **Q. What -- can you describe the lady?**

17 A. She was, ah, short.

18 **Q. Was she white, black?**

19 A. She's black.

20 **Q. Did she have a nickname?**

21 A. I think it was Regina, something -- I
22 don't -- I don't know. I can't recall.

23 **Q. All right. Did you ever have any**
24 **negative interactions with the officer you**

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1 **identified as Smitty?**

2 A. No.

3 **Q. Did you ever have any negative**
4 **interactions with the officer you knew as Al?**

5 A. No.

6 **Q. Did you ever have any negative**
7 **interactions with the officer you knew as -- or**
8 **strike that.**

9 **Did you ever have any -- strike that.**

10 **Did you ever have any negative**
11 **interactions with the African American female**
12 **officer?**

13 A. No.

14 **Q. Did you ever have any negative**
15 **interactions with any police officers that**
16 **worked on Ron Watts's team?**

17 A. Not that I can recall.

18 **Q. Okay. All right. So the door gets**
19 **kicked in.**

20 **What's the next thing that happened**
21 **then?**

22 A. The polices, they come in there, and
23 they start beating on me and my kids. They
24 searching the house. And one of them go in the

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1 bathroom, and he come back out with a -- with
2 a -- a bundle, a bag or something. I don't -- I
3 don't know. And he said, "This is yours. Now,
4 who is going to claim it?"

5 **Q. Did you ever see any police officer**
6 **bring a bundle into your apartment?**

7 A. Pardon me?

8 **Q. Did -- on that day, did you see any**
9 **police officer bring a bundle into your**
10 **apartment?**

11 A. No.

12 **Q. So you first saw a police officer**
13 **taking a bundle out of your bathroom; is that**
14 **right?**

15 A. Yes.

16 **Q. And was it a bundle of heroin?**

17 A. I don't know what it was. Like,
18 when -- when I went to court, it was heroin.

19 **Q. Okay. You later learned that it was**
20 **heroin, right?**

21 A. Mm-hmm, yes. Yes.

22 **Q. Okay. So let's describe the officers**
23 **that entered into your apartment that day.**

24 A. Ah, it was their -- just the regular

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1 team: Al, ah, the lady, Smitty, and Watts.

2 Watts was the last one that walked in there.

3 Q. Okay. Did you ever hear of a -- of a
4 female who was on Watts's team, her nickname was
5 Coco?

6 A. Ah, yeah. That's her name, yeah, Coco.

7 Q. Okay. So you -- is that -- when I --
8 when I just said that -- that name, Coco, now
9 you know that was the -- the female officer that
10 entered --

11 A. Yeah.

12 Q. -- that entered your apartment?

13 THE COURT REPORTER: Sorry?

14 THE WITNESS: Oh, okay. I was --

15 BY MR. BAZAREK:

16 Q. Yeah. We are talking over --

17 A. I apologize.

18 Q. So, Mr. Young, it's your testimony that
19 you now know now the -- the name of the female
20 African American officer, her nickname was Coco;
21 is that right?

22 A. Yes.

23 Q. Okay. And it's your testimony that,
24 you know, Officer Coco, she was the female that

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1 **entered your apartment on March 2nd, 2003,**
2 **correct?**

3 A. If I can recall, yeah.

4 Q. **Yeah. And is it your testimony that --**
5 **Officer Smitty, he was one of the officers that**
6 **entered your apartment on March 2nd, 2003?**

7 A. Well, actually it was -- it was a -- it
8 was a lot of them in there. It -- I can't, you
9 know...

10 Q. **Did -- did -- did Smitty enter your**
11 **apartment on March 2nd, 2003?**

12 A. I believe so.

13 Q. **Okay. Did Coco enter your apartment on**
14 **March 2nd, 2003?**

15 A. I believe so.

16 Q. **Okay. And you said Al?**

17 A. Yeah.

18 Q. **Officer Al entered your apartment on**
19 **March 2nd, 2003?**

20 A. I believe so.

21 Q. **Okay. And then you said Watts also**
22 **entered your apartment on March 2nd, 2003,**
23 **correct?**

24 A. Yes.

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1 **Q. I just want to make sure I understand**
2 **how many officers total entered your apartment.**
3 **Okay?**

4 **A. Mm-hmm. Like I said, it was -- it was**
5 **quite a few.**

6 **Q. Okay. Who -- who else entered your**
7 **apartment, if you know?**

8 **A. I -- I can't recall. It's --**

9 **Q. How many total members of the Chicago**
10 **Police Department entered your apartment on**
11 **March 2nd, 2003?**

12 **A. Maybe four or five. I -- I can't**
13 **recall.**

14 **Q. Is your -- is your best memory that it**
15 **was four or five officers that entered?**

16 **A. No.**

17 **Q. Well, what is your best memory of how**
18 **many officers entered?**

19 **A. I can't -- I can't recall.**

20 **Q. Was it less than -- was it less than**
21 **five?**

22 **A. I -- I don't know. I'm not going to**
23 **sit here and tell you yeah, and I'm not going to**
24 **say no.**

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1 **Q. Was it more than five?**

2 A. Maybe.

3 MS. GIZZI: Objection, form.

4 BY MR. BAZAREK:

5 **Q. Was it more than five officers that**
6 **entered your apartment?**

7 A. I don't know, sir.

8 **Q. Was it more than ten?**

9 MS. GIZZI: Objection, form.

10 BY THE WITNESS:

11 A. I don't know. I don't know.

12 BY MR. BAZAREK:

13 **Q. Was it more than 20?**

14 A. I don't know.

15 **Q. So it's your testimony that after**
16 **police -- and you don't know -- even know how**
17 **many came into your apartment, right?**

18 **Is that your testimony?**

19 A. Yes.

20 **Q. Okay. That you -- that you and your**
21 **kids were hit?**

22 A. Yes.

23 **Q. The -- were the girls hit too?**

24 A. No. I don't think so. He just had the

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1 boys, all of the boys.

2 Q. Okay. And it's your testimony that you
3 were hit, right?

4 A. Yes.

5 Q. Who hit you?

6 A. Watts.

7 Q. How many times did Watts hit you?

8 A. I can't recall.

9 Q. Was it more than once?

10 A. Probably so.

11 Q. Where did Watts hit you?

12 A. He slapped me. He punched my son.

13 Then after -- after he came out the bathroom, he
14 was like, "This is yours. You going to claim
15 this, or I'm putting it on everybody."

16 Q. Other -- other than Ron Watts, did any
17 police officer hit you or -- or your sons?

18 A. Al, I believe.

19 Q. Who did Al hit?

20 A. My son.

21 Q. Which son did Al hit?

22 A. Corey.

23 Q. Where did Al hit Corey?

24 A. I couldn't tell you.

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1 **Q. How old was Corey?**

2 A. I was in the back -- I was in the back
3 by then. Watts -- Watts had took me in the
4 back.

5 **Q. All right. All right. So then it's**
6 **your testimony that at no time did you see**
7 **Jones -- or strike that.**

8 **It's your testimony that you never saw**
9 **Corey get hit?**

10 A. Yeah. I heard him hollering.

11 **Q. Okay. So you -- you heard Corey**
12 **hollering?**

13 A. Yeah.

14 **Q. Right?**

15 A. Yeah.

16 **Q. But did you ever actually see Corey get**
17 **hit by Officer Al?**

18 A. No.

19 **Q. Did you ever see any of your children**
20 **hit by Officer Al?**

21 A. No. I just heard them hollering.

22 **Q. Okay. Other than Corey hollering, did**
23 **you hear any of your other kids hollering?**

24 A. Yeah. They -- well, they was

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1 screaming. It was a lot -- it's a lot of -- it
2 was a lot of confusion going on.

3 **Q. Did any of your children ever tell you**
4 **at any time that they were hit by Officer A1?**

5 A. Yes.

6 Q. Who?

7 A. Corey.

8 Q. Anyone else?

9 A. And Greg.

10 Q. Did you see Greg get hit that day?

11 A. No.

12 Q. What did -- what did your son Greg tell
13 you about being hit by Officer A1?

14 A. He said, "Daddy, he is going to put
15 this on us."

16 Q. What did he say about getting hit by
17 Officer A1?

18 A. Pardon me?

19 Q. Did he --

20 A. He said he slapped him.

21 Q. Okay. That's what Greg -- your son
22 Greg told you?

23 A. Yeah.

24 Q. Okay. Did he -- did he say he slapped

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1 **him once or more than once?**

2 A. He didn't say.

3 **Q. Okay. How old was Greg at the time?**

4 A. Greg was, like, maybe ten, nine.

5 **Q. And then did Corey say anything about**
6 **getting slapped by Al?**

7 A. Um, I can't recall.

8 **Q. And I know you've talked about Watts.**

9 **And you've talked about Al.**

10 **Did any of your -- did any of your kids**
11 **say that they -- strike that.**

12 **Did any of your -- did any of your**
13 **other kids say that they were hit by any police**
14 **officer that day?**

15 A. No. Just the two.

16 **Q. Okay. And I'm sorry if I -- I don't**
17 **know if I asked you this: How old was Corey at**
18 **the time in 2003?**

19 A. I believe maybe 16, 15, give or take.

20 **Q. Yeah. Where does your son Gregory live**
21 **these days?**

22 A. He stays on Crandall.

23 **Q. He lives in Chicago?**

24 A. Yes.

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1 Q. **When was it when Gregory -- strike**
2 **that.**

3 **Yeah. When was it when Gregory spoke**
4 **to you about being slapped by Al?**

5 A. Pardon me?

6 Q. **When was it -- is Greg -- when was it**
7 **that Gregory spoke to you about being slapped by**
8 **Al?**

9 A. As I was coming out.

10 Q. **Okay.**

11 A. With Watts, handcuffs.

12 Q. **But Gregory was taken to the police**
13 **station with you, right?**

14 A. No.

15 Q. **Okay. Were --**

16 A. Just --

17 Q. **Go ahead.**

18 A. Just me.

19 Q. **At any time were any of your sons with**
20 **you in the police station that day?**

21 A. No.

22 Q. **Whose bundle was it that was in the**
23 **bathroom at Apartment 102?**

24 A. I wouldn't know.

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1 **Q. So it could have belonged to one of**
2 **your kids?**

3 A. No.

4 **Q. Well, how do you know that?**

5 A. Because I know.

6 **Q. Right. What's the source --**

7 A. No. I never let my kids interact with
8 no -- with the older guys out there.

9 **Q. Say that again.**

10 A. I'm never letting my kids interact with
11 the older guys out there.

12 **Q. What does that mean?**

13 A. You know, as far as being -- playing
14 with them. People always play with their kids.

15 **Q. Has Gregory ever had any -- has he been**
16 **arrested before?**

17 A. Yeah.

18 **Q. What's -- what has Gregory been**
19 **arrested for?**

20 A. I couldn't -- driving, a suspended
21 license.

22 **Q. Anything else?**

23 A. That's -- that's about it that I know
24 of.

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1 **Q. Have you ever been in a police station**
2 **with Gregory?**

3 A. Me? No.

4 **Q. Yeah.**

5 A. Not that I can recall.

6 **Q. Okay. How much time total were the**
7 **police inside Apartment 102?**

8 A. I can't recall.

9 **Q. How much time elapsed from the time the**
10 **police kicked in the door until you were taken**
11 **out of the apartment?**

12 A. I can't recall.

13 **Q. Other than going in the -- into the**
14 **bathroom --**

15 A. Mm-hmm.

16 **Q. -- did you -- were -- strike that.**

17 **Who -- who actually came out of the**
18 **bathroom with the heroin?**

19 A. I can't recall.

20 **Q. I mean, did you -- was --**

21 A. I know Watts had it in his hand. He
22 said, "This is the" --

23 **Q. Okay. So when you say Watts had it in**
24 **his hand, where -- where is it that you see it's**

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1 **in Watts's hand?**

2 A. In his hand.

3 **Q. Okay. So did Watts come out of the**
4 **bathroom with the heroin in his hand?**

5 A. Yes.

6 **Q. Okay. So the only one that you saw**
7 **with the heroin in his hand was Watts; is that**
8 **correct?**

9 A. Mm-hmm, yes.

10 **Q. Is that right?**

11 A. As I can recall, yes.

12 **Q. Okay. And when Watts was coming out of**
13 **the bathroom with the heroin in his hand, what**
14 **are the other police officers doing?**

15 A. Searching, I guess. I don't know. I
16 can't recall.

17 **Q. Yeah. Where were they searching?**

18 A. The whole house.

19 **Q. Yeah. Did they go into a bedroom?**

20 A. Maybe. I don't know.

21 **Q. Yeah. How many bedrooms were in the**
22 **house?**

23 A. The whole house.

24 **Q. How many bedrooms were in the house?**

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1 A. I believe it was three or four.

2 Q. Okay. And then the -- in the bed --
3 did you stay in one of the bedrooms, you and
4 Penny?

5 A. Yes.

6 Q. And you had a bed in there, right?

7 A. Yes.

8 Q. With a mattress?

9 A. Yes.

10 Q. Right. And would you -- would you put
11 things sometimes underneath the mattress in your
12 bedroom?

13 A. No.

14 Q. For safekeeping?

15 A. No.

16 Q. No?

17 A. No.

18 Q. Where would you -- where would you keep
19 things for safekeeping in your apartment?

20 A. I wouldn't.

21 Q. Did you -- well, when you would buy
22 heroin, did you bring it into your apartment,
23 102?

24 A. No.

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1 Q. **Why not?**

2 A. Because I don't bring it around my
3 kids.

4 Q. **Okay. So it's your testimony that at**
5 **no time did you ever bring illegal narcotics**
6 **into Apartment 102.**

7 A. None.

8 Q. **What if you -- say you bought three**
9 **bags in one -- in -- say you had three bags on**
10 **any given day, right?**

11 A. Mm-hmm.

12 Q. **And what was your routine? Would you**
13 **take, you know, one bag and then wait a few**
14 **hours and then take another bag and then wait a**
15 **few hours and take another bag? How would**
16 **you -- how would you do it?**

17 A. I would snort them all before I go in
18 the house.

19 Q. **Okay. So you wouldn't -- you wouldn't**
20 **keep some in reserve, so to speak?**

21 A. No.

22 Q. **Well, what if you -- well, tell -- what**
23 **if you bought two days' worth of heroin, say six**
24 **bags, right?**

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1 **What would you do with -- if -- would**
2 **you -- would you use all six bags in one day?**

3 A. I wouldn't buy six.

4 Q. **Okay. So the most heroin you would**
5 **ever buy in one day would be three bags?**

6 A. Yeah, maybe two.

7 Q. **Even if you had a -- extra money to buy**
8 **extra bags?**

9 A. Yeah. I wouldn't -- I wouldn't buy.

10 Q. **And why is that?**

11 A. Because I wouldn't bring it in the
12 house.

13 Q. **Okay. And so I want to make sure I**
14 **understand your testimony.**

15 **If you had enough money to buy three**
16 **bags, you would buy three bags, right?**

17 A. No.

18 Q. **Well, how would you decide if you want**
19 **to buy one bag a day or two bags a day or three**
20 **bags a day?**

21 A. Well, it -- it all depends on how much
22 money I got.

23 Q. **Yeah.**

24 A. And I -- and I didn't do nothing but,

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1 like, a bag or two a day.

2 Q. Okay. And so going back to when you
3 would use, like, say, one or two bags a day, you
4 would always do both bags at the same time
5 pretty much?

6 A. Yeah.

7 Q. It's not like you'd take one bag and
8 then wait a few hours.

9 You -- that's not the way you did it?

10 A. No.

11 Q. Okay. As soon as you got the heroin
12 you were going to use that day, you snorted it,
13 right?

14 A. Yes.

15 Q. Would you --

16 A. I wouldn't --

17 Q. Go ahead.

18 A. I was going to say, I wouldn't bring it
19 around my kids, period.

20 Q. Yeah.

21 Would you agree that most of the time
22 in your adult life when you have possessed
23 heroin that you have not been arrested by the
24 police?

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1 A. Yeah. I've been arrested.

2 Q. No.

3 **What I'm saying is, the vast majority**
4 **of the time -- when you've possessed heroin,**
5 **right, and then you snort it, would you agree**
6 **that the vast majority of times you were never**
7 **arrested with the heroin?**

8 A. I don't --

9 MS. GIZZI: Objection, form.

10 Go ahead.

11 BY THE WITNESS:

12 A. I don't -- I don't understand what
13 you're saying.

14 BY MR. BAZAREK:

15 Q. All right. You've been using heroin
16 for your entire adult life, true?

17 A. Yeah.

18 Q. Right?

19 A. Yeah.

20 Q. So think about every day that you've
21 obtained heroin.

22 You were able to use that heroin
23 without being apprehended by the police, right?

24 A. Yes.

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1 Q. **That's all I'm getting at.**

2 A. Yeah.

3 Q. **Most of the time, right?**

4 A. Yeah.

5 Q. **There have been -- there have been**
6 **occasions where you've been arrested where you**
7 **did possess heroin, right?**

8 A. I don't -- no. I don't understand what
9 you're saying.

10 Q. **There -- there have been occasions**
11 **where you have been arrested by the police when**
12 **you possessed heroin, right?**

13 A. Yeah.

14 Q. **Yeah. How many times -- how many times**
15 **do you think it's been that you've been arrested**
16 **by the police when you had heroin?**

17 A. Maybe once.

18 Q. **Okay. Do you remember --**

19 A. I --

20 Q. **Do you remember when that one or -- one**
21 **or two times was?**

22 A. No.

23 Q. **Okay. Okay. I want to go -- so you**
24 **see Watts come out of the bathroom.**

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1 **He's got the heroin, right?**

2 A. Mm-hmm.

3 **Q. Right?**

4 A. Yes.

5 **Q. Okay. Well, you know, your face is --**

6 **I can only see half your face right now.**

7 A. Oh. Okay.

8 **Q. There you go. Okay.**

9 **And then at some point are you put in
10 handcuffs?**

11 A. Yes.

12 **Q. Who handcuffed you?**

13 A. Watts.

14 **Q. Did anyone else handcuff you other than
15 Watts?**

16 A. No.

17 **Q. What happened after you were
18 handcuffed?**

19 A. He -- he showed me. He say, "If you
20 don't take this -- if you -- if this -- if
21 this -- if you don't take this, then I'm going
22 to put it on everybody in the house." So I told
23 him it was mine.

24 **Q. Okay. And so -- and that conversation**

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1 **occurred inside Apartment 102?**

2 A. Yes.

3 Q. **And then after you said, "It was**
4 **mine" -- meaning, it was your heroin, right?**

5 A. Yes.

6 Q. **And were the other police officers**
7 **around when you said, "This is my heroin"?**

8 A. Yes.

9 Q. **Okay. And what happened next?**

10 A. He locked me up.

11 Q. **Who locked you up?**

12 A. Watts. He told them take me to the
13 car.

14 Q. **Okay. So Watts -- he handcuffed you,**
15 **and Watts arrested you, correct?**

16 A. Yes.

17 Q. **And he did it by himself, right?**

18 A. Yes.

19 Q. **And then who took you -- who took you**
20 **out of Apartment 102?**

21 A. Ah, I think it was Al.

22 Q. **Did --**

23 A. If I'm not mistaken.

24 Q. **Did Al --**

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1 THE COURT REPORTER: Sorry. Could you repeat
2 that?

3 BY MR. BAZAREK:

4 **Q. Did --**

5 A. I think it was Al, if I can recall.

6 **Q. Okay. At any time that day did -- did**
7 **Al say anything to you?**

8 A. I can't recall.

9 **Q. As you sit here at this deposition, do**
10 **you recall anything that Al said?**

11 A. I think it was -- I don't -- I can't --
12 I can't recall.

13 **Q. Would anything help you recall?**

14 A. Maybe.

15 **Q. Other than Watts, did you ever hear any**
16 **other -- any police officer that day say**
17 **anything inside Apartment 102?**

18 A. No. I can't recall.

19 **Q. Would anything help you recall?**

20 A. Maybe.

21 **Q. Okay. But as you sit at this**
22 **deposition, you have no recollection of any**
23 **police officer saying anything other than Watts,**
24 **correct?**

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1 A. I -- I can't recall.

2 Q. Right. But at this deposition, you
3 have no recollection of any officer other than
4 Watts saying anything, correct?

5 A. I -- correct.

6 Q. Okay. So you believe Al takes you out
7 of the apartment in handcuffs, right?

8 A. Mm-hmm.

9 Q. Is that right?

10 A. That -- that's to my knowledge, yeah.

11 Q. And then what happened?

12 A. Watts came out, and then I was at the
13 police station.

14 Q. Do you remember what police station you
15 were taken to?

16 A. Ah, no.

17 Q. Were any of your family members at the
18 police station?

19 A. Ah, I think my wife came up there.

20 MS. GIZZI: Bill, let us know when a good
21 time to break for lunch would be.

22 MR. BAZAREK: Yeah, we can do it -- we can do
23 it fairly soon, because I think we're -- let's
24 go a little bit more, and then we can -- we can

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1 break.

2 MS. GIZZI: Okay.

3 BY MR. BAZAREK:

4 Q. And I'm sorry. I'm sorry. Going back
5 to -- were you taken to a substation, like a
6 police station near Ida B. Wells, or were you
7 taken to the 2nd District? Do you remember?

8 A. No. I think it was -- I think they had
9 police stations in the, ah, projects.

10 Q. Yeah.

11 A. Yeah.

12 Q. Do you remember where that was, that
13 police station?

14 A. Um, no.

15 Q. Okay. And don't -- as you were being
16 taken to the police station, was anything being
17 said to you on the way to the station?

18 A. No, not that I can recall.

19 Q. Were you saying anything to the police?

20 A. I mean, "Why you doing this to me?"

21 Q. Who did you say that to?

22 A. I think it was Al.

23 Q. When were you saying it to --

24 A. I -- pardon me?

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1 **Q. Go ahead. Sorry. Go ahead.**

2 A. Oh, I can't recall who -- who I was
3 with, who -- what car I got in or nothing. I --

4 **Q. Yeah. Well, you were still under the
5 influence of heroin, right?**

6 A. Pardon me?

7 **Q. You were still under the influence of
8 heroin at that time, right?**

9 A. Yeah.

10 **Q. Yeah. Do you think maybe that's why
11 you can't remember things that clearly as to who
12 said what?**

13 A. No. Maybe. I don't know.

14 **Q. Okay. All right. So you said words to
15 the effect of "Why are you doing this to me?"**

16 **And you believe you said that in the
17 car, in the police car, on the way to the police
18 station?**

19 A. I believe so.

20 **Q. Was anything said in response to you
21 saying that?**

22 A. I can't recall.

23 **Q. Okay. Would anything help you recall?**

24 A. Maybe.

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1 **Q. When you went to the police station,**
2 **tell me everything that happened.**

3 A. I -- I can't recall.

4 **Q. Can you tell me anything that happened**
5 **inside the police station after you were**
6 **arrested?**

7 A. No.

8 **Q. Did anything bad happen to you inside**
9 **the police station after you were arrested?**

10 A. No.

11 **Q. Ultimately, were you taken to the**
12 **2nd District to go into lockup; do you remember?**

13 A. I can't recall.

14 **Q. Okay. Have you ever been in a -- in a**
15 **police lockup before?**

16 A. Sure.

17 **Q. And they screen -- you know, they --**
18 **don't they screen you, the lockup keepers?**

19 A. Sure.

20 **Q. They ask you questions, that type of**
21 **thing, right?**

22 A. Mm-hmm.

23 **Q. Is that right?**

24 A. Yes, sir.

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1 Q. **On that day, did you ever tell the**
2 **lockup keepers that you were hit by Sergeant**
3 **Watts?**

4 A. No.

5 Q. **Where -- where on your body did**
6 **Sergeant Watts hit you?**

7 A. I can't recall. It's been --

8 Q. **Okay.**

9 A. Punched me in my stomach or I don't
10 know.

11 Q. **Okay. Other than Watts, did any other**
12 **police officer hit you that day?**

13 A. Maybe Al. I -- I can't recall, sir.

14 Q. **Well, as you -- as you sit -- as you**
15 **sit here today, other than Watts do you recall**
16 **any other police officer hitting you?**

17 A. Maybe Al. I -- I can't recall.

18 Q. **So are you -- you're just guessing**
19 **that that hap- --**

20 A. No. I'm not guessing.

21 Q. **Well, you're saying maybe.**

22 A. I said -- no. I'm saying Al maybe,
23 right. I can't recall.

24 Q. **Right. So then you're -- are you**

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1 saying that -- here.

2 Did -- is it your testimony that you
3 were hit by any other police officer other than
4 **Watts?**

5 A. I can't recall.

6 Q. Okay. So as -- you would agree as
7 you -- as you sit here at this deposition, the
8 only Chicago Police Department member that you
9 recall hitting you was Watts, correct?

10 A. Yes.

11 MR. BAZAREK: Okay. We can -- I think we can
12 take a break for lunch. And let's just go off
13 the record, and we -- then we'll decide how --
14 how much time we need.

15 THE VIDEOGRAPHER: We're going off the record
16 at 12:43 p.m.

17 (Whereupon, a lunch break was
18 taken.)

19 THE VIDEOGRAPHER: This is the beginning of
20 Media Unit 2, and we are back on the record at
21 1:31 p.m.

22 BY MR. BAZAREK:

23 Q. Following that March 2, 2003 arrest,
24 Mr. Young, you pled guilty the following month

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1 **to the narcotics crime, correct?**

2 A. Yes.

3 **Q. And that was on April 21, 2003, right?**

4 A. Yes.

5 **Q. And you were before Judge**
6 **John J. Flemming, right?**

7 A. Yes.

8 **Q. And when you pled guilty, you were**
9 **being truthful, right?**

10 A. No.

11 **Q. You -- you lied to the judge?**

12 A. Yes.

13 **Q. Why did -- why would you lie to a**
14 **judge?**

15 A. Because I didn't -- I couldn't afford
16 no lawyer.

17 **Q. Is there any other reason why you lied**
18 **to the judge other than you couldn't afford a --**
19 **another lawyer?**

20 A. No.

21 **Q. So can you explain that to me?**

22 A. Ah, all my life all I did was applied
23 to -- "Yeah, I did it." I never fought for
24 anything. I don't have the money. I don't have

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1 money for lawyers, none of that. So what do you
2 do? You just take the punches as they come.

3 MR. BAZAREK: Well, let's -- we are going to
4 mark this Deposition Exhibit No. 1. It's
5 PL JOINT 043955 to 966. And if we can put that
6 up on the screen. Okay.

7 (Whereupon, Young Deposition
8 Exhibit No. 1 was marked for
9 identification.)

10 BY MR. BAZAREK:

11 Q. All right. Mr. Young, this is a
12 transcript of the court proceeding on the date
13 that you pled guilty.

14 Do you see that?

15 A. Mm-hmm.

16 Q. Is that a --

17 A. Not really.

18 Q. Is that yes? Do you see it?

19 A. Yes.

20 Q. Okay. And you see on -- on that first
21 page it -- it identifies, if we can just scroll
22 up a little bit, the attorney that was
23 representing you was a Pamela -- and I will
24 spell the last name -- P-F-R-A-N-G.

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1 **Do you see that?**

2 A. Ah-huh.

3 **Q. And you were represented by counsel on**
4 **that day, right?**

5 A. Ah-huh.

6 **Q. Is that yes?**

7 A. Yes.

8 **Q. And that's the day you pled guilty,**
9 **right?**

10 A. Yes.

11 **Q. So, I guess, I don't understand. You**
12 **were represented by counsel, but you're saying**
13 **you pled guilty because you didn't have a**
14 **private attorney?**

15 A. Yes.

16 **Q. All right. Can you look at the camera**
17 **and tell me why?**

18 A. Did you say why?

19 **Q. Yeah. Why?**

20 A. Ah, because I had told her that it
21 wasn't mine. So she said --

22 **Q. What did you --**

23 A. She said there was nothing that -- you
24 know what I'm saying? Nothing she can do.

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1 Q. **What did -- did you -- strike that.**

2 **When did you tell Pamela, your**
3 **attorney, that "it wasn't mine"?**

4 A. The same day represent- -- she
5 represented me.

6 Q. **Okay. Was that the first time you ever**
7 **told an attorney that the narcotics were --**
8 **weren't yours?**

9 A. Yes.

10 Q. **And that was on the day you pled**
11 **guilty?**

12 A. Yes.

13 Q. **All right. Tell me everything said**
14 **between you and your attorney on that day.**

15 A. I can't recall. I can't recall.

16 Q. **Well -- well, tell me anything you said**
17 **to her.**

18 A. I can't -- I told her it wasn't mine.

19 Q. **And then what did she say to you?**

20 A. She -- she just said -- she -- "They
21 going to convict you on your background."

22 Q. **And then what did you say to that?**

23 A. Hmm, I just -- "Where do I sign at?"

24 Q. **Okay. So -- but so you knowingly**

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1 **agreed to plead guilty because you had a -- an**
2 **extensive background, right?**

3 A. Yes.

4 Q. **And when I say --**

5 A. I -- okay. Go ahead.

6 Q. **Go ahead. No. What were you going to**
7 **say?**

8 A. No. Go ahead.

9 Q. **You -- you knowingly pled guilty**
10 **because you knew with your criminal history or**
11 **background that you would face a -- a lengthier**
12 **sentence, correct?**

13 A. Yeah.

14 Q. **And that's why you also knowingly pled**
15 **guilty, right?**

16 A. Yeah.

17 Q. **No one forced you to plead guilty,**
18 **right?**

19 A. No.

20 Q. **You voluntarily pled guilty, right?**

21 A. Yes.

22 Q. **And I -- I didn't ask you this, sir:**
23 **What's the highest level of education you**
24 **received?**

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1 A. 9th grade.

2 Q. And you know how -- you know how to
3 read, right?

4 A. No.

5 Q. You -- you do know how to read, or you
6 don't know how to read?

7 A. I don't.

8 Q. So when you signed verifications to
9 your interrogatory answers in this case under
10 penalty of perjury, is it your testimony that
11 you were unable to read your answers?

12 A. Yes.

13 Q. Well, why would you sign answers under
14 penalty of perjury if you don't know what the
15 words say?

16 MS. GIZZI: Objection. Misstates the
17 testimony.

18 BY THE WITNESS:

19 A. Because that's what I have been doing
20 all my life.

21 BY MR. BAZAREK:

22 Q. Okay. So right now we're looking at
23 the transcript from the court proceeding on the
24 day that you pled guilty on April 21st, 2003,

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1 **right?**

2 A. Mm-hmm.

3 **Q. Is that right?**

4 A. Yes.

5 **Q. Do you see the -- do you see the**
6 **caption of the -- of the transcript?**

7 **Can you read that?**

8 A. Which one?

9 **Q. Look at the very top. Look at the very**
10 **top line of the transcript.**

11 **What does it say?**

12 A. Looking up here?

13 MS. GIZZI: Yeah.

14 BY THE WITNESS:

15 A. State of Illinois.

16 BY MR. BAZAREK:

17 **Q. Okay. And underneath that, what does**
18 **it say?**

19 A. I can't really see it.

20 **Q. Does it say County of Cook?**

21 A. Yes.

22 **Q. Okay. And then under -- under County**
23 **of Cook it says, "In the Circuit Court of Cook**
24 **County, Illinois."**

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1 **Do you see that?**

2 A. Yes.

3 **Q. Are you able to read that?**

4 A. Not really.

5 **Q. Okay. Do you -- or do you see the**
6 **words on the first page? It says, "The People**
7 **of the State of Illinois."**

8 **Do you see that?**

9 A. Yeah.

10 **Q. Can you read that?**

11 A. No. The only thing I can read is
12 Gregory Young.

13 **Q. Okay. You can read your name?**

14 A. Yes.

15 **Q. So when you say you -- are -- is it**
16 **because you're -- you can't read -- read certain**
17 **words on the page, or it's just you -- you need**
18 **glasses? Like, I'm trying to figure out --**

19 A. No. I can't -- I can't read, period,
20 them -- the words.

21 **Q. Okay. So let's look at -- I'll get the**
22 **page in a minute.**

23 **Let's take a look at page 6. And**
24 **that's PL JOINT 043960. And you see -- well, I**

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1 will just read it to you.

2 The Court asked you beginning on line
3 2, "Do you still want to plead guilty?"

4 And then you say, "Yes, sir."

5 Do you see that?

6 A. Yes.

7 Q. And then the Court said, "Other than
8 the agreement stated here in open court for four
9 years in the Illinois Department of Corrections,
10 anything else promised to you to get you to
11 plead guilty? Has anything else been promised
12 you, money or anything like that, to get you to
13 plead guilty?"

14 And then you answered, "No, sir."

15 Do you see that?

16 A. Yes.

17 Q. And then the Court said, "No one
18 forced, threatened or coerced you to plead
19 guilty. You are pleading guilty of your own
20 free will?"

21 And then you answered the Court. You
22 said, "Yes, sir."

23 Do you see that?

24 A. Yes.

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1 Q. **And that was true, right?**

2 A. No.

3 Q. **Well, no one was forcing you to plead**
4 **guilty, right?**

5 A. No.

6 Q. **That's a true statement, right?**

7 A. No.

8 Q. **Okay. Did anyone force you to plead**
9 **guilty, sir?**

10 A. I forced myself to plead guilty.

11 Q. **Why did you force yourself to plead**
12 **guilty?**

13 A. So I can come home to my kids.

14 Q. **Okay. And so you were concerned that**
15 **you could have a lengthier sentence; is that**
16 **your testimony?**

17 A. Yes.

18 Q. **So you got a deal, right?**

19 A. No.

20 Q. **Didn't you work out a -- didn't your --**
21 **didn't your -- you and your attorney and the**
22 **State's Attorney work out a deal?**

23 A. If that's what you say.

24 Q. **Well, what would you say it was?**

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1 A. I would say I came home early.

2 Q. **Have you ever lied to a judge when you**
3 **were in the courtroom?**

4 MS. GIZZI: Objection, form.

5 BY THE WITNESS:

6 A. Pardon me?

7 BY MR. BAZAREK:

8 Q. **Have you ever lied to a judge when you**
9 **were in a courtroom?**

10 A. Sure.

11 Q. **Why would you lie to a judge?**

12 A. So I could get home.

13 Q. **Have you lied to more than one judge in**
14 **your life?**

15 A. No.

16 Q. **How many times have you lied to a**
17 **judge?**

18 A. Once.

19 Q. **When did you lie to a judge?**

20 A. When I got the four years.

21 Q. **Did you tell the judge that you were**
22 **lying?**

23 A. No.

24 Q. **Why not?**

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1 A. I didn't -- I don't know.

2 Q. You -- you kept it to yourself?

3 A. Yeah.

4 Q. Okay. We can take that down.

5 So even though you were sentenced to
6 four years, you didn't actually serve four
7 years, correct?

8 A. No.

9 Q. How -- how long -- how much time did
10 you serve, if you know?

11 A. Two years.

12 Q. And was the two years including the
13 time you had in -- in Cook County Jail?

14 A. I didn't have no time in Cook County
15 Jail.

16 Q. Okay. Oh, you -- so you were out on
17 bond when you --

18 A. No.

19 Q. All right. How much time were you in
20 Illinois Department of Corrections following
21 that conviction?

22 A. A month, and then I went down to the
23 penitentiary.

24 Q. Okay. And where were you for the

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1 **month?**

2 A. In the county jail.

3 Q. **Okay. Did anything bad happen to you**
4 **when you were in Cook County Jail?**

5 A. I fought. I fought.

6 Q. **What happened?**

7 A. A fight. Fought. You know when --

8 Q. **You got --**

9 A. -- you fight?

10 Q. **You got in a fight in Cook County Jail?**

11 A. Yeah.

12 Q. **Who'd you get in a fight with?**

13 A. Several people.

14 Q. **What were you fighting about?**

15 A. I can't recall.

16 Q. **Were they gang members you were**
17 **fighting?**

18 A. Yes.

19 Q. **Well, you were -- you were a Black P**
20 **Stone at the time, right?**

21 A. Yes.

22 Q. **Were they in a different gang?**

23 A. No.

24 Q. **Were you fighting your fellow Black P**

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1 **Stones?**

2 A. Yes.

3 **Q. And what were -- what were you guys**
4 **fighting about?**

5 A. Several things.

6 **Q. What?**

7 A. I can't recall.

8 **Q. Were you fight -- fighting about**
9 **narcotics?**

10 A. No.

11 **Q. Who -- who were the people -- who were**
12 **the Black P Stones you were fighting with?**

13 A. I can't recall.

14 **Q. Did you get hurt?**

15 A. I can't recall.

16 **Q. Did you -- did you have any injuries**
17 **during the time when you were in Cook County**
18 **Jail?**

19 A. I can't recall.

20 **Q. Would anything help you recall?**

21 A. No.

22 **Q. Did you -- did you get any medical**
23 **treatment when you were in Cook County Jail for**
24 **that month?**

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1 A. No.

2 Q. Did you get denied having any medical
3 treatment while you were in Cook County Jail for
4 that month?

5 A. Yeah.

6 Q. Tell me about that.

7 A. Ah, I would rather not talk about it.

8 Q. Well, what -- what were you seeking
9 medical treatment for?

10 A. I can't recall.

11 Q. Well, was it for a toothache? Was it
12 for bursitis? What was it for?

13 A. I can't recall.

14 Q. Did it have anything to do with a fight
15 you were in with the -- your fellow Black P
16 Stones?

17 (E-mail received sound over
18 Zoom.)

19 BY MR. BAZAREK:

20 Q. Did you -- did you --

21 THE COURT REPORTER: Sorry. Sorry. I didn't
22 get the answer.

23 BY THE WITNESS:

24 A. I can't recall.

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1 BY MR. BAZAREK:

2 Q. Did you beat up any of those Black P
3 Stones while you were in Cook County Jail?

4 A. Plead the Fifth.

5 Q. Did you commit any violent acts against
6 those Black P Stones while you were in Cook
7 County Jail?

8 A. Plead the Fifth.

9 Q. And throughout this deposition, sir,
10 when you've been pleading the Fifth, the reason
11 you're pleading the Fifth is because if
12 you've -- gave truthful testimony, it would
13 incriminate you, correct?

14 A. No.

15 Q. So then why are you pleading the Fifth
16 if it's not going to incriminate you?

17 A. Because I'd rather not talk about it.

18 Q. Have you ever shot anyone?

19 A. No.

20 Q. Have you ever physically injured
21 anyone?

22 A. No.

23 Q. What -- what else that was bad happened
24 to you while you were in Cook County Jail?

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1 A. Everything.

2 Q. **What?**

3 A. Number one, I didn't have to be there.

4 I shouldn't have been there.

5 Q. **Anything else?**

6 A. That's it.

7 Q. **Well, sir, if you -- you pled guilty in**
8 **April of 2003, why didn't you ask for a trial?**

9 A. I didn't know nothing about it.

10 THE COURT REPORTER: Could you repeat that?

11 BY THE WITNESS:

12 A. I didn't know nothing about it.

13 BY MR. BAZAREK:

14 Q. **You had -- right, you had all these**
15 **witnesses that were inside Apartment 102 on that**
16 **day.**

17 **You could have called them at trial,**
18 **right?**

19 A. No.

20 Q. **Well, why not?**

21 A. Because I don't want to drag my kids
22 through that.

23 Q. **But you could have called them all as**
24 **witnesses in -- in your defense, right?**

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1 A. I -- I -- I refused to do it.

2 Q. Did you tell your public defender that
3 you had all these witnesses that could support
4 you in terms of you alleging that you were
5 framed?

6 A. No.

7 Q. Okay. Well, sir, you don't know who
8 put the heroin in the bathroom, right?

9 A. What do you mean I don't know? I know
10 there weren't no drugs in the bathroom.

11 Q. How -- how would you know that?

12 A. Because I don't bring drugs in my
13 house.

14 Q. How do you know if someone else didn't
15 bring them in?

16 A. Pardon me?

17 Q. How do you know if someone else didn't
18 bring the heroin in the house?

19 A. It wouldn't -- someone did bring it in
20 there.

21 Q. Who brought it in?

22 A. Watts.

23 Q. Who brought it in?

24 A. Watts.

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1 Q. **But you never saw him bring it into the**
2 **bathroom, right?**

3 A. He came out with it.

4 Q. **Okay. Anything bad happen to you while**
5 **you were in the Illinois Department of**
6 **Corrections for your sentence for the drug crime**
7 **you pled guilty to?**

8 A. I can't recall.

9 Q. **Would anything help you recall?**

10 A. No.

11 Q. **Did you receive any medical treatment**
12 **at any time during your time in the Illinois**
13 **Department of Corrections following your**
14 **conviction for the drug crime you pled guilty to**
15 **on April of 2003?**

16 A. No.

17 Q. **Have you ever received, at any point**
18 **during any of your incarcerations, mental**
19 **healthcare treatment while incarcerated?**

20 A. No.

21 Q. **At any time when you were incarcerated,**
22 **did you suffer from depression or anxiety?**

23 A. Yes.

24 Q. **When?**

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1 A. When I did the four years.

2 THE COURT REPORTER: Could you repeat that?

3 BY THE WITNESS:

4 A. When I did the four years, the two
5 years. That was the longest I ever got locked
6 up.

7 BY MR. BAZAREK:

8 Q. Okay. And during -- during those two
9 years when you were in the Illinois Department
10 of Corrections, did you ask to receive any type
11 of medical treatment for depression or anxiety?

12 A. No.

13 Q. Did you ever report to anyone in the
14 Illinois Department of Corrections that you
15 suffered from depression or anxiety?

16 A. No.

17 Q. Did --

18 A. I talked to my wife.

19 Q. Yeah. And when did you talk to your
20 wife?

21 A. When she came to see me.

22 Q. How many times did she come to see you?

23 A. Almost every day.

24 Q. What prison were you in?

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1 A. Vandalia.

2 THE COURT REPORTER: Sorry?

3 BY MR. BAZAREK:

4 Q. **Where?**

5 A. Vandalia.

6 Q. **You're -- you're saying your wife came
7 to visit you --**

8 **(Simultaneous speakers.)**

9 BY MR. BAZAREK:

10 Q. **-- every day in -- while you were in --
11 (Simultaneous speakers.)**

12 BY MR. BAZAREK:

13 Q. **Is it your testimony that your wife
14 came to visit you nearly every day while you
15 were incarcerated in Vandalia?**

16 A. Yes.

17 Q. **And that was over -- that was a
18 two-year period?**

19 A. Yes.

20 Q. **What's the distance from Chicago to
21 Vandalia?**

22 A. I couldn't tell you.

23 Q. **Yeah. Did she ever visit you with
24 anybody?**

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1 A. Yes.

2 Q. **Who would she bring?**

3 A. Also her brother.

4 Q. **Anyone else?**

5 A. And the kids.

6 Q. **Okay. Did your depression and anxiety**
7 **stop after you left Vandalia?**

8 A. No.

9 Q. **Has -- has any doctor ever diagnosed**
10 **you with depression?**

11 A. No.

12 Q. **Has any doctor ever diagnosed you with**
13 **anxiety?**

14 A. No.

15 Q. **Have you ever taken any medication for**
16 **anxiety or depression?**

17 A. No.

18 Q. **Does -- using heroin for your entire**
19 **adult life, does that cause you to have some**
20 **depression?**

21 A. Yes.

22 Q. **Does using heroin your entire adult**
23 **life cause you to have anxiety?**

24 A. Yes.

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1 Q. **When you're out trying to score some**
2 **heroin that you can snort, do you -- do you feel**
3 **some anxiety that you could be arrested by the**
4 **police?**

5 A. Yes.

6 Q. **And why is it that you feel anxiety?**

7 A. Because I snort it before I -- as soon
8 as I get it.

9 Q. **Yeah. But you -- you don't want to go**
10 **back to jail, right?**

11 A. Right.

12 Q. **Does that make -- because that would**
13 **give you anxiety, right?**

14 A. Mm-hmm.

15 Q. **Is that right?**

16 A. Yes.

17 Q. **Okay. Do you have health insurance?**

18 A. Pardon me?

19 Q. **Do you have health insurance?**

20 A. Yes.

21 Q. **And is it good health insurance?**

22 A. No.

23 Q. **Well, what kind of health insurance is**
24 **it?**

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1 A. I don't know what kind it is.

2 Q. Okay. Do you ever go to the doctor for
3 regular checkups?

4 A. No.

5 Q. When's the last time you went to a
6 doctor?

7 A. I haven't.

8 Q. Okay. Well, so when's the last time
9 you went to a doctor?

10 A. I haven't.

11 Q. Have you -- have you ever gone to a
12 doctor in your entire life?

13 A. No.

14 Q. At any time if you've ever been in Cook
15 County Jail or in the Illinois Department of
16 Corrections, have you ever been examined by a
17 doctor?

18 A. No.

19 Q. Now, the insurance that you had --
20 have, it allows you to go to a doctor, right?

21 A. I don't know.

22 Q. Okay. Do your -- did -- your late
23 wife, did she ever say, "Hey, Gregory, you
24 should go see a doctor"?

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1 A. Yes.

2 Q. **And what was your response to that?**

3 A. No.

4 Q. Okay. And why is it that you don't
5 like going to doctors -- or strike that.

6 Why is it that you don't go to doctors,
7 sir?

8 A. I don't know.

9 THE COURT REPORTER: Sorry?

10 BY THE WITNESS:

11 A. I don't know.

12 BY MR. BAZAREK:

13 Q. So you could go to a doctor if you
14 wanted.

15 You just don't feel like it?

16 A. No.

17 Q. Do you have -- or strike that.

18 I know you -- you had heroin yesterday.

19 Do you plan on using heroin later on
20 today after this deposition?

21 A. I don't know.

22 Q. Well, if you -- if you were going to go
23 buy heroin after this deposition is over today,
24 where would you go to buy it?

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1 MS. GIZZI: Objection, form.

2 Go ahead.

3 BY THE WITNESS:

4 A. Wherever they sold it.

5 BY MR. BAZAREK:

6 Q. **All right. And do you have -- do you**
7 **have enough money to buy some bags of heroin**
8 **right now?**

9 A. Yes.

10 Q. **How many bags of heroin do you plan on**
11 **buying the next time you buy it?**

12 A. One.

13 Q. **Okay. And that'll cost you \$10?**

14 A. Mm-hmm.

15 Q. **Is that right?**

16 A. Yes.

17 Q. **What happens if you don't -- if you go**
18 **without heroin for a day, what happens?**

19 MS. GIZZI: Objection, form.

20 BY THE WITNESS:

21 A. It's not good.

22 BY MR. BAZAREK:

23 Q. **Right. What happens to your body?**
24 **What happens?**

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1 MS. GIZZI: Objection, form.

2 BY THE WITNESS:

3 A. It's not good.

4 BY MR. BAZAREK:

5 Q. **Do you get the shakes?**

6 A. It's not good.

7 Q. **I know you say it's not good.**

8 **What does that mean?**

9 A. That means I -- I'd rather not talk
10 about it.

11 Q. **Do you go into withdrawal?**

12 A. Yeah.

13 Q. **And when you go into withdrawal, what**
14 **are the symptoms of that?**

15 A. I'd rather not talk about that.

16 Q. **Do -- do the -- does withdrawal cause**
17 **you anxiety?**

18 A. I'd rather not talk about it.

19 Q. **Well, sir, this is your lawsuit.**

20 A. Yes.

21 Q. **You're -- you're claiming, like,**
22 **damages in this lawsuit, right?**

23 A. Yes.

24 Q. **And so I'm asking you questions about**

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1 **things that could be causing you stress or**
2 **anxiety in your life or depression, and that**
3 **includes your lifelong addiction to heroin,**
4 **right?**

5 A. No.

6 Q. **It doesn't?**

7 A. No.

8 Q. **What are your damage -- what damages**
9 **are you claiming in this lawsuit, sir?**

10 A. Being framed.

11 Q. **Anything else?**

12 A. That's it.

13 Q. **Okay. So you're not claiming any --**
14 **you're not claiming any emotional damages?**

15 A. Yeah. I -- I'm -- I never forget where
16 I come from and what happened to me. No. I
17 never forget that.

18 Q. **What are -- what are your emotional**
19 **damages?**

20 A. Pardon me?

21 Q. **What are your emotional damages in this**
22 **case?**

23 A. I think about it every day.

24 Q. **You think about what?**

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1 A. Being in prison.

2 Q. **For -- for the --**

3 A. For things I didn't do.

4 Q. **You think about that every day?**

5 A. Every day.

6 Q. **So, anyway, going back to -- and when**
7 **you say you think about it every day, what does**
8 **that -- what does that do to you?**

9 A. It makes me mad.

10 Q. **Does it make you anything other than**
11 **mad?**

12 A. No.

13 Q. **Okay. And who are you mad at?**

14 A. The people who did it.

15 Q. **And who is that?**

16 A. Watts, his crew.

17 Q. **Okay. And when you say "his crew," who**
18 **is his crew?**

19 A. I can't recall.

20 Q. **Is Smitty one of the crew?**

21 A. Yes.

22 Q. **Is Coco one of the crew?**

23 A. Yes.

24 Q. **And you're 100 percent certain about**

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1 **that?**

2 A. Yes.

3 Q. **Okay. So it's Smitty. It's Coco, and**
4 **it's Watts.**

5 **Any other officers that you're mad at?**

6 A. The whole -- the whole -- his whole
7 squad.

8 Q. **And you're talking about the officers**
9 **that were there on March 2nd, 2000- --**

10 A. I --

11 THE COURT REPORTER: Sorry. Could you repeat
12 that, Counsel?

13 BY MR. BAZAREK:

14 Q. **You're -- you're talking about the**
15 **officers that were at your apartment on March 2,**
16 **2003, right?**

17 A. If I can recall, all of them was there.

18 Q. **Yeah. When you say "all of them," that**
19 **includes Smitty and Coco, right?**

20 A. Ah, Smitty, yeah.

21 Q. **Yeah. Let's take a look at -- this**
22 **will be -- or strike that.**

23 **Yeah. Let's take a look at Deposition**
24 **Exhibit No. 2. And these are going to be your**

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1 answers to Defendant Darrell Edwards' first set
2 of interrogatories.

(Whereupon, Young Deposition

Exhibit No. 2 was marked for identification.)

6 | BY MR. BAZAREK:

Q. And I want to go to the last page.

And do you see -- do you see that

9 verification there, Mr. Young?

10 A. Mm-hmm.

11 Q. Is that yes?

12 A. Yes.

13 Q. And so you -- you answered the
14 interrogatories under penalty of perjury.

15 Do you read -- can you see that?

16 A. Yes.

17 Q. Okay. So I want to make sure I
18 understand your testimony.

19 Did you read these answers before you
20 signed them or not?

21 A. Yes.

22 Q. Okay. And were -- were your answers
23 truthful?

24 A. Yes.

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1 Q. Okay. Let's take a look at your
2 answers to interrogatory number 18. That's
3 going to be on page 8. And you were asked, "How
4 many total days were you in custody following
5 your March 2nd, 2003 arrest? And according to
6 your answer, sir, it says you were -- you had 51
7 days in custody.

8 So that's Cook County Jail you're
9 talking about?

10 A. Yes.

11 Q. That's when you got in a fight with all
12 these Black P Stones, right?

13 A. I'd rather not talk about it.

14 Q. Right. But that's -- that's during --
15 that's the same time period, right, that 51
16 days?

17 A. Yes.

18 Q. Okay. And then you got sentenced to
19 the four years. And you already talked about
20 being released -- you know, you didn't serve the
21 whole four years.

22 It looks like it's 767 days, right?

23 A. Mm-hmm.

24 Q. Total time in custody; is that right?

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1 A. Yes.

2 Q. Okay. So let's take a look at your
3 answer to number 13. Okay, Mr. Young, the
4 question was, "Please account for your
5 whereabouts, including whom you were with and
6 where you were, in the 24 hours before your
7 March 2, 2003 arrest."

8 Do you see that?

9 A. Mm-hmm.

10 Q. Is that yes?

11 Do you see that?

12 A. Yes.

13 Q. Okay. And then your answer, you say,
14 "Plaintiff cannot recall what he did the day
15 prior to March 2, 2003, but recalls that on
16 March 2nd, 2003, he woke up and drove his wife,
17 Penny Owens, to work in the early morning and
18 then returned home."

19 Do you see that?

20 A. Yes.

21 Q. And the question was asking you what
22 you were you doing before your arrest.

23 Would you agree?

24 A. Yes.

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1 Q. **So why didn't you -- why didn't you put**
2 **in the answer about the car work that you were**
3 **doing that day?**

4 A. Because I couldn't recall.

5 Q. **And why didn't you put in that answer**
6 **anything about the two bags of heroin that you**
7 **snorted that day?**

8 A. I couldn't recall.

9 Q. **So you -- all right. You signed these**
10 **interrogatories on October 30th, 2023.**

11 **And you just recalled that for the very**
12 **first time today?**

13 A. Yes.

14 Q. **Like, during the deposition, that's**
15 **when you first remembered that you snorted two**
16 **bags of heroin --**

17 A. Mm-hmm.

18 Q. **-- on March 2nd, 2003?**

19 A. Mm-hmm.

20 Q. **Is that yes?**

21 A. Yes.

22 Q. **Okay. Let's look at interrogatory**
23 **number 21. And I'm just going to read it. The**
24 **question was, "Excluding petty crimes and**

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1 **traffic offenses, have you committed any**
2 **unlawful acts prior and/or subsequent to**
3 **March 2nd, 2003, that did not result in an**
4 **arrest or charges being brought against you?**

5 **If so, identify the date, location, and**
6 **provide a general description of the unlawful**
7 **acts."**

8 **Do you see that?**

9 A. Yes.

10 Q. All right. Now, you didn't answer that
11 question. Your -- your counsel objected to it.
12 But I want you to answer that question now at
13 this deposition.

14 A. I can't recall.

15 Q. Well, you've -- you've talked about
16 using heroin on a daily basis for your adult
17 life, right?

18 A. Yes.

19 Q. That's -- and those are unlawful acts
20 to use -- to possess and use heroin, correct?

21 A. Yes.

22 Q. So now what -- what about other crimes
23 that you've committed?

24 A. I haven't committed any.

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1 Q. You haven't committed any other crimes?

2 A. No.

3 Q. Okay. Have you ever -- but you've pled
4 guilty to other crimes, right?

5 A. No. Yeah.

6 Q. Okay. Well, did you commit the crimes
7 you pled guilty to?

8 A. No.

9 Q. So is it your testimony that any crime
10 that you've ever pled guilty to you -- you
11 weren't guilty?

12 A. Pardon me?

13 Q. Have you ever -- have you ever --
14 strike that.

15 We've already talked about your plea of
16 guilty to the March 2, 2003 arrest, right?

17 A. Yes.

18 Q. Okay. So on all of the other times
19 that you've plead guilty over the years, were
20 you -- were you guilty of those crimes?

21 A. I haven't pled guilty to no other
22 crime.

23 Q. So the only time you've ever pled
24 guilty in your entire life was for the arrest of

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1 **March 2nd, 2003?**

2 A. That's what I can recall.

3 Q. **Okay. And is it your testimony, sir,**
4 **that other than possessing and using heroin, you**
5 **have committed no criminal acts in your entire**
6 **life?**

7 A. Yes.

8 Q. **Okay. Okay. We can take that -- well,**
9 **you know, I'm sorry.**

10 **Just going back to the last page,**
11 **Mr. Young, that's your -- the verification,**
12 **that's your signature, right?**

13 A. Yes.

14 Q. **Okay. Let's take that down.**

15 **And then let's -- let's look at**
16 **Deposition Exhibit No. 3. That's going to be**
17 **your interrogatory answers to Alvin Jones'**
18 **interrogatories to all plaintiffs in the Watts'**
19 **coordinated pretrial proceedings who filed**
20 **lawsuits after May 1st, 2020.**

21 **(Whereupon, Young Deposition**
22 **Exhibit No. 3 was marked for**
23 **identification.)**

24

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1 BY MR. BAZAREK:

2 Q. And I just want to go to that last
3 page.

4 And you see that verification, sir,
5 Mr. Young?

6 A. Mm-hmm.

7 Q. Is that yes?

8 A. Yes.

9 Q. Okay. And you answered -- and you --
10 and verified these interrogatory answers under
11 penalty of perjury, right?

12 Do you see that?

13 A. Yes.

14 Q. Okay. And you just did that a few days
15 ago.

16 You did it on February 12th, 2024?

17 A. Yes.

18 Q. Okay. We can take that down.

19 I'd like to -- I want to show you some
20 photographs.

21 So I think we're on -- I'm sorry.

22 Ms. Court Reporter, what -- what number are we
23 on for exhibits?

24 THE COURT REPORTER: We are on Exhibit No. 4.

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1 BY MR. BAZAREK:

2 Q. Okay. So I'm going to show you what's
3 being marked as Exhibit No. 4. It's
4 CITY-BG-028601 through 03.

5 (Whereupon, Young Deposition
6 Exhibit No. 4 was marked for
7 identification.)

8 BY MR. BAZAREK:

9 Q. And it's a -- it's a -- this exhibit is
10 going to show a group of individuals. And all I
11 want you to do, Mr. Young, is if --

12 A. Mm-hmm.

13 Q. -- if you see anyone on the exhibit
14 that you know -- and I realize it's not the best
15 quality. It's black and white. But I want you
16 to just go across -- like, look -- look at the
17 different rows. The first person is -- number
18 one, John Bradley. And if you just read across,
19 can you tell me anyone that you know? Just
20 call -- call out -- call out their number and
21 name. You know, for instance, like, "Number
22 one, John Bradley. Yeah, I know him."

23 Can you do that?

24 A. Mm-hmm.

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1 **Q. Can you do it, sir?**

2 **A. Yes.**

3 **Q. Okay. And tell me when you're done**
4 **looking at the first page.**

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

6 **Q. Well, take a look at number 30, Harold**
7 **Owens.**

8 **Is -- do you know who that is?**

9 **A. No.**

10 **Q. Okay.**

11 **A. Where?**

12 **Q. Look at number 30. Maybe make it -- if**
13 **we can make it bigger.**

14 **Is that, like, a relative of yours**
15 **or --**

16 **A. No.**

17 **Q. Okay. So you don't know anyone on that**
18 **first page?**

19 **A. No. I can't see.**

20 **Q. Does it help when we make it bigger for**
21 **you, sir?**

22 **A. Yeah, if you can make it bigger.**

23 **Q. How about number 55, Gregory Young?**
24 **Isn't that your son, or is that you?**

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1 A. Me.

2 Q. **55.**

3 A. Can't see it.

4 Q. **Okay. Let's --**

5 A. Oh, yeah. That's me.

6 Q. **Did you ever hear of Operation Sin**
7 **City?**

8 A. Yep.

9 Q. **What was Operation Sin City?**

10 A. That was a -- a conspiracy thing they
11 got going on.

12 Q. **Okay. Did you get arrested in that**
13 **conspiracy?**

14 A. No.

15 Q. **Did you have any --**

16 A. Yeah. I got arrested, but I got nolle
17 process.

18 Q. **Okay. You --**

19 THE COURT REPORTER: Could you repeat that?

20 BY THE WITNESS:

21 A. I got arrested. I was in the joint
22 already, in the penitentiary, and they threw it
23 out, nolle process.

24

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1 BY MR. BAZAREK:

2 Q. **So you beat the case?**

3 A. Yep.

4 Q. **What were you in prison for when you
5 were charged with that case?**

6 A. For the case of Watts, I believe.

7 Q. **Okay.**

8 A. I can't recall.

9 Q. **Okay. Let's take a -- all right.**

10 **Other than yourself on that first page,
11 do you know -- do you know anyone else?**

12 A. I can't really see a face.

13 Q. **Okay. That's fine. Let's look at the
14 second page. These pictures are a little
15 bigger, so maybe you can -- maybe you recognize
16 some of these individuals.**

17 **How about Patrick Noonan, did you know
18 him?**

19 A. No.

20 Q. **No. Okay. How about underneath him,
21 Wilbert Moore? His nickname I understand was
22 Big Shorty.**

23 **Do you know him?**

24 A. I heard of him.

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1 Q. Did you ever -- were you ever in his
2 presence?

3 A. No.

4 Q. Okay. How about the next person
5 underneath Moore. It's Roy Bennett. He -- his
6 nickname was Shock.

7 Do you know him?

8 A. I heard of him.

9 Q. What did you hear about him?

10 A. Several things.

11 Q. Was he a drug dealer?

12 A. Yeah.

13 Q. Okay. Did you ever get drugs from Roy
14 Bennett?

15 A. Who?

16 Q. Did you ever get drugs from Shock?

17 A. Yeah.

18 Q. Okay. So you would buy heroin from
19 Shock?

20 A. Yeah.

21 Q. And what building did Shock sell heroin
22 out of?

23 A. 540.

24 Q. Okay. And how about Wilbert Moore?

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1 **Did you ever buy heroin from Wilbert Moore, Big
2 Shorty?**

3 A. Yeah.

4 Q. **And where would Big Shorty sell
5 narcotics out of?**

6 A. I believe it was 540.

7 Q. **Okay. How about to the right of Shock,
8 Roy Bennett, is Harold -- Harry Seals.**

9 **He's dec- -- do you know him?**

10 A. Yeah. I heard about him.

11 Q. **And was he -- was he involved in the
12 drug trade at Ida B. Wells?**

13 A. I couldn't tell you.

14 Q. **Okay. Did you ever buy heroin from
15 Harold Seals?**

16 A. Yeah.

17 Q. **Okay. And out of what building would
18 you buy heroin from Harold Seals?**

19 A. 540.

20 Q. **Okay. All right. Let's go down to the
21 left, to the far left. I'm going to show you a
22 picture. Okay. Here's Harold Owens.**

23 **Do you know him?**

24 A. No.

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1 Q. **Okay. How about to the right of him is**
2 **Allen Jackson.**

3 **Did you know him?**

4 A. Heard of him.

5 Q. **He's deceased.**

6 **Did you ever buy any heroin from Allen**
7 **Jackson?**

8 A. No.

9 Q. **Okay. How about the next individual?**
10 **It's Valintino Wilbourn.**

11 **Did you know him?**

12 A. Heard of him.

13 Q. **Was he a drug dealer?**

14 A. Somewhat.

15 Q. **Did you ever buy heroin from him?**

16 A. No.

17 Q. **Okay. How about -- the next person is**
18 **Jovan Towers. He was -- he was associated with**
19 **the 540 building.**

20 **Do you see that?**

21 A. I don't know. Where at?

22 Q. **Yeah, Jovan Towers.**

23 A. Yeah.

24 Q. **All right. Did you know him?**

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1 A. Yeah.

2 Q. **And was he a drug dealer?**

3 A. Yes.

4 Q. **Would you buy heroin from Jovan Towers?**

5 A. Yes.

6 Q. **Was he the -- was he the person you
bought the heroin from on March 2nd?**

7 A. I can't recall.

8 Q. **Okay. How about the next one is Tolorn
Fumbanks; do you see that?**

9 A. Mm-hmm.

10 Q. **Do you remember him?**

11 A. Yeah.

12 Q. **He was associated with the 527 building
where you lived, right?**

13 A. Mm-hmm.

14 Q. **Is that right?**

15 A. Yes.

16 Q. **He was a drug dealer?**

17 A. I can't recall.

18 Q. **You don't -- you can't recall if Tolorn
Fumbanks was a drug dealer?**

19 A. No.

20 Q. **Did you ever buy narcotics from him?**

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1 A. No.

2 Q. Okay. So let's look underneath Tolorn.

3 There is -- do you see Ben Baker?

4 A. Mm-hmm.

5 Q. Now, you -- is that right?

6 A. Yes.

7 Q. You know Ben Baker, right? We already
8 talked about that.

9 A. Mm-hmm, mm-hmm.

10 Q. Okay. Is that yes?

11 A. Yes.

12 Q. Okay. And then do you see next to him
13 is Elgin Moore? I have mentioned his name to
14 you. Take a good look at him.

15 Do you remember him?

16 A. Yeah.

17 Q. He -- he sold drugs for Ben Baker,
18 right?

19 A. I don't recall.

20 Q. Okay. He sold drugs for Ben Baker out
21 of the 527 building, right?

22 A. I don't recall.

23 Q. Okay. I think we've -- sir, any
24 other -- I can't tell. Any -- I think we've --

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1 **oh, go to the -- let's go to the left, Brian**
2 **Ford. Take a look at this person, sir.**

3 A. Hmm?

4 Q. **Do you remember Brian Ford?**

5 A. I can't see him.

6 Q. **Okay. Maybe we'll make it bigger.**

7 **Is that better?**

8 A. No.

9 Q. **Brian Ford? No?**

10 A. (No response.)

11 Q. **Okay. Can you see it?**

12 A. I can't see it that good.

13 Q. **Okay. All right. All right. Did you**
14 **know anyone named Brian Ford?**

15 A. No.

16 Q. **Okay.**

17 A. I can't recall.

18 Q. **Okay. And then let's look at the last**
19 **page of the exhibit. And I just want -- tell**
20 **me -- just like the same that we just went over,**
21 **if you see anyone on there that you know, can**
22 **you tell me, you know, what -- the name and the**
23 **number of the person associated with that name?**

24 A. No. I can't tell.

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1 Q. Okay. As you're looking, I'm just
2 going to call out some names for you. Tell me
3 if you know the person.

4 Harold Owens, Ronald Hendricks, Warren
5 Brakes, Goleather Jefferson, Maurice Coleman,
6 Charles McBride, Dennis Mapp, Shaun James, Larry
7 Pulley, Harold Seay, Angelo Shenault, Howard
8 Taylor, Charles Wilson, Alan Williams, Tahesha
9 White, Ricky Walker, Kareem Potts -- and I think
10 Marland Pettis.

11 | Do you know any of those people?

12 A. No.

13 Q. Okay. We can take that down.

14 Let's take a look at -- this will be --
15 I believe it's Exhibit --

16 | THE COURT REPORTER: 6 -- or 5, Counsel.

17 | MR. BAZAREK: This is 5? Yeah.

18 Let's look at Exhibit 5, DO JOINT 4 --
19 or I'm sorry -- DO JOINT 048313, so just a
20 one-page document.

21 (Whereupon, Young Deposition
22 Exhibit No. 5 was marked for
23 identification.)

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1 BY MR. BAZAREK:

2 Q. Okay. Mr. Young -- actually, it's a
3 two-page document, or is it one or two pages?
4 It's two pages.

5 You recognize the person in this
6 photograph, sir? It's Ben Baker.

7 A. Yes, sir.

8 Q. Right? Okay. Well, are you aware --
9 you can take that down.

10 Are you aware that Ben Baker has
11 testified under oath in his lawsuit that you
12 were selling heroin on March 23rd, 2005, at the
13 527 building? Are you aware of that?

14 A. I can't recall.

15 Q. No. I'm not asking if you recall.

16 I'm saying, Ben Baker has testified
17 under oath in these proceedings involving his
18 lawsuit that you, sir, were selling heroin out
19 of the 527 building on March 23rd, 2005.

20 A. I can't recall.

21 Q. So you're -- you could -- you could
22 have been selling heroin out of the 527 building
23 that day?

24 A. Maybe not.

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1 Q. I just -- I thought you testified at
2 this deposition that you never sold heroin ever.

3 A. I can't recall.

4 Q. So now you -- you're saying you could
5 have sold heroin?

6 A. Could have.

7 Q. Okay. When -- when's the last --
8 when's the last time you could have sold heroin?

9 A. I don't know.

10 Q. Is Ben Baker a friend of yours?

11 A. No.

12 Q. When's the last time you saw Ben Baker?

13 A. I haven't.

14 Q. When's the last time you saw him?

15 A. I haven't.

16 Q. Well, you saw him when you lived in the
17 527 building, right?

18 A. Do you -- do you know how many years
19 that was?

20 Q. Right. You saw him when you lived in
21 the 527 building.

22 He was your neighbor, right?

23 A. Do you know how many years that was?

24 Q. You --

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1 A. Yes, yes, yes.

2 Q. **Yeah. Your kids were friends with his**
3 **kids, right?**

4 A. Yes.

5 Q. **And you knew he was a drug dealer at**
6 **the 527 building, right?**

7 A. Yes.

8 Q. **But he's testifying, sir, that you were**
9 **also a drug dealer at the 527 building, right?**

10 A. No.

11 Q. **That's not true?**

12 A. No. Not that I can recall.

13 MR. BAZAREK: Okay. Well, let's -- let's
14 look at -- we're going to mark this as
15 Deposition Exhibit No. 6. And it's a portion of
16 a deposition transcript from Ben Baker that was
17 taken on August 9th, 2023. So that's going to
18 be Deposition Exhibit No. 6.

19 (Whereupon, Young Deposition
20 Exhibit No. 6 was marked for
21 identification.)

22 MR. BAZAREK: And I -- I'm just going to
23 read -- I'm going to -- I'm going to read it to
24 you, sir. And I'm going to start -- it's on

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1 page 222. And I'm going to start with the
2 question. It's on line 6, and I'm just going to
3 start reading.

4 "Question:" -- and again, this is
5 Ben Baker's testimony in his lawsuit --
6 "Tell me what you remember about
7 March 23rd when you first came into
8 contact with any police officer."

9 "Answer: I remember coming downstairs."

10 "Question: Where were you coming from?"
11 "That's what I don't remember, whether it
12 was Winky's house or whether it was
13 Mika's house. I was coming down the
14 stairs. And when I passed the fourth
15 floor and coming down to the third
16 floor --"

17 "Question: What building are you in?"

18 "Answer: 527. And as I am coming down
19 the stairs, when I get to, like, the
20 fifth or fourth step from the bottom to
21 land on the third-floor landing, that's
22 when Officer Nichols stepped out the
23 hallway. But BayBay and Twany was in the
24 hallway."

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1 "Where did you first see BayBay?"

2 "As I'm coming down the stairs, I see
3 BayBay and Twany right there."

4 "Question: Was that the first time you saw
5 them that day?"

6 "Answer: I can't say that's the first time I
7 saw them that day. I don't know.

8 "Question: Did BayBay or Twany ever sell
9 narcotics for you?"

10 "Answer: Well, BayBay have, like, maybe
11 worked a bundle. But, like, he wasn't,
12 like, somebody, like, was on my payroll.
13 He probably worked a bundle or so."

14 "Question: When you say "worked a bundle,"
15 what does that mean?"

16 "The bags that was in each -- in a particular
17 bag. Like, you had the individual bags.
18 So it might have been 25 individual bags
19 in one plastic bag. And he might have
20 been what they call sick or illing and he
21 needed a blow or something and he didn't
22 have the money for it. So, 'Pops, let me
23 work a bundle, get my ill off.'"

24 "Question: Okay. And have you ever used the

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1 term 'wake-up call'?"

2 "Answer: That's what it's -- that's what it's
3 called, I guess."

4 "Question: Okay."

5 "Answer: Getting your ill off or wake-up
6 or..."

7 "Question: And then what about Twany?"

8 "Answer: I don't know who Twany was working
9 for. But he was there."

10 "Question: Did Twany ever sell narcotics for
11 you?"

12 "Answer: I don't know. He probably served
13 for somebody that was selling for me. I
14 don't know."

15 "Question: All right. The people that would
16 sell for you, they would enlist other
17 individuals to help with the narcotics
18 sales?"

19 "Answer: Depending on what they was doing
20 that day, I guess they would."

21 "Question: Do you know the names of any of
22 the people who would have -- you know,
23 your sellers, the ones on your payroll,
24 who they would have hired to work for

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1 | them?"

2 "Answer: No."

3 "Question: Okay. Did Twany or BayBay have
4 any narcotics with them when you saw
5 them?

6 "Answer: Yeah. They both had a bag in their
7 hand."

8 "Question: What did Twany have in his hand?"

9 "Answer: I believe Twany had cocaine."

10 "Question: BayBay had heroin?"

11 "Answer: Yes."

12 "Question: And did you see them with the
13 narcotics before you see Officer
14 Nichols?"

15 "Answer: Yeah, because I'm coming down the
16 stairs and they standing right -- right
17 there on the third-floor landing. And as
18 I get to, like, the fourth step, fourth
19 or fifth step from the bottom, that's
20 when Nichols step out the hallway with
21 his gun drawn and he's like, 'Y'all come
22 out the hallway.' "

23 "Question: He is calling all three of you?"

24 "Answer: Yeah. Like, 'Y'all come out.' I'm

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1 like, 'Damn. I'm coming down the
2 stairs.' He said, 'Y'all come out the
3 stairwell into the hallway.' So we went
4 into the hallway. He told us to put our
5 hands on the wall. We put our hands on
6 the wall. Then BayBay looked and ran."

7 "Question: What did BayBay do with the heroin
8 that he had?"

9 "I don't know. He might have thrown it down,
10 but I know I ran when he -- after he ran,
11 I ran. And when I got down to the second
12 floor, BayBay was right there, and he was
13 looking. So I said, no, I ain't going to
14 go right there with him. I'm going to go
15 on down the stairs. And when -- I went
16 on down to the first floor. And I was
17 finna go out the building. And then
18 Manny came through the doorway. And he
19 put his hand up, and I stopped."

20 "Now, what happened with Twany?"

21 "He was still up there with Nichols."

22 "So Twany didn't run?"

23 "No. Twany was the closest to Nichols. So I
24 guess when we ran, he probably grabbed

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1 him. I don't know.

2 "Question: What did Twany do with the
3 cocaine?"

4 "I don't know. I guess Nichols got it from
5 him because he put it on me."

6 And then the videographer says something.

7 Go to line 11.

10 "I don't even -- I don't know when the last
11 time I seen Twany. So I don't know."

12 "Question: Is he alive or dead?"

13 "Answer: I'm not sure. I haven't seen him."

14 I'm just going to pass, because he's is
15 talking about Twany. So I'm not going to --
16 I'll keep going.

17 | Let's look at page -- it's 227, line 16.

21 "Answer: Had to be."

22 "Question: And it looked the same type of
23 packaging?"

24 "Answer: From what I saw, it was in a bag."

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1 "Question: How do you know it was heroin?"

2 "Answer: Because I sold heroin before."

3 And let's go to page 238, line 17. I'll
4 read the question.

5 "Why didn't you call Twany and BayBay as
6 witnesses?"

7 And there's an objection by Mr. Baker's
8 attorney. And then he tells us -- Mr. Baker he
9 can answer. Line 23.

10 "Answer: It just never came up. I don't
11 believe they would have come anyway,
12 because BayBay was still using drugs,
13 like, heavy. So what type of witness
14 would he have been? And Twany, I can't
15 recall the last time I seen Twany. So I
16 don't know."

17 BY MR. BAZAREK:

18 **Q. Okay. So everything I've read; is that**
19 **true?**

20 A. I can't recall.

21 **Q. Is -- is it true that you were selling**
22 **heroin that day?**

23 A. I can't recall.

24 **Q. Would anything help refresh your**

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1 **recollection?**

2 A. (Inaudible.)

3 THE COURT REPORTER: I didn't get your
4 answer, sir.

5 THE WITNESS: Pardon -- pardon me?

6 THE COURT REPORTER: I didn't get your
7 answer, sir.

8 BY MR. BAZAREK:

9 Q. **Would --**

10 BY THE WITNESS:

11 A. Oh, I can't recall.

12 BY MR. BAZAREK:

13 Q. **Would anything help recall your
14 recollection?**

15 A. No, sir.

16 Q. **Well, does -- does -- reading Ben
17 Baker's testimony, does that refresh your
18 recollection?**

19 A. No.

20 Q. **Well, he -- he also testified you were
21 really heavy into using drugs at that time,
22 right? Is that true?**

23 A. It probably was.

24 Q. **Yeah. And that was in -- and that was**

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1 **in 2005, right?**

2 A. Yeah.

3 **Q. And he's saying you wouldn't have made**
4 **a good witness for him, because you were using**
5 **drugs all the time, right?**

6 A. Yeah.

7 **Q. And that was true, right?**

8 A. Yeah.

9 **Q. So were there occasions when you and**
10 **Twany would sell narcotics together?**

11 A. No.

12 **Q. You know who Twany is, right?**

13 A. Not really.

14 **Q. Do you know Antwan Bradley? You don't**
15 **know him?**

16 A. No.

17 **Q. Did you ever run away from the police,**
18 **sir?**

19 A. No.

20 **Q. All right. So then if Ben Baker's**
21 **saying that you ran from the police, that would**
22 **be false, right?**

23 A. Yes.

24 **Q. Ben Baker, right. I read his**

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1 **testimony. He also said that you worked a**
2 **bundle for him because you would have been dope**
3 **sick, right?**

4 A. I mean, if that's what he said.

5 Q. **Is that true?**

6 A. No.

7 Q. Oh, so -- so you're -- you're saying
8 that Ben Baker gave false testimony in his
9 deposition, right?

10 A. No.

11 Q. **Well, I don't -- I don't understand**
12 **your answer then.**

13 A. I don't understand it either.

14 Q. **Were -- were -- did you ever work for a**
15 **drug dealer because you wanted to get some**
16 **heroin because you were feeling ill?**

17 A. I don't recall.

18 Q. **Would anything -- so that's possible?**

19 A. I don't recall.

20 Q. **What would help you recall?**

21 A. Hmm. Probably nothing.

22 Q. **Okay. All right. So let's look at Ben**
23 **Baker's deposition testimony from August 10,**
24 **2023.**

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1 MR. BAZAREK: And this will be Exhibit 7, I
2 believe?

3 THE COURT REPORTER: Correct.

4 (Whereupon, Young Deposition
5 Exhibit No. 7 was marked for
6 identification.)

7 BY MR. BAZAREK:

8 Q. Okay. And so, you know, Mr. Young, I
9 was showing your -- one of your booking photos
10 to Baker during his deposition. Actually, I'm
11 showing him the picture that you just looked at,
12 because it's, like, number 55.

13 A. Mm-hmm.

14 MR. BAZAREK: But look at line 5. It's on
15 page 59.

16 "How about 55?"

17 "That's -- it's a bad picture, but that's
18 BayBay, Gregory Young. That's his name,
19 but he got a son named Gregory too, so --
20 but it's hard to tell by the picture.

21 "Question:" -- this is on line 10 -- "You
22 know, go -- I just have a question back
23 to BayBay. On March 23, 2005, was BayBay
24 selling narcotics at Ida B. Wells in the

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1 527 building?"

2 "Answer: That day, yes."

3 BY MR. BAZAREK:

4 Q. And then let's go to -- well, so
5 that -- on the second day of Mr. Baker's
6 testimony he once again said that you were
7 selling narcotics on March 23, '05, right?

8 A. Yeah, if that's what he said.

9 Q. Right. And is that -- is that
10 truthful? Were you selling narcotics that day?

11 A. I can't recall.

12 Q. So you're not disputing that you were
13 selling narcotics on March 23rd, 2005, right?

14 A. I can't recall.

15 Q. Was Ben Baker selling narcotics on
16 March 23rd, 2005?

17 A. I can't recall.

18 Q. So you don't know one way or another
19 whether Ben Baker was selling narcotics on
20 March 23rd, 2005?

21 A. No.

22 Q. Were you at his -- were you at his
23 apartment that day?

24 A. No.

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1 MR. BAZAREK: Okay. We can take that down.

2 Sorry. Give me a moment. You know,
3 let me take about a five-minute break. I've got
4 to, like, sort some exhibits. So let's take a
5 break.

6 THE VIDEOGRAPHER: Okay. We are going off
7 the record at 2:43 p.m.

10 THE VIDEOGRAPHER: This is the beginning of
11 Media Unit 3, and we're back on the record at
12 2:54 p.m.

13 BY MR. BAZAREK:

14 Q. Okay. Mr. Young, I'm going to show you
15 what's being marked as Deposition Exhibit No. 8,
16 and this is BAKER GLENN 013304. And it's just
17 portions of Mr. Baker's testimony involving his
18 May 23rd, 2005 arrest. But this time it was
19 when he testified in his criminal case. Okay?

20 A. Mm-hmm.

21 (Whereupon, Young Deposition
22 Exhibit No. 8 was marked for
23 identification.)

24 MR. PALLE: Excuse me, Bill. Isn't it

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1 March 23rd?

2 MR. BAZAREK: March 23rd, 2005, if I
3 misspoke. Yes. There -- it -- but this -- this
4 transcript is from May 23rd, 2006 --

5 MR. PALLES: Okay.

6 MR. BAZAREK: -- from Mr. Baker's criminal
7 court proceeding. So this is Exhibit 8.

8 MR. PALLES: I've got you.

9 MR. BAZAREK: Okay. Let's look at page --
10 the second page of this document. And I'm just
11 going to start reading:

12 "Question: About 3:40 p.m. where were you?"

13 "Answer: Coming down the stairwell."

14 "Question: Where were you going?"

15 "Answer: I was going to get my mother a
16 birthday gift, because that is her
17 birthday, March the 23rd."

18 "Question: Were you with anybody?"

19 "Answer: No."

20 "Question: By the time you got down, where
21 were you coming from?"

22 "Answer: I was coming from the sixth floor,
23 Apartment 608."

24 "Question: By the time you got down to the

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1 third floor, did you run into anybody
2 else?

3 "Answer: Yeah. There were two individuals
4 standing in the hallway."

5 "Question: Do you know who they were?"

6 "Answer: Yes."

7 "Question: Who were they?"

8 "Answer: It's BayBay and Twany."

9 "Are those the only names you know them by?"

10 "Answer: Well, I know Gregory Young. That's
11 BayBay. But I don't know Twany's real
12 name."

13 "Question: Do you know what BayBay and
14 Twany were doing?"

15 "Answer: Selling drugs."

16 BY MR. BAZAREK:

17 **Q. Is that what you were doing that day,**
18 **Mr. Young, selling drugs?**

19 A. I don't know. Probably.

20 **Q. Well -- well, that's what Ben Baker**
21 **testified you were doing, right?**

22 A. Yes.

23 **Q. Is -- is that false?**

24 A. No.

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1 Q. So you -- you now admit that you were
2 **selling drugs that day?**

3 A. Probably so.

4 Q. **Wh- -- and who were you selling drugs**
5 **for?**

6 A. I don't know.

7 Q. I -- didn't you testify earlier at this
8 **deposition that you never sold drugs?**

9 A. Yes.

10 Q. **So were you lying earlier in this**
11 **deposition?**

12 A. No.

13 Q. **Well, I don't understand. You've**
14 **either sold drugs in your life or you haven't**
15 **sold drugs, right?**

16 A. Right.

17 Q. **So now your testimony is on March 23rd,**
18 **2005, you were selling heroin that day?**

19 A. I can't recall.

20 Q. **Were you -- were you selling heroin for**
21 **Ben Baker?**

22 A. No.

23 Q. **Ben Baker had people that would sell**
24 **drugs for him, right?**

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1 A. I guess. I don't know. I can't
2 recall.

3 Q. **Were you one of those people?**

4 A. I can't recall.

5 Q. **Well, he -- he also testified that you**
6 **worked a bundle for him sometimes, right?**

7 A. I can't recall.

8 Q. **Why can't you recall?**

9 A. Because of my mind won't go back that
10 far.

11 Q. **Okay. And is that the same for what**
12 **occurred on March 2nd, 2003? You really don't**
13 **recall much about that day?**

14 A. I know I didn't have no drugs that day.

15 Q. **Well, you did have that -- drugs that**
16 **day, because you said you snorted two bags of**
17 **heroin, right?**

18 A. Yeah.

19 MR. BAZAREK: Okay. We can take that exhibit
20 down.

21 Now, let's make this Exhibit No. 9.
22 This is DO JOINT 048471.

23

24

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1 (Whereupon, Young Deposition
2 Exhibit No. 9 was marked for
3 identification.)

4 BY MR. BAZAREK:

5 Q. So, sir, this is Exhibit 9. This is a
6 document that we received from the Illinois
7 Department of Corrections, and it's DO JOINT
8 048471. And this shows visits that you had
9 while you were incarcerated.

10 Do you see that?

11 A. Mm-hmm.

12 Q. Is that yes?

13 A. Yes.

14 Q. And it -- and it looks like all these
15 visits are from 1994.

16 So you were incarcerated in 1994; is
17 that correct?

18 A. Yes.

19 Q. Okay. What were you incarcerated for
20 back in 1994?

21 A. I can't recall.

22 Q. Okay. Was it for a drug offense?

23 A. No. It was the same case.

24 Q. 1994?

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1 A. No. I don't know. I don't know. I
2 can't recall.

3 Q. Okay. But looking at this document, it
4 looks like you were -- in 1994 you were in
5 Joliet and you were in Vandalia, and you were in
6 Stateville.

7 **And you were at Westside ATC? What is**
8 **that?**

9 A. It's a work release.

10 Q. Okay. So that means you're not --
11 you're not incarcerated.

12 **You're, what, doing some work?**

13 A. Yeah.

14 Q. Okay. And then where -- where are you
15 living when you're doing work at Westside ATC?

16 A. Oh, I can't recall.

17 Q. And then your visitors included your
18 wife, Penny Owens, right?

19 A. Yes.

20 Q. And then who's Azline Owens? Who is
21 that?

22 A. That's her sister.

23 Q. **That's your sister?**

24 A. Her sister.

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1 Q. **Oh, okay. And then who's Trina --**

2 A. That's her sister.

3 Q. **-- Aremu?**

4 **Who's that?**

5 A. That's her sister.

6 Q. **Who's J-I-M-O-H?**

7 A. That's her husband.

8 Q. **Whose husband?**

9 A. Trina's.

10 Q. **Okay. And then who's Maurice Owens?**

11 A. Her brother.

12 Q. **And then Monica Owens?**

13 A. It's his wife.

14 Q. **Okay. All right. So these are the --**

15 **did you ever receive visit- -- did you ever**
16 **re- -- have visitors while you were incarcerated**
17 **other than during 1994?**

18 A. Yes.

19 Q. **Okay. And so did you have visitors**
20 **following your March 2nd, 2003 arrest until you**
21 **were released from the penitentiary?**

22 A. Yes.

23 Q. **And that would have been Penny, your**
24 **wife, right? Right?**

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1 A. Yes.

2 Q. **Anyone else?**

3 A. No.

4 MR. BAZAREK: Okay. We can take that down.

5 All right. Let's go to the next exhibit. This
6 is DO JOINT 048811. And this will be exhibit --
7 is this 10?

8 THE COURT REPORTER: Yes.

9 (Whereupon, Young Deposition
10 Exhibit No. 10 was marked for
11 identification.)

12 BY MR. BAZAREK:

13 Q. **Okay. This is another document,**
14 **Mr. Young, that we received from the Illinois**
15 **Department of Corrections. It's DO JOINT**
16 **048811. And this shows -- if you look at the**
17 **very bottom, your first incarceration was**
18 **February 4th, 1994.**

19 A. Mm-hmm.

20 Q. **Does that sound right?**

21 A. I can't recall.

22 Q. **Okay. Okay. What was your --**

23 MS. GIZZI: We can't see it. We can't see it
24 on the screen.

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1 MR. BAZAREK: You can't see it?

2 BY MR. BAZAREK:

3 Q. Okay. Well, I -- I'm just -- I'll read
4 it. It looks like February 4th, 1994, you were
5 received in Joliet, and that would have been for
6 your first incarceration.

7 Does that sound right?

8 A. No.

9 Q. Oh -- oh. You were incarcerated before
10 1994?

11 A. I don't understand what you're saying.

12 Q. Sir, all I'm trying to do is to find
13 out the -- the very first time you ever were
14 incarcerated in the Illinois Department of
15 Corrections.

16 Was it during 1994?

17 A. Oh, yeah. 1990- -- yeah, yeah.

18 Q. Okay. And then what were you
19 incarcerated for that very first time back in
20 1994?

21 A. Oh, possession.

22 Q. Of narcotics?

23 A. Yes.

24 Q. What type of narcotics?

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1 A. Heroin.

2 Q. Um, okay. And then from 1994 you had
3 various incarcerations up to 2014; is that
4 correct? Is that right?

5 A. I don't -- I can't see it.

6 Q. Okay. Well, I'm reading it. And it
7 looks like you were -- actually, you were
8 paroled out of East Moline on November 4th,
9 2013.

10 Does that sound right?

11 A. Yeah.

12 Q. Is that the last time you spent time in
13 the penitentiary?

14 A. Mm-hmm.

15 Q. And is that right?

16 A. Yes.

17 Q. 2013?

18 A. Yes.

19 Q. And you were paroled, right?

20 A. Yes.

21 Q. And then it looks like you were
22 discharged from the parole the following year,
23 November 4th, 2014; is that right?

24 A. Yes.

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1 Q. Okay. And so I'm correct, the last
2 time you were ever in a penitentiary was in
3 2013; is that right?

4 A. Yes.

5 Q. During the time when you were
6 incarcerated, did you ever make any phone calls?

7 A. Ah, I can't recall.

8 Q. Okay. Did you ever talk about your
9 March 2nd, 2003 arrest in any phone calls that
10 you made while you were incarcerated in the
11 Illinois Department of Corrections?

12 A. No.

13 Q. You did not?

14 A. I -- I don't -- I can't recall. I
15 don't -- I don't know.

16 Q. So you could have?

17 A. To my wife. Probably, yeah, to my
18 wife.

19 Q. Okay. Did you ever -- did -- in any of
20 the phone calls to your wife, did you ever tell
21 her over the telephone that you were
22 incarcerated?

23 A. She knows it.

24 Q. Strike -- strike that.

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1 **That's -- I -- at any time did you**
2 **ever -- or strike that.**

3 **At any time during any calls that you**
4 **had while you were at the Illinois Department of**
5 **Corrections, did you talk about your March 2nd,**
6 **2003 arrest?**

7 A. Probably did.

8 Q. **And what -- and what would -- what**
9 **would you probably have said about your**
10 **March 2nd, 2003 arrest?**

11 A. I can't recall, sir.

12 Q. **So you know you did talk about it.**

13 **You just don't remember what you said;**
14 **is that true?**

15 A. Yes, sir.

16 Q. **Okay. We can take that down.**

17 **Okay. Mr. Young, I'm just going to go**
18 **through some of your prior arrest reports.**
19 **Okay? I'm just going to go right down the line.**
20 **And I'm going to start with DO JOINT 049653 to**
21 **57.**

22 MR. BAZAREK: And I think -- are we on 11 now
23 for exhibits?

24 THE COURT REPORTER: Correct.

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1 (Whereupon, Young Deposition

2 Exhibit No. 11 was marked for
3 identification.)

4 MR. BAZAREK: Okay. So this will be
5 Deposition Exhibit No. 11.

6 BY MR. BAZAREK:

7 Q. Okay, Mr. Young. It looks like you
8 were arrested on May 7th, 2005.

9 It lists your residential address as
10 13105 South Daniel Drive in Chicago; is that
11 right?

12 A. Mm-hmm.

13 Q. Is that -- were you living there at the
14 time?

15 A. You say it's where?

16 Q. 13105 South Daniel Drive in Chicago.

17 A. Yes.

18 Q. Who did you live with at that address?

19 A. My wife.

20 Q. Well, I thought you said you were
21 living at the 527 building until you moved out
22 in 2007.

23 A. I said --

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1 (E-mail received sound over
2 Zoom.)

3 BY THE WITNESS:

4 A. -- I couldn't recall.

5 BY MR. BAZAREK:

6 Q. Okay. So now --

7 THE COURT REPORTER: Could you repeat that?

8 BY THE WITNESS:

9 A. I said I couldn't recall.

10 BY MR. BAZAREK:

11 Q. Okay. All right. So it's -- did you
12 move out -- had you moved out of Ida B. Wells by
13 2005?

14 A. I can't recall, sir.

15 Q. Okay. How long did you reside at 13105
16 South Daniel Drive in Chicago?

17 A. I can't recall.

18 Q. Okay. Would anything help you recall?

19 A. Maybe.

20 Q. Okay. So do you remember this arrest
21 on March -- or I'm sorry -- on May 7th, 2005?

22 A. I can't recall.

23 Q. I'll just read it in the narrative. If
24 we can go to page -- I'll read it here. "This

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1 **is an onview arrest by Tru Beats 4230D and 4230A**
2 **under incident number 05-2159.**

3 **"In summary, R/Os conducted a premise**
4 **check at the above location, which is CHA**
5 **property, which has no trespassing signs posted.**
6 **During the premise check, ROs came into contact**
7 **with the above individual who was unable to**
8 **produce ID saying that he legally resided in the**
9 **building.**

10 **Above was placed into custody, and a**
11 **custodial search revealed four clear plastic**
12 **bags, each containing a rock-like substance,**
13 **suspect crack cocaine, from his left front**
14 **jacket pocket. Above was transported to the 2nd**
15 **District and the above suspect crack cocaine was**
16 **inventoried."**

17 **So do you remember being arrested, sir,**
18 **with crack cocaine on May 2nd --**

19 **A. I can't --**

20 **Q. -- 2005?**

21 **A. I can't recall, because it -- it was**
22 **thrown out anyway.**

23 **Q. Okay. But on that day you weren't**
24 **arrested with heroin. You were arrested with**

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1 **crack cocaine, right?**

2 A. Yeah, I guess.

3 Q. **Okay. And where would you get the --**
4 **where did you get the crack cocaine that you had**
5 **with you on that day?**

6 A. I -- I don't know. I can't recall.

7 Q. **And would you -- well, where at**
8 **Ida B. Wells would -- if you were going to buy**
9 **crack cocaine at Ida B. Wells, where would you**
10 **buy it from?**

11 A. Either -- all over.

12 Q. **Well -- well, was there a particular**
13 **building that you would buy the crack cocaine**
14 **from at Ida B. Wells?**

15 A. Not necessarily.

16 Q. **Well, I know you said you would go to**
17 **the 540 building to buy the heroin. So I'm**
18 **wondering where you would get the crack cocaine**
19 **from.**

20 A. I guess from the 540 building too.

21 Q. **Okay. And you would get the -- you**
22 **would buy the crack cocaine from the 540**
23 **building, because you wouldn't want your kids to**
24 **see you buying crack cocaine, right?**

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1 MS. GIZZI: Objection, form.

2 Go ahead.

3 BY THE WITNESS:

4 A. Yes.

5 BY MR. BAZAREK:

6 Q. **And then when you would -- how would**
7 **you take the crack cocaine? How would you --**
8 **would you smoke it?**

9 A. No.

10 Q. **Would you snort it?**

11 A. No.

12 Q. **Well, how -- how would you ingest it?**
13 **How would you get it into your system?**

14 A. I didn't use it.

15 Q. **Well, according to this arrest report,**
16 **you had four bags of crack cocaine that day,**
17 **right?**

18 A. I guess.

19 Q. **Right. So when -- what would you --**
20 **would you sell the crack cocaine that you had?**

21 A. No.

22 Q. **You'd use it, right?**

23 A. If you say so, sir.

24 Q. **Well, sir, this is your arrest from**

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1 **May 7, 2005.**

2 A. True.

3 **Q. And you were arrested with four bags of**
4 **crack cocaine, right?**

5 A. True.

6 **Q. So what did you have the crack cocaine**
7 **with you for?**

8 A. I guess I was smoking it.

9 **Q. Okay. And would you have a crack pipe?**

10 A. Pardon me?

11 **Q. Would you have a crack pipe to smoke**
12 **it?**

13 A. That's the only way you can smoke it.

14 **Q. Right. And then where would you get**
15 **the crack pipe to -- to smoke the crack cocaine?**

16 A. From the store.

17 **Q. Okay. Was there a particular store**
18 **that you would go to to buy the crack cocaine?**

19 A. No.

20 **Q. Okay. And when you were smoking crack**
21 **cocaine, how many bags of crack cocaine would**
22 **you smoke on any given day?**

23 A. I didn't.

24 **Q. Well, what does that mean?**

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1 A. I didn't.

2 Q. **Well, how many bags of crack cocaine**
3 **would you smoke on any given day?**

4 A. What do you have to do with this?

5 Q. **Well, sir, this is your -- this is your**
6 **arrest.**

7 A. One, maybe four. I don't know.

8 Q. **Okay.**

9 THE COURT REPORTER: Could you repeat that?

10 BY THE WITNESS:

11 A. One, maybe four. I don't -- I don't
12 know.

13 BY MR. BAZAREK:

14 Q. **Where would -- where would you get the**
15 **money to buy the crack cocaine?**

16 A. Work on cars.

17 Q. **Okay. And then would -- were there**
18 **days where you would -- you would snort heroin**
19 **and smoke crack cocaine on the same day?**

20 A. Yeah.

21 Q. **Okay. And you're saying, sir, that**
22 **this case got thrown out?**

23 A. Yes.

24 Q. **Okay.**

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1 A. I believe so.

2 MR. BAZAREK: Yeah. All right. Let's go to
3 the next exhibit. This is 049658 to 62.

4 And, Ms. Court Reporter, what exhibit
5 are we on for this one?

6 THE COURT REPORTER: 12.

7 (Whereupon, Young Deposition
8 Exhibit No. 12 was marked for
9 identification.)

10 BY MR. BAZAREK:

11 Q. Okay. So I'm showing you Exhibit 12.
12 This is an arrest, sir, from April 12, '06.

13 Now, you see here, Mr. Young, it has
14 that address again of 131 [sic] South Daniel
15 Drive. Do you see that?

16 A. Mm-hmm.

17 Q. Is that yes?

18 A. Yes.

19 Q. So is it true on April 12th, 2006, you
20 were living at 131 South Daniel?

21 A. I can't recall.

22 Q. Okay. Were there times when you were
23 living on South Daniel and then you would go
24 to -- you would go to Ida B. Wells to obtain

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1 **illegal narcotics?**

2 A. Yeah.

3 **Q. Okay. And you would -- you would go**
4 **there whether you'd get heroin or crack cocaine,**
5 **right? Right?**

6 A. Yes, yes.

7 MR. BAZAREK: Okay. Let's go to the next
8 exhibit. This will be DO JOINT 049663 to 667.
9 And we're marking this as Exhibit --

10 THE COURT REPORTER: 13.

11 (Whereupon, Young Deposition
12 Exhibit No. 13 was marked for
13 identification.)

14 BY MR. BAZAREK:

15 **Q. So this is another arrest, sir.**

16 **It has you residing at 13105 South**
17 **Daniel Drive; is that right?**

18 A. Yes.

19 **Q. Did -- did you get -- were you -- did**
20 **you get kicked out of -- or strike that.**

21 **Did anyone lose the lease at**
22 **Ida B. Wells?**

23 A. No.

24 **Q. Okay. What was -- what was located at**

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1 **13105 South Daniel Drive?**

2 A. I can't recall.

3 **Q. Was it a house, an apartment?**

4 A. Probably. I -- I can't recall.

5 **Q. Okay. So on this Exhibit No. 13,**
6 I'm -- let's go to the narrative section. It's
7 on page 2. I'm just going to read it. "In
8 summary, RO's while conducting a narcotics
9 investigation at the above location observed the
10 above subject standing in the hallway.

11 As ROs approached the subject, the
12 subject turned away from ROs, then placed a
13 plastic bag inside his sweatpants. ROs grabbed
14 the subject and retrieved one large clear
15 plastic bag containing seven small Ziplock
16 baggies containing a white rock-like substance
17 suspect crack cocaine.

18 ROs recovered the plastic bag from
19 inside the subject's inner left pant leg. The
20 subject was placed in custody per Miranda, then
21 transported to the 2nd District for processing."

22 Okay. So what do you remember, sir,
23 about your May 2nd, 2006 arrest?

24 A. I can't recall.

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1 **Q. Where did you get the crack cocaine**
2 **from that you had?**

3 A. Ida B. Wells, I guess.

4 **Q. Yeah. Were you using it that day or**
5 **selling it or both?**

6 A. Use it.

7 **Q. Were there times where you would use**
8 **crack cocaine or heroin and you would be selling**
9 **it too?**

10 A. No.

11 **Q. Okay. And the -- and the crack -- the**
12 **seven bags of crack cocaine that you had with**
13 **you on this day, you would smoke -- you would be**
14 **smoking that crack cocaine.**

15 **That was your plan, right?**

16 A. Yes.

17 **Q. Okay. Do you remember where you --**
18 **where you obtained the crack cocaine from on**
19 **that day?**

20 A. No.

21 MR. BAZAREK: Okay. So let's take that down,
22 and we'll go to the -- it'll be Exhibit --

23 THE COURT REPORTER: 14.

24 MR. BAZAREK: 14. So that's DO JOINT 049668

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1 to 72. Wha- -- yeah. Okay.

2 (Whereupon, Young Deposition
3 Exhibit No. 14 was marked for
4 identification.)

5 BY MR. BAZAREK:

6 Q. So, now, this is an August -- I'm
7 sorry -- August 5th, 2006 arrest.

8 That's a picture of you in the arrest
9 report, right, sir?

10 A. I can't see.

11 MS. GIZZI: We can't -- we can't see it.

12 BY MR. BAZAREK:

13 Q. Okay. Sorry. Let's go to the --
14 that's you, right?

15 A. Yes.

16 Q. And this is the arrest for August 5th,
17 2006.

18 So this one there is -- it looks like
19 if you go to the -- down the first page, it
20 looks like there were multiple charges for you
21 this day.

22 Do you see that? You had possession
23 of -- of cocaine. You had drug paraphernalia.
24 You -- then you had -- it looked like you had

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1 some traffic violations.

2 Do you see that?

3 A. Mm-hmm.

4 Q. Is that right?

5 A. Yeah.

6 Q. Okay. Were -- did you have -- at one
7 point, did you have a CDL license, sir?

8 A. No.

9 Q. Okay. I'll just read this -- I'll read
10 the narrative. "Above-named subject curbed
11 after proceeding through solid red traffic
12 light. Subject did not have a valid driver's
13 license, and as such was taken into custody.
14 Custodial search of the vehicle reveal- --
15 revealed a small glass tube containing a whi- --
16 white rock-like substance, suspect crack
17 cocaine. Offender admitted to owning
18 contraband, was read rights per Miranda, and
19 transported to the 3rd District for processing."

20 Okay. So do you remember this arrest,
21 sir?

22 A. I can't recall.

23 Q. Okay. Do you remember whose car you
24 were driving?

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1 A. I can't recall.

2 Q. **Did you own a car in 2006?**

3 A. I can't recall.

4 Q. **Well -- did --**

5 A. I believe so. I believe so.

6 Q. **You believe so. And whose -- whose --**

7 **where did you get -- what kind of car was that?**

8 A. I can't recall.

9 Q. **Okay. Did Penny have a car?**

10 A. No.

11 MR. BAZAREK: Okay. Okay. Let's go on.

12 Let's look at DO JOINT 049673 to 77. And this
13 is a September 25th, 2007 arrest. And this will
14 be -- are we on -- is it 14?

15 THE COURT REPORTER: 15.

16 MR. BAZAREK: We're on 15? This is
17 Exhibit 15.

18 (Whereupon, Young Deposition
19 Exhibit No. 15 was marked for
20 identification.)

21 BY MR. BAZAREK:

22 Q. **So here's another possession case.**

23 **Do you see -- do you see yourself in
24 the -- in the booking photo there, sir?**

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1 A. Yes, sir.

2 Q. Okay. That's you, right?

3 A. Yes, sir.

4 Q. Okay. I'm going to read the -- read
5 the narrative. "This is an Area 1 ANET arrest.
6 The above-listed offender was observed while
7 conducting a narcotics surveillance to conduct a
8 controlled narcotics purchase. This offender at
9 the above location was observed tendering an
10 unknown amount of U -- USC to an un- -- unknown
11 male 1 and in exchange accepted suspect
12 narcotics and then walked in A/Os direction.

13 A/Os exited their vehicle to conduct a
14 narcotics investigation. At that time, A/O
15 observed a small plastic bag protruding from his
16 right hand. Arresting officer recovered this
17 item and found it to be suspect crack cocaine.
18 The offender was placed into custody, advised --
19 and advised of his rights, and then transported
20 to Area 1, 002 District for processing."

21 So do you remember anything about this
22 arrest, sir, where you were arrested with crack
23 cocaine?

24 A. I can't recall.

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1 Q. Do you -- do you know where you got the
2 crack cocaine from?

3 A. I can't recall.

4 MR. BAZAREK: Okay. We can take that one --
5 let's keep going. We're next at -- is it DO
6 JOINT 049678 to 82?

7 | And what exhibit are we on?

8 THE COURT REPORTER: 16.

9 (Whereupon, Young Deposition
10 Exhibit No. 16 was marked for
11 identification.)

12 BY MR. BAZAREK:

13 Q. 16. Here's a -- now here's a -- here's
14 a possession of heroin arrest.

15 Do you see your photograph there, sir;
16 is that you?

17 A. Yes, sir.

18 Q. So this is May 27, '09. And let's --
19 I'm going to get to the narrative. I'll just
20 read it.

21 I'll start with, "A/Os working in an
22 area of high narcotics traffic observed the
23 above standing by a tree at the above location.
24 As A/Os approached, the above looked in A/Os'

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1 direction and placed a small object in the bark
2 of the tree. A/Os exited vehicle, recovered two
3 Ziplock packets of suspect heroin from the tree
4 bark where the above was seen placing a small
5 item. The above was placed under arrest and
6 transported to 2nd District for processing.
7 Name check, clear. No investigative alerts."

8 Do you remember this arrest, sir, where
9 you were hiding heroin in the -- in the tree
10 bark?

11 A. I can't recall.

12 Q. Do you know where you got the heroin --

13 A. I can't recall.

14 Q. -- that day that you were hiding in the
15 tree bark?

16 A. I can't recall.

17 Q. Okay. Now, this has a residence
18 address of 5929 South Sangamon.

19 Were you ever living there?

20 A. I can't recall. Maybe. I can't
21 recall.

22 Q. May -- May of '07? Or I'm sorry.

23 May of '09? You don't know?

24 A. No.

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1 MR. BAZAREK: All right. I'll take that one
2 down.

3 Let's look at DO JOINT 049683 to 87.

4 And this is Exhibit --

5 THE COURT REPORTER: 17.

6 (Whereupon, Young Deposition
7 Exhibit No. 17 was marked for
8 identification.)

9 BY MR. BAZAREK:

10 Q. Okay. Here's another possession case,
11 sir. This is May 26th, 2011.

12 Do you see that picture? Is that you?

13 A. Yes.

14 Q. And then the residential address here
15 is 8938 South Wallace; is that right?

16 A. Yes.

17 Q. At that point, Ida B. Wells buildings
18 had been closed down, right, by 2011?

19 A. I believe so.

20 Q. Okay.

21 A. I can't recall.

22 Q. Well, when Ida B. Wells closed down,
23 the buildings, did you have to go somewhere else
24 to get your heroin or your crack cocaine that

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1 you used?

2 A. I can't recall.

3 Q. But where would you -- where would you
4 go to get heroin or crack cocaine after
5 Ida B. Wells, the buildings, were closed down?

6 A. I can't recall.

7 Q. Okay. So let's look at the narrative
8 of this arrest from 26 May of 2011. This --
9 I'll start with "This is an onview arrest by
10 26 -- 2161E in that R/Os while on aggressive
11 patrol observed above-listed subject loitering
12 at the above location. As R/Os approached
13 subject for a field interview, R/Os observed
14 subject had a clenched fist.

15 When asked to show his hands, subject
16 immediately displayed a clear plastic bag filled
17 with white powdery sus- -- substance (suspect
18 co- -- heroin, Inventory 12324459) and tore it
19 open in an attempt to destroy said item.

20 Narcotics recovered by PO Thomas
21 inventoried under 12324459. Subject was placed
22 into custody, Mirandized, transported to 021 for
23 processing. Subject related to R/Os, 'I've got
24 a problem. I've been doing it for a long time,'

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1 **in regards to the narcotics."**

2 **Do you see that, sir, what I just read?**

3 A. Yeah.

4 Q. **Is that what you told the police that**
5 **day? "I've got a problem. I've been doing it**
6 **for a long time"?**

7 A. I can't recall.

8 Q. **Well, that was true, right?**

9 A. Huh?

10 Q. **That -- that statement would be true,**
11 **right?**

12 A. Yeah.

13 Q. **That you had a problem and you'd been**
14 **doing it a long time, right?**

15 A. Yeah.

16 MR. BAZAREK: Okay. All right. Let's go to
17 DO JOINT 049688 to 92. It's another possession
18 arrest, sir. This is on May 8th, 2013.

19 BY MR. BAZAREK:

20 Q. **That's a picture of you, right?**

21 A. Yes.

22 Q. **Okay.**

23 THE COURT REPORTER: That's 18.

24 MR. BAZAREK: Thank you.

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1 (Whereupon, Young Deposition

2 Exhibit No. 18 was marked for
3 identification.)

4 BY MR. BAZAREK:

5 Q. And I'll read this narrative, and I'll
6 just start reading with "While on routine
7 patrol, A/Os observed above subject and two
8 other M/ls causing a loud disturbance at above
9 location. A/Os announced office and approached
10 for" -- it's a typo -- "filed interview. Above
11 looked in A/Os' direction and began to walk
12 away. A/O Brown observed subject drop to the
13 ground one clear Ziplock plastic bag containing
14 white powder substance suspect heroin.
Recovered by A/O Brown." You were placed into
custody. Okay.

17 Do you remember this arrest, sir, from
18 May 29, 2013?

19 A. I can't recall.

20 Q. Do you know where you got the heroin
21 from that you had that day?

22 A. I can't recall.

23 MR. BAZAREK: Okay. Let's go to the next
24 exhibit, DO JOINT 049693 to 97.

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1 THE COURT REPORTER: 19.

2 MR. BAZAREK: Thank you.

3 (Whereupon, Young Deposition

4 Exhibit No. 19 was marked for
5 identification.)

6 BY MR. BAZAREK:

7 Q. So this is 12 April 2014. Your
8 residential address, 1501 East 69th Place,
9 Apartment 1E.

10 Do you remember living there?

11 A. Yes.

12 Q. Okay. So this one's a little
13 different.

14 Were -- you've been arrested for
15 robbery, sir?

16 A. No.

17 Q. Have you ever possessed a firearm?

18 A. No.

19 Q. Have you ever pointed a firearm at
20 anyone?

21 A. No.

22 Q. Have you ever shot anyone?

23 A. No.

24 Q. Okay. So I'm just going to read this

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1 narrative. "A/Os responded to a person with a
2 gun call at 6700 South Stony Island Avenue with
3 a description of an older male black dressed
4 in -- dressed in black, armed with a chrome
5 handgun. A/Os observed subject matching
6 description given (black baseball cap, black
7 jacket, and black jeans) at the above address of
8 arrest and approached for a field interview.

9 At this time, A/Os were approached by a
10 subject (now known as Weathers, Thomas) who
11 stated that he was the victim of a robbery and
12 the person we had detained was the one who
13 robbed him on March -- on 28 March 2014. Victim
14 then supplied A/Os with the case report number
15 recorded under" -- and then RD.

16 "Victim stated on original date above
17 offender and another male black approached him
18 with a handgun and robbed him of his iPhone and
19 \$3,000 USC, which was his tax return. Both
20 offenders fled.

21 Victim positively identified above
22 offender on today's date. Offender placed in
23 custody, read his Miranda rights on scene at
24 1121 hours and transported to -- into 3rd

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1 District for further processing. Arrestee
2 stated post-Miranda in the 3rd District and not
3 verbatim that he was out there, but there was
4 another dude, Angelo, involved in that incident.
5 They might call him Enlo, and he has long
6 dreads, about 5'7", 170, dark skin."

7 Okay. You -- who -- do you know
8 someone named Angelo who robs people?

9 A. I can't recall.

10 Q. Do you remember -- do you remember --
11 do you remember the victim, Mr. Weathers, like,
12 identifying you as the one who robbed him?

13 A. I can't recall.

14 Q. Did you -- did you rob Mr. Weathers --

15 A. It was --

16 (Simultaneous speakers.)

17 Q -- of a --

18 A. -- never processed.

19 THE COURT REPORTER: Sorry. Could you repeat
20 that?

21 | BY THE WITNESS:

22 A. It was never processed.

23 BY MR. BAZAREK:

24 Q. Did you rob --

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1 A. No.

2 Q. -- **Mr. Weathers** of his iPhone and
3 \$3,000?

4 A. No, sir.

5 Q. When you say it was never processed,
6 what do you mean?

7 A. They let me go.

8 Q. Okay. So you do remember this event,
9 right?

10 A. Pardon me?

11 Q. You remember this arrest, right?

12 A. Yeah.

13 Q. And who was -- who was Angelo with the
14 long dreads?

15 A. That was the guy that I just met.

16 Q. Someone you had just met?

17 A. No. Someone that I knew.

18 Q. Yeah. And so did you observe Angelo
19 rob **Mr. Weathers** with a handgun?

20 A. No.

21 MR. BAZAREK: Okay. All right. We can take
22 that one down. Let's look at DO JOINT 09698
23 [sic] to 049703.

24 THE COURT REPORTER: 20.

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1 MR. BAZAREK: Yeah.

2 (Whereupon, Young Deposition
3 Exhibit No. 20 was marked for
4 identification.)

5 BY MR. BAZAREK:

6 Q. This is a May 12th, 2014 arrest.

7 Do you remember this arrest? It's a --
8 it looks like another armed robbery with a
9 firearm.

10 A. No.

11 Q. May 12th, 2014.

12 A. No.

13 Q. Have you ever been a stickup man?

14 A. No.

15 Q. Okay. Let's read this one, the
16 narrative. "R/Os having knowledge that the
17 listed subject was -- was wanted under RD
18 203372 -- 2, toured areas frequented by the
19 subject and placed him into custody in that he
20 was positive -- positively identified as the
21 subject who came up to the listed victim and
22 displayed a .38 chrome gun and stated, 'I'm
23 going to pop you. Give me your money,' and hit
24 the victim in the mouth with a gun.

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1 R/Os transported the subject to 003 for
2 processing and inventory. The sub- -- the
3 subject is warrant, inventory alert, probation,
4 GIPP, TRAP, and two degree of association free."

5 Okay. "However, the subject is
6 self-admitted El Rukn gang member and has \$29
7 USC and Illinois ID."

8 So have you ever been an El Rukn, sir?

9 A. Pardon me?

10 Q. Have you ever been an El Rukn?

11 A. No.

12 Q. Is that -- have you ever identified
13 yourself to law enforcement as an El Rukn?

14 A. No.

15 Q. Okay. All right. We'll take that one
16 down. So now we're 049707 to 24.

17 THE COURT REPORTER: Number 21.

18 MR. BAZAREK: Yeah.

19 (Whereupon, Young Deposition)

22 BY MR. BAZAREK:

23 Q. Well, you know what? This is -- we're
24 going to -- well, I'll just -- this is your rap

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1 **sheet, sir. I just have a couple questions.**

2 **See, for your date of birth, on this**
3 **one it has September 1, 1962. That's -- I am**
4 **correct? That is not your birthday, right?**

5 A. Thank you.

6 Q. **Mr. Young?**

7 A. Yes, sir. It's not my birthday.

8 Q. **It's not your birthday. May- -- when**
9 **you were first -- arrested for the very first**
10 **time, did you give a fake birth date --**

11 A. No.

12 Q. **-- for your date of birth?**

13 **Were you ever arrested as a juvenile?**

14 A. No, sir.

15 Q. **Did you ever spend time in the Audy**
16 **Home?**

17 A. No, sir.

18 Q. **Remember we were talking about your**
19 **first incarceration was in 1994? Do you**
20 **remember that?**

21 A. Mm-hmm.

22 Q. **Is that yes?**

23 A. I can't recall.

24 Q. **Okay.**

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1 A. You say what now?

2 Q. **We were -- remember we were looking at**
3 **your -- the IDOC records, and it showed the very**
4 **first time you were incarcerated was in 1994.**

5 **Do you remember that?**

6 A. Yes, sir.

7 Q. Okay. So let's look -- let's just go
8 back to the very end of your arrest history.
9 Some -- some people call it a rap sheet.

10 A. Mm-hmm.

11 Q. If you look at back in -- it looks like
12 1982, it has a date of birth for you,
13 September 4th, 1960. And you received two years
14 probation. You were convicted of some type of
15 theft.

16 **Do you remember that?**

17 A. Yes, sir. I can't recall, but I --

18 Q. **What was that --**

19 A. I'm guessing --

20 Q. **What was the theft?**

21 A. I don't -- I can't recall.

22 Q. Okay. And moving to the next --
23 there's another conviction. This one it looks
24 like criminal damage to property. You got 30

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1 **days.**

2 **Do you remember that one, being**
3 **convicted and getting a 30-day sentence? Can't**
4 **recall?**

5 A. No.

6 Q. **Yeah. All right. Let's look at --**
7 **here's one. It's from an arrest of April 7,**
8 **1984.**

9 **And it looks like you were convicted of**
10 **a narcotics offense; is that right?**

11 A. I can't recall.

12 Q. **Well, do you see where it says**
13 **possession, controlled substance, and if you**
14 **read down, it shows you were convicted on**
15 **October 24, 1984.**

16 **Do you see that?**

17 A. Yes.

18 Q. **And you got 18 -- 18 months? Is that**
19 **probation, or you were -- or you went to prison?**

20 A. Probation.

21 Q. **It was probation? Okay.**

22 A. (Indicating.)

23 Q. **Do you remember that arrest?**

24 A. I can't recall it.

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1 Q. Okay. Okay. Let's look -- you've got
2 an arrest from September 17th, 1993. And it
3 would be on page -- of this document, page 12.
4 So it looks like you were arrested on
5 September 17th, 1993, and it was -- it was a
6 residential burglary, and you -- you got four
7 years.

8 Does that sound right?

9 A. I can't recall.

10 Q. January 26th, 1994. Remember we were
11 talking about your first incarceration?

12 A. Yes.

13 Q. Was this -- so it was for a burglary?

14 A. Yes, I guess. Yes.

15 Q. Who -- who did you burgle?

16 A. I can't recall.

17 Q. Did anyone get hurt in the burglary?

18 A. No. Well, I don't know. No.

19 Q. Okay.

20 A. I beat it, so...

21 Q. Well, you got -- you got a four-year
22 sentence.

23 A. Yeah.

24 Q. Well, what do you -- when you say you

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1 **beat it, what do you mean, you beat it?**

2 A. I mean, I don't know. I just -- I
3 apologize.

4 Q. **Okay. All right. That one you didn't**
5 **beat.**

6 **You pled guilty to, right?**

7 A. Right.

8 Q. **Okay. Did you ever get arrested for**
9 **any domestics with your wife?**

10 A. Yeah, a couple.

11 Q. **Yeah. Let's look at -- you got another**
12 **arrest from June 17, 1998. You were convicted**
13 **of another narcotics offense. It looks like on**
14 **that one you -- you received -- was that**
15 **probation? It looks like 18 months, or were**
16 **you -- were you incarcerated in -- it looks like**
17 **this -- you were sentenced on March 24th, 1999.**

18 **Like 18 months?**

19 **Were you in prison for 18 months, or it**
20 **was probation?**

21 A. Probation.

22 MR. BAZAREK: That was probation. Okay.
23 Okay. We can -- we can take -- we can take that
24 down. Let's go to the next exhibit. All right.

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1 So this is DO JOINT 051882 to 883. And this is
2 Exhibit --

3 THE COURT REPORTER: 22.

4 MR. BAZAREK: -- 22.

5 (Whereupon, Young Deposition
6 Exhibit No. 22 was marked for
7 identification.)

8 BY MR. BAZAREK:

9 Q. I just have a question for you, sir.
10 This is an arrest report of an individual named
11 Gregory Haynes. And he was arrested on the same
12 day that you were arrested, March 2nd, 2003.

13 Do you know -- do you know him? Do you
14 know Gregory Haynes?

15 A. No. I heard of him.

16 Q. You heard of him.

17 Does he have a nickname?

18 A. I don't know. No.

19 Q. Was -- was he a drug user?

20 A. I couldn't tell you.

21 Q. Did he ever act as a lookout or -- or
22 solicited drugs for people at Ida B. Wells?

23 A. I couldn't tell you.

24 (Zoom interruption.)

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1 THE COURT REPORTER: Could you repeat that?

2 BY THE WITNESS:

3 A. I couldn't tell you.

4 MR. BAZAREK: Okay. All right. Let's go to
5 the next exhibit, DO JOINT 051884 to 885.

6 THE COURT REPORTER: Number 23.

7 MR. BAZAREK: Yeah.

8 (Whereupon, Young Deposition
9 Exhibit No. 23 was marked for
10 identification.)

11 MS. GIZZI: Which one is -- which Bates stamp
12 is this?

13 MR. BAZAREK: Okay. This is DO JOINT 051884
14 to 88- --

15 MS. GIZZI: Okay.

16 MR. BAZAREK: Yeah. It's his arrest report
17 from --

18 MS. GIZZI: Okay. We're going to -- we're --
19 I'm objecting based off the fact that this was
20 produced 15 minutes before the deposition was
21 set to start.

22 MR. BAZAREK: Okay.

23 MS. GIZZI: Just for the record.

24 MR. BAZAREK: Yeah, yeah. You know what, I

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1 don't have any -- I don't have any questions
2 for -- with that exhibit.

3 So let's go to the next one, DO JOINT
4 051886 to 887. Oh, that's the same. That's the
5 same -- same document.

6 Let me go to 0 -- DO JOINT 051888 to
7 889. Okay. So --

8 THE COURT REPORTER: Do you want to make this
9 24?

10 MR. BAZAREK: Yeah.

11 (Whereupon, Young Deposition
12 Exhibit No. 24 was marked for
13 identification.)

14 BY MR. BAZAREK:

15 Q. So I'm going to ask you, Mr. Young:
16 **There was another individual named Juan Jones**
17 **who was arrested on March 2nd, 2013, at**
18 **Ida B. Wells.**

19 **Do you know anyone named Juan Jones?**

20 A. I can't recall.

21 MR. BAZAREK: Okay. Okay. We can take that
22 one down. Let's look at 051890 to 891.

23 THE COURT REPORTER: Number 25.

24 MR. BAZAREK: Yeah.

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1 (Whereupon, Young Deposition
2 Exhibit No. 25 was marked for
3 identification.)

4 BY MR. BAZAREK:

5 Q. Well, this is the same person. This
6 Juan Jones, it looks like he lived at 5338 South
7 Indiana.

8 Do you remember -- do you remember him
9 at all?

10 A. I can't recall.

11 Q. Okay. And let's look at DO JOINT
12 051954 to 55. What's this? Okay. This is -- I
13 know -- remember --

14 (Whereupon, Young Deposition
15 Exhibit No. 26 was marked for
16 identification.)

17 MS. HARRIS: Sorry, Bill. What was the Bates
18 stamps on that again?

19 MR. BAZAREK: Yeah. It's DO JOINT 051954 to
20 55.

21 BY MR. BAZAREK:

22 Q. So remember -- earlier in the
23 deposition remember we were looking at a picture
24 of you? It was pretty -- not good quality in

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1 **the Sin City pictures. It was a black and**
2 **white.**

3 A. Mm-hmm.

4 Q. **Do you remember that?**

5 A. Yes.

6 Q. **Okay. But this is a picture of you on**
7 **March 2nd, 2003, right?**

8 A. I don't see no picture.

9 MS. HARRIS: Yeah, I'm still -- I can't find
10 it right now. If you give me that Bates stamp
11 one more time. I'm sorry.

12 MR. BAZAREK: Oh, yeah. No problem.

13 It's DO JOINT 051954 to 55.

14 MS. HARRIS: Okay. 051954, I'm not --

15 MR. BAZAREK: Yeah. 051954 to 955.

16 MS. HARRIS: Yeah. That's not popping up.

17 MR. BAZAREK: You know, here. I'm going to
18 send it to you right now. It should be in that
19 link. It was added to the link, so maybe you
20 have to just refresh it.

21 MS. HARRIS: Oh, okay.

22 MS. GIZZI: Same objection then.

23 MR. BAZAREK: Okay.

24 MS. GIZZI: That was produced, like, five

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1 minutes ago.

2 MR. BAZAREK: Well, no. You -- actually,
3 you've had the picture for years. This is a
4 color picture.

5 THE COURT REPORTER: This is number 26.

6 MR. BAZAREK: Okay.

7 So, Dhaviella, I just e-mailed it.

8 MS. HARRIS: Okay. I'm just -- just waiting
9 for it to come through.

10 MR. BAZAREK: Okay.

11 MS. HARRIS: Okay. Just give me one second.
12 I just got it.

13 BY MR. BAZAREK:

14 Q. Okay. And, Mr. Young, are -- you are
15 able to recognize the photograph of you?

16 A. Yes, sir.

17 Q. And it's -- there's a front -- front
18 shot and a side shot.

19 Do you see that?

20 A. Yes, sir.

21 Q. And that's -- that's how you were
22 dressed on March 2nd, 2003, correct?

23 A. Looking good, didn't I?

24 Q. Did -- yeah. Where -- the -- and what

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1 **is that? Is that a cartoon of the person in**
2 **the -- on your sweater?**

3 A. Can't tell.

4 Q. It's got a -- got a guy with dice and
5 cash in his hand.

6 **Do you see that?**

7 A. Mm-hmm.

8 Q. **Is that right?**

9 A. Yeah.

10 Q. **Is -- is -- and that's the sweater you**
11 **were wearing when you worked on the car, right,**
12 **that day?**

13 A. Could it be? I don't know. I can't
14 recall.

15 Q. **Well, did -- did you change -- did you**
16 **ever change clothes that day after you worked on**
17 **the car?**

18 A. I'm quite sure I did.

19 Q. **You did. Okay.**

20 A. You work on a car, you're -- you're
21 greasy and oily, right?

22 Q. **Yeah. And what -- what clothes would**
23 **you wear when you would clean a car?**

24 A. I wouldn't -- I can't tell.

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1 Q. Yeah. Okay. All right. So it's your
2 testimony, though, that when you worked on the
3 car, you wouldn't have worn that blue sweater
4 with the -- with the fella who's got the dice in
5 his hand and cash in the other hand?

6 A. I don't know. I probably would have.

7 Q. Oh, you would have. You would have
8 worn it when you worked on the car?

9 A. Probably would have.

10 MR. BAZAREK: Okay. All right. We can take
11 that down. And let's look at -- let's see.
12 Let's go to the next exhibit. It's -- it's
13 from -- Log 1089231, Attachment 75. It's a
14 document that's from COPA.

15 THE COURT REPORTER: That's number 27?

16 MR. BAZAREK: Yeah.

17 (Whereupon, Young Deposition
18 Exhibit No. 27 was marked for
19 identification.)

20 BY MR. BAZAREK:

21 Q. Okay. Mr. Young, do you remember COPA
22 seeking to interview you on February 15, 2019?
23 Coming to see you?

24 A. I believe so.

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1 **Q. And they wanted to talk to you about**
2 **one of Ben Baker's arrests, right?**

3 A. I believe so.

4 **Q. Okay. And at the time you were living**
5 **at 7527 South Essex Street, right?**

6 A. Yes.

7 **Q. Okay. And what -- they wanted to talk**
8 **to you about Ben Baker's arrest, and then we've**
9 **already gone over Ben Baker's testimony where he**
10 **said that you were selling heroin on that day.**

11 **Do you remember that?**

12 A. Mm-hmm.

13 **Q. Is that right?**

14 A. Yeah.

15 **Q. And then COPA wanted to talk to you**
16 **about that particular arrest of Ben Baker,**
17 **right?**

18 A. Well, I didn't know they was COPA until
19 they told me.

20 **Q. Who did you think they were?**

21 A. My attorney.

22 **Q. Okay. Well, first you thought they**
23 **were for -- working for your attorney. But then**
24 **you learned that they were working for COPA?**

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1 A. Yeah.

2 Q. Okay. But then you told -- you told
3 the investigators from COPA that you were now
4 represented by Joshua Tepfner, right?

5 A. Exactly.

6 Q. Okay. And you told them that
7 Mr. Tepfner instructed you not to talk to anyone
8 about Watts, right?

9 A. Exactly.

10 Q. Okay. So you were following your
11 attorney's advice right?

12 A. Exactly.

13 MR. BAZAREK: Okay. We can -- we can take
14 that down.

15 Okay. Let's go with -- are we now
16 on -- would it be 28?

17 THE COURT REPORTER: Yes.

18 MR. BAZAREK: Okay. Exhibit 28 will be
19 PL JOINT 055249.

20 (Whereupon, Young Deposition
21 Exhibit No. 28 was marked for
22 identification.)

23 BY MR. BAZAREK:

24 Q. And, sir, this is just another document

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1 **from the Illinois Department of Corrections.**

2 **And so it looks like, sir, for -- for the**
3 **March '03 arrest, it looks like you were**
4 **admitted into Stateville on April 28th, 2003.**

5 **Do you see that?**

6 A. Mm-hmm.

7 Q. **Is that right?**

8 A. I believe so.

9 Q. **Okay. And then you were paroled out of**
10 **Vandalia on August 27, 2004.**

11 **Does that sound right?**

12 A. Yes.

13 Q. **Okay. And then it also lists, you**
14 **know, various places that -- where you've been**
15 **in prison.**

16 **So you've been in Big Muddy River; is**
17 **that right?**

18 A. Yeah.

19 Q. **Shawnee, right? You've been to Shawnee**
20 **prison?**

21 A. I -- I guess.

22 Q. **Centralia, East Moline.**

23 **We already talked about Vandalia,**
24 **right?**

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1 A. Mm-hmm.

2 Q. **Is that yes?**

3 A. Yes.

4 MR. BAZAREK: Okay. Let's look at -- the
5 next exhibit will be PL JOINT 067587 to 589.

6 THE COURT REPORTER: It's number 29.

7 MR. BAZAREK: Yeah.

8 (Whereupon, Young Deposition
9 Exhibit No. 29 was marked for
10 identification.)

11 BY MR. BAZAREK:

12 Q. **And, sir, do you recall receiving some
13 type of award from the Court of Claims?**

14 A. Yes, sir.

15 Q. **And was it -- if I look at the -- on
16 this document, page 2, 85,350.**

17 **Is that what you received, or was it
18 more?**

19 A. No.

20 Q. **Oh, you know what? Let's look at the
21 last page. It says you were awarded \$109,782.**

22 A. Yes.

23 Q. **That's what you received.**

24 **Did you use any of that money to buy**

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1 **heroin?**

2 A. No.

3 **Q. What did you do with that money?**

4 A. Never got it.

5 **Q. Where is it?**

6 A. You tell me.

7 **Q. So -- and you were awarded this, it**
8 **looks like, July 20th, 2022?**

9 A. Yes.

10 **Q. And you haven't seen one penny of that**
11 **109,000 dollars and 7 -- or strike that.**

12 **You haven't received one penny of**
13 **the --**

14 A. Yes. I received \$6,000 of that.

15 **Q. Say -- say it again?**

16 A. \$6,000.

17 **Q. Oh, you did receive some of that?**

18 A. Pssh. If that's what you say.

19 **Q. What -- what did you spend the \$6,000**
20 **on?**

21 A. Pardon me?

22 **Q. What did you spend the \$6,000 on?**

23 A. On me and my wife.

24 **Q. Did you use any of the 6,000 to buy**

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1 **heroin?**

2 A. No, to bury her.

3 **Q. Okay. And so it was the burial**
4 **expenses.**

5 **And what year again, sir, did your wife**
6 **pass away?**

7 A. She's been dead over a year now.

8 MR. BAZAREK: Okay. All right. We can take
9 that down.

10 BY THE WITNESS:

11 A. And also my son. They're in the same
12 grave.

13 BY MR. BAZAREK:

14 **Q. Okay. And that's what you used --**
15 **that's what you used the money for?**

16 A. Yes.

17 MR. BAZAREK: Okay. All right. Let's look
18 at the next exhibit. This is PL JOINT 085437 to
19 38.

20 THE COURT REPORTER: Number 30.

21 (Whereupon, Young Deposition
22 Exhibit No. 30 was marked for
23 identification.)

24 BY MR. BAZAREK:

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1 Q. Okay. And this is an affidavit of
2 Gregory Young. And if we can go to the last
3 page, it looks like you signed this on the 10th
4 of October of 2019; is that right?

5 A. Yeah.

6 Q. And you read it before you signed it,
7 right?

8 A. Yeah, I guess.

9 Q. Okay. Now, take a look at paragraph 3.
10 It says -- and this is your affidavit -- "On
11 that date, I saw some of Watts's team in the
12 hallway as I was going to the first floor
13 apartment I shared with my wife in the 527
14 building."

15 Do you see that?

16 A. Mm-hmm.

17 Q. So during this deposition you didn't
18 say anything about seeing police as you were --
19 as you were going into your apartment, right?

20 A. You didn't ask me.

21 Q. Oh. So tell -- okay. Tell -- let's --
22 tell me what happened.

23 A. Ah, I told you I was going in there to
24 give my kids -- um... oh.

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1 Can we take five minutes?

2 MS. GIZZI: Can we take five minutes?

3 BY MR. BAZAREK:

4 **Q. Do you need a brief break, sir?**

5 A. Yes.

6 MR. BAZAREK: We can take a break.

7 THE VIDEOGRAPHER: We're going off the record
8 at 4:04 p.m.

9 MR. BORKAN: You don't get a break during the
10 pendency of a question.

11 THE VIDEOGRAPHER: Sorry.

12 THE COURT REPORTER: Sorry. Who was that?

13 MR. BORKAN: Borkan.

14 Bill?

15 MR. BAZAREK: I thought he -- I thought he
16 answered the question.

17 MR. BORKAN: He didn't answer the question.

18 MR. BAZAREK: I thought he answered it.

19 MR. BORKAN: I don't think he did.

20 Ms. Court Reporter, can you read it
21 back? Maybe I'm mistaken.

22 MS. GIZZI: Steve, it's not your question
23 anyway. So you don't have a basis.

24 MR. BORKAN: Oh, well, yes, I do. I

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1 certainly do have a basis to raise it with
2 Mr. Bazarek.

3 MR. BAZAREK: All right. Well, let's --
4 let's get the question and see if there was an
5 answer.

6 MR. BORKAN: That's all I'm asking. If there
7 was an answer, then go ahead and take your
8 break.

9 (Whereupon, the record was read
10 as requested.)

11 BY MR. BAZAREK:

12 Q. Were you done with your answer, sir?

13 A. Yes.

14 MR. BAZAREK: Okay. Let's take a break.

15 THE VIDEOGRAPHER: We're going off the record
16 at 4:06 p.m.

19 THE VIDEOGRAPHER: This is the beginning of
20 Media Unit 4, and we are back on the record at
21 4:19 p.m.

22 MS. GIZZI: This is Gianna Gizzi on behalf of
23 Gregory Young, counsel for the plaintiff and
24 deponent.

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1 For the record, Mr. Young is not
2 feeling well and is unable to continue answering
3 questions at this time. So we're going to
4 continue his deposition to another day --
5 another date that the parties agree on.

6 MR. BAZAREK: Yeah. Could we -- could we --
7 can we agree now to do it next week?

8 MS. GIZZI: Yes. Yeah. We can agree on
9 that.

10 Do you want to pick a date right now on
11 the record?

12 MR. BAZAREK: I don't know. Is -- I'll talk
13 to fellow defense counsel.

14 Do we want to pick a day now or just
15 pick it after we adjourn, but it will be some
16 time for next week?

17 MR. BORKAN: That would be fine. And I would
18 like to inquire -- I don't know that I'm going
19 to get an answer, Counsel, but I'd like to
20 inquire as to the nature of the illness.
21 Because before we broke, it did not appear that
22 there was anything that was out of the ordinary
23 with Mr. Young other than how he had looked
24 throughout the entire day since we started at

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1 about 10:15 this morning.

2 So it -- I -- I understand that you
3 might not otherwise be required to provide that
4 information other than perhaps what the nature
5 of the illness is, but -- I'm not asking what
6 exactly the diagnosis is.

7 But what seems to be the problem?

8 MS. GIZZI: Good. I'm glad you're not asking
9 that, because I don't know, and I'm not a doctor
10 or have any type of specialty or knowledge in
11 that capacity. But we -- I'm not going to get
12 on to that on the record.

13 MR. BORKAN: No. I --

14 MS. GIZZI: If you want --

15 MR. BORKAN: No, no. I absolutely want this
16 on the record. And that is, so you're -- you
17 are stating that Mr. Young has advised you that
18 he cannot continue because he's ill?

19 MS. GIZZI: Yes. Is there something you
20 don't understand about that?

21 MR. BORKAN: I'm sorry. What?

22 MS. GIZZI: Is there something you don't
23 understand about that?

24 MR. BORKAN: Yeah. There is something that I

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1 don't understand about it, because unless
2 somebody can tell me otherwise, and unless
3 somebody is going to tell me there's something
4 different, I have watched Mr. Young since we
5 start -- since he got on this video, which is
6 shortly after 10:00 a.m., and until literally
7 less than ten minutes ago, and there wasn't
8 anything that appeared differently about him.

9 And then -- and there was a series of
10 questions by Mr. Bazarek, one of which I did not
11 believe was answered -- and I'll review the
12 video -- but I thought your client was going to
13 continue speaking and then wanted a break. And
14 then he's now saying that he's ill.

15 I'm not saying that he's not. I'm just
16 saying that, yes, I did have a number of
17 questions about that. That's why I asked you
18 for the nature of what it was. And you said
19 since you're a doctor [sic] you can't tell me
20 other than your client said he can't continue
21 and he's ill. And so that's -- as long as
22 that's on the record, and it's understood, we'll
23 go from there.

24 MS. GIZZI: Sounds good.

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1 MR. PALLE: I just simply want to say --
2 tell you specifically, Bill and Gianna, that
3 Thursday the 22nd I have a biopsy in the
4 morning. So I couldn't possibly -- if Thursday
5 was the day, I couldn't possibly start before
6 the afternoon. So plan accordingly.

7 MR. BAZAREK: I'd -- well, yeah. I'd be --
8 I'd be fine with -- I mean, we can do it right
9 now. I'd be fine -- if you're up to it, I'd be
10 fine with Thursday afternoon anytime.

11 I mean, I don't know how much time we
12 have on the -- what -- how much time do we have
13 on the record right now?

14 THE VIDEOGRAPHER: One second.

15 MR. BAZAREK: Thanks.

16 THE VIDEOGRAPHER: Yeah. We have 4 hours and
17 37 minutes on the record.

18 MR. BAZAREK: Oh. So we have plenty of time
19 still in this deposition. The only thing I -- I
20 would have done -- I know we talked about Nicole
21 on the -- on the Gibson case for Friday. That
22 would be another option. But I'm fine with
23 doing it on -- Eric, if you're fine with doing
24 it on Thursday afternoon like at 1:00, I would,

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1 or we'll do it a different day. I don't care.

2 MR. PALLE: Yeah. I'd prefer a different
3 day, but I can do it, I assume, by 1:00.

4 MR. BAZAREK: No, no. The -- let's -- why
5 don't we do it -- we should just pick a day to
6 get this done. Why don't we just do it on the
7 Wednesday, the 21st. Would that work?

8 MR. PALLE: Well, that's when we have Calvin
9 Ridgell.

10 MR. BAZAREK: Oh, okay. Sorry.

11 MR. BORKAN: No, no. That's fine. Do you
12 want to continue Calvin --

13 MR. BAZAREK: What if we do it --

14 MR. BORKAN: -- Counsel?

15 MR. BAZAREK: What if we do it on Friday?

16 Like Friday at -- when -- when was the Gibson?

17 MS. GIZZI: Nicole's was -- Nicole's was
18 Friday, and I -- I confirmed with her, so -- I
19 mean, we could double up.

20 MR. BAZAREK: Well, that's what I was
21 thinking. We could -- you know, we
22 could dou- -- we can just double up.

23 MS. GIZZI: I'm fine with that.

24 (Simultaneous speakers.)

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1 MR. BAZAREK: Do you want -- do you guys
2 want -- I don't want to push --

3 MR. PALLES: Yeah. I don't want to double
4 up. I'd rather -- I'd rather take a shot on
5 that -- that Thursday afternoon.

6 MR. BAZAREK: Let's do Thursday --

7 MR. PALLES: I don't think I'll be --

8 MR. BAZAREK: Yeah.

9 MR. PALLES: -- tied up the whole day.

10 MR. BAZAREK: Okay. Do we want to do --
11 we'll do -- we'll start at Thursday at 2:00 --
12 we can do 1:00 or 2:00.

13 MR. PALLES: So make it --

14 MR. BAZAREK: 2:00. Let's do it Thursday --

15 MR. PALLES: Okay.

16 MR. BAZAREK: All right. By agreement of all
17 the parties, we're going to continue this
18 deposition because of plaintiff's reported
19 illness, and we will reconvene at 2:00 p.m. on
20 February 22nd.

21 MR. PALLES: Yep.

22 MR. BAZAREK: Okay.

23 THE VIDEOGRAPHER: All right.

24 MR. PALLES: Thank you all. Have a good

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1 weekend.

2 THE VIDEOGRAPHER: I can take us off the
3 video record now.

4 MR. BAZAREK: Thank you.

5 THE VIDEOGRAPHER: This concludes today's
6 proceeding in the deposition of Gregory Young.
7 The time is 4:25 p.m., and we are now off the
8 record.

9 (Deposition concluded at
10 4:25 p.m.)

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4 In re: WATTS COORDINATED)
5 PRETRIAL PROCEEDINGS) Case No. 19 cv 1717)

7 I, GREGORY YOUNG, being first duly sworn,
8 on oath say that I am the deponent in the
9 aforesaid deposition taken on February 16, 2024;
10 that I have read the foregoing transcript of my
11 deposition, and affix my signature to same.

GREGORY YOUNG

20 Subscribed and sworn to
21 before me this _____ day
22 of , 2024

24 | Notary Public

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4

5 I, Kari Wiedenhaupt, Certified Shorthand
6 Reporter, do hereby certify that on
7 February 16, 2024, the deposition of the
8 witness, GREGORY YOUNG, called by the Defendant,
9 was taken before me via videoconference,
0 reported stenographically, and was thereafter
1 reduced to typewriting under my direction.

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

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

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

24 The signature of the witness, GREGORY

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1 YOUNG, was reserved by agreement of counsel.

2 The undersigned is not interested in the
3 within case, nor of kin or counsel to any of the
4 parties.

5 Witness my official signature as a
6 Certified Shorthand Reporter in the State of
7 Illinois on April 3, 2024.

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14 Kari Wiedenhaupt, CSR
15 161 North Clark Street
16 Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851



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CSR No. 084-003582