

Exhibit 17



Transcript of the Deposition of
Harvey Blair

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: November 1, 2022

Royal Reporting Services, Inc.
Phone: 312.361.8851
Email: info@royalreportingservices.com
Website: www.royalreportingservices.com

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 1

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

In re: WATTS COORDINATED)	Case No. 19-cv-01717
PRETRIAL PROCEEDINGS)	
)	

The videotaped deposition of HARVEY BLAIR,
called as a witness for examination, taken
before Michelle M. Yohler, Certified Shorthand
Reporter for the State of Illinois, CSR No. 84-4531,
appearing via videoconference in Will County,
Illinois, on November 1, 2022, at 10:04 a.m.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 2

1 REMOTE APPEARANCES:
2 LOEVY & LOEVY
3 BY: MS. ELIZABETH M. PAUKSTIS
4 (311 North Aberdeen, 3rd Floor
5 Chicago, Illinois 60607
6 312.243.5900
7 paukstis@loevy.com)
8 -AND-
9 LAW OFFICES OF KENNETH N. FLAXMAN, P.C.
10 BY: MR. JOEL A. FLAXMAN
11 MR. COLLIN J. GILL
12 (200 South Michigan Avenue, Suite 201
13 Chicago, Illinois 60604
14 312.427.3200
15 jaf@kenlaw.com
16 cjg@kenlaw.com)
17 Appeared on behalf of Coordinated
18 Plaintiffs;
19 HALE & MONICO
20 BY: MS. ALLYSON L. WEST
21 (53 West Jackson Boulevard, Suite 337
22 Chicago, Illinois, 60604
23 312.341.9646
24 awest@halemonico.com)
Appeared on behalf of Individual
Defendants;
JOHNSON & BELL, LTD.
BY: MR. AHMED A. KOSOKO
(33 West Monroe Street, Suite 2700
Chicago, Illinois 60603
312.372.0770
kosokoa@jbltd.com)
Appeared on behalf of Defendant
Ronald Watts;
DALEY MOHAN GROBLE, P.C.
BY: MR. ERIC S. PALLES
(55 West Monroe Street, Suite 1600
Chicago, Illinois 60603
312.422.9999
epalles@daleymohan.com)
Appeared on behalf of Defendant
Kallatt Mohammed;

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 3

1 REMOTE APPEARANCES (Continued):

2 REITER BURNS

3 BY: MS. DHAVIELLA N. HARRIS

4 (311 South Wacker Drive, Suite 5200

Chicago, Illinois 60606

312.982.0090

dharris@reiterburns.com)

5 Appeared on behalf of Defendant City
6 of Chicago;

7 LEINENWEBER BARONI & DAFFADA, LLC

8 BY: MS. MEGAN K. McGRATH

9 (120 North LaSalle Street, Suite 2000

Chicago, Illinois 60602

866.786.3705

mkm@ilesq.com)

10 Appeared on behalf of Defendants
11 Cadman and Spaargaren;

12 ALSO PRESENT:

13 Mr. Scot Ziarko, Videographer

14

15

16

17

18

19

20

21

22

23

24 REPORTED BY:

MICHELLE M. YOHLER, CSR, RMR, CRR

Illinois CSR No. 84-4531.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 4

1 E X A M I N A T I O N S

2

3 WITNESS PAGE

4 HARVEY BLAIR

5 By Ms. West..... 7

6 By Mr. Palles..... 126

7 By Mr. Kosoko..... 156

8 By Ms. Harris..... 271

9 By Mr. Kosoko..... 273

10 By Mr. Palles..... 275

11 By Ms. West..... 279

12

13

14

15 E X H I B I T S

16 INDIVIDUAL DEFENDANTS EXHIBITS PAGE

17 No. 1 Mug Shots..... 84

18 No. 2 Plaintiff Harvey Blair's

19 Answers to April 14, 2020

20 Interrogatories..... 111

21 No. 3 Affidavit of Harvey Blair..... 116

22

23

24 (Continued)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 5

1	E X H I B I T S		
2	WATTS EXHIBITS (retained by counsel)		PAGE
3	No. 1	Preliminary Hearing Transcript....	215
4	No. 2	Transcript.....	240
5	No. 3	Copy of Check.....	264
6	No. 4	Letter.....	265
7	No. 5	Inventory Report.....	267
8	No. 6	(no description).....	270
9			
10	MOHAMMED EXHIBITS		PAGE
11	No. 1	Photos.....	143
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 6</p> <p>1 THE VIDEOGRAPHER: Good morning. This is 2 the start of Media Number 1 in the video 3 deposition of Harvey Blair in the matter of 4 In Re: Watts Coordinated Pretrial Proceedings, 5 Case 19 CV 1717. 6 This deposition is being held via 7 Zoom meetings on November 1, 2022. The time is 8 now approximately 10:04 a.m. 9 My name is Scot Ziarko. I'm the 10 legal video specialist with Video Instanter 11 located at 134 North LaSalle Street, Suite 1400, 12 Chicago, Illinois. 13 The court reporter today is Michelle 14 Yohler, who is with Royal Reporting. 15 Will counsel please identify 16 yourselves for the record. 17 And will the court reporter please 18 swear in the witness. 19 MR. PALLES: Eric Palles for Kallatt 20 Mohammed. 21 MS. WEST: Allyson West on behalf of the 22 individual defendant officers. 23 MS. PAUKSTIS: Elizabeth Paukstis on behalf 24 of Loevy & Loevy, plaintiffs.</p>	<p style="text-align: right;">Page 8</p> <p>1 could hear you and she can take down everything 2 you're saying, that would be great. 3 A. Okay. 4 Q. Also, if at any point you need to 5 take a break, sir, just let me know. All I ask 6 is that you finish answering the question that's 7 pending before we take that break. 8 Do you understand? 9 A. I do. I understand. 10 Q. If at any point you don't understand 11 my question, sir, please let me know. I'll try 12 my best to repeat it or rephrase it until you do 13 understand the question. 14 Does that sound fair? 15 A. That's fair. 16 Q. Mr. Blair, is there anything that 17 prevents you from testifying truthfully today? 18 A. No. 19 Q. Okay. Are you under the influence of 20 any drugs, medication, or alcohol that would 21 impair your ability to testify truthfully today? 22 A. No. 23 Q. Okay. Sir, where are you located? 24 A. I'm located at my lawyer's office.</p>
<p style="text-align: right;">Page 7</p> <p>1 MS. HARRIS: Dhaviella Harris on behalf of 2 the City. 3 MR. FLAXMAN: Joel Flaxman for the witness. 4 Collin Gill from my office is also present on 5 Zoom. 6 MS. McGRATH: Megan McGrath for defendants 7 Cadman and Spaargaren. 8 MR. KOSOKO: Ahmed Kosoko on behalf of 9 Ronald Watts. 10 (WHEREUPON, the witness was duly sworn.) 11 HARVEY BLAIR, 12 called as a witness herein, having been first 13 duly sworn, was examined and testified via 14 videoconference as follows: 15 EXAMINATION 16 BY MS. WEST: 17 Q. Good morning, Mr. Blair. Like I said 18 earlier, my name is Allyson West. I represent 19 individual defendant officers in the lawsuit 20 that you've brought. I'm going to ask you some 21 questions, as well as some of the other 22 attorneys. 23 But like the court reporter just 24 said, if you could keep your voice up so that we</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Okay. Other than Mr. Flaxman, is 2 there anyone present in the room with you? 3 A. Yes, Collin. 4 Q. Mr. Gill? 5 MR. FLAXMAN: Yes. 6 BY THE WITNESS: 7 A. Yes. 8 BY MS. WEST: 9 Q. And, sir, is there a computer screen 10 up in front of you? 11 A. Yes. 12 Q. Okay. Is there anything on that 13 screen other than the Zoom platform? 14 A. No. 15 Q. Mr. Blair, did you meet with your 16 counsel in preparation for your deposition? 17 A. Yes. 18 Q. Okay. How many times did you meet 19 with your attorney in preparation for today? 20 A. Twice. 21 Q. When was the most recent time? 22 A. Yesterday. 23 Q. How long did that meeting take 24 place -- or, I'm sorry.</p>

6 (Pages 6 to 9)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 10	Page 12
<p>1 How long was that meeting?</p> <p>2 A. Approximately an hour and a half.</p> <p>3 Q. Okay. During that meeting with your</p> <p>4 counsel, was anyone present other than</p> <p>5 Mr. Flaxman?</p> <p>6 A. Yes, Mr. Collin.</p> <p>7 Q. Anyone else?</p> <p>8 A. No, ma'am.</p> <p>9 Q. Okay. And during that meeting, did</p> <p>10 you review any documents?</p> <p>11 A. Yes.</p> <p>12 Q. What documents did you review?</p> <p>13 A. Some interrogatory documents.</p> <p>14 Q. Anything --</p> <p>15 A. That was -- I think that was about</p> <p>16 it.</p> <p>17 Q. Okay. Did you review any police</p> <p>18 reports?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. What police reports did you</p> <p>21 review?</p> <p>22 A. The re- -- the police report that</p> <p>23 Officer Jones and I forget the other officer,</p> <p>24 the ones that they signed.</p>	<p>1 Q. Did you review an affidavit?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Did you review an affidavit</p> <p>4 that you yourself signed off on?</p> <p>5 A. Yes.</p> <p>6 Q. Did you review an affidavit of anyone</p> <p>7 else?</p> <p>8 A. No, ma'am.</p> <p>9 Q. What was the first time that you met</p> <p>10 with your attorney in preparation for your</p> <p>11 deposition today?</p> <p>12 A. Last -- last week. I think that was</p> <p>13 it. The 24th or the 25th, I think, yeah.</p> <p>14 Q. And on that meeting -- or during that</p> <p>15 meeting on the 24th or 25th, who was present?</p> <p>16 A. Mr. Flaxman and -- and Collin.</p> <p>17 Q. Did you review any additional</p> <p>18 documents other than the documents that we've</p> <p>19 already gone over during that first meeting with</p> <p>20 your counsel?</p> <p>21 A. No.</p> <p>22 Q. Mr. Blair, what's your full name?</p> <p>23 A. Harvey William Blair, III.</p> <p>24 Q. And what's your date of birth?</p>
Page 11	Page 13
<p>1 Q. Okay. Police reports related to your</p> <p>2 2004 arrest?</p> <p>3 A. Yes.</p> <p>4 MR. FLAXMAN: Can you turn it off? We're</p> <p>5 just going to make sure his phone is off.</p> <p>6 MS. WEST: Sure.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Okay. Sorry about that.</p> <p>9 BY MS. WEST:</p> <p>10 Q. No worries.</p> <p>11 Did you review any transcripts?</p> <p>12 A. No.</p> <p>13 Q. Okay. Did you review any photographs</p> <p>14 of police officers?</p> <p>15 A. No.</p> <p>16 Q. Did you review any photographs of the</p> <p>17 540 Building where the arrest took place?</p> <p>18 A. Yes.</p> <p>19 Q. Did you review any other documents,</p> <p>20 sir?</p> <p>21 A. No, I don't believe so.</p> <p>22 Q. Did you review your complaint in this</p> <p>23 case?</p> <p>24 A. Yes.</p>	<p>1 A. 9/18/68.</p> <p>2 Q. And, sir, have you ever gone by any</p> <p>3 other name other than Harvey Blair?</p> <p>4 A. No.</p> <p>5 Q. Do you have a nickname?</p> <p>6 A. Yes.</p> <p>7 Q. What's your nickname?</p> <p>8 A. HBO.</p> <p>9 Q. And who gave you that nickname?</p> <p>10 A. Friends while I was growing up.</p> <p>11 Q. And how did that nickname come about?</p> <p>12 A. Actually, they took it from my --</p> <p>13 my -- the initials from my first and last name.</p> <p>14 Q. Okay. Mr. Blair, is your mother</p> <p>15 still living?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Is she still in the City of Chicago?</p> <p>18 A. Yes, ma'am.</p> <p>19 Q. Are you currently still living with</p> <p>20 your mother?</p> <p>21 A. Yes, I do.</p> <p>22 Q. Are you currently married, sir?</p> <p>23 A. No.</p> <p>24 Q. Have you ever been married?</p>

7 (Pages 10 to 13)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 14

1 A. Yes.
2 **Q. And did that marriage end in divorce,**
3 **sir?**
4 A. Yes.
5 **Q. When were you divorced?**
6 MR. FLAXMAN: Don't look at me. Answer --
7 BY THE WITNESS:
8 A. 2000- --
9 MR. FLAXMAN: -- the question.
10 BY THE WITNESS:
11 A. 2001, I think.
12 BY MS. WEST:
13 **Q. And, Mr. Blair, just so you know, I'm**
14 **not trying -- trying to trick you on any of**
15 **these things. So if you don't recall, perfectly**
16 **fine to tell me that.**
17 A. Okay.
18 **Q. What was your spouse's name that you**
19 **were divorced from in approximately 2001?**
20 A. My spouse's name is Pamela Webb.
21 **Q. Did you have any children with**
22 **Pamela?**
23 A. Yes, I do.
24 **Q. How many children?**

Page 15

1 A. Two.
2 **Q. And how old are your children?**
3 A. 30- -- one of them is...
4 THE WITNESS: (Inaudible.)
5 MS. REPORTER: Mr. Blair, when you lean to
6 the side, I can't hear you.
7 THE WITNESS: Oh, okay. I'm sorry.
8 MR. FLAXMAN: You have to give the year
9 first.
10 BY THE WITNESS:
11 A. Okay. My daughter was born 4/11/89,
12 and my son was born 12/14/93.
13 BY MS. WEST:
14 **Q. Thank you. Do both your son and**
15 **daughter reside in the Chicagoland area?**
16 A. No.
17 **Q. Where do they live?**
18 A. They live in Minneapolis.
19 **Q. Both of them?**
20 A. Yes.
21 **Q. Does Pamela reside in Minneapolis as**
22 **well?**
23 A. Yes, she does.
24 **Q. Have you -- I'm sorry. Did you say**

Page 16

1 **something, sir?**
2 A. No, no, I didn't.
3 **Q. Have you ever -- strike that.**
4 **Do you have any other children?**
5 A. No.
6 **Q. Have you ever lived in the same**
7 **household with your daughter and your son?**
8 A. Yes.
9 **Q. Okay. When did you live with your**
10 **children?**
11 A. I lived with them when they were
12 first born up until the year 2000.
13 **Q. So if your daughter was born in 1989,**
14 **you lived with both your daughter and your son**
15 **for approximately 10 or 11 years; is that**
16 **correct?**
17 A. Yes.
18 **Q. And when you lived with them, where**
19 **did you live?**
20 A. We lived in Minneapolis, Minnesota.
21 **Q. During the time period in which you**
22 **lived with your children, did you also live with**
23 **Pamela?**
24 A. Yes.

Page 17

1 **Q. How long were you married to Pamela?**
2 A. Approximately ten years.
3 **Q. What year, sir, did you live in**
4 **Minneapolis?**
5 A. I lived in Minneapolis from '92 until
6 2000 -- 2000. Yeah, from, like, '92 to 2000.
7 And then we got back together for a little
8 while. So maybe from '92 to, like, 2001.
9 **Q. Okay. And in 2001, did you move back**
10 **to Chicago?**
11 A. Yes.
12 **Q. When you returned to Chicago, did**
13 **your children ever live with you again?**
14 A. For a little while --
15 **Q. When was this?**
16 A. Maybe, like, 2003. Maybe, like,
17 2003. But it wasn't for a long period of time.
18 It was just for, like, a few months.
19 **Q. And why did they come live with you**
20 **for only a few months, sir?**
21 A. Actually, they just -- they really
22 came because they stayed with me for the summer.
23 **Q. And I'm sorry. What year did you say**
24 **that was?**

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 18	Page 20
<p>1 A. I believe it was 2003.</p> <p>2 Q. At any point have you paid child</p> <p>3 support for either your son or your daughter?</p> <p>4 A. No.</p> <p>5 Q. Were you ever ordered by a court to</p> <p>6 pay child support for your children?</p> <p>7 A. No.</p> <p>8 Q. Mr. Blair, where do you currently</p> <p>9 reside?</p> <p>10 A. My address is 3610 South Rhodes,</p> <p>11 Chicago, Illinois 60653.</p> <p>12 Q. And you previously testified that you</p> <p>13 live there with your mother, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Does anyone else live in the home</p> <p>16 with you?</p> <p>17 A. No.</p> <p>18 Q. How long have you lived at that</p> <p>19 address?</p> <p>20 A. Well, outside of living in</p> <p>21 Minneapolis, I was -- I've lived at that address</p> <p>22 since I was seven years old.</p> <p>23 Q. Prior to living in the -- 3610 South</p> <p>24 Rhodes, where did you live? Have you always</p>	<p>1 2004, one of my uncles, and 2006.</p> <p>2 Q. What are your uncles' names?</p> <p>3 A. One of -- the first one is Louis</p> <p>4 Barry. The second one's name is Gary Barry.</p> <p>5 Q. And, sir, are both deceased?</p> <p>6 A. Yes.</p> <p>7 Q. Now, the 3610 South Rhodes address,</p> <p>8 is that located across the street from what was</p> <p>9 the former Ida B. Wells housing complex?</p> <p>10 A. Yes.</p> <p>11 Q. What's your highest level of</p> <p>12 education, sir?</p> <p>13 A. Well, 12 -- grade 12, and I also went</p> <p>14 to school for -- to be a nursing assistant --</p> <p>15 Q. And -- sorry, go ahead.</p> <p>16 A. Yeah, that's about it. That's it.</p> <p>17 Q. Did you graduate from high school?</p> <p>18 A. Yes.</p> <p>19 Q. What school did you graduate from?</p> <p>20 A. Hyde Park Career Academy.</p> <p>21 Q. And what year did you graduate?</p> <p>22 A. 1986.</p> <p>23 Q. And when did you attend school to</p> <p>24 obtain -- did you say it was a nursing --</p>
Page 19	Page 21
<p>1 been from the Chicagoland area?</p> <p>2 A. Only except for when I lived in</p> <p>3 Minneapolis --</p> <p>4 Q. Okay.</p> <p>5 A. -- but, yeah, I've always resided at</p> <p>6 that address.</p> <p>7 Q. And so that location, is it a house</p> <p>8 or an apartment?</p> <p>9 A. It's a -- it's a townhouse.</p> <p>10 Q. A townhouse.</p> <p>11 A. Mm-hm.</p> <p>12 Q. Okay. Has anyone else other than</p> <p>13 your mother ever lived with you at the</p> <p>14 3610 South Rhodes address?</p> <p>15 A. Yes, two of my mother's brothers.</p> <p>16 Q. I'm sorry. Say that one more time.</p> <p>17 A. I said two of my mother's brothers,</p> <p>18 two of my uncles. They lived at -- with me</p> <p>19 at -- lived at that address with us at -- before</p> <p>20 they were deceased.</p> <p>21 Q. Do you recall what time period that</p> <p>22 was that they lived with you and your mother at</p> <p>23 the 3610 South Rhodes address?</p> <p>24 A. I want to say, like, 2004 they was --</p>	<p>1 A. Yes.</p> <p>2 Q. -- certificate?</p> <p>3 A. Mm-hm. Oh, wow. I can't remember</p> <p>4 offhand. I would have to look at my</p> <p>5 certificate.</p> <p>6 Q. Okay. And did you obtain a</p> <p>7 certificate, sir?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. And where did you attend</p> <p>10 school for that?</p> <p>11 A. This place called PTC Career</p> <p>12 Institute.</p> <p>13 Q. And did you ever work in a capacity</p> <p>14 as a nurse?</p> <p>15 A. As a nursing assistant, yes.</p> <p>16 Q. Okay. So you were a CNA?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. What years did you work as a</p> <p>19 CNA?</p> <p>20 A. '93 -- '90- -- '93 to, like, '94,</p> <p>21 something like that, I think.</p> <p>22 Q. And where did you work in 1993 as a</p> <p>23 CNA?</p> <p>24 A. I can't remember the name of the</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 22

1 place. It was in some -- it was a nursing home
2 in Cicero, but I -- I can't remember the -- what
3 the name of the place was.
4 **Q. And you were at that job for about a**
5 **year?**
6 A. Yeah.
7 **Q. Okay. And why did you leave that**
8 **job?**
9 A. Because we were moving to Minnesota.
10 **Q. Other than from 1993 to 1994,**
11 **approximately, have you ever worked as a CNA any**
12 **other time period?**
13 A. No.
14 **Q. Do you hold any other certificates or**
15 **higher degrees, sir?**
16 A. No.
17 **Q. Mr. Blair, have you ever been in a**
18 **gang?**
19 A. Yes.
20 **Q. What gang were you a part of?**
21 A. A Traveler Vice Lord.
22 **Q. And when did you become a member of**
23 **the Traveling Vice Lords?**
24 A. Maybe 1985, somewhere like that.

Page 23

1 About 1985 when I was a teenager, real young.
2 **Q. Were you still in high school at the**
3 **time that you became a member of the Traveling**
4 **Vice Lords?**
5 A. Yes.
6 **Q. Okay. And are you still affiliated**
7 **with the Traveling Vice Lords?**
8 A. No.
9 **Q. Okay. When was the last time you**
10 **were affiliated with the Traveling Vice Lords?**
11 A. 2000, maybe -- 2006. 2006, I think.
12 **Q. And, Mr. Blair, why did you become a**
13 **member of the Traveling Vice Lords?**
14 A. Well, at the time, I thought it was
15 just a cool thing to do.
16 **Q. And when you stopped affiliating with**
17 **the Traveling Vice Lords, why was that?**
18 A. I was -- because I became a -- I had
19 to take care of my family, and that wasn't a
20 part of my life anymore.
21 THE VIDEOGRAPHER: Mr. Blair, can you keep
22 yourself centered, please.
23 THE WITNESS: Yes.
24 THE VIDEOGRAPHER: Thank you.

Page 24

1 BY MS. WEST:
2 **Q. Did you ever obtain a rank?**
3 A. No.
4 **Q. During the time period in which you**
5 **associated with the Traveling Vice Lords, were**
6 **there a lot of individuals in your neighborhood**
7 **that were also a part of the Traveling Vice**
8 **Lords?**
9 A. No.
10 **Q. Was there a particular gang in the**
11 **area in which you lived?**
12 A. Yes.
13 **Q. And what gang was that?**
14 A. The Gangster Disciples.
15 **Q. Mr. Blair, are you currently**
16 **employed?**
17 A. No.
18 **Q. When was the last time you were**
19 **employed, sir?**
20 A. Actually, I -- I work for myself.
21 I'm a -- I -- I'm a barber. I cut hair, so I
22 work for myself.
23 **Q. Okay. So you're currently**
24 **self-employed?**

Page 25

1 A. Yes.
2 **Q. And how long have you been**
3 **self-employed?**
4 A. Maybe 2005, I think, somewhere around
5 there, something like that. Like, 2005, I
6 started cutting hair.
7 I was working in a barbershop, so --
8 but me and the guy that owned the barbershop
9 couldn't -- couldn't agree on what you would
10 call booths rent. So I started cutting hair out
11 my house.
12 **Q. And when did you start cutting hair**
13 **out of your house?**
14 A. Between 2005/2006, somewhere up in
15 there.
16 **Q. And since then, have you continued to**
17 **cut hair out of your house, or did you --**
18 **have --**
19 A. Yes.
20 **Q. -- you gone back to a shop?**
21 MR. FLAXMAN: Make sure you let her finish
22 the question.
23 THE WITNESS: Oh, okay.
24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 26	<p>1 BY MS. WEST:</p> <p>2 Q. So prior to 2005, when you worked at</p> <p>3 a barbershop, what was the name of the</p> <p>4 barbershop you worked at?</p> <p>5 A. I can't remember.</p> <p>6 Q. How long did you work at that</p> <p>7 barbershop?</p> <p>8 A. About, approximately, three or four</p> <p>9 months.</p> <p>10 Q. So prior to 2005, sir, where did you</p> <p>11 work?</p> <p>12 A. I worked in -- well, I was -- while I</p> <p>13 was living in Minnesota, I worked at, like,</p> <p>14 a lot of restaurants: Olive Garden,</p> <p>15 Fuddruckers, Cracker Barrel. I don't know. I</p> <p>16 just worked at a lot of restaurants before I</p> <p>17 moved back to Chicago.</p> <p>18 Q. Okay. And this was during that</p> <p>19 ten-year period when you were in Minneapolis,</p> <p>20 sir?</p> <p>21 A. Yes.</p> <p>22 Q. Were you continuously employed the</p> <p>23 entire time, the entire ten years, you were in</p> <p>24 Minneapolis?</p>	Page 28	<p>1 place?</p> <p>2 A. Maybe a year and a half.</p> <p>3 Q. Was it located in Chicago?</p> <p>4 A. Yes.</p> <p>5 Q. And why did you leave that place,</p> <p>6 sir?</p> <p>7 A. Oh, because I went -- I went back to</p> <p>8 Minnesota.</p> <p>9 Q. When did you go back to Minnesota,</p> <p>10 sir?</p> <p>11 A. Around 2001.</p> <p>12 Q. And when you returned in 2001, how</p> <p>13 long did you stay in Minneapolis that time?</p> <p>14 A. Not long. Probably a year. Maybe a</p> <p>15 year or a little over a year.</p> <p>16 Q. Okay. During that year that you</p> <p>17 returned to Minneapolis, were you employed?</p> <p>18 A. Yes.</p> <p>19 Q. Where did you work?</p> <p>20 A. I worked at a White Castle. I think</p> <p>21 that -- yeah, that was, like, the last place I</p> <p>22 worked in Minnesota. It was White Castle.</p> <p>23 Q. Okay. And then did you return to</p> <p>24 Chicago in approximately 2002?</p>
Page 27	<p>1 A. Yes.</p> <p>2 Q. Okay. Sorry, back to your</p> <p>3 self-employment currently, how -- how many</p> <p>4 clients do you have currently, sir?</p> <p>5 A. Currently, right now?</p> <p>6 Q. Yes.</p> <p>7 A. Oh, about 20. A good 20, 25 clients.</p> <p>8 Q. Okay. And those are regular clients,</p> <p>9 sir?</p> <p>10 A. Yes.</p> <p>11 Q. Prior to your moving to Minneapolis,</p> <p>12 were you ever employed anywhere else in the</p> <p>13 Chicagoland area other than when you worked at</p> <p>14 the nursing facility?</p> <p>15 A. I was, but I can't remember the name</p> <p>16 of the place. It was -- it was, like, a place</p> <p>17 for, like, young kids that were -- that, you</p> <p>18 know, got in trouble at school a lot or they</p> <p>19 didn't get along with their family. It was --</p> <p>20 it was -- it was, like, a home for, you know,</p> <p>21 disadvantaged kids. But I -- I can't remember</p> <p>22 the name of -- of the home -- name of the home</p> <p>23 it was. But I worked there for a little while.</p> <p>24 Q. How long did you work at that -- that</p>	Page 29	<p>1 A. 2- -- yes.</p> <p>2 Q. Okay. And you've remained in Chicago</p> <p>3 since 2002, sir?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Okay. In July of 2004, were you</p> <p>6 working?</p> <p>7 A. No.</p> <p>8 Q. Okay. From the time that you</p> <p>9 returned in 2002 until your arrest in July</p> <p>10 of 2004, were you employed anywhere?</p> <p>11 A. No.</p> <p>12 Q. Were you looking for employment</p> <p>13 during that approximately two-year period, sir?</p> <p>14 A. Not really, no. I really wasn't, no.</p> <p>15 Q. Okay. How come?</p> <p>16 A. At the time, I was just going</p> <p>17 through -- you know, I was going through a</p> <p>18 divorce. And, I don't know, I was trying to,</p> <p>19 you know -- really just trying to find myself or</p> <p>20 what I really wanted to do.</p> <p>21 So, I don't know, it was -- it was a</p> <p>22 part of my life where -- where, as I -- you</p> <p>23 know, I was just kind of, like, lost, I would</p> <p>24 say, you know.</p>

11 (Pages 26 to 29)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 30	Page 32
<p>1 I was -- I don't know I was going</p> <p>2 through a divorce at that time, so I -- I wasn't</p> <p>3 working or nothing.</p> <p>4 Q. How were you financially supporting</p> <p>5 yourself during that time period, sir?</p> <p>6 A. I sold drugs.</p> <p>7 Q. Mr. Blair, I meant to ask you this</p> <p>8 earlier.</p> <p>9 Following the divorce with your wife</p> <p>10 Pamela, did you financially provide assistance</p> <p>11 to your children?</p> <p>12 A. Oh, of course. Of course.</p> <p>13 Q. Okay.</p> <p>14 A. Yeah. I think that's why she never</p> <p>15 put me on child support.</p> <p>16 Q. Mr. Blair, have you ever used illegal</p> <p>17 drugs?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. When was the first time you</p> <p>20 used an illegal drug?</p> <p>21 A. I think I was, like, 17.</p> <p>22 Q. And what type of drug did you use?</p> <p>23 A. Marijuana. Then I graduated to,</p> <p>24 like -- I've used heroin and drunk a drink on</p>	<p>1 Q. How did you ingest the heroin?</p> <p>2 A. Snort it.</p> <p>3 Q. Sir, are you currently still using</p> <p>4 marijuana?</p> <p>5 A. Yes.</p> <p>6 Q. How often do you use marijuana?</p> <p>7 A. Maybe four or five times a week.</p> <p>8 Q. And you previously testified that you</p> <p>9 occasionally drink alcohol. Is that still the</p> <p>10 case today?</p> <p>11 A. Not as much as I used to, yeah, but I</p> <p>12 still drink on occasion, yeah.</p> <p>13 Q. And, sir, when you were using heroin</p> <p>14 every day, who would you get the heroin from?</p> <p>15 A. Pardon me?</p> <p>16 Q. Who would you get the heroin from</p> <p>17 that you were using every day?</p> <p>18 A. Different people, different people</p> <p>19 that was in my neighborhood.</p> <p>20 Q. Can you recall any of those</p> <p>21 individuals' names?</p> <p>22 A. I don't know. I can give you</p> <p>23 nicknames, but I don't -- because -- one of them</p> <p>24 was named Big Shorty. Another name was B-Lo.</p>
Page 31	Page 33
<p>1 occasion, but that's about it.</p> <p>2 MR. FLAXMAN: And just let her ask the</p> <p>3 questions.</p> <p>4 THE WITNESS: Ha?</p> <p>5 MR. FLAXMAN: Just answer what she said --</p> <p>6 what she's asking.</p> <p>7 THE WITNESS: Okay. All right. Okay.</p> <p>8 BY MS. WEST:</p> <p>9 Q. When did you first start using</p> <p>10 heroin, sir?</p> <p>11 A. About -- I think I was, like, 19.</p> <p>12 Q. Are you still using heroin?</p> <p>13 A. No.</p> <p>14 Q. When did you stop using heroin?</p> <p>15 A. 20-- 2015, I think, some-- yeah,</p> <p>16 like, 2015.</p> <p>17 Q. And when you were using heroin, sir,</p> <p>18 how often would you use?</p> <p>19 A. Every day.</p> <p>20 Q. How much would you use every day,</p> <p>21 sir?</p> <p>22 A. Maybe three or four bags a day.</p> <p>23 Q. How much does a -- did a bag cost?</p> <p>24 A. \$10.</p>	<p>1 Q. And when did you --</p> <p>2 A. That's about it.</p> <p>3 Q. I'm sorry. I didn't mean to cut you</p> <p>4 off.</p> <p>5 A. No. That's it. That was about --</p> <p>6 that's all who I can remember at the time.</p> <p>7 Q. And when did you -- strike that.</p> <p>8 Did you purchase the heroin when you</p> <p>9 would obtain heroin from Big Shorty?</p> <p>10 A. Sometimes, yeah.</p> <p>11 Q. How would you acquire the drugs from</p> <p>12 Big Shorty if you didn't pay him?</p> <p>13 A. I worked for him.</p> <p>14 Q. Okay. So as a part of your payment</p> <p>15 for working for Big Shorty, he would pay you</p> <p>16 with narcotics?</p> <p>17 A. And cash, yes.</p> <p>18 Q. Okay. And I'm sorry. Maybe I asked</p> <p>19 you this already. What years did you purchase</p> <p>20 or acquire drugs from Big Shorty?</p> <p>21 A. Around 2005, something -- or, no,</p> <p>22 maybe even before then. I take that back. Way</p> <p>23 before then. Maybe, like, 2003/2002, somewhere</p> <p>24 up in there, yeah.</p>

12 (Pages 30 to 33)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 34	<p>1 Q. And for how long did you purchase or</p> <p>2 acquire drugs from Big Shorty?</p> <p>3 A. A few years up until he got killed.</p> <p>4 Q. And when did you purchase or acquire</p> <p>5 drugs from B-Lo?</p> <p>6 A. Around the same time.</p> <p>7 Q. Sir, would you say that you had a</p> <p>8 heroin addiction from the time you were 19 years</p> <p>9 old until you stopped in 2015?</p> <p>10 A. Yes.</p> <p>11 Q. When you used, sir, would you use</p> <p>12 with other people or would you use alone?</p> <p>13 A. Sometimes alone and sometimes with</p> <p>14 other people.</p> <p>15 Q. When did you first start selling</p> <p>16 drugs?</p> <p>17 A. About -- in the -- like, '99/'98 --</p> <p>18 '98 or '99, up in there somewhere.</p> <p>19 Q. And when you first started selling</p> <p>20 drugs, what drug were you selling?</p> <p>21 A. Heroin and crack cocaine.</p> <p>22 Q. And where would you sell?</p> <p>23 A. Sometimes in the projects, in Ida B.</p> <p>24 Wells projects.</p>	Page 36	<p>1 habit, actually. So I wasn't, like, making</p> <p>2 no -- no -- you know, no big chunk of money or</p> <p>3 nothing like that.</p> <p>4 Q. And when you weren't -- the time</p> <p>5 period when you weren't working for Big Shorty,</p> <p>6 did you work for anyone else?</p> <p>7 A. Yeah, I worked for B-Lo. I worked</p> <p>8 for B-Lo, too.</p> <p>9 Q. Okay. And I'm sorry. What did --</p> <p>10 you may have told me this. What years did you</p> <p>11 work for B-Lo?</p> <p>12 A. Like, around the same period.</p> <p>13 Q. Okay. Were Big Shorty and B-Lo</p> <p>14 working together?</p> <p>15 A. No.</p> <p>16 Q. Okay. Did Big Shorty sell drugs out</p> <p>17 of a particular building in the Ida B. Wells...</p> <p>18 A. No. Nah. He didn't -- he didn't --</p> <p>19 he, like -- he wasn't -- he wasn't the actual</p> <p>20 seller. He was -- he was, like, the person that</p> <p>21 distribute to the -- to the people that would</p> <p>22 work for him.</p> <p>23 Q. Okay. So did Big Shorty control the</p> <p>24 drug sales in a particular building in Ida B.</p>
Page 35	<p>1 Q. And when you weren't selling in the</p> <p>2 Ida B. Wells projects, where else would you</p> <p>3 sell?</p> <p>4 A. Just on the street.</p> <p>5 Q. Any particular location?</p> <p>6 A. Between 35th and 39th Street --</p> <p>7 between 35th and 39th Street, like -- like, 35th</p> <p>8 and Ellis, in that -- in that particular area.</p> <p>9 Q. And how long did you sell heroin or</p> <p>10 crack for, sir?</p> <p>11 A. About ten years. Ten years.</p> <p>12 Q. Okay. So from approximately 1998</p> <p>13 until 2008/2009, you sold drugs?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. Would you sell every day?</p> <p>16 A. Sometime- -- no, I didn't sell every</p> <p>17 day, no.</p> <p>18 Q. How often would you sell?</p> <p>19 A. Maybe four or five times out</p> <p>20 of the -- out of the week.</p> <p>21 Q. How much money were you making on a</p> <p>22 weekly basis selling drugs?</p> <p>23 A. Oh, I really wasn't making that much</p> <p>24 money. I just sold just to take care of my</p>	Page 37	<p>1 Wells?</p> <p>2 A. Well, I wouldn't say a particular</p> <p>3 building; but he had a particular area that</p> <p>4 he -- that he controlled, yeah.</p> <p>5 Q. Okay. What area did he control?</p> <p>6 A. He controlled, like, 38th and -- 39th</p> <p>7 and, like, Vincennes. He didn't -- he didn't</p> <p>8 really control the -- in the -- in the Ida B.</p> <p>9 Wells extension apartment buildings.</p> <p>10 Q. Okay. Now, you said that Big Shorty</p> <p>11 was a distributor; meaning, did he pass drugs to</p> <p>12 other individuals who sold for him?</p> <p>13 A. Exactly.</p> <p>14 Q. Okay. When you were working for Big</p> <p>15 Shorty, how many other individuals were working</p> <p>16 for Big Shorty?</p> <p>17 A. Well, I -- I couldn't give you a</p> <p>18 definitive answer or I would -- I could only</p> <p>19 maybe give you, like, three or four people.</p> <p>20 Q. And do you recall any of those</p> <p>21 individuals' names that sold drugs for Big</p> <p>22 Shorty the same time period that you did?</p> <p>23 A. No, I can't recall -- I can't recall</p> <p>24 who he had -- you know, who he had working for</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 38	Page 40
<p>1 him at that period -- at that time. I just --</p> <p>2 Q. And when --</p> <p>3 A. -- I knew them -- I knew them</p> <p>4 because -- you know, just for me living in that</p> <p>5 area.</p> <p>6 Q. So when was the first time you met</p> <p>7 Big Shorty?</p> <p>8 A. I don't remember.</p> <p>9 Q. Did Big Shorty live in the same area</p> <p>10 in which you grew up in?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Do you know where he lived?</p> <p>13 A. I couldn't -- no, I don't -- I don't</p> <p>14 know the correct address, no. I don't -- I</p> <p>15 don't know. I couldn't tell you that.</p> <p>16 Q. Did Big Shorty live in the Ida B.</p> <p>17 Wells complex?</p> <p>18 A. Yeah. He didn't -- he lived in an</p> <p>19 Ida B. Wells row house.</p> <p>20 Q. In the row houses. Did he sell out</p> <p>21 of the row houses?</p> <p>22 A. He didn't sell, but, yeah, his --</p> <p>23 his -- his team -- people that was on his team</p> <p>24 sold in -- in that area, yeah.</p>	<p>1 Q. Do you recall how many people you</p> <p>2 worked with?</p> <p>3 A. Maybe four or five people.</p> <p>4 Q. And of those four to five people, did</p> <p>5 all of them sell drugs or did they have other</p> <p>6 roles?</p> <p>7 A. They had other roles.</p> <p>8 Q. Okay --</p> <p>9 A. We all had -- we all had different</p> <p>10 roles.</p> <p>11 Q. I'm sorry. I didn't mean to cut you</p> <p>12 off, sir. What did you say?</p> <p>13 A. I said we all had different roles.</p> <p>14 Q. Okay. And during the time period</p> <p>15 that you worked for B-Lo, was your role to sell</p> <p>16 drugs?</p> <p>17 A. Sometimes, yeah.</p> <p>18 Q. Okay. What other roles would you</p> <p>19 play when you worked for B-Lo?</p> <p>20 A. Worked security.</p> <p>21 Q. Okay. And what does working security</p> <p>22 mean?</p> <p>23 A. Working security means watching out</p> <p>24 for the police, searching customers before they</p>
Page 39	Page 41
<p>1 Q. Okay. When you sold drugs for Big</p> <p>2 Shorty, where specifically would you sell?</p> <p>3 A. On 38th and Vincennes.</p> <p>4 Q. Okay. Now, you said you also worked</p> <p>5 for B-Lo for a period of time, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Did B-Lo himself sell drugs?</p> <p>8 A. Sometimes.</p> <p>9 Q. And when he sold drugs, where would</p> <p>10 he sell out of?</p> <p>11 A. He was -- he would sell out of the</p> <p>12 Ida B. Wells extension apartments.</p> <p>13 Q. Was there a particular building that</p> <p>14 he would sell out of?</p> <p>15 A. Yeah, he sold out of 5- -- 574 East</p> <p>16 Browning.</p> <p>17 Q. So you were working for both Big</p> <p>18 Shorty and B-Lo at the same time period; is that</p> <p>19 right?</p> <p>20 A. Yeah, pretty much, yeah.</p> <p>21 Q. Okay. When you were working for</p> <p>22 B-Lo, were there other individuals that worked</p> <p>23 for B-Lo at the time?</p> <p>24 A. Yes.</p>	<p>1 come in the building. That's pretty much it.</p> <p>2 Q. Did you work in any other capacity</p> <p>3 for B-Lo other than selling or working security?</p> <p>4 A. No.</p> <p>5 Q. Okay. Now, you say that you were</p> <p>6 paid in drugs as well as cash by Big Shorty.</p> <p>7 How did B-Lo pay you?</p> <p>8 A. Same way.</p> <p>9 Q. How much -- how much cash would you</p> <p>10 get when they paid you?</p> <p>11 A. He would -- cash, he would give,</p> <p>12 like, maybe 40 or \$50 and --</p> <p>13 Q. And was that one day?</p> <p>14 A. Yeah. And he would -- and you had a</p> <p>15 choice. Like, you would get what you would call</p> <p>16 a -- you would get a wake-up, a midday, and a</p> <p>17 take-home. If you didn't -- those, you know --</p> <p>18 those, like, the -- the bags that you would get.</p> <p>19 If you didn't want the bags, then you would --</p> <p>20 you could get \$10 instead of getting -- instead</p> <p>21 of getting drugs.</p> <p>22 Q. So you had the option --</p> <p>23 A. And then --</p> <p>24 Q. I'm sorry. Go ahead.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 42	<p>1 A. And then at the end of the -- of</p> <p>2 the -- of the day, then you would get, you know,</p> <p>3 your pay for that day.</p> <p>4 Q. And so then you had the option of</p> <p>5 having -- getting at least three bags of heroin</p> <p>6 a day?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Okay. If you got three bags of</p> <p>9 heroin a day, would you take home any cash at</p> <p>10 the end of the day?</p> <p>11 A. Yes.</p> <p>12 Q. How much additional cash would you</p> <p>13 take home?</p> <p>14 A. You -- about 40 or 50 bucks.</p> <p>15 Q. Okay. And did you typically opt to</p> <p>16 take the three bags of drugs a day?</p> <p>17 A. Yeah.</p> <p>18 Q. Did you ever work security for B-Lo</p> <p>19 out of the 574 Building?</p> <p>20 A. Yes.</p> <p>21 Q. And you also sold drugs out of the</p> <p>22 574 Building when you were working for him?</p> <p>23 A. Yes.</p> <p>24 Q. Did you ever sell drugs out of any</p>	Page 44	<p>1 Q. Okay. When you sold out of the</p> <p>2 540 Building in 2003 to 2004 -- or approximately</p> <p>3 2003/2004 for Baker, did you work with anyone</p> <p>4 else?</p> <p>5 A. I -- I probably did, but I can't</p> <p>6 remember who it was.</p> <p>7 Q. And when you worked for Baker out of</p> <p>8 the 540 Building, in what capacity did you work?</p> <p>9 A. I worked -- I was -- I worked</p> <p>10 security, and I worked -- and I pitched.</p> <p>11 Q. And what does it mean to pitch?</p> <p>12 A. You -- you sell. You the one that's</p> <p>13 selling.</p> <p>14 Q. Okay. Did Baker sell drugs himself?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Do you know the nicknames of</p> <p>17 anybody that you worked with when you worked out</p> <p>18 of the 540 Building?</p> <p>19 A. Yeah. Short Body, Step Light,</p> <p>20 Double R. That's about all I can remember at</p> <p>21 that time.</p> <p>22 Q. And let me go back.</p> <p>23 When you sold for B-Lo, do you know</p> <p>24 the nicknames of any of the other individuals</p>
Page 43	<p>1 other high-rise building in the Ida B. Wells</p> <p>2 complex?</p> <p>3 A. Yes.</p> <p>4 Q. What other buildings did you sell out</p> <p>5 of?</p> <p>6 A. 540 -- 540 and 575.</p> <p>7 Q. What time period did you sell out of</p> <p>8 the 540 Building?</p> <p>9 A. 2003/2004.</p> <p>10 Q. Were you working for anyone when you</p> <p>11 sold out of the 540 Building?</p> <p>12 A. Yeah.</p> <p>13 Q. Who were you working for?</p> <p>14 A. This guy named Baker.</p> <p>15 Q. Do you know what Baker's first name</p> <p>16 was?</p> <p>17 A. No. I can't --</p> <p>18 Q. And, to be clear, was Baker a last</p> <p>19 name or a nickname, sir?</p> <p>20 A. Baker was a last name. That was his</p> <p>21 last name. Yeah, that was his last name.</p> <p>22 Q. I'm sorry. All of that cut out for</p> <p>23 me. I didn't hear anything.</p> <p>24 A. Yeah, Baker was his last name.</p>	Page 45	<p>1 that you sold with?</p> <p>2 A. Yeah. Let me see. Yeah, Rio. You</p> <p>3 had Peanut. That's about all I can remember.</p> <p>4 Q. Okay. And do you recall the</p> <p>5 nicknames of any of the individuals you worked</p> <p>6 with when you worked for Big Shorty?</p> <p>7 A. I can't remember that -- I can't</p> <p>8 remember those people because Big Shorty, he --</p> <p>9 he had, like, a little tight-knit crew, but I</p> <p>10 cannot -- really don't remember all of their</p> <p>11 names. I really, like, knew them by face, you</p> <p>12 know.</p> <p>13 Q. And why did you stop selling out of</p> <p>14 the 540 Building?</p> <p>15 A. Why did I -- why did I stop?</p> <p>16 Q. Yes.</p> <p>17 A. They -- they tore the building down.</p> <p>18 Q. Okay. So did you work off and on out</p> <p>19 of the 540 Building from approximately 2003</p> <p>20 until they tore the buildings down?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. When did you work out of the</p> <p>23 575 Building?</p> <p>24 A. Around the same period.</p>

15 (Pages 42 to 45)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 46

1 **Q. Around 2003/2004?**
2 A. Mm-hm.
3 **Q. Is that a yes?**
4 A. Yes.
5 **Q. And did you work for anybody when you**
6 **sold out of the 575 building?**
7 A. Yes.
8 **Q. Who did you work for?**
9 A. This guy named Sing.
10 **Q. And in what capacity did you work**
11 **when you worked for Sing?**
12 A. I was head of security.
13 **Q. Do you recall the names of -- names**
14 **or nicknames of any of the individuals you**
15 **worked with when you worked out of the**
16 **575 Building?**
17 A. Yeah, it was me, Peanut, sometimes
18 Short Body, Mario. That's all I can remember
19 right now.
20 **Q. And when you sold -- strike that.**
21 **Did you sell out of the 575 Building**
22 **on and off from approximately 2003 until the**
23 **buildings came down?**
24 A. Yes.

Page 47

1 **Q. Is the same thing true for the**
2 **574 Building?**
3 A. Kind of, but I didn't really work in
4 that building. I just -- only sometimes.
5 **Q. And when you worked out of the**
6 **540 Building for Baker, how would you get paid?**
7 A. We got paid in narcotics and got paid
8 in cash.
9 **Q. Okay. So during this time period,**
10 **are you selling at various different buildings**
11 **for various different individuals?**
12 A. Yes.
13 **Q. Okay. So are you getting paid by**
14 **every person that you're selling for at the same**
15 **time?**
16 A. It all depends on who you work for
17 that day.
18 **Q. Okay.**
19 A. But, I mean, it wasn't like, you
20 know -- it all -- it depended on who you -- you
21 know, who team you was on on that -- for that
22 particular day. You know, unless you all had
23 a -- unless you and the other individual had a
24 good camaraderie, you know, you'd probably mess

Page 48

1 with him for a period of time or, you know -- or
2 one day, he might -- or he might take a week or
3 something off or -- and you'll have to find
4 somebody else to work for.
5 So that's how -- that's how that
6 worked out.
7 **Q. Was there ever a particular day that**
8 **you were working for two different individuals**
9 **at the same time?**
10 A. No.
11 **Q. Were there certain individuals that**
12 **controlled a building and the sales, the drug**
13 **sales, that went on in that building in the**
14 **Ida B. Wells complex?**
15 A. I don't -- I -- I can't give you an
16 answer on that because I really don't know. You
17 know, I don't know how they -- how they work.
18 They -- you know, that was above my pay grade.
19 I don't know.
20 **Q. Okay. And were different drug lines**
21 **sold out of different buildings in the Ida B.**
22 **Wells complex?**
23 A. Yeah, absolutely.
24 **Q. And what does that mean? What does a**

Page 49

1 **drug line mean?**
2 A. Like, you know, a drug line means
3 that you might -- you might have, like, two or
4 three people selling -- selling drugs out of the
5 same -- out of the same building, you know.
6 But, like -- like, for instance, if
7 you worked for B-Lo, B-Lo might say this
8 individual -- another individual might be
9 working that -- it was okay for another
10 individual to work in -- out of the same
11 building.
12 So that would be, like, maybe two or
13 three lines in the same building.
14 **Q. And did the drug lines have different**
15 **names?**
16 A. Of course.
17 **Q. Okay. And what -- do you recall any**
18 **of the names of the drug lines?**
19 A. Yeah, I -- yeah. I -- I can remember
20 some of the names, not all of them.
21 Let me see. You had like lines named
22 Paid in Full, Ass Wiper. I don't know, they had
23 all -- all kind of crazy names. Soul Train.
24 It was -- you know, people like to

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 50

1 call their stuff different names, I guess.
2 **Q. And were different types of drugs**
3 **sold out of different buildings?**
4 A. Mm-hm. Yeah.
5 **Q. Okay. Did you typically always sell**
6 **heroin?**
7 A. Yes.
8 **Q. Did you ever sell crack?**
9 A. Yes.
10 **Q. Okay. All right, Mr. Blair. Let's**
11 **take a quick five-minute break here before we**
12 **switch gears.**
13 A. Okay.
14 THE VIDEOGRAPHER: The time is now 11:05.
15 This is the end of Media 1. We're off the
16 record.
17 (WHEREUPON, a recess was had.)
18 THE VIDEOGRAPHER: The time is now
19 11:17 a.m. This is the beginning of Media 2.
20 We're back on the record.
21 BY MS. WEST:
22 **Q. Mr. Blair, you stopped using heroin**
23 **in 2015; is that right?**
24 A. Yes.

Page 51

1 **Q. Okay. And did you -- how did you**
2 **stop using heroin, sir?**
3 A. You said how did I?
4 **Q. Yes.**
5 A. I got into a program.
6 **Q. What program did you participate in?**
7 A. I think it was called SASSI.
8 **Q. Was it an inpatient or an outpatient**
9 **program?**
10 A. Outpatient.
11 **Q. As a part of the outpatient program,**
12 **what did you have to do?**
13 A. You -- they -- you drink methadone.
14 **Q. And how long did you drink methadone?**
15 A. Maybe about a -- maybe about a year
16 and a half.
17 **Q. Did you --**
18 A. (Indiscernible.)
19 **Q. I'm sorry. Go ahead.**
20 A. Never mind. Go ahead. Go ahead.
21 I'm sorry.
22 **Q. No. Did you have to attend any**
23 **meetings as a part of the outpatient program?**
24 A. Of course.

Page 52

1 **Q. How often would you attend meetings?**
2 A. You had to -- you had to come to a
3 meeting twice a week.
4 **Q. And did you voluntarily participate**
5 **in this outpatient program?**
6 A. Yes.
7 **Q. Okay. How did you hear about this**
8 **program, this particular program?**
9 A. From other people that was on the
10 program.
11 **Q. Okay. And since 2015, you have not**
12 **used heroin?**
13 A. Occasionally, yes, but not -- you
14 know, not like when I was -- I just dabbled and
15 dabbled, I guess you would say.
16 **Q. Okay. And when you say**
17 **"occasionally," when was the last time you used**
18 **heroin?**
19 A. Oh, maybe about five or six years
20 ago.
21 **Q. Okay. And, again, when you say**
22 **occasionally, would it be weekly, monthly? How**
23 **often would you use it? This is --**
24 A. Oh --

Page 53

1 **Q. -- post 2015.**
2 A. Oh, this -- it was -- like, maybe if
3 I didn't make it to -- to drink methadone, I
4 would use.
5 **Q. Okay. So --**
6 A. So, I mean, that would be, like, the
7 only time that I would really use at that time.
8 **Q. Okay. And was that about a year**
9 **following -- strike that.**
10 **That was during that year that you**
11 **were participating in the outpatient program?**
12 A. Yes.
13 **Q. Okay. Now, previously, Mr. Blair,**
14 **you testified that you provided money or**
15 **financial assistance for your children while**
16 **they were growing up, correct?**
17 A. Yes.
18 **Q. Okay. And when you were selling**
19 **drugs, would you send a portion of the money**
20 **that you made to your children?**
21 A. Yes, if -- if they needed something,
22 yes.
23 **Q. Okay. So it wasn't like you sent a**
24 **set amount of money every week or every month?**

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 54	<p>1 A. No.</p> <p>2 Q. Okay. So it was just if they needed</p> <p>3 something, would you send money; is that</p> <p>4 correct?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. Mr. Blair, do you have a</p> <p>7 memory of being arrested on July 10, 2004, at</p> <p>8 the 540 Building?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Do you recall what time of day</p> <p>11 you were arrested?</p> <p>12 A. I think it was right -- like, 2:00 in</p> <p>13 the afternoon, somewhere up in there.</p> <p>14 Q. Okay. Do you have a memory of what</p> <p>15 you did prior to being arrested that day?</p> <p>16 A. Somewhat, yes.</p> <p>17 Q. Okay. So what --</p> <p>18 A. (Indiscernible.)</p> <p>19 Q. I'm sorry. Go ahead.</p> <p>20 A. I said I remember what I did, yeah.</p> <p>21 Q. Okay. What did you -- what did you</p> <p>22 do the morning of July 10, 2004?</p> <p>23 A. I got up. I went to Dunkin' Donuts,</p> <p>24 got me a cup of coffee, went back home, watched</p>	Page 56	<p>1 about. We just, you know -- just talking,</p> <p>2 talking to each other, just conversing amongst</p> <p>3 ourselves.</p> <p>4 Q. Okay. And the morning of July 10,</p> <p>5 2004, before you went to the 540 Building, did</p> <p>6 you sell any type of illegal drug?</p> <p>7 A. No, ma'am.</p> <p>8 Q. So July 10, 2004, you -- you weren't</p> <p>9 working that day selling drugs?</p> <p>10 A. No, ma'am. No, no.</p> <p>11 Q. Was there a particular reason why you</p> <p>12 weren't selling drugs on that particular day?</p> <p>13 A. Because I -- yeah, I didn't -- first</p> <p>14 of all, I woke up late, and I just wanted to</p> <p>15 take the day off, basically. So that's why I</p> <p>16 didn't work that day.</p> <p>17 Q. What time did you wake up that day?</p> <p>18 A. Oh, about 9:30/10:00.</p> <p>19 Q. And when you were selling drugs, what</p> <p>20 time would you typically wake up in the morning?</p> <p>21 A. 6:30.</p> <p>22 Q. And why was that?</p> <p>23 A. Because we started selling at 7:00.</p> <p>24 Q. At some point in time on July 10,</p>
Page 55	<p>1 a little TV. Then I came -- I guess I came back</p> <p>2 outside about -- maybe, about 12:00-ish. I came</p> <p>3 back outside and just -- just talked to my</p> <p>4 buddies that was -- you know, that was outside.</p> <p>5 Q. Okay. And who were the buddies that</p> <p>6 you were speaking with when you were -- strike</p> <p>7 that.</p> <p>8 When you were telling me that you</p> <p>9 were -- strike that.</p> <p>10 When you testified that you were</p> <p>11 speaking with your buddies outside, were you</p> <p>12 outside of your residence at 3610 South Rhodes?</p> <p>13 A. No, I was -- I was, you know, just,</p> <p>14 you know, walking through -- just walking</p> <p>15 through our neighborhood.</p> <p>16 Q. Okay. Who were you with at the time?</p> <p>17 A. At the time, I wasn't with any</p> <p>18 particular -- any particular individual. We</p> <p>19 just, you know -- we just -- it was just people</p> <p>20 that was -- that's outside. We was just, you</p> <p>21 know -- you know, talking and, you know, just</p> <p>22 laughing and talking.</p> <p>23 It wasn't anything in particular,</p> <p>24 like any particular situation we was talking</p>	Page 57	<p>1 2004, did you go to the 540 Building?</p> <p>2 A. Yes.</p> <p>3 Q. Do you recall what time you first</p> <p>4 arrived at the 540 Building?</p> <p>5 A. I would say maybe about 12:30/1:00,</p> <p>6 somewhere up in there.</p> <p>7 Q. And did you walk to the 540 Building?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. And why were you going to the</p> <p>10 540 Building on that particular day?</p> <p>11 A. Well, I really -- I really wasn't</p> <p>12 going particularly to the building, you know. I</p> <p>13 was, like -- because there was a lot of people</p> <p>14 outside. You know, I was, like -- it was --</p> <p>15 it's, like, a parking lot; and, you know, a lot</p> <p>16 of people would hang out in that parking lot.</p> <p>17 So that's why, you know, I was near</p> <p>18 the building.</p> <p>19 Q. Okay. And did you walk over to that</p> <p>20 parking lot with anyone on July 10, 2004?</p> <p>21 A. No.</p> <p>22 Q. When you arrived -- when you first</p> <p>23 arrived around 12:30 or 1:00 to the parking lot</p> <p>24 outside of the 540 Building, did you recognize</p>

18 (Pages 54 to 57)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 58	<p>1 any of the individuals that were standing</p> <p>2 outside the building?</p> <p>3 A. Yes.</p> <p>4 Q. Who did you recognize?</p> <p>5 A. A few of my friends. Step Light, she</p> <p>6 was out there. Short Body was out there. It</p> <p>7 was quite a few people out there. I can't</p> <p>8 remember all of them. You know, it was -- it</p> <p>9 was a little -- a nice day that day. It was</p> <p>10 a lot of people outside.</p> <p>11 Q. How many people would you say were</p> <p>12 outside when you first arrived to the parking</p> <p>13 lot of the 540 Building?</p> <p>14 A. At least 10 to 15 people.</p> <p>15 Q. And the individuals that you</p> <p>16 previously mentioned that you knew --</p> <p>17 Step Light, Short Body -- those individuals were</p> <p>18 people that you had sold drugs with; is that</p> <p>19 correct?</p> <p>20 A. Yeah, that's correct.</p> <p>21 Q. Okay. How about an individual with</p> <p>22 the nickname Double R; was he outside the</p> <p>23 building that day when you arrived?</p> <p>24 A. I can't recall. I don't -- I don't</p>	Page 60	<p>1 A. Mm-hm. Yes.</p> <p>2 Q. Okay. So that particular morning,</p> <p>3 you didn't use heroin when you woke up?</p> <p>4 A. No, I hadn't had a chance to get it.</p> <p>5 Q. Okay. Were you going to buy heroin</p> <p>6 at the 540 Building?</p> <p>7 A. I wasn't going particular to that</p> <p>8 building, but I was going in that area. I just</p> <p>9 didn't have time to go get anything.</p> <p>10 Q. Did you have any cash on you that</p> <p>11 day?</p> <p>12 A. Yeah, but not much.</p> <p>13 Q. How much did you have on you?</p> <p>14 A. I think I had about maybe 15,</p> <p>15 20 bucks.</p> <p>16 Q. Were you planning on using that money</p> <p>17 to buy heroin?</p> <p>18 A. Yes.</p> <p>19 Q. Did you enter the 540 Building at all</p> <p>20 before the police arrived on the scene?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. How long after you entered the</p> <p>23 building did you see police?</p> <p>24 A. Actually, I -- the only thing I did</p>
Page 59	<p>1 think so, though. He could have been or he</p> <p>2 could have been maybe somewhere in the area.</p> <p>3 But I don't recall him, like -- I think he -- we</p> <p>4 probably spoke, and we just was -- we went our</p> <p>5 separate ways.</p> <p>6 But, I mean, I seen him that day,</p> <p>7 yeah.</p> <p>8 Q. How long were you outside the</p> <p>9 540 Building before police arrived on the scene?</p> <p>10 A. Approximately 45 minutes to an hour.</p> <p>11 Q. And in that 45 minutes to an hour,</p> <p>12 what were you doing?</p> <p>13 A. Smoking cigarettes and drinking beer,</p> <p>14 and I was outside talking to my buddies,</p> <p>15 Step Light.</p> <p>16 Q. Had you used heroin that day before</p> <p>17 you were arrested?</p> <p>18 A. No.</p> <p>19 Q. You previously testified that you</p> <p>20 used heroin every day --</p> <p>21 A. Yes.</p> <p>22 Q. -- for approximately -- since the</p> <p>23 time you were, I think, what did you say, 19 to</p> <p>24 2015; is that right?</p>	Page 61	<p>1 was I went in the building, but I came right</p> <p>2 back out, you know, because they wasn't --</p> <p>3 wasn't nobody working yet.</p> <p>4 So me and Step Light was going to go</p> <p>5 to another building, but we -- we didn't -- we</p> <p>6 was -- we were out there talking and laughing so</p> <p>7 much, we -- I didn't really -- wasn't really</p> <p>8 paying attention to the time or, you know, how</p> <p>9 long I was before the officers came.</p> <p>10 But we -- I wasn't -- like I said, I</p> <p>11 just went -- I just went in there to see who</p> <p>12 was -- who was in there and wasn't nobody that I</p> <p>13 would have messed with was in there. So I just</p> <p>14 came back out.</p> <p>15 Q. Okay. So at some point in time, you</p> <p>16 and Step Light went into the 540 Building to</p> <p>17 look to purchase drugs?</p> <p>18 A. Yeah, we were, yeah, but --</p> <p>19 Q. Okay.</p> <p>20 A. -- they wasn't working yet.</p> <p>21 Q. Okay. Was anyone selling drugs</p> <p>22 inside the 540 Building when you went in to</p> <p>23 purchase?</p> <p>24 A. I'm quite sure it was, but I can't</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 62	Page 64
<p>1 remember who it was.</p> <p>2 Q. Did you have a particular individual</p> <p>3 that you bought drugs from out of the</p> <p>4 540 Building that you were looking for that day?</p> <p>5 A. Yeah.</p> <p>6 Q. What was that individual's name or</p> <p>7 nickname?</p> <p>8 A. I was looking for Baker.</p> <p>9 Q. Okay. And you -- you were</p> <p>10 unsuccessful in finding Baker that day?</p> <p>11 A. Right. I hadn't -- yeah, he</p> <p>12 wasn't -- he hadn't got there yet.</p> <p>13 Q. Okay. Ultimately, at some point in</p> <p>14 time, do police arrive on the scene?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Are you outside when the</p> <p>17 police first arrived?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. How many cars pulled up</p> <p>20 outside the 540 Building?</p> <p>21 A. Two, I think. Two.</p> <p>22 Q. And were the vehicles marked or</p> <p>23 unmarked police vehicles?</p> <p>24 A. Unmarked.</p>	<p>1 went by?</p> <p>2 A. No.</p> <p>3 Q. Okay. Can you describe what the</p> <p>4 other officers looked like?</p> <p>5 A. They were -- they were Black</p> <p>6 officers. I can't -- I can't really say if they</p> <p>7 were skinny or fat or whatever, but I know they</p> <p>8 were, like -- they were, like, Black officers.</p> <p>9 But they didn't frequent the area</p> <p>10 that much --</p> <p>11 Q. Okay. And --</p> <p>12 A. -- and if they did, I -- I wasn't</p> <p>13 aware of -- of those two.</p> <p>14 Q. And the remaining other officers that</p> <p>15 you don't know their names that were Black</p> <p>16 officers, were they men or women?</p> <p>17 A. Men.</p> <p>18 Q. Okay. So every officer that was</p> <p>19 there that day was a man?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And you can't provide me with</p> <p>22 any other description other than that they were</p> <p>23 Black?</p> <p>24 A. Right, I just remember they were</p>
Page 63	Page 65
<p>1 Q. Okay. Did the officers exit the --</p> <p>2 the two vehicles?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. How many officers in total got</p> <p>5 out of the two cars?</p> <p>6 A. Approximately four or five, I think.</p> <p>7 Q. Okay. Out of those four or five</p> <p>8 officers, did any of them have on a uniform?</p> <p>9 A. No.</p> <p>10 Q. Okay. Were they in plain clothes?</p> <p>11 A. Yes.</p> <p>12 Q. Did you recognize any of those four</p> <p>13 or five officers?</p> <p>14 A. Yes.</p> <p>15 Q. How many officers did you recognize?</p> <p>16 A. Two.</p> <p>17 Q. Okay. What were the names of the two</p> <p>18 officers that you recognized?</p> <p>19 A. Officer Mohammed and Sergeant Watts.</p> <p>20 Q. The other remaining officers, had you</p> <p>21 ever seen them before?</p> <p>22 A. Yeah, I had seen them before, but I</p> <p>23 didn't know their name.</p> <p>24 Q. Did you know a nickname that they</p>	<p>1 Black officers. I can't remember how they</p> <p>2 looked. That was a while -- that was a long</p> <p>3 time ago.</p> <p>4 Q. Once the police arrived on the scene,</p> <p>5 what happened?</p> <p>6 A. Well, when the police arrived, people</p> <p>7 started running.</p> <p>8 Q. Did you yourself run, sir?</p> <p>9 A. No.</p> <p>10 Q. Did you remain outside the</p> <p>11 540 Building when the police walked up?</p> <p>12 A. When they pulled up, yes.</p> <p>13 Q. Okay. After the police exited the</p> <p>14 vehicle, did they walk over to where you were in</p> <p>15 the -- outside the 540 Building?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Was there anyone else that</p> <p>18 stayed with you outside the 540 Building when</p> <p>19 the police arrived?</p> <p>20 A. Yes. Step Light stayed. She -- Step</p> <p>21 Light was with me.</p> <p>22 Q. Okay.</p> <p>23 A. We were together.</p> <p>24 Q. Do you know Step Light's real name?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 66	<p>1 A. Stephanie -- Stephanie Watson, I</p> <p>2 think.</p> <p>3 Q. Okay. Did any other individual other</p> <p>4 than Step Light, or Stephanie Watson, stay</p> <p>5 outside the 540 Building when the police</p> <p>6 arrived?</p> <p>7 A. I don't remember. I don't remember.</p> <p>8 Q. Okay. While you're outside the</p> <p>9 540 Building, did any one of those officers</p> <p>10 speak to you?</p> <p>11 A. No, they didn't speak. They was</p> <p>12 like: You, come here.</p> <p>13 Q. And which officer said that?</p> <p>14 A. Watts.</p> <p>15 Q. And what did you do or say in</p> <p>16 response?</p> <p>17 A. I was like: What's up, man?</p> <p>18 He's like -- he was like: Come here.</p> <p>19 I need to talk to you.</p> <p>20 So I -- you know, I walked over there</p> <p>21 to him.</p> <p>22 And he's like: You're going -- go in</p> <p>23 the building too because you're going -- you're</p> <p>24 being searched.</p>	Page 68	<p>1 A. No, he was -- no, he was -- he was</p> <p>2 there, but it was other officers also there.</p> <p>3 But Mohammed is the one that searched me.</p> <p>4 Q. Okay. But during the conversation</p> <p>5 that you had with Sergeant Watts outside the</p> <p>6 540 Building, were there other police officers</p> <p>7 present for that particular conversation?</p> <p>8 A. The only person that was -- that I</p> <p>9 remember that was right there was Mohammed.</p> <p>10 Q. Okay. Was Stephanie Watson present</p> <p>11 for that conversation?</p> <p>12 A. She -- I mean, she was -- yeah, she</p> <p>13 was present, but she wasn't -- I mean, she was</p> <p>14 there, but I don't think she -- I don't think</p> <p>15 she heard what we was talking about. But she</p> <p>16 was there because we was just standing there</p> <p>17 talking to each other.</p> <p>18 Q. Okay. Did an officer escort you into</p> <p>19 the 540 Building?</p> <p>20 A. Yes.</p> <p>21 Q. What officer?</p> <p>22 A. Mohammed.</p> <p>23 Q. Okay. Did Officer Mohammed search</p> <p>24 you before or after you entered the</p>
Page 67	<p>1 So I went in the building too. He</p> <p>2 took me in the building too.</p> <p>3 Q. Okay. Before this conversation took</p> <p>4 place outside, did the officers escort anyone</p> <p>5 else into the 540 Building?</p> <p>6 A. Out of -- yeah, but I can't remember</p> <p>7 who it was. It was, like, maybe one other</p> <p>8 person. But they was -- they was mainly trying</p> <p>9 to catch people that was already inside the</p> <p>10 building. It was just that I was, like,</p> <p>11 standing right there not too far from the back</p> <p>12 door.</p> <p>13 Q. And during this conversation that you</p> <p>14 had with Sergeant Watts, were there any other</p> <p>15 police officers present?</p> <p>16 A. Yeah.</p> <p>17 Q. What other officers were present for</p> <p>18 that conversation?</p> <p>19 A. I don't -- I don't think -- Mohammed</p> <p>20 was the only person because Mohammed is the one</p> <p>21 that searched me.</p> <p>22 Q. I'm sorry. I don't think I</p> <p>23 understood you. Mohammed was the only other</p> <p>24 officer present with Sergeant Watts?</p>	Page 69	<p>1 540 Building?</p> <p>2 A. He searched me inside the building.</p> <p>3 Q. Okay. Did you see if Stephanie</p> <p>4 Watson was also taken into the building?</p> <p>5 A. She wasn't.</p> <p>6 Q. Okay. When you were taken into the</p> <p>7 540 Building, were there other individuals that</p> <p>8 the police were holding?</p> <p>9 A. Yes.</p> <p>10 Q. How many other individuals?</p> <p>11 A. Well, at first, it was, like, maybe</p> <p>12 six or seven of us. And then the officers</p> <p>13 brought, like, a few more other guys. I think</p> <p>14 they had -- they must have had ran upstairs or</p> <p>15 something. They had brought them down, too, and</p> <p>16 they lined us up in the hallway.</p> <p>17 Q. Can you describe what the lobby of</p> <p>18 the 540 Building looks like?</p> <p>19 A. The lobby of the -- of 540? It has</p> <p>20 two elevators -- two elevators, two sets of</p> <p>21 stairs, one on each side of the building, and</p> <p>22 maybe, like, six apartments on that floor.</p> <p>23 Q. Okay. And were you taken into the</p> <p>24 lobby of the 540 Building by Mohammed?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 70	<p>1 A. No, we -- they just took -- they just</p> <p>2 took us -- took me into the hallway.</p> <p>3 Q. Okay. The hallway on the first</p> <p>4 floor?</p> <p>5 A. Yes, right when you come in the</p> <p>6 building.</p> <p>7 Q. Okay. Was there anyone else in the</p> <p>8 hallway with you at the time?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. Those five or six other</p> <p>11 individuals that were being held were in the</p> <p>12 hallway as well?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Where -- strike that.</p> <p>15 Were you standing? Were you</p> <p>16 kneeling? Were you sitting in the hallway?</p> <p>17 A. They -- we was on our knees with our</p> <p>18 heads on -- with our hands on our head, and they</p> <p>19 had our head on the wall. Our forehead was on</p> <p>20 the wall, and we were on our knees.</p> <p>21 Q. And how long did you remain in that</p> <p>22 position?</p> <p>23 A. I remained in that position -- I want</p> <p>24 to give you an estimate. Maybe about ten</p>	Page 72	<p>1 you, did he take anything off of your person?</p> <p>2 A. No.</p> <p>3 Q. Okay. Did he take the cash that you</p> <p>4 had in your pockets?</p> <p>5 A. No.</p> <p>6 Q. Were you placed in handcuffs before</p> <p>7 you got on your knees on the ground?</p> <p>8 A. No.</p> <p>9 Q. Okay. After ten minutes of remaining</p> <p>10 in that -- strike that.</p> <p>11 During the ten minutes while you were</p> <p>12 facing the wall in the hallway, did any of the</p> <p>13 officers present say anything to you?</p> <p>14 A. No.</p> <p>15 Q. Okay. Were there officers present in</p> <p>16 the hallway with you at the time?</p> <p>17 A. Yes.</p> <p>18 Q. What officers?</p> <p>19 A. It was -- it was -- it was Watts,</p> <p>20 Mohammed, and maybe, like, three other officers.</p> <p>21 Q. During that --</p> <p>22 A. But they was --</p> <p>23 Q. I'm sorry. Go ahead.</p> <p>24 A. I'm sorry. They -- you know, they</p>
Page 71	<p>1 minutes.</p> <p>2 Q. And what officer placed you on your</p> <p>3 knees facing the wall in the hallway?</p> <p>4 A. Watts.</p> <p>5 Q. Okay. So Mohammed escorts you into</p> <p>6 the building, correct?</p> <p>7 A. Mm-hm.</p> <p>8 Q. And then --</p> <p>9 MR. FLAXMAN: You have to say "yes."</p> <p>10 BY THE WITNESS:</p> <p>11 A. Yes. I'm sorry.</p> <p>12 BY MS. WEST:</p> <p>13 Q. Thank you.</p> <p>14 And then, at some point, Sergeant</p> <p>15 Watts tells you to get on your knees? How does</p> <p>16 that happen?</p> <p>17 A. They -- Mohammed walked us in --</p> <p>18 walked me in the building. It was already guys</p> <p>19 that was already -- that they already had on</p> <p>20 their knees.</p> <p>21 When he walked me in the building,</p> <p>22 Mohammed searched me and -- and made me get</p> <p>23 up -- get down on my knees with the other guys.</p> <p>24 Q. So when Officer Mohammed searched</p>	Page 73	<p>1 were, like, coming back and forth, you know.</p> <p>2 They -- you know, they'll, like, go out -- I</p> <p>3 guess they was running people's IDs, running</p> <p>4 people's names for warrants or whatever. So</p> <p>5 they would, like, come back -- you know, come in</p> <p>6 and out.</p> <p>7 Q. And why do you think they were</p> <p>8 running people's names or IDs?</p> <p>9 A. To see if they had warrants.</p> <p>10 Q. No. I'm saying how do you know that</p> <p>11 they were running people's names or IDs?</p> <p>12 A. Oh, because I -- they was -- they</p> <p>13 was -- you know, they was asking people for</p> <p>14 their ID, asking them if they had any ID on them</p> <p>15 or asking them what their name was.</p> <p>16 Q. Did any officer ask you for your ID</p> <p>17 or your name?</p> <p>18 A. Yeah.</p> <p>19 Q. What officer asked you?</p> <p>20 A. I think it was -- I don't know which</p> <p>21 one it was, but one of them asked me for my ID.</p> <p>22 Q. Did you provide that officer with an</p> <p>23 ID?</p> <p>24 A. Yes.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 74

1 **Q. Okay. Well, what happened after you**
2 **provided the officer with an ID?**
3 A. I gave him my ID, and he -- he took
4 it outside to the car.
5 **Q. And did the officer ultimately return**
6 **to the hallway where you were?**
7 A. Yes.
8 **Q. Okay. And you don't recall which**
9 **officer that was?**
10 A. No.
11 **Q. Okay. What happened when that**
12 **officer returned with your ID?**
13 A. He gave -- well, whoever ID that he
14 had, he gave them back to us.
15 **Q. Okay. So that officer returned your**
16 **ID to you, correct?**
17 A. Mm-hm. Yes.
18 **Q. Did you have any conversation with**
19 **the individuals that were lined up in the**
20 **hallway with you while you were waiting that ten**
21 **minutes?**
22 A. No.
23 **Q. Did you recognize -- I'm sorry. Go**
24 **ahead.**

Page 75

1 A. No, they told us not to -- not to
2 talk.
3 **Q. Did you recognize any of those other**
4 **individuals that were in the hallway with you?**
5 A. A few -- a couple of them, I -- yeah.
6 **Q. What were the names or nicknames of**
7 **those individuals you recognized?**
8 A. I don't remember. I don't remember
9 exactly because they -- you know, I -- at the
10 time I really couldn't see who -- who was down
11 on their knees because I was really just really
12 more so concerned about me.
13 So, I mean, I know -- you know, I
14 knew them, but I just -- I couldn't tell you who
15 exactly was in there with me.
16 **Q. At some point in time, were you**
17 **allowed to stand up?**
18 A. Yes.
19 **Q. What officer told you or allowed you**
20 **to stand up?**
21 A. Watts.
22 **Q. Okay. What did Watts say to you?**
23 A. He -- well, he -- he asked my -- he
24 didn't -- he wasn't really talking to me, but he

Page 76

1 was talking to Mohammed, and he was -- he asked
2 Mohammed had he searched me. And Mohammed said
3 yeah.
4 **Q. And did Watts say anything in**
5 **response to Mohammed confirming he had searched**
6 **you?**
7 A. Yes.
8 **Q. What did he say?**
9 A. He said: Search him again.
10 **Q. Okay. Were any other -- any of the**
11 **other officers present for that conversation**
12 **that Watts and Mohammed had with each other in**
13 **your presence?**
14 A. I don't remember.
15 **Q. Okay. What happened after Watts told**
16 **Mohammed to search you again?**
17 A. He -- after he told me -- after he
18 told him search me again, I stood up, he
19 searched me again, and then he put me back on my
20 knees.
21 **Q. Okay. Did Mohammed take anything off**
22 **you at that point in time when he searched you**
23 **for the second time?**
24 A. No.

Page 77

1 **Q. Okay. You still had the cash in your**
2 **pocket?**
3 A. Yes.
4 **Q. How much longer did you remain on**
5 **your knees in the hallway after Mohammed**
6 **searched you a second time?**
7 A. Maybe, about, like, five to seven
8 minutes because then they started letting people
9 go.
10 **Q. Okay. And --**
11 A. -- if they didn't have -- if they
12 didn't have no warrants or anything on them,
13 they was letting people go.
14 **Q. During that five to seven minutes,**
15 **did you have any conversation with any of the**
16 **officers that were present?**
17 A. Not at that time, no.
18 **Q. Okay. Do you recall the names or**
19 **nicknames of the individuals that they were**
20 **letting go?**
21 A. Like I said, I -- you know, I really
22 couldn't -- didn't see who it was because I had
23 my head against the wall.
24 **Q. Okay. At some point in time, did an**

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 78	<p>1 officer come back -- officer or officers come</p> <p>2 back and tell you what was happening with you?</p> <p>3 A. No, they -- no, they were conversing</p> <p>4 amongst themselves. So --</p> <p>5 Q. And when you say "they," what</p> <p>6 officers are you referring to?</p> <p>7 A. Well, I'm -- well, Officer Mohammed</p> <p>8 and Watts, they was -- they was conversing with</p> <p>9 the other officers, you know. I couldn't hear</p> <p>10 what they were saying or whatever.</p> <p>11 Q. Okay. At some point in time, were</p> <p>12 you able to get up off your knees?</p> <p>13 A. Yeah.</p> <p>14 Q. Okay. How did you know you were able</p> <p>15 to get up from the ground?</p> <p>16 A. Because Watts was like: Man, stand</p> <p>17 up.</p> <p>18 I was the last person. I was the</p> <p>19 last person to -- you know, that was left in the</p> <p>20 hallway.</p> <p>21 Q. Okay. So Watts tells you to get up?</p> <p>22 A. Yes.</p> <p>23 Q. Did you stand up?</p> <p>24 A. Yes.</p>
Page 79	<p>1 Q. And what happened after that?</p> <p>2 A. It was, like -- it was some -- it</p> <p>3 was, like, some drugs was on the ground. When I</p> <p>4 stood up, it was, like, some drugs that were on</p> <p>5 the ground. And Watts was like: That's your</p> <p>6 shit.</p> <p>7 I'm like: That's not mine.</p> <p>8 He's like: Yes, it is.</p> <p>9 And then he -- that's when he --</p> <p>10 that's when he slapped me after he -- I'm like:</p> <p>11 Man, what you slap me for? I just told you that</p> <p>12 ain't mine.</p> <p>13 He's like: You lying, motherfucker.</p> <p>14 I'm like: Man, that ain't mine. He</p> <p>15 just searched me twice. You know that ain't</p> <p>16 mine.</p> <p>17 Q. And when you stood up and the drugs</p> <p>18 were on the ground, where specifically were the</p> <p>19 drugs in relation to you in the hallway?</p> <p>20 A. I don't know; like, a couple feet, I</p> <p>21 guess.</p> <p>22 Q. And when Watts told you that they</p> <p>23 were yours, what other police officers were</p> <p>24 present?</p>
Page 80	<p>1 A. All of -- mostly all of them, I</p> <p>2 guess. That's most of -- because they hadn't</p> <p>3 left. All of them didn't leave. So they was</p> <p>4 all -- they was -- they was there. I was the</p> <p>5 only person left in the hallway with the</p> <p>6 other -- with Sergeant Watts and Mohammed and,</p> <p>7 like, maybe two or three other officers.</p> <p>8 Q. Okay. So all the other citizens had</p> <p>9 left the hallway at this point in time?</p> <p>10 A. Pardon me?</p> <p>11 Q. All the other citizens had left the</p> <p>12 building --</p> <p>13 A. Yes.</p> <p>14 Q. -- at that point in -- or I'm</p> <p>15 sorry -- the hallway at that point in time?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And you said Watts slapped</p> <p>18 you; is that correct?</p> <p>19 A. Yeah. Yeah.</p> <p>20 Q. He slapped you across the face?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. He slapped you on the right</p> <p>23 side or the left side of your face?</p> <p>24 A. Right.</p>
Page 81	<p>1 Q. Did you have glasses on that day,</p> <p>2 sir?</p> <p>3 A. Yes.</p> <p>4 Q. Did your glasses remain on your face</p> <p>5 when you were slapped?</p> <p>6 A. Nope.</p> <p>7 Q. They fell off?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Were you able to pick up your</p> <p>10 glasses and put them back on?</p> <p>11 A. Yeah.</p> <p>12 Q. Any damage to your glasses as a</p> <p>13 result of being slapped?</p> <p>14 A. Yeah, an arm had broke.</p> <p>15 Q. Okay. What side of your glasses had</p> <p>16 the arm broken on?</p> <p>17 A. I think it was the -- the right side.</p> <p>18 Q. Okay. Did you have any visible</p> <p>19 injuries or marks on your face as a result of</p> <p>20 the slap?</p> <p>21 A. No.</p> <p>22 Q. Okay. After this conversation took</p> <p>23 place with you and Officer -- I'm sorry -- with</p> <p>24 Sergeant Watts, were you taken out of the</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 82</p> <p>1 building?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Prior to being taken out of</p> <p>4 the building, were you placed in handcuffs?</p> <p>5 A. Yes.</p> <p>6 Q. Who placed you in handcuffs?</p> <p>7 A. Mohammed.</p> <p>8 Q. And when he placed you in handcuffs,</p> <p>9 were you still in that hallway?</p> <p>10 A. Yes.</p> <p>11 Q. Did any officer search you a third</p> <p>12 time?</p> <p>13 A. No.</p> <p>14 Q. Did anybody -- any officer ever take</p> <p>15 that money out of your pocket?</p> <p>16 A. They took it out, but it -- they put</p> <p>17 it right back in because it wasn't a whole lot</p> <p>18 of money. It was just --</p> <p>19 Q. What officer -- I'm sorry. Go ahead.</p> <p>20 A. It was only a few dollars, so they</p> <p>21 just put it back in my pocket.</p> <p>22 Q. Okay. What officer took the money</p> <p>23 out of your pocket and put it back in?</p> <p>24 A. Mohammed.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. Yeah, I talked to them.</p> <p>2 Q. What did you say to them?</p> <p>3 A. I'm like: Man, why he -- man -- I</p> <p>4 said: Why he put me -- why he put that stuff on</p> <p>5 me, man? He know that's -- he know that ain't</p> <p>6 mine.</p> <p>7 He was like: Man, I ain't got</p> <p>8 nothing to do with -- it was -- they didn't --</p> <p>9 their response was, like, they didn't, you</p> <p>10 know -- they didn't -- what could they say, you</p> <p>11 know? As far as they know, this what -- that's</p> <p>12 what I'm being transported to station for.</p> <p>13 Q. I'm going to show you a document that</p> <p>14 we'll mark as Individual Defendants' Exhibit 1.</p> <p>15 MS. WEST: And, Joel, this is actually the</p> <p>16 mugshot.</p> <p>17 MR. FLAXMAN: Oh, okay.</p> <p>18 MS. WEST: So I'll show it on the screen.</p> <p>19 MR. FLAXMAN: Great.</p> <p>20 MS. WEST: For the record, it's</p> <p>21 CITY-BG-51604 through 51606.</p> <p>22 (WHEREUPON, Individual Defendants'</p> <p>23 Exhibit No. 1 was presented to the</p> <p>24 witness.)</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. Was that the first time or the second</p> <p>2 time he searched you?</p> <p>3 A. That was the second time.</p> <p>4 Q. Okay. Who escorted you out of the</p> <p>5 building?</p> <p>6 A. Mohammed.</p> <p>7 Q. Were you ultimately placed in a car,</p> <p>8 placed --</p> <p>9 A. Yes.</p> <p>10 Q. -- in a vehicle?</p> <p>11 A. Yes.</p> <p>12 Q. Was -- who was the driver of that</p> <p>13 vehicle?</p> <p>14 A. One of the other officers was the</p> <p>15 driver of the vehicle.</p> <p>16 Q. Was there another officer in the --</p> <p>17 the vehicle with you other than the driver?</p> <p>18 A. Yes, it was -- it was two officers.</p> <p>19 Q. Okay. Any other citizens in the car</p> <p>20 with you?</p> <p>21 A. No, ma'am.</p> <p>22 Q. Did you have any conversation with</p> <p>23 those officers when you were transported to the</p> <p>24 police station?</p>	<p style="text-align: right;">Page 85</p> <p>1 BY MS. WEST:</p> <p>2 Q. Okay, Mr. Blair. Can you see a</p> <p>3 document that's appearing on your screen now?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Let me just scroll down here.</p> <p>6 Do you see this front view, sir?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Is that you?</p> <p>9 A. Yes.</p> <p>10 Q. You have your glasses on, correct?</p> <p>11 A. I do.</p> <p>12 Q. Okay. Were the glasses -- when you</p> <p>13 said they were broken, you were still able to</p> <p>14 wear them?</p> <p>15 A. Pardon me?</p> <p>16 Q. You indicated earlier that your</p> <p>17 glasses broke --</p> <p>18 A. Yeah.</p> <p>19 Q. -- as a result of being slapped.</p> <p>20 A. Right.</p> <p>21 Q. You were still able to keep them on</p> <p>22 your face?</p> <p>23 A. Yeah, I like -- I like bent the arm</p> <p>24 back -- back up, like, so they would sit -- you</p>

25 (Pages 82 to 85)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 86</p> <p>1 know, sit on my nose.</p> <p>2 Q. Okay. All right. That's all I have</p> <p>3 for you with that one.</p> <p>4 Where did the police transport you,</p> <p>5 what station?</p> <p>6 A. 51st and -- 51st and, what is that,</p> <p>7 State -- Federal.</p> <p>8 Q. 51st and Wentworth?</p> <p>9 A. Yeah, Wentworth. Yeah, that's it,</p> <p>10 Wentworth. Mm-hm.</p> <p>11 Q. Had you been to that police station</p> <p>12 before that date?</p> <p>13 A. Yes, I been there before.</p> <p>14 Q. Okay. Once you arrived at the police</p> <p>15 station, did the officers who drove the vehicle</p> <p>16 escort you in?</p> <p>17 A. No, just only the officers that</p> <p>18 brought me -- that brought me -- that brought me</p> <p>19 to the station. Those were the ones that</p> <p>20 escorted me into the station.</p> <p>21 Q. Okay. So the driver and the</p> <p>22 passenger --</p> <p>23 A. Right.</p> <p>24 Q. -- police officers are the ones that</p>	<p style="text-align: right;">Page 88</p> <p>1 being charged with, and he told me.</p> <p>2 Q. Okay. Is that an officer that you</p> <p>3 encountered in -- while you were going into</p> <p>4 lockup?</p> <p>5 A. That's the officer that's already --</p> <p>6 yeah, he's the -- he's present. He's -- when</p> <p>7 you go in lockup, he's the one that, you know,</p> <p>8 that -- he searches you again and, you know,</p> <p>9 strip you and all that stuff and then he puts</p> <p>10 you in the holding cell.</p> <p>11 Q. Okay. Do you know the name of that</p> <p>12 officer?</p> <p>13 A. No.</p> <p>14 Q. And what did you -- did you say</p> <p>15 anything to the officer when they told you what</p> <p>16 you were being charged with?</p> <p>17 A. No.</p> <p>18 Q. Okay. You didn't tell anyone in</p> <p>19 lockup or any officer at the station that you</p> <p>20 didn't have any drugs on you?</p> <p>21 A. No, not -- no, I didn't at that time,</p> <p>22 no.</p> <p>23 Q. Okay. And you were being charged</p> <p>24 with possession?</p>
<p style="text-align: right;">Page 87</p> <p>1 escorted you into the building?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Did you have any additional</p> <p>4 conversation with those officers as you were</p> <p>5 being escorted into the police station?</p> <p>6 A. No, not that I recall.</p> <p>7 Q. When you got to the police station,</p> <p>8 where were you taken?</p> <p>9 A. Where they -- where they prepare you</p> <p>10 for lockup.</p> <p>11 Q. Okay. Did you have -- before you</p> <p>12 went to lockup, did you have any conversation</p> <p>13 with any of the officers that were present at</p> <p>14 the 540 Building?</p> <p>15 A. No.</p> <p>16 Q. Did anyone ever tell you what you</p> <p>17 were being charged with?</p> <p>18 A. Yes.</p> <p>19 Q. Who told you what you were being</p> <p>20 charged with?</p> <p>21 A. The guy -- the officer that's -- the</p> <p>22 officer that, you know, strips you down and</p> <p>23 makes sure you don't have nothing -- no weapons</p> <p>24 and stuff on you. He -- I asked him what was I</p>	<p style="text-align: right;">Page 89</p> <p>1 A. Yes.</p> <p>2 Q. How long were you in lockup before</p> <p>3 you were transported to Cook County Jail?</p> <p>4 A. Overnight.</p> <p>5 Q. Sir, Stephanie Watson, how long had</p> <p>6 you known her at the time of your arrest in July</p> <p>7 of 2004?</p> <p>8 A. Maybe ten years.</p> <p>9 Q. How did you first come to know</p> <p>10 Ms. Watson? Did she live in the area?</p> <p>11 A. Yes.</p> <p>12 Q. And did you ever use drugs with</p> <p>13 Ms. Watson?</p> <p>14 A. Yes.</p> <p>15 Q. And Double R, do you know that</p> <p>16 individual's government name?</p> <p>17 A. No, I don't. I know his first name</p> <p>18 is Reggie, but I don't know his last name.</p> <p>19 Q. And at the time of your arrest in</p> <p>20 2004, how long had you known Double R or Reggie?</p> <p>21 A. Maybe about 10 or 12 years, something</p> <p>22 like that.</p> <p>23 Q. And did he -- did he live in the</p> <p>24 Ida B. Wells complex?</p>

26 (Pages 86 to 89)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 90	Page 92
<p>1 A. Did I live in Ida --</p> <p>2 Q. Did Double R live --</p> <p>3 A. Oh, yes. Yes.</p> <p>4 Q. Do you know where he lived?</p> <p>5 A. No.</p> <p>6 Q. Did he live in the 540 Building in</p> <p>7 July of 2004?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you ever use drugs with</p> <p>10 him?</p> <p>11 A. No.</p> <p>12 Q. Did you ever sell drugs with him?</p> <p>13 A. Yes.</p> <p>14 Q. You were transferred into Cook County</p> <p>15 Jail the next day, correct?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Were you appointed a public defender</p> <p>18 for your case?</p> <p>19 A. Yes.</p> <p>20 Q. Do you recall if it was a man or a</p> <p>21 woman?</p> <p>22 A. I think it was a man, if I'm not</p> <p>23 mistaken.</p> <p>24 Q. Do you recall the first time you met</p>	<p>1 A. We ultimately -- we had a</p> <p>2 402 conference, and we had a motion to suppress</p> <p>3 evidence.</p> <p>4 Q. Okay. And the motion to suppress</p> <p>5 evidence, there was a hearing, correct?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Okay. Were you present for that</p> <p>8 hearing?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Did you yourself testify at</p> <p>11 that hearing?</p> <p>12 A. Pardon me? I didn't hear you.</p> <p>13 Q. Did you yourself testify at that</p> <p>14 hearing?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Okay. Did an officer testify at that</p> <p>17 hearing?</p> <p>18 A. I think so.</p> <p>19 Q. Okay. Did more than one officer</p> <p>20 testify at the motion to suppress hearing?</p> <p>21 A. No, I think it was only one.</p> <p>22 Q. Okay. The officer that testified at</p> <p>23 the hearing, did you recognize that same officer</p> <p>24 to be present at your July 10, 2004 arrest?</p>
Page 91	Page 93
<p>1 with that attorney?</p> <p>2 A. Yeah, the first time was -- the first</p> <p>3 time I met with him was after -- not the -- not</p> <p>4 the time, like, when you first get to the County</p> <p>5 jail. I met with him, like, the second time I</p> <p>6 went to court on that case.</p> <p>7 Q. Okay. And the second time you went</p> <p>8 to court when you met your public defender, did</p> <p>9 you have an opportunity to speak with them?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Did you tell your attorney</p> <p>12 that you didn't have any drugs on you on</p> <p>13 July 10, 2004, when you were arrested?</p> <p>14 A. Yes.</p> <p>15 Q. What did your attorney say in</p> <p>16 response to that?</p> <p>17 A. He asked me did I want to fight this</p> <p>18 case, and I was like: Yeah.</p> <p>19 And he was like: Well, you know,</p> <p>20 what we can do is we can maybe have a</p> <p>21 402 conference or file a motion or -- or, you</p> <p>22 know, we'll see what -- what happens after that.</p> <p>23 Q. Okay. And what did you and your</p> <p>24 attorney ultimately decide to do?</p>	<p>1 A. Yes.</p> <p>2 Q. Okay. Did you learn that officer's</p> <p>3 name at the motion to suppress hearing?</p> <p>4 A. I didn't know his name at the time,</p> <p>5 no, I didn't.</p> <p>6 Q. Do you know that officer's name</p> <p>7 today?</p> <p>8 A. I think it was Officer Jones, I</p> <p>9 think.</p> <p>10 Q. Okay.</p> <p>11 A. I think it was Officer Jones, yeah.</p> <p>12 Q. And when did you learn that that</p> <p>13 officer's name was Officer Jones?</p> <p>14 A. At the -- at the -- when I got ready</p> <p>15 to hear the -- hear my motion, the public</p> <p>16 defender told me that the officer was there.</p> <p>17 Q. Who told you?</p> <p>18 A. My public defender.</p> <p>19 Q. Oh, okay. So you heard that officer</p> <p>20 testify at the motion to suppress, correct?</p> <p>21 A. I didn't -- I didn't hear him. I</p> <p>22 didn't hear him when they -- what he -- what he</p> <p>23 said verbatim. So I couldn't tell you what he</p> <p>24 said.</p>

27 (Pages 90 to 93)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 94</p> <p>1 Q. Were you present in the courtroom at 2 the time that the officer testified at your 3 suppression hearing? 4 A. No. 5 Q. Okay. 6 A. I think I was in the -- in the 7 courtroom lockup. 8 Q. How long -- strike that. 9 Did you ultimately enter into a plea 10 deal for your case? 11 A. No, the judge offered -- offered me 12 three years; but at the time, I thought I was 13 going to be able to beat the case because I knew 14 I was innocent. 15 Q. When did the judge offer you three 16 years? 17 A. After -- after I heard -- after I 18 heard the motion. 19 Q. Same question -- 20 A. No -- strike that. Strike that. 21 Before I heard the motion, before 22 I -- I'm sorry. Before I heard the motion, she 23 offered me three years. That's -- 24 Q. Was it the same day of the</p>	<p style="text-align: right;">Page 96</p> <p>1 been going before you took a plea deal for four 2 years? 3 A. A year. Yeah, a year. 4 Q. Okay. And were you in Cook County 5 Jail that entire time? 6 A. Yes. 7 Q. At any point in time, did you ever 8 tell the judge that you didn't have drugs on you 9 on the date of your arrest? 10 A. No, I didn't. 11 Q. Okay. Following your arrest, where 12 in Cook County Jail were you housed, what 13 division? 14 A. Division 1. 15 Q. Okay. Did you go through withdrawal 16 as a result of being incarcerated and unable to 17 use heroin? 18 A. Yes. 19 Q. Okay. While you were at Cook County 20 Jail, did you receive any type of treatment to 21 help with the withdrawal symptoms? 22 A. Yes. 23 Q. Okay. What did they do for you? 24 A. They gave me some kind of medicine.</p>
<p style="text-align: right;">Page 95</p> <p>1 suppression hearing that -- 2 A. No, I -- 3 Q. -- the Court offered you -- 4 A. No, no, it was before we heard the 5 motion. 6 Q. Okay. So a different court date? 7 A. Yeah, it was a different court date. 8 Q. And you turned down that offer? 9 A. Yes. 10 Q. Okay. What happened with the case 11 ultimately? 12 A. Well, my -- the judge denied my -- 13 she denied my motion. 14 Q. Okay. And did you enter into a plea 15 after that? 16 A. I don't know. Once she -- once she 17 denied my motion, the three was off the table. 18 So, you know, it was -- I was looking at 4 to 19 15. 20 Q. Okay. And, ultimately, what happened 21 with the case? 22 A. Ultimately, I just went on ahead and 23 copped out for the four. 24 Q. Okay. And how long had your case</p>	<p style="text-align: right;">Page 97</p> <p>1 They gave me some kind of medicine. Then they 2 gave me, like, some green -- some green liquid 3 stuff. 4 Q. Okay. How long were you -- how long 5 did you take the medication while you were at 6 Cook County Jail? 7 A. Maybe about -- about three weeks. 8 Q. Did you participate in any substance 9 abuse programming while you were in Cook County 10 Jail? 11 A. No, not -- not for this case. 12 Q. Okay. For other cases that you've 13 had, you participated in a substance abuse 14 program while in custody? 15 A. Yes. 16 Q. Okay. Did you go to any other 17 division while you were housed at Cook County 18 Jail? 19 A. No. 20 Q. Okay. You stayed in Division 1 the 21 entire time? 22 A. Yes. 23 Q. Okay. Were you evaluated by TASC 24 while you were incarcerated at Cook County Jail?</p>

28 (Pages 94 to 97)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 98	<p>1 A. Yes.</p> <p>2 Q. What did that evaluation consist of?</p> <p>3 A. It consisted of if they would -- if I</p> <p>4 wanted to see if I wanted to take TASC probation</p> <p>5 or -- or they -- they basically just gave me an</p> <p>6 evaluation.</p> <p>7 Q. Okay. Do you know what the results</p> <p>8 were of that evaluation?</p> <p>9 A. No, not really. I can't remember.</p> <p>10 Q. Do you know if TASC determined if</p> <p>11 you'd benefit from any -- from any type of drug</p> <p>12 treatment?</p> <p>13 A. I -- pardon -- could you repeat that?</p> <p>14 Q. Sure. Do you know if TASC determined</p> <p>15 whether or not you would benefit from any type</p> <p>16 of drug treatment?</p> <p>17 A. I think they would -- yeah, I</p> <p>18 believe -- yeah.</p> <p>19 Q. When you were ultimately transferred</p> <p>20 to the Illinois Department of Corrections, did</p> <p>21 you participate in drug treatment?</p> <p>22 A. No.</p> <p>23 Q. Okay. When you were incarcerated in</p> <p>24 July of 2004 in Cook County Jail, this wasn't</p>	Page 100	<p>1 altercation?</p> <p>2 A. No.</p> <p>3 Q. Were you disciplined as a result of</p> <p>4 the physical altercation?</p> <p>5 A. Yeah, they took us to the hole.</p> <p>6 Q. Okay. Other than that one time that</p> <p>7 you spent time in segregation, did you spend</p> <p>8 time -- any other time in segregation while you</p> <p>9 were in Cook County Jail following the 2004</p> <p>10 arrest?</p> <p>11 A. No.</p> <p>12 Q. Did you seek any mental health</p> <p>13 treatment while you were incarcerated following</p> <p>14 your 2004 arrest in Cook County Jail?</p> <p>15 A. No.</p> <p>16 Q. Did you seek any medical treatment</p> <p>17 for anything while you were incarcerated in Cook</p> <p>18 County Jail following your 2004 arrest?</p> <p>19 A. No.</p> <p>20 Q. Do you recall when you were</p> <p>21 ultimately transferred to the Illinois</p> <p>22 Department of Corrections?</p> <p>23 A. Yeah, I -- yeah, I remember that.</p> <p>24 Q. What was the date?</p>
Page 99	<p>1 your first time in the Cook County Jail,</p> <p>2 correct?</p> <p>3 A. No, it wasn't -- no, it wasn't my</p> <p>4 first time.</p> <p>5 Q. Okay. While you were incarcerated</p> <p>6 following your July 2004 arrest in Cook County</p> <p>7 Jail, did -- were you involved in any physical</p> <p>8 altercations?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Did any of those physical</p> <p>11 altercations end in physical injury to you?</p> <p>12 A. Not -- not whereas I had to go to the</p> <p>13 hospital or anything, no. It was just a regular</p> <p>14 fight.</p> <p>15 Q. Who did you get in a fight with?</p> <p>16 A. One of the -- one of the guys that</p> <p>17 was on my deck. We was playing cards, and he</p> <p>18 was trying to cheat.</p> <p>19 Q. So what happened?</p> <p>20 A. I called him out and we went into the</p> <p>21 bathroom and we fought.</p> <p>22 Q. Okay. Did you seek any type of</p> <p>23 medical treatment as a result of any injuries</p> <p>24 that you might have received from that physical</p>	Page 101	<p>1 A. I can't give you that exact date, but</p> <p>2 I do remember being transferred to the IDOC,</p> <p>3 though. But I can't give you -- I don't</p> <p>4 remember that, the actual date.</p> <p>5 Q. All right, Mr. Blair. I'd like to</p> <p>6 take a five-minute break.</p> <p>7 A. Okay.</p> <p>8 MS. WEST: Thank you.</p> <p>9 THE VIDEOGRAPHER: The time is now 12:17.</p> <p>10 This is the end of Media 2. We're off the</p> <p>11 record.</p> <p>12 (WHEREUPON, a recess was had.)</p> <p>13 THE VIDEOGRAPHER: The time is now</p> <p>14 12:27 p.m. This is the beginning of Media 3.</p> <p>15 We're back on the record.</p> <p>16 BY MS. WEST:</p> <p>17 Q. Mr. Blair, when you were first</p> <p>18 transferred to the Illinois Department of</p> <p>19 Corrections, what facility did you go to?</p> <p>20 A. NRC.</p> <p>21 Q. Okay. Then where did you go after</p> <p>22 that?</p> <p>23 A. I went -- I think I went to Vienna.</p> <p>24 Q. How long were you at Vienna?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 102</p> <p>1 A. I think I was there, like, six</p> <p>2 months.</p> <p>3 Q. Were you transferred to any facility</p> <p>4 after Vienna?</p> <p>5 A. Yeah, I believe so. I think I was</p> <p>6 transferred to East Moline.</p> <p>7 Q. And how long did you stay at East</p> <p>8 Moline?</p> <p>9 A. About -- I think I stayed there</p> <p>10 maybe, like, two extra months.</p> <p>11 Q. How long were you ultimately -- or</p> <p>12 strike that.</p> <p>13 How long did you ultimately serve in</p> <p>14 the Illinois Department of Corrections?</p> <p>15 A. Ultimately, I did 18 months all</p> <p>16 together.</p> <p>17 Q. Okay.</p> <p>18 A. So I think I did almost, like, a year</p> <p>19 in County, and the rest was IDOC time.</p> <p>20 Q. Do you recall the date or month that</p> <p>21 you got out of the Illinois Department of</p> <p>22 Corrections?</p> <p>23 A. I -- I don't remember the exact date,</p> <p>24 no.</p>	<p style="text-align: right;">Page 104</p> <p>1 You didn't participate in</p> <p>2 substance-abuse treatment while you were in the</p> <p>3 Illinois Department of Corrections?</p> <p>4 A. No, I didn't. Not at that time, no.</p> <p>5 Q. Mr. Blair, have you been awarded a</p> <p>6 sum of money by the court of claims related to</p> <p>7 your conviction being vacated?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. When were you awarded money?</p> <p>10 A. I think -- I think, 2018. I think --</p> <p>11 Q. And how much --</p> <p>12 A. -- 2018.</p> <p>13 Q. And how much money were you awarded?</p> <p>14 A. 30,000.</p> <p>15 Q. What did you do with the 30,000 that</p> <p>16 you were awarded?</p> <p>17 A. You said what did I do?</p> <p>18 Q. Yes, what did you do with the money?</p> <p>19 A. Okay. I gave my son and daughter</p> <p>20 some of -- some of it. Of course, I had my --</p> <p>21 gave my mother some money. And I bought me a</p> <p>22 car.</p> <p>23 Q. Mr. Blair, how many felony</p> <p>24 convictions do you have?</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. Okay. What was your classification</p> <p>2 when you were in the Illinois Department of</p> <p>3 Corrections following the July 2004 arrest?</p> <p>4 A. My classification was a nonviolent</p> <p>5 offender.</p> <p>6 Q. Okay. This wasn't your first time in</p> <p>7 the Illinois Department of Corrections, correct?</p> <p>8 A. Correct.</p> <p>9 Q. While you were serving those</p> <p>10 18 months in the Illinois Department of</p> <p>11 Corrections, were you involved in any physical</p> <p>12 altercations?</p> <p>13 A. Just -- no, not in IDOC, no.</p> <p>14 Q. Okay. Did you seek any mental health</p> <p>15 treatment while you were incarcerated in the</p> <p>16 Illinois Department of Corrections following the</p> <p>17 July 2004 arrest?</p> <p>18 A. No.</p> <p>19 Q. Did you seek any medical treatment</p> <p>20 while you were housed in the Illinois Department</p> <p>21 of Corrections following the July 2004 arrest?</p> <p>22 A. No.</p> <p>23 Q. And I'm sorry. I think I asked this</p> <p>24 earlier.</p>	<p style="text-align: right;">Page 105</p> <p>1 A. I think I have seven.</p> <p>2 Q. And of those seven, sir, how many are</p> <p>3 drug-related?</p> <p>4 A. Mostly all of them.</p> <p>5 Q. When you were living in Minneapolis,</p> <p>6 were you arrested at all?</p> <p>7 A. Yes.</p> <p>8 Q. Were you arrested more than once or</p> <p>9 just one time?</p> <p>10 A. Maybe -- yeah, I think I -- I was</p> <p>11 arrested more than one time.</p> <p>12 Q. Okay. Tell me about the first time</p> <p>13 you were arrested in Minneapolis. Do you recall</p> <p>14 the year?</p> <p>15 A. You said tell you about the first</p> <p>16 time I was arrested?</p> <p>17 Q. Let me ask it this way: What was the</p> <p>18 year of the first arrest when you lived in</p> <p>19 Minneapolis?</p> <p>20 A. I don't remember what year it was.</p> <p>21 Q. Do you remember how old you were?</p> <p>22 A. I don't even know how old I was. I</p> <p>23 was -- I think I was maybe about 30, 32 or</p> <p>24 something like that, maybe.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 106	<p>1 Q. And what were you arrested for?</p> <p>2 A. Shoplifting.</p> <p>3 Q. What happened in that case?</p> <p>4 A. I did -- I had to do time in what you</p> <p>5 call, like, a work house. It's like a -- sort</p> <p>6 of like the County that's here.</p> <p>7 Q. And did you take a plea deal related</p> <p>8 to that arrest?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Okay. And as a result of the</p> <p>11 plea, you did, like, a work house --</p> <p>12 A. Yeah.</p> <p>13 Q. -- like a boot-camp type of thing?</p> <p>14 A. It's not like boot camp, but it's</p> <p>15 like you go to particular places and maybe,</p> <p>16 like, mow the lawn, mow their grass. You know,</p> <p>17 you go to, like, cemeteries and mow the grass or</p> <p>18 go to parks and mow the grass.</p> <p>19 Q. How long did --</p> <p>20 A. That's --</p> <p>21 Q. Sorry.</p> <p>22 A. -- pretty much it.</p> <p>23 Q. How long did you have to do that?</p> <p>24 A. I think I -- I think I was there,</p>	Page 108	<p>1 A. This is funny. They let me -- they</p> <p>2 let me out, ensuring that I would be a snitch</p> <p>3 for them.</p> <p>4 Q. Okay. And when you say "they," what</p> <p>5 municipality or entity are you referring to?</p> <p>6 A. The officers that arrested me.</p> <p>7 Q. Okay. Were they --</p> <p>8 A. They --</p> <p>9 Q. I'm sorry. Go ahead.</p> <p>10 A. They -- they let me out. They</p> <p>11 were -- they let me out because they thought I</p> <p>12 would be a snitch for them.</p> <p>13 Q. Okay. Was it County police, State</p> <p>14 police?</p> <p>15 A. No. It was regular City police.</p> <p>16 Q. So how many days were you in jail</p> <p>17 before they let you out with the deal that you</p> <p>18 would act as a snitch?</p> <p>19 A. I was -- like, maybe a couple of</p> <p>20 days. Like, maybe two days.</p> <p>21 Q. Okay. And did you act as a snitch or</p> <p>22 an informant for the police as a result of being</p> <p>23 let out?</p> <p>24 A. No, I -- I didn't do it.</p>
Page 107	<p>1 like, eight months I think.</p> <p>2 Q. Was that a misdemeanor or a felony?</p> <p>3 A. I think that was a misdemeanor, if</p> <p>4 I'm not mistaken.</p> <p>5 Q. And you were arrested another time</p> <p>6 while you lived in Minneapolis?</p> <p>7 A. Yeah, I was arrested another time.</p> <p>8 Q. Okay. Do you recall the year of the</p> <p>9 second arrest?</p> <p>10 A. No, I don't recall the year. I don't</p> <p>11 remember what year it was.</p> <p>12 Q. Do you recall how old you were at the</p> <p>13 time of the second arrest in Minneapolis?</p> <p>14 A. Oh, let's see. Maybe my early 30s, I</p> <p>15 think.</p> <p>16 Q. And what were you arrested for?</p> <p>17 A. I was arrested for -- for heroin.</p> <p>18 Q. Possession?</p> <p>19 A. Yes.</p> <p>20 Q. And you were still using heroin when</p> <p>21 you lived in Minneapolis, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. What happened to -- to that</p> <p>24 arrest?</p>	Page 109	<p>1 Q. Okay. Was there any ramifications</p> <p>2 for not participating with the police?</p> <p>3 A. No, it wasn't because I left. When</p> <p>4 they let me out, I left and came back to</p> <p>5 Chicago.</p> <p>6 Q. How long after you made that deal did</p> <p>7 you come back to Chicago?</p> <p>8 MR. FLAXMAN: Objection, form.</p> <p>9 You can go ahead and answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't -- I don't really remember</p> <p>12 how long it was. It could have been maybe a</p> <p>13 month or maybe a little bit more than a month.</p> <p>14 BY MS. WEST:</p> <p>15 Q. And why was it that the police</p> <p>16 thought that you could act as a snitch for them?</p> <p>17 A. I haven't the slightest idea.</p> <p>18 Q. Were you selling drugs when you lived</p> <p>19 in Minneapolis?</p> <p>20 A. While -- pardon me?</p> <p>21 Q. Were you selling drugs when you lived</p> <p>22 in Minneapolis?</p> <p>23 A. No.</p> <p>24 Q. Any other arrests that you had while</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 110	<p>1 you lived in Minneapolis other than the two that</p> <p>2 we talked about?</p> <p>3 A. No, not that I remember, no.</p> <p>4 Q. Okay. And --</p> <p>5 A. I think that was it.</p> <p>6 Q. And the case -- this heroin</p> <p>7 possession case that you were let out on, did</p> <p>8 they dismiss the charges?</p> <p>9 A. I don't know what they did with the</p> <p>10 charges because it's like -- it never came back</p> <p>11 on me or anything that I remember. So I don't</p> <p>12 know what -- I don't know if it -- because I</p> <p>13 didn't go in front of a judge or anything.</p> <p>14 Q. At the time of that arrest, where in</p> <p>15 Minneapolis did you live?</p> <p>16 A. I didn't -- could you repeat that?</p> <p>17 Q. At the time of that arrest for heroin</p> <p>18 possession, where did you live in Minneapolis?</p> <p>19 A. I lived in Brooklyn -- Brooklyn</p> <p>20 Center -- strike that.</p> <p>21 No, I didn't. I lived in St. Louis</p> <p>22 Park. I'm sorry. I lived in -- I lived in</p> <p>23 St. Louis Park, Minnesota.</p> <p>24 Q. You said St. Louis Park?</p>	Page 112	<p>1 BY MS. WEST:</p> <p>2 Q. Sir, I'm going to scroll down and let</p> <p>3 you take a look at this.</p> <p>4 A. Okay.</p> <p>5 Q. I just want to ask you if you're</p> <p>6 familiar with this document.</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Is this your signature here on</p> <p>9 the second page at the bottom?</p> <p>10 A. Yes, it is.</p> <p>11 Q. Okay. I'm going to go back up to the</p> <p>12 top here.</p> <p>13 Do you see where it says Number 1?</p> <p>14 A. Yes.</p> <p>15 Q. It says: Are you claiming emotional</p> <p>16 damages as a result of the claims in your</p> <p>17 lawsuit? If so, please describe the emotional</p> <p>18 damages.</p> <p>19 The answer that you gave is: Yes,</p> <p>20 being wrongfully imprisoned made me angry and</p> <p>21 frustrated.</p> <p>22 Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. How did being wrongfully imprisoned</p>
Page 111	<p>1 A. Yeah, St. Louis Park. It's like a</p> <p>2 little suburb right out of -- right out of</p> <p>3 mid -- right outside of Minneapolis.</p> <p>4 Q. Sir, in January of 2016, were you</p> <p>5 arrested for possession of heroin?</p> <p>6 A. In January of 2016, no, not that I</p> <p>7 recall, no.</p> <p>8 Q. When was the last arrest that you had</p> <p>9 for possession of heroin?</p> <p>10 A. I don't remember. I don't remember</p> <p>11 what year it was. I know it was some time ago.</p> <p>12 Q. Okay. I'm going to show you a</p> <p>13 document that we'll mark as Individual</p> <p>14 Defendants' Exhibit 2.</p> <p>15 (WHEREUPON, Individual Defendants'</p> <p>16 Exhibit No. 2 was presented to the</p> <p>17 witness.)</p> <p>18 BY MS. WEST:</p> <p>19 Q. All right. Sir, can you see a</p> <p>20 document up on the screen?</p> <p>21 A. Yes, ma'am.</p> <p>22 MS. WEST: All right. For the record,</p> <p>23 these are Plaintiff Harvey Blair's answers to</p> <p>24 April 14, 2020 interrogatories.</p>	Page 113	<p>1 make you angry?</p> <p>2 A. It made me angry because I felt like</p> <p>3 I should -- I hadn't done -- I hadn't done</p> <p>4 anything. I didn't even get caught with</p> <p>5 anything. And I was just kind of, like -- I was</p> <p>6 mad at the situation.</p> <p>7 You know, just because I was in the</p> <p>8 area, they put a case on me because I was in the</p> <p>9 area and you -- you know, I guess, because they</p> <p>10 like, kind of knew my background, you know.</p> <p>11 So it was -- you know, I -- I just --</p> <p>12 I just felt so disappointed, like, you know,</p> <p>13 that I was just in there for nothing, basically.</p> <p>14 Q. Okay. And can you describe to me how</p> <p>15 it made you feel frustrated -- or why it made</p> <p>16 you feel frustrated?</p> <p>17 A. Well, I just was frustrated with the</p> <p>18 situation, you know, the whole -- the whole idea</p> <p>19 of, man, I'm just -- I'm going through this and,</p> <p>20 you know, I just felt like I didn't -- I</p> <p>21 shouldn't have been -- I shouldn't have been</p> <p>22 locked up for that case.</p> <p>23 Q. Following your July 2004 arrest, have</p> <p>24 you sought any mental health treatment as a</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 114</p> <p>1 result of those feelings?</p> <p>2 A. No, no, I didn't -- no, no, I -- no,</p> <p>3 I didn't.</p> <p>4 Q. Are you claiming any mental health</p> <p>5 injuries as a result of your July 10, 2004</p> <p>6 arrest and subsequent incarceration?</p> <p>7 MR. FLAXMAN: Objection, form and</p> <p>8 foundation.</p> <p>9 You can go ahead and answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. What is -- could you re- -- could</p> <p>12 you, like, ask me that question again?</p> <p>13 BY MS. WEST:</p> <p>14 Q. Sure. Are you claiming any mental</p> <p>15 injuries as a result of your July 2004 arrest</p> <p>16 and --</p> <p>17 A. Okay.</p> <p>18 Q. -- subsequent incarceration?</p> <p>19 MR. FLAXMAN: Same objection.</p> <p>20 Go ahead.</p> <p>21 BY THE WITNESS:</p> <p>22 A. Yeah. Yeah.</p> <p>23 BY MS. WEST:</p> <p>24 Q. Okay. What are you claiming?</p>	<p style="text-align: right;">Page 116</p> <p>1 matter of fact.</p> <p>2 Q. When was the last time you had</p> <p>3 contact with Ms. Watson?</p> <p>4 A. Maybe about six years ago, something</p> <p>5 like that.</p> <p>6 Q. Are you aware that she prepared an</p> <p>7 affidavit in support of your post-conviction</p> <p>8 proceedings?</p> <p>9 A. Yeah. Yes, I -- yeah, I'm aware of</p> <p>10 it.</p> <p>11 Q. Did you ask her to do that?</p> <p>12 A. No, I didn't.</p> <p>13 Q. Okay. Do you know if somebody did</p> <p>14 ask her to do that?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Who asked her to do that?</p> <p>17 A. I believe, my lawyer.</p> <p>18 Q. Mr. Flaxman?</p> <p>19 A. Yes.</p> <p>20 Q. Mr. Blair, I'm going to show you what</p> <p>21 we'll mark as Individual Defendants' Exhibit 3.</p> <p>22 (WHEREUPON, Individual Defendants'</p> <p>23 Exhibit No. 3 was presented to the</p> <p>24 witness.)</p>
<p style="text-align: right;">Page 115</p> <p>1 A. I'm just -- I'm claiming that I</p> <p>2 just -- I just had -- you know, I just -- the</p> <p>3 effect that it had had on me, the anxiety that</p> <p>4 that -- you know, the situation I was in, I just</p> <p>5 really, really honestly felt that I shouldn't</p> <p>6 have -- I shouldn't have been incarcerated for</p> <p>7 that.</p> <p>8 Q. And do you still feel any anger or</p> <p>9 frustration today that stems from being arrested</p> <p>10 on July 10, 2004?</p> <p>11 A. No, not really, no. I mean, I got</p> <p>12 over it now. It's just so long ago. I mean,</p> <p>13 I've gotten over it now.</p> <p>14 But, at first, yeah, I was a little</p> <p>15 perturbed at -- at the whole situation. But, I</p> <p>16 mean, now, you know, I don't -- I don't have</p> <p>17 any, you know -- no hard feelings about it, no,</p> <p>18 not now.</p> <p>19 Q. Mr. Blair, I forgot to ask you this</p> <p>20 earlier.</p> <p>21 Ms. Watson, do you still have contact</p> <p>22 with her today?</p> <p>23 A. Not -- no, I haven't seen -- I</p> <p>24 haven't seen her in a -- in a few years, as a</p>	<p style="text-align: right;">Page 117</p> <p>1 MS. WEST: For the record, it's PL Joint</p> <p>2 F 2165 through 2168. It's the affidavit of</p> <p>3 Harvey Blair.</p> <p>4 All right. And, Joel, I haven't even</p> <p>5 been asking if you prefer him to take a look at</p> <p>6 this on the screen or on the paper copy.</p> <p>7 MR. FLAXMAN: It's up to you. I have the</p> <p>8 paper right here if you want me to hand it to</p> <p>9 him.</p> <p>10 MS. WEST: Whatever his preference is.</p> <p>11 THE WITNESS: I can see it on the screen.</p> <p>12 BY MS. WEST:</p> <p>13 Q. Okay. That's good.</p> <p>14 All right, Mr. Blair, can you see a</p> <p>15 document on your screen now?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Are you familiar with this</p> <p>18 document?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. I'm just going to scroll down,</p> <p>21 sir, to the last page.</p> <p>22 A. Okay.</p> <p>23 Q. Is that your signature at the bottom</p> <p>24 of this page?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 118

1 A. Yes, ma'am.
2 **Q. Okay. And you see the date next to**
3 **it? It says October 12, 2017?**
4 A. Yes.
5 **Q. Okay. Was that the time period in**
6 **which -- strike that.**
7 **Was July -- I'm sorry -- October 2017**
8 **the time period in which this affidavit was**
9 **drafted?**
10 A. I don't know if that was the day it
11 was drafted, but that was the day I signed it.
12 **Q. Okay. Did you participate in the**
13 **drafting of this affidavit?**
14 MR. FLAXMAN: I'm going to object and
15 instruct him not to answer about his work with
16 his attorney.
17 BY MS. WEST:
18 **Q. Did you review this affidavit prior**
19 **to signing it?**
20 A. Yes.
21 **Q. Okay. And did you review this**
22 **document prior to your deposition today?**
23 A. Yes.
24 **Q. Okay. When you reviewed the**

Page 119

1 affidavit in preparation for your deposition
2 today, did you find everything to be true and
3 accurate?
4 A. Yes.
5 **Q. All right. I'm going to scroll down**
6 **here.**
7 **Do you see Paragraph 27?**
8 A. Yes, ma'am.
9 **Q. Okay. It says: At the time of my**
10 **arrest, it was common knowledge in the community**
11 **that Watts and members of his team were crooked**
12 **officers.**
13 **Do you see that?**
14 A. Yes, I do.
15 **Q. Who were the officers that were part**
16 **of Sergeant Watts' team that were known to be**
17 **crooked?**
18 A. Just him and Mohammed.
19 **Q. Have you ever given a statement to**
20 **the Civilian Office of Police Accountability?**
21 A. No.
22 **Q. Have you ever spoken with anyone at**
23 **the Cook County State's Attorney's Office**
24 **regarding your July 2004 arrest?**

Page 120

1 A. No, I haven't.
2 **Q. Have you ever spoken to anyone with**
3 **the federal government regarding your July 2004**
4 **arrest?**
5 A. No.
6 **Q. Have you ever spoken to any reporters**
7 **or news media outlet regarding your July 2004**
8 **arrest?**
9 A. No.
10 **Q. Do you still keep in contact with any**
11 **of the individuals that you sold drugs with at**
12 **the Ida B. Wells?**
13 A. I don't really keep in contact with
14 them, but if I see them, I -- you know, I speak
15 to them.
16 **Q. The individual that you sold for,**
17 **Baker, when was the last time you had contact**
18 **with him?**
19 A. Oh, I -- as a matter of fact, I seen
20 Baker about -- about a month ago, I think.
21 **Q. And where did you see Baker?**
22 A. I seen Baker in Ellis Park.
23 **Q. Did you speak with Mr. Baker during**
24 **that time about the lawsuit that you filed**

Page 121

1 against the City and other officers?
2 A. No.
3 **Q. Okay. Before this -- this last**
4 **meeting with Mr. Baker, did you have regular**
5 **contact with him?**
6 A. No.
7 **Q. Are you aware that other individuals**
8 **have filed lawsuits against the City of Chicago**
9 **and various police officers related to what**
10 **they're claiming were false arrests that took**
11 **place in the Ida B. Wells?**
12 A. Yes.
13 **Q. Okay. Do you know any of those**
14 **individuals?**
15 A. Yes, I know a few of them, yes.
16 **Q. Who do you know that's filed similar**
17 **lawsuits?**
18 A. Do you want government names or
19 nicknames because I don't know all of the --
20 **Q. Sure.**
21 A. -- government --
22 **Q. Let's start with the government names**
23 **that you know.**
24 A. Government names I know, one of them

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 122	Page 124
<p>1 is Christian -- I forget Christian's last name, 2 but Christian nickname is Greedy. 3 I know another person's name, Lionel. 4 I know a guy named Smoke, but I don't know 5 his -- I don't know his government name. 6 Who else? 7 That's about all I -- all I can 8 remember -- 9 Q. Do you -- 10 A. -- for right now. 11 Q. Do you keep in contact with Christian 12 or Greedy on a regular basis? 13 A. Yeah, I -- yeah. 14 Q. Do you talk on the telephone? 15 A. Well, actually, I cut his hair, so 16 that's -- that's how we keep in contact. 17 Q. How often would you say you see him? 18 A. I see him -- unless he in the 19 neighborhood, I see him, you know, quite -- 20 quite often. 21 Q. And do you keep in regular contact 22 with Lionel? 23 A. I don't talk on the phone or anything 24 to him, but, I mean, you know, he'll stop by.</p>	<p>1 Christian about your lawsuit? 2 A. Basically, you know, we talk -- we 3 just talk about, you know, like how much money 4 we, you know, we might -- think we might get or, 5 you know. We don't go into no deep conversation 6 like, you know, what -- you know, about the 7 lawsuit because I like to keep my business my 8 business. And I -- and they do the same so... 9 But, you know, we -- we -- we -- 10 it -- it -- we have small talk about it is 11 what -- what I'd probably say. 12 Q. And how about Lionel; have you talked 13 to him about your lawsuit? 14 A. I have talked to him about it. 15 Q. Has he talked to you about his 16 lawsuit? 17 A. Not -- not in depth, no. 18 Q. Okay. What did -- what did you talk 19 to Lionel about your lawsuit? What did you guys 20 discuss? 21 A. We just -- he just -- we just 22 discussed about, you know, him directing me, you 23 know, to my lawyer, you know, and what he did 24 with his lawyer or whatever.</p>
Page 123	Page 125
<p>1 He stopped by, and sometimes he comes get his 2 hair cut. But he's not like a regular customer, 3 but he will come by and get his hair cut. 4 Q. And how about Smoke; do you keep in 5 regular contact with Smoke? 6 A. Him -- yeah, him, the same way. But 7 Smoke be out of town a lot. But he -- he does 8 come back and -- when he comes -- when he comes 9 to town, he does come see me. 10 So it's not like we talk on the phone 11 on a daily basis or anything, but he -- yeah, I 12 cut his hair also. So he does come see me. 13 Q. Do you ever speak with Christian 14 or -- Christian about the lawsuit that you 15 filed? 16 A. Yeah, I spoke to him about it before. 17 Q. Did you ever speak with Lionel or 18 Smoke about the lawsuit you filed? 19 A. Yep. 20 Q. Okay. Do Christian, Lionel, or Smoke 21 speak with you about the lawsuits they have 22 filed? 23 A. Yes. 24 Q. What has -- what have you told</p>	<p>1 But it's like -- it's not like -- you 2 know, we have other things -- we talk about 3 other things other than the lawsuit. That 4 doesn't be, like, the topic of our conversation 5 every time we see each other. 6 Q. And how about Smoke; have you spoken 7 with him about your lawsuit? 8 A. Yeah. 9 Q. And what -- 10 A. He did -- him, like about, he's like 11 about the same, you know. It's like he knows -- 12 it's, like, small talk or, you know, it doesn't 13 be like -- you know, we don't go into -- into 14 deep, deep conversation about, you know, our 15 business because, you know, everybody -- we keep 16 our business -- well, me, I personally keep my 17 business my business. And they elect to do the 18 same thing, so... 19 Q. Mr. Blair, do you know a police 20 officer by the name of Calvin Ridgell? 21 A. No, I don't. 22 Q. Okay. Do you know a police officer 23 by the name of Kenneth Young? 24 A. No, I don't.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 126</p> <p>1 Q. Okay. Do you know if either of those 2 police officers had anything to do with your 3 July 10, 2004 arrest? 4 A. No. I don't think so. I don't -- 5 no, I don't -- I don't remember. 6 Q. Mr. Blair, those are all the 7 questions that I have for you. Some of the 8 other attorneys may, but thank you very much for 9 your time. 10 A. Okay. Thank you. Have a wonderful 11 day. 12 MR. PALLES: I have about 20 minutes, Joel. 13 Do you want me to go forward? 14 MR. FLAXMAN: Yeah, go ahead, Eric. 15 EXAMINATION 16 BY MR. PALLES: 17 Q. Hi, Mr. Blair. My -- 18 A. Hi. 19 Q. -- name is Eric Palles. I'm going to 20 try to be as concise as I can and not go over 21 all -- 22 MR. FLAXMAN: Eric, you're a little quieter 23 than Allyson was. I don't know if you can fix 24 that or if I should just turn up our volume.</p>	<p style="text-align: right;">Page 128</p> <p>1 Q. Was he ever involved in any of your 2 prior arrests? 3 A. Not that I remember, no. 4 Q. Did you have a talking conver- -- a 5 relationship with him where you two spoke? 6 A. No. 7 Q. What had you -- well, at the time of 8 your July 10th arrest, how many times would you 9 say you'd been in contact with Officer Mohammed? 10 A. Oh, I would say maybe twice. 11 Q. Okay. And is that why you recognized 12 him when he came on the scene? 13 A. Yeah. 14 Q. Had -- do you recall, on the previous 15 occasions that you saw him, whether or not he 16 was accompanied by any other officers from the 17 tactical team? 18 A. No, if -- when I seen him, he was 19 always with -- with Sergeant Watts. 20 Q. Okay. Now, I believe you said 21 earlier you heard that Officer Mohammed was 22 crooked? 23 A. I felt like I didn't think he was -- 24 I thought he was just crooked because he -- he</p>
<p style="text-align: right;">Page 127</p> <p>1 MR. PALLES: Let me see. I'm wearing 2 plugs. Hold on. 3 What if I take them off? Is that any 4 better? 5 MR. FLAXMAN: It's about the same, but I 6 think -- 7 THE WITNESS: We can -- 8 MR. FLAXMAN: -- we can hear. 9 THE WITNESS: We can go. 10 MR. PALLES: Yeah. Hold on. Now that I 11 took my buds off, I want to make sure I can 12 hear. 13 All right. I'll yell. We good? 14 THE WITNESS: Yeah. 15 BY MR. PALLES: 16 Q. Okay. So, listen, we've been 17 talking -- I represent Kallatt Mohammed. 18 When did you first -- tell me when 19 you first became in touch with Mohammed. What 20 was your first contact with Mohammed? 21 A. I don't remember our first actual 22 contact. I think he probably, like, searched me 23 or something before; but I don't remember, like, 24 our first initial contact. I don't recall.</p>	<p style="text-align: right;">Page 129</p> <p>1 worked with Sergeant Watts. And I know if 2 Sergeant Watts was under scrutiny, I felt like 3 his partner was also. 4 Q. Well, let's talk about Mohammed in 5 particular. 6 What had you heard that he'd done 7 that you felt he was crooked? 8 A. Well, I didn't -- I hadn't heard him 9 do anything derogatory or anything like that, 10 but, you know, I was -- you know, birds of a 11 feather flock together. And I just -- I mean, 12 if my -- if my -- if my -- if my sergeant or my 13 partner -- if he was, you know, kind of shady, 14 and I continued to be his partner, then you 15 would be shady, too. 16 Q. Now, do you recall in your affidavit 17 stating that the judge told you that you'd get a 18 stiffer sentence if you went to trial? 19 A. Yes. 20 Q. Yeah. Who was that judge who told 21 you that? 22 A. I believe it was Judge Laws. 23 Q. Marjorie Laws? 24 A. Yes, sir.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 130	<p>1 Q. And she -- she told you this in open</p> <p>2 court?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. Was that before or after the</p> <p>5 motion to quash hearing, the suppression</p> <p>6 hearing?</p> <p>7 A. That was -- that was after.</p> <p>8 Q. Okay. And what specifically did she</p> <p>9 say to you at that time?</p> <p>10 A. She was like, well, you know, if I</p> <p>11 went -- if I take any trials and I lose, you</p> <p>12 know, she could give me the maximum sentence.</p> <p>13 That's what she said.</p> <p>14 Q. Okay. Did she say that she would</p> <p>15 give you a stiffer sentence if you went to</p> <p>16 trial?</p> <p>17 A. She said if I went to trial and if I</p> <p>18 lost, that I could get the maximum -- she could</p> <p>19 give me the maximum sentence that the case</p> <p>20 carried.</p> <p>21 Q. Okay.</p> <p>22 A. Which would be 15 years.</p> <p>23 Q. Okay. And your public defender was</p> <p>24 present at that time?</p>	Page 132	<p>1 addict, correct?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 A. Yes.</p> <p>5 Q. All right. And at the time you --</p> <p>6 well, let me -- let me back up a minute.</p> <p>7 When you filed suit -- this suit</p> <p>8 against the City in 2019, one of the parties</p> <p>9 produced your criminal history, a rap sheet,</p> <p>10 limited to your Illinois arrests. And there</p> <p>11 were 33 arrests, 12 of which were felonies</p> <p>12 resulting in 9 convictions. Does that sound</p> <p>13 right to you?</p> <p>14 A. Yeah, that sounds about right, I</p> <p>15 think.</p> <p>16 Q. Okay. Now, a lot of those were drug</p> <p>17 arrests, correct?</p> <p>18 A. Yes.</p> <p>19 Q. All right. Now -- and others were,</p> <p>20 what shall I say, misdemeanors, ordinance</p> <p>21 violations, smaller crimes, correct?</p> <p>22 A. Yes.</p> <p>23 Q. All right. And is it true that you</p> <p>24 committed a lot of these crimes to fund your</p>
Page 131	<p>1 A. Yes, I believe so, yeah.</p> <p>2 Q. Okay. That public defender, you</p> <p>3 said, was a male, correct?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. If I would suggest that his</p> <p>6 name was Richard Labrador, would that sug- --</p> <p>7 would that refresh your memory?</p> <p>8 A. It might have. I think -- yeah, I</p> <p>9 think that was him. I think that was his name.</p> <p>10 Q. Okay. You know what, let me back up</p> <p>11 a second.</p> <p>12 A. Okay.</p> <p>13 Q. When you were hearing stuff -- were</p> <p>14 there any people at the Ida B. Wells that you</p> <p>15 recall specifically complaining about Officer</p> <p>16 Mohammed's conduct towards them?</p> <p>17 A. No. Not directly, no.</p> <p>18 Q. Okay. All right. Now, when -- at</p> <p>19 the time that -- July of 2004, you discussed the</p> <p>20 fact that, you know, you had difficulty</p> <p>21 subsequent to your divorce, correct, between --</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And, in fact, at this time in</p> <p>24 July of 2004 and before then, you were a drug</p>	Page 133	<p>1 habit?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Would you say that, in</p> <p>4 addition, at times when you weren't under the</p> <p>5 influence of drugs, you had a difficult time</p> <p>6 complying with authorities?</p> <p>7 A. I've never had a difficult time</p> <p>8 complying with authority.</p> <p>9 Q. Okay. All right. During this</p> <p>10 history that we discussed, were you -- how many</p> <p>11 times other than this particular arrest do you</p> <p>12 claim that you were set up?</p> <p>13 A. I can't -- I can't give you a</p> <p>14 definite answer on that.</p> <p>15 Q. But there were several others; is</p> <p>16 that what you're saying?</p> <p>17 A. I mean, I'm saying that it -- it's --</p> <p>18 it could have been, you know -- it could have</p> <p>19 been, yeah.</p> <p>20 Q. Okay. All right. And we were</p> <p>21 talking about -- now, let's go back. The</p> <p>22 divorce was when, did you say, 2000?</p> <p>23 A. I think 2002, I think.</p> <p>24 Q. Oh, is that right? Okay.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 134	<p>1 A. Yeah.</p> <p>2 Q. Well, do you remember being arrested</p> <p>3 for possession of a controlled substance in</p> <p>4 November of the year 2000 and receiving</p> <p>5 18 months probation?</p> <p>6 A. I don't -- no, I don't remember, but</p> <p>7 it -- it could -- it could have -- yeah, I --</p> <p>8 yeah, I remember that. I remember that.</p> <p>9 Q. And shortly before this incident, you</p> <p>10 had an April of 2003 arrest which resulted -- it</p> <p>11 was for possession --</p> <p>12 A. Mm-hm.</p> <p>13 Q. -- and it resulted in yet another</p> <p>14 15-month probation; am I correct?</p> <p>15 A. I don't remember that. I don't -- I</p> <p>16 don't remember that. I don't -- because I don't</p> <p>17 be -- I don't see them giving me probation on</p> <p>18 top of probation.</p> <p>19 Q. Did -- well, several years later</p> <p>20 but -- all right. But let me ask you this: Did</p> <p>21 you -- on that second occasion, did you qualify</p> <p>22 for drug -- a drug treatment program?</p> <p>23 MR. FLAXMAN: I at least have an objection</p> <p>24 to foundation. I don't know if he remembers the</p>	Page 136	<p>1 A. We didn't -- we didn't -- only time I</p> <p>2 met with him was, like, when I was going to</p> <p>3 court.</p> <p>4 Q. Okay. When you went to court, did</p> <p>5 you have any occasion in which he sat down</p> <p>6 either in your lockup or one of the rooms in</p> <p>7 back of the courthouse and interviewed you about</p> <p>8 the background of the case?</p> <p>9 A. Not that I remember, no.</p> <p>10 Q. Okay. Well, let me ask you this: Do</p> <p>11 you recall telling your attorney on January 13th</p> <p>12 of 2005 that on the day of the arrest, you were</p> <p>13 visiting two people named Angie and Tony?</p> <p>14 A. I don't remember telling him that I</p> <p>15 was visiting Angie and Tony. I --</p> <p>16 Q. Did you know -- I'm sorry. Do you</p> <p>17 know an Angie and Tony?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Okay. And did Angie and Tony live</p> <p>20 in -- stay at Apartment 307 at 540?</p> <p>21 A. No, I -- no. Angie and Tony stayed</p> <p>22 in 511. They didn't stay --</p> <p>23 Q. What apartment number?</p> <p>24 A. I think Angie stayed on the 6th or</p>
Page 135	<p>1 arrest you're asking him about.</p> <p>2 BY MR. PALLES:</p> <p>3 Q. Okay. Shortly after the 2003 arrest,</p> <p>4 did you submit to drug -- drug abuse treatment?</p> <p>5 MR. FLAXMAN: Objection, foundation. I</p> <p>6 don't know if he knows what arrest you're</p> <p>7 talking about.</p> <p>8 MR. PALLES: Okay.</p> <p>9 BY MR. PALLES:</p> <p>10 Q. Can you answer the question, sir?</p> <p>11 A. I -- I don't remember as far as me</p> <p>12 getting any -- I had a drug evaluation. I</p> <p>13 remember getting a drug evaluation, but as far</p> <p>14 as I don't remember what case it was, no.</p> <p>15 Q. Okay. Let me -- let me ask you this:</p> <p>16 When you were arrested for this particular</p> <p>17 offense, did you tell your attorney,</p> <p>18 Mr. Labrador, that you needed help with your</p> <p>19 addiction?</p> <p>20 A. No, I didn't.</p> <p>21 Q. Okay. Let me ask you this -- well --</p> <p>22 okay. You had occasion to meet with him several</p> <p>23 times before your suppression hearing in May</p> <p>24 of 2005; am I correct?</p>	Page 137	<p>1 the 7th floor. I don't -- I don't recall what</p> <p>2 the apartment number was.</p> <p>3 Q. What's Angie's government name, if</p> <p>4 you know?</p> <p>5 A. It's Angela, but I don't re- -- I</p> <p>6 don't know her last name.</p> <p>7 Q. Are you in touch with her today?</p> <p>8 A. No.</p> <p>9 Q. Okay. What about Tony; do you know</p> <p>10 his name?</p> <p>11 A. I know his -- I know his name is --</p> <p>12 yeah, I know his name.</p> <p>13 Q. Yeah, what is it?</p> <p>14 A. Anthony Wright.</p> <p>15 Q. Anthony Wright. Okay.</p> <p>16 Did you know either Angie or Tony to</p> <p>17 be a drug user?</p> <p>18 A. Yes.</p> <p>19 Q. What drugs did they use?</p> <p>20 A. Heroin and cocaine.</p> <p>21 Q. Okay. Did you know Angie or Tony to</p> <p>22 sell drugs?</p> <p>23 A. Well, some time -- yeah, they -- they</p> <p>24 could have they turn pitching sometimes, yeah.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 138</p> <p>1 Q. You say and they could pitch 2 sometimes to earn drugs? 3 A. I said they -- they -- sometimes they 4 would be -- sometimes Angie would be -- she -- 5 she could get a turn, you know, and she'll be 6 pitching. She'll be serving the drugs -- 7 Q. Okay. 8 A. -- sometimes, yeah. 9 Q. Okay. So, now, let me ask you a 10 question. 11 You said you don't remember telling 12 your attorney this back in 2005. But now that 13 I'm mentioning it to you, do you recall visiting 14 Angie and Tony at the time of -- at some time 15 before the arrest on July -- in July of 2004? 16 A. Do I remember visiting before I got 17 arrested -- 18 Q. Yeah. 19 A. -- is that what you're asking me? 20 Q. Yeah. 21 A. Yeah, I -- yeah, I visited her -- 22 both of them before, yeah. 23 Q. Before you saw Stephanie? 24 A. Yeah.</p>	<p style="text-align: right;">Page 140</p> <p>1 BY MR. PALLES: 2 Q. Okay. Let me ask you this: Did you 3 tell your attorney that you were on the 4 3rd floor going down the stairs when 15 people 5 came running up -- 6 A. No. 7 Q. -- the steps? 8 A. I didn't tell my -- I don't think 9 I -- because I wasn't -- I wasn't in the 10 building. I was outside the building. 11 Q. Okay. And did you tell the -- did 12 you tell your attorney that you were taken 13 downstairs with certain of these other people 14 and there were drugs on the floor of the lobby? 15 A. I -- I told -- I don't remember 16 telling them I was taken downstairs. I -- I 17 told them I was taken back in the building and 18 subsequently put on my knees and facing the wall 19 because I was standing right there by the back 20 door. 21 Q. Okay. Now, before you got arrested, 22 there were many, many people present outside the 23 540 Building, correct? 24 A. Correct.</p>
<p style="text-align: right;">Page 139</p> <p>1 Q. How long before you saw Stephanie? 2 A. I don't remember what day I went to 3 visit them prior to -- prior to that day. I 4 can't give you an exact -- 5 Q. Okay. 6 A. -- time or -- but I visit them -- 7 visited -- I visited them before, yeah. 8 Q. Yeah. Okay. I'm sorry. Let me -- 9 let me be clear. I'm only interested right now 10 if you visited them the day that you were 11 arrested. 12 A. Oh. No. 13 Q. Okay. So if you had told your 14 attorney that, that would have been incorrect? 15 MR. FLAXMAN: Objection, form. 16 THE WITNESS: Can I answer? 17 MR. FLAXMAN: Yeah, try to answer. 18 BY THE WITNESS: 19 A. I don't -- I -- I don't remember 20 telling my -- telling my public defender that I 21 was -- I visited -- I was visiting them before I 22 got arrested because if that was the case, I 23 would -- they lived in a different building. 24</p>	<p style="text-align: right;">Page 141</p> <p>1 Q. Dozens of people? 2 A. I would say it could have been 3 between 10, 15 people, I would say, yeah. 4 Q. Okay. Now, do you know a guy named 5 Allen Jay? 6 A. Yes, I know Allen Jay. 7 Q. Okay. Was he there that day? 8 A. I don't remember. 9 Q. Okay. Do you know Allen Jay to be a 10 dealer? 11 A. Yeah. Yeah. 12 Q. A high -- 13 A. Was a dealer -- 14 Q. -- fairly high level? 15 A. Not really a high level, but, I mean, 16 yeah, he -- he was kind of up there, yeah. 17 Q. What building did he sell out of? 18 A. What did he sell? 19 Q. What -- well, what building did he 20 sell out of? 21 A. Oh. I think Allen Jay sold out of 22 545, I think. I'm -- I'm -- I'm not really, 23 really sure, but I think it was 545. 24 Q. Okay. The...</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 142	<p>1 MR. PALLES: Joel, I'm thinking that -- and</p> <p>2 this is for the other counsel as well.</p> <p>3 I sent this email this morning of</p> <p>4 some photographs from the public defender file.</p> <p>5 Joel's got a bunch of paper that I'd rather just</p> <p>6 stick in front of everybody else as, again, it</p> <p>7 was -- it was in the email. Is that okay,</p> <p>8 rather than have me try to -- try to share it?</p> <p>9 MR. FLAXMAN: You want to use the pictures?</p> <p>10 MR. PALLES: I want you to -- I don't want</p> <p>11 to share -- put it on the screen. I'd like you</p> <p>12 to put it in front of him.</p> <p>13 MR. FLAXMAN: Okay. I -- okay. Is it okay</p> <p>14 if I just -- I can just put it on my screen and</p> <p>15 you can see it. Is that okay?</p> <p>16 MR. PALLES: Oh, okay. Fine with me.</p> <p>17 MR. FLAXMAN: I don't have it printed out,</p> <p>18 though.</p> <p>19 MR. PALLES: Okay.</p> <p>20 MR. FLAXMAN: So that's what you -- what</p> <p>21 you said that starts with DO JOINT 020079?</p> <p>22 MR. PALLES: Yeah.</p> <p>23 MR. FLAXMAN: Okay. So Mr. Blair is</p> <p>24 looking at that picture on my computer.</p>	Page 144	<p>1 folks? Yes?</p> <p>2 MR. FLAXMAN: Yes.</p> <p>3 MS. WEST: Yeah.</p> <p>4 MR. PALLES: Okay.</p> <p>5 BY MR. PALLES:</p> <p>6 Q. I'm sorry. All right. So let me</p> <p>7 just -- I want to scroll through these pictures</p> <p>8 for a moment.</p> <p>9 First, let me ask you, Mr. Blair, is</p> <p>10 this the outside of what was the 540 Building at</p> <p>11 Ida B. Wells?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And is it your testimony that</p> <p>14 you were standing outside this building at the</p> <p>15 time that the police came?</p> <p>16 A. Yes, I was standing outside, but I</p> <p>17 was in the -- on the other side. I was in the</p> <p>18 back.</p> <p>19 Q. Oh, you were in the back. Okay.</p> <p>20 A. Yeah, on the backside, yeah.</p> <p>21 Q. All right. All right. Well, let me</p> <p>22 show you these pictures. There's this one.</p> <p>23 A. Okay.</p> <p>24 Q. There's this.</p>
Page 143	<p>1 MR. KOSOKO: Eric, how do you want to --</p> <p>2 how do you want to mark these?</p> <p>3 MR. PALLES: Oh, I'll mark this as Mohammed</p> <p>4 Exhibit Number 1 with today's date.</p> <p>5 MS. WEST: Are you -- are you going to</p> <p>6 screen-share, Joel, or, like, do you want me to</p> <p>7 screen-share?</p> <p>8 MR. PALLES: I -- you know, if I have to,</p> <p>9 I'll screen-share.</p> <p>10 MS. WEST: Okay.</p> <p>11 MR. PALLES: Let me see what I can do here.</p> <p>12 MR. FLAXMAN: Or you can just put on the</p> <p>13 record the Bates label of the page we're looking</p> <p>14 at, right?</p> <p>15 MR. PALLES: Yeah, I'm looking at page --</p> <p>16 well, it's too small for me to see them. I knew</p> <p>17 this was going to be a problem as soon as I...</p> <p>18 It starts with -- it starts with</p> <p>19 DO JOINT 20079. And I'm going to try to share</p> <p>20 it. All I've got to do is find it.</p> <p>21 Here we go. This could be it.</p> <p>22 (WHEREUPON, Mohammed Exhibit No. 1 was</p> <p>23 presented to the witness.)</p> <p>24 MR. PALLES: Did I do it? Did I do it,</p>	Page 145	<p>1 A. Right, that's the lobby.</p> <p>2 Q. Okay. Now -- then there's --</p> <p>3 somebody's pointing here. Do you know who that</p> <p>4 is?</p> <p>5 A. I can't really --</p> <p>6 Q. Okay --</p> <p>7 A. I can't --</p> <p>8 Q. By the way, do you -- okay. Let me</p> <p>9 see. Maybe there's a better picture.</p> <p>10 A. I can't see who that is.</p> <p>11 Q. Okay. Can you see what -- what is</p> <p>12 this a picture of?</p> <p>13 A. That's the -- that's the hallway</p> <p>14 leading to the back door --</p> <p>15 Q. Okay.</p> <p>16 A. -- and also the back stairs.</p> <p>17 Q. Okay. Were you taken to -- to this</p> <p>18 area at all during --</p> <p>19 A. Yes.</p> <p>20 Q. -- your arrest?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And then what's this?</p> <p>23 A. Those, I believe, are the back</p> <p>24 stairs.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 146</p> <p>1 Q. Okay. And also the back -- I'm 2 sorry. I'll do this: 22000 -- 20084 is also 3 the back stairs? 4 A. It looks like it, yeah. 5 Q. Okay. What's this, if you know? 6 A. That's -- that's the same hallway 7 that leads out to the back door, but you 8 can't -- 9 Q. Okay. 10 A. -- see it. It's dark. 11 Q. And this is on the first floor? 12 A. Yes. 13 Q. All right. For the record, this will 14 be 2000 -- 20085. 15 What about this? 20086, what is 16 this? 17 A. Okay. That's where we was at -- 18 that's where we were on our knees in the 19 hallway. 20 Q. Okay. Again, on the first floor? 21 A. Yes. 22 Q. All right. Now, do you know -- and 23 then I think there's another one that I -- I put 24 this on by accident, so I apologize. If we</p>	<p style="text-align: right;">Page 148</p> <p>1 Q. Okay. When you took the picture of 2 the stairs going up, why did you -- had you -- 3 had you gone all the way up the -- I mean, had 4 you been in the stairwell at any time? 5 A. Not that day. 6 Q. Okay. Do you have any idea why those 7 pictures of the stairwell were taken? 8 A. I don't -- I don't know. 9 Q. All right. Let me -- all right. I'm 10 going to go back for a -- 11 A. Okay. 12 Q. -- little while to some of the 13 testimony that you had with Ms. West. 14 Now, you were a member of the 15 Traveling Vice Lords from approximately 1985 to 16 2000, correct? 17 A. Yeah. 18 Q. Okay. Is that why you have a hat and 19 cane tattoo? 20 A. Yes. 21 Q. All right. The Traveling Vice Lords, 22 did they engage in the distribution of illegal 23 narcotics? 24 A. Not -- not in those buildings. No,</p>
<p style="text-align: right;">Page 147</p> <p>1 could somehow eliminate that last page. 2 All right. Let me ask you, sir. Do 3 you know -- have you ever seen these photos 4 before? 5 A. No, not -- I've seen them before, 6 yes, but as far as, you know, to the -- before, 7 prior to the arrest, I hadn't seen them four 8 photos. But, yeah, I've seen -- I've seen those 9 photos before. 10 Q. Do you know who took those photos? 11 A. I don't know who took them. 12 Q. Were you involved in taking those 13 photos? 14 A. Was I involved in who? 15 Q. In taking the photos. 16 A. No. 17 Q. Okay. Now, did your -- these were in 18 your public defender's files. Do you have any 19 understanding as to why those were the photos 20 taken? 21 A. I believe he was -- if my public 22 defender -- if my public defender had those 23 photos, I must have -- I was explaining to him 24 where I was as far as in the building.</p>	<p style="text-align: right;">Page 149</p> <p>1 not in that area. No. 2 Q. Where did they -- but they -- they 3 were -- they were involved in the sale of 4 narcotics, correct? 5 A. Yes. 6 Q. Where? 7 A. On the West Side of Chicago. 8 Q. Okay. Is there a territory that you 9 could mark out by streets in general at that 10 time? 11 A. I don't -- I would say from Harrison 12 and California to, like, Harrison and Western -- 13 Q. Okay. 14 A. -- something like that. 15 Q. Now, in the Ida B. Wells homes, 16 however, the -- correct me if I'm wrong -- I 17 think you said this drug distribution was 18 generally controlled by the Gangster Disciples? 19 A. Yeah. 20 Q. Okay. Would you say that, generally 21 speaking, that area in the Ida B. Wells where 22 you were congregating was an open drug market? 23 A. Yes. 24 Q. Okay. Among the guys who sold there,</p>

41 (Pages 146 to 149)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 150	Page 152
<p>1 do you remember a guy name Tweak?</p> <p>2 A. Yes.</p> <p>3 Q. And Tweak was a guy who sold</p> <p>4 narcotics in the Ida B. Wells?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Do you know whether or not</p> <p>7 Tweak had any relationship with Baker?</p> <p>8 A. I think he -- he knows Baker, but I</p> <p>9 don't know what type of relationship they had.</p> <p>10 Q. Okay. Now, I think maybe Tweak dealt</p> <p>11 with a guy named Art. Do you know a guy named</p> <p>12 Art?</p> <p>13 A. Yes, I do.</p> <p>14 Q. Okay. And you know him as a drug</p> <p>15 dealer?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And you know what? For the</p> <p>18 record, I'm going to have to ask you the --</p> <p>19 their -- about their real names, and you may or</p> <p>20 may not know them.</p> <p>21 Arthur Kirksey (phonetic)? Arthur</p> <p>22 Kirksey? No?</p> <p>23 A. I don't -- if -- I mean, that</p> <p>24 could -- that's Art's real name, but I didn't --</p>	<p>1 A. Was, yes.</p> <p>2 Q. Okay. Now -- but Double R, you</p> <p>3 don't -- you only know his first name was</p> <p>4 Reggie, correct?</p> <p>5 A. Correct.</p> <p>6 Q. All right. Now, Peanut, is he a --</p> <p>7 was he a dealer, too?</p> <p>8 A. No, Peanut was security.</p> <p>9 Q. Security?</p> <p>10 A. Yeah, he worked security.</p> <p>11 Q. For who?</p> <p>12 A. For -- I don't know; anybody.</p> <p>13 Q. For anybody, huh?</p> <p>14 A. Yeah.</p> <p>15 Q. All right. All right. Do, you</p> <p>16 know -- do you know whether or not that's Brian</p> <p>17 Patrick (phonetic)?</p> <p>18 A. I don't know if that's his real name</p> <p>19 because I never knew Peanut's real name, but I</p> <p>20 do know who Peanut is.</p> <p>21 Q. Okay. How about Lionel; is that --</p> <p>22 is he an older guy?</p> <p>23 A. No.</p> <p>24 Q. Young guy?</p>
Page 151	Page 153
<p>1 I didn't -- I didn't -- I wasn't aware of his</p> <p>2 last name, but I did --</p> <p>3 Q. Okay.</p> <p>4 A. -- know his first name was Arthur,</p> <p>5 yeah.</p> <p>6 Q. Okay. How about Tweak; do you know</p> <p>7 him as Jamar Lewis?</p> <p>8 A. No. I know him as Tweak.</p> <p>9 Q. Okay. Good.</p> <p>10 Among the other dealers there, did</p> <p>11 you know a guy named Fuzz?</p> <p>12 A. Yeah, I know Fuzz.</p> <p>13 Q. Okay. He's a dealer, too? Was?</p> <p>14 A. Was. Was a dealer --</p> <p>15 Q. Okay.</p> <p>16 A. -- was.</p> <p>17 Q. And for the record, that's Leonard</p> <p>18 Gibson, if you know?</p> <p>19 A. Yep. Yeah.</p> <p>20 Q. All right. And then, finally, how</p> <p>21 about a guy named Bob, Bob Coleman (phonetic)?</p> <p>22 A. Yeah, I know Big Bob, yes.</p> <p>23 Q. Big Bob, yeah. And he's a dealer</p> <p>24 there as well?</p>	<p>1 A. No, he -- Lionel about my age, a</p> <p>2 little bit younger than me, I think.</p> <p>3 Q. All right. He didn't go by the name</p> <p>4 Pig, did he?</p> <p>5 A. Pig?</p> <p>6 Q. Pig.</p> <p>7 A. No.</p> <p>8 Q. All right.</p> <p>9 A. Lionel, no, not the Lionel I know.</p> <p>10 Q. All right.</p> <p>11 A. It could be, but I don't -- I don't</p> <p>12 recall that.</p> <p>13 Q. Yeah, I forget you're kind of an old</p> <p>14 guy, too. I'm trying to figure out -- well, let</p> <p>15 me ask you, do you know if Lionel White is the</p> <p>16 name of --</p> <p>17 A. Yeah, I know Lionel White.</p> <p>18 Q. Is that the guy we've been talking</p> <p>19 about?</p> <p>20 A. No, not Pig. Lionel White, his</p> <p>21 nickname is Box.</p> <p>22 Q. Okay. I'm sorry. When you were</p> <p>23 talking about Lionel earlier in questions to</p> <p>24 Ms. West, were you referring to Lionel White?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 154</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Fine. And let me ask you</p> <p>3 this: Do you know whether or not Greedy's name</p> <p>4 is Chris Scott?</p> <p>5 A. Is Chris who?</p> <p>6 Q. Scott.</p> <p>7 A. Christian Scott. That's it.</p> <p>8 Q. Okay.</p> <p>9 A. Yep, that's his name. That's it. I</p> <p>10 couldn't remember it at first, but that's it.</p> <p>11 Q. All right. All right. And then --</p> <p>12 so, now, you guys -- Scott, Smoke, Lionel --</p> <p>13 when you get together, you said you guys, you</p> <p>14 know, maybe just do some small talk about the</p> <p>15 case, right?</p> <p>16 A. Yeah.</p> <p>17 Q. And talk about, like, the future, you</p> <p>18 know, what might be at the end of the case?</p> <p>19 A. I mean, you know -- I mean, we</p> <p>20 don't -- yeah, I guess you -- we --</p> <p>21 Q. Okay --</p> <p>22 A. -- I guess you could say --</p> <p>23 Q. What kind of numbers have you been</p> <p>24 throwing around, generally?</p>	<p style="text-align: right;">Page 156</p> <p>1 MR. FLAXMAN: Do you want to keep going or</p> <p>2 take a break?</p> <p>3 Okay. Why don't we take five; is</p> <p>4 that okay?</p> <p>5 MR. KOSOKO: You want to take just five?</p> <p>6 MR. FLAXMAN: Yeah.</p> <p>7 MR. KOSOKO: Okay. Let's do that.</p> <p>8 MR. FLAXMAN: I think we keep going.</p> <p>9 THE VIDEOGRAPHER: The time is 1:37. This</p> <p>10 is the end of Media 3. We're off the record.</p> <p>11 (WHEREUPON, a recess was had.)</p> <p>12 THE VIDEOGRAPHER: The time is now</p> <p>13 1:54 p.m. This is the beginning of Media 4.</p> <p>14 We're back on the record.</p> <p>15 EXAMINATION</p> <p>16 BY MR. KOSOKO:</p> <p>17 Q. Hello, Mr. Blair. My name is --</p> <p>18 A. Hi.</p> <p>19 Q. -- Ahmed Kosoko. I represent Ronald</p> <p>20 Watts. So I think I'm going to bring in the</p> <p>21 anchor on this relay, all right?</p> <p>22 A. Okay.</p> <p>23 Q. Mr. Blair, you said you were a --</p> <p>24 you're a barber; is that correct?</p>
<p style="text-align: right;">Page 155</p> <p>1 A. Don't nobody throw around no numbers</p> <p>2 because don't nobody --</p> <p>3 Q. No?</p> <p>4 A. -- know.</p> <p>5 Q. All right. You've been thinking</p> <p>6 about -- anybody talking about what they're</p> <p>7 going to do with the money?</p> <p>8 A. Not really.</p> <p>9 Q. Okay.</p> <p>10 A. I just know what I'm going to do with</p> <p>11 my money.</p> <p>12 Q. All right. You don't want to invest</p> <p>13 it in any law firms or anything, do you? No?</p> <p>14 MR. PALLES: I'm done. I do appreciate</p> <p>15 your time.</p> <p>16 THE WITNESS: Okay. Thanks. And thanks</p> <p>17 for reminding me of my guys.</p> <p>18 MR. PALLES: Okay.</p> <p>19 THE WITNESS: Because those -- you did name</p> <p>20 quite a few people. I -- I -- I didn't have</p> <p>21 those guys in my mind, but -- but that's okay.</p> <p>22 Yeah.</p> <p>23 MR. KOSOKO: Do you want to take a break</p> <p>24 for lunch, Joel, or...</p>	<p style="text-align: right;">Page 157</p> <p>1 A. Yes.</p> <p>2 Q. Did you actually go to barber's</p> <p>3 college?</p> <p>4 A. No.</p> <p>5 Q. So you just learned -- you learned to</p> <p>6 cut through experience?</p> <p>7 A. Yes.</p> <p>8 Q. And what kind of haircuts are you</p> <p>9 able to cut?</p> <p>10 A. Everything: fades, Afros, tapers.</p> <p>11 You name it, I cut it.</p> <p>12 Q. Do you do -- do you do razor linings?</p> <p>13 A. Yes, I do.</p> <p>14 Q. You're able to do -- and you're able</p> <p>15 to cut Black and white hair?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And of your 20 clients, how</p> <p>18 many of them are of -- are African-American?</p> <p>19 A. All of them.</p> <p>20 Q. Okay.</p> <p>21 (Cell phone ringing.)</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q. And how much do you charge for --</p> <p>24 charge for a head?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 158	Page 160
<p>1 A. I charge \$25 a haircut.</p> <p>2 Q. \$25 a haircut?</p> <p>3 A. Mm-hm.</p> <p>4 Q. And is that for any -- any haircut?</p> <p>5 So even if it's just a lining, you would just</p> <p>6 charge 25?</p> <p>7 A. No, for a line, I charge 15.</p> <p>8 Q. Okay. So 25 for any haircut, 15 for</p> <p>9 a line?</p> <p>10 A. Mm-hm.</p> <p>11 Q. And in your -- you cut at that</p> <p>12 3610 Rhodes address?</p> <p>13 A. Yes.</p> <p>14 Q. Do you actually have a barber's chair</p> <p>15 there?</p> <p>16 A. Yes.</p> <p>17 Q. Is it down in, like, a basement?</p> <p>18 A. Yes.</p> <p>19 Q. How much -- how much traffic do you</p> <p>20 get a day?</p> <p>21 A. It varies. Like, during the</p> <p>22 weekend -- like, Thursday, Friday, Saturday -- I</p> <p>23 can -- I can get kind of busy.</p> <p>24 Monday or -- Monday, Tuesday,</p>	<p>1 very well.</p> <p>2 Q. And when was the last time you cut at</p> <p>3 that place?</p> <p>4 A. Oh, that was a long time ago. I -- I</p> <p>5 only -- I only cut there a few -- a few months.</p> <p>6 I didn't stay there long -- stay there long.</p> <p>7 Q. Where was it located?</p> <p>8 A. On 35th and -- 35th and Giles,</p> <p>9 between Calumet --</p> <p>10 Q. 35th and --</p> <p>11 A. No, 35th and Giles, between</p> <p>12 Giles and -- I want to say, between Giles and</p> <p>13 maybe, I want to say, Calumet. But, yeah, I</p> <p>14 think -- yeah, like, 35th and Giles.</p> <p>15 Q. So this -- when you cut at the</p> <p>16 barbershop before you started cutting at home,</p> <p>17 was this before or after the arrest that is at</p> <p>18 issue for this lawsuit?</p> <p>19 A. I -- I cut before that -- this arrest</p> <p>20 at the barber shop.</p> <p>21 Q. So in 2004, you were cutting at the</p> <p>22 barbershop?</p> <p>23 A. No. In 2004, I was cutting at home.</p> <p>24 Q. Okay.</p>
Page 159	Page 161
<p>1 Wednesday, you know, it be -- you know, it's</p> <p>2 kind of light. Maybe about two to three</p> <p>3 customers might come, you know, during the week.</p> <p>4 But I get more customers on the</p> <p>5 weekends.</p> <p>6 Q. Okay. So are you appointment only?</p> <p>7 A. No, no. You don't have to make an</p> <p>8 appointment, but I like for them to do. But</p> <p>9 sometimes they don't. They just come and ring</p> <p>10 my bell, ring my bell and --</p> <p>11 Q. Okay --</p> <p>12 A. -- if I'm not -- I just do what they</p> <p>13 need to be done.</p> <p>14 Q. Okay. And you've been doing this for</p> <p>15 how long?</p> <p>16 A. I've been doing that since I was, oh,</p> <p>17 about 21.</p> <p>18 Q. You've been kind of doing the barber</p> <p>19 stuff since you were 21?</p> <p>20 A. Mm-hm.</p> <p>21 Q. Okay. What was the name of the shop</p> <p>22 that you cut at before you had the dispute over</p> <p>23 the -- the seat fees?</p> <p>24 A. I can't remember. I don't remember</p>	<p>1 A. I was cutting in my basement.</p> <p>2 Q. All right. So you were arrested in</p> <p>3 July of 2004 in this case; is that correct?</p> <p>4 A. That's correct.</p> <p>5 Q. Okay. Let's go back to January</p> <p>6 of 2004.</p> <p>7 Were you cutting at the barbershop in</p> <p>8 January of 2004?</p> <p>9 A. No.</p> <p>10 Q. Okay. What about February; did you</p> <p>11 cut in February of 2004?</p> <p>12 A. No. I was cutting in my house. I</p> <p>13 was cutting in my house pretty -- all of 2004.</p> <p>14 I had only -- like I -- I think that was maybe,</p> <p>15 like, 2003 or, like -- like, maybe the end of</p> <p>16 2002 going into 2003, I worked at that</p> <p>17 barbershop; but, like I said, I didn't stay</p> <p>18 there long.</p> <p>19 Q. All right. So the barbershop was</p> <p>20 only for a few months --</p> <p>21 A. Right.</p> <p>22 Q. -- sometime in 2002 or 2003?</p> <p>23 A. Mm-hm.</p> <p>24 Q. Okay. So you were having -- who was</p>

44 (Pages 158 to 161)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 162	<p>1 the owner of the shop?</p> <p>2 A. This guy named Wayne. I don't know</p> <p>3 his last name.</p> <p>4 Q. And how much -- how much was he</p> <p>5 charging you to have a chair there?</p> <p>6 A. Well, he was trying to charge me --</p> <p>7 at that time, he was trying to charge me, like,</p> <p>8 250 a week. He was trying to get me.</p> <p>9 Q. Back in '02?</p> <p>10 A. Yeah, he was trying to charge me,</p> <p>11 like, a little bit over 200 a week, yep.</p> <p>12 Q. Okay. And so you all -- you all had</p> <p>13 a dispute over this and you said: I'm out?</p> <p>14 A. I -- right.</p> <p>15 Q. And so after that, you started</p> <p>16 cutting at home?</p> <p>17 A. Well, I was cutting at home already</p> <p>18 before that. I just went and seen -- because</p> <p>19 he -- I knew he needed some help, right. Then,</p> <p>20 he asked me did I want to come, and I was, like:</p> <p>21 Yeah, I'll come try it out.</p> <p>22 But as I got into it, it wasn't for</p> <p>23 me because we couldn't, you know -- we couldn't</p> <p>24 come to some kind of agreement as far as booth</p>	Page 164	<p>1 narcotics, you did it only to take care of your</p> <p>2 basic needs and your addiction; is that correct?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay. How long did you sell illegal</p> <p>5 narcotics during your lifetime?</p> <p>6 A. Maybe about 30 years.</p> <p>7 Q. When was the last time you sold</p> <p>8 illegal narcotics?</p> <p>9 A. It's been a while. Maybe about, I</p> <p>10 want to say, 2010, I'd probably say, about 2010.</p> <p>11 Q. Okay. In 2010 when you sold</p> <p>12 narcotics, did you sell -- I apologize,</p> <p>13 Mr. Blair. I'm --</p> <p>14 A. That's okay.</p> <p>15 Q. I got a respiratory infection that I</p> <p>16 can't shake, okay. So I apologize.</p> <p>17 A. All right.</p> <p>18 Q. When you were selling narcotics in</p> <p>19 2010, where in the city did you sell?</p> <p>20 A. In my neighborhood.</p> <p>21 Q. And you still lived in the low end?</p> <p>22 A. Yes.</p> <p>23 Q. I don't want to get -- don't -- you</p> <p>24 don't need to get too specific about where in</p>
Page 163	<p>1 rent was concerned. So I was like, man, I</p> <p>2 ain't...</p> <p>3 Q. All right. So you had issue with the</p> <p>4 250. When did you first start hustling?</p> <p>5 A. When did I first start hustling?</p> <p>6 Q. Yes, sir.</p> <p>7 A. Maybe in the late '90s.</p> <p>8 Q. So -- and when we say "hustling,"</p> <p>9 I'll translate, when you first started selling</p> <p>10 narcotics.</p> <p>11 A. That's what -- maybe -- it had to be</p> <p>12 in the late '90s; maybe, like, '99 or 2000,</p> <p>13 something like that.</p> <p>14 Q. Now, when you first started -- when</p> <p>15 you first started hustling, you didn't have your</p> <p>16 heroin problem, right?</p> <p>17 A. Yeah, I did.</p> <p>18 Q. You did. Okay. You developed your</p> <p>19 heroin addiction when you were a teenager; is</p> <p>20 that correct?</p> <p>21 A. Yeah, when I was about 18, yeah.</p> <p>22 Q. Okay.</p> <p>23 A. 18 --</p> <p>24 Q. And when you started to sell</p>	Page 165	<p>1 your neighborhood, but...</p> <p>2 Okay. When you -- when you sold in</p> <p>3 your neighborhood, how did people purchase from</p> <p>4 you in 2010?</p> <p>5 A. They would call me, call my phone.</p> <p>6 Q. Okay. And --</p> <p>7 A. Unless they caught me on the street.</p> <p>8 Q. Okay. So when you sold in 2010, you</p> <p>9 wasn't, like, pitching out --</p> <p>10 A. No.</p> <p>11 Q. -- like, in the streets or like --</p> <p>12 you know what I'm saying, or --</p> <p>13 A. Not out of no -- like, not out of no</p> <p>14 building or nothing like that, no.</p> <p>15 Q. Or, like -- like, you know, near a</p> <p>16 storefront or anything like that or...</p> <p>17 A. No. No.</p> <p>18 Q. So -- and did you sell heroin, or did</p> <p>19 you sell cocaine?</p> <p>20 A. I sold heroin.</p> <p>21 Q. Okay. And so people -- it was just</p> <p>22 kind of people would call you and if you had</p> <p>23 some, you'd sell it?</p> <p>24 A. Exactly.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 166	<p>1 Q. Okay. And was that your primary</p> <p>2 source of income in 2010?</p> <p>3 A. No.</p> <p>4 Q. Okay. You -- barber -- being a</p> <p>5 barber is your primary source of income?</p> <p>6 A. Exactly.</p> <p>7 Q. Okay. Of -- of -- during the</p> <p>8 30 years of you selling narcotics, would you say</p> <p>9 that being a barber was still your primary</p> <p>10 source of income?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Which one did you make more</p> <p>13 money doing, being a barber or selling</p> <p>14 narcotics?</p> <p>15 A. Being a barber.</p> <p>16 Q. And how much did you make a week as a</p> <p>17 barber?</p> <p>18 Well, you know what, that's --</p> <p>19 A. I can't --</p> <p>20 Q. I apologize. Let's -- let's go back</p> <p>21 to, you cut ties with Wayne. It's January</p> <p>22 of 2004.</p> <p>23 How much did you make a week being a</p> <p>24 barber?</p>	Page 168	<p>1 A. Yes, sometimes. Yeah.</p> <p>2 Q. And that was, you know, as you</p> <p>3 testified earlier with Ms. West, to either, you</p> <p>4 know, get your wake-up, your midday, or your</p> <p>5 take-home, right?</p> <p>6 A. Mm-hm. Yep.</p> <p>7 Q. Okay. And you -- huh? Is that</p> <p>8 right?</p> <p>9 A. Yeah, that's right.</p> <p>10 Q. And so you didn't -- you didn't do</p> <p>11 this every day, though, right?</p> <p>12 A. I didn't sell drugs every day, no.</p> <p>13 Q. Okay. And when I --</p> <p>14 A. But I cut hair every day.</p> <p>15 Q. You cut hair every day, though,</p> <p>16 right?</p> <p>17 A. Every day.</p> <p>18 Q. At least somebody would come by to</p> <p>19 get a fade, a line in, something?</p> <p>20 A. Something, exactly.</p> <p>21 Q. Okay. So what days -- what -- on</p> <p>22 what days would you decide to hustle?</p> <p>23 A. It wasn't, like, any particular day.</p> <p>24 It was, like, I guess, when -- as -- whenever,</p>
Page 167	<p>1 A. I don't remember. It varies, you</p> <p>2 know. Some weeks, I might make 200 or some</p> <p>3 might -- some weeks, I might make 150, you know.</p> <p>4 It varies. If it's a holiday weekend, I could</p> <p>5 make up to 300 or so.</p> <p>6 Q. And I'm talking about in '04, right?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. And back in '04, how much did</p> <p>9 you charge a head?</p> <p>10 A. I only charged -- I only charged 15.</p> <p>11 I charged \$15 a head then.</p> <p>12 Q. Okay. And back then, you were still</p> <p>13 cutting it at that same 3610 Rhodes address; is</p> <p>14 that right?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Now, do people just know you as HBO</p> <p>17 the barber or does the shop inside the 3610</p> <p>18 address have a name?</p> <p>19 A. No, they know me as HBO the barber.</p> <p>20 Q. Okay. All right. So -- but even</p> <p>21 though, you know, you could make up to \$200 a</p> <p>22 week cutting hair, sometimes you would -- you</p> <p>23 would -- you would sell narcotics or be involved</p> <p>24 in narcotics trade; is that correct?</p>	Page 169	<p>1 like, time presented itself. You know, I</p> <p>2 just -- I didn't have a specific day where I</p> <p>3 would, you know, sell narcotics. You know, it</p> <p>4 was -- it was, like, well, it was -- in the</p> <p>5 moment, I probably would or I probably wouldn't.</p> <p>6 But that wasn't --</p> <p>7 Q. Okay. So --</p> <p>8 A. -- my main objective of the day.</p> <p>9 Q. I'm sorry to interrupt you.</p> <p>10 So you weren't officially part of Big</p> <p>11 Shorty's organization, right?</p> <p>12 A. No. Uh-uh.</p> <p>13 Q. You weren't officially a part of</p> <p>14 Brian Ford's organization, correct?</p> <p>15 MR. FLAXMAN: Objection, foundation.</p> <p>16 BY MR. KOSOKO:</p> <p>17 Q. Okay. When I say "Brian Ford," did</p> <p>18 you know B-Lo's real name to be Brian?</p> <p>19 A. Yes, but I didn't know that was his</p> <p>20 last name.</p> <p>21 Q. You didn't know -- but you knew</p> <p>22 B-Lo -- so when I say "B-Lo," you know that</p> <p>23 individual to be an African-American male named</p> <p>24 Brian?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 170	<p>1 A. Brian, yeah.</p> <p>2 Q. But you don't know his last name to</p> <p>3 be Ford?</p> <p>4 A. I didn't know that, no.</p> <p>5 Q. Okay. So when you -- you weren't</p> <p>6 officially a part of B-Lo's organization,</p> <p>7 correct?</p> <p>8 A. Not officially, no.</p> <p>9 Q. And you weren't officially a part of</p> <p>10 Baker's organization, correct?</p> <p>11 A. No.</p> <p>12 Q. Okay. Did you ever --</p> <p>13 A. Because I worked whoever I wanted to</p> <p>14 work for. I just -- well, you know what I mean.</p> <p>15 I didn't -- it wasn't like I was, you know, just</p> <p>16 confined to one person --</p> <p>17 Q. Right.</p> <p>18 A. -- you know.</p> <p>19 Q. And those guys were GDs, right?</p> <p>20 A. Yeah, they GDs, yep.</p> <p>21 Q. Okay. And you were a VL, right?</p> <p>22 A. Yep.</p> <p>23 Q. Okay. So you were kind of -- you</p> <p>24 were a free agent; you just -- you would just go</p>	Page 172	<p>1 for B-Lo down at the extensions, though, right?</p> <p>2 A. Yes.</p> <p>3 Q. And you worked for Baker down at the</p> <p>4 extension; is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. Do you ever remember working for</p> <p>7 Allen Jay down at the extension?</p> <p>8 A. No.</p> <p>9 Q. No. Okay. So the things that you</p> <p>10 would do within the drug trade when you did work</p> <p>11 it is, sometimes you would be security, right?</p> <p>12 A. Yes.</p> <p>13 Q. Sometimes you would pitch; is that</p> <p>14 correct?</p> <p>15 A. That's correct.</p> <p>16 Q. Which means you would actually be the</p> <p>17 person that would hand the drugs over to the</p> <p>18 Patreon -- the patron; is that correct?</p> <p>19 A. Right.</p> <p>20 Q. Okay. What were some of the other</p> <p>21 things you did?</p> <p>22 A. Well, if I didn't do -- if -- it was</p> <p>23 either pitching or I worked security.</p> <p>24 Q. Okay. So when you worked security,</p>
Page 171	<p>1 make money however you could make money, right?</p> <p>2 A. Pretty much, yeah.</p> <p>3 Q. Okay. So if you weren't busy cutting</p> <p>4 hair, you would just wander down to the Wells</p> <p>5 and just see if you could make a little bit of</p> <p>6 extra --</p> <p>7 A. See, I just -- right. Yeah, I would</p> <p>8 do that.</p> <p>9 Q. Okay. So how -- so you -- okay. So</p> <p>10 let's talk about Big Shorty for just a second.</p> <p>11 A. Okay.</p> <p>12 Q. When was the first time you ever</p> <p>13 worked within the drug operation that Big Shorty</p> <p>14 had going?</p> <p>15 A. I don't -- I don't remember. I</p> <p>16 can't -- I can't -- I couldn't give you a</p> <p>17 specific year. I just -- because I don't</p> <p>18 remember. But I -- I've had -- I've worked for</p> <p>19 him before, yes.</p> <p>20 Q. Okay. Do you remember ever working</p> <p>21 for Big Shorty down at the extension?</p> <p>22 A. Not -- no, not in the -- in the</p> <p>23 extension, no.</p> <p>24 Q. Okay. Do you -- you remember working</p>	Page 173	<p>1 how did you detect the police officers?</p> <p>2 A. You detect them -- if they -- you</p> <p>3 know, I mean, you know an unmarked car, what</p> <p>4 they rode in. And if they -- you know, if they</p> <p>5 drove up in something else, I mean, then you</p> <p>6 have to just -- you know, you would holler in</p> <p>7 their face.</p> <p>8 Q. You would alert -- you would alert</p> <p>9 the people that were pitching that day --</p> <p>10 A. Exactly.</p> <p>11 Q. -- "police, police," or something to</p> <p>12 that effect, right?</p> <p>13 A. Well, you would holler "clean up."</p> <p>14 Q. "Clean up," right?</p> <p>15 A. Mm-hm.</p> <p>16 Q. Did you -- sometimes it would be</p> <p>17 "five-oh, five-oh"?</p> <p>18 A. No, it would be "15" or "12"s.</p> <p>19 Q. You used "12" back in '04?</p> <p>20 A. Yeah. Yeah.</p> <p>21 Q. Okay. So sometimes you would holler</p> <p>22 out "clean up," sometimes you would holler out</p> <p>23 "12," sometimes you would holler out "15"?</p> <p>24 A. Mm-hm.</p>

47 (Pages 170 to 173)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 174</p> <p>1 Q. And that signified to the people 2 pitching that day to -- to stop selling drugs -- 3 A. Stop what they're doing -- 4 Q. -- correct? 5 A. -- and -- yeah. 6 Q. All right. So how long did you 7 freelance or be a free agent in the drug trade 8 before you had your first contact with police? 9 A. When I had first contact with who? 10 Q. Got arrested. 11 A. Oh. I don't know. It was, like, 12 from the time I first got arrested, it was like 13 I just -- it seemed like I kept getting 14 arrested. And it was, like, around, like, 2000, 15 I think, somewhere -- 16 Q. So the first time CPD caught you as 17 part of a drug operation was in the early 2000s; 18 is that correct? 19 A. Yeah, but I wasn't -- 20 MR. FLAXMAN: Objection -- objection, 21 foundation. 22 BY THE WITNESS: 23 A. I wasn't part of no operation, you 24 know --</p>	<p style="text-align: right;">Page 176</p> <p>1 Q. Okay. So in the early 2000s, you 2 were arrested for selling drugs, right? 3 A. No, I was arrested for having drugs. 4 Q. Okay. Now, when you were arrested 5 for having drugs, when you were caught in the 6 early 2000s, was it because your own 7 personal-use drugs that they caught you with? 8 A. Yes. Yes. 9 Q. Can you tell me about the 10 circumstances of that arrest? 11 A. It was -- maybe that arrest, I think 12 I -- I think I was coming out of the building, 13 and I had just purchased something. And they 14 seen me coming out the building and they 15 searched me and they caught it. They found that 16 I had something on me. 17 Q. Okay. And what was the resolution of 18 that arrest? 19 A. I think I probably went to IDOC and 20 did maybe 61 days. 21 Q. Okay. And did you plead guilty to 22 that offense? 23 A. Yeah. 24 Q. Okay. Were you appointed a public</p>
<p style="text-align: right;">Page 175</p> <p>1 BY MR. KOSOKO: 2 Q. Okay -- 3 A. -- per se. 4 Q. -- the first time you were arrested 5 for a narcotics charge, were you involved in the 6 trade -- the distribution of narcotics? 7 A. I was a part of selling -- I would 8 sell, but I wasn't on nobody's team or nothing 9 like that. 10 Q. Okay. So the first time you were 11 caught selling drugs, you were just -- you were 12 selling your own drugs; you weren't pitching for 13 somebody else; you weren't -- 14 A. Oh, yeah, I was pitching for 15 somebody. Yeah, I was pitching for somebody -- 16 Q. Okay. So -- 17 A. -- yeah. 18 Q. -- I'll try to make my questions as 19 clear as possible. I'm doing it -- 20 A. Okay. 21 Q. -- one, you know, for the legal -- 22 legal way, but I'll try to talk to you in a 23 common way as much as possible, okay? 24 A. Okay.</p>	<p style="text-align: right;">Page 177</p> <p>1 defender to represent you for that offense? 2 A. Yes. 3 Q. The next time that you were arrested 4 for a drug charge, how long after that did that 5 occur? 6 A. I don't know; maybe -- maybe a year 7 or two later. 8 Q. Okay. And do you remember what 9 happened with that arrest? 10 A. I can't remember what happened at 11 every arrest. But, I mean, some cases, I beat; 12 some cases, I didn't beat. 13 Q. Okay. Now, the cases that you -- 14 that you beat, how did you beat them? 15 A. I beat them in, like, the 16 preliminary -- preliminary hearing, you know. 17 Q. Okay. And in these cases that you 18 beat during the prelim, were you represented by 19 the public defender's office? 20 A. Yes. 21 Q. Now, when was the first time that you 22 encountered the person you know to be Ronald 23 Watts? 24 A. The first time I encountered Ronald</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 178	<p>1 Watts -- well, I always knew who Watts was, you</p> <p>2 know. But me personally, I -- like, maybe the</p> <p>3 first time I encountered -- I was -- me -- I</p> <p>4 had -- me and this young lady was living in the</p> <p>5 Ida B. Wells extension. And I think that would</p> <p>6 have been maybe -- maybe 2001 or '2 or something</p> <p>7 like that. And --</p> <p>8 Q. Okay. So in 2001 or 2002, you</p> <p>9 encountered Ronald Watts, okay --</p> <p>10 A. Yes.</p> <p>11 Q. -- is that correct?</p> <p>12 A. Mm-hm.</p> <p>13 Q. Okay. What were the circumstances of</p> <p>14 that encounter?</p> <p>15 A. Like I said, I was staying with this</p> <p>16 young lady in the Ida B. Wells extensions. She</p> <p>17 had got an apartment -- she had got an apartment</p> <p>18 because she, you know, had cleaned it up real</p> <p>19 nice. And Watts knew that -- you know, that,</p> <p>20 you know, they sold drugs in the building.</p> <p>21 But, anyway, he came and knocked on</p> <p>22 the door one day. He knocked on our door one</p> <p>23 day. And he was, like, bust the door down. We</p> <p>24 busted -- I busted the door down. And they</p>	Page 180	<p>1 A. Yes.</p> <p>2 Q. What did you talk about?</p> <p>3 A. Actually, I was laying down. I was</p> <p>4 laying down in the -- in my room. And he was,</p> <p>5 like: Why your ass ain't down there working?</p> <p>6 Why you ain't downstairs working?</p> <p>7 And I was like: Man, I didn't get up</p> <p>8 in time.</p> <p>9 And then he was like -- he was</p> <p>10 like -- he went -- he went in the living room</p> <p>11 and talked to my buddy, who was living with me</p> <p>12 at the time, which was Short Body.</p> <p>13 And on his -- so him and Mohammed,</p> <p>14 they both used the bathroom, and they both went</p> <p>15 in the living room while I was laying -- still</p> <p>16 in the room laying down.</p> <p>17 And on his way out, he was like:</p> <p>18 Man, your buddy -- your buddy, Short Body, he</p> <p>19 got you, man.</p> <p>20 I was like: All right.</p> <p>21 And they left out the door.</p> <p>22 I went in the living room, and</p> <p>23 Short Body had a lot of mother-fucking dope, and</p> <p>24 he gave me about ten bags, something like that.</p>
Page 179	<p>1 wanted to use the bathroom.</p> <p>2 And at that time, I had Short Body,</p> <p>3 him and his girl was also staying in the same</p> <p>4 place --</p> <p>5 Q. Okay. So -- but what -- was this in</p> <p>6 the extensions at the Ida B. Wells?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And what building was this?</p> <p>9 A. That was in 575.</p> <p>10 Q. Okay. And what apartment number?</p> <p>11 A. It was on the 1st -- I mean, it was</p> <p>12 on the 1st -- I mean, it was on the 2nd floor,</p> <p>13 so I think it was maybe 203 or something like</p> <p>14 that.</p> <p>15 Q. And was Ronald Watts -- how was he</p> <p>16 dressed that day?</p> <p>17 A. In plain clothes.</p> <p>18 Q. Was he with a partner or by himself?</p> <p>19 A. He was with Mohammed.</p> <p>20 Q. Okay. And that was in 2001 or 2002?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And did you speak with</p> <p>23 Sergeant Watts in this first encounter in 2001</p> <p>24 or 2002 with Mohammed?</p>	Page 181	<p>1 So --</p> <p>2 Q. Short Body gave you ten bags --</p> <p>3 A. -- I say that and say this, Watts</p> <p>4 came up there and hit him, you know. He hit</p> <p>5 Short Body, and Short Body hit me.</p> <p>6 So -- and that was, like, our first,</p> <p>7 you know, face-to-face engagement.</p> <p>8 Q. Okay. I'm going to need you to</p> <p>9 translate just for the record, okay, Mr. Blair?</p> <p>10 So --</p> <p>11 A. Okay.</p> <p>12 Q. -- Watts comes in and he hit the</p> <p>13 apartment; is that correct?</p> <p>14 A. He didn't hit it. He just -- he</p> <p>15 knocked on the door. And he was, like, bust the</p> <p>16 door down.</p> <p>17 Q. Okay. So he knocked on the door. He</p> <p>18 walked -- he didn't actually destroy the door,</p> <p>19 right? He just --</p> <p>20 A. No.</p> <p>21 Q. -- somebody opened the door and let</p> <p>22 him in, right?</p> <p>23 A. Right.</p> <p>24 Q. Okay. He -- supposedly, he used the</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 182

1 **bathroom; is that correct?**
2 A. Yeah.
3 **Q. He had a conversation with --**
4 MR. FLAXMAN: Objection --
5 BY MS. WEST:
6 **Q. -- Short Body --**
7 MR. FLAXMAN: Hold on. Hold on. I'm
8 sorry. I'm objecting to form.
9 And I'm sorry that I talked over your
10 next question.
11 MR. KOSOKO: It's all right, Joel.
12 BY MR. KOSOKO:
13 **Q. Mr. Watts allegedly used the**
14 **bathroom; is that right?**
15 A. Yes.
16 **Q. Okay. And then after he returned out**
17 **of the bathroom, what was he and Short Body**
18 **talking about?**
19 A. I don't know. I was in my room.
20 They was in the living room. So I don't know.
21 **Q. Now, when you say he hit Short Body**
22 **and then Short Body hit you, what do you mean by**
23 **that?**
24 A. He gave Short Body a bundle of dope.

Page 183

1 **Q. Okay. And you saw Sergeant Watts in**
2 **2001/2002 in the presence of Mohammed give**
3 **Short Body a bundle of dope?**
4 A. Well, I was not -- well, like I said,
5 they were in -- they were in our apartment,
6 they -- you know, and Short Body didn't have
7 nothing. I didn't have anything. So -- and
8 when they -- when he -- when Watts left, when he
9 left out the door, he was like: Man, your man
10 got you.
11 And I was like: All right.
12 And I went in there, and Short Body,
13 he gave me a few bags.
14 **Q. Okay. And so Watts and Mohammed**
15 **didn't arrest you on this day; is that correct?**
16 A. No.
17 **Q. Okay. It's your belief that they**
18 **gave Short Body some drugs?**
19 A. I know they did.
20 **Q. Okay. And then from those drugs,**
21 **Short Body gave you those drugs; is that**
22 **correct?**
23 A. Yeah, he gave me some, yeah.
24 **Q. Okay. All right. And when was the**

Page 184

1 **next time you saw Sergeant Watts after this**
2 **2001/2002 incident --**
3 A. Um --
4 **Q. Oh, by the way -- I'm sorry. I'll**
5 **withdraw that question for now.**
6 **What month in 2001 or 2002 did this**
7 **incident happen?**
8 A. Oh, it was in the summer, so I want
9 to say maybe, like, July.
10 **Q. Okay.**
11 A. Something like that.
12 **Q. So July of '01 or '02; is that**
13 **correct?**
14 A. July -- yeah, that's correct.
15 **Q. In the 575 Building; is that right?**
16 A. That's right.
17 **Q. Okay. And when was the next time you**
18 **encountered Sergeant Watts?**
19 A. The next time I encountered Sergeant
20 Watts was we were -- we were outside. We was
21 outside one day. We was outside, a whole bunch
22 of us was outside --
23 **Q. And what year was this?**
24 A. I don't know; it could have been

Page 185

1 maybe '03, something like that.
2 **Q. How many months after this July of**
3 **'01 or '02 incident was it?**
4 A. How many -- how many months it was
5 after --
6 **Q. Yes, sir.**
7 A. I don't know; it was maybe, like --
8 maybe six or seven months, maybe seven months
9 after the first encounter with the -- when he
10 came to the apartment about -- maybe about seven
11 months after that.
12 **Q. Now, were you still -- going back to**
13 **this 2001 or 2002 incident, were you still**
14 **married to your wife at that time?**
15 A. No, we were going through divorce
16 then --
17 **Q. And what was your wife's name, by the**
18 **way?**
19 A. Pamela.
20 **Q. She had the same last name, Pamela**
21 **Bair -- Blair?**
22 A. Blair, yeah.
23 **Q. Okay. Now, prior to this first**
24 **encounter with Sergeant Watts, had you been in**

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 186	<p>1 prison before?</p> <p>2 A. Um, yeah.</p> <p>3 Q. Okay. And how many times had you</p> <p>4 been in prison before this first encounter with</p> <p>5 Sergeant Watts in either 2001 or 2002?</p> <p>6 A. I think it was maybe -- it could have</p> <p>7 been once. It could have been once, or it could</p> <p>8 have been twice. But they was --</p> <p>9 Q. (Indiscernible.)</p> <p>10 A. -- because they was, like, real short</p> <p>11 bits. They was only, like, 61 days. So --</p> <p>12 Q. Okay. So -- so when was the last --</p> <p>13 what was the last prison you were in before you</p> <p>14 encountered Sergeant Watts?</p> <p>15 A. I don't remember.</p> <p>16 Q. When were you discharged from IDOC</p> <p>17 custody prior to your first encounter with</p> <p>18 Sergeant Watts?</p> <p>19 A. Man, I -- two years, I don't</p> <p>20 remember, bro. I don't remember. I can't give</p> <p>21 you a definitive answer on that.</p> <p>22 Q. Okay. So let's go to this second</p> <p>23 encounter with Sergeant Watts.</p> <p>24 You said you were outside with a</p>	Page 188	<p>1 I said: Man, I ain't getting</p> <p>2 nothing. What you...</p> <p>3 And, subsequently, he couldn't find</p> <p>4 nothing because I ain't had nothing. But he</p> <p>5 said he'd been watching me all morning with</p> <p>6 binoculars.</p> <p>7 Q. Okay. And he didn't arrest you that</p> <p>8 day; is that correct?</p> <p>9 A. No. He --</p> <p>10 Q. Okay --</p> <p>11 A. -- was looking, though --</p> <p>12 (Unreportable cross-talk.)</p> <p>13 BY MR. KOSOKO:</p> <p>14 Q. -- conversation -- I'm sorry. Go</p> <p>15 ahead.</p> <p>16 A. I said he was looking. He was -- he</p> <p>17 was trying to find, you know what I'm saying,</p> <p>18 drugs, because he -- you know, he said I was --</p> <p>19 he said he was watching me -- he had been</p> <p>20 watching me all morning. And -- and I was out</p> <p>21 there working. I was out there -- I was out</p> <p>22 there pitching. But when he came, it was over</p> <p>23 with.</p> <p>24 Q. Okay. So you were pitching that day;</p>
Page 187	<p>1 bunch of people; is that right?</p> <p>2 A. Yeah.</p> <p>3 Q. And this could have occurred sometime</p> <p>4 in 2003?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Can you remember approximately</p> <p>7 when in 2003?</p> <p>8 A. Oh, I can't -- I don't know. Maybe</p> <p>9 around May, something like that, I believe. It</p> <p>10 had to have been around May or something like</p> <p>11 that, yeah. I know we had on light jackets, but</p> <p>12 it wasn't -- you know, it was, like, spring. It</p> <p>13 was spring, like, going into the summer months.</p> <p>14 Q. Okay. And can you describe for me</p> <p>15 this second encounter with Sergeant Watts?</p> <p>16 A. The second encounter was, like, we</p> <p>17 was -- we wasn't in -- we weren't by the</p> <p>18 extension. We were in -- by the row houses.</p> <p>19 And Sergeant Watts was like: Man, you know,</p> <p>20 I've been watching you all morning.</p> <p>21 And I'm like: Watching me doing</p> <p>22 what?</p> <p>23 He's like: Man, I've been watching</p> <p>24 you pitch all morning. Where is it at?</p>	Page 189	<p>1 is that right?</p> <p>2 A. Yeah.</p> <p>3 Q. Sergeant Watts confronted you about</p> <p>4 pitching that day, right?</p> <p>5 A. Yep.</p> <p>6 Q. But he never arrested you for selling</p> <p>7 narcotics that day?</p> <p>8 A. No, he didn't arrest me that day.</p> <p>9 Q. Okay.</p> <p>10 A. He couldn't find no narcotics to</p> <p>11 arrest me.</p> <p>12 Q. Okay. Did you go to prison after</p> <p>13 that encounter with Sergeant Watts?</p> <p>14 A. Yeah, I -- yeah, I would -- yeah.</p> <p>15 I've been to prison quite --</p> <p>16 Q. Okay. What did you go to prison --</p> <p>17 A. -- a few times --</p> <p>18 Q. I'm sorry. I'm sorry to interrupt</p> <p>19 you. Go ahead.</p> <p>20 A. I said I -- I've been in prison quite</p> <p>21 a few times. So, yeah, it was -- it's a</p> <p>22 possibility that after that encounter, I went</p> <p>23 back to the joint, yeah.</p> <p>24 Q. Okay. When you -- you've been in the</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 190	<p>1 joint a bunch of times, right?</p> <p>2 A. Yes.</p> <p>3 Q. And when I say "the joint," you've</p> <p>4 been in IDOC custody a number of times; is that</p> <p>5 correct?</p> <p>6 A. That's correct.</p> <p>7 Q. And each time you were in -- had been</p> <p>8 in the custody of the Illinois Department of</p> <p>9 Corrections, it has been for narcotics, correct?</p> <p>10 A. Yes, sir, I -- yeah.</p> <p>11 Q. Now -- so let's piece together the --</p> <p>12 so how long after this first encounter where</p> <p>13 Sergeant Watts just confronted you about selling</p> <p>14 drugs did you next encounter him?</p> <p>15 A. I don't know how long after</p> <p>16 that that -- I don't know how -- I don't</p> <p>17 remember how long it was, you know, from, like,</p> <p>18 going to the joint then I see Sergeant Watts. I</p> <p>19 can't remember each encounter that we had.</p> <p>20 Q. Okay. Well, let's -- let's put it --</p> <p>21 let's try to put it chronologically.</p> <p>22 So you were arrested in July of '04,</p> <p>23 correct?</p> <p>24 A. Yes.</p>	Page 192	<p>1 A. No, I don't remember.</p> <p>2 Q. Okay. So the first time that</p> <p>3 Sergeant Watts or any member of his tactical</p> <p>4 team ever arrested you was in July of 2004; is</p> <p>5 that correct?</p> <p>6 A. No, that was not the first time.</p> <p>7 That's why I said -- that's what I'm telling</p> <p>8 you. That wasn't the first time.</p> <p>9 Q. All right. When was the first time</p> <p>10 that you were arrested by members of Sergeant</p> <p>11 Watts' tactical team?</p> <p>12 A. I don't remember, man. I can't -- I</p> <p>13 don't remember. I don't remember. That was</p> <p>14 20 years ago. I don't remember.</p> <p>15 Q. Okay. Well, July of -- did -- were</p> <p>16 you ever arrested for any outstanding warrants</p> <p>17 prior to your July of 2004 arrest?</p> <p>18 A. I don't -- I don't -- not that I</p> <p>19 recall, no.</p> <p>20 Q. Okay. Do you recall a white officer</p> <p>21 by the name of Brian Bolton arresting you for an</p> <p>22 outstanding warrant you had on January 7, 2004?</p> <p>23 A. Maybe.</p> <p>24 Q. Okay. Do you recall --</p>
Page 191	<p>1 Q. Okay. You just recounted some</p> <p>2 encounter with Sergeant Watts in May of 2003,</p> <p>3 correct?</p> <p>4 A. That's correct.</p> <p>5 Q. Okay. Do you remember any encounters</p> <p>6 with Sergeant Watts between May of 2003 and July</p> <p>7 of 2004?</p> <p>8 A. I don't -- not directly, but it could</p> <p>9 have been, like -- like, officers that -- you</p> <p>10 know, that work under him --</p> <p>11 Q. Well, hang on. Hang on because</p> <p>12 I'm --</p> <p>13 A. But him per se, I can't remember --</p> <p>14 Q. I'm asking you specifically right now</p> <p>15 only about my client. When did you encounter my</p> <p>16 client? Don't assume I'm asking about anybody</p> <p>17 on his team --</p> <p>18 A. Okay.</p> <p>19 Q. -- I'm asking specifically about my</p> <p>20 client and my client only, okay?</p> <p>21 A. Okay.</p> <p>22 Q. All right. So between May of 2003</p> <p>23 and July of 2004, do you recall any encounters</p> <p>24 with Ronald Watts?</p>	Page 193	<p>1 A. Yeah, maybe --</p> <p>2 Q. -- Sergeant Watts being present for</p> <p>3 that arrest?</p> <p>4 A. No.</p> <p>5 Q. Okay. Do you recall Sergeant Watts</p> <p>6 being at the station after you were arrested for</p> <p>7 that warrant in January of 2004?</p> <p>8 A. No, I don't remember. I don't</p> <p>9 remember him being at the station, no.</p> <p>10 Q. Okay. So now we have this 2000</p> <p>11 and -- July 10th of 2004; is that correct?</p> <p>12 A. Yeah.</p> <p>13 Q. And on January 9th of 2004, did you</p> <p>14 sell drugs?</p> <p>15 A. Maybe. It's -- it's -- it's</p> <p>16 possible.</p> <p>17 Q. Okay. Prior to your arrest on</p> <p>18 July 10th of 2004, when was the last time you</p> <p>19 sold drugs?</p> <p>20 A. I have -- I don't remember a specific</p> <p>21 date, man. I can't -- I don't remember. I</p> <p>22 can't -- I don't know.</p> <p>23 Q. Prior to your July 10th of 2004</p> <p>24 arrest, when was the last time you used heroin?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 194	<p>1 A. Maybe the day before.</p> <p>2 Q. On the 9th, you used heroin?</p> <p>3 A. Yeah. Yes. Yeah --</p> <p>4 Q. Okay.</p> <p>5 A. -- maybe the day before, yeah.</p> <p>6 Q. Okay. Do you recall cutting hair on</p> <p>7 the 9th?</p> <p>8 A. I mean, it's -- it -- I might have.</p> <p>9 I might have cut hair on the 9th.</p> <p>10 Q. All right. What do you remember</p> <p>11 about July 9th of 2004?</p> <p>12 A. What do I remember about July 9th?</p> <p>13 Q. Mm-hm. Tell me about your day.</p> <p>14 A. I don't -- I don't know. It was,</p> <p>15 like, you know, a regular day --</p> <p>16 Q. All right.</p> <p>17 A. -- you know, me doing what I do. I</p> <p>18 can't --</p> <p>19 Q. Okay.</p> <p>20 A. -- I mean, as far as specifically</p> <p>21 tell you what I did on -- on July the 9th of</p> <p>22 2004, I can't -- I don't know. I don't -- I</p> <p>23 mean, I think we -- I don't remember what I did.</p> <p>24 Q. Okay. So -- but from -- and I don't</p>	Page 196	<p>1 handing drugs to someone who wants to purchase</p> <p>2 drugs, correct?</p> <p>3 A. Yeah, that's correct.</p> <p>4 Q. Of all those different things that</p> <p>5 you could do, you can't remember what you did on</p> <p>6 July 9th of '04; is that correct?</p> <p>7 A. I mean, I -- it's -- no, I don't</p> <p>8 remember specifically what I did on July 9th.</p> <p>9 No, I don't.</p> <p>10 Q. Okay. But you have a good memory of</p> <p>11 the very next day, right?</p> <p>12 A. I got a -- yes, I do remember that</p> <p>13 day.</p> <p>14 Q. Okay. Let's -- so let's talk about</p> <p>15 that day.</p> <p>16 A. Okay.</p> <p>17 Q. You had glasses on that day, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And your glasses were bent on the</p> <p>20 right side that day, correct?</p> <p>21 A. They wasn't bent at first, no, but</p> <p>22 they -- yeah.</p> <p>23 Q. They -- at some point during your</p> <p>24 encounter with Chicago Police officers, your</p>
Page 195	<p>1 know you, Mr. Blair. But from what I can</p> <p>2 surmise, a regular day for you could be cutting</p> <p>3 hair, right?</p> <p>4 A. Yeah.</p> <p>5 Q. A regular day for you could be</p> <p>6 snorting heroin, correct?</p> <p>7 A. Could be, yeah.</p> <p>8 Q. Okay. A regular day for you could</p> <p>9 be --</p> <p>10 A. Doing both.</p> <p>11 Q. -- you could be looking out for</p> <p>12 police for people to sell drugs, correct?</p> <p>13 A. Correct.</p> <p>14 Q. A regular day for you could be to</p> <p>15 actually distribute narcotics, correct?</p> <p>16 A. No, I wasn't no distributor.</p> <p>17 Q. I mean, a -- you're pitching, right?</p> <p>18 A. Yeah.</p> <p>19 Q. Okay. So when I say "distribute,"</p> <p>20 I'm not talking about wholesale, okay?</p> <p>21 A. Oh.</p> <p>22 Q. I'm not trying to use a different</p> <p>23 word.</p> <p>24 A regular day for you could be</p>	Page 197	<p>1 glasses -- the right arm of your glasses was</p> <p>2 bent; is that correct?</p> <p>3 A. That's correct.</p> <p>4 Q. We're both wearing glasses, right,</p> <p>5 Mr. Blair?</p> <p>6 A. Yes, we are.</p> <p>7 Q. How bad was the right arm of your</p> <p>8 glasses bent?</p> <p>9 A. Bad enough that if -- they were wire</p> <p>10 frames, so bad enough that eventually they would</p> <p>11 be broke.</p> <p>12 Q. Okay. So -- and the person who</p> <p>13 caused them to be bent, you're claiming, is my</p> <p>14 client, correct?</p> <p>15 A. That's correct.</p> <p>16 Q. Okay. You're saying my client</p> <p>17 slapped you with what hand?</p> <p>18 A. His left hand.</p> <p>19 Q. Okay. So my client slapped you with</p> <p>20 his left hand, correct?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. And do you know whether</p> <p>23 Sergeant Watts is right-handed or left-handed?</p> <p>24 A. No, I don't.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 198</p> <p>1 Q. Okay. But that day, he struck you 2 with his left hand; is that correct? 3 MR. FLAXMAN: Objection, asked and 4 answered. 5 You can answer. 6 BY THE WITNESS: 7 A. Yes. 8 BY MR. KOSOKO: 9 Q. Okay. Bending the right arm of your 10 glasses; is that correct? 11 A. Yes. 12 Q. Okay. Were you cuffed when this 13 occurred? 14 A. No. 15 Q. Okay. When were you cuffed that day? 16 A. I was cuffed after, after that, right 17 after that. 18 Q. And who placed you in handcuffs right 19 after that? 20 A. Mohammed. 21 Q. Okay. So now let's go back to when 22 you first encountered the police. 23 Who was the very first officer you 24 encountered on July 10, 2004?</p>	<p style="text-align: right;">Page 200</p> <p>1 You, you, you, you, come here. 2 Q. All right. So hang on, Mr. Blair, so 3 we can make the record clear. 4 A. Okay. 5 Q. Was this thing you're recounting now, 6 is that something that Officer Mohammed is 7 telling you as he's bringing you into the 8 building? 9 A. Yeah. 10 Q. Okay. So Officer Mohammed -- 11 which -- how did he make physical contact with 12 you? Did he grab you by your arm? Did he grab 13 you by your wrist? Did he just put his hand to 14 your back? 15 A. He, basically, just, like -- he was, 16 like -- I mean, he put his hand on my shoulder 17 and, like, you know: Come in the building so I 18 could search you. 19 Q. Okay. So which shoulder did Officer 20 Mohammed place his hands upon? 21 A. I don't know; maybe my left shoulder. 22 Q. Okay. So Officer Mohammed placed 23 which -- which arm -- which hand of his did he 24 place on your left shoulder?</p>
<p style="text-align: right;">Page 199</p> <p>1 A. I mean, I -- it was -- the one -- the 2 very first officer -- they came as a team. It 3 wasn't no specific officer. 4 Q. Okay. Who did you have physical 5 contact with first on July 10th of 2004, which 6 police officer? 7 A. To my -- to my recollection, I think 8 it was Mohammed. 9 Q. Okay. And how about -- did Officer 10 Mohammed make physical contact with you on 11 July 10, 2004? 12 A. He -- he brought me back in the 13 building. He brought me in the building. I was 14 on the back of the building, and he brought me 15 back in the building. 16 Q. Okay. Could you describe this action 17 for us, please? Did he grab you by the arm? 18 A. He didn't grab me by the arm at 19 first. He was -- you know, they pulled up on 20 us, you know. Some people ran, some people 21 didn't. I didn't run. I continued to be -- 22 have -- stayed there having a conversation with 23 this young lady. 24 At that -- at that time, he was like:</p>	<p style="text-align: right;">Page 201</p> <p>1 A. Maybe his right hand. 2 Q. Okay. So he places his right hand on 3 your left shoulder and walks you into -- 4 A. Inside the building. 5 Q. -- is that correct? 6 A. Yes. Yes. 7 Q. Okay. And when did he seat you down? 8 A. He sat me down when he brought me -- 9 you know what I'm saying, when he brought me in 10 the building. He sat the people that was 11 already -- the few people that the other 12 officers that -- was bringing downstairs, he put 13 me on my knees right next to them. 14 Q. Okay. And Officer Mohammed faced you 15 to the wall? 16 A. Yes. 17 Q. Okay. 18 A. He put my head on the wall. 19 Q. Okay. How long -- how -- how many 20 seconds elapsed from your time getting inside 21 the 540 Building to being placed on the ground 22 in front of the wall? 23 A. I don't know; about 30 seconds, I 24 guess.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 202	<p>1 Q. Okay. So you're on the ground; is</p> <p>2 that correct?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. What's the very next thing</p> <p>5 that happened after Officer Mohammed placed you</p> <p>6 on the ground next to the other men that they</p> <p>7 already had lined up?</p> <p>8 A. They was getting people's IDs.</p> <p>9 Q. Okay. When -- when did you encounter</p> <p>10 Sergeant Watts in this?</p> <p>11 A. He was -- he was right there.</p> <p>12 Q. Okay. Now you testified earlier that</p> <p>13 the drugs that were attributed to you were on</p> <p>14 the ground; is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. How far -- how many feet away</p> <p>17 from you were those drugs?</p> <p>18 A. At least two or three feet. They</p> <p>19 weren't even by me because I was by the stairs.</p> <p>20 And it was, like -- the drugs was, like, by the</p> <p>21 door, almost maybe going outside the door.</p> <p>22 Q. All right. Mr. Blair, just listen to</p> <p>23 yourself for a second. You're saying that the</p> <p>24 drugs were only two or three feet away from you?</p>	Page 204	<p>1 wall, their hands -- their hands on the back of</p> <p>2 their heads like this, and their foreheads</p> <p>3 against the wall.</p> <p>4 I didn't -- I can't tell you -- I was</p> <p>5 the last person in there. So I'm at the end of</p> <p>6 the line. They going down the row.</p> <p>7 BY MR. KOSOKO:</p> <p>8 Q. Okay. All right. So you're at the</p> <p>9 end of the line, right?</p> <p>10 A. Mm-hm.</p> <p>11 Q. There's another man to your right or</p> <p>12 to your left?</p> <p>13 A. To my right.</p> <p>14 Q. Okay. There's another man -- so</p> <p>15 you're the last one on the line to the left; is</p> <p>16 that right?</p> <p>17 A. I'm the left -- yeah. When -- yeah.</p> <p>18 Q. There's a man to your --</p> <p>19 A. I'm -- I'm, like, by the lobby door,</p> <p>20 by the entrance to the lobby, okay. It's, like,</p> <p>21 two steps right there, right. I'm the first</p> <p>22 person --</p> <p>23 Q. Okay.</p> <p>24 A. -- which was -- which means I was the</p>
Page 203	<p>1 A. Yeah.</p> <p>2 Q. Okay. How far was the door away from</p> <p>3 you?</p> <p>4 A. Like -- I don't know; like, about,</p> <p>5 what, five feet.</p> <p>6 Q. Okay. When you were sat down by</p> <p>7 Officer Mohammed, did you see this bundle of</p> <p>8 drugs two to three feet away from you?</p> <p>9 A. Not at first, no. I didn't see --</p> <p>10 no, I didn't see it.</p> <p>11 Q. Okay. So the -- your first encounter</p> <p>12 with Sergeant Watts is when he said: Those are</p> <p>13 your drugs; is that right?</p> <p>14 MR. FLAXMAN: Objection. You're misstating</p> <p>15 his testimony.</p> <p>16 BY THE WITNESS:</p> <p>17 A. No, I didn't tell you that.</p> <p>18 BY MR. KOSOKO:</p> <p>19 Q. Okay. When was the first time</p> <p>20 Sergeant Watts came up to you when you were on</p> <p>21 the ground?</p> <p>22 A. He -- he didn't -- he didn't come up</p> <p>23 to me when I was on the ground. When I was on</p> <p>24 the ground, everybody had they foreheads on the</p>	Page 205	<p>1 last person. I could have been either the last</p> <p>2 person or the first person --</p> <p>3 Q. I got it.</p> <p>4 A. -- I was the last person to get let</p> <p>5 go, but I was, like, the first person right</p> <p>6 there.</p> <p>7 Q. Okay. How many of you all were lined</p> <p>8 up on the wall?</p> <p>9 A. I don't know; maybe 10 --</p> <p>10 Q. Okay.</p> <p>11 A. -- 12. I don't know. Something like</p> <p>12 that.</p> <p>13 Q. Okay. How long after you were on the</p> <p>14 ground did Sergeant Watts come up to you?</p> <p>15 A. He came up to me after -- after --</p> <p>16 whoever, like -- whoever they ran for warrants</p> <p>17 and whoever had a warrant, they -- you know, the</p> <p>18 other officers took them. And I was -- Officer</p> <p>19 Watts asked Mohammed: Did you search him?</p> <p>20 Officer Mohammed said: Yeah.</p> <p>21 Officer Watts said: Search him</p> <p>22 again --</p> <p>23 Q. Okay. Listen to my question,</p> <p>24 Mr. Blair. How long after you were on the</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 206	<p>1 ground did Sergeant Watts come to you?</p> <p>2 A. I can't -- I don't -- I don't</p> <p>3 remember. Maybe, what, ten minutes, I guess.</p> <p>4 Q. So it is your belief that you were on</p> <p>5 the ground with your head faced upon the wall</p> <p>6 for at least ten minutes?</p> <p>7 A. At least ten minutes, yeah.</p> <p>8 Q. Okay. How many of you all were lined</p> <p>9 up on the wall?</p> <p>10 A. I just told you about maybe about 12</p> <p>11 of us.</p> <p>12 Q. 12 again, right?</p> <p>13 A. Mm-hm.</p> <p>14 Q. Okay. And you testified earlier that</p> <p>15 there were only four to five officers; is that</p> <p>16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. So what is the first thing</p> <p>19 that Sergeant Watts said to you when he got near</p> <p>20 you?</p> <p>21 A. The first thing he said to me was,</p> <p>22 he's -- he was like: Man, is them yours?</p> <p>23 I'm like: No, that's not mine.</p> <p>24 He's like: Yes, it is.</p>	Page 208	<p>1 he just told Mohammed to search me again.</p> <p>2 Q. Okay. So you're standing up,</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. And Officer Mohammed is the one who's</p> <p>6 searching you, correct?</p> <p>7 A. He searched me again.</p> <p>8 Q. Okay. Did he turn you away from the</p> <p>9 wall or are you still facing the wall?</p> <p>10 A. He put me -- first -- when he -- I</p> <p>11 put my hands back -- he stood me up. I put my</p> <p>12 hands on the wall. I spread my legs. He</p> <p>13 searched me again like they search people. And</p> <p>14 I -- you know what I'm saying. I turned around.</p> <p>15 I ain't have nothing. But it was some drugs on</p> <p>16 the ground. When --</p> <p>17 Q. Okay. So -- hang on. So you turn</p> <p>18 around at that point; is that --</p> <p>19 A. Yeah.</p> <p>20 Q. -- correct?</p> <p>21 A. Yeah.</p> <p>22 Q. So where is Sergeant Watts in</p> <p>23 relation to Officer Mohammed at this very</p> <p>24 moment?</p>
Page 207	<p>1 I'm like: Man, I ain't have that</p> <p>2 shit.</p> <p>3 And when I said "I ain't have shit,"</p> <p>4 he smacked me.</p> <p>5 Q. Okay. So your head is against the</p> <p>6 wall; is that correct?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. Sergeant Watts slaps you with</p> <p>9 his left hand; is that correct?</p> <p>10 A. Yeah.</p> <p>11 Q. Okay. Hitting the right side of your</p> <p>12 glasses; is that correct?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Describe this for me, please.</p> <p>15 A. Describe it for you?</p> <p>16 Q. Uh-huh.</p> <p>17 A. I'm in -- Me and him are face to</p> <p>18 face.</p> <p>19 Q. Uh-huh. So --</p> <p>20 A. We --</p> <p>21 Q. Hang on. Hang on. So you're no</p> <p>22 longer facing the wall at this point; is that</p> <p>23 correct?</p> <p>24 A. No. I'm -- I'm stood up now because</p>	Page 209	<p>1 A. They right in front of me.</p> <p>2 Q. Okay. So when did Sergeant Watts</p> <p>3 allegedly slap you with his left hand?</p> <p>4 A. When I told him that shit wasn't</p> <p>5 mine.</p> <p>6 Q. Okay. And your glasses fell to the</p> <p>7 ground; is that correct?</p> <p>8 A. Well, I mean, they didn't -- yeah.</p> <p>9 Yeah, he knocked my glasses off my face, yeah --</p> <p>10 Q. When did you --</p> <p>11 A. -- he knocked my glasses off my</p> <p>12 face -- huh?</p> <p>13 Q. When did you pick your glasses up?</p> <p>14 A. After he knocked them off my face.</p> <p>15 Q. How long after he knocked them off</p> <p>16 your face did you pick them up?</p> <p>17 A. I don't know. After I was like:</p> <p>18 Man, for real, I -- I was like: Man, you had --</p> <p>19 for what? I mean, I'm like: For real, man?</p> <p>20 You going to slap me. For what? What you --</p> <p>21 you know what I'm saying. What's that for?</p> <p>22 Q. Mm-hm.</p> <p>23 A. And when I said that, I picked up my</p> <p>24 glasses.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 210	<p>1 Q. Okay. So did you --</p> <p>2 A. He's like: Man --</p> <p>3 Q. -- bend down to pick up your glasses?</p> <p>4 A. Yeah, yeah.</p> <p>5 Q. How far away were your glasses from</p> <p>6 you?</p> <p>7 A. They was, like -- I don't know. They</p> <p>8 was, like, maybe a foot or so right by me. They</p> <p>9 didn't go far.</p> <p>10 Q. Okay. And when did you fix your</p> <p>11 glasses?</p> <p>12 A. When I got in the station.</p> <p>13 Q. Okay. When were you placed in cuffs?</p> <p>14 A. After he smacked me.</p> <p>15 Q. Okay. When was the next time you're</p> <p>16 not in cuffs?</p> <p>17 A. After I got -- well, I was still in</p> <p>18 cuffs, but they had me chained to the -- you</p> <p>19 know how they have you -- when you're sitting on</p> <p>20 the bench, they had me chained -- cuffed to the</p> <p>21 wall.</p> <p>22 Q. Mm-hm. And it's at this point that</p> <p>23 you fixed your glasses; is that correct?</p> <p>24 A. Yeah, the -- yeah. I mean, I just --</p>	Page 212	<p>1 A. I'm -- I just remember he's a Black</p> <p>2 guy. I don't remember who it was. I</p> <p>3 remember -- I think it could have been, like,</p> <p>4 Officer Jones maybe.</p> <p>5 Q. Okay. So can you describe Officer</p> <p>6 Jones for us, please?</p> <p>7 A. I can't give you a full description</p> <p>8 of him. I just know he -- he was a Black -- is</p> <p>9 a Black officer -- was a Black officer. He is a</p> <p>10 Black officer.</p> <p>11 Q. All right. What was the race of the</p> <p>12 judge that handled your preliminary hearing?</p> <p>13 A. Black -- I mean -- I mean -- let me</p> <p>14 take that back. Let me take that back.</p> <p>15 Did I have a white -- I think it was</p> <p>16 a white guy who had my preliminary hearing. I</p> <p>17 think it was a white guy if I'm not --</p> <p>18 Q. You --</p> <p>19 A. -- mistaken.</p> <p>20 Q. -- white male judge for the</p> <p>21 preliminary hearing?</p> <p>22 A. Preliminary hearing, yeah, yeah.</p> <p>23 Q. What was the -- describe your public</p> <p>24 defender that was appointed to represent you for</p>
Page 211	<p>1 I mean, I bent them back, yeah.</p> <p>2 Q. Okay. You bent them back. Okay.</p> <p>3 So did you tell your public defender</p> <p>4 any of this?</p> <p>5 A. Yeah, I believe I did, Yeah. Yes, I</p> <p>6 did.</p> <p>7 Q. Okay. Let's talk about July 27th of</p> <p>8 2004.</p> <p>9 Did you have a -- were you present</p> <p>10 for the preliminary hearing in this matter?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Did Sergeant Watts testify</p> <p>13 against you in the preliminary hearing?</p> <p>14 A. I don't think so.</p> <p>15 Q. Okay. Did you see Sergeant Watts in</p> <p>16 court at all for the preliminary hearing?</p> <p>17 A. No.</p> <p>18 Q. Okay. Which officer testified</p> <p>19 against you in the preliminary hearing?</p> <p>20 A. I -- I don't know what's his name. I</p> <p>21 don't remember his name, but --</p> <p>22 Q. Can you describe the officer that</p> <p>23 testified against you in the preliminary</p> <p>24 hearing?</p>	Page 213	<p>1 the preliminary hearing.</p> <p>2 A. I think he was a white guy, too, but</p> <p>3 I don't -- I don't know if the -- my -- the</p> <p>4 public defender -- I don't remember if the</p> <p>5 public defender that was at my preliminary</p> <p>6 hearing was the same public defender that I had</p> <p>7 while I was fighting the case.</p> <p>8 Q. Yeah, I understand that. I'm --</p> <p>9 A. So I (unreportable cross-talk) --</p> <p>10 Q. -- just asking you --</p> <p>11 A. -- judge.</p> <p>12 Q. -- what you remember.</p> <p>13 A. Right.</p> <p>14 Q. So do you remember if it was a male</p> <p>15 or a female?</p> <p>16 A. Oh, it was a male.</p> <p>17 Q. It was -- you're positive that the</p> <p>18 public defender was a male?</p> <p>19 A. Yeah.</p> <p>20 Q. Okay. What about the State's</p> <p>21 Attorney; was it a male or a female?</p> <p>22 A. I think the State's Attorney was a</p> <p>23 white female.</p> <p>24 Q. Okay. So you remember sitting for</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 214	Page 216
<p>1 this preliminary hearing and watching the 2 testimony, correct? 3 A. And what? 4 Q. And watching the testimony, correct? 5 A. Well, yeah. 6 Q. What is the substance of what Officer 7 Jones stated as to why there was probable cause 8 to arrest you? 9 A. I don't know. 10 Q. Isn't it true that Officer Jones 11 stated that he and his partner saw you pitching 12 that day? 13 A. No -- 14 MR. FLAXMAN: Objection, foundation. 15 BY THE WITNESS: 16 A. No, they did not -- if they -- 17 they -- well, first of all, they could have 18 never saw me pitching anything because if I was 19 pitching, I would be in the building. And how 20 can they see me pitching if I'm in the building? 21 They could never see me pitching. 22 BY MR. KOSOKO: 23 Q. All right. 24 A. They couldn't see me pitching if I</p>	<p>1 A. Yes. 2 Q. You see your case number? 3 A. Yes. 4 Q. Okay. Do you see that it was 5 actually before an Irish female by the name of 6 Maura Boyle? 7 MR. FLAXMAN: Objection, foundation. 8 BY THE WITNESS: 9 A. I see it. 10 BY MR. KOSOKO: 11 Q. So it wasn't -- it wasn't a male, 12 correct? It was a female judge, correct? 13 A. It's a fe -- yeah, a female, a 14 female judge -- 15 Q. Okay. And -- 16 A. -- a white judge. 17 Q. -- do you remember Ms. Julia [sic] 18 Payne represented you that day? 19 A. I don't -- no, I don't remember. 20 Q. Okay. Do you remember your bond 21 hearing? 22 A. That's -- that is the bond hearing. 23 That's the bond hearing what we're talking about 24 right now.</p>
Page 215	Page 217
<p>1 was pitching, but I wasn't pitching that day. I 2 was standing outside. 3 Q. All right. Um -- 4 A. Do you understand what I'm saying? 5 MR. FLAXMAN: Just let him ask a question. 6 It's all right. Just answer the question. 7 Don't worry. 8 BY MR. KOSOKO: 9 Q. I'm going to screen-share this 10 exhibit for you, Mr. Blair. 11 (WHEREUPON, Watts Exhibit No. 1 was 12 presented to the witness.) 13 BY MR. KOSOKO: 14 Q. We'll mark it as Watts Exhibit 1, 15 PL JOINT DO JOINT 20102 [sic]. 16 Can you see that document, Mr. Blair? 17 A. Yes, I see it. 18 Q. Do you see that -- it's the 19 transcript from the preliminary hearing in 20 the -- 21 A. Yes. 22 Q. -- case? 23 A. Yeah. Yes, I see it. 24 Q. You see your name, correct?</p>	<p>1 Q. No. I'm talking about the 2 preliminary hearing -- 3 A. This is the -- 4 Q. -- not the bond hearing. Your bond 5 hearing would have been the very next day. Do 6 you remember that? 7 A. Oh, okay. 8 Q. If you don't remember, it's -- 9 A. -- I'm not -- 10 Q. -- fine. As -- 11 (Unreportable cross-talk.) 12 BY MR. KOSOKO: 13 Q. -- Ms. West stated earlier, if you 14 don't remember, it's fine to say you don't 15 remember. I'm not trying to trick you up, 16 all right? 17 A. Okay. I don't -- I don't remember. 18 Q. Okay. So you don't remember -- you 19 don't remember anything about the public 20 defender that represented you for your bond 21 hearing, correct? 22 A. No. 23 Q. Okay. Do you remember the State's 24 Attorney that was in bond court that day?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 218

1 A. No, I don't --

2 **Q. Do you remember the judge that set**

3 **your bond the very next --**

4 MR. FLAXMAN: Objection. He's already told

5 you. He doesn't remember the hearing. Why do

6 you have to ask about every single thing about

7 it?

8 MR. KOSOKO: Because I'm going to make my

9 record, Joel, because he seems to remember

10 specifically the arrest but nothing before or

11 after. If I have to explain my strategy to you,

12 that's why.

13 BY MR. KOSOKO:

14 **Q. So you don't remember anything about**

15 **the day after, correct?**

16 MR. FLAXMAN: I object to the foundation.

17 The day after what? Ask him a proper question

18 and he'll --

19 BY MR. KOSOKO:

20 **Q. On July 11, 2004, what was the race**

21 **and sex of the judge that you had your bond**

22 **hearing in front of?**

23 MR. FLAXMAN: Objection, asked and

24 answered.

Page 219

1 BY THE WITNESS:

2 A. I do -- I don't remember.

3 BY MR. KOSOKO:

4 **Q. Okay. So now we'll fast-forward to**

5 **July 27th of 2004.**

6 **Do you recall Officer Jones being**

7 **asked this question and him giving this**

8 **response:**

9 **[As read] "What did you see the**

10 **defendant doing that date, time,**

11 **and location?**

12 **"ANSWER: I saw him conduct three**

13 **hand-to-hand narcotics**

14 **transactions."**

15 **Do you remember him being asked that**

16 **question and giving that response?**

17 MR. FLAXMAN: And before you answer, I'm

18 going to state my objection that he's already

19 told you he does not recall the substance of

20 Officer Jones' testimony.

21 MR. KOSOKO: Your record -- your -- I

22 guess, your objection is noted, Joel.

23 BY MR. KOSOKO:

24 **Q. Does this refresh your**

Page 220

1 **recollection --**

2 MR. FLAXMAN: That's why I'm making it, to

3 note it.

4 MR. KOSOKO: Perfect.

5 BY MR. KOSOKO:

6 **Q. You've got to answer my question,**

7 **Mr. Blair.**

8 A. Okay.

9 MR. FLAXMAN: He wants to know do you

10 remember him testifying to that?

11 BY THE WITNESS:

12 A. I don't remember him specifically

13 saying this. No, I don't remember.

14 But me seeing it, I guess, he did.

15 BY MR. KOSOKO:

16 **Q. Okay. Now, did you ever tell your**

17 **public defender that -- the story you're saying**

18 **now, which is that Sergeant Watts said drugs**

19 **that they found on the ground were the drugs**

20 **that were being attributed to you?**

21 A. Yeah, I told them, yeah.

22 **Q. Okay. Did you tell Mr. Labrador that**

23 **that is what happened?**

24 MR. FLAXMAN: Objection, asked and

Page 221

1 answered.

2 BY THE WITNESS:

3 A. That's what I remember telling him.

4 BY MR. KOSOKO:

5 **Q. Okay. Now, did you tell**

6 **Mr. Labrador this -- Mr. Labrador is the PD that**

7 **was appointed to fight the case after the**

8 **prelim, correct?**

9 A. Yes, I -- yeah, I guess, yes. But --

10 and --

11 **Q. All right. Let's go back for a**

12 **second, Mr. Blair.**

13 A. If you go back -- okay. Go ahead.

14 **Q. Okay. The same public defender did**

15 **not represent you for your bond hearing,**

16 **correct?**

17 A. Correct.

18 MR. FLAXMAN: Objection, foundation.

19 BY MR. KOSOKO:

20 **Q. Okay. The same public defender that**

21 **handled your bond hearing did not do your**

22 **prelim, correct?**

23 A. Correct.

24 **Q. Okay. And Mr. Labrador did neither**

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 222</p> <p>1 your bond hearing or your prelim, correct?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. You were appointed</p> <p>4 Mr. Labrador after you were arraigned; is that</p> <p>5 correct?</p> <p>6 A. That's correct.</p> <p>7 Q. Did you tell Mr. Labrador the story</p> <p>8 that you are relaying today regarding --</p> <p>9 A. As far as --</p> <p>10 Q. -- (unreportable cross-talk) --</p> <p>11 A. -- I remember, yes.</p> <p>12 Q. Okay. When is the first time you</p> <p>13 told Mr. Labrador that you were actually being</p> <p>14 framed for drugs that they found on the ground?</p> <p>15 A. Because after -- I told him that</p> <p>16 after I saw -- I told him about -- and the</p> <p>17 reason that he got those pictures, I was like no</p> <p>18 way.</p> <p>19 First of all, I wasn't inside the</p> <p>20 building; and if I was inside the building,</p> <p>21 there's no way they could see me making three</p> <p>22 transactions if they were outside the building</p> <p>23 and I was inside the building. It's no way that</p> <p>24 they could see that --</p>	<p style="text-align: right;">Page 224</p> <p>1 A. The only thing I can -- the only</p> <p>2 thing I remember is just stating that: You</p> <p>3 need -- we was -- we was -- I was telling him</p> <p>4 that he needed to go take some pictures because</p> <p>5 there's no way they could see me doing anything.</p> <p>6 If I was inside the building and I was doing</p> <p>7 something, he could no way see -- it's no way</p> <p>8 that he could see me doing any kind of pitching</p> <p>9 or anything. That's number one.</p> <p>10 And I remember telling him: And I</p> <p>11 wasn't even inside the building. I was outside</p> <p>12 the building.</p> <p>13 Q. Okay. Mr. Blair, you had a</p> <p>14 discussion about the evidence -- the sufficiency</p> <p>15 of the evidence against you; is that correct?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. When did you tell your client</p> <p>18 [sic] that you were being framed by my client,</p> <p>19 Ronald Watts?</p> <p>20 A. I don't -- I don't remember me</p> <p>21 telling him I was being framed. I just told him</p> <p>22 that those drugs wasn't mine --</p> <p>23 Q. Okay. Isn't it true --</p> <p>24 A. -- that's what I told him.</p>
<p style="text-align: right;">Page 223</p> <p>1 Q. All right.</p> <p>2 A. -- there's no way.</p> <p>3 Q. Mr. Blair, listen to my question,</p> <p>4 okay?</p> <p>5 When did you tell Mr. Labrador the</p> <p>6 story that you're saying today, which is that</p> <p>7 Sergeant Watts attributed narcotics that he saw</p> <p>8 on the ground to you?</p> <p>9 MR. FLAXMAN: Objection, form.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't remember what -- what -- at</p> <p>12 what time of the -- or which day we went to</p> <p>13 court because we went to -- I went to court</p> <p>14 quite a few times on this case.</p> <p>15 BY MR. KOSOKO:</p> <p>16 Q. Mr. Blair, do you remember using the</p> <p>17 words "Ronald" and "Watts" when talking to</p> <p>18 Mr. Labrador at any point?</p> <p>19 A. Huh?</p> <p>20 Q. Did you ever even mention my client</p> <p>21 to Mr. Labrador?</p> <p>22 A. I -- Yeah. Of course. I had to.</p> <p>23 Q. And when you brought up my client,</p> <p>24 what did you say to Mr. Labrador about it?</p>	<p style="text-align: right;">Page 225</p> <p>1 Q. Isn't it true, Mr. Blair, that you</p> <p>2 never brought up Sergeant Watts with</p> <p>3 Mr. Labrador?</p> <p>4 MR. FLAXMAN: Objection, misstating his</p> <p>5 testimony, asked and answered.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I told my -- the PD -- I told the PD</p> <p>8 that the drugs Sergeant Watts said he got off</p> <p>9 me, off my person was not on me. I didn't have</p> <p>10 no drugs. I didn't work that day or none of</p> <p>11 that. He didn't -- did nobody see me make no</p> <p>12 three transactions or none of that. It's</p> <p>13 impossible.</p> <p>14 BY MR. KOSOKO:</p> <p>15 Q. Okay. What if the officers are</p> <p>16 saying they saw you make three transactions</p> <p>17 outside of the building?</p> <p>18 A. Because we don't serve -- we didn't</p> <p>19 serve outside the building.</p> <p>20 THE WITNESS: Excuse me.</p> <p>21 BY THE WITNESS:</p> <p>22 A. We didn't serve -- we didn't -- we</p> <p>23 didn't sell outside the building.</p> <p>24</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 226	<p>1 BY MR. KOSOKO:</p> <p>2 Q. Okay. But that was the evidence</p> <p>3 against you in this matter, was that they saw</p> <p>4 you serving outside of the building, correct?</p> <p>5 A. Yeah. Correct.</p> <p>6 Q. When did you tell your attorney that</p> <p>7 you never served outside of the building and it</p> <p>8 was all made up by Sergeant Watts?</p> <p>9 MR. FLAXMAN: Objection --</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't --</p> <p>12 MR. FLAXMAN: -- foundation --</p> <p>13 BY THE WITNESS:</p> <p>14 A. I don't --</p> <p>15 MR. FLAXMAN: -- asked and answered.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I don't remember. I don't know if I</p> <p>18 said Sergeant Watts saw me make trans- -- three</p> <p>19 transactions. I don't know if I said Sergeant</p> <p>20 Watts -- all I said, I -- the only thing I said</p> <p>21 was: It's no way. No officer could have seen</p> <p>22 me make no transactions.</p> <p>23 That's the only thing I said.</p> <p>24 Q. Well, Sergeant Watts never -- never</p>	Page 228	<p>1 case on May 31, 2005?</p> <p>2 A. I don't --</p> <p>3 MR. FLAXMAN: Object- --</p> <p>4 BY THE WITNESS:</p> <p>5 A. I don't remember what officer.</p> <p>6 BY MR. KOSOKO:</p> <p>7 Q. You were present for that hearing,</p> <p>8 correct, Mr. Blair?</p> <p>9 A. Yeah, I was present, yes.</p> <p>10 Q. Now, that hearing was in front of a</p> <p>11 different judge; is that right?</p> <p>12 MR. FLAXMAN: Objection, form.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Motion was -- no --</p> <p>15 BY MR. KOSOKO:</p> <p>16 Q. You're right --</p> <p>17 A. -- that hearing was in front of the</p> <p>18 judge that I was arraigned to.</p> <p>19 Q. Correct. Right? Not Judge Boyle,</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. You were in front of Judge Laws at</p> <p>23 this point, correct?</p> <p>24 A. Correct.</p>
Page 227	<p>1 initiated criminal proceedings against you,</p> <p>2 correct?</p> <p>3 MR. FLAXMAN: Objection, foundation.</p> <p>4 BY THE WITNESS:</p> <p>5 A. I don't know.</p> <p>6 BY MR. KOSOKO:</p> <p>7 Q. Okay. Did Sergeant Watts testify at</p> <p>8 your preliminary hearing?</p> <p>9 A. Not that I know of, no.</p> <p>10 Q. Okay. You had a motion to suppress</p> <p>11 the evidence against you in this case, too,</p> <p>12 correct?</p> <p>13 A. That's correct.</p> <p>14 Q. Okay. And that occurred on May 31st</p> <p>15 of 2005, correct?</p> <p>16 MR. FLAXMAN: Objection, foundation.</p> <p>17 BY THE WITNESS:</p> <p>18 A. Correct.</p> <p>19 BY MR. KOSOKO:</p> <p>20 Q. Okay. Did Sergeant Watts testify in</p> <p>21 that matter?</p> <p>22 A. I don't think so, no.</p> <p>23 Q. Okay. Who testified regarding the</p> <p>24 narcotics, the evidence against you, in this</p>	Page 229	<p>1 Q. Okay. Can you describe Judge Laws</p> <p>2 for me?</p> <p>3 A. Judge Laws is a Black female judge.</p> <p>4 Q. Correct. Marjorie Laws, correct?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. You testified earlier that</p> <p>7 Marjorie Laws said that if you were found guilty</p> <p>8 after trial, that she could sentence you between</p> <p>9 the minimum and the maximum range, correct?</p> <p>10 A. No, I said she said that if I'm found</p> <p>11 guilty, that she was going to give me the max.</p> <p>12 Q. Okay. It's your testimony under oath</p> <p>13 today that Judge Marjorie Laws testified -- made</p> <p>14 a statement in open court that she would give</p> <p>15 you the max if you took the matter to trial?</p> <p>16 MR. FLAXMAN: Objection, you're misstating</p> <p>17 his testimony.</p> <p>18 BY THE WITNESS:</p> <p>19 A. I said Ms. Laws said if -- if I go to</p> <p>20 trial and I'm found guilty, that she could give</p> <p>21 me the 15 years, which the case carried 4 to 15.</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q. Okay. She said she could sentence</p> <p>24 you up to that, correct?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 230	<p>1 A. Yeah.</p> <p>2 Q. She didn't say she would sentence you</p> <p>3 to that, correct?</p> <p>4 A. I don't -- well, I can't remember if</p> <p>5 she said she would, she could.</p> <p>6 I was under the impression that if</p> <p>7 she found me guilty, that she probably would.</p> <p>8 Q. Okay. Did you have a discussion with</p> <p>9 Mr. Labrador about this?</p> <p>10 A. Yeah. I -- yeah, I'm quite sure I</p> <p>11 did, yeah.</p> <p>12 Q. And Mr. Labrador said that you</p> <p>13 could -- you would get 15 years for this</p> <p>14 offense if you --</p> <p>15 A. No. He said --</p> <p>16 Q. -- went to trial?</p> <p>17 A. He just told me what the case</p> <p>18 carried. He didn't, you know -- he didn't say</p> <p>19 what -- I mean, what I could get. But he</p> <p>20 just -- he explained to me what -- you know, how</p> <p>21 much time I was facing if I took it to trial and</p> <p>22 lost.</p> <p>23 Q. All right. Now, prior to -- prior to</p> <p>24 any of this happening, correct, your --</p>	Page 232	<p>1 he was trying to, you know -- he was trying to,</p> <p>2 you know, get my -- the evidence suppressed</p> <p>3 and -- I mean, he called -- he was working. I</p> <p>4 mean, he was doing his job as a PD. That's the</p> <p>5 only thing I could tell you.</p> <p>6 Q. Okay. So you'd say Mr. Labrador was</p> <p>7 trying hard, correct?</p> <p>8 A. I mean, for the most part, yeah.</p> <p>9 Q. Okay. Did you tell Mr. Labrador that</p> <p>10 you had witnesses?</p> <p>11 A. I don't remember if I did or didn't.</p> <p>12 I can't remember. But I don't -- I don't</p> <p>13 think -- there wasn't no witnesses going to come</p> <p>14 to court.</p> <p>15 Q. Well, what about -- what about Step</p> <p>16 Light? Did you ever mention Stephanie Watson at</p> <p>17 all to Mr. Labrador?</p> <p>18 A. Not -- I -- I don't think so.</p> <p>19 Q. Why not?</p> <p>20 A. Because I don't think -- because I</p> <p>21 don't think he would have been able to find her,</p> <p>22 first of all. And, you know, I didn't really --</p> <p>23 I really thought that I didn't even need her as</p> <p>24 a witness at that point.</p>
Page 231	<p>1 Mr. Labrador attempted to resolve this matter</p> <p>2 short of trial, correct?</p> <p>3 A. Yes, correct.</p> <p>4 Q. He tried to get the best deal for</p> <p>5 you, correct?</p> <p>6 A. Correct.</p> <p>7 Q. Okay. When -- was this before you</p> <p>8 told him -- I'll withdraw that question.</p> <p>9 Mr. Labrador sought to have you cop</p> <p>10 out after you told him you were getting framed;</p> <p>11 is that correct?</p> <p>12 A. No, he -- I -- I can't remember if it</p> <p>13 was before or after, but at some point, yeah,</p> <p>14 we -- we -- we talked about -- he talked about</p> <p>15 did I want to take three years.</p> <p>16 Q. Okay. Did you tell Mr. Labrador that</p> <p>17 Sergeant Watts made all this stuff up about the</p> <p>18 three transactions?</p> <p>19 A. I told him -- yeah, I told him that,</p> <p>20 and I told him that it wasn't mine. And I --</p> <p>21 Q. What else did you tell Mr. Labrador</p> <p>22 about the circumstances of that day?</p> <p>23 A. I mean, we -- me and Mr. Labrador, we</p> <p>24 had conversations about many of things because</p>	Page 233	<p>1 Q. Mr. Blair, did you say anything about</p> <p>2 being with Fat Man?</p> <p>3 A. No.</p> <p>4 Q. Okay. Did you ever mention someone</p> <p>5 by the name of Fat Man to Mr. Labrador?</p> <p>6 A. No.</p> <p>7 Q. Did you ever tell Mr. Labrador that</p> <p>8 you and Fat Man were arrested?</p> <p>9 A. I don't -- no, I couldn't have</p> <p>10 told -- I didn't tell my attorney that, my PD</p> <p>11 that. I did not tell him that because I didn't</p> <p>12 know that Fat Man was arrested at -- when we --</p> <p>13 when I was arrested, at that time, I didn't know</p> <p>14 he was arrested, too.</p> <p>15 Q. Okay. Did you ever -- during the</p> <p>16 pendency of the criminal proceedings at issue in</p> <p>17 this case ever say anything about Fat Man to</p> <p>18 Mr. Labrador?</p> <p>19 A. Not that I recall, no.</p> <p>20 Q. Do you recall what Mr. Labrador</p> <p>21 related to you regarding what happened after the</p> <p>22 402 conference?</p> <p>23 A. No, I don't.</p> <p>24 Q. Did you try to get the charges</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 234</p> <p>1 against you reduced?</p> <p>2 A. Did he try to?</p> <p>3 Q. Yeah. Did you want him to?</p> <p>4 A. No, I wanted him to beat the case.</p> <p>5 Q. Okay. Were you willing to take TASC</p> <p>6 probation if it was offered to you?</p> <p>7 A. No, I wanted him to beat the case.</p> <p>8 Q. On September 23rd of '04, were you</p> <p>9 still in custody for this matter?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And they would bring you from</p> <p>12 the Cook County -- from the division up to Judge</p> <p>13 Laws' courtroom, correct?</p> <p>14 A. That's correct.</p> <p>15 Q. Do you remember what room Judge Laws</p> <p>16 was back then?</p> <p>17 A. No, I don't.</p> <p>18 Q. Okay. And where would you be prior</p> <p>19 to your case being called?</p> <p>20 A. Where -- pardon me?</p> <p>21 Q. Where would you be located prior to</p> <p>22 your case being called before they brought you</p> <p>23 in open court?</p> <p>24 A. I would be in the court -- in the</p>	<p style="text-align: right;">Page 236</p> <p>1 for your TASC evaluation?</p> <p>2 A. I think I do.</p> <p>3 Q. Okay. Was that before the motion to</p> <p>4 suppress hearing?</p> <p>5 A. I don't remember if it was before or</p> <p>6 after.</p> <p>7 Q. Okay. And do you remember what --</p> <p>8 what -- were you recommended for TASC probation?</p> <p>9 A. I don't think so.</p> <p>10 Q. Okay. So you didn't want any</p> <p>11 probation at all in this matter; you wanted the</p> <p>12 charges to be beat outright, correct?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Isn't it true that you had a</p> <p>15 402 conference in this matter? Right?</p> <p>16 A. Right.</p> <p>17 Q. Okay. And you know what a 402,</p> <p>18 right, is, Mr. Blair?</p> <p>19 A. Yeah.</p> <p>20 Q. Okay. Could you tell us what a 402</p> <p>21 is?</p> <p>22 A. It's a -- a 402 is a conference with</p> <p>23 me, the judge, and my PD, I think.</p> <p>24 Q. Okay. And what happens during a 402</p>
<p style="text-align: right;">Page 235</p> <p>1 courtroom lockup.</p> <p>2 Q. Okay. In the back, correct?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay. Was Judge Laws' courtroom, was</p> <p>5 it a fishbowl room or one of the bigger rooms?</p> <p>6 A. Judge Laws, I think she -- I think</p> <p>7 she had one of the bigger courtrooms.</p> <p>8 Q. Okay. And so when would you talk to</p> <p>9 Mr. Labrador?</p> <p>10 A. I would talk to him when I -- when he</p> <p>11 came -- when I was -- on my court day, he'd come</p> <p>12 back to talk to me back there in lockup.</p> <p>13 Q. Okay. So Mr. Labrador, prior to your</p> <p>14 case being called, he would come back there and</p> <p>15 talk to you about what -- what would happen in</p> <p>16 court and what the status is --</p> <p>17 A. What --</p> <p>18 Q. -- right?</p> <p>19 A. -- we're going to do today in court,</p> <p>20 what -- you know, what he was going to try to do</p> <p>21 or, you know -- or how -- you know, he just --</p> <p>22 excuse me. He would explain to me what -- what</p> <p>23 was going to happen today in court.</p> <p>24 Q. Do you remember when you were -- went</p>	<p style="text-align: right;">Page 237</p> <p>1 conference?</p> <p>2 A. I don't -- I don't recall what really</p> <p>3 happens. I know we talk about the case and</p> <p>4 something --</p> <p>5 Q. Okay.</p> <p>6 A. -- something dealing with the case.</p> <p>7 Q. Is it your testimony that</p> <p>8 Mr. Labrador presented a different set of facts</p> <p>9 than the three-transactions facts?</p> <p>10 A. Is it -- I -- can you repeat that</p> <p>11 question?</p> <p>12 Q. What did you -- what did Mr. Labrador</p> <p>13 believe the evidence against you was?</p> <p>14 MR. FLAXMAN: Objection, foundation.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I don't -- I don't know. I don't</p> <p>17 remember what he believed what -- what the</p> <p>18 evidence was.</p> <p>19 BY MR. KOSOKO:</p> <p>20 Q. Okay. Did Mr. Labrador proceed with</p> <p>21 this matter as if the evidence against you was</p> <p>22 that Officer Jones and Officer Young saw you</p> <p>23 make three hand-to-hand transactions?</p> <p>24 MR. FLAXMAN: Objection, foundation.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 238	<p>1 BY THE WITNESS:</p> <p>2 A. I don't -- I -- yeah, I guess, yeah,</p> <p>3 if that's what he was basing -- if that's what</p> <p>4 he was fighting against.</p> <p>5 I mean, I told him that, that it was</p> <p>6 impossible for him to -- for either -- either</p> <p>7 officer to -- if I was inside the building, it</p> <p>8 would have been impossible for them to see me</p> <p>9 make three transactions. You cannot see nobody</p> <p>10 in that building make no three transactions.</p> <p>11 That's bogus.</p> <p>12 BY MR. KOSOKO:</p> <p>13 Q. Okay. I mean, that's -- I understand</p> <p>14 what you're saying, Mr. -- Mr. -- Mr. Blair, but</p> <p>15 Officer Young and Officer Jones believe they saw</p> <p>16 you do that outside of the building.</p> <p>17 Is it possible to see somebody do</p> <p>18 that outside of the building?</p> <p>19 A. I mean, yeah, but we -- why would we</p> <p>20 work outside the building that -- if we know</p> <p>21 that's -- I mean -- and we know that it's</p> <p>22 possible that an officer can see you make a</p> <p>23 transaction? I mean, that -- how smart is that?</p> <p>24 I mean, when the building -- the</p>	Page 240	<p>1 BY THE WITNESS:</p> <p>2 A. I don't know.</p> <p>3 BY MR. KOSOKO:</p> <p>4 Q. Have you ever had a 402 conference</p> <p>5 and the judge and the State's Attorney walked</p> <p>6 out and found you not guilty?</p> <p>7 A. No. I don't -- no.</p> <p>8 Q. Okay. A 402 conference is to try to</p> <p>9 figure out what sentence you would get, correct,</p> <p>10 if you plead guilty?</p> <p>11 MR. FLAXMAN: Objection, foundation.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I guess -- I guess so.</p> <p>14 BY MR. KOSOKO:</p> <p>15 Q. Okay. Let's talk about that May 31,</p> <p>16 2005 date. I'm going to share what we marked</p> <p>17 as -- what we'll mark -- we're going to mark</p> <p>18 this as Watts Exhibit Number 2.</p> <p>19 (WHEREUPON, Watts Exhibit No. 2 was</p> <p>20 presented to the witness.)</p> <p>21 BY MR. KOSOKO:</p> <p>22 Q. Mr. Blair, do you see this?</p> <p>23 A. Yeah.</p> <p>24 Q. Do you recall this exchange between</p>
Page 239	<p>1 building was up -- you got to understand, the</p> <p>2 buildings are up, man. I mean, if you are -- if</p> <p>3 you're an officer, there's no way you could tell</p> <p>4 me that you could see -- from outside looking in</p> <p>5 the building that you could see somebody make</p> <p>6 three transactions. It's no way.</p> <p>7 Q. Okay. Mr. -- Mr. Blair, prior to the</p> <p>8 beginning of your motion to suppress hearing,</p> <p>9 did the State ask for a 402 or did you ask for a</p> <p>10 402?</p> <p>11 A. I did.</p> <p>12 Q. Okay. Mr. Blair, what is the purpose</p> <p>13 of a 402 conference?</p> <p>14 A. To see if we can -- I mean, it's to</p> <p>15 see if -- what kind of time I'm looking at, I</p> <p>16 think.</p> <p>17 I'm not -- I'm not -- I can't give</p> <p>18 you a definitive answer of a 402 conference. I</p> <p>19 just know it's, like, we talk to the judge</p> <p>20 about --</p> <p>21 Q. Well, a 402 conference isn't a</p> <p>22 conference that leads to a not guilty, correct?</p> <p>23 MR. FLAXMAN: Objection, foundation.</p> <p>24</p>	Page 241	<p>1 Judge Laws and your attorney, Mr. Labrador?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Okay. I'll read it for the record,</p> <p>4 Mr. Blair.</p> <p>5 Your attorney says this in open</p> <p>6 court:</p> <p>7 [As read] "Your Honor, Richard</p> <p>8 Labrador on behalf of Harvey</p> <p>9 Blair. At this time, Mr. Blair</p> <p>10 will be asking for a 402</p> <p>11 conference."</p> <p>12 A. Mm-hm.</p> <p>13 Q. Judge Laws, in response:</p> <p>14 [As read] "Mr. Blair, in a 402</p> <p>15 conference, I meet with your</p> <p>16 attorney as well as the</p> <p>17 State's Attorney. I will hear</p> <p>18 about the facts and circumstances</p> <p>19 concerning your case. Normally,</p> <p>20 I would not hear about those</p> <p>21 facts until you actually have a</p> <p>22 trial.</p> <p>23 "I will hear about your background,</p> <p>24 criminal, if you have any, and</p>

64 (Pages 238 to 241)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 242	<p>1 personal.</p> <p>2 "With that information, I will make a</p> <p>3 recommendation as to what I feel</p> <p>4 is the appropriate sentence in</p> <p>5 this case. If you are not happy</p> <p>6 with my recommendation, you don't</p> <p>7 have to accept my offer. You are</p> <p>8 still entitled to have a trial.</p> <p>9 However, that is not a reason to</p> <p>10 ask for another judge.</p> <p>11 "Do you understand that?"</p> <p>12 Do you recall that exchange between</p> <p>13 your attorney and Judge Laws?</p> <p>14 A. Yes.</p> <p>15 Q. And she asked you a question,</p> <p>16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And what was your response to</p> <p>19 her question about whether you understood what a</p> <p>20 402 conference was?</p> <p>21 A. And I said yes.</p> <p>22 Q. Okay. And then they proceeded to</p> <p>23 have a 402 conference, correct?</p> <p>24 A. Yes.</p>	Page 244	<p>1 conference?</p> <p>2 A. We talked about three years.</p> <p>3 Q. Okay. And, in fact, Mr. Blair, the</p> <p>4 reason you couldn't get the disposition you</p> <p>5 wanted was because you were saying no to HRDI,</p> <p>6 correct?</p> <p>7 A. No, that's not correct.</p> <p>8 Q. You didn't want to be incarcerated at</p> <p>9 all for this, correct?</p> <p>10 A. No.</p> <p>11 Q. Do you know what HR -- do you</p> <p>12 remember what HRDI is?</p> <p>13 A. Yeah, I know what it is.</p> <p>14 Q. Okay. Tell everybody else --</p> <p>15 A. Treatment --</p> <p>16 Q. -- what's HRDI?</p> <p>17 A. It's treatment.</p> <p>18 Q. It's in-custody treatment, correct?</p> <p>19 A. That's correct.</p> <p>20 Q. Okay. What's the difference between</p> <p>21 HRDI and TASC?</p> <p>22 MR. FLAXMAN: Objection, foundation.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I don't know the difference. I --</p>
Page 243	<p>1 Q. Okay. And you weren't present for</p> <p>2 that, right?</p> <p>3 A. No.</p> <p>4 Q. Okay. What did Mr. Labrador relay to</p> <p>5 you --</p> <p>6 MR. FLAXMAN: Could you put the Bates</p> <p>7 number --</p> <p>8 MR. KOSOKO: I apologize, Joel, yeah. It</p> <p>9 is -- the Bates will be DO JOINT 20114.</p> <p>10 BY MR. KOSOKO:</p> <p>11 Q. After the 402 conference was over --</p> <p>12 this was immediately before your motion to</p> <p>13 suppress hearing, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. So you asked to find out how</p> <p>16 to resolve the case before the motion to</p> <p>17 suppress hearing, correct?</p> <p>18 A. Yes.</p> <p>19 Q. You were trying to cop out to the</p> <p>20 charges before your motion to suppress hearing,</p> <p>21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. What happened -- what did you and</p> <p>24 Mr. Labrador talk about after the 402</p>	Page 245	<p>1 they both are treatment -- it's both -- both of</p> <p>2 them are treatment. Some -- it has to do with</p> <p>3 some form of treatment, both of them.</p> <p>4 BY MR. KOSOKO:</p> <p>5 Q. Okay. Earlier, Mr. Palles asked you</p> <p>6 did you talk to Mr. Labrador and state that what</p> <p>7 you needed in this case was that you needed</p> <p>8 help; isn't that correct?</p> <p>9 MR. FLAXMAN: Objection, foundation.</p> <p>10 Objection, asked and answered, form.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I don't recall -- I don't know. I</p> <p>13 don't know.</p> <p>14 BY MR. KOSOKO:</p> <p>15 Q. Okay. Who test- -- which officer</p> <p>16 testified at your motion to suppress?</p> <p>17 MR. FLAXMAN: Objection, asked and</p> <p>18 answered.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I guess it was Officer Jones, I</p> <p>21 think.</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q. Okay. Was it in -- isn't it true</p> <p>24 that it was actually Officer Young who</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 246	<p>1 testified?</p> <p>2 A. I --</p> <p>3 MR. FLAXMAN: Objection, form, foundation,</p> <p>4 asked and answered.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I don't -- I don't remember which one</p> <p>7 it was, but -- because I think both of them came</p> <p>8 to court. So they just --</p> <p>9 BY MR. KOSOKO:</p> <p>10 Q. Okay. Can you describe Officer Young</p> <p>11 for me, please? What did he look like?</p> <p>12 A. I just know they was -- both of them</p> <p>13 were Black officers. I don't remember their</p> <p>14 height and weight, skin tone. I just</p> <p>15 know both -- I just knew both of them being</p> <p>16 Black officers.</p> <p>17 Q. What about hairstyle?</p> <p>18 A. I don't even remember that.</p> <p>19 Q. All right. So you don't remember</p> <p>20 Officer Young and Officer Jones looking like,</p> <p>21 essentially, twins?</p> <p>22 A. No.</p> <p>23 Q. Okay.</p> <p>24 A. But they -- they probably did look</p>	Page 248	<p>1 Q. And it was recalled to begin your</p> <p>2 motion to quash, correct?</p> <p>3 A. Mm-hm.</p> <p>4 Q. And that's because you could not</p> <p>5 reach a deal that you wanted to take from the</p> <p>6 State, correct?</p> <p>7 A. That's correct.</p> <p>8 Q. So it's at that point that you wanted</p> <p>9 to fight the case, right?</p> <p>10 A. At that point I what?</p> <p>11 Q. You wanted to fight the case because</p> <p>12 you --</p> <p>13 A. Yes.</p> <p>14 Q. -- didn't get a good deal, right?</p> <p>15 A. Right. Yes.</p> <p>16 Q. I'm sorry, Mr. Blair. I'm going to</p> <p>17 try to speed it up, all right, Mr. Blair?</p> <p>18 You've been here for a long time. You've been a</p> <p>19 good sport.</p> <p>20 Do you recall this testimony</p> <p>21 between -- between your counsel and Officer</p> <p>22 Kenneth Young, Jr.?</p> <p>23 A. Yes.</p> <p>24 Q. At that time, were you working alone</p>
Page 247	<p>1 alike. I don't know. I don't remember.</p> <p>2 Q. Okay. Do you recall this testimony</p> <p>3 from Officer Kenny Young? And I'll screen-share</p> <p>4 this. It's just a continuation of the prior</p> <p>5 exhibit, so this would still be Watts Exhibit</p> <p>6 Number 2. Just -- it's the rest of that</p> <p>7 transcript.</p> <p>8 Do you recall Officer -- do you see</p> <p>9 this transcript, Mr. --</p> <p>10 A. Yes --</p> <p>11 Q. Okay.</p> <p>12 A. -- I see it.</p> <p>13 Q. I'm going to -- just -- just -- just</p> <p>14 to -- just to show you, I'm not -- I'm just</p> <p>15 scrolling through.</p> <p>16 Do you see the testimony regarding</p> <p>17 your 402 conference right there?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Do you see that the very</p> <p>20 next -- that the case was passed for the 402?</p> <p>21 A. Yes.</p> <p>22 Q. And you see that the case is</p> <p>23 recalled, correct?</p> <p>24 A. Yes.</p>	Page 249	<p>1 or with a partner?</p> <p>2 He says: With a partner.</p> <p>3 Do you recall that -- him being --</p> <p>4 saying he was with a partner?</p> <p>5 A. Yes.</p> <p>6 Q. Do you recall that he goes -- did he</p> <p>7 name the officers that were with him that day?</p> <p>8 A. Not all the officers.</p> <p>9 Q. Okay. And he said: Who were your</p> <p>10 partners that day?</p> <p>11 And he said: Alvin Jones.</p> <p>12 Correct?</p> <p>13 A. Yes.</p> <p>14 Q. And you [sic] said: Were you working</p> <p>15 with other officers?</p> <p>16 And what was his answer? He said</p> <p>17 yes, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And he said: Who were those</p> <p>20 officers?</p> <p>21 Correct?</p> <p>22 A. Yes.</p> <p>23 Q. Let me ask you, were you working with</p> <p>24 Officers Ridgell and Mohammed?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 250

1 And he answered: Yes.
2 Correct?
3 A. Yes.
4 **Q. Okay. Do you see -- do you recall at**
5 **any point during this hearing the words "Ronald"**
6 **and "Watts" being mentioned?**
7 A. No.
8 **Q. Did you whisper to Mr. Labrador that:**
9 **You've got to ask about Sergeant Watts?**
10 MR. FLAXMAN: I didn't -- I didn't hear
11 your question. I think you --
12 BY MR. KOSOKO:
13 **Q. Did you whisper to Mr. Labrador that**
14 **he should ask about Sergeant Watts?**
15 A. No, I didn't. But Sergeant Watts was
16 there.
17 **Q. Okay. Mr. Blair, other than that**
18 **moment where you're saying Sergeant Watts claims**
19 **that drugs two to three feet away from you were**
20 **yours, what other time has Sergeant Watts stated**
21 **that you violated the Controlled Substances Act?**
22 A. What are you -- do you mean what,
23 that --
24 **Q. Let's talk about this case, right?**

Page 251

1 A. Right --
2 **Q. You said Sergeant Watts said a bundle**
3 **of drugs found two, three feet away from you**
4 **were yours, correct?**
5 A. Right.
6 **Q. Okay. So it's your allegation that**
7 **that led to this lie about three transactions;**
8 **is that correct?**
9 A. Yes.
10 **Q. Okay. Other than him saying that,**
11 **did Sergeant Watts file any police reports**
12 **against you?**
13 MR. FLAXMAN: Objection, foundation.
14 BY THE WITNESS:
15 A. Not that -- I don't know.
16 BY MR. KOSOKO:
17 **Q. Okay. Did Sergeant Watts testify**
18 **that he saw you in constructive possession of**
19 **narcotics?**
20 A. No, not that I know of.
21 **Q. Okay. Are there any reports that --**
22 **of Sergeant Watts saying he found drugs on you?**
23 MR. FLAXMAN: I didn't hear. Are there
24 any reports --

Page 252

1 BY MR. KOSOKO:
2 **Q. Reports where it states that Sergeant**
3 **Watts found drugs on you.**
4 MR. FLAXMAN: Objection, foundation.
5 BY THE WITNESS:
6 A. I don't know if it's any. I know he
7 signed the reports, though.
8 BY MR. KOSOKO:
9 **Q. You said he said he signed the**
10 **reports?**
11 A. Yeah. He said the --
12 **Q. Okay. Are familiar --**
13 A. -- arrest reports, yeah.
14 **Q. Okay. Are you familiar with the**
15 **Chicago Police Department General Orders?**
16 A. No, I'm not.
17 **Q. Are you familiar with any of the**
18 **Chicago Police Department Special Orders?**
19 A. No, I'm not.
20 **Q. Okay. Because -- that's because**
21 **you're not a police officer, correct?**
22 A. That's correct.
23 **Q. So you don't know what Sergeant**
24 **Watts' signature means on any of those reports,**

Page 253

1 **correct?**
2 MR. FLAXMAN: I'm going to object to
3 this --
4 BY THE WITNESS:
5 A. I --
6 MR. FLAXMAN: Hold on. Hold on.
7 You're arguing with the witness.
8 He's already answered the question. You made
9 your point.
10 BY MR. KOSOKO:
11 **Q. You've got to answer me anyways,**
12 **Mr. Blair. Your attorney's very good, though,**
13 **but you still got to answer.**
14 A. I mean, I don't know, you know, the
15 order of -- the order of the police or how
16 their -- what they sign off on or whatever.
17 But I do know this: At the time of
18 the arrest, Mohammed and Sergeant Watts were
19 there --
20 **Q. Okay.**
21 A. -- at the time of the arrest were
22 there.
23 **Q. Okay.**
24 A. Okay.

67 (Pages 250 to 253)

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 254	<p>1 MR. FLAXMAN: Let him get back to his</p> <p>2 question. We're not answering questions he</p> <p>3 didn't ask.</p> <p>4 BY MR. KOSOKO:</p> <p>5 Q. Mr. Blair, Sergeant Watts didn't do</p> <p>6 anything to make you go to prison, correct?</p> <p>7 MR. FLAXMAN: Objection, asked and</p> <p>8 answered, foundation, argumentative.</p> <p>9 BY THE WITNESS:</p> <p>10 A. Yeah. Yes, he did.</p> <p>11 THE VIDEOGRAPHER: Okay. Mr. Blair, we</p> <p>12 need you to sit up, please.</p> <p>13 THE WITNESS: I'm sorry.</p> <p>14 MR. FLAXMAN: Yeah, sit up. Move your --</p> <p>15 THE WITNESS: Yes.</p> <p>16 THE VIDEOGRAPHER: Thank you.</p> <p>17 BY MR. KOSOKO:</p> <p>18 Q. Okay. How did Sergeant Watts</p> <p>19 contribute to your criminal prosecution?</p> <p>20 A. By stating that the drugs he -- that</p> <p>21 the drugs he found on the floor was mine.</p> <p>22 Q. Okay. That's not the evidence</p> <p>23 against you, though, in court, correct?</p> <p>24 A. Yes, it is.</p>	Page 256	<p>1 You sat through your motion to</p> <p>2 suppress, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And, essentially, your motion</p> <p>5 to suppress -- this is a -- this is -- you were</p> <p>6 charged with possessing something you shouldn't</p> <p>7 have possessed, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. So the officers that testified</p> <p>10 against you said they saw you and found drugs in</p> <p>11 your possession, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. Do you recall Kenneth Young</p> <p>14 being asked this question and him giving this</p> <p>15 response? Were you in open court for this?</p> <p>16 [As read] "Now, when you say he was</p> <p>17 standing in a doorway, can you</p> <p>18 describe the doorway?</p> <p>19 "The front of the building that the</p> <p>20 canopy -- there's steps where you</p> <p>21 can walk up to enter the</p> <p>22 building and the door is wide</p> <p>23 open right in the front."</p> <p>24 Do you recall that testimony?</p>
Page 255	<p>1 Q. Okay. When has Sergeant Watts ever</p> <p>2 stated that you were in constructive possession</p> <p>3 of narcotic?</p> <p>4 A. At the -- at the time that they were</p> <p>5 arresting me.</p> <p>6 Q. Okay. That's not the evidence that</p> <p>7 led to you going to prison, correct?</p> <p>8 MR. FLAXMAN: Objection, foundation.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I don't know. I don't -- it has to</p> <p>11 be. What did I go to prison for?</p> <p>12 BY MR. KOSOKO:</p> <p>13 Q. You went to prison because Kenneth</p> <p>14 Young and Alvin Jones said they saw you selling</p> <p>15 drugs and they chased you up the stairs and</p> <p>16 caught you with drugs.</p> <p>17 Isn't that what you went to prison</p> <p>18 for?</p> <p>19 MR. FLAXMAN: Objection, foundation, form.</p> <p>20 BY THE WITNESS:</p> <p>21 A. No.</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q. Okay. I'm going to go back to Watts</p> <p>24 Exhibit Number 2.</p>	Page 257	<p>1 A. No, I don't, but if he -- that's what</p> <p>2 he said, yeah.</p> <p>3 Q. Mr. -- Mr. Blair, what do you</p> <p>4 remember -- like, you remember the day of your</p> <p>5 arrest vividly, correct?</p> <p>6 A. Yeah.</p> <p>7 Q. And that's because -- that's because</p> <p>8 it's a very important moment in your life,</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. Even though you had been arrested for</p> <p>12 drugs a bunch of times, this stands out because</p> <p>13 you claim you weren't actually selling drugs</p> <p>14 today, right?</p> <p>15 A. Yes.</p> <p>16 Q. And that's why it stands out over any</p> <p>17 of the other arrests, right?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. But do you remember the</p> <p>20 proceedings that led to your false</p> <p>21 incarceration?</p> <p>22 A. Do I remember the events that led to</p> <p>23 my false incarceration --</p> <p>24 Q. The actual criminal proceedings. The</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 258	Page 260
<p>1 criminal proceedings, that's what -- actually</p> <p>2 what put you in prison, right?</p> <p>3 A. Yeah, but I don't --</p> <p>4 Q. Because you've been arrested before,</p> <p>5 right?</p> <p>6 A. Yeah, I've been arrested before.</p> <p>7 Q. And you beat cases before, right?</p> <p>8 A. Yes, I have.</p> <p>9 Q. So you don't -- just because you get</p> <p>10 arrested doesn't mean you go to CCDOC for months</p> <p>11 at a time, right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay --</p> <p>14 A. You can.</p> <p>15 Q. -- before, right?</p> <p>16 A. Pardon me?</p> <p>17 Q. You testified earlier you won a case</p> <p>18 before during the prelim, right?</p> <p>19 A. Yeah, I've -- I have.</p> <p>20 Q. Okay. So you weren't in prison for</p> <p>21 months for that, right?</p> <p>22 A. No, no, I wasn't --</p> <p>23 Q. Okay. You certainly didn't -- you</p> <p>24 certainly didn't go to IDOC after that, right?</p>	<p>1 correct?</p> <p>2 A. Okay. Hold on. Hold on. Okay. If</p> <p>3 he saw me engaging in three hand-to-hand --</p> <p>4 Q. Mr. Blair --</p> <p>5 A. -- transactions --</p> <p>6 Q. Mr. Blair --</p> <p>7 A. Listen. Listen.</p> <p>8 MR. FLAXMAN: No. No. No. Harvey,</p> <p>9 Harvey --</p> <p>10 BY MR. KOSOKO:</p> <p>11 Q. You don't want to do this. Trust me,</p> <p>12 you don't do --</p> <p>13 (Unreportable cross-talk.)</p> <p>14 MR. FLAXMAN: With me, we can answer</p> <p>15 different questions.</p> <p>16 BY MR. KOSOKO:</p> <p>17 Q. Yeah. Don't -- don't --</p> <p>18 MR. FLAXMAN: If he's asking you "yes" or</p> <p>19 "no," just tell him "yes" or "no."</p> <p>20 BY MR. KOSOKO:</p> <p>21 Q. Okay. That was the evidence against</p> <p>22 you, right?</p> <p>23 A. Supposedly, yeah.</p> <p>24 Q. Okay. Now, Mr. Blair, I get you're</p>
Page 259	Page 261
<p>1 A. Right.</p> <p>2 Q. So the arrest, in and of itself,</p> <p>3 isn't what leads you to IDOC, correct?</p> <p>4 A. Correct.</p> <p>5 Q. What happens in court matters,</p> <p>6 correct?</p> <p>7 A. Yeah.</p> <p>8 Q. And in these proceedings, Sergeant</p> <p>9 Watts never participated in any court</p> <p>10 proceedings, correct?</p> <p>11 A. I -- yeah, that's correct. But he</p> <p>12 was a part of the arresting team that sent me to</p> <p>13 these court proceedings.</p> <p>14 Q. Okay. Mr. Blair, do you recall</p> <p>15 Officer Jones being asked this question and</p> <p>16 giving this response:</p> <p>17 [As read] "And was he interacting</p> <p>18 with any of these people?</p> <p>19 "ANSWER: He engaged in hand-to-hand</p> <p>20 exchange with three separate</p> <p>21 individuals."</p> <p>22 Do you recall that?</p> <p>23 A. Yes.</p> <p>24 Q. That was the evidence against you,</p>	<p>1 getting -- you're getting frustrated. You're</p> <p>2 saying it's impossible for this to have</p> <p>3 happened, right?</p> <p>4 A. Yeah, I'm saying it's impossible,</p> <p>5 yes.</p> <p>6 Q. Okay. But the officers are saying</p> <p>7 that that's what they saw that day, correct?</p> <p>8 A. Oh -- yeah. Correct.</p> <p>9 MR. FLAXMAN: It's okay.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I want to ask you something now --</p> <p>12 MR. FLAXMAN: No, no, no. Don't ask --</p> <p>13 THE WITNESS: Please, I want to ask him</p> <p>14 something --</p> <p>15 MR. FLAXMAN: No, no.</p> <p>16 THE WITNESS: -- because --</p> <p>17 MR. FLAXMAN: You can talk to me. You</p> <p>18 can't ask questions of any of the lawyers --</p> <p>19 MR. KOSOKO: Hey, hey, Joel, Joel, let's</p> <p>20 take three minutes so you can counsel --</p> <p>21 MR. FLAXMAN: We're going to take a break.</p> <p>22 We're going to take a break.</p> <p>23 THE VIDEOGRAPHER: The time is 3:37. We're</p> <p>24 off the record.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 262	<p>1 (WHEREUPON, a recess was had.)</p> <p>2 THE VIDEOGRAPHER: The time is now</p> <p>3 3:46 p.m. This is the beginning of Media 5.</p> <p>4 Back on the record.</p> <p>5 BY MR. KOSOKO:</p> <p>6 Q. All right. Mr. Blair, I'm going to</p> <p>7 finish up my questions real quick. We're going</p> <p>8 to continue with that exhibit, okay?</p> <p>9 Now, Mr. Blair, have you seen the</p> <p>10 exhibit?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And this is still Officer</p> <p>13 Young's testimony. Do you recall this question</p> <p>14 and this response?</p> <p>15 [As read] "And when you detained</p> <p>16 him, did you recover anything?</p> <p>17 "Yes, I did.</p> <p>18 "What did you recover?</p> <p>19 "A clear plastic bag containing ten</p> <p>20 Ziploc bags containing white</p> <p>21 suspect heroin.</p> <p>22 "And did you recover anything else</p> <p>23 from him?</p> <p>24 "ANSWER: 65 US States [sic]</p>	Page 264	<p>1 Q. In regards to the \$65, Mr. Blair, did</p> <p>2 you get that money back?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. You never said that you only</p> <p>5 had 10 or \$15 on you, right? You took the 65,</p> <p>6 right?</p> <p>7 A. Yeah. Yes.</p> <p>8 Q. You cashed that check, right?</p> <p>9 A. Right. I didn't remember what -- how</p> <p>10 much I had per se, but, yes, I guess so.</p> <p>11 Q. Just so I don't put Ms. West's</p> <p>12 exhibit to waste, I'm going to mark this as</p> <p>13 Watts Number 3.</p> <p>14 (WHEREUPON, Watts Exhibit No. 3 was</p> <p>15 presented to the witness.)</p> <p>16 BY MR. KOSOKO:</p> <p>17 Q. Do you see that, Mr. Blair?</p> <p>18 A. Yes.</p> <p>19 Q. That's the check that the City of</p> <p>20 Chicago sent you, right, for the \$65 that</p> <p>21 Kenneth Young recovered from you, correct?</p> <p>22 MR. FLAXMAN: Objection, foundation.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Yes.</p>
Page 263	<p>1 currency.</p> <p>2 "And did you inventory those items?</p> <p>3 "ANSWER: All those items were</p> <p>4 inventoried."</p> <p>5 Do you recall those questions and</p> <p>6 those responses in your motion to suppress</p> <p>7 hearing?</p> <p>8 A. (Inaudible.)</p> <p>9 (Reporter clarification.)</p> <p>10 BY THE WITNESS:</p> <p>11 A. Yes.</p> <p>12 BY MR. KOSOKO:</p> <p>13 Q. So that's Officer Young stating that</p> <p>14 after he detained you, he found, you know, some</p> <p>15 heroin and 65 bucks in cash, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Mr. Labrador never challenged him</p> <p>18 that: Isn't it true that Sergeant Watts</p> <p>19 actually found those drugs on the ground,</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. That never came up during this</p> <p>23 hearing, correct?</p> <p>24 A. Correct.</p>	Page 265	<p>1 BY MR. KOSOKO:</p> <p>2 Q. All right. I've got to go through</p> <p>3 just -- just because of the objection. So</p> <p>4 I'll -- I'll try to be quick, though.</p> <p>5 Mr. Blair, you requested that money,</p> <p>6 correct?</p> <p>7 A. No, I didn't.</p> <p>8 Q. How did that money come to your</p> <p>9 presence?</p> <p>10 A. I don't remember how it came in my</p> <p>11 presence, but I guess that was the money</p> <p>12 that they must have took off him -- off me, but</p> <p>13 I didn't remember I had that much.</p> <p>14 Q. Okay. Do you recall -- I'm going to</p> <p>15 mark this as Watts Exhibit Number --</p> <p>16 MR. KOSOKO: Which one am I on now, Madam</p> <p>17 Court Reporter?</p> <p>18 MS. REPORTER: I believe your last one was</p> <p>19 3.</p> <p>20 MR. KOSOKO: 3. So this is 4. 3 was the</p> <p>21 check.</p> <p>22 (WHEREUPON, Watts Exhibit No. 4 was</p> <p>23 presented to the witness.)</p> <p>24</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 266</p> <p>1 BY MR. KOSOKO:</p> <p>2 Q. Mr. -- Mr. Blair, do you see what I'm</p> <p>3 showing you on the screen?</p> <p>4 A. Yes, I do.</p> <p>5 Q. Do you recall -- do you recall ever</p> <p>6 receiving a letter like this?</p> <p>7 A. No, I don't.</p> <p>8 Q. Okay. But you see that that -- your</p> <p>9 name is in the top left-hand corner there?</p> <p>10 A. Yes.</p> <p>11 Q. And that is the address you testified</p> <p>12 to earlier that you still reside to -- to this</p> <p>13 day, correct?</p> <p>14 A. Yes, yes.</p> <p>15 Q. And the amount that's at issue here</p> <p>16 is \$65, correct?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. What does the first sentence</p> <p>19 of this state?</p> <p>20 A. [As read] "On July 10, 2004, the</p> <p>21 amount of \$65 was seized by CPD for violations</p> <p>22 of the Illinois Controlled Substances" --</p> <p>23 Q. Okay.</p> <p>24 A. -- "laws."</p>	<p style="text-align: right;">Page 268</p> <p>1 correct?</p> <p>2 A. That's correct.</p> <p>3 Q. It doesn't state that Sergeant Watts</p> <p>4 found this on you, correct?</p> <p>5 A. No, it doesn't say that.</p> <p>6 Q. And it's the \$65 that you got that</p> <p>7 check for, correct?</p> <p>8 A. Yeah.</p> <p>9 Q. All right, Mr. Blair. So why now?</p> <p>10 Why are you saying Ronald Watts had anything to</p> <p>11 do with this now?</p> <p>12 MR. FLAXMAN: Objection, form.</p> <p>13 BY THE WITNESS:</p> <p>14 A. What you mean, "why now"? I</p> <p>15 didn't --</p> <p>16 BY MR. KOSOKO:</p> <p>17 Q. Well, you were found guilty in 2005,</p> <p>18 correct?</p> <p>19 A. Yes, I was found guilty.</p> <p>20 Q. And you -- and you went to prison for</p> <p>21 a little bit of time for this, right?</p> <p>22 A. Yes.</p> <p>23 Q. And you did -- you did -- you ended</p> <p>24 up -- Judge Laws made you do that HRDI, didn't</p>
<p style="text-align: right;">Page 267</p> <p>1 Q. And that's the same amount from that</p> <p>2 check, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. I'm going to show one more</p> <p>5 document, and then I think I'm going to wrap it</p> <p>6 up.</p> <p>7 A. Okay.</p> <p>8 Q. And this will be Watts Number 5.</p> <p>9 (WHEREUPON, Watts Exhibit No. 5 was</p> <p>10 presented to the witness.)</p> <p>11 BY MR. KOSOKO:</p> <p>12 Q. Mr. Blair, do you recall ever going</p> <p>13 over this document with Mr. Labrador?</p> <p>14 A. Not exactly, no.</p> <p>15 Q. You didn't recover -- you didn't go</p> <p>16 over any inventory reports with him at all?</p> <p>17 A. Not -- no, not that I recall, no.</p> <p>18 Q. All right. Do you see that your name</p> <p>19 is listed on this document?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And that Kenneth Young is listed as</p> <p>22 the "found by" officer?</p> <p>23 A. Yes.</p> <p>24 Q. On the date you were arrested,</p>	<p style="text-align: right;">Page 269</p> <p>1 he?</p> <p>2 A. No, she didn't.</p> <p>3 Q. She did not?</p> <p>4 A. No, she sent me to the IDOC.</p> <p>5 Q. Just one moment.</p> <p>6 Now, as I -- as I look for Judge</p> <p>7 Laws' order, this went on -- you were exonerated</p> <p>8 in what year, Mr. Blair?</p> <p>9 A. 2018 or '19.</p> <p>10 Q. Did you file --</p> <p>11 A. 2018 --</p> <p>12 Q. -- anything to challenge this case at</p> <p>13 all prior to your representation before the</p> <p>14 Flaxman firm?</p> <p>15 A. Not that I recall, no, I didn't.</p> <p>16 Q. Why did you wait so long?</p> <p>17 A. I didn't -- because I didn't --</p> <p>18 actually, I didn't know that I could do that.</p> <p>19 That's what -- that's why I waited so long. I</p> <p>20 didn't know I could do that.</p> <p>21 Q. Now, Mr. Blair, at any point, did</p> <p>22 you -- did you get remanded to HRDI to help with</p> <p>23 your sentence credit?</p> <p>24 A. No.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

<p style="text-align: right;">Page 270</p> <p>1 Q. All right. This will be Watts 2 Number 6. 3 (WHEREUPON, Watts Exhibit No. 6 was 4 presented to the witness.) 5 BY MR. KOSOKO: 6 Q. Mr. -- do you see this? 7 A. Yes. 8 Q. You don't recall that on 9 September 23, 2004, Judge Laws had you admitted 10 to the HRDI program? 11 A. Nope, I didn't -- she had -- she 12 probably sent it, but I don't remember going. I 13 don't -- I didn't go -- I don't know if they had 14 bed space or something like that. I don't 15 think -- I don't remember going. 16 Q. But Judge Laws tried to put you in 17 HRDI -- 18 A. Yeah. 19 Q. -- right? 20 A. Yeah. 21 Q. And let's -- Judge Laws was a solid 22 judge, right? 23 MR. FLAXMAN: Objection, foundation. 24</p>	<p style="text-align: right;">Page 272</p> <p>1 A. Ben is not who I -- who I was talking 2 about. It's -- 3 Q. What Ben were you speaking of? 4 A. I didn't say nobody named Ben. I 5 said Baker. Baker is his last name, but I'm not 6 talking about Ben. 7 Q. Okay. What Baker are you speaking 8 of? 9 A. This -- another -- another guy from 10 the area. 11 Q. Do you recall his first name or a 12 nickname, if you have one? 13 A. We just call him Little Baker, but 14 it's not Ben, you know. I know Ben. 15 Q. And so you never -- 16 A. I don't -- 17 Q. Sorry? 18 A. I don't think Ben was even on the 19 streets when I caught that case -- when I caught 20 this case. 21 Q. So you never worked for Ben Baker? 22 A. No. 23 MS. HARRIS: Okay. No further questions. 24 MR. KOSOKO: Hang on. I've got a</p>
<p style="text-align: right;">Page 271</p> <p>1 BY THE WITNESS: 2 A. She was okay. 3 MR. KOSOKO: You've been a good sport, 4 Mr. Blair. I'm glad you're getting your life 5 together. God bless you. 6 No further questions from our office. 7 THE WITNESS: Thank you. 8 EXAMINATION 9 BY MS. HARRIS: 10 Q. Hi, Mr. Blair. I -- 11 A. Hello. 12 Q. -- represent the City. I have just a 13 few very brief questions for you. 14 A. Okay. 15 Q. Now, you testified earlier that you 16 worked security and pitched for multiple dealers 17 or distributors in the extensions, correct? 18 A. Yes. 19 Q. And one of those distributors was Ben 20 Baker? 21 A. No, I didn't say -- no. I think 22 you're getting him mixed up with somebody -- 23 with a different Baker. Ben was not -- 24 Q. Who was --</p>	<p style="text-align: right;">Page 273</p> <p>1 follow-up. 2 FURTHER EXAMINATION 3 BY MR. KOSOKO: 4 Q. Mr. Blair, you know -- 5 A. Yes. 6 Q. -- you know Ben Baker? 7 A. Yeah, I knew Ben. 8 Q. And you knew that he -- was Ben Baker 9 a drug dealer? 10 A. Yeah. 11 Q. And you have enough knowledge about 12 Ben Baker to know that he might have been in the 13 joint when you picked up this case? 14 A. Yeah. I remember -- I think he was 15 because I remember him having a lot of time. He 16 had, like, about 18 years, but -- 17 Q. All right. 18 A. -- I don't -- I don't know if -- if 19 he -- I don't think he was on the street when I 20 caught this case. That's all I'm -- 21 Q. Mr. Blair, you know, I'm not even 22 going to go through the list because there's 23 probably 100 people. 24 But -- but -- so...</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 274	<p>1 What about Valentino Wilbourn?</p> <p>2 A. Who?</p> <p>3 Q. Valentino Wilbourn?</p> <p>4 MR. FLAXMAN: Hold on. Hold on --</p> <p>5 BY THE WITNESS:</p> <p>6 A. I don't even know that person.</p> <p>7 MR. FLAXMAN: Hold on. You finished your</p> <p>8 questioning. I'm objecting to further</p> <p>9 questioning.</p> <p>10 MR. KOSOKO: I'm going to --</p> <p>11 MR. PALLES: You can't object to further --</p> <p>12 MR. FLAXMAN: Dhaviella -- Ms. Harris -- I</p> <p>13 apologize.</p> <p>14 Ms. Harris elicited something that</p> <p>15 seems new to the matter.</p> <p>16 MR. PALLES: Not only that, we can go back</p> <p>17 and forth as much as we want, Joel, between --</p> <p>18 MR. FLAXMAN: Under what rules can you go</p> <p>19 back and forth as much as you want?</p> <p>20 MR. PALLES: We have seven hours to depose.</p> <p>21 MR. KOSOKO: Till we use the seven hours.</p> <p>22 MR. FLAXMAN: You don't have seven hours to</p> <p>23 bounce back and forth. You have to proceed as a</p> <p>24 trial.</p>	Page 276	<p>1 A. I have -- I've asked myself that</p> <p>2 question over and over again. I don't know why.</p> <p>3 I think it's because -- I think -- I think they</p> <p>4 had -- I think they had prior knowledge to my</p> <p>5 arrests that I had, you know, before. That's</p> <p>6 what I think, so I think they had prior</p> <p>7 knowledge of older -- older cases that I had.</p> <p>8 Q. And how would they -- do you have any</p> <p>9 idea how they would have obtained that</p> <p>10 knowledge?</p> <p>11 A. I mean, like, if I give them my ID,</p> <p>12 they can run -- they can run my name and see how</p> <p>13 many arrests I had or what I've been in jail</p> <p>14 for.</p> <p>15 Q. And they ran your name the day of</p> <p>16 this arrest?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Had they -- and they hadn't</p> <p>19 run your name at any time prior to this arrest?</p> <p>20 A. I don't -- I don't know.</p> <p>21 Q. Okay. All right. I'm sorry. Let me</p> <p>22 just ask about Ben Baker.</p> <p>23 How did you first --</p> <p>24 A. Okay.</p>
Page 275	<p>1 MR. KOSOKO: Joel, I would love to --</p> <p>2 MR. PALLES: Show me that.</p> <p>3 MR. KOSOKO: Joel, I would love to see case</p> <p>4 law that --</p> <p>5 MR. PALLES: Yeah, I'd like to see case law</p> <p>6 on that, Joel.</p> <p>7 MR. KOSOKO: That we can't re-question</p> <p>8 him after -- that it's like we close our case in</p> <p>9 chief. I would love to see that case law.</p> <p>10 MR. PALLES: Yeah.</p> <p>11 But in the meantime, I have a</p> <p>12 question or two, if you don't mind.</p> <p>13 FURTHER EXAMINATION</p> <p>14 BY MR. PALLES:</p> <p>15 Q. Mr. Blair --</p> <p>16 A. Yes.</p> <p>17 Q. -- were you the only person arrested</p> <p>18 among those seven?</p> <p>19 A. As far as I know, yes, because I --</p> <p>20 well, it wasn't -- wasn't nobody else in the</p> <p>21 squad car with me. I went to the station alone.</p> <p>22 Q. Okay. Do you know why it was that</p> <p>23 the officers picked you out from amongst those</p> <p>24 seven?</p>	Page 277	<p>1 Q. How did you first meet him?</p> <p>2 A. Because he -- he's from the</p> <p>3 neighborhood.</p> <p>4 Q. Okay. Where did he live?</p> <p>5 A. Where do I live?</p> <p>6 Q. Where did he live?</p> <p>7 A. He -- excuse me. He lived at</p> <p>8 527 East Browning, I think.</p> <p>9 Q. What floor?</p> <p>10 A. Oh, I don't know. I don't -- I don't</p> <p>11 know which -- what floor.</p> <p>12 Q. Did you know his wife?</p> <p>13 A. Yeah. I know her but not like I --</p> <p>14 not like we engage in conversation. But, yeah,</p> <p>15 I know of her, yeah.</p> <p>16 Q. Did you know her back in 2004?</p> <p>17 A. I'm quite sure I did, yeah.</p> <p>18 Q. Okay. Did you know Ben to be a</p> <p>19 member of the Gangster Disciples?</p> <p>20 A. No, I don't.</p> <p>21 Q. Did you know Ben to be manager of the</p> <p>22 drug trade in the 527 Building?</p> <p>23 A. I know he was high up on the food</p> <p>24 chain, yeah.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 278	Page 280
<p>1 Q. Okay. All right. And, again, now --</p> <p>2 so you -- do you remember when you first met</p> <p>3 Ben?</p> <p>4 A. I don't -- well, it wasn't like we</p> <p>5 introduced each other -- you know, we was</p> <p>6 introduced. But, yeah, I mean, by him -- by us</p> <p>7 being from the same neighborhood, that's how</p> <p>8 I -- that's how I knew him.</p> <p>9 Q. Did you ever buy any drugs from his</p> <p>10 line?</p> <p>11 A. No -- oh, I take that back. I'm</p> <p>12 sorry. I take that back. I -- yes, I have.</p> <p>13 Q. What kind? What was it, heroin or...</p> <p>14 A. Yes.</p> <p>15 Q. Did you ever -- it seems that you</p> <p>16 didn't do very much crack cocaine. No? You</p> <p>17 don't --</p> <p>18 A. No, I --</p> <p>19 Q. -- you're not a user?</p> <p>20 A. No.</p> <p>21 Q. But you did pitch it every once in</p> <p>22 a while from --</p> <p>23 A. Oh, yeah. I've sold it, yes.</p> <p>24 Q. Okay.</p>	<p>1 deposition. We're off the record.</p> <p>2 (WHEREUPON, the deposition was concluded</p> <p>3 at 4:03 p.m. CST)</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
Page 279	
<p>1 MR. PALLES: All right. That's all the</p> <p>2 questions I have.</p> <p>3 MS. WEST: I have one follow-up based on</p> <p>4 that.</p> <p>5 FURTHER EXAMINATION</p> <p>6 BY MS. WEST:</p> <p>7 Q. Mr. Blair --</p> <p>8 A. Yes.</p> <p>9 Q. -- did you ever sell drugs out of the</p> <p>10 527 Building?</p> <p>11 A. No.</p> <p>12 Q. Did you ever sell drugs for Ben</p> <p>13 Baker?</p> <p>14 A. No.</p> <p>15 Q. Did you ever set foot in Ben Baker's</p> <p>16 apartment in the 527 Building?</p> <p>17 A. No.</p> <p>18 MS. WEST: Okay. That's all I have.</p> <p>19 MR. FLAXMAN: Okay. I don't have any</p> <p>20 questions. We're going to reserve signature.</p> <p>21 MR. PALLES: All right. Thanks, all.</p> <p>22 Thank you, Mr. Blair.</p> <p>23 THE VIDEOGRAPHER: The time is 4:03 p.m.</p> <p>24 This is the end of Media 5. This concludes this</p>	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 281

1 C E R T I F I C A T E O F R E P O R T E R

2

3 I, MICHELLE M. YOHLER, a Certified
4 Shorthand Reporter within and for the County of
5 Cook, State of Illinois, do hereby certify:

6 That previous to the commencement of
7 the examination of the witness, the witness was
8 duly sworn to testify the whole truth concerning
9 the matters herein;

10 That the foregoing deposition
11 transcript was reported stenographically by me,
12 was thereafter reduced to typewriting under my
13 personal direction and constitutes a true record
14 of the testimony given and the proceedings had;

15 That the said deposition was taken
16 before me remotely on the date and time
17 specified;

18 That I am not a relative or employee
19 or attorney or counsel, nor a relative or
20 employee of such attorney or counsel for any of
21 the parties hereto, nor interested directly or
22 indirectly in the outcome of this action.

23

24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 282

1 IN WITNESS WHEREOF, I do hereunto set
2 my hand and affix my seal of office at Chicago,
3 Illinois, this 17th day of November, 2022.

4

5

6



7

8

Michelle M. Yohler, CSR, RMR, CRR

9

Certified Shorthand Reporter

10

CSR No.: 84-4531.

11

12

13

14

15

16

17

18

19

20

21

22

23

24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 283

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

3 In re: WATTS COORDINATED)
4 PRETRIAL PROCEEDINGS) No. 19-cv-01717
5)

6 I hereby certify that I have read the
7 foregoing transcript of my deposition given at
8 the time and place aforesaid and I do again
9 subscribe and make oath that the same is a true,
10 correct and complete transcript of my deposition
11 so given as aforesaid, and includes changes, if
12 any, so made by me.

13
14
15 HARVEY BLAIR
16
17
18

19 SUBSCRIBED AND SWORN TO before me
20 this day of , A.D. 2022.
21
22
23

24 Notary Public

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 284

A				
A.D 283:20	affidavit 4:21	allegation 251:6	answered 198:4	155:14
a.m 1:12 6:8	12:1,3,6 116:7	allegedly 182:13	218:24 221:1	appropriate
50:19	117:2 118:8,13	209:3	225:5 226:15	242:4
Aberdeen 2:3	118:18 119:1	Allen 141:5,6,9	245:10,18	approximately
ability 8:21	129:16	141:21 172:7	246:4 250:1	6:8 10:2 14:19
able 78:12,14	affiliated 23:6	allowed 75:17	253:8 254:8	16:15 17:2
81:9 85:13,21	23:10	75:19	answering 8:6	22:11 26:8
94:13 157:9,14	affiliating 23:16	Allyson 2:11	254:2	28:24 29:13
157:14 232:21	affix 282:2	6:21 7:18	answers 4:19	35:12 44:2
absolutely 48:23	aforsaid 283:8	126:23	111:23	45:19 46:22
abuse 97:9,13	283:11	altercation	Anthony 137:14	59:10,22 63:6
135:4	African-Amer...	100:1,4	137:15	148:15 187:6
Academy 20:20	157:18 169:23	altercations	anxiety 115:3	April 4:19
accept 242:7	Afros 157:10	99:8,11 103:12	anybody 44:17	111:24 134:10
accident 146:24	afternoon 54:13	Alvin 249:11	46:5 82:14	area 15:15 19:1
accompanied	age 153:1	255:14	152:12,13	24:11 27:13
128:16	agent 170:24	amount 53:24	155:6 191:16	35:8 37:3,5
Accountability	174:7	266:15,21	anymore 23:20	38:5,9,24 59:2
119:20	ago 52:20 65:3	267:1	anyway 178:21	60:8 64:9
accurate 119:3	111:11 115:12	anchor 156:21	anyways 253:11	89:10 113:8,9
acquire 33:11	116:4 120:20	AND- 2:5	apartment 19:8	145:18 149:1
33:20 34:2,4	160:4 192:14	Angela 137:5	37:9 136:20,23	149:21 272:10
act 108:18,21	agree 25:9	anger 115:8	137:2 178:17	arguing 253:7
109:16 250:21	agreement	Angie 136:13,15	178:17 179:10	argumentative
action 199:16	162:24	136:17,19,21	181:13 183:5	254:8
281:22	ahead 20:15	136:24 137:16	185:10 279:16	arm 81:14,16
actual 36:19	41:24 51:19,20	137:21 138:4	apartments	85:23 197:1,7
101:4 127:21	51:20 54:19	138:14	39:12 69:22	198:9 199:17
257:24	72:23 74:24	Angie's 137:3	apologize	199:18 200:12
addict 132:1	82:19 95:22	angry 112:20	146:24 164:12	200:23
addiction 34:8	108:9 109:9	113:1,2	164:16 166:20	arraigned 222:4
135:19 163:19	114:9,20	answer 14:6	243:8 274:13	228:18
164:2	126:14 188:15	31:5 37:18	APPEARAN...	arrest 11:2,17
addition 133:4	189:19 221:13	48:16 109:9	2:1 3:1	29:9 89:6,19
additional 12:17	Ahmed 2:16 7:8	112:19 114:9	Appeared 2:9	92:24 96:9,11
42:12 87:3	156:19	118:15 133:14	2:14,18,23 3:5	99:6 100:10,14
address 18:10	ain't 79:12,14	135:10 139:16	3:9	100:18 103:3
18:19,21 19:6	79:15 84:5,7	139:17 186:21	appearing 1:11	103:17,21
19:14,19,23	163:2 180:5,6	198:5 215:6	85:3	105:18 106:8
20:7 38:14	188:1,4 207:1	219:12,17	appointed 90:17	107:9,13,24
158:12 167:13	207:3 208:15	220:6 239:18	176:24 212:24	110:14,17
167:18 266:11	alcohol 8:20	249:16 253:11	221:7 222:3	111:8 113:23
admitted 270:9	32:9	253:13 259:19	appointment	114:6,15
	alert 173:8,8	260:14 262:24	159:6,8	119:10,24
	alike 247:1	263:3	appreciate	120:4,8 126:3

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 285

128:8 133:11	arrive 62:14	12:10 91:1,11	39:23 40:15,19	background
134:10 135:1,3	arrived 57:4,22	91:15,24	41:3,7 42:18	113:10 136:8
135:6 136:12	57:23 58:12,23	118:16 135:17	44:23 49:7,7	241:23
138:15 145:20	59:9 60:20	136:11 138:12	169:22,22	backside 144:20
147:7 160:17	62:17 65:4,6	139:14 140:3	172:1	bad 197:7,9,10
160:19 176:10	65:19 66:6	140:12 213:21	B-Lo's 169:18	bag 31:23
176:11,18	86:14	213:22 217:24	170:6	262:19
177:9,11	Art 150:11,12	226:6 233:10	back 17:7,9	bags 31:22
183:15 188:7	Art's 150:24	240:5 241:1,5	25:20 26:17	41:18,19 42:5
189:8,11	Arthur 150:21	241:16,17	27:2 28:7,9	42:8,16 180:24
192:17 193:3	150:21 151:4	242:13 281:19	33:22 44:22	181:2 183:13
193:17,24	asked 33:18	281:20	50:20 54:24	262:20
214:8 218:10	73:19,21 75:23	attorney's	55:1,3 61:2,14	Bair 185:21
252:13 253:18	76:1 87:24	119:23 253:12	67:11 73:1,5	Baker 43:14,18
253:21 257:5	91:17 103:23	attorneys 7:22	74:14 76:19	43:20,24 44:3
259:2 276:16	116:16 162:20	126:8	78:1,2 81:10	44:7,14 47:6
276:19	198:3 205:19	attributed	82:17,21,23	62:8,10 120:17
arrested 54:7,11	218:23 219:7	202:13 220:20	85:24,24	120:20,21,22
54:15 59:17	219:15 220:24	223:7	101:15 109:4,7	120:23 121:4
91:13 105:6,8	225:5 226:15	authorities	110:10 112:11	150:7,8 172:3
105:11,13,16	242:15 243:15	133:6	123:8 131:10	271:20,23
106:1 107:5,7	245:5,10,17	authority 133:8	132:6 133:21	272:5,5,7,13
107:16,17	246:4 254:7	Avenue 2:7	136:7 138:12	272:21 273:6,8
108:6 111:5	256:14 259:15	awarded 104:5	140:17,19	273:12 276:22
115:9 134:2	276:1	104:9,13,16	144:18,19	279:13
135:16 138:17	asking 31:6	aware 64:13	145:14,16,23	Baker's 43:15
139:11,22	73:13,14,15	116:6,9 121:7	146:1,3,7	170:10 279:15
140:21 161:2	117:5 135:1	151:1	148:10 156:14	barber 24:21
174:10,12,14	138:19 191:14	awest@halem...	161:5 162:9	156:24 159:18
175:4 176:2,3	191:16,19	2:13	166:20 167:8	160:20 166:4,5
176:4 177:3	213:10 241:10		167:12 173:19	166:9,13,15,17
189:6 190:22	260:18	B	185:12 189:23	166:24 167:17
192:4,10,16	ass 49:22 180:5	B 4:15 5:1 20:9	198:21 199:12	167:19
193:6 233:8,12	assistance 30:10	34:23 35:2	199:14,15	barber's 157:2
233:13,14	53:15	36:17,24 37:8	200:14 204:1	158:14
257:11 258:4,6	assistant 20:14	38:16,19 39:12	208:11 211:1,2	barbershop
258:10 267:24	21:15	43:1 48:14,21	212:14,14	25:7,8 26:3,4,7
275:17	associated 24:5	89:24 120:12	221:11,13	160:16,22
arresting 192:21	assume 191:16	121:11 131:14	234:16 235:2	161:7,17,19
255:5 259:12	attempted 231:1	144:11 149:15	235:12,12,14	BARONI 3:6
arrests 109:24	attend 20:23	149:21 150:4	254:1 255:23	Barrel 26:15
121:10 128:2	21:9 51:22	178:5,16 179:6	262:4 264:2	Barry 20:4,4
132:10,11,17	52:1	B-Lo 32:24 34:5	274:16,19,23	based 279:3
257:17 276:5	attention 61:8	36:7,8,11,13	277:16 278:11	basement
276:13	attorney 9:19	39:5,7,18,22	278:12	158:17 161:1

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 286

basic 164:2	279:12,15	50:10,22 53:13	182:6,17,21,22	Brooklyn
basically 56:15	bench 210:20	54:6 85:2	182:24 183:3,6	110:19,19
98:5 113:13	bend 210:3	101:5,17 104:5	183:12,18,21	brothers 19:15
124:2 200:15	Bending 198:9	104:23 115:19	bogus 238:11	19:17
basing 238:3	benefit 98:11,15	116:20 117:3	Bolton 192:21	brought 7:20
basis 35:22	bent 85:23	117:14 125:19	bond 216:20,22	69:13,15 86:18
122:12 123:11	196:19,21	126:6,17	216:23 217:4,4	86:18,18
Bates 143:13	197:2,8,13	142:23 144:9	217:20,24	199:12,13,14
243:6,9	211:1,2	156:17,23	218:3,21	201:8,9 223:23
bathroom 99:21	best 8:12 231:4	164:13 181:9	221:15,21	225:2 234:22
179:1 180:14	better 127:4	185:21,22	222:1	Browning 39:16
182:1,14,17	145:9	195:1 197:5	boot 106:14	277:8
beat 94:13	big 32:24 33:9	200:2 202:22	boot-camp	bucks 42:14
177:11,12,14	33:12,15,20	205:24 215:10	106:13	60:15 263:15
177:14,15,18	34:2 36:2,5,13	215:16 220:7	booth 162:24	buddies 55:4,5
234:4,7 236:12	36:16,23 37:10	221:12 223:3	booths 25:10	55:11 59:14
258:7	37:14,16,21	223:16 224:13	born 15:11,12	buddy 180:11
bed 270:14	38:7,9,16 39:1	225:1 228:8	16:12,13	180:18,18
beer 59:13	39:17 41:6	233:1 236:18	bottom 112:9	buds 127:11
beginning 50:19	45:6,8 151:22	238:14 239:7	117:23	building 11:17
101:14 156:13	151:23 169:10	239:12 240:22	bought 62:3	36:17,24 37:3
239:8 262:3	171:10,13,21	241:4,9,9,14	104:21	39:13 41:1
behalf 2:9,14,18	bigger 235:5,7	244:3 248:16	Boulevard 2:12	42:19,22 43:1
2:23 3:5,9 6:21	binoculars	248:17 250:17	bounce 274:23	43:8,11 44:2,8
6:23 7:1,8	188:6	253:12 254:5	Box 153:21	44:18 45:14,17
241:8	birds 129:10	254:11 257:3	Boyle 216:6	45:19,23 46:6
belief 183:17	birth 12:24	259:14 260:4,6	228:19	46:16,21 47:2
206:4	bit 109:13 153:2	260:24 262:6,9	break 8:5,7	47:4,6 48:12
believe 11:21	162:11 171:5	264:1,17 265:5	50:11 101:6	48:13 49:5,11
18:1 98:18	268:21	266:2 267:12	155:23 156:2	49:13 54:8
102:5 116:17	bits 186:11	268:9 269:8,21	261:21,22	56:5 57:1,4,7
128:20 129:22	Black 64:5,8,15	271:4,10 273:4	Brian 152:16	57:10,12,18,24
131:1 145:23	64:23 65:1	273:21 275:15	169:14,17,18	58:2,13,23
147:21 187:9	157:15 212:1,8	279:7,22	169:24 170:1	59:9 60:6,8,19
211:5 237:13	212:9,9,10,13	283:15	192:21	60:23 61:1,5
238:15 265:18	229:3 246:13	Blair's 4:18	brief 271:13	61:16,22 62:4
believed 237:17	246:16	111:23	bring 156:20	62:20 65:11,15
bell 2:15 159:10	Blair 1:7 4:4,21	bless 271:5	234:11	65:18 66:5,9
159:10	6:3 7:11,17	Bob 151:21,21	bringing 200:7	66:23 67:1,2,5
Ben 271:19,23	8:16 9:15	151:22,23	201:12	67:10 68:6,19
272:1,3,4,6,14	12:22,23 13:3	Body 44:19	bro 186:20	69:1,2,4,7,18
272:14,18,21	13:14 14:13	46:18 58:6,17	broke 81:14	69:21,24 70:6
273:6,7,8,12	15:5 18:8	179:2 180:12	85:17 197:11	71:6,18,21
276:22 277:18	22:17 23:12,21	180:18,23	broken 81:16	80:12 82:1,4
277:21 278:3	24:15 30:7,16	181:2,5,5	85:13	83:5 87:1,14

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 287

90:6 139:23	278:9	113:8,22	106:17	Chicago 2:3,7
140:10,10,17		130:19 135:14	Center 110:20	2:12,17,21 3:3
140:23 141:17	C	136:8 139:22	centered 23:22	3:5,8 6:12
141:19 144:10	C 281:1,1	154:15,18	certain 48:11	13:17 17:10,12
144:14 147:24	Cadman 3:10	161:3 213:7	140:13	18:11 26:17
165:14 176:12	7:7	215:22 216:2	certainly 258:23	28:3,24 29:2
176:14 178:20	California	221:7 223:14	258:24	109:5,7 121:8
179:8 184:15	149:12	227:11 228:1	certificate 21:2	149:7 196:24
199:13,13,14	call 25:10 41:15	229:21 230:17	21:5,7	252:15,18
199:15 200:8	50:1 106:5	233:17 234:4,7	certificates	264:20 282:2
200:17 201:4	165:5,5,22	234:19,22	22:14	Chicagoland
201:10,21	272:13	235:14 237:3,6	Certified 1:9	15:15 19:1
214:19,20	called 1:8 7:12	241:19 242:5	281:3 282:9	27:13
222:20,20,22	21:11 51:7	243:16 245:7	certify 281:5	chief 275:9
222:23 224:6	99:20 232:3	247:20,22	283:6	child 18:2,6
224:11,12	234:19,22	248:9,11	chain 277:24	30:15
225:17,19,23	235:14	250:24 258:17	chained 210:18	children 14:21
226:4,7 238:7	Calumet 160:9	269:12 272:19	210:20	14:24 15:2
238:10,16,18	160:13	272:20 273:13	chair 158:14	16:4,10,22
238:20,24	Calvin 125:20	273:20 275:3,5	162:5	17:13 18:6
239:1,5 256:19	camaraderie	275:8,9	challenge	30:11 53:15,20
256:22 277:22	47:24	cases 97:12	269:12	choice 41:15
279:10,16	camp 106:14	177:11,12,13	challenged	Chris 154:4,5
buildings 37:9	cane 148:19	177:17 258:7	263:17	Christian 122:1
43:4 45:20	canopy 256:20	276:7	chance 60:4	122:2,11
46:23 47:10	capacity 21:13	cash 33:17 41:6	changes 283:11	123:13,14,20
48:21 50:3	41:2 44:8	41:9,11 42:9	charge 157:23	124:1 154:7
148:24 239:2	46:10	42:12 47:8	157:24 158:1,6	Christian's
bunch 142:5	car 74:4 83:7,19	60:10 72:3	158:7 162:6,7	122:1
184:21 187:1	104:22 173:3	77:1 263:15	162:10 167:9	chronologically
190:1 257:12	275:21	cashed 264:8	175:5 177:4	190:21
bundle 182:24	cards 99:17	Castle 28:20,22	charged 87:17	chunk 36:2
183:3 203:7	care 23:19 35:24	catch 67:9	87:20 88:1,16	Cicero 22:2
251:2	164:1	caught 113:4	88:23 167:10	cigarettes 59:13
BURNS 3:2	Career 20:20	165:7 174:16	167:10,11	circumstances
business 124:7,8	21:11	175:11 176:5,7	256:6	176:10 178:13
125:15,16,17	carried 130:20	176:15 255:16	charges 110:8	231:22 241:18
125:17	229:21 230:18	272:19,19	110:10 233:24	citizens 80:8,11
bust 178:23	cars 62:19 63:5	273:20	236:12 243:20	83:19
181:15	case 1:3 6:5	cause 214:7	charging 162:5	city 3:5 7:2
busted 178:24	11:23 32:10	caused 197:13	chased 255:15	13:17 108:15
178:24	90:18 91:6,18	CCDOC 258:10	cheat 99:18	121:1,8 132:8
busy 158:23	94:10,13 95:10	cell 88:10	check 5:5 264:8	164:19 264:19
171:3	95:21,24 97:11	157:21	264:19 265:21	271:12
buy 60:5,17	106:3 110:6,7	cemeteries	267:2 268:7	CITY-BG-516...

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 288

84:21	66:12,18 70:5	91:21 92:2	controlled 37:4	107:21 131:3
Civilian 119:20	73:5,5 78:1,1	233:22 236:15	37:6 48:12	131:21 132:1
cjg@kenlaw.c...	89:9 109:7	236:22 237:1	134:3 149:18	132:17,21
2:9	123:3,8,9,12	239:13,18,21	250:21 266:22	134:14 135:24
claim 133:12	159:3,9 162:20	239:22 240:4,8	conver- 128:4	140:23,24
257:13	162:21,24	241:11,15	conversation	148:16 149:4
claiming 112:15	168:18 200:1	242:20,23	67:3,13,18	149:16 152:4,5
114:4,14,24	200:17 203:22	243:11 244:1	68:4,7,11	156:24 161:3,4
115:1 121:10	205:14 206:1	247:17	74:18 76:11	163:20 164:2,3
197:13	232:13 235:11	confined 170:16	77:15 81:22	167:24 169:14
claims 104:6	235:14 265:8	confirming 76:5	83:22 87:4,12	170:7,10 172:4
112:16 250:18	comes 123:1,8,8	confronted	124:5 125:4,14	172:14,15,18
clarification	181:12	189:3 190:13	182:3 188:14	174:4,18
263:9	coming 73:1	congregating	199:22 277:14	178:11 181:13
classification	176:12,14	149:22	conversations	182:1 183:15
103:1,4	commencement	consist 98:2	231:24	183:22 184:13
clean 173:13,14	281:6	consisted 98:3	conversing 56:2	184:14 188:8
173:22	committed	constitutes	78:3,8	190:5,6,9,23
cleaned 178:18	132:24	281:13	conviction 104:7	191:3,4 192:5
clear 43:18	common 119:10	constructive	convictions	193:11 195:6
139:9 175:19	175:23	251:18 255:2	104:24 132:12	195:12,13,15
200:3 262:19	community	contact 115:21	Cook 89:3 90:14	196:2,3,6,17
client 191:15,16	119:10	116:3 120:10	96:4,12,19	196:20 197:2,3
191:20,20	complaining	120:13,17	97:6,9,17,24	197:14,15,20
197:14,16,19	131:15	121:5 122:11	98:24 99:1,6	198:2,10 201:5
223:20,23	complaint 11:22	122:16,21	100:9,14,17	202:2,14
224:17,18	complete 283:10	123:5 127:20	119:23 234:12	206:16 207:6,9
clients 27:4,7,8	complex 20:9	127:22,24	281:5	207:12,23
157:17	38:17 43:2	128:9 174:8,9	cool 23:15	208:3,6,20
close 275:8	48:14,22 89:24	199:5,10	Coordinated 1:3	209:7 210:23
clothes 63:10	complying	200:11	2:9 6:4 283:3	214:2,4 215:24
179:17	133:6,8	containing	cop 231:9	216:12,12
CNA 21:16,19	computer 9:9	262:19,20	243:19	217:21 218:15
21:23 22:11	142:24	continuation	copped 95:23	221:8,16,17,22
cocaine 34:21	concerned 75:12	247:4	copy 5:5 117:6	221:23 222:1,2
137:20 165:19	163:1	continue 262:8	corner 266:9	222:5,6 224:15
278:16	concerning	continued 3:1	correct 16:16	226:4,5 227:2
coffee 54:24	241:19 281:8	4:24 25:16	18:13 38:14	227:12,13,15
Coleman 151:21	concise 126:20	129:14 199:21	39:5 53:16	227:18 228:8
college 157:3	concluded 280:2	continuously	54:4,5 58:19	228:19,20,21
Collin 2:6 7:4	concludes	26:22	58:20 71:6	228:23,24
9:3 10:6 12:16	279:24	contribute	74:16 80:18	229:4,4,5,9,24
come 13:11	conduct 131:16	254:19	85:10 90:15	230:3,24 231:2
17:19 29:15	219:12	control 36:23	92:5 93:20	231:3,5,6,11
41:1 52:2	conference	37:5,8	99:2 103:7,8	232:7 234:13

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 289

234:14 235:2,3	108:13 119:23	128:24 129:7	D	183:15 184:21
236:12 239:22	234:12 281:4	cross-talk	dabbled 52:15	188:8,24 189:4
240:9 242:16	couple 75:5	188:12 213:9	DAFFADA 3:6	189:7,8 194:1
242:23 243:13	79:20 108:19	217:11 222:10	daily 123:11	194:5,13,15
243:17,21	course 30:12,12	260:13	DALEY 2:20	195:2,5,8,14
244:6,7,9,18	49:16 51:24	CRR 3:23 282:8	damage 81:12	195:24 196:11
244:19 245:8	104:20 223:22	CSR 1:10 3:23	damages 112:16	196:13,15,17
247:23 248:2,6	court 1:1 6:13	3:24 282:8,10	112:18	196:20 198:1
248:7 249:12	6:17 7:23 18:5	CST 280:3	dark 146:10	198:15 214:12
249:17,21	91:6,8 95:3,6,7	cuffed 198:12,15	date 12:24 86:12	215:1 216:18
250:2 251:4,8	104:6 130:2	198:16 210:20	95:6,7 96:9	217:5,24
252:21,22	136:3,4 211:16	cuffs 210:13,16	100:24 101:1,4	218:15,17
253:1 254:6,23	217:24 223:13	210:18	102:20,23	223:12 225:10
255:7 256:2,7	223:13 229:14	cup 54:24	118:2 143:4	231:22 235:11
256:11 257:5,9	232:14 234:23	currency 263:1	193:21 219:10	249:7,10 257:4
259:3,4,6,10	234:24 235:11	currently 13:19	240:16 267:24	261:7 266:13
259:11 260:1	235:16,19,23	13:22 18:8	281:16	276:15 282:3
261:7,8 263:15	241:6 246:8	24:15,23 27:3	daughter 15:11	283:20
263:16,20,21	254:23 256:15	27:4,5 32:3	15:15 16:7,13	days 108:16,20
263:23,24	259:5,9,13	custody 97:14	16:14 18:3	108:20 168:21
264:21 265:6	265:17 283:1	186:17 190:4,8	104:19	168:22 176:20
266:13,16,17	courthouse	234:9	day 31:19,20,22	186:11
267:2 268:1,2	136:7	customer 123:2	32:14,17 35:15	deal 94:10 96:1
268:4,7,18	courtroom 94:1	customers 40:24	35:17 41:13	106:7 108:17
271:17 283:10	94:7 234:13	159:3,4	42:2,3,6,9,10	109:6 231:4
Corrections	235:1,4	cut 24:21 25:17	42:16 47:17,22	248:5,14
98:20 100:22	courtrooms	33:3 40:11	48:2,7 54:10	dealer 141:10,13
101:19 102:14	235:7	43:22 122:15	54:15 56:9,12	150:15 151:13
102:22 103:3,7	CPD 174:16	123:2,3,12	56:15,16,17	151:14,23
103:11,16,21	266:21	157:6,9,11,15	57:10 58:9,9	152:7 273:9
104:3 190:9	crack 34:21	158:11 159:22	58:23 59:6,16	dealers 151:10
cost 31:23	35:10 50:8	160:2,5,15,19	59:20 60:11	271:16
counsel 5:2 6:15	278:16	161:11 166:21	62:4,10 64:19	dealing 237:6
9:16 10:4	Cracker 26:15	168:14,15	81:1 90:15	dealt 150:10
12:20 142:2	crazy 49:23	194:9	94:24 118:10	deceased 19:20
248:21 261:20	credit 269:23	cutting 25:6,10	118:11 126:11	20:5
281:19,20	crew 45:9	25:12 160:16	136:12 139:2,3	decide 91:24
County 1:11	crimes 132:21	160:21,23	139:10 141:7	168:22
89:3 90:14	132:24	161:1,7,12,13	148:5 158:20	deck 99:17
91:4 96:4,12	criminal 132:9	162:16,17	168:11,12,14	deep 124:5
96:19 97:6,9	227:1 233:16	167:13,22	168:15,17,23	125:14,14
97:17,24 98:24	241:24 254:19	171:3 194:6	169:2,8 173:9	defendant 2:18
99:1,6 100:9	257:24 258:1	195:2	174:2 178:22	2:23 3:5 6:22
100:14,18	crooked 119:11	CV 6:5	178:23 179:16	7:19 219:10
102:19 106:6	119:17 128:22			defendants 2:14

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 290

3:9 4:16 7:6	199:16 207:14	100:3	175:19 187:21	132:16 134:22
Defendants'	207:15 211:22	discuss 124:20	194:17 195:10	134:22 135:4,4
84:14,22	212:5,23 229:1	discussed	219:10 224:5,6	135:12,13
111:14,15	246:10 256:18	124:22 131:19	224:8 232:4	137:17 149:17
116:21,22	description 5:8	133:10	dollars 82:20	149:22 150:14
defender 90:17	64:22 212:7	discussion	Donuts 54:23	171:13 172:10
91:8 93:16,18	destroy 181:18	224:14 230:8	door 67:12	174:7,17 177:4
130:23 131:2	detained 262:15	dismiss 110:8	140:20 145:14	273:9 277:22
139:20 142:4	263:14	disposition	146:7 178:22	drug-related
147:22,22	detect 173:1,2	244:4	178:22,23,24	105:3
177:1 211:3	determined	dispute 159:22	180:21 181:15	drugs 8:20 30:6
212:24 213:4,5	98:10,14	162:13	181:16,17,18	30:17 33:11,20
213:6,18	developed	distribute 36:21	181:21 183:9	34:2,5,16,20
217:20 220:17	163:18	195:15,19	202:21,21	35:13,22 36:16
221:14,20	dharris@reite...	distribution	203:2 204:19	37:11,21 39:1
defender's	3:4	148:22 149:17	256:22	39:7,9 40:5,16
147:18 177:19	Dhaviella 3:2	175:6	doorway 256:17	41:6,21 42:16
definite 133:14	7:1 274:12	distributor	256:18	42:21,24 44:14
definitive 37:18	dibbled 52:14	37:11 195:16	dope 180:23	49:4 50:2
186:21 239:18	difference	distributors	182:24 183:3	53:19 56:9,12
degrees 22:15	244:20,24	271:17,19	Double 44:20	56:19 58:18
denied 95:12,13	different 32:18	DISTRICT 1:1	58:22 89:15,20	61:17,21 62:3
95:17	32:18 40:9,13	1:1 283:1,1	90:2 152:2	79:3,4,17,19
Department	47:10,11 48:8	division 1:2	downstairs	88:20 89:12
98:20 100:22	48:20,21 49:14	96:13,14 97:17	140:13,16	90:9,12 91:12
101:18 102:14	50:1,2,3 95:6,7	97:20 234:12	180:6 201:12	96:8 109:18,21
102:21 103:2,7	139:23 195:22	283:2	Dozens 141:1	120:11 133:5
103:10,16,20	196:4 228:11	divorce 14:2	drafted 118:9,11	137:19,22
104:3 190:8	237:8 260:15	29:18 30:2,9	drafting 118:13	138:2,6 140:14
252:15,18	271:23	131:21 133:22	dressed 179:16	168:12 172:17
depended 47:20	difficult 133:5,7	185:15	drink 30:24 32:9	174:2 175:11
depends 47:16	difficulty 131:20	divorced 14:5	32:12 51:13,14	175:12 176:2,3
depose 274:20	directing 124:22	14:19	53:3	176:5,7 178:20
deposition 1:7	direction 281:13	document 84:13	drinking 59:13	183:18,20,21
6:3,6 9:16	directly 131:17	85:3 111:13,20	Drive 3:3	188:18 190:14
12:11 118:22	191:8 281:21	112:6 117:15	driver 83:12,15	193:14,19
119:1 280:1,2	disadvantaged	117:18 118:22	83:17 86:21	195:12 196:1,2
281:10,15	27:21	215:16 267:5	drove 86:15	202:13,17,20
283:7,10	disappointed	267:13,19	173:5	202:24 203:8
depth 124:17	113:12	documents	drug 30:20,22	203:13 208:15
derogatory	discharged	10:10,12,13	34:20 36:24	220:18,19
129:9	186:16	11:19 12:18,18	48:12,20 49:1	222:14 224:22
describe 64:3	Disciples 24:14	doing 59:12	49:2,14,18	225:8,10
69:17 112:17	149:18 277:19	159:14,16,18	56:6 98:11,16	250:19 251:3
113:14 187:14	disciplined	166:13 174:3	98:21 131:24	251:22 252:3

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 291

254:20,21 255:15,16 256:10 257:12 257:13 263:19 278:9 279:9,12 drunk 30:24 duly 7:10,13 281:8 Dunkin' 54:23	Ellis 35:8 120:22 email 142:3,7 emotional 112:15,17 employed 24:16 24:19 26:22 27:12 28:17 29:10 employee 281:18,20 employment 29:12 encounter 178:14 179:23 185:9,24 186:4 186:17,23 187:15,16 189:13,22 190:12,14,19 191:2,15 196:24 202:9 203:11 encountered 88:3 177:22,24 178:3,9 184:18 184:19 186:14 198:22,24 encounters 191:5,23 ended 268:23 engage 148:22 277:14 engaged 259:19 engagement 181:7 engaging 260:3 ensuring 108:2 enter 60:19 94:9 95:14 256:21 entered 60:22 68:24 entire 26:23,23 96:5 97:21 entitled 242:8 entity 108:5	entrance 204:20 epalles@daley... 2:22 Eric 2:20 6:19 126:14,19,22 143:1 escort 67:4 68:18 86:16 escorted 83:4 86:20 87:1,5 escorts 71:5 essentially 246:21 256:4 estimate 70:24 evaluated 97:23 evaluation 98:2 98:6,8 135:12 135:13 236:1 events 257:22 eventually 197:10 everybody 125:15 142:6 203:24 244:14 evidence 92:3,5 224:14,15 226:2 227:11 227:24 232:2 237:13,18,21 254:22 255:6 259:24 260:21 exact 101:1 102:23 139:4 exactly 37:13 75:9,15 165:24 166:6 168:20 173:10 267:14 examination 1:8 7:15 126:15 156:15 271:8 273:2 275:13 279:5 281:7 examined 7:13 exchange 240:24 242:12	259:20 excuse 225:20 235:22 277:7 exhibit 84:14,23 111:14,16 116:21,23 143:4,22 215:10,11,14 240:18,19 247:5,5 255:24 262:8,10 264:12,14 265:15,22 267:9 270:3 EXHIBITS 4:16 5:2,10 exit 63:1 exited 65:13 exonerated 269:7 experience 157:6 explain 218:11 235:22 explained 230:20 explaining 147:23 extension 37:9 39:12 171:21 171:23 172:4,7 178:5 187:18 extensions 172:1 178:16 179:6 271:17 extra 102:10 171:6	face-to-face 181:7 faced 201:14 206:5 facility 27:14 101:19 102:3 facing 71:3 72:12 140:18 207:22 208:9 230:21 fact 116:1 120:19 131:20 131:23 244:3 facts 237:8,9 241:18,21 fade 168:19 fades 157:10 fair 8:14,15 fairly 141:14 false 121:10 257:20,23 familiar 112:6 117:17 252:12 252:14,17 family 23:19 27:19 far 67:11 84:11 135:11,13 147:6,24 162:24 194:20 202:16 203:2 210:5,9 222:9 275:19 fast-forward 219:4 fat 64:7 233:2,5 233:8,12,17 fe- 216:13 feather 129:11 February 161:10,11 federal 86:7 120:3 feel 113:15,16 115:8 242:3
E E 4:1,15 5:1 281:1,1,1,1 earlier 7:18 30:8 85:16 103:24 115:20 128:21 153:23 168:3 202:12 206:14 217:13 229:6 245:5 258:17 266:12 271:15 early 107:14 174:17 176:1,6 earn 138:2 East 39:15 102:6 102:7 277:8 EASTERN 1:2 283:2 education 20:12 effect 115:3 173:12 eight 107:1 either 18:3 126:1 136:6 137:16 168:3 172:23 186:5 205:1 238:6,6 elapsed 201:20 elect 125:17 elevators 69:20 69:20 elicited 274:14 eliminate 147:1 Elizabeth 2:2 6:23				
			F F 117:2 281:1,1 face 45:11 80:20 80:23 81:4,19 85:22 173:7 207:17,18 209:9,12,14,16	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 292

feelings 114:1 115:17	finish 8:6 25:21 262:7	fishbowl 235:5	245:9,17 246:3	114:7 139:15
fees 159:23	finished 274:7	five 32:7 35:19	250:10 251:13	182:8 223:9
feet 79:20	firm 269:14	40:3,4 52:19	251:23 252:4	228:12 245:3
202:16,18,24	firms 155:13	63:6,7,13	253:2,6 254:1	245:10 246:3
203:5,8 250:19	first 7:12 12:9	70:10 77:7,14	254:7,14 255:8	255:19 268:12
251:3	12:19 13:13	156:3,5 203:5	255:19 260:8	former 20:9
fell 81:7 209:6	15:9 16:12	206:15	260:14,18	forth 73:1
felonies 132:11	20:3 30:19	five-minute	261:9,12,15,17	274:17,19,23
felony 104:23	31:9 34:15,19	50:11 101:6	261:21 264:22	forward 126:13
107:2	38:6 43:15	five-oh 173:17	268:12 269:14	fought 99:21
felt 113:2,12,20	56:13 57:3,22	173:17	270:23 274:4,7	found 176:15
115:5 128:23	58:12 62:17	fix 126:23	274:12,18,22	220:19 222:14
129:2,7	69:11 70:3	210:10	279:19	229:7,10,20
female 213:15	83:1 89:9,17	fixed 210:23	flock 129:11	230:7 240:6
213:21,23	90:24 91:2,2,4	Flaxman 2:5,6	floor 2:3 69:22	251:3,22 252:3
216:5,12,13,14	99:1,4 101:17	7:3,3 9:1,5	70:4 137:1	254:21 256:10
229:3	103:6 105:12	10:5 11:4	140:4,14	263:14,19
fight 91:17	105:15,18	12:16 14:6,9	146:11,20	267:22 268:4
99:14,15 221:7	115:14 127:18	15:8 25:21	179:12 254:21	268:17,19
248:9,11	127:19,20,21	31:2,5 71:9	277:9,11	foundation
fighting 213:7	127:24 144:9	84:17,19 109:8	folks 144:1	114:8 134:24
238:4	146:11,20	114:7,19	follow-up 273:1	135:5 169:15
figure 153:14	151:4 152:3	116:18 117:7	279:3	174:21 214:14
240:9	154:10 163:4,5	118:14 126:14	following 30:9	216:7 218:16
file 91:21 142:4	163:9,14,15	126:22 127:5,8	53:9 96:11	221:18 226:12
251:11 269:10	171:12 174:8,9	134:23 135:5	99:6 100:9,13	227:3,16
filed 120:24	174:12,16	139:15,17	100:18 103:3	237:14,24
121:8,16	175:4,10	142:9,13,17,20	103:16,21	239:23 240:11
123:15,18,22	177:21,24	142:23 143:12	113:23	244:22 245:9
132:7	178:3 179:23	144:2 156:1,6	follows 7:14	246:3 251:13
files 147:18	181:6 185:9,23	156:8 169:15	food 277:23	252:4 254:8
finally 151:20	186:4,17	174:20 182:4,7	foot 210:8	255:8,19
financial 53:15	190:12 192:2,6	198:3 203:14	279:15	264:22 270:23
financially 30:4	192:8,9 196:21	214:14 215:5	Ford 169:17	four 26:8 31:22
30:10	198:22,23	216:7 218:4,16	170:3	32:7 35:19
find 29:19 48:3	199:2,5,19	218:23 219:17	Ford's 169:14	37:19 40:3,4
119:2 143:20	203:9,11,19	220:2,9,24	foregoing	63:6,7,12
188:3,17	204:21 205:2,5	221:18 223:9	281:10 283:7	95:23 96:1
189:10 232:21	206:18,21	225:4 226:9,12	forehead 70:19	147:7 206:15
243:15	208:10 214:17	226:15 227:3	foreheads	framed 222:14
finding 62:10	222:12,19	227:16 228:3	203:24 204:2	224:18,21
fine 14:16	232:22 266:18	228:12 229:16	forget 10:23	231:10
142:16 154:2	272:11 276:23	237:14,24	122:1 153:13	frames 197:10
217:10,14	277:1 278:2	239:23 240:11	forgot 115:19	free 170:24
		243:6 244:22	form 109:8	174:7

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 293

freelance 174:7	42:5 47:13	82:19 88:7	156:20 161:16	ground 72:7
frequent 64:9	135:12,13	96:15 97:16	171:14 181:8	78:15 79:3,5
Friday 158:22	174:13 188:1	99:12 101:19	185:12,15	79:18 201:21
friends 13:10	201:20 202:8	101:21 106:15	187:13 190:18	202:1,6,14
58:5	231:10 261:1,1	106:17,18	202:21 204:6	203:21,23,24
front 9:10 85:6	271:4,22	108:9 109:9	209:20 215:9	205:14 206:1,5
110:13 142:6	Gibson 151:18	110:13 112:11	218:8 219:18	208:16 209:7
142:12 201:22	Giles 160:8,11	114:9,20 124:5	229:11 232:13	220:19 222:14
209:1 218:22	160:12,12,14	125:13 126:13	235:19,20,23	223:8 263:19
228:10,17,22	Gill 2:6 7:4 9:4	126:14,20	240:16,17	growing 13:10
256:19,23	girl 179:3	127:9 133:21	247:13 248:16	53:16
frustrated	give 15:8 32:22	143:21 148:10	253:2 255:7,23	guess 50:1 52:15
112:21 113:15	37:17,19 41:11	153:3 157:2	261:21,22	55:1 73:3
113:16,17	48:15 70:24	161:5 166:20	262:6,7 264:12	79:21 80:2
261:1	101:1,3 130:12	170:24 186:22	265:14 267:4,5	113:9 154:20
frustration	130:15,19	188:14 189:12	267:12 270:12	154:22 168:24
115:9	133:13 139:4	189:16,19	270:15 273:22	201:24 206:3
Fuddruckers	171:16 183:2	198:21 205:5	274:10 279:20	219:22 220:14
26:15	186:20 212:7	210:9 221:11	good 6:1 7:17	221:9 238:2
full 12:22 49:22	229:11,14,20	221:13,13	27:7 47:24	240:13,13
212:7	239:17 276:11	224:4 229:19	117:13 127:13	245:20 264:10
fund 132:24	given 119:19	254:6 255:11	151:9 196:10	265:11
funny 108:1	281:14 283:7	255:23 258:10	248:14,19	guilty 176:21
further 271:6	283:11	258:24 265:2	253:12 271:3	229:7,11,20
272:23 273:2	giving 134:17	267:15 270:13	gotten 115:13	230:7 239:22
274:8,11	219:7,16	273:22 274:16	government	240:6,10
275:13 279:5	256:14 259:16	274:18	89:16 120:3	268:17,19
future 154:17	glad 271:4	God 271:5	121:18,21,22	guy 25:8 43:14
Fuzz 151:11,12	glasses 81:1,4,10	goes 249:6	121:24 122:5	46:9 87:21
	81:12,15 85:10	going 7:20 11:5	137:3	122:4 141:4
G	85:12,17	29:16,17 30:1	grab 199:17,18	150:1,3,11,11
gang 22:18,20	196:17,19	57:9,12 60:5,7	200:12,12	151:11,21
24:10,13	197:1,1,4,8	60:8 61:4	grade 20:13	152:22,24
Gangster 24:14	198:10 207:12	66:22,23 84:13	48:18	153:14,18
149:18 277:19	209:6,9,11,13	88:3 94:13	graduate 20:17	162:2 212:2,16
Garden 26:14	209:24 210:3,5	96:1 111:12	20:19,21	212:17 213:2
Gary 20:4	210:11,23	112:2,11	graduated 30:23	272:9
GDs 170:19,20	go 20:15 28:9	113:19 116:20	grass 106:16,17	guys 69:13
gears 50:12	41:24 44:22	117:20 118:14	106:18	71:18,23 99:16
general 149:9	51:19,20,20	119:5 126:19	great 8:2 84:19	124:19 149:24
252:15	54:19 57:1	136:2 140:4	Greedy 122:2,12	154:12,13
generally	60:9 61:4	143:5,17,19	Greedy's 154:3	155:17,21
149:18,20	66:22 72:23	148:2,10	green 97:2,2	170:19
154:24	73:2 74:23	150:18 155:7	grew 38:10	
getting 41:20,21	77:9,13,20	155:10 156:1,8	GROBLE 2:20	H

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 294

H 4:15 5:1	hang 57:16	206:5 207:5	hereunto 282:1	27:20,22,22
Ha 31:4	191:11,11	heads 70:18	heroin 30:24	42:9,13 54:24
habit 36:1 133:1	200:2 207:21	204:2	31:10,12,14,17	160:16,23
hair 24:21 25:6	207:21 208:17	health 100:12	32:1,13,14,16	162:16,17
25:10,12,17	272:24	103:14 113:24	33:8,9 34:8,21	homes 149:15
122:15 123:2,3	happen 71:16	114:4	35:9 42:5,9	honestly 115:5
123:12 157:15	184:7 235:15	hear 8:1 15:6	50:6,22 51:2	Honor 241:7
167:22 168:14	235:23	43:23 52:7	52:12,18 59:16	hospital 99:13
168:15 171:4	happened 65:5	78:9 92:12	59:20 60:3,5	hour 10:2 59:10
194:6,9 195:3	74:1,11 76:15	93:15,15,21,22	60:17 96:17	59:11
hairecut 158:1,2	79:1 95:10,20	127:8,12	107:17,20	hours 274:20,21
158:4,8	99:19 106:3	241:17,20,23	110:6,17 111:5	274:22
hairecuts 157:8	107:23 177:9	250:10 251:23	111:9 137:20	house 19:7
hairstyle 246:17	177:10 202:5	heard 68:15	163:16,19	25:11,13,17
HALE 2:11	220:23 233:21	93:19 94:17,18	165:18,20	38:19 106:5,11
half 10:2 28:2	243:23 261:3	94:21,22 95:4	193:24 194:2	161:12,13
51:16	happening 78:2	128:21 129:6,8	195:6 262:21	housed 96:12
hallway 69:16	230:24	hearing 5:3 92:5	263:15 278:13	97:17 103:20
70:2,3,8,12,16	happens 91:22	92:8,11,14,17	hey 261:19,19	household 16:7
71:3 72:12,16	236:24 237:3	92:20,23 93:3	Hi 126:17,18	houses 38:20,21
74:6,20 75:4	259:5	94:3 95:1	156:18 271:10	187:18
77:5 78:20	happy 242:5	130:5,6 131:13	high 20:17 23:2	housing 20:9
79:19 80:5,9	hard 115:17	135:23 177:16	141:12,14,15	HR 244:11
80:15 82:9	232:7	211:10,13,16	277:23	HRDI 244:5,12
145:13 146:6	Harris 3:2 4:8	211:19,24	high-rise 43:1	244:16,21
146:19	7:1,1 271:9	212:12,16,21	higher 22:15	268:24 269:22
hand 117:8	272:23 274:12	212:22 213:1,6	highest 20:11	270:10,17
172:17 197:17	274:14	214:1 215:19	history 132:9	huh 152:13
197:18,20	Harrison 149:11	216:21,22,23	133:10	168:7 209:12
198:2 200:13	149:12	217:2,4,5,21	hit 181:4,4,5,12	223:19
200:16,23	Harvey 1:7 4:4	218:5,22	181:14 182:21	hustle 168:22
201:1,2 207:9	4:18,21 6:3	221:15,21	182:22	hustling 163:4,5
209:3 282:2	7:11 12:23	222:1 227:8	Hitting 207:11	163:8,15
hand-to-hand	13:3 111:23	228:7,10,17	hold 22:14 127:2	Hyde 20:20
219:13 237:23	117:3 241:8	236:4 239:8	127:10 182:7,7	
259:19 260:3	260:8,9 283:15	243:13,17,20	253:6,6 260:2	
handcuffs 72:6	hat 148:18	250:5 263:7,23	260:2 274:4,4	
82:4,6,8	HBO 13:8	height 246:14	274:7	
198:18	167:16,19	held 6:6 70:11	holding 69:8	
handing 196:1	he'll 122:24	Hello 156:17	88:10	
handled 212:12	218:18	271:11	hole 100:5	
221:21	head 46:12	help 96:21	holiday 167:4	
hands 70:18	70:18,19 77:23	135:18 162:19	holler 173:6,13	
200:20 204:1,1	157:24 167:9	245:8 269:22	173:21,22,23	
208:11,12	167:11 201:18	hereto 281:21	home 18:15 22:1	

I

ID 73:14,14,16
73:21,23 74:2
74:3,12,13,16
276:11
Ida 20:9 34:23
35:2 36:17,24
37:8 38:16,19
39:12 43:1
48:14,21 89:24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 295

90:1 120:12 121:11 131:14 144:11 149:15 149:21 150:4 178:5,16 179:6 idea 109:17 113:18 148:6 276:9 identify 6:15 IDOC 101:2 102:19 103:13 176:19 186:16 190:4 258:24 259:3 269:4 IDs 73:3,8,11 202:8 III 12:23 illegal 30:16,20 56:6 148:22 164:4,8 Illinois 1:1,10 1:12 2:3,7,12 2:17,21 3:3,8 3:24 6:12 18:11 98:20 100:21 101:18 102:14,21 103:2,7,10,16 103:20 104:3 132:10 190:8 266:22 281:5 282:3 283:1 immediately 243:12 impair 8:21 important 257:8 impossible 225:13 238:6,8 261:2,4 impression 230:6 imprisoned 112:20,24 in-custody 244:18	Inaudible 15:4 263:8 incarcerated 96:16 97:24 98:23 99:5 100:13,17 103:15 115:6 244:8 incarceration 114:6,18 257:21,23 incident 134:9 184:2,7 185:3 185:13 includes 283:11 income 166:2,5 166:10 incorrect 139:14 indicated 85:16 indirectly 281:22 Indiscernible 51:18 54:18 186:9 individual 2:14 4:16 6:22 7:19 47:23 49:8,8 49:10 55:18 58:21 62:2 66:3 84:14,22 111:13,15 116:21,22 120:16 169:23 individual's 62:6 89:16 individuals 24:6 37:12,15 39:22 44:24 45:5 46:14 47:11 48:8,11 58:1 58:15,17 69:7 69:10 70:11 74:19 75:4,7 77:19 120:11 121:7,14	259:21 individuals' 32:21 37:21 infection 164:15 influence 8:19 133:5 informant 108:22 information 242:2 ingest 32:1 initial 127:24 initials 13:13 initiated 227:1 injuries 81:19 99:23 114:5,15 injury 99:11 innocent 94:14 inpatient 51:8 inside 61:22 67:9 69:2 167:17 201:4 201:20 222:19 222:20,23 224:6,11 238:7 instance 49:6 Instanter 6:10 Institute 21:12 instruct 118:15 interacting 259:17 interested 139:9 281:21 interrogatories 4:20 111:24 interrogatory 10:13 interrupt 169:9 189:18 interviewed 136:7 introduced 278:5,6 inventoried 263:4	inventory 5:7 263:2 267:16 invest 155:12 involved 99:7 103:11 128:1 147:12,14 149:3 167:23 175:5 Irish 216:5 issue 160:18 163:3 233:16 266:15 items 263:2,3 <hr/> J <hr/> J 2:6 jackets 187:11 Jackson 2:12 jaf@kenlaw.c... 2:8 jail 89:3 90:15 91:5 96:5,12 96:20 97:6,10 97:18,24 98:24 99:1,7 100:9 100:14,18 108:16 276:13 Jamar 151:7 January 111:4,6 136:11 161:5,8 166:21 192:22 193:7,13 Jay 141:5,6,9,21 172:7 job 22:4,8 232:4 Joel 2:6 7:3 84:15 117:4 126:12 142:1 143:6 155:24 182:11 218:9 219:22 243:8 261:19,19 274:17 275:1,3 275:6 Joel's 142:5	JOHNSON 2:15 joint 117:1 142:21 143:19 189:23 190:1,3 190:18 215:15 215:15 243:9 273:13 Jones 10:23 93:8 93:11,13 212:4 212:6 214:7,10 219:6 237:22 238:15 245:20 246:20 249:11 255:14 259:15 Jones' 219:20 Jr 248:22 judge 94:11,15 95:12 96:8 110:13 129:17 129:20,22 212:12,20 213:11 216:12 216:14,16 218:2,21 228:11,18,19 228:22 229:1,3 229:3,13 234:12,15 235:4,6 236:23 239:19 240:5 241:1,13 242:10,13 268:24 269:6 270:9,16,21,22 Julia 216:17 July 29:5,9 54:7 54:22 56:4,8 56:24 57:20 89:6 90:7 91:13 92:24 98:24 99:6 103:3,17,21 113:23 114:5 114:15 115:10 118:7 119:24
---	--	--	---	--

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 296

120:3,7 126:3	150:22	78:9,14,19	152:12,16,16	237:16 238:20
128:8 131:19	kneeling 70:16	79:15,20 84:5	152:18,20	238:21 239:19
131:24 138:15	knees 70:17,20	84:5,10,11,11	153:9,15,17	240:2 244:11
138:15 161:3	71:3,15,20,23	86:1 87:22	154:3,14,18,19	244:13,24
184:9,12,14	72:7 75:11	88:7,8,11 89:9	155:4,10 159:1	245:12,13
185:2 190:22	76:20 77:5	89:15,17,18	159:1,3 162:2	246:12,15
191:6,23 192:4	78:12 140:18	90:4 91:19,22	162:23 165:12	247:1 251:15
192:15,17	146:18 201:13	93:4,6 95:16	165:15 166:18	251:20 252:6,6
193:11,18,23	knew 38:3,3	95:18 98:7,10	167:2,3,16,19	252:23 253:14
194:11,12,21	45:11 58:16	98:14 105:22	167:21 168:2,4	253:14,17
196:6,8 198:24	75:14 94:13	106:16 110:9	169:1,3,3,18	255:10 263:14
199:5,11 211:7	113:10 143:16	110:12,12	169:19,21,22	269:18,20
218:20 219:5	152:19 162:19	111:11 113:7,9	170:2,4,14,15	270:13 272:14
266:20	169:21 178:1	113:10,11,12	170:18 173:3,3	272:14 273:4,6
	178:19 246:15	113:18,20	173:4,6 174:11	273:12,18,21
K	273:7,8 278:8	115:2,4,16,17	174:24 175:21	274:6 275:19
K 3:7	knocked 178:21	116:13 118:10	177:6,16,22	275:22 276:2,5
Kallatt 2:23	178:22 181:15	120:14 121:13	178:2,18,19,20	276:20 277:10
6:19 127:17	181:17 209:9	121:15,16,19	181:4,7 182:19	277:11,12,13
keep 7:24 23:21	209:11,14,15	121:23,24	182:20 183:6	277:15,16,18
85:21 120:10	know 8:5,11	122:3,4,4,5,19	183:19 184:24	277:21,23
120:13 122:11	14:13 26:15	122:24 124:2,3	185:7 187:8,11	278:5
122:16,21	27:18,20 29:17	124:4,5,6,6,9	187:12,19	knowledge
123:4 124:7	29:18,19,21,23	124:22,23,23	188:17,18	119:10 273:11
125:15,16	29:24 30:1	125:2,11,12,13	190:15,16,17	276:4,7,10
156:1,8	32:22 36:2	125:14,15,19	191:10 193:22	known 89:6,20
Kenneth 2:5	37:24 38:4,12	125:22 126:1	194:14,15,17	119:16
125:23 248:22	38:14,15 41:17	126:23 129:1	194:22 195:1	knows 125:11
255:13 256:13	42:2 43:15	129:10,10,13	197:22 199:19	135:6 150:8
264:21 267:21	44:16,23 45:12	130:10,12	199:20 200:17	Kosoko 2:16 4:7
Kenny 247:3	47:20,21,22,24	131:10,20	200:21 201:9	4:9 7:8,8 143:1
kept 174:13	48:1,16,17,17	133:18 134:24	201:23 203:4	155:23 156:5,7
kids 27:17,21	48:18,19 49:2	135:6 136:16	205:9,11,17	156:16,19
killed 34:3	49:5,22,24	136:17 137:4,6	208:14 209:17	157:22 169:16
kind 29:23 47:3	52:14 55:4,13	137:9,11,11,12	209:21 210:7	175:1 182:11
49:23 96:24	55:14,19,21,21	137:16,21	210:19 211:20	182:12 188:13
97:1 113:5,10	55:21 56:1	138:5 141:4,6	212:8 213:3	198:8 203:18
129:13 141:16	57:12,14,15,17	141:9 143:8	214:9 220:9	204:7 214:22
153:13 154:23	58:8 61:2,8	145:3 146:5,22	226:17,19	215:8,13
157:8 158:23	63:23,24 64:7	147:3,6,10,11	227:5,9 230:18	216:10 217:12
159:2,18	64:15 65:24	148:8 150:6,9	230:20 232:1,2	218:8,13,19
162:24 165:22	66:20 72:24	150:11,14,17	232:22 233:12	219:3,21,23
170:23 224:8	73:1,2,5,10,13	150:20 151:4,6	233:13 235:20	220:4,5,15
239:15 278:13	73:20 75:9,13	151:8,11,12,18	235:21,21	221:4,19
Kirksey 150:21	75:13 77:21	151:22 152:3	236:17 237:3	223:15 225:14

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 297

226:1 227:6,19 228:6,15 229:22 237:19 238:12 240:3 240:14,21 243:8,10 245:4 245:14,22 246:9 250:12 251:16 252:1,8 253:10 254:4 254:17 255:12 255:22 260:10 260:16,20 261:19 262:5 263:12 264:16 265:1,16,20 266:1 267:11 268:16 270:5 271:3 272:24 273:3 274:10 274:21 275:1,3 275:7 kosokoa@jblt... 2:18	199:23 LaSalle 3:7 6:11 late 56:14 163:7 163:12 laughing 55:22 61:6 law 2:5 155:13 275:4,5,9 lawn 106:16 laws 129:22,23 228:22 229:1,3 229:4,7,13,19 234:15 235:6 241:1,13 242:13 266:24 268:24 270:9 270:16,21 Laws' 234:13 235:4 269:7 lawsuit 7:19 112:17 120:24 123:14,18 124:1,7,13,16 124:19 125:3,7 160:18 lawsuits 121:8 121:17 123:21 lawyer 116:17 124:23,24 lawyer's 8:24 lawyers 261:18 laying 180:3,4 180:15,16 leading 145:14 leads 146:7 239:22 259:3 lean 15:5 learn 93:2,12 learned 157:5,5 leave 22:7 28:5 80:3 led 251:7 255:7 257:20,22 left 78:19 80:3,5 80:9,11,23	109:3,4 180:21 183:8,9 197:18 197:20 198:2 200:21,24 201:3 204:12 204:15,17 207:9 209:3 left-hand 266:9 left-handed 197:23 legal 6:10 175:21,22 legs 208:12 LEINENWE... 3:6 Leonard 151:17 let's 50:10 107:14 121:22 129:4 133:21 156:7 161:5 166:20,20 171:10 186:22 190:11,20,20 190:21 196:14 196:14 198:21 211:7 221:11 240:15 250:24 261:19 270:21 letter 5:6 266:6 letting 77:8,13 77:20 level 20:11 141:14,15 Lewis 151:7 lie 251:7 life 23:20 29:22 257:8 271:4 lifetime 164:5 light 44:19 58:5 58:17 59:15 61:4,16 65:20 65:21 66:4 159:2 187:11 232:16 Light's 65:24	limited 132:10 line 49:1,2 158:7 158:9 168:19 204:6,9,15 278:10 lined 69:16 74:19 202:7 205:7 206:8 lines 48:20 49:13,14,18,21 lining 158:5 linings 157:12 Lionel 122:3,22 123:17,20 124:12,19 152:21 153:1,9 153:9,15,17,20 153:23,24 154:12 liquid 97:2 list 273:22 listed 267:19,21 listen 127:16 202:22 205:23 223:3 260:7,7 little 17:7,14 27:23 28:15 45:9 55:1 58:9 109:13 111:2 115:14 126:22 148:12 153:2 162:11 171:5 268:21 272:13 live 15:17,18 16:9,19,22 17:3,13,19 18:13,15,24 38:9,16 89:10 89:23 90:1,2,6 110:15,18 136:19 277:4,5 277:6 lived 16:6,11,14 16:18,20,22 17:5 18:18,21	19:2,13,18,19 19:22 24:11 38:12,18 90:4 105:18 107:6 107:21 109:18 109:21 110:1 110:19,21,22 110:22 139:23 164:21 277:7 living 13:15,19 18:20,23 26:13 38:4 105:5 178:4 180:10 180:11,15,22 182:20 LLC 3:6 lobby 69:17,19 69:24 140:14 145:1 204:19 204:20 located 6:11 8:23,24 20:8 28:3 160:7 234:21 location 19:7 35:5 219:11 locked 113:22 lockup 87:10,12 88:4,7,19 89:2 94:7 136:6 235:1,12 Loevy 2:2,2 6:24 6:24 long 9:23 10:1 17:1,17 18:18 25:2 26:6 27:24 28:13,14 34:1 35:9 51:14 59:8 60:22 61:9 65:2 70:21 89:2,5,20 94:8 95:24 97:4,4 101:24 102:7 102:11,13
---	---	--	--	--

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 298

106:19,23	111:1	marijuana	170:14 173:3,5	192:3 277:19
109:6,12	love 275:1,3,9	30:23 32:4,6	177:11 179:11	members
115:12 139:1	low 164:21	Mario 46:18	179:12 182:22	119:11 192:10
159:15 160:4,6	lunch 155:24	Marjorie 129:23	194:8,20,23	memory 54:7,14
160:6 161:18	lying 79:13	229:4,7,13	195:17 196:7	131:7 196:10
164:4 174:6		mark 84:14	199:1 200:16	men 64:16,17
177:4 190:12	M	111:13 116:21	209:8,19	202:6
190:15,17	M 1:9 2:2 3:23	143:2,3 149:9	210:24 211:1	mental 100:12
201:19 205:13	4:1 281:3	215:14 240:17	212:13,13	103:14 113:24
205:24 209:15	282:8	240:17 264:12	230:19 231:23	114:4,14
248:18 269:16	ma'am 10:8	265:15	232:3,4,8	mention 223:20
269:19	12:8 13:16,18	marked 62:22	238:5,13,19,21	232:16 233:4
longer 77:4	21:8 29:4 56:7	240:16	238:23,24	mentioned
207:22	56:10 57:8	market 149:22	239:2,14	58:16 250:6
look 14:6 21:4	83:21 87:2	marks 81:19	250:22 253:14	mentioning
61:17 112:3	90:16 92:6,15	marriage 14:2	258:10 268:14	138:13
117:5 246:11	111:21 118:1	married 13:22	276:11 278:6	mess 47:24
246:24 269:6	119:8	13:24 17:1	meaning 37:11	messed 61:13
looked 64:4 65:2	mad 113:6	185:14	means 40:23	met 12:9 38:6
looking 29:12	Madam 265:16	matter 6:3 116:1	49:2 172:16	90:24 91:3,5,8
62:4,8 95:18	main 169:8	120:19 211:10	204:24 252:24	136:2 278:2
142:24 143:13	making 35:21	226:3 227:21	meant 30:7	methadone
143:15 188:11	35:23 36:1	229:15 231:1	media 6:2 50:15	51:13,14 53:3
188:16 195:11	220:2 222:21	234:9 236:11	50:19 101:10	Michelle 1:9
239:4,15	male 131:3	236:15 237:21	101:14 120:7	3:23 6:13
246:20	169:23 212:20	274:15	156:10,13	281:3 282:8
looks 69:18	213:14,16,18	matters 259:5	262:3 279:24	Michigan 2:7
146:4	213:21 216:11	281:9	medical 99:23	mid 111:3
Lord 22:21	man 64:19 66:17	Maura 216:6	100:16 103:19	midday 41:16
Lords 22:23	78:16 79:11,14	max 229:11,15	medication 8:20	168:4
23:4,7,10,13	84:3,3,5,7	maximum	97:5	mind 51:20
23:17 24:5,8	90:20,22	130:12,18,19	medicine 96:24	155:21 275:12
148:15,21	113:19 163:1	229:9	97:1	mine 79:7,12,14
lose 130:11	180:7,18,19	McGRATH 3:7	meet 9:15,18	79:16 84:6
lost 29:23	183:9,9 186:19	7:6,6	135:22 241:15	206:23 209:5
130:18 230:22	187:19,23	mean 33:3 40:11	277:1	224:22 231:20
lot 24:6 26:14,16	188:1 192:12	40:22 44:11	meeting 9:23	254:21
27:18 57:13,15	193:21 204:11	47:19 48:24	10:1,3,9 12:14	minimum 229:9
57:15,16,20,23	204:14,18	49:1 53:6 59:6	12:15,19 52:3	Minneapolis
58:10,13 82:17	206:22 207:1	68:12,13 75:13	121:4	15:18,21 16:20
123:7 132:16	209:18,18,19	115:11,12,16	meetings 6:7	17:4,5 18:21
132:24 180:23	210:2 233:2,5	122:24 129:11	51:23 52:1	19:3 26:19,24
273:15	233:8,12,17	133:17 141:15	Megan 3:7 7:6	27:11 28:13,17
Louis 20:3	239:2	148:3 150:23	member 22:22	105:5,13,19
110:21,23,24	manager 277:21	154:19,19	23:3,13 148:14	107:6,13,21

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 299

109:19,22	76:5,12,16,21	26:9 102:2,10	N	names 20:2
110:1,15,18	77:5 78:7 80:6	102:15 103:10	N 2:5 3:2 4:1,1	32:21 37:21
111:3	82:7,24 83:6	107:1 134:5	Nah 36:18	45:11 46:13,13
Minnesota	119:18 127:17	160:5 161:20	name 6:9 7:18	49:15,18,20,23
16:20 22:9	127:19,20	185:2,4,8,8,11	12:22 13:3,13	50:1 63:17
26:13 28:8,9	128:9,21 129:4	187:13 258:10	14:18,20 20:4	64:15 73:4,8
28:22 110:23	143:3,22	258:21	21:24 22:3	73:11 75:6
minute 132:6	179:19,24	morning 6:1	26:3 27:15,22	77:18 121:18
minutes 59:10	180:13 183:2	7:17 54:22	27:22 32:24	121:22,24
59:11 71:1	183:14 198:20	56:4,20 60:2	43:15,19,20,21	150:19
72:9,11 74:21	199:8,10 200:6	142:3 187:20	43:21,24 62:6	narcotic 255:3
77:8,14 126:12	200:10,20,22	187:24 188:5	63:23 65:24	narcotics 33:16
206:3,6,7	201:14 202:5	188:20	73:15,17 88:11	47:7 148:23
261:20	203:7 205:19	mother 13:14,20	89:16,17,18	149:4 150:4
misdeemeanor	205:20 208:1,5	18:13 19:13,22	93:3,4,6,13	163:10 164:1,5
107:2,3	208:23 249:24	104:21	122:1,3,5	164:8,12,18
misdeemeanors	253:18	mother's 19:15	125:20,23	166:8,14
132:20	Mohammed's	19:17	126:19 131:6,9	167:23,24
misstating	131:16	mother-fucking	137:3,6,10,11	169:3 175:5,6
203:14 225:4	MOHAN 2:20	180:23	137:12 150:1	189:7,10 190:9
229:16	Moline 102:6,8	motherfucker	150:24 151:2,4	195:15 219:13
mistaken 90:23	moment 144:8	79:13	152:3,18,19	223:7 227:24
107:4 212:19	169:5 208:24	motion 91:21	153:3,16 154:3	251:19
mixed 271:22	250:18 257:8	92:2,4,20 93:3	154:9 155:19	near 57:17
mkm@ilesq.c...	269:5	93:15,20 94:18	156:17 157:11	165:15 206:19
3:9	Monday 158:24	94:21,22 95:5	159:21 162:3	need 8:4 66:19
Mm-hm 19:11	158:24	95:13,17 130:5	167:18 169:18	159:13 164:24
21:3 46:2 50:4	money 35:21,24	227:10 228:14	169:20 170:2	181:8 224:3
60:1 71:7	36:2 53:14,19	236:3 239:8	185:17,20	232:23 254:12
74:17 86:10	53:24 54:3	243:12,16,20	192:21 211:20	needed 53:21
134:12 158:3	60:16 82:15,18	245:16 248:2	211:21 215:24	54:2 135:18
158:10 159:20	82:22 104:6,9	256:1,4 263:6	216:5 233:5	162:19 224:4
161:23 168:6	104:13,18,21	move 17:9	249:7 266:9	245:7,7
173:15,24	124:3 155:7,11	254:14	267:18 272:5	needs 164:2
178:12 194:13	166:13 171:1,1	moved 26:17	272:11 276:12	neighborhood
204:10 206:13	264:2 265:5,8	moving 22:9	276:15,19	24:6 32:19
209:22 210:22	265:11	27:11	named 32:24	55:15 122:19
241:12 248:3	MONICO 2:11	mow 106:16,16	43:14 46:9	164:20 165:1,3
Mohammed	Monroe 2:16,21	106:17,18	49:21 122:4	277:3 278:7
2:23 5:10 6:20	month 53:24	Mug 4:17	136:13 141:4	neither 221:24
63:19 67:19,20	102:20 109:13	mugshot 84:16	150:11,11	never 30:14
67:23 68:3,9	109:13 120:20	multiple 271:16	151:11,21	51:20 110:10
68:22,23 69:24	184:6	municipality	162:2 169:23	133:7 152:19
71:5,17,22,24	monthly 52:22	108:5	272:4	189:6 214:18
72:20 76:1,2,2	months 17:18,20			214:21 225:2

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 300

226:7,24,24 259:9 263:17 263:22 264:4 272:15,21 new 274:15 news 120:7 nice 58:9 178:19 nickname 13:5,7 13:9,11 43:19 58:22 62:7 63:24 122:2 153:21 272:12 nicknames 32:23 44:16,24 45:5 46:14 75:6 77:19 121:19 nobody's 175:8 nonviolent 103:4 Nope 81:6 270:11 Normally 241:19 North 2:3 3:7 6:11 NORTHERN 1:1 283:1 nose 86:1 Notary 283:24 note 220:3 noted 219:22 November 1:12 6:7 134:4 282:3 NRC 101:20 number 6:2 112:13 136:23 137:2 143:4 179:10 190:4 216:2 224:9 240:18 243:7 247:6 255:24 264:13 265:15 267:8 270:2	numbers 154:23 155:1 nurse 21:14 nursing 20:14 20:24 21:15 22:1 27:14 <hr/> O O 4:1 281:1,1 oath 229:12 283:9 object 118:14 218:16 253:2 274:11 Object- 228:3 objecting 182:8 274:8 objection 109:8 114:7,19 134:23 135:5 139:15 169:15 174:20,20 182:4 198:3 203:14 214:14 216:7 218:4,23 219:18,22 220:24 221:18 223:9 225:4 226:9 227:3,16 228:12 229:16 237:14,24 239:23 240:11 244:22 245:9 245:10,17 246:3 251:13 252:4 254:7 255:8,19 264:22 265:3 268:12 270:23 objective 169:8 obtain 20:24 21:6 24:2 33:9 obtained 276:9 occasion 31:1 32:12 134:21	135:22 136:5 occasionally 32:9 52:13,17 52:22 occasions 128:15 occur 177:5 occurred 187:3 198:13 227:14 October 118:3,7 offender 103:5 offense 135:17 176:22 177:1 230:14 offer 94:15 95:8 242:7 offered 94:11,11 94:23 95:3 234:6 offhand 21:4 office 7:4 8:24 119:20,23 177:19 271:6 282:2 officer 10:23,23 63:19 64:18 66:13 67:24 68:18,21,23 71:2,24 73:16 73:19,22 74:2 74:5,9,12,15 75:19 78:1,1,7 81:23 82:11,14 82:19,22 83:16 87:21,22 88:2 88:5,12,15,19 92:16,19,22,23 93:8,11,13,16 93:19 94:2 125:20,22 128:9,21 131:15 192:20 198:23 199:2,3 199:6,9 200:6 200:10,19,22	201:14 202:5 203:7 205:18 205:20,21 208:5,23 211:18,22 212:4,5,9,9,10 214:6,10 219:6 219:20 226:21 228:5 237:22 237:22 238:7 238:15,15,22 239:3 245:15 245:20,24 246:10,20,20 247:3,8 248:21 252:21 259:15 262:12 263:13 267:22 officer's 93:2,6 93:13 officers 6:22 7:19 11:14 61:9 63:1,4,8 63:13,15,18,20 64:4,6,8,14,16 65:1 66:9 67:4 67:15,17 68:2 68:6 69:12 72:13,15,18,20 76:11 77:16 78:1,6,9 79:23 80:7 83:14,18 83:23 86:15,17 86:24 87:4,13 108:6 119:12 119:15 121:1,9 126:2 128:16 173:1 191:9 196:24 201:12 205:18 206:15 225:15 246:13 246:16 249:7,8 249:15,20,24 256:9 261:6 275:23	OFFICES 2:5 officially 169:10 169:13 170:6,8 170:9 oh 15:7 21:3 25:23 27:7 28:7 30:12 35:23 52:19,24 53:2 56:18 73:12 84:17 90:3 93:19 107:14 120:19 128:10 133:24 139:12 141:21 142:16 143:3 144:19 159:16 160:4 174:11 175:14 184:4,8 187:8 195:21 213:16 217:7 261:8 277:10 278:11,23 okay 8:3,19,23 9:1,12,18 10:3 10:9,17,20 11:1,8,13 12:3 13:14 14:17 15:7,11 16:9 17:9 19:4,12 21:6,9,16,18 22:7 23:6,9 24:23 25:23 26:18 27:2,8 28:16,23 29:2 29:5,8,15 30:13,19 31:7 31:7 33:14,18 35:12,15 36:9 36:13,16,23 37:5,10,14 38:12 39:1,4,7 39:21 40:8,14 40:18,21 41:5 42:8,15 44:1 44:14,16 45:4
---	--	--	--	---

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 301

45:18,22 47:9	102:17 103:1,6	151:15 152:2	195:8,19,20	242:18,22
47:13,18 48:20	103:14 104:9	152:21 153:22	196:10,14,16	243:1,4,15
49:9,17 50:5	104:19 105:12	154:2,8,21	197:12,16,19	244:3,14,20
50:10,13 51:1	106:10,10	155:9,16,18,21	197:22 198:1,9	245:5,15,23
52:7,11,16,21	107:8,23 108:4	156:3,4,7,22	198:12,15,21	246:10,23
53:5,8,13,18	108:7,13,21	157:17,20	199:4,9,16	247:2,11,19
53:23 54:2,6	109:1 110:4	158:8 159:6,11	200:4,10,19,22	249:9 250:4,17
54:10,14,17,21	111:12 112:4,8	159:14,21	201:2,7,14,17	251:6,10,17,21
55:5,16 56:4	112:11 113:14	160:24 161:5	201:19 202:1,4	252:12,14,20
57:19 58:21	114:17,24	161:10,24	202:9,12,16	253:20,23,24
60:2,5,22	116:13,16	162:12 163:18	203:2,6,11,19	254:11,18,22
61:15,19,21	117:13,17,20	163:22 164:4	204:8,14,20,23	255:1,6,23
62:9,13,16,19	117:22 118:2,5	164:11,14,16	205:7,10,13,23	256:4,9,13
63:1,4,7,10,17	118:12,21,24	165:2,6,8,21	206:8,14,18	257:19 258:13
64:3,11,18,21	119:9 121:3,13	166:1,4,7,12	207:5,8,11,14	258:20,23
65:13,17,22	123:20 124:18	167:8,12,20	208:2,8,17	259:14 260:2,2
66:3,8 67:3	125:22 126:1	168:7,13,21	209:2,6 210:1	260:21,24
68:4,10,18,23	126:10 127:16	169:7,17 170:5	210:10,13,15	261:6,9 262:8
69:3,6,23 70:3	128:11,20	170:12,21,23	211:2,2,7,12	262:12 264:4
70:7,10,14	130:4,8,14,21	171:3,9,9,11	211:15,18	265:14 266:8
71:5 72:3,9,15	130:23 131:2,5	171:20,24	212:5 213:20	266:18,23
74:1,8,11,15	131:10,12,18	172:9,20,24	213:24 216:4	267:4,7 271:2
75:22 76:10,15	131:23 132:3	173:21 175:2	216:15,20	271:14 272:7
76:21 77:1,10	132:16 133:3,9	175:10,16,20	217:7,17,18,23	272:23 275:22
77:18,24 78:11	133:20,24	175:23,24	219:4 220:8,16	276:18,21,24
78:14,21 80:8	135:3,8,15,21	176:1,4,17,21	220:22 221:5	277:4,18 278:1
80:17,22 81:9	135:22 136:4	176:24 177:8	221:13,14,20	278:24 279:18
81:15,18,22	136:10,19	177:13,17	221:24 222:3	279:19
82:3,22 83:4	137:9,15,21	178:8,9,13	222:12 223:4	old 15:2 18:22
83:19 84:17	138:7,9 139:5	179:5,8,10,20	224:13,17,23	34:9 105:21,22
85:2,5,8,12	139:8,13 140:2	179:22 181:8,9	225:15 226:2	107:12 153:13
86:2,14,21	140:11,21	181:11,17,24	227:7,10,14,20	older 152:22
87:11 88:2,11	141:4,7,9,24	182:16 183:1	227:23 229:1,6	276:7,7
88:18,23 90:9	142:7,13,13,13	183:14,17,20	229:12,23	Olive 26:14
91:7,11,23	142:15,16,19	183:24 184:10	230:8 231:7,16	once 65:4 86:14
92:4,7,10,16	142:23 143:10	184:17 185:23	232:6,9 233:4	95:16,16 105:8
92:19,22 93:2	144:4,13,19,23	186:3,12,22	233:15 234:5	186:7,7 278:21
93:10,19 94:5	145:2,6,8,11	187:6,14 188:7	234:11,18	one's 20:4
95:6,10,14,20	145:15,17,22	188:10,24	235:2,4,8,13	ones 10:24 86:19
95:24 96:4,11	146:1,5,9,17	189:9,12,16,24	236:3,7,10,14	86:24
96:15,19,23	146:20 147:17	190:20 191:1,5	236:17,20,24	open 130:1
97:4,12,16,20	148:1,6,11,18	191:18,20,21	237:5,20	149:22 229:14
97:23 98:7,23	149:8,13,20,24	192:2,15,20,24	238:13 239:7	234:23 241:5
99:5,10,22	150:6,10,14,17	193:5,10,17	239:12 240:8	256:15,23
100:6 101:7,21	151:3,6,9,13	194:4,6,19,24	240:15 241:3	opened 181:21

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 302

operation 171:13 174:17 174:23 opportunity 91:9 opt 42:15 option 41:22 42:4 order 253:15,15 269:7 ordered 18:5 Orders 252:15 252:18 ordinance 132:20 organization 169:11,14 170:6,10 outcome 281:22 outlet 120:7 outpatient 51:8 51:10,11,23 52:5 53:11 outright 236:12 outside 18:20 55:2,3,4,11,12 55:20 57:14,24 58:2,10,12,22 59:8,14 62:16 62:20 65:10,15 65:18 66:5,8 67:4 68:5 74:4 111:3 140:10 140:22 144:10 144:14,16 184:20,21,21 184:22 186:24 202:21 215:2 222:22 224:11 225:17,19,23 226:4,7 238:16 238:18,20 239:4 outstanding 192:16,22	Overnight 89:4 owned 25:8 owner 162:1 <hr/> P P 281:1 P.C 2:5,20 p.m 101:14 156:13 262:3 279:23 280:3 page 4:3,16 5:2 5:10 112:9 117:21,24 143:13,15 147:1 paid 18:2 41:6 41:10 47:6,7,7 47:13 49:22 Palles 2:20 4:6 4:10 6:19,19 126:12,16,19 127:1,10,15 135:2,8,9 140:1 142:1,10 142:16,19,22 143:3,8,11,15 143:24 144:4,5 155:14,18 245:5 274:11 274:16,20 275:2,5,10,14 279:1,21 Pamela 14:20,22 15:21 16:23 17:1 30:10 185:19,20 paper 117:6,8 142:5 Paragraph 119:7 pardon 32:15 80:10 85:15 92:12 98:13 109:20 234:20 258:16	Park 20:20 110:22,23,24 111:1 120:22 parking 57:15 57:16,20,23 58:12 parks 106:18 part 22:20 23:20 24:7 29:22 33:14 51:11,23 119:15 169:10 169:13 170:6,9 174:17,23 175:7 232:8 259:12 participate 51:6 52:4 97:8 98:21 104:1 118:12 participated 97:13 259:9 participating 53:11 109:2 particular 24:10 35:5,8 36:17 36:24 37:2,3 39:13 47:22 48:7 52:8 55:18,18,23,24 56:11,12 57:10 60:2,7 62:2 68:7 106:15 129:5 133:11 135:16 168:23 particularly 57:12 parties 132:8 281:21 partner 129:3 129:13,14 179:18 214:11 249:1,2,4 partners 249:10 pass 37:11 passed 247:20	passenger 86:22 Patreon 172:18 Patrick 152:17 patron 172:18 Paukstis 2:2 6:23,23 paukstis@loe... 2:4 pay 18:6 33:12 33:15 41:7 42:3 48:18 paying 61:8 payment 33:14 Payne 216:18 PD 221:6 225:7 225:7 232:4 233:10 236:23 Peanut 45:3 46:17 152:6,8 152:20 Peanut's 152:19 pendency 233:16 pending 8:7 people 32:18,18 34:12,14 36:21 37:19 38:23 40:1,3,4 45:8 49:4,24 52:9 55:19 57:13,16 58:7,10,11,14 58:18 65:6 67:9 73:13 77:8,13 131:14 136:13 140:4 140:13,22 141:1,3 155:20 165:3,21,22 167:16 173:9 174:1 187:1 195:12 199:20 199:20 201:10 201:11 208:13 259:18 273:23 people's 73:3,4	73:8,11 202:8 Perfect 220:4 perfectly 14:15 period 16:21 17:17 19:21 22:12 24:4 26:19 29:13 30:5 36:5,12 37:22 38:1 39:5,18 40:14 43:7 45:24 47:9 48:1 118:5,8 person 36:20 47:14 67:8,20 68:8 72:1 78:18,19 80:5 170:16 172:17 177:22 197:12 204:5,22 205:1 205:2,2,4,5 225:9 274:6 275:17 person's 122:3 personal 242:1 281:13 personal-use 176:7 personally 125:16 178:2 perturbed 115:15 phone 11:5 122:23 123:10 157:21 165:5 phonetic 150:21 151:21 152:17 photographs 11:13,16 142:4 photos 5:11 147:3,8,9,10 147:13,15,19 147:23 physical 99:7,10 99:11,24 100:4
--	---	--	--	--

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 303

103:11 199:4 199:10 200:11 pick 81:9 209:13 209:16 210:3 picked 209:23 273:13 275:23 picture 142:24 145:9,12 148:1 pictures 142:9 144:7,22 148:7 222:17 224:4 piece 190:11 Pig 153:4,5,6,20 pitch 44:11 138:1 172:13 187:24 278:21 pitched 44:10 271:16 pitching 137:24 138:6 165:9 172:23 173:9 174:2 175:12 175:14,15 188:22,24 189:4 195:17 214:11,18,19 214:20,21,24 215:1,1 224:8 PL 117:1 215:15 place 9:24 11:17 21:11 22:1,3 27:16,16 28:1 28:5,21 67:4 81:23 121:11 160:3 179:4 200:20,24 283:8 placed 71:2 72:6 82:4,6,8 83:7,8 198:18 200:22 201:21 202:5 210:13 places 106:15 201:2 plain 63:10	179:17 Plaintiff 4:18 111:23 plaintiffs 2:10 6:24 planning 60:16 plastic 262:19 platform 9:13 play 40:19 playing 99:17 plea 94:9 95:14 96:1 106:7,11 plead 176:21 240:10 please 6:15,17 8:11 23:22 112:17 199:17 207:14 212:6 246:11 254:12 261:13 plugs 127:2 pocket 77:2 82:15,21,23 pockets 72:4 point 8:4,10 18:2 56:24 61:15 62:13 71:14 75:16 76:22 77:24 78:11 80:9,14 80:15 96:7 196:23 207:22 208:18 210:22 223:18 228:23 231:13 232:24 248:8,10 250:5 253:9 269:21 pointing 145:3 police 10:17,20 10:22 11:1,14 40:24 59:9 60:20,23 62:14 62:17,23 65:4 65:6,11,13,19 66:5 67:15	68:6 69:8 79:23 83:24 86:4,11,14,24 87:5,7 108:13 108:14,15,22 109:2,15 119:20 121:9 125:19,22 126:2 144:15 173:1,11,11 174:8 195:12 196:24 198:22 199:6 251:11 252:15,18,21 253:15 portion 53:19 position 70:22 70:23 positive 213:17 possessed 256:7 possessing 256:6 possession 88:24 107:18 110:7 110:18 111:5,9 134:3,11 251:18 255:2 256:11 possibility 189:22 possible 175:19 175:23 193:16 238:17,22 post 53:1 post-conviction 116:7 prefer 117:5 preference 117:10 prelim 177:18 221:8,22 222:1 258:18 preliminary 5:3 177:16,16 211:10,13,16 211:19,23	212:12,16,21 212:22 213:1,5 214:1 215:19 217:2 227:8 preparation 9:16,19 12:10 119:1 prepare 87:9 prepared 116:6 presence 76:13 183:2 265:9,11 present 3:12 7:4 9:2 10:4 12:15 67:15,17,24 68:7,10,13 72:13,15 76:11 77:16 79:24 87:13 88:6 92:7,24 94:1 130:24 140:22 193:2 211:9 228:7,9 243:1 presented 84:23 111:16 116:23 143:23 169:1 215:12 237:8 240:20 264:15 265:23 267:10 270:4 Pretrial 1:4 6:4 283:4 pretty 39:20 41:1 106:22 161:13 171:2 prevents 8:17 previous 128:14 281:6 previously 18:12 32:8 53:13 58:16 59:19 primary 166:1,5 166:9 printed 142:17 prior 18:23 26:2	26:10 27:11 54:15 82:3 118:18,22 128:2 139:3,3 147:7 185:23 186:17 192:17 193:17,23 230:23,23 234:18,21 235:13 239:7 247:4 269:13 276:4,6,19 prison 186:1,4 186:13 189:12 189:15,16,20 254:6 255:7,11 255:13,17 258:2,20 268:20 probable 214:7 probably 28:14 44:5 47:24 59:4 124:11 127:22 164:10 169:5,5 176:19 230:7 246:24 270:12 273:23 probation 98:4 134:5,14,17,18 234:6 236:8,11 problem 143:17 163:16 proceed 237:20 274:23 proceeded 242:22 proceedings 1:4 6:4 116:8 227:1 233:16 257:20,24 258:1 259:8,10 259:13 281:14 283:4 produced 132:9 program 51:5,6
---	--	--	---	--

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 304

51:9,11,23 52:5,8,8,10 53:11 97:14 134:22 270:10 programming 97:9 projects 34:23 34:24 35:2 proper 218:17 prosecution 254:19 provide 30:10 64:21 73:22 provided 53:14 74:2 PTC 21:11 public 90:17 91:8 93:15,18 130:23 131:2 139:20 142:4 147:18,21,22 176:24 177:19 211:3 212:23 213:4,5,6,18 217:19 220:17 221:14,20 283:24 pulled 62:19 65:12 199:19 purchase 33:8 33:19 34:1,4 61:17,23 165:3 196:1 purchased 176:13 purpose 239:12 put 30:15 76:19 81:10 82:16,21 82:23 84:4,4 113:8 140:18 142:11,12,14 143:12 146:23 190:20,21 200:13,16 201:12,18	208:10,11,11 243:6 258:2 264:11 270:16 puts 88:9 <hr/> Q qualify 134:21 quash 130:5 248:2 question 8:6,11 8:13 14:9 25:22 94:19 114:12 135:10 138:10 182:10 184:5 205:23 215:5,6 218:17 219:7,16 220:6 223:3 231:8 237:11 242:15 242:19 250:11 253:8 254:2 256:14 259:15 262:13 275:12 276:2 questioning 274:8,9 questions 7:21 31:3 126:7 153:23 175:18 254:2 260:15 261:18 262:7 263:5 271:6,13 272:23 279:2 279:20 quick 50:11 262:7 265:4 quieter 126:22 quite 58:7 61:24 122:19,20 155:20 189:15 189:20 223:14 230:10 277:17 <hr/> R R 44:20 58:22	89:15,20 90:2 152:2 281:1,1 281:1,1 race 212:11 218:20 ramifications 109:1 ran 69:14 199:20 205:16 276:15 range 229:9 rank 24:2 rap 132:9 razor 157:12 re- 10:22 114:11 137:5 re-question 275:7 reach 248:5 read 219:9 241:3,7,14 256:16 259:17 262:15 266:20 283:6 ready 93:14 real 23:1 65:24 150:19,24 152:18,19 169:18 178:18 186:10 209:18 209:19 262:7 really 17:21 29:14,14,19,20 35:23 37:8 45:10,11 47:3 48:16 53:7 57:11,11 61:7 61:7 64:6 75:10,11,11,24 77:21 98:9 109:11 115:5,5 115:11 120:13 141:15,22,23 145:5 155:8 232:22,23	237:2 reason 56:11 222:17 242:9 244:4 recall 14:15 19:21 32:20 37:20,23,23 40:1 45:4 46:13 49:17 54:10 57:3 58:24 59:3 74:8 77:18 87:6 90:20,24 100:20 102:20 105:13 107:8 107:10,12 111:7 127:24 128:14 129:16 131:15 136:11 137:1 138:13 153:12 191:23 192:19,20,24 193:5 194:6 219:6,19 233:19,20 237:2 240:24 242:12 245:12 247:2,8 248:20 249:3,6 250:4 256:13,24 259:14,22 262:13 263:5 265:14 266:5,5 267:12,17 269:15 270:8 272:11 recalled 247:23 248:1 receive 96:20 received 99:24 receiving 134:4 266:6 recess 50:17 101:12 156:11 262:1	recognize 57:24 58:4 63:12,15 74:23 75:3 92:23 recognized 63:18 75:7 128:11 recollection 199:7 220:1 recommenda... 242:3,6 recommended 236:8 record 6:16 50:16,20 84:20 101:11,15 111:22 117:1 143:13 146:13 150:18 151:17 156:10,14 181:9 200:3 218:9 219:21 241:3 261:24 262:4 280:1 281:13 recounted 191:1 recounting 200:5 recover 262:16 262:18,22 267:15 recovered 264:21 reduced 234:1 281:12 referring 78:6 108:5 153:24 refresh 131:7 219:24 regarding 119:24 120:3,7 222:8 227:23 233:21 247:16 regards 264:1 Reggie 89:18,20
--	---	--	---	---

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 305

152:4	109:11 110:3	246:13,18,19	reside 15:15,21	19:14,23 20:7
regular 27:8	110:11 111:10	247:1 257:4,4	18:9 266:12	55:12 158:12
99:13 108:15	111:10 122:8	257:19,22	resided 19:5	167:13
121:4 122:12	126:5 127:21	264:9 265:10	residence 55:12	Richard 131:6
122:21 123:2,5	127:23 128:3	265:13 270:12	resolution	241:7
194:15 195:2,5	134:2,6,8,8,15	270:15 273:14	176:17	Ridgell 125:20
195:8,14,24	134:16 135:11	273:15 278:2	resolve 231:1	249:24
REITER 3:2	135:13,14	remembers	243:16	right 27:5 31:7
related 11:1	136:9,14	134:24	respiratory	39:19 46:19
104:6 106:7	138:11,16	reminding	164:15	50:10,23 54:12
121:9	139:2,19	155:17	response 66:16	59:24 61:1
relation 79:19	140:15 141:8	REMOTE 2:1	76:5 84:9	62:11 64:24
208:23	150:1 154:10	3:1	91:16 219:8,16	67:11 68:9
relationship	159:24,24	remotely 281:16	241:13 242:18	70:5 80:22,24
128:5 150:7,9	167:1 171:15	rent 25:10 163:1	256:15 259:16	81:17 82:17
relative 281:18	171:18,20,24	repeat 8:12	262:14	85:20 86:2,23
281:19	172:6 177:8,10	98:13 110:16	responses 263:6	101:5 111:2,2
relay 156:21	186:15,20,20	237:10	rest 102:19	111:3,19,22
243:4	187:6 190:17	rephrase 8:12	247:6	117:4,8,14
relayed 233:21	190:19 191:5	report 5:7 10:22	restaurants	119:5 122:10
relaying 222:8	191:13 192:1	reported 3:23	26:14,16	127:13 131:18
remain 65:10	192:12,13,13	281:11	result 81:13,19	132:5,13,14,19
70:21 77:4	192:14 193:8,9	reporter 1:10	85:19 96:16	132:23 133:9
81:4	193:20,21	6:13,17 7:23	99:23 100:3	133:20,24
remained 29:2	194:10,12,23	15:5 263:9	106:10 108:22	134:20 139:9
70:23	196:5,8,12	265:17,18	112:16 114:1,5	140:19 143:14
remaining 63:20	206:3 211:21	281:4 282:9	114:15	144:6,21,21
64:14 72:9	212:1,2,3	reporters 120:6	resulted 134:10	145:1 146:13
remanded	213:4,12,14,24	Reporting 6:14	134:13	146:22 147:2
269:22	216:17,19,20	reports 10:18,20	resulting 132:12	148:9,9,21
remember 21:3	217:6,8,14,15	11:1 251:11,21	results 98:7	151:20 152:6
21:24 22:2	217:17,18,19	251:24 252:2,7	retained 5:2	152:15,15
26:5 27:15,21	217:23 218:2,5	252:10,13,24	return 28:23	153:3,8,10
33:6 38:8 44:6	218:9,14 219:2	267:16	74:5	154:11,11,15
44:20 45:3,7,8	219:15 220:10	represent 7:18	returned 17:12	155:5,12
45:10 46:18	220:12,13	127:17 156:19	28:12,17 29:9	156:21 161:2
49:19 54:20	221:3 222:11	177:1 212:24	74:12,15	161:19,21
58:8 62:1	223:11,16	221:15 271:12	182:16	162:14,19
64:24 65:1	224:2,10,20	representation	review 10:10,12	163:3,16
66:7,7 67:6	226:17 228:5	269:13	10:17,21 11:11	164:17 167:6
68:9 75:8,8	230:4 231:12	represented	11:13,16,19,22	167:14,20
76:14 98:9	232:11,12	177:18 216:18	12:1,3,6,17	168:5,8,9,11
100:23 101:2,4	234:15 235:24	217:20	118:18,21	168:16 169:11
102:23 105:20	236:5,7 237:17	requested 265:5	reviewed 118:24	170:17,19,21
105:21 107:11	244:12 246:6	reserve 279:20	Rhodes 18:10,24	171:1,7 172:1

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 306

172:11,19	273:17 276:21	158:22	215:9 247:3	60:23 61:11
173:12,14	278:1 279:1,21	saw 128:15	scroll 85:5 112:2	69:3 73:9
174:6 176:2	right-handed	138:23 139:1	117:20 119:5	75:10 77:22
180:20 181:19	197:23	183:1 184:1	144:7	85:2,6 91:22
181:22,23	ring 159:9,10	214:11,18	scrolling 247:15	98:4 107:14
182:11,14	ringing 157:21	219:12 222:16	scrutiny 129:2	111:19 112:13
183:11,24	Rio 45:2	223:7 225:16	se 175:3 191:13	112:22 117:11
184:15,16	RMR 3:23 282:8	226:3,18	264:10	117:14 118:2
187:1 189:1,4	rode 173:4	237:22 238:15	seal 282:2	119:7,13
190:1 191:14	role 40:15	251:18 255:14	search 68:23	120:14,21
191:22 192:9	roles 40:6,7,10	256:10 260:3	76:9,16,18	122:17,18,19
194:10,16	40:13,18	261:7	82:11 200:18	123:9,12 125:5
195:3,17	Ronald 2:19 7:9	saying 8:2 73:10	205:19,21	127:1 134:17
196:11,20	156:19 177:22	78:10 133:16	208:1,13	142:15 143:11
197:1,4,7	177:24 178:9	133:17 165:12	searched 66:24	143:16 145:9
198:9,16,18	179:15 191:24	188:17 197:16	67:21 68:3	145:10,11
200:2 201:1,2	223:17 224:19	201:9 202:23	69:2 71:22,24	146:10 171:5,7
201:13 202:11	250:5 268:10	208:14 209:21	76:2,5,19,22	190:18 203:7,9
202:22 203:13	room 9:2 180:4	215:4 220:13	77:6 79:15	203:10 211:15
204:8,9,11,13	180:10,15,16	220:17 223:6	83:2 127:22	214:20,21,24
204:16,21,21	180:22 182:19	225:16 238:14	176:15 208:7	215:16,17,18
205:5 206:12	182:20 234:15	244:5 249:4	208:13	215:23,24
207:11 209:1	235:5	250:18 251:10	searches 88:8	216:2,4,9
210:8 212:11	rooms 136:6	251:22 261:2,4	searching 40:24	219:9 222:21
213:13 214:23	235:5	261:6 268:10	208:6	222:24 224:5,7
215:3,6 216:24	row 38:19,20,21	says 112:13,15	seat 159:23	224:8 225:11
217:16 221:11	187:18 204:6	118:3 119:9	201:7	238:8,9,17,22
223:1 228:11	Royal 6:14	241:5 249:2	second 20:4	239:4,5,14,15
228:16,19	rules 274:18	scene 59:9 60:20	76:23 77:6	240:22 247:8
230:23 235:18	run 65:8 199:21	62:14 65:4	83:1,3 91:5,7	247:12,16,19
236:15,16,18	276:12,12,19	128:12	107:9,13 112:9	247:22 250:4
243:2 246:19	running 65:7	school 20:14,17	131:11 134:21	264:17 266:2,8
247:17 248:9	73:3,3,8,11	20:19,23 21:10	171:10 186:22	267:18 270:6
248:14,15,17	140:5	23:2 27:18	187:15,16	275:3,5,9
250:24 251:1,5		Scot 3:12 6:9	202:23 221:12	276:12
256:23 257:14	S	Scott 154:4,6,7	seconds 201:20	seeing 220:14
257:17 258:2,5	S 2:20 4:1,15 5:1	154:12	201:23	seek 99:22
258:7,11,15,18	sale 149:3	screen 9:9,13	security 40:20	100:12,16
258:21,24	sales 36:24	84:18 85:3	40:21,23 41:3	103:14,19
259:1 260:22	48:12,13	111:20 117:6	42:18 44:10	seen 59:6 63:21
261:3 262:6	SASSI 51:7	117:11,15	46:12 152:8,9	63:22 115:23
264:5,6,8,9,20	sat 136:5 201:8	142:11,14	152:10 172:11	115:24 120:19
265:2 267:18	201:10 203:6	266:3	172:23,24	120:22 128:18
268:9,21 270:1	256:1	screen-share	271:16	147:3,5,7,8,8
270:19,22	Saturday	143:6,7,9	see 45:2 49:21	162:18 176:14

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 307

226:21 262:9 segregation 100:7,8 seized 266:21 self-employed 24:24 25:3 self-employ... 27:3 sell 34:22 35:3,9 35:15,16,18 36:16 38:20,22 39:2,7,10,11 39:14 40:5,15 42:24 43:4,7 44:12,14 46:21 50:5,8 56:6 90:12 137:22 141:17,18,20 163:24 164:4 164:12,19 165:18,19,23 167:23 168:12 169:3 175:8 193:14 195:12 225:23 279:9 279:12 seller 36:20 selling 34:15,19 34:20 35:1,22 41:3 44:13 45:13 47:10,14 49:4,4 53:18 56:9,12,19,23 61:21 109:18 109:21 163:9 164:18 166:8 166:13 174:2 175:7,11,12 176:2 189:6 190:13 255:14 257:13 send 53:19 54:3 sent 53:23 142:3 259:12 264:20 269:4 270:12	sentence 129:18 130:12,15,19 229:8,23 230:2 240:9 242:4 266:18 269:23 separate 59:5 259:20 September 234:8 270:9 sergeant 63:19 67:14,24 68:5 71:14 80:6 81:24 119:16 128:19 129:1,2 129:12 179:23 183:1 184:1,18 184:19 185:24 186:5,14,18,23 187:15,19 189:3,13 190:13,18 191:2,6 192:3 192:10 193:2,5 197:23 202:10 203:12,20 205:14 206:1 206:19 207:8 208:22 209:2 211:12,15 220:18 223:7 225:2,8 226:8 226:18,19,24 227:7,20 231:17 250:9 250:14,15,18 250:20 251:2 251:11,17,22 252:2,23 253:18 254:5 254:18 255:1 259:8 263:18 268:3 serve 102:13 225:18,19,22 served 226:7	serving 103:9 138:6 226:4 set 53:24 133:12 218:2 237:8 279:15 282:1 sets 69:20 seven 18:22 69:12 77:7,14 105:1,2 185:8 185:8,10 274:20,21,22 275:18,24 sex 218:21 shady 129:13,15 shake 164:16 share 142:8,11 143:19 240:16 she'll 138:5,6 sheet 132:9 shit 79:6 207:2,3 209:4 shop 25:20 159:21 160:20 162:1 167:17 Shoplifting 106:2 short 44:19 46:18 58:6,17 179:2 180:12 180:18,23 181:2,5,5 182:6,17,21,22 182:24 183:3,6 183:12,18,21 186:10 231:2 Shorthand 1:9 281:4 282:9 shortly 134:9 135:3 Shorty 32:24 33:9,12,15,20 34:2 36:5,13 36:16,23 37:10 37:15,16,22 38:7,9,16 39:2	39:18 41:6 45:6,8 171:10 171:13,21 Shorty's 169:11 Shots 4:17 shoulder 200:16 200:19,21,24 201:3 show 84:13,18 111:12 116:20 144:22 247:14 267:4 275:2 showing 266:3 sic 215:15 216:17 224:18 249:14 262:24 side 15:6 69:21 80:23,23 81:15 81:17 144:17 149:7 196:20 207:11 sign 253:16 signature 112:8 117:23 252:24 279:20 signed 10:24 12:4 118:11 252:7,9 signified 174:1 signing 118:19 similar 121:16 Sing 46:9,11 single 218:6 sir 8:5,11,23 9:9 11:20 13:2,22 14:3 16:1 17:3 17:20 20:5,12 21:7 22:15 24:19 26:10,20 27:4,9 28:6,10 29:3,13 30:5 31:10,17,21 32:3,13 34:7 34:11 35:10 40:12 43:19	51:2 65:8 81:2 85:6 89:5 105:2 111:4,19 112:2 117:21 129:24 135:10 147:2 163:6 167:15 185:6 190:10 sit 85:24 86:1 254:12,14 sitting 70:16 210:19 213:24 situation 55:24 113:6,18 115:4 115:15 six 52:19 69:12 69:22 70:10 102:1 116:4 185:8 skin 246:14 skinny 64:7 slap 79:11 81:20 209:3,20 slapped 79:10 80:17,20,22 81:5,13 85:19 197:17,19 slaps 207:8 slightest 109:17 smacked 207:4 210:14 small 124:10 125:12 143:16 154:14 smaller 132:21 smart 238:23 Smoke 122:4 123:4,5,7,18 123:20 125:6 154:12 Smoking 59:13 snitch 108:2,12 108:18,21 109:16 Snort 32:2
--	---	--	---	--

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 308

snorting 195:6	118:7 136:16	spend 100:7	248:6 266:19	232:16
sold 30:6 35:13	139:8 144:6	spent 100:7	268:3 281:5	steps 140:7
35:24 37:12,21	146:2 153:22	spoke 59:4	State's 119:23	204:21 256:20
38:24 39:1,9	169:9 182:8,9	123:16 128:5	213:20,22	stick 142:6
39:15 42:21	184:4 188:14	spoken 119:22	217:23 240:5	stiffer 129:18
43:11 44:1,23	189:18,18	120:2,6 125:6	241:17	130:15
45:1 46:6,20	248:16 254:13	sport 248:19	stated 214:7,11	stood 76:18 79:4
48:21 50:3	272:17 276:21	271:3	217:13 250:20	79:17 207:24
58:18 120:11	278:12	spouse's 14:18	255:2	208:11
120:16 141:21	sort 106:5	14:20	statement	stop 31:14 45:13
149:24 150:3	sought 113:24	spread 208:12	119:19 229:14	45:15 51:2
164:7,11 165:2	231:9	spring 187:12	states 1:1 252:2	122:24 174:2,3
165:8,20	Soul 49:23	187:13	262:24 283:1	stopped 23:16
178:20 193:19	sound 8:14	squad 275:21	stating 129:17	34:9 50:22
278:23	132:12	St 110:21,23,24	224:2 254:20	123:1
solid 270:21	sounds 132:14	111:1	263:13	storefront
some- 31:15	source 166:2,5	stairs 69:21	station 83:24	165:16
somebody 48:4	166:10	140:4 145:16	84:12 86:5,11	story 220:17
116:13 168:18	South 2:7 3:3	145:24 146:3	86:15,19,20	222:7 223:6
175:13,15,15	18:10,23 19:14	148:2 202:19	87:5,7 88:19	strategy 218:11
181:21 238:17	19:23 20:7	255:15	193:6,9 210:12	street 2:16,21
239:5 271:22	55:12	stairwell 148:4,7	275:21	3:7 6:11 20:8
somebody's	Spaargaren	stand 75:17,20	status 235:16	35:4,6,7 165:7
145:3	3:10 7:7	78:16,23	stay 28:13 66:4	273:19
Sometime-	space 270:14	standing 58:1	102:7 136:20	streets 149:9
35:16	speak 66:10,11	67:11 68:16	136:22 160:6,6	165:11 272:19
Somewhat	91:9 120:14,23	70:15 140:19	161:17	strike 16:3 33:7
54:16	123:13,17,21	144:14,16	stayed 17:22	46:20 53:9
son 15:12,14	179:22	208:2 215:2	65:18,20 97:20	55:6,9 70:14
16:7,14 18:3	speaking 55:6	256:17	102:9 136:21	72:10 94:8,20
104:19	55:11 149:21	stands 257:12	136:24 199:22	94:20 102:12
soon 143:17	272:3,7	257:16	staying 178:15	110:20 118:6
sorry 9:24 11:8	Special 252:18	start 6:2 25:12	179:3	strip 88:9
15:7,24 17:23	specialist 6:10	31:9 34:15	stems 115:9	strips 87:22
19:16 20:15	specific 164:24	121:22 163:4,5	stenographica...	struck 198:1
27:2 33:3,18	169:2 171:17	started 25:6,10	281:11	stuff 50:1 84:4
36:9 40:11	193:20 199:3	34:19 56:23	Step 44:19 58:5	87:24 88:9
41:24 43:22	specifically 39:2	65:7 77:8	58:17 59:15	97:3 131:13
51:19,21 54:19	79:18 130:8	160:16 162:15	61:4,16 65:20	159:19 231:17
67:22 71:11	131:15 191:14	163:9,14,15,24	65:20,24 66:4	submit 135:4
72:23,24 74:23	191:19 194:20	starts 142:21	232:15	subscribe 283:9
80:15 81:23	196:8 218:10	143:18,18	Stephanie 66:1	SUBSCRIBED
82:19 94:22	220:12	state 1:10 86:7	66:1,4 68:10	283:19
103:23 106:21	specified 281:17	108:13 219:18	69:3 89:5	subsequent
108:9 110:22	speed 248:17	239:9 245:6	138:23 139:1	114:6,18

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 309

131:21 subsequently 140:18 188:3 substance 97:8 97:13 134:3 214:6 219:19 substance-abu... 104:2 Substances 250:21 266:22 suburb 111:2 sufficiency 224:14 sug- 131:6 suggest 131:5 suit 132:7,7 Suite 2:7,12,16 2:21 3:3,7 6:11 sum 104:6 summer 17:22 184:8 187:13 support 18:3,6 30:15 116:7 supporting 30:4 supposedly 181:24 260:23 suppress 92:2,4 92:20 93:3,20 227:10 236:4 239:8 243:13 243:17,20 245:16 256:2,5 263:6 suppressed 232:2 suppression 94:3 95:1 130:5 135:23 sure 11:5,6 25:21 61:24 87:23 98:14 114:14 121:20 127:11 141:23 230:10 277:17 surmise 195:2	suspect 262:21 swear 6:18 switch 50:12 sworn 7:10,13 281:8 283:19 symptoms 96:21 <hr/> T T 4:1,15 5:1 281:1,1,1 table 95:17 tactical 128:17 192:3,11 take 8:1,5,7 9:23 23:19 33:22 35:24 42:9,13 42:16 48:2 50:11 56:15 72:1,3 76:21 82:14 97:5 98:4 101:6 106:7 112:3 117:5 127:3 130:11 155:23 156:2,3,5 164:1 212:14 212:14 224:4 231:15 234:5 248:5 261:20 261:21,22 278:11,12 take-home 41:17 168:5 taken 1:8 69:4,6 69:23 81:24 82:3 87:8 140:12,16,17 145:17 147:20 148:7 281:15 talk 66:19 75:2 122:14,23 123:10 124:2,3 124:10,18 125:2,12 129:4 154:14,17	171:10 175:22 180:2 196:14 211:7 235:8,10 235:12,15 237:3 239:19 240:15 243:24 245:6 250:24 261:17 talked 55:3 84:1 110:2 124:12 124:14,15 180:11 182:9 231:14,14 244:2 talking 55:21,22 55:24 56:1,2 59:14 61:6 68:15,17 75:24 76:1 127:17 128:4 133:21 135:7 153:18 153:23 155:6 167:6 182:18 195:20 216:23 217:1 223:17 272:1,6 tapers 157:10 TASC 97:23 98:4,10,14 234:5 236:1,8 244:21 tattoo 148:19 team 38:23,23 47:21 119:11 119:16 128:17 175:8 191:17 192:4,11 199:2 259:12 teenager 23:1 163:19 telephone 122:14 tell 14:16 38:15 75:14 78:2 87:16 88:18	91:11 93:23 96:8 105:12,15 127:18 135:17 140:3,8,11,12 176:9 194:13 194:21 203:17 204:4 211:3 220:16,22 221:5 222:7 223:5 224:17 226:6 231:16 231:21 232:5,9 233:7,10,11 236:20 239:3 244:14 260:19 telling 55:8 136:11,14 138:11 139:20 139:20 140:16 192:7 200:7 221:3 224:3,10 224:21 tells 71:15 78:21 ten 17:2 26:23 35:11,11 70:24 72:9,11 74:20 89:8 180:24 181:2 206:3,6 206:7 262:19 ten-year 26:19 territory 149:8 test- 245:15 testified 7:13 18:12 32:8 53:14 55:10 59:19 92:22 94:2 168:3 202:12 206:14 211:18,23 227:23 229:6 229:13 245:16 246:1 256:9 258:17 266:11 271:15 testify 8:21	92:10,13,16,20 93:20 211:12 227:7,20 251:17 281:8 testifying 8:17 220:10 testimony 144:13 148:13 203:15 214:2,4 219:20 225:5 229:12,17 237:7 247:2,16 248:20 256:24 262:13 281:14 thank 15:14 23:24 71:13 101:8 126:8,10 254:16 271:7 279:22 thanks 155:16 155:16 279:21 thing 23:15 47:1 60:24 106:13 125:18 200:5 202:4 206:18 206:21 218:6 224:1,2 226:20 226:23 232:5 things 14:15 125:2,3 172:9 172:21 196:4 231:24 think 10:15 12:12,13 14:11 21:21 23:11 25:4 28:20 30:14,21 31:11 31:15 51:7 54:12 59:1,3 59:23 60:14 62:21 63:6 66:2 67:19,22 68:14,14 69:13 73:7,20 81:17 90:22 92:18,21
---	---	--	---	---

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 310

93:8,9,11 94:6	three 26:8 31:22	65:3 70:8	223:12 230:21	tone 246:14
98:17 101:23	37:19 42:5,8	72:16 75:10,16	233:13 239:15	Tony 136:13,15
102:1,5,9,18	42:16 49:4,13	76:22,23 77:6	241:9 248:18	136:17,19,21
103:23 104:10	72:20 80:7	77:17,24 78:11	248:24 250:20	137:9,16,21
104:10,10	94:12,15,23	80:9,15 82:12	253:17,21	138:14
105:1,10,23	95:17 97:7	83:1,2,3 88:21	255:4 258:11	top 112:12
106:24,24	159:2 202:18	89:6,19 90:24	261:23 262:2	134:18 266:9
107:1,3,15	202:24 203:8	91:2,3,4,5,7	268:21 273:15	topic 125:4
110:5 120:20	219:12 222:21	93:4 94:2,12	276:19 279:23	tore 45:17,20
124:4 126:4	225:12,16	96:5,7 97:21	281:16 283:8	total 63:4
127:6,22	226:18 231:15	99:1,4 100:6,7	times 9:18 32:7	touch 127:19
128:23 131:8,9	231:18 237:23	100:8,8 101:9	35:19 128:8	137:7
131:9 132:15	238:9,10 239:6	101:13 102:19	133:4,11	town 123:7,9
133:23,23	244:2 250:19	103:6 104:4	135:23 186:3	townhouse 19:9
136:24 140:8	251:3,7 259:20	105:9,11,12,16	189:17,21	19:10
141:21,22,23	260:3 261:20	106:4 107:5,7	190:1,4 223:14	trade 167:24
146:23 149:17	three-transact...	107:13 110:14	257:12	172:10 174:7
150:8,10 153:2	237:9	110:17 111:11	today 6:13 8:17	175:6 277:22
156:8,20	throw 155:1	116:2 118:5,8	8:21 9:19	traffic 158:19
160:14 161:14	throwing 154:24	119:9 120:17	12:11 32:10	Train 49:23
174:15 176:11	Thursday	120:24 125:5	93:7 115:9,22	trans- 226:18
176:12,19	158:22	126:9 128:7	118:22 119:2	transaction
178:5 179:13	ties 166:21	130:9,24	137:7 222:8	238:23
186:6 194:23	tight-knit 45:9	131:19,23	223:6 229:13	transactions
199:7 211:14	Till 274:21	132:5 133:5,7	235:19,23	219:14 222:22
212:3,15,17	time 6:7 9:21	136:1 137:23	257:14	225:12,16
213:2,22	12:9 16:21	138:14,14	today's 143:4	226:19,22
227:22 232:13	17:17 19:16,21	139:6 144:15	told 36:10 75:1	231:18 237:23
232:18,20,21	22:12 23:3,9	148:4 149:10	75:19 76:15,17	238:9,10 239:6
235:6,6 236:2	23:14 24:4,18	155:15 156:9	76:18 79:11,22	251:7 260:5
236:9,23	26:23 28:13	156:12 160:2,4	87:19 88:1,15	transcript 5:3,4
239:16 245:21	29:8,16 30:2,5	162:7 164:7	93:16,17	215:19 247:7,9
246:7 250:11	30:19 33:6	169:1 171:12	123:24 129:17	281:11 283:7
267:5 270:15	34:6,8 36:4	174:12,16	129:20 130:1	283:10
271:21 272:18	37:22 38:1,6	175:4,10 177:3	139:13 140:15	transcripts
273:14,19	39:5,18,23	177:21,24	140:17 206:10	11:11
276:3,3,3,4,6,6	40:14 43:7	178:3 179:2	208:1 209:4	transferred
277:8	44:21 47:9,15	180:8,12 184:1	218:4 219:19	90:14 98:19
thinking 142:1	48:1,9 50:14	184:17,19	220:21 222:13	100:21 101:2
155:5	50:18 52:17	185:14 190:7	222:15,16	101:18 102:3,6
third 82:11	53:7,7 54:10	192:2,6,8,9	224:21,24	translate 163:9
thought 23:14	55:16,17 56:17	193:18,24	225:7,7 230:17	181:9
94:12 108:11	56:20,24 57:3	199:24 201:20	231:8,10,19,19	transport 86:4
109:16 128:24	59:23 60:9	203:19 210:15	231:20 233:10	transported
232:23	61:8,15 62:14	219:10 222:12	238:5	83:23 84:12

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 311

89:3 Traveler 22:21 Traveling 22:23 23:3,7,10,13 23:17 24:5,7 148:15,21 treatment 96:20 98:12,16,21 99:23 100:13 100:16 103:15 103:19 104:2 113:24 134:22 135:4 244:15 244:17,18 245:1,2,3 trial 129:18 130:16,17 229:8,15,20 230:16,21 231:2 241:22 242:8 274:24 trials 130:11 trick 14:14 217:15 tried 231:4 270:16 trouble 27:18 true 47:1 119:2 132:23 214:10 224:23 225:1 236:14 245:23 263:18 281:13 283:9 Trust 260:11 truth 281:8 truthfully 8:17 8:21 try 8:11 126:20 139:17 142:8,8 143:19 162:21 175:18,22 190:21 233:24 234:2 235:20 240:8 248:17 265:4	trying 14:14,14 29:18,19 67:8 99:18 153:14 162:6,7,8,10 188:17 195:22 217:15 232:1,1 232:7 243:19 Tuesday 158:24 turn 11:4 126:24 137:24 138:5 208:8,17 turned 95:8 208:14 TV 55:1 Tweak 150:1,3,7 150:10 151:6,8 twice 9:20 52:3 79:15 128:10 186:8 twins 246:21 two 15:1 19:15 19:17,18 48:8 49:3,12 62:21 62:21 63:2,5 63:16,17 64:13 69:20,20,20 80:7 83:18 102:10 108:20 110:1 128:5 136:13 159:2 177:7 186:19 202:18,24 203:8 204:21 250:19 251:3 275:12 two-year 29:13 type 30:22 56:6 96:20 98:11,15 99:22 106:13 150:9 types 50:2 typewriting 281:12 typically 42:15 50:5 56:20	U Uh-huh 42:7 207:16,19 241:2 Uh-uh 169:12 ultimately 62:13 74:5 83:7 91:24 92:1 94:9 95:11,20 95:22 98:19 100:21 102:11 102:13,15 Um 184:3 186:2 215:3 unable 96:16 uncles 19:18 20:1 uncles' 20:2 understand 8:8 8:9,10,13 213:8 215:4 238:13 239:1 242:11 understanding 147:19 understood 67:23 242:19 uniform 63:8 UNITED 1:1 283:1 unmarked 62:23,24 173:3 unreportable 188:12 213:9 217:11 222:10 260:13 unsuccessful 62:10 upstairs 69:14 use 30:22 31:18 31:20 32:6 34:11,12 52:23 53:4,7 60:3 89:12 90:9	96:17 137:19 142:9 179:1 195:22 274:21 user 137:17 278:19 V vacated 104:7 Valentino 274:1 274:3 varies 158:21 167:1,4 various 47:10,11 121:9 vehicle 65:14 83:10,13,15,17 86:15 vehicles 62:22 62:23 63:2 verbatim 93:23 Vice 22:21,23 23:4,7,10,13 23:17 24:5,7 148:15,21 video 6:2,10,10 videoconference 1:11 7:14 Videographer 3:12 6:1 23:21 23:24 50:14,18 101:9,13 156:9 156:12 254:11 254:16 261:23 262:2 279:23 videotaped 1:7 Vienna 101:23 101:24 102:4 view 85:6 Vincennes 37:7 39:3 violated 250:21 violations 132:21 266:21 visible 81:18 visit 139:3,6	visited 138:21 139:7,7,10,21 visiting 136:13 136:15 138:13 138:16 139:21 vividly 257:5 VL 170:21 voice 7:24 volume 126:24 voluntarily 52:4 W Wacker 3:3 wait 269:16 waited 269:19 waiting 74:20 wake 56:17,20 wake-up 41:16 168:4 walk 57:7,19 65:14 256:21 walked 65:11 66:20 71:17,18 71:21 181:18 240:5 walking 55:14 55:14 walks 201:3 wall 70:19,20 71:3 72:12 77:23 140:18 201:15,18,22 204:1,3 205:8 206:5,9 207:6 207:22 208:9,9 208:12 210:21 wander 171:4 want 19:24 41:19 70:23 91:17 112:5 117:8 121:18 126:13 127:11 142:9,10,10 143:1,2,6 144:7 155:12
--	--	--	--	--

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 312

155:23 156:1,5 160:12,13 162:20 164:10 164:23 184:8 231:15 234:3 236:10 244:8 260:11 261:11 261:13 274:17 274:19 wanted 29:20 56:14 98:4,4 170:13 179:1 234:4,7 236:11 244:5 248:5,8 248:11 wants 196:1 220:9 warrant 192:22 193:7 205:17 warrants 73:4,9 77:12 192:16 205:16 wasn't 17:17 23:19 29:14 30:2 35:23 36:1,19,19 47:19 53:23 55:17,23 57:11 60:7 61:2,3,7 61:10,12,20 62:12 64:12 68:13 69:5 75:24 82:17 98:24 99:3,3 103:6 109:3 140:9,9 151:1 162:22 165:9 168:23 169:6 170:15 174:19 174:23 175:8 187:12,17 192:8 195:16 196:21 199:3 209:4 215:1 216:11,11	222:19 224:11 224:22 231:20 232:13 258:22 275:20,20 278:4 waste 264:12 watched 54:24 watching 40:23 187:20,21,23 188:5,19,20 214:1,4 Watson 66:1,4 68:10 69:4 89:5,10,13 115:21 116:3 232:16 Watts 1:3 2:19 5:2 6:4 7:9 63:19 66:14 67:14,24 68:5 71:4,15 72:19 75:21,22 76:4 76:12,15 78:8 78:16,21 79:5 79:22 80:6,17 81:24 119:11 128:19 129:1,2 156:20 177:23 178:1,1,9,19 179:15,23 181:3,12 182:13 183:1,8 183:14 184:1 184:18,20 185:24 186:5 186:14,18,23 187:15,19 189:3,13 190:13,18 191:2,6,24 192:3 193:2,5 197:23 202:10 203:12,20 205:14,19,21 206:1,19 207:8	208:22 209:2 211:12,15 215:11,14 220:18 223:7 223:17 224:19 225:2,8 226:8 226:18,20,24 227:7,20 231:17 240:18 240:19 247:5 250:6,9,14,15 250:18,20 251:2,11,17,22 252:3 253:18 254:5,18 255:1 255:23 259:9 263:18 264:13 264:14 265:15 265:22 267:8,9 268:3,10 270:1 270:3 283:3 Watts' 119:16 192:11 252:24 way 33:22 41:8 105:17 123:6 145:8 148:3 175:22,23 180:17 184:4 185:18 222:18 222:21,23 223:2 224:5,7 224:7 226:21 239:3,6 Wayne 162:2 166:21 ways 59:5 we'll 84:14 91:22 111:13 116:21 215:14 219:4 240:17 we're 11:4 50:15 50:20 101:10 101:15 143:13 156:10,14 197:4 216:23	235:19 240:17 254:2 261:21 261:22,23 262:7 279:20 280:1 we've 12:18 127:16 153:18 weapons 87:23 wear 85:14 wearing 127:1 197:4 Webb 14:20 Wednesday 159:1 week 12:12 32:7 35:20 48:2 52:3 53:24 159:3 162:8,11 166:16,23 167:22 weekend 158:22 167:4 weekends 159:5 weekly 35:22 52:22 weeks 97:7 167:2,3 weight 246:14 Wells 20:9 34:24 35:2 36:17 37:1,9 38:17 38:19 39:12 43:1 48:14,22 89:24 120:12 121:11 131:14 144:11 149:15 149:21 150:4 171:4 178:5,16 179:6 went 20:13 28:7 28:7 48:13 54:23,24 56:5 59:4 61:1,11 61:11,16,22 64:1 67:1	87:12 91:6,7 95:22 99:20 101:23,23 129:18 130:11 130:15,17 136:4 139:2 162:18 176:19 180:10,10,14 180:22 183:12 189:22 223:12 223:13,13 230:16 235:24 255:13,17 268:20 269:7 275:21 Wentworth 86:8 86:9,10 weren't 35:1 36:4,5 56:8,12 133:4 169:10 169:13 170:5,9 171:3 175:12 175:13 187:17 202:19 243:1 257:13 258:20 West 2:11,12,16 2:21 4:5,11 6:21,21 7:16 7:18 9:8 11:6,9 14:12 15:13 24:1 26:1 31:8 50:21 71:12 84:15,18,20 85:1 101:8,16 109:14 111:18 111:22 112:1 114:13,23 117:1,10,12 118:17 143:5 143:10 144:3 148:13 149:7 153:24 168:3 182:5 217:13 279:3,6,18 West's 264:11
---	--	--	---	---

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 313

Western 149:12	220:11 221:2	225:10 238:20	Y	137:12,13,23
WHEREOF	223:10 225:6	worked 22:11	yeah 12:13 17:6	137:24 138:8
282:1	225:20,21	26:2,4,12,13	19:5 20:16	138:18,20,21
whisper 250:8	226:10,13,16	26:16 27:13,23	22:6 28:21	138:21,22,24
250:13	227:4,17 228:4	28:20,22 33:13	30:14 31:15	139:7,8,17
white 28:20,22	228:13 229:18	36:7,7 39:4,22	32:11,12 33:10	141:3,11,11,16
153:15,17,20	232:24 237:15	40:2,15,19,20	33:24 35:14	141:16 142:22
153:24 157:15	238:1 240:1,12	44:7,9,9,10,17	36:7 37:4	143:15 144:3
192:20 212:15	240:20 244:23	44:17 45:5,6	38:18,22,24	144:20,20
212:16,17,20	245:11,19	46:11,15,15	39:15,20,20	146:4 147:8
213:2,23	246:5 251:14	47:5 48:6 49:7	40:17 41:14	148:17 149:19
216:16 262:20	252:5 253:4,7	129:1 152:10	42:17 43:12,21	151:5,12,19,22
wholesale	254:9,13,15	161:16 170:13	43:24 44:19	151:23 152:10
195:20	255:9,20	171:13,18	45:2,2 46:17	152:14 153:13
wide 256:22	261:10,13,16	172:3,23,24	48:23 49:19,19	153:17 154:16
wife 30:9 185:14	263:10 264:15	271:16 272:21	50:4 54:20	154:20 155:22
277:12	264:23 265:23	working 25:7	56:13 58:20	156:6 160:13
wife's 185:17	267:10 268:13	29:6 30:3	59:7 60:12	160:14 162:10
Wilbourn 274:1	270:4 271:1,7	33:15 36:5,14	61:18,18 62:5	162:21 163:17
274:3	274:5 281:7,7	37:14,15,24	62:11 63:22	163:21,21
William 12:23	282:1	39:17,21 40:21	67:6,16 68:12	167:7 168:1,9
willing 234:5	witnesses	40:23 41:3	70:9 73:18	170:1,20 171:2
Wiper 49:22	232:10,13	42:22 43:10,13	75:5 76:3	171:7 173:20
wire 197:9	woke 56:14 60:3	48:8 49:9 56:9	78:13 80:19,19	173:20 174:5
withdraw 184:5	woman 90:21	61:3,20 171:20	81:11,14 84:1	174:19 175:14
231:8	women 64:16	171:24 172:6	85:18,23 86:9	175:15,17
withdrawal	won 258:17	180:5,6 188:21	86:9 88:6 91:2	176:23 182:2
96:15,21	wonderful	232:3 248:24	91:18 93:11	183:23,23
witness 1:8 4:3	126:10	249:14,23	95:7 96:3	184:14 185:22
6:18 7:3,10,12	word 195:23	worries 11:10	98:17,18 100:5	186:2 187:2,11
9:6 11:7 14:7	words 223:17	worry 215:7	100:23,23	189:2,14,14,14
14:10 15:4,7	250:5	wouldn't 37:2	102:5 105:10	189:21,23
15:10 23:23	work 21:13,18	169:5	106:12 107:7	190:10 193:1
25:23 31:4,7	21:22 24:20,22	wow 21:3	111:1 114:22	193:12 194:3,3
71:10 84:24	26:6,11 27:24	wrap 267:5	114:22 115:14	194:5 195:4,7
109:10 111:17	28:19 36:6,11	Wright 137:14	116:9,9 122:13	195:18 196:3
114:10,21	36:22 41:2	137:15	122:13 123:6	196:22 197:21
116:24 117:11	42:18 44:3,8	wrist 200:13	123:11,16	200:9 202:3
127:7,9,14	45:18,22 46:5	wrong 149:16	125:8 126:14	203:1 204:17
139:16,18	46:8,10 47:3	wrongfully	127:10,14	204:17 205:20
143:23 155:16	47:16 48:4,17	112:20,24	128:13 129:20	206:7 207:7,10
155:19 174:22	49:10 56:16		130:3 131:1,8	208:19,21
198:6 203:16	106:5,11		132:14 133:19	209:8,9,9
214:15 215:12	118:15 170:14	X	134:1,7,8	210:4,4,24,24
216:8 219:1	172:10 191:10	X 4:1,15 5:1		211:1,5,5

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 314

212:22,22	116:4 130:22	1	126 4:6	240:18,19
213:8,19 214:5	134:19 164:6	1 1:12 4:17 5:3	134 6:11	247:6 255:24
215:23 216:13	166:8 186:19	5:11 6:2,7	13th 136:11	2- 29:1
220:21,21	192:14 229:21	50:15 84:14,23	14 4:19 111:24	2:00 54:12
221:9 223:22	230:13 231:15	96:14 97:20	1400 6:11	20 27:7,7 60:15
224:16 226:5	244:2 273:16	112:13 143:4	143 5:11	126:12 157:17
228:9 230:1,10	yell 127:13	143:22 215:11	15 58:14 60:14	192:14
230:10,11	yep 123:19	215:14	95:19 130:22	20- 31:15
231:13,19	151:19 154:9	1:00 57:23	140:4 141:3	200 2:7 162:11
232:8 234:3	162:11 168:6	1:37 156:9	158:7,8 167:10	167:2,21
236:19 238:2,2	170:20,22	1:54 156:13	167:11 173:18	2000 3:7 16:12
238:19 240:23	189:5	10 16:15 31:24	173:23 229:21	17:6,6,6 23:11
243:8 244:13	Yesterday 9:22	41:20 54:7,22	229:21 230:13	133:22 134:4
252:11,13	Yohler 1:9 3:23	56:4,8,24	264:5	146:14 148:16
254:10,14	6:14 281:3	57:20 58:14	15-month	163:12 174:14
257:2,6 258:3	282:8	89:21 91:13	134:14	193:10
258:6,19 259:7	young 23:1	92:24 114:5	150 167:3	2000- 14:8
259:11 260:17	27:17 125:23	115:10 126:3	156 4:7	2000s 174:17
260:23 261:4,8	152:24 178:4	141:3 198:24	1600 2:21	176:1,6
264:7 268:8	178:16 199:23	199:11 205:9	17 30:21	2001 14:11,19
270:18,20	237:22 238:15	264:5 266:20	1717 6:5	17:8,9 28:11
273:7,10,14	245:24 246:10	10:04 1:12 6:8	17th 282:3	28:12 178:6,8
275:5,10	246:20 247:3	100 273:23	18 102:15	179:20,23
277:13,14,15	248:22 255:14	10th 128:8	103:10 134:5	184:6 185:13
277:17,24	256:13 263:13	193:11,18,23	163:21,23	186:5
278:6,23	264:21 267:21	199:5	273:16	2001/2002 183:2
year 15:8 16:12	Young's 262:13	11 16:15 218:20	19 6:5 31:11	184:2
17:3,23 20:21	younger 153:2	11:05 50:14	34:8 59:23	2002 28:24 29:3
22:5 28:2,14		11:17 50:19	269:9	29:9 133:23
28:15,15,16	Z	111 4:20	19-cv-01717 1:3	161:16,22
51:15 53:8,10	Ziarko 3:12 6:9	116 4:21	283:3	178:8 179:20
96:3,3 102:18	Ziploc 262:20	12 20:13,13	1985 22:24 23:1	179:24 184:6
105:14,18,20	Zoom 6:7 7:5	89:21 118:3	148:15	185:13 186:5
107:8,10,11	9:13	132:11 173:19	1986 20:22	2003 17:16,17
111:11 134:4	0	173:23 205:11	1989 16:13	18:1 44:2
171:17 177:6	01 184:12 185:3	206:10,12	1993 21:22	45:19 46:22
184:23 269:8	02 162:9 184:12	12"s 173:18	22:10	134:10 135:3
years 16:15 17:2	185:3	12/14/93 15:12	1994 22:10	161:15,16,22
18:22 21:18	020079 142:21	12:00-ish 55:2	1998 35:12	187:4,7 191:2
26:23 33:19	03 185:1	12:17 101:9	1st 179:11,12	191:6,22
34:3,8 35:11	04 167:6,8	12:27 101:14	2	2003/2002 33:23
35:11 36:10	173:19 190:22	12:30 57:23	2 4:18 5:4 50:19	2003/2004 43:9
52:19 89:8,21	196:6 234:8	12:30/1:00 57:5	101:10 111:14	44:3 46:1
94:12,16,23		120 3:7	111:16 178:6	2004 11:2 19:24
96:2 115:24				20:1 29:5,10

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 315

44:2 54:7,22	34:9 50:23	3:37 261:23	280:3	575 43:6 45:23
56:5,8 57:1,20	52:11 53:1	3:46 262:3	40 41:12 42:14	46:6,16,21
89:7,20 90:7	59:24	30 105:23 164:6	402 91:21 92:2	179:9 184:15
91:13 92:24	2016 111:4,6	166:8 201:23	233:22 236:15	
98:24 99:6	2017 118:3,7	30- 15:3	236:17,20,22	6
100:9,14,18	2018 104:10,12	30,000 104:14	236:24 239:9	6 5:8 270:2,3
103:3,17,21	269:9,11	104:15	239:10,13,18	6:30 56:21
113:23 114:5	2019 132:8	300 167:5	239:21 240:4,8	60602 3:8
114:15 115:10	2020 4:19	307 136:20	241:10,14	60603 2:17,21
119:24 120:3,7	111:24	30s 107:14	242:20,23	60604 2:7,12
126:3 131:19	2022 1:12 6:7	31 228:1 240:15	243:11,24	60606 3:3
131:24 138:15	282:3 283:20	311 2:3 3:3	247:17,20	60607 2:3
160:21,23	203 179:13	312.243.5900	45 59:10,11	60653 18:11
161:3,6,8,11	21 159:17,19	2:4		61 176:20
161:13 166:22	215 5:3	312.341.9646	5	186:11
191:7,23 192:4	2165 117:2	2:13	5 5:7 262:3	65 262:24
192:17,22	2168 117:2	312.372.0770	267:8,9 279:24	263:15 264:1,5
193:7,11,13,18	22000 146:2	2:17	5- 39:15	264:20 266:16
193:23 194:11	23 270:9	312.422.9999	50 41:12 42:14	266:21 268:6
194:22 198:24	23rd 234:8	2:22	511 136:22	6th 136:24
199:5,11 211:8	240 5:4	312.427.3200	51606 84:21	
218:20 219:5	24th 12:13,15	2:8	51st 86:6,6,8	7
266:20 270:9	25 27:7 158:1,2	312.982.0090	5200 3:3	7 4:5 192:22
277:16	158:6,8	3:4	527 277:8,22	7:00 56:23
2005 25:4,5 26:2	250 162:8 163:4	31st 227:14	279:10,16	7th 137:1
26:10 33:21	25th 12:13,15	32 105:23	53 2:12	
135:24 136:12	264 5:5	33 2:16 132:11	540 11:17 43:6,6	8
138:12 227:15	265 5:6	337 2:12	43:8,11 44:2,8	84 4:17
228:1 240:16	267 5:7	35th 35:6,7,7	44:18 45:14,19	84-4531 1:10
268:17	27 119:7	160:8,8,10,11	47:6 54:8 56:5	3:24 282:10
2005/2006 25:14	270 5:8	160:14	57:1,4,7,10,24	866.786.3705
2006 20:1 23:11	2700 2:16	3610 18:10,23	58:13 59:9	3:8
23:11	271 4:8	19:14,23 20:7	60:6,19 61:16	
20079 143:19	273 4:9	55:12 158:12	61:22 62:4,20	9
2008/2009 35:13	275 4:10	167:13,17	65:11,15,18	9 132:12
20084 146:2	279 4:11	38th 37:6 39:3	66:5,9 67:5	9/18/68 13:1
20085 146:14	27th 211:7 219:5	39th 35:6,7 37:6	68:6,19 69:1,7	9:30/10:00
20086 146:15	2nd 179:12	3rd 2:3 140:4	69:18,19,24	56:18
201 2:7			87:14 90:6	90- 21:20
2010 164:10,10	3	4	136:20 140:23	90s 163:7,12
164:11,19	3 4:21 5:5	4 5:6 95:18	144:10 201:21	92 17:5,6,8
165:4,8 166:2	101:14 116:21	156:13 229:21	545 141:22,23	93 21:20,20
20102 215:15	116:23 156:10	265:20,22	55 2:21	94 21:20
20114 243:9	264:13,14	4/11/89 15:11	574 39:15 42:19	98 34:18
2015 31:15,16	265:19,20,20	4:03 279:23	42:22 47:2	99 34:18 163:12

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Harvey Blair - Taken 11/1/2022

Page 316

99/'98 34:17
9th 193:13 194:2
194:7,9,11,12
194:21 196:6,8