

# Exhibit 17



Transcript of the Deposition of  
**Harvey Blair**

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

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

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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.

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<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.</p> <p>6        This deposition is being held via 7        Zoom meetings on November 1, 2022. The time is 8        now approximately 10:04 a.m.</p> <p>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.</p> <p>13      The court reporter today is Michelle 14      Yohler, who is with Royal Reporting.</p> <p>15      Will counsel please identify 16      yourselves for the record.</p> <p>17      And will the court reporter please 18      swear in the witness.</p> <p>19      MR. PALLE: Eric Palles for Kallatt 20      Mohammed.</p> <p>21      MS. WEST: Allyson West on behalf of the 22      individual defendant officers.</p> <p>23      MS. PAUKSTIS: Elizabeth Paukstis on behalf 24      of Loevy &amp; Loevy, plaintiffs.</p>	<p>1        could hear you and she can take down everything 2        you're saying, that would be great.</p> <p>3        A. Okay.</p> <p>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.</p> <p>8        Do you understand?</p> <p>9        A. I do. I understand.</p> <p>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.</p> <p>14      Does that sound fair?</p> <p>15      A. That's fair.</p> <p>16      Q. Mr. Blair, is there anything that 17      prevents you from testifying truthfully today?</p> <p>18      A. No.</p> <p>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?</p> <p>22      A. No.</p> <p>23      Q. Okay. Sir, where are you located?</p> <p>24      A. I'm located at my lawyer's office.</p>
<p style="text-align: center;">Page 7</p> <p>1        MS. HARRIS: Dhaviella Harris on behalf of 2        the City.</p> <p>3        MR. FLAXMAN: Joel Flaxman for the witness. 4        Collin Gill from my office is also present on 5        Zoom.</p> <p>6        MS. McGRATH: Megan McGrath for defendants 7        Cadman and Spaargaren.</p> <p>8        MR. KOSOKO: Ahmed Kosoko on behalf of 9        Ronald Watts.</p> <p>10      (WHEREUPON, the witness was duly sworn.)</p> <p>11      HARVEY BLAIR, 12      called as a witness herein, having been first 13      duly sworn, was examined and testified via 14      videoconference as follows:</p> <p>15      EXAMINATION</p> <p>16      BY MS. WEST:</p> <p>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.</p> <p>23      But like the court reporter just 24      said, if you could keep your voice up so that we</p>	<p style="text-align: center;">Page 9</p> <p>1        Q. Okay. Other than Mr. Flaxman, is 2        there anyone present in the room with you?</p> <p>3        A. Yes, Collin.</p> <p>4        Q. Mr. Gill?</p> <p>5        MR. FLAXMAN: Yes.</p> <p>6        BY THE WITNESS:</p> <p>7        A. Yes.</p> <p>8        BY MS. WEST:</p> <p>9        Q. And, sir, is there a computer screen 10      up in front of you?</p> <p>11      A. Yes.</p> <p>12      Q. Okay. Is there anything on that 13      screen other than the Zoom platform?</p> <p>14      A. No.</p> <p>15      Q. Mr. Blair, did you meet with your 16      counsel in preparation for your deposition?</p> <p>17      A. Yes.</p> <p>18      Q. Okay. How many times did you meet 19      with your attorney in preparation for today?</p> <p>20      A. Twice.</p> <p>21      Q. When was the most recent time?</p> <p>22      A. Yesterday.</p> <p>23      Q. How long did that meeting take 24      place -- or, I'm sorry.</p>

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

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<p>1       A. Yes.</p> <p>2       <b>Q. And did that marriage end in divorce,</b></p> <p>3       <b>sir?</b></p> <p>4       A. Yes.</p> <p>5       <b>Q. When were you divorced?</b></p> <p>6       MR. FLAXMAN: Don't look at me. Answer --</p> <p>7       BY THE WITNESS:</p> <p>8       A. 2000--</p> <p>9       MR. FLAXMAN: -- the question.</p> <p>10      BY THE WITNESS:</p> <p>11      A. 2001, I think.</p> <p>12      BY MS. WEST:</p> <p>13      <b>Q. And, Mr. Blair, just so you know, I'm</b></p> <p>14      <b>not trying -- trying to trick you on any of</b></p> <p>15      <b>these things. So if you don't recall, perfectly</b></p> <p>16      <b>fine to tell me that.</b></p> <p>17      A. Okay.</p> <p>18      <b>Q. What was your spouse's name that you</b></p> <p>19      <b>were divorced from in approximately 2001?</b></p> <p>20      A. My spouse's name is Pamela Webb.</p> <p>21      <b>Q. Did you have any children with</b></p> <p>22      <b>Pamela?</b></p> <p>23      A. Yes, I do.</p> <p>24      <b>Q. How many children?</b></p>	<p>1       <b>something, sir?</b></p> <p>2       A. No, no, I didn't.</p> <p>3       <b>Q. Have you ever -- strike that.</b></p> <p>4       <b>Do you have any other children?</b></p> <p>5       A. No.</p> <p>6       <b>Q. Have you ever lived in the same</b></p> <p>7       <b>household with your daughter and your son?</b></p> <p>8       A. Yes.</p> <p>9       <b>Q. Okay. When did you live with your</b></p> <p>10      <b>children?</b></p> <p>11      A. I lived with them when they were</p> <p>12      first born up until the year 2000.</p> <p>13      <b>Q. So if your daughter was born in 1989,</b></p> <p>14      <b>you lived with both your daughter and your son</b></p> <p>15      <b>for approximately 10 or 11 years; is that</b></p> <p>16      <b>correct?</b></p> <p>17      A. Yes.</p> <p>18      <b>Q. And when you lived with them, where</b></p> <p>19      <b>did you live?</b></p> <p>20      A. We lived in Minneapolis, Minnesota.</p> <p>21      <b>Q. During the time period in which you</b></p> <p>22      <b>lived with your children, did you also live with</b></p> <p>23      <b>Pamela?</b></p> <p>24      A. Yes.</p>
<p style="text-align: center;">Page 15</p> <p>1       A. Two.</p> <p>2       <b>Q. And how old are your children?</b></p> <p>3       A. 30 -- one of them is...</p> <p>4       THE WITNESS: (Inaudible.)</p> <p>5       MS. REPORTER: Mr. Blair, when you lean to</p> <p>6       the side, I can't hear you.</p> <p>7       THE WITNESS: Oh, okay. I'm sorry.</p> <p>8       MR. FLAXMAN: You have to give the year</p> <p>9       first.</p> <p>10      BY THE WITNESS:</p> <p>11      A. Okay. My daughter was born 4/11/89,</p> <p>12      and my son was born 12/14/93.</p> <p>13      BY MS. WEST:</p> <p>14      <b>Q. Thank you. Do both your son and</b></p> <p>15      <b>daughter reside in the Chicagoland area?</b></p> <p>16      A. No.</p> <p>17      <b>Q. Where do they live?</b></p> <p>18      A. They live in Minneapolis.</p> <p>19      <b>Q. Both of them?</b></p> <p>20      A. Yes.</p> <p>21      <b>Q. Does Pamela reside in Minneapolis as</b></p> <p>22      <b>well?</b></p> <p>23      A. Yes, she does.</p> <p>24      <b>Q. Have you -- I'm sorry. Did you say</b></p>	<p style="text-align: center;">Page 17</p> <p>1       <b>Q. How long were you married to Pamela?</b></p> <p>2       A. Approximately ten years.</p> <p>3       <b>Q. What year, sir, did you live in</b></p> <p>4       <b>Minneapolis?</b></p> <p>5       A. I lived in Minneapolis from '92 until</p> <p>6       2000 -- 2000. Yeah, from, like, '92 to 2000.</p> <p>7       And then we got back together for a little</p> <p>8       while. So maybe from '92 to, like, 2001.</p> <p>9       <b>Q. Okay. And in 2001, did you move back</b></p> <p>10      <b>to Chicago?</b></p> <p>11      A. Yes.</p> <p>12      <b>Q. When you returned to Chicago, did</b></p> <p>13      <b>your children ever live with you again?</b></p> <p>14      A. For a little while --</p> <p>15      <b>Q. When was this?</b></p> <p>16      A. Maybe, like, 2003. Maybe, like,</p> <p>17      2003. But it wasn't for a long period of time.</p> <p>18      It was just for, like, a few months.</p> <p>19      <b>Q. And why did they come live with you</b></p> <p>20      <b>for only a few months, sir?</b></p> <p>21      A. Actually, they just -- they really</p> <p>22      came because they stayed with me for the summer.</p> <p>23      <b>Q. And I'm sorry. What year did you say</b></p> <p>24      <b>that was?</b></p>

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

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<p style="text-align: center;">Page 22</p> <p>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.</p> <p>4 <b>Q. And you were at that job for about a 5 year?</b></p> <p>6 A. Yeah.</p> <p>7 <b>Q. Okay. And why did you leave that 8 job?</b></p> <p>9 A. Because we were moving to Minnesota.</p> <p>10 <b>Q. Other than from 1993 to 1994, 11 approximately, have you ever worked as a CNA any 12 other time period?</b></p> <p>13 A. No.</p> <p>14 <b>Q. Do you hold any other certificates or 15 higher degrees, sir?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Mr. Blair, have you ever been in a 18 gang?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. What gang were you a part of?</b></p> <p>21 A. A Traveler Vice Lord.</p> <p>22 <b>Q. And when did you become a member of 23 the Traveling Vice Lords?</b></p> <p>24 A. Maybe 1985, somewhere like that.</p>	<p style="text-align: center;">Page 24</p> <p>1 BY MS. WEST:</p> <p>2 <b>Q. Did you ever obtain a rank?</b></p> <p>3 A. No.</p> <p>4 <b>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?</b></p> <p>9 A. No.</p> <p>10 <b>Q. Was there a particular gang in the 11 area in which you lived?</b></p> <p>12 A. Yes.</p> <p>13 <b>Q. And what gang was that?</b></p> <p>14 A. The Gangster Disciples.</p> <p>15 <b>Q. Mr. Blair, are you currently 16 employed?</b></p> <p>17 A. No.</p> <p>18 <b>Q. When was the last time you were 19 employed, sir?</b></p> <p>20 A. Actually, I -- I work for myself. I'm a -- I -- I'm a barber. I cut hair, so I work for myself.</p> <p>21 <b>Q. Okay. So you're currently 22 self-employed?</b></p>
<p style="text-align: center;">Page 23</p> <p>1 About 1985 when I was a teenager, real young.</p> <p>2 <b>Q. Were you still in high school at the 3 time that you became a member of the Traveling 4 Vice Lords?</b></p> <p>5 A. Yes.</p> <p>6 <b>Q. Okay. And are you still affiliated 7 with the Traveling Vice Lords?</b></p> <p>8 A. No.</p> <p>9 <b>Q. Okay. When was the last time you 10 were affiliated with the Traveling Vice Lords?</b></p> <p>11 A. 2000, maybe -- 2006. 2006, I think.</p> <p>12 <b>Q. And, Mr. Blair, why did you become a 13 member of the Traveling Vice Lords?</b></p> <p>14 A. Well, at the time, I thought it was just a cool thing to do.</p> <p>15 <b>Q. And when you stopped affiliating with 16 the Traveling Vice Lords, why was that?</b></p> <p>17 A. I was -- because I became a -- I had to take care of my family, and that wasn't a part of my life anymore.</p> <p>18 THE VIDEOGRAPHER: Mr. Blair, can you keep 19 yourself centered, please.</p> <p>20 THE WITNESS: Yes.</p> <p>21 THE VIDEOGRAPHER: Thank you.</p>	<p style="text-align: center;">Page 25</p> <p>1 A. Yes.</p> <p>2 <b>Q. And how long have you been 3 self-employed?</b></p> <p>4 A. Maybe 2005, I think, somewhere around 5 there, something like that. Like, 2005, I 6 started cutting hair.</p> <p>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.</p> <p>12 <b>Q. And when did you start cutting hair 13 out of your house?</b></p> <p>14 A. Between 2005/2006, somewhere up in 15 there.</p> <p>16 <b>Q. And since then, have you continued to 17 cut hair out of your house, or did you -- 18 have --</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. -- you gone back to a shop?</b></p> <p>21 MR. FLAXMAN: Make sure you let her finish 22 the question.</p> <p>23 THE WITNESS: Oh, okay.</p>

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

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

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

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

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

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<p style="text-align: right;">Page 46</p> <p>1      <b>Q. Around 2003/2004?</b>    2      A. Mm-hm.    3      <b>Q. Is that a yes?</b>    4      A. Yes.    5      <b>Q. And did you work for anybody when you sold out of the 575 building?</b>    6      A. Yes.    7      <b>Q. Who did you work for?</b>    8      A. This guy named Sing.    9      <b>Q. And in what capacity did you work when you worked for Sing?</b>    10     A. I was head of security.    11     <b>Q. Do you recall the names of -- names or nicknames of any of the individuals you worked with when you worked out of the 575 Building?</b>    12     A. Yeah, it was me, Peanut, sometimes Short Body, Mario. That's all I can remember right now.    13     <b>Q. And when you sold -- strike that. Did you sell out of the 575 Building on and off from approximately 2003 until the buildings came down?</b>    14     A. Yes.</p>	<p style="text-align: right;">Page 48</p> <p>1      with him for a period of time or, you know -- or one day, he might -- or he might take a week or something off or -- and you'll have to find somebody else to work for.    2      So that's how -- that's how that worked out.    3      <b>Q. Was there ever a particular day that you were working for two different individuals at the same time?</b>    4      A. No.    5      <b>Q. Were there certain individuals that controlled a building and the sales, the drug sales, that went on in that building in the Ida B. Wells complex?</b>    6      A. I don't -- I -- I can't give you an answer on that because I really don't know. You know, I don't know how they -- how they work. They -- you know, that was above my pay grade. I don't know.    7      <b>Q. Okay. And were different drug lines sold out of different buildings in the Ida B. Wells complex?</b>    8      A. Yeah, absolutely.    9      <b>Q. And what does that mean? What does a</b></p>
<p style="text-align: right;">Page 47</p> <p>1      <b>Q. Is the same thing true for the 574 Building?</b>    2      A. Kind of, but I didn't really work in that building. I just -- only sometimes.    3      <b>Q. And when you worked out of the 540 Building for Baker, how would you get paid?</b>    4      A. We got paid in narcotics and got paid in cash.    5      <b>Q. Okay. So during this time period, are you selling at various different buildings for various different individuals?</b>    6      A. Yes.    7      <b>Q. Okay. So are you getting paid by every person that you're selling for at the same time?</b>    8      A. It all depends on who you work for that day.    9      <b>Q. Okay.</b>    10     A. But, I mean, it wasn't like, you know -- it all -- it depended on who you -- you know, who team you was on on that -- for that particular day. You know, unless you all had a -- unless you and the other individual had a good camaraderie, you know, you'd probably mess</p>	<p style="text-align: right;">Page 49</p> <p>1      <b>drug line mean?</b>    2      A. Like, you know, a drug line means that you might -- you might have, like, two or three people selling -- selling drugs out of the same -- out of the same building, you know.    3      But, like -- like, for instance, if you worked for B-Lo, B-Lo might say this individual -- another individual might be working that -- it was okay for another individual to work in -- out of the same building.    4      So that would be, like, maybe two or three lines in the same building.    5      <b>Q. And did the drug lines have different names?</b>    6      A. Of course.    7      <b>Q. Okay. And what -- do you recall any of the names of the drug lines?</b>    8      A. Yeah, I -- yeah. I -- I can remember some of the names, not all of them.    9      Let me see. You had like lines named Paid in Full, Ass Wiper. I don't know, they had all -- all kind of crazy names. Soul Train.    10     It was -- you know, people like to</p>

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<p style="text-align: center;">Page 50</p> <p>1 call their stuff different names, I guess.  2     <b>Q. And were different types of drugs</b>  3     <b>sold out of different buildings?</b>  4     A. Mm-hm. Yeah.  5     <b>Q. Okay. Did you typically always sell</b>  6     <b>heroin?</b>  7     A. Yes.  8     <b>Q. Did you ever sell crack?</b>  9     A. Yes.  10    <b>Q. Okay. All right, Mr. Blair. Let's</b>  11    <b>take a quick five-minute break here before we</b>  12    <b>switch gears.</b>  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    <b>Q. Mr. Blair, you stopped using heroin</b>  23    <b>in 2015; is that right?</b>  24    A. Yes.</p>	<p style="text-align: center;">Page 52</p> <p>1     <b>Q. How often would you attend meetings?</b>  2     A. You had to -- you had to come to a  3     meeting twice a week.  4     <b>Q. And did you voluntarily participate</b>  5     <b>in this outpatient program?</b>  6     A. Yes.  7     <b>Q. Okay. How did you hear about this</b>  8     <b>program, this particular program?</b>  9     A. From other people that was on the  10    program.  11    <b>Q. Okay. And since 2015, you have not</b>  12    <b>used heroin?</b>  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    <b>Q. Okay. And when you say</b>  17    <b>"occasionally," when was the last time you used</b>  18    <b>heroin?</b>  19    A. Oh, maybe about five or six years  20    ago.  21    <b>Q. Okay. And, again, when you say</b>  22    <b>occasionally, would it be weekly, monthly? How</b>  23    <b>often would you use it? This is --</b>  24    A. Oh --</p>
<p style="text-align: center;">Page 51</p> <p>1     <b>Q. Okay. And did you -- how did you</b>  2     <b>stop using heroin, sir?</b>  3     A. You said how did I?  4     <b>Q. Yes.</b>  5     A. I got into a program.  6     <b>Q. What program did you participate in?</b>  7     A. I think it was called SASSI.  8     <b>Q. Was it an inpatient or an outpatient</b>  9     <b>program?</b>  10    A. Outpatient.  11    <b>Q. As a part of the outpatient program,</b>  12    <b>what did you have to do?</b>  13    A. You -- they -- you drink methadone.  14    <b>Q. And how long did you drink methadone?</b>  15    A. Maybe about a -- maybe about a year  16    and a half.  17    <b>Q. Did you --</b>  18    A. (Indiscernible.)  19    <b>Q. I'm sorry. Go ahead.</b>  20    A. Never mind. Go ahead. Go ahead.  21    I'm sorry.  22    <b>Q. No. Did you have to attend any</b>  23    <b>meetings as a part of the outpatient program?</b>  24    A. Of course.</p>	<p style="text-align: center;">Page 53</p> <p>1     <b>Q. -- post 2015.</b>  2     A. Oh, this -- it was -- like, maybe if  3     I didn't make it to -- to drink methadone, I  4     would use.  5     <b>Q. Okay. So --</b>  6     A. So, I mean, that would be, like, the  7     only time that I would really use at that time.  8     <b>Q. Okay. And was that about a year</b>  9     <b>following -- strike that.</b>  10    <b>That was during that year that you</b>  11    <b>were participating in the outpatient program?</b>  12    A. Yes.  13    <b>Q. Okay. Now, previously, Mr. Blair,</b>  14    <b>you testified that you provided money or</b>  15    <b>financial assistance for your children while</b>  16    <b>they were growing up, correct?</b>  17    A. Yes.  18    <b>Q. Okay. And when you were selling</b>  19    <b>drugs, would you send a portion of the money</b>  20    <b>that you made to your children?</b>  21    A. Yes, if -- if they needed something,  22    yes.  23    <b>Q. Okay. So it wasn't like you sent a</b>  24    <b>set amount of money every week or every month?</b></p>

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

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

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

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

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

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<p style="text-align: right;">Page 74</p> <p>1       <b>Q. Okay. Well, what happened after you</b>    2       <b>provided the officer with an ID?</b></p> <p>3       A. I gave him my ID, and he -- he took    4       it outside to the car.</p> <p>5       <b>Q. And did the officer ultimately return</b>    6       <b>to the hallway where you were?</b></p> <p>7       A. Yes.</p> <p>8       <b>Q. Okay. And you don't recall which</b>    9       <b>officer that was?</b></p> <p>10      A. No.</p> <p>11      <b>Q. Okay. What happened when that</b>    12      <b>officer returned with your ID?</b></p> <p>13      A. He gave -- well, whoever ID that he    14      had, he gave them back to us.</p> <p>15      <b>Q. Okay. So that officer returned your</b>    16      <b>ID to you, correct?</b></p> <p>17      A. Mm-hm. Yes.</p> <p>18      <b>Q. Did you have any conversation with</b>    19      <b>the individuals that were lined up in the</b>    20      <b>hallway with you while you were waiting that ten</b>    21      <b>minutes?</b></p> <p>22      A. No.</p> <p>23      <b>Q. Did you recognize -- I'm sorry. Go</b>    24      <b>ahead.</b></p>	<p style="text-align: right;">Page 76</p> <p>1       was talking to Mohammed, and he was -- he asked    2       Mohammed had he searched me. And Mohammed said    3       yeah.</p> <p>4       <b>Q. And did Watts say anything in</b>    5       <b>response to Mohammed confirming he had searched</b>    6       <b>you?</b></p> <p>7       A. Yes.</p> <p>8       <b>Q. What did he say?</b></p> <p>9       A. He said: Search him again.</p> <p>10      <b>Q. Okay. Were any other -- any of the</b>    11      <b>other officers present for that conversation</b>    12      <b>that Watts and Mohammed had with each other in</b>    13      <b>your presence?</b></p> <p>14      A. I don't remember.</p> <p>15      <b>Q. Okay. What happened after Watts told</b>    16      <b>Mohammed to search you again?</b></p> <p>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.</p> <p>21      <b>Q. Okay. Did Mohammed take anything off</b>    22      <b>you at that point in time when he searched you</b>    23      <b>for the second time?</b></p> <p>24      A. No.</p>
<p style="text-align: right;">Page 75</p> <p>1       A. No, they told us not to -- not to    2       talk.</p> <p>3       <b>Q. Did you recognize any of those other</b>    4       <b>individuals that were in the hallway with you?</b></p> <p>5       A. A few -- a couple of them, I -- yeah.</p> <p>6       <b>Q. What were the names or nicknames of</b>    7       <b>those individuals you recognized?</b></p> <p>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.</p> <p>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.</p> <p>16      <b>Q. At some point in time, were you</b>    17      <b>allowed to stand up?</b></p> <p>18      A. Yes.</p> <p>19      <b>Q. What officer told you or allowed you</b>    20      <b>to stand up?</b></p> <p>21      A. Watts.</p> <p>22      <b>Q. Okay. What did Watts say to you?</b></p> <p>23      A. He -- well, he -- he asked my -- he    24      didn't -- he wasn't really talking to me, but he</p>	<p style="text-align: right;">Page 77</p> <p>1       <b>Q. Okay. You still had the cash in your</b>    2       <b>pocket?</b></p> <p>3       A. Yes.</p> <p>4       <b>Q. How much longer did you remain on</b>    5       <b>your knees in the hallway after Mohammed</b>    6       <b>searched you a second time?</b></p> <p>7       A. Maybe, about, like, five to seven    8       minutes because then they started letting people    9       go.</p> <p>10      <b>Q. Okay. And --</b></p> <p>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.</p> <p>14      <b>Q. During that five to seven minutes,</b>    15      <b>did you have any conversation with any of the</b>    16      <b>officers that were present?</b></p> <p>17      A. Not at that time, no.</p> <p>18      <b>Q. Okay. Do you recall the names or</b>    19      <b>nicknames of the individuals that they were</b>    20      <b>letting go?</b></p> <p>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.</p> <p>24      <b>Q. Okay. At some point in time, did an</b></p>

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

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

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<p>1 know, sit on my nose.</p> <p>2 <b>Q. Okay. All right. That's all I have</b></p> <p>3 <b>for you with that one.</b></p> <p>4 <b>Where did the police transport you,</b></p> <p>5 <b>what station?</b></p> <p>6 A. 51st and -- 51st and, what is that,</p> <p>7 State -- Federal.</p> <p>8 <b>Q. 51st and Wentworth?</b></p> <p>9 A. Yeah, Wentworth. Yeah, that's it,</p> <p>10 Wentworth. Mm-hm.</p> <p>11 <b>Q. Had you been to that police station</b></p> <p>12 <b>before that date?</b></p> <p>13 A. Yes, I been there before.</p> <p>14 <b>Q. Okay. Once you arrived at the police</b></p> <p>15 <b>station, did the officers who drove the vehicle</b></p> <p>16 <b>escort you in?</b></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 <b>Q. Okay. So the driver and the</b></p> <p>22 <b>passenger --</b></p> <p>23 A. Right.</p> <p>24 <b>Q. -- police officers are the ones that</b></p>	<p>1 being charged with, and he told me.</p> <p>2 <b>Q. Okay. Is that an officer that you</b></p> <p>3 <b>encountered in -- while you were going into</b></p> <p>4 <b>lockup?</b></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 <b>Q. Okay. Do you know the name of that</b></p> <p>12 <b>officer?</b></p> <p>13 A. No.</p> <p>14 <b>Q. And what did you -- did you say</b></p> <p>15 <b>anything to the officer when they told you what</b></p> <p>16 <b>you were being charged with?</b></p> <p>17 A. No.</p> <p>18 <b>Q. Okay. You didn't tell anyone in</b></p> <p>19 <b>lockup or any officer at the station that you</b></p> <p>20 <b>didn't have any drugs on you?</b></p> <p>21 A. No, not -- no, I didn't at that time,</p> <p>22 no.</p> <p>23 <b>Q. Okay. And you were being charged</b></p> <p>24 <b>with possession?</b></p>
<p style="text-align: center;">Page 87</p> <p>1 <b>escorted you into the building?</b></p> <p>2 A. Yes, ma'am.</p> <p>3 <b>Q. Did you have any additional</b></p> <p>4 <b>conversation with those officers as you were</b></p> <p>5 <b>being escorted into the police station?</b></p> <p>6 A. No, not that I recall.</p> <p>7 <b>Q. When you got to the police station,</b></p> <p>8 <b>where were you taken?</b></p> <p>9 A. Where they -- where they prepare you</p> <p>10 for lockup.</p> <p>11 <b>Q. Okay. Did you have -- before you</b></p> <p>12 <b>went to lockup, did you have any conversation</b></p> <p>13 <b>with any of the officers that were present at</b></p> <p>14 <b>the 540 Building?</b></p> <p>15 A. No.</p> <p>16 <b>Q. Did anyone ever tell you what you</b></p> <p>17 <b>were being charged with?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Who told you what you were being</b></p> <p>20 <b>charged with?</b></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: center;">Page 89</p> <p>1 A. Yes.</p> <p>2 <b>Q. How long were you in lockup before</b></p> <p>3 <b>you were transported to Cook County Jail?</b></p> <p>4 A. Overnight.</p> <p>5 <b>Q. Sir, Stephanie Watson, how long had</b></p> <p>6 <b>you known her at the time of your arrest in July</b></p> <p>7 <b>of 2004?</b></p> <p>8 A. Maybe ten years.</p> <p>9 <b>Q. How did you first come to know</b></p> <p>10 <b>Ms. Watson? Did she live in the area?</b></p> <p>11 A. Yes.</p> <p>12 <b>Q. And did you ever use drugs with</b></p> <p>13 <b>Ms. Watson?</b></p> <p>14 A. Yes.</p> <p>15 <b>Q. And Double R, do you know that</b></p> <p>16 <b>individual's government name?</b></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 <b>Q. And at the time of your arrest in</b></p> <p>20 <b>2004, how long had you known Double R or Reggie?</b></p> <p>21 A. Maybe about 10 or 12 years, something</p> <p>22 like that.</p> <p>23 <b>Q. And did he -- did he live in the</b></p> <p>24 <b>Ida B. Wells complex?</b></p>

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

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

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

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

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

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

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<p style="text-align: right;">Page 114</p> <p>1      <b>result of those feelings?</b></p> <p>2      A. No, no, I didn't -- no, no, I -- no,</p> <p>3      I didn't.</p> <p>4      <b>Q. Are you claiming any mental health</b></p> <p>5      <b>injuries as a result of your July 10, 2004</b></p> <p>6      <b>arrest and subsequent incarceration?</b></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     <b>Q. Sure. Are you claiming any mental</b></p> <p>15     <b>injuries as a result of your July 2004 arrest</b></p> <p>16     <b>and --</b></p> <p>17     A. Okay.</p> <p>18     <b>Q. -- subsequent incarceration?</b></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     <b>Q. Okay. What are you claiming?</b></p>	<p style="text-align: right;">Page 116</p> <p>1      matter of fact.</p> <p>2      <b>Q. When was the last time you had</b></p> <p>3      <b>contact with Ms. Watson?</b></p> <p>4      A. Maybe about six years ago, something</p> <p>5      like that.</p> <p>6      <b>Q. Are you aware that she prepared an</b></p> <p>7      <b>affidavit in support of your post-conviction</b></p> <p>8      <b>proceedings?</b></p> <p>9      A. Yeah. Yes, I -- yeah, I'm aware of</p> <p>10     it.</p> <p>11     <b>Q. Did you ask her to do that?</b></p> <p>12     A. No, I didn't.</p> <p>13     <b>Q. Okay. Do you know if somebody did</b></p> <p>14     <b>ask her to do that?</b></p> <p>15     A. Yes.</p> <p>16     <b>Q. Okay. Who asked her to do that?</b></p> <p>17     A. I believe, my lawyer.</p> <p>18     <b>Q. Mr. Flaxman?</b></p> <p>19     A. Yes.</p> <p>20     <b>Q. Mr. Blair, I'm going to show you what</b></p> <p>21     <b>we'll mark as Individual Defendants' Exhibit 3.</b></p> <p>22     <b>(WHEREUPON, Individual Defendants'</b></p> <p>23     <b>Exhibit No. 3 was presented to the</b></p> <p>24     <b>witness.)</b></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      <b>Q. And do you still feel any anger or</b></p> <p>9      <b>frustration today that stems from being arrested</b></p> <p>10     <b>on July 10, 2004?</b></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     <b>Q. Mr. Blair, I forgot to ask you this</b></p> <p>20     <b>earlier.</b></p> <p>21     <b>Ms. Watson, do you still have contact</b></p> <p>22     <b>with her today?</b></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     <b>Q. Okay. That's good.</b></p> <p>14     <b>All right, Mr. Blair, can you see a</b></p> <p>15     <b>document on your screen now?</b></p> <p>16     A. Yes.</p> <p>17     <b>Q. Okay. Are you familiar with this</b></p> <p>18     <b>document?</b></p> <p>19     A. Yes.</p> <p>20     <b>Q. Okay. I'm just going to scroll down,</b></p> <p>21     <b>sir, to the last page.</b></p> <p>22     A. Okay.</p> <p>23     <b>Q. Is that your signature at the bottom</b></p> <p>24     <b>of this page?</b></p>

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<p>1           A. Yes, ma'am.</p> <p>2           <b>Q. Okay. And you see the date next to</b></p> <p>3           <b>it? It says October 12, 2017?</b></p> <p>4           A. Yes.</p> <p>5           <b>Q. Okay. Was that the time period in</b></p> <p>6           <b>which -- strike that.</b></p> <p>7           <b>Was July -- I'm sorry -- October 2017</b></p> <p>8           <b>the time period in which this affidavit was</b></p> <p>9           <b>drafted?</b></p> <p>10          A. I don't know if that was the day it</p> <p>11          was drafted, but that was the day I signed it.</p> <p>12          <b>Q. Okay. Did you participate in the</b></p> <p>13          <b>drafting of this affidavit?</b></p> <p>14          MR. FLAXMAN: I'm going to object and</p> <p>15          instruct him not to answer about his work with</p> <p>16          his attorney.</p> <p>17          BY MS. WEST:</p> <p>18          <b>Q. Did you review this affidavit prior</b></p> <p>19          <b>to signing it?</b></p> <p>20          A. Yes.</p> <p>21          <b>Q. Okay. And did you review this</b></p> <p>22          <b>document prior to your deposition today?</b></p> <p>23          A. Yes.</p> <p>24          <b>Q. Okay. When you reviewed the</b></p>	<p>1           A. No, I haven't.</p> <p>2           <b>Q. Have you ever spoken to anyone with</b></p> <p>3           <b>the federal government regarding your July 2004</b></p> <p>4           <b>arrest?</b></p> <p>5           A. No.</p> <p>6           <b>Q. Have you ever spoken to any reporters</b></p> <p>7           <b>or news media outlet regarding your July 2004</b></p> <p>8           <b>arrest?</b></p> <p>9           A. No.</p> <p>10          <b>Q. Do you still keep in contact with any</b></p> <p>11          <b>of the individuals that you sold drugs with at</b></p> <p>12          <b>the Ida B. Wells?</b></p> <p>13          A. I don't really keep in contact with</p> <p>14          them, but if I see them, I -- you know, I speak</p> <p>15          to them.</p> <p>16          <b>Q. The individual that you sold for,</b></p> <p>17          <b>Baker, when was the last time you had contact</b></p> <p>18          <b>with him?</b></p> <p>19          A. Oh, I -- as a matter of fact, I seen</p> <p>20          Baker about -- about a month ago, I think.</p> <p>21          <b>Q. And where did you see Baker?</b></p> <p>22          A. I seen Baker in Ellis Park.</p> <p>23          <b>Q. Did you speak with Mr. Baker during</b></p> <p>24          <b>that time about the lawsuit that you filed</b></p>
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<p>1           <b>affidavit in preparation for your deposition</b></p> <p>2           <b>today, did you find everything to be true and</b></p> <p>3           <b>accurate?</b></p> <p>4           A. Yes.</p> <p>5           <b>Q. All right. I'm going to scroll down</b></p> <p>6           <b>here.</b></p> <p>7           <b>Do you see Paragraph 27?</b></p> <p>8           A. Yes, ma'am.</p> <p>9           <b>Q. Okay. It says: At the time of my</b></p> <p>10          <b>arrest, it was common knowledge in the community</b></p> <p>11          <b>that Watts and members of his team were crooked</b></p> <p>12          <b>officers.</b></p> <p>13          <b>Do you see that?</b></p> <p>14          A. Yes, I do.</p> <p>15          <b>Q. Who were the officers that were part</b></p> <p>16          <b>of Sergeant Watts' team that were known to be</b></p> <p>17          <b>crooked?</b></p> <p>18          A. Just him and Mohammed.</p> <p>19          <b>Q. Have you ever given a statement to</b></p> <p>20          <b>the Civilian Office of Police Accountability?</b></p> <p>21          A. No.</p> <p>22          <b>Q. Have you ever spoken with anyone at</b></p> <p>23          <b>the Cook County State's Attorney's Office</b></p> <p>24          <b>regarding your July 2004 arrest?</b></p>	<p>1           <b>against the City and other officers?</b></p> <p>2           A. No.</p> <p>3           <b>Q. Okay. Before this -- this last</b></p> <p>4           <b>meeting with Mr. Baker, did you have regular</b></p> <p>5           <b>contact with him?</b></p> <p>6           A. No.</p> <p>7           <b>Q. Are you aware that other individuals</b></p> <p>8           <b>have filed lawsuits against the City of Chicago</b></p> <p>9           <b>and various police officers related to what</b></p> <p>10          <b>they're claiming were false arrests that took</b></p> <p>11          <b>place in the Ida B. Wells?</b></p> <p>12          A. Yes.</p> <p>13          <b>Q. Okay. Do you know any of those</b></p> <p>14          <b>individuals?</b></p> <p>15          A. Yes, I know a few of them, yes.</p> <p>16          <b>Q. Who do you know that's filed similar</b></p> <p>17          <b>lawsuits?</b></p> <p>18          A. Do you want government names or</p> <p>19          nicknames because I don't know all of the --</p> <p>20          <b>Q. Sure.</b></p> <p>21          A. -- government --</p> <p>22          <b>Q. Let's start with the government names</b></p> <p>23          <b>that you know.</b></p> <p>24          A. Government names I know, one of them</p>

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<p style="text-align: center;">Page 122</p> <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 --</p> <p><b>Q. Do you --</b> 10 A. -- for right now.</p> <p><b>Q. Do you keep in contact with Christian 11 or Greedy on a regular basis?</b> 13 A. Yeah, I -- yeah.</p> <p><b>Q. Do you talk on the telephone?</b> 15 A. Well, actually, I cut his hair, so 16 that's -- that's how we keep in contact.</p> <p><b>Q. How often would you say you see him?</b> 18 A. I see him -- unless he is in the 19 neighborhood, I see him, you know, quite -- 20 quite often.</p> <p><b>Q. And do you keep in regular contact 21 with Lionel?</b> 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 style="text-align: center;">Page 124</p> <p><b>Christian about your lawsuit?</b> 1 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.</p> <p><b>Q. And how about Lionel; have you talked 12 to him about your lawsuit?</b> 14 A. I have talked to him about it.</p> <p><b>Q. Has he talked to you about his 15 lawsuit?</b> 17 A. Not -- not in depth, no.</p> <p><b>Q. Okay. What did -- what did you talk 18 to Lionel about your lawsuit? What did you guys 19 discuss?</b> 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>
<p style="text-align: center;">Page 123</p> <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.</p> <p><b>Q. And how about Smoke; do you keep in 4 regular contact with Smoke?</b> 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.</p> <p><b>Q. Do you ever speak with Christian 13 or -- Christian about the lawsuit that you 14 filed?</b> 16 A. Yeah, I spoke to him about it before.</p> <p><b>Q. Did you ever speak with Lionel or 17 Smoke about the lawsuit you filed?</b> 19 A. Yep.</p> <p><b>Q. Okay. Do Christian, Lionel, or Smoke 20 speak with you about the lawsuits they have 21 filed?</b> 23 A. Yes.</p> <p><b>Q. What has -- what have you told</b></p>	<p style="text-align: center;">Page 125</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.</p> <p><b>Q. And how about Smoke; have you spoken 6 with him about your lawsuit?</b> 8 A. Yeah.</p> <p><b>Q. And what --</b> 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 <b>Q. Mr. Blair, do you know a police 20 officer by the name of Calvin Ridgell?</b> 21 A. No, I don't.</p> <p><b>Q. Okay. Do you know a police officer 22 by the name of Kenneth Young?</b> 23 A. No, I don't.</p>

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

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

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

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

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

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

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<p>1   <b>do you remember a guy name Tweak?</b></p> <p>2    A. Yes.</p> <p>3    <b>Q. And Tweak was a guy who sold</b></p> <p>4    <b>narcotics in the Ida B. Wells?</b></p> <p>5    A. Yes.</p> <p>6    <b>Q. Okay. Do you know whether or not</b></p> <p>7    <b>Tweak had any relationship with Baker?</b></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     <b>Q. Okay. Now, I think maybe Tweak dealt</b></p> <p>11    <b>with a guy named Art. Do you know a guy named</b></p> <p>12    <b>Art?</b></p> <p>13      A. Yes, I do.</p> <p>14      <b>Q. Okay. And you know him as a drug</b></p> <p>15    <b>dealer?</b></p> <p>16      A. Yes.</p> <p>17      <b>Q. Okay. And you know what? For the</b></p> <p>18    <b>record, I'm going to have to ask you the --</b></p> <p>19    <b>their -- about their real names, and you may or</b></p> <p>20    <b>may not know them.</b></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    <b>Q. Okay. Now -- but Double R, you</b></p> <p>3    <b>don't -- you only know his first name was</b></p> <p>4    <b>Reggie, correct?</b></p> <p>5      A. Correct.</p> <p>6      <b>Q. All right. Now, Peanut, is he a --</b></p> <p>7    <b>was he a dealer, too?</b></p> <p>8      A. No, Peanut was security.</p> <p>9      <b>Q. Security?</b></p> <p>10     A. Yeah, he worked security.</p> <p>11     <b>Q. For who?</b></p> <p>12     A. For -- I don't know; anybody.</p> <p>13     <b>Q. For anybody, huh?</b></p> <p>14     A. Yeah.</p> <p>15     <b>Q. All right. All right. Do, you</b></p> <p>16    <b>know -- do you know whether or not that's Brian</b></p> <p>17    <b>Patrick (phonetic)?</b></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     <b>Q. Okay. How about Lionel; is that --</b></p> <p>22    <b>is he an older guy?</b></p> <p>23      A. No.</p> <p>24      <b>Q. Young guy?</b></p>
<p style="text-align: center;">Page 151</p> <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      <b>Q. Okay.</b></p> <p>4      A. -- know his first name was Arthur,</p> <p>5      yeah.</p> <p>6      <b>Q. Okay. How about Tweak; do you know</b></p> <p>7    <b>him as Jamar Lewis?</b></p> <p>8      A. No. I know him as Tweak.</p> <p>9      <b>Q. Okay. Good.</b></p> <p>10     <b>Among the other dealers there, did</b></p> <p>11    <b>you know a guy named Fuzz?</b></p> <p>12      A. Yeah, I know Fuzz.</p> <p>13      <b>Q. Okay. He's a dealer, too? Was?</b></p> <p>14      A. Was. Was a dealer --</p> <p>15      <b>Q. Okay.</b></p> <p>16      A. -- was.</p> <p>17      <b>Q. And for the record, that's Leonard</b></p> <p>18    <b>Gibson, if you know?</b></p> <p>19      A. Yep. Yeah.</p> <p>20      <b>Q. All right. And then, finally, how</b></p> <p>21    <b>about a guy named Bob, Bob Coleman (phonetic)?</b></p> <p>22      A. Yeah, I know Big Bob, yes.</p> <p>23      <b>Q. Big Bob, yeah. And he's a dealer</b></p> <p>24    <b>there as well?</b></p>	<p style="text-align: center;">Page 153</p> <p>1    A. No, he -- Lionel about my age, a</p> <p>2    little bit younger than me, I think.</p> <p>3      <b>Q. All right. He didn't go by the name</b></p> <p>4    <b>Pig, did he?</b></p> <p>5      A. Pig?</p> <p>6      <b>Q. Pig.</b></p> <p>7      A. No.</p> <p>8      <b>Q. All right.</b></p> <p>9      A. Lionel, no, not the Lionel I know.</p> <p>10     <b>Q. All right.</b></p> <p>11     A. It could be, but I don't -- I don't</p> <p>12     recall that.</p> <p>13     <b>Q. Yeah, I forget you're kind of an old</b></p> <p>14    <b>guy, too. I'm trying to figure out -- well, let</b></p> <p>15    <b>me ask you, do you know if Lionel White is the</b></p> <p>16    <b>name of --</b></p> <p>17      A. Yeah, I know Lionel White.</p> <p>18      <b>Q. Is that the guy we've been talking</b></p> <p>19    <b>about?</b></p> <p>20      A. No, not Pig. Lionel White, his</p> <p>21      nickname is Box.</p> <p>22      <b>Q. Okay. I'm sorry. When you were</b></p> <p>23    <b>talking about Lionel earlier in questions to</b></p> <p>24    <b>Ms. West, were you referring to Lionel White?</b></p>

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<p>1       A. Yes.</p> <p>2       <b>Q. Okay. Fine. And let me ask you</b></p> <p>3       <b>this: Do you know whether or not Greedy's name</b></p> <p>4       <b>is Chris Scott?</b></p> <p>5       A. Is Chris who?</p> <p>6       <b>Q. Scott.</b></p> <p>7       A. Christian Scott. That's it.</p> <p>8       <b>Q. Okay.</b></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      <b>Q. All right. All right. And then --</b></p> <p>12      <b>so, now, you guys -- Scott, Smoke, Lionel --</b></p> <p>13      <b>when you get together, you said you guys, you</b></p> <p>14      <b>know, maybe just do some small talk about the</b></p> <p>15      <b>case, right?</b></p> <p>16      A. Yeah.</p> <p>17      <b>Q. And talk about, like, the future, you</b></p> <p>18      <b>know, what might be at the end of the case?</b></p> <p>19      A. I mean, you know -- I mean, we</p> <p>20      don't -- yeah, I guess you -- we --</p> <p>21      <b>Q. Okay --</b></p> <p>22      A. -- I guess you could say --</p> <p>23      <b>Q. What kind of numbers have you been</b></p> <p>24      <b>throwing around, generally?</b></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      <b>Q. Hello, Mr. Blair. My name is --</b></p> <p>18      A. Hi.</p> <p>19      <b>Q. -- Ahmed Kosoko. I represent Ronald</b></p> <p>20      <b>Watts. So I think I'm going to bring in the</b></p> <p>21      <b>anchor on this relay, all right?</b></p> <p>22      A. Okay.</p> <p>23      <b>Q. Mr. Blair, you said you were a --</b></p> <p>24      <b>you're a barber; is that correct?</b></p>
<p style="text-align: center;">Page 155</p> <p>1       A. Don't nobody throw around no numbers</p> <p>2       because don't nobody --</p> <p>3       <b>Q. No?</b></p> <p>4       A. -- know.</p> <p>5       <b>Q. All right. You've been thinking</b></p> <p>6       <b>about -- anybody talking about what they're</b></p> <p>7       <b>going to do with the money?</b></p> <p>8       A. Not really.</p> <p>9       <b>Q. Okay.</b></p> <p>10      A. I just know what I'm going to do with</p> <p>11      my money.</p> <p>12      <b>Q. All right. You don't want to invest</b></p> <p>13      <b>it in any law firms or anything, do you? No?</b></p> <p>14      MR. PALLE: 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. PALLE: 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: center;">Page 157</p> <p>1       A. Yes.</p> <p>2       <b>Q. Did you actually go to barber's</b></p> <p>3       <b>college?</b></p> <p>4       A. No.</p> <p>5       <b>Q. So you just learned -- you learned to</b></p> <p>6       <b>cut through experience?</b></p> <p>7       A. Yes.</p> <p>8       <b>Q. And what kind of haircuts are you</b></p> <p>9       <b>able to cut?</b></p> <p>10      A. Everything: fades, Afros, tapers.</p> <p>11      You name it, I cut it.</p> <p>12      <b>Q. Do you do -- do you do razor linings?</b></p> <p>13      A. Yes, I do.</p> <p>14      <b>Q. You're able to do -- and you're able</b></p> <p>15      <b>to cut Black and white hair?</b></p> <p>16      A. Yes.</p> <p>17      <b>Q. Okay. And of your 20 clients, how</b></p> <p>18      <b>many of them are of -- are African-American?</b></p> <p>19      A. All of them.</p> <p>20      <b>Q. Okay.</b></p> <p>21      (Cell phone ringing.)</p> <p>22      BY MR. KOSOKO:</p> <p>23      <b>Q. And how much do you charge for --</b></p> <p>24      <b>charge for a head?</b></p>

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<p>1       A. I charge \$25 a haircut.</p> <p>2       <b>Q. \$25 a haircut?</b></p> <p>3       A. Mm-hm.</p> <p>4       <b>Q. And is that for any -- any haircut?</b></p> <p>5       <b>So even if it's just a lining, you would just</b></p> <p>6       <b>charge 25?</b></p> <p>7       A. No, for a line, I charge 15.</p> <p>8       <b>Q. Okay. So 25 for any haircut, 15 for</b></p> <p>9       <b>a line?</b></p> <p>10      A. Mm-hm.</p> <p>11      <b>Q. And in your -- you cut at that</b></p> <p>12      <b>3610 Rhodes address?</b></p> <p>13      A. Yes.</p> <p>14      <b>Q. Do you actually have a barber's chair</b></p> <p>15      <b>there?</b></p> <p>16      A. Yes.</p> <p>17      <b>Q. Is it down in, like, a basement?</b></p> <p>18      A. Yes.</p> <p>19      <b>Q. How much -- how much traffic do you</b></p> <p>20      <b>get a day?</b></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       <b>Q. And when was the last time you cut at</b></p> <p>3       <b>that place?</b></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       <b>Q. Where was it located?</b></p> <p>8       A. On 35th and -- 35th and Giles,</p> <p>9       between Calumet --</p> <p>10      <b>Q. 35th and --</b></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      <b>Q. So this -- when you cut at the</b></p> <p>16      <b>barbershop before you started cutting at home,</b></p> <p>17      <b>was this before or after the arrest that is at</b></p> <p>18      <b>issue for this lawsuit?</b></p> <p>19      A. I -- I cut before that -- this arrest</p> <p>20      at the barber shop.</p> <p>21      <b>Q. So in 2004, you were cutting at the</b></p> <p>22      <b>barbershop?</b></p> <p>23      A. No. In 2004, I was cutting at home.</p> <p>24      <b>Q. Okay.</b></p>
<p style="text-align: center;">Page 159</p> <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       <b>Q. Okay. So are you appointment only?</b></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      <b>Q. Okay --</b></p> <p>12      A. -- if I'm not -- I just do what they</p> <p>13      need to be done.</p> <p>14      <b>Q. Okay. And you've been doing this for</b></p> <p>15      <b>how long?</b></p> <p>16      A. I've been doing that since I was, oh,</p> <p>17      about 21.</p> <p>18      <b>Q. You've been kind of doing the barber</b></p> <p>19      <b>stuff since you were 21?</b></p> <p>20      A. Mm-hm.</p> <p>21      <b>Q. Okay. What was the name of the shop</b></p> <p>22      <b>that you cut at before you had the dispute over</b></p> <p>23      <b>the -- the seat fees?</b></p> <p>24      A. I can't remember. I don't remember</p>	<p style="text-align: center;">Page 161</p> <p>1       A. I was cutting in my basement.</p> <p>2       <b>Q. All right. So you were arrested in</b></p> <p>3       <b>July of 2004 in this case; is that correct?</b></p> <p>4       A. That's correct.</p> <p>5       <b>Q. Okay. Let's go back to January</b></p> <p>6       <b>of 2004.</b></p> <p>7       <b>Were you cutting at the barbershop in</b></p> <p>8       <b>January of 2004?</b></p> <p>9       A. No.</p> <p>10      <b>Q. Okay. What about February; did you</b></p> <p>11      <b>cut in February of 2004?</b></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      <b>Q. All right. So the barbershop was</b></p> <p>20      <b>only for a few months --</b></p> <p>21      A. Right.</p> <p>22      <b>Q. -- sometime in 2002 or 2003?</b></p> <p>23      A. Mm-hm.</p> <p>24      <b>Q. Okay. So you were having -- who was</b></p>

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<p>1     <b>the owner of the shop?</b></p> <p>2     A. This guy named Wayne. I don't know</p> <p>3     his last name.</p> <p>4     <b>Q. And how much -- how much was he</b></p> <p>5     <b>charging you to have a chair there?</b></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     <b>Q. Back in '02?</b></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    <b>Q. Okay. And so you all -- you all had</b></p> <p>13    <b>a dispute over this and you said: I'm out?</b></p> <p>14    A. I -- right.</p> <p>15    <b>Q. And so after that, you started</b></p> <p>16    <b>cutting at home?</b></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>	<p>1     <b>narcotics, you did it only to take care of your</b></p> <p>2     <b>basic needs and your addiction; is that correct?</b></p> <p>3     A. That's correct.</p> <p>4     <b>Q. Okay. How long did you sell illegal</b></p> <p>5     <b>narcotics during your lifetime?</b></p> <p>6     A. Maybe about 30 years.</p> <p>7     <b>Q. When was the last time you sold</b></p> <p>8     <b>illegal narcotics?</b></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    <b>Q. Okay. In 2010 when you sold</b></p> <p>12    <b>narcotics, did you sell -- I apologize,</b></p> <p>13    <b>Mr. Blair. I'm --</b></p> <p>14    A. That's okay.</p> <p>15    <b>Q. I got a respiratory infection that I</b></p> <p>16    <b>can't shake, okay. So I apologize.</b></p> <p>17    A. All right.</p> <p>18    <b>Q. When you were selling narcotics in</b></p> <p>19    <b>2010, where in the city did you sell?</b></p> <p>20    A. In my neighborhood.</p> <p>21    <b>Q. And you still lived in the low end?</b></p> <p>22    A. Yes.</p> <p>23    <b>Q. I don't want to get -- don't -- you</b></p> <p>24    <b>don't need to get too specific about where in</b></p>
<p style="text-align: center;">Page 163</p> <p>1     rent was concerned. So I was like, man, I</p> <p>2     ain't...</p> <p>3     <b>Q. All right. So you had issue with the</b></p> <p>4     <b>250. When did you first start hustling?</b></p> <p>5     A. When did I first start hustling?</p> <p>6     <b>Q. Yes, sir.</b></p> <p>7     A. Maybe in the late '90s.</p> <p>8     <b>Q. So -- and when we say "hustling,"</b></p> <p>9     <b>I'll translate, when you first started selling</b></p> <p>10    <b>narcotics.</b></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    <b>Q. Now, when you first started -- when</b></p> <p>15    <b>you first started hustling, you didn't have your</b></p> <p>16    <b>heroin problem, right?</b></p> <p>17    A. Yeah, I did.</p> <p>18    <b>Q. You did. Okay. You developed your</b></p> <p>19    <b>heroin addiction when you were a teenager; is</b></p> <p>20    <b>that correct?</b></p> <p>21    A. Yeah, when I was about 18, yeah.</p> <p>22    <b>Q. Okay.</b></p> <p>23    A. 18 --</p> <p>24    <b>Q. And when you started to sell</b></p>	<p style="text-align: center;">Page 165</p> <p>1     <b>your neighborhood, but...</b></p> <p>2     <b>Okay. When you -- when you sold in</b></p> <p>3     <b>your neighborhood, how did people purchase from</b></p> <p>4     <b>you in 2010?</b></p> <p>5     A. They would call me, call my phone.</p> <p>6     <b>Q. Okay. And --</b></p> <p>7     A. Unless they caught me on the street.</p> <p>8     <b>Q. Okay. So when you sold in 2010, you</b></p> <p>9     <b>wasn't, like, pitching out --</b></p> <p>10    A. No.</p> <p>11    <b>Q. -- like, in the streets or like --</b></p> <p>12    <b>you know what I'm saying, or --</b></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    <b>Q. Or, like -- like, you know, near a</b></p> <p>16    <b>storefront or anything like that or...</b></p> <p>17    A. No. No.</p> <p>18    <b>Q. So -- and did you sell heroin, or did</b></p> <p>19    <b>you sell cocaine?</b></p> <p>20    A. I sold heroin.</p> <p>21    <b>Q. Okay. And so people -- it was just</b></p> <p>22    <b>kind of people would call you and if you had</b></p> <p>23    <b>some, you'd sell it?</b></p> <p>24    A. Exactly.</p>

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

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

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<p style="text-align: right;">Page 174</p> <p>1       <b>Q. And that signified to the people</b>    2       <b>pitching that day to -- to stop selling drugs --</b>    3        A. Stop what they're doing --    4       <b>Q. -- correct?</b>    5        A. -- and -- yeah.    6       <b>Q. All right. So how long did you</b>    7       <b>freelance or be a free agent in the drug trade</b>    8       <b>before you had your first contact with police?</b>    9        A. When I had first contact with who?    10      <b>Q. Got arrested.</b>    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      <b>Q. So the first time CPD caught you as</b>    17      <b>part of a drug operation was in the early 2000s;</b>    18      <b>is that correct?</b>    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       <b>Q. Okay. So in the early 2000s, you</b>    2       <b>were arrested for selling drugs, right?</b>    3       A. No, I was arrested for having drugs.    4       <b>Q. Okay. Now, when you were arrested</b>    5       <b>for having drugs, when you were caught in the</b>    6       <b>early 2000s, was it because your own</b>    7       <b>personal-use drugs that they caught you with?</b>    8       A. Yes. Yes.    9       <b>Q. Can you tell me about the</b>    10      <b>circumstances of that arrest?</b>    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      <b>Q. Okay. And what was the resolution of</b>    18      <b>that arrest?</b>    19       A. I think I probably went to IDOC and    20       did maybe 61 days.    21      <b>Q. Okay. And did you plead guilty to</b>    22      <b>that offense?</b>    23       A. Yeah.    24      <b>Q. Okay. Were you appointed a public</b></p>
<p style="text-align: right;">Page 175</p> <p>1       BY MR. KOSOKO:    2       <b>Q. Okay --</b>    3       A. -- per se.    4       <b>Q. -- the first time you were arrested</b>    5       <b>for a narcotics charge, were you involved in the</b>    6       <b>trade -- the distribution of narcotics?</b>    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      <b>Q. Okay. So the first time you were</b>    11      <b>caught selling drugs, you were just -- you were</b>    12      <b>selling your own drugs; you weren't pitching for</b>    13      <b>somebody else; you weren't --</b>    14       A. Oh, yeah, I was pitching for    15       somebody. Yeah, I was pitching for somebody --    16      <b>Q. Okay. So --</b>    17       A. -- yeah.    18      <b>Q. -- I'll try to make my questions as</b>    19      <b>clear as possible. I'm doing it --</b>    20       A. Okay.    21      <b>Q. -- one, you know, for the legal --</b>    22      <b>legal way, but I'll try to talk to you in a</b>    23      <b>common way as much as possible, okay?</b>    24       A. Okay.</p>	<p style="text-align: right;">Page 177</p> <p>1       <b>defender to represent you for that offense?</b>    2       A. Yes.    3       <b>Q. The next time that you were arrested</b>    4       <b>for a drug charge, how long after that did that</b>    5       <b>occur?</b>    6       A. I don't know; maybe -- maybe a year    7       or two later.    8       <b>Q. Okay. And do you remember what</b>    9       <b>happened with that arrest?</b>    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      <b>Q. Okay. Now, the cases that you --</b>    14      <b>that you beat, how did you beat them?</b>    15       A. I beat them in, like, the    16       preliminary -- preliminary hearing, you know.    17      <b>Q. Okay. And in these cases that you</b>    18      <b>beat during the prelim, were you represented by</b>    19      <b>the public defender's office?</b>    20       A. Yes.    21      <b>Q. Now, when was the first time that you</b>    22      <b>encountered the person you know to be Ronald</b>    23      <b>Watts?</b>    24       A. The first time I encountered Ronald</p>

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

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<p>1     <b>bathroom; is that correct?</b></p> <p>2     A. Yeah.</p> <p>3     <b>Q. He had a conversation with --</b></p> <p>4     MR. FLAXMAN: Objection --</p> <p>5     BY MS. WEST:</p> <p>6     <b>Q. -- Short Body --</b></p> <p>7     MR. FLAXMAN: Hold on. Hold on. I'm</p> <p>8     sorry. I'm objecting to form.</p> <p>9     And I'm sorry that I talked over your</p> <p>10    next question.</p> <p>11    MR. KOSOKO: It's all right, Joel.</p> <p>12    BY MR. KOSOKO:</p> <p>13    <b>Q. Mr. Watts allegedly used the</b></p> <p>14    <b>bathroom; is that right?</b></p> <p>15    A. Yes.</p> <p>16    <b>Q. Okay. And then after he returned out</b></p> <p>17    <b>of the bathroom, what was he and Short Body</b></p> <p>18    <b>talking about?</b></p> <p>19    A. I don't know. I was in my room.</p> <p>20    They was in the living room. So I don't know.</p> <p>21    <b>Q. Now, when you say he hit Short Body</b></p> <p>22    <b>and then Short Body hit you, what do you mean by</b></p> <p>23    <b>that?</b></p> <p>24    A. He gave Short Body a bundle of dope.</p>	<p>1     <b>next time you saw Sergeant Watts after this</b></p> <p>2     <b>2001/2002 incident --</b></p> <p>3     A. Um --</p> <p>4     <b>Q. Oh, by the way -- I'm sorry. I'll</b></p> <p>5     <b>withdraw that question for now.</b></p> <p>6     <b>What month in 2001 or 2002 did this</b></p> <p>7     <b>incident happen?</b></p> <p>8     A. Oh, it was in the summer, so I want</p> <p>9     to say maybe, like, July.</p> <p>10    <b>Q. Okay.</b></p> <p>11    A. Something like that.</p> <p>12    <b>Q. So July of '01 or '02; is that</b></p> <p>13    <b>correct?</b></p> <p>14    A. July -- yeah, that's correct.</p> <p>15    <b>Q. In the 575 Building; is that right?</b></p> <p>16    A. That's right.</p> <p>17    <b>Q. Okay. And when was the next time you</b></p> <p>18    <b>encountered Sergeant Watts?</b></p> <p>19    A. The next time I encountered Sergeant</p> <p>20    Watts was we were -- we were outside. We was</p> <p>21    outside one day. We was outside, a whole bunch</p> <p>22    of us was outside --</p> <p>23    <b>Q. And what year was this?</b></p> <p>24    A. I don't know; it could have been</p>
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<p>1     <b>Q. Okay. And you saw Sergeant Watts in</b></p> <p>2     <b>2001/2002 in the presence of Mohammed give</b></p> <p>3     <b>Short Body a bundle of dope?</b></p> <p>4     A. Well, I was not -- well, like I said,</p> <p>5     they were in -- they were in our apartment,</p> <p>6     they -- you know, and Short Body didn't have</p> <p>7     nothing. I didn't have anything. So -- and</p> <p>8     when they -- when he -- when Watts left, when he</p> <p>9     left out the door, he was like: Man, your man</p> <p>10    got you.</p> <p>11    And I was like: All right.</p> <p>12    And I went in there, and Short Body,</p> <p>13    he gave me a few bags.</p> <p>14    <b>Q. Okay. And so Watts and Mohammed</b></p> <p>15    <b>didn't arrest you on this day; is that correct?</b></p> <p>16    A. No.</p> <p>17    <b>Q. Okay. It's your belief that they</b></p> <p>18    <b>gave Short Body some drugs?</b></p> <p>19    A. I know they did.</p> <p>20    <b>Q. Okay. And then from those drugs,</b></p> <p>21    <b>Short Body gave you those drugs; is that</b></p> <p>22    <b>correct?</b></p> <p>23    A. Yeah, he gave me some, yeah.</p> <p>24    <b>Q. Okay. All right. And when was the</b></p>	<p>1     maybe '03, something like that.</p> <p>2     <b>Q. How many months after this July of</b></p> <p>3     <b>'01 or '02 incident was it?</b></p> <p>4     A. How many -- how many months it was</p> <p>5     after --</p> <p>6     <b>Q. Yes, sir.</b></p> <p>7     A. I don't know; it was maybe, like --</p> <p>8     maybe six or seven months, maybe seven months</p> <p>9     after the first encounter with the -- when he</p> <p>10    came to the apartment about -- maybe about seven</p> <p>11    months after that.</p> <p>12    <b>Q. Now, were you still -- going back to</b></p> <p>13    <b>this 2001 or 2002 incident, were you still</b></p> <p>14    <b>married to your wife at that time?</b></p> <p>15    A. No, we were going through divorce</p> <p>16    then --</p> <p>17    <b>Q. And what was your wife's name, by the</b></p> <p>18    <b>way?</b></p> <p>19    A. Pamela.</p> <p>20    <b>Q. She had the same last name, Pamela</b></p> <p>21    <b>Bair -- Blair?</b></p> <p>22    A. Blair, yeah.</p> <p>23    <b>Q. Okay. Now, prior to this first</b></p> <p>24    <b>encounter with Sergeant Watts, had you been in</b></p>

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

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

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

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<p style="text-align: right;">Page 198</p> <p>1       <b>Q. Okay. But that day, he struck you</b>    2       <b>with his left hand; is that correct?</b>    3        MR. FLAXMAN: Objection, asked and    4        answered.    5        You can answer.    6        BY THE WITNESS:    7        A. Yes.    8        BY MR. KOSOKO:    9        <b>Q. Okay. Bending the right arm of your</b>    10       <b>glasses; is that correct?</b>    11       A. Yes.    12       <b>Q. Okay. Were you cuffed when this</b>    13       <b>occurred?</b>    14       A. No.    15       <b>Q. Okay. When were you cuffed that day?</b>    16       A. I was cuffed after, after that, right    17       after that.    18       <b>Q. And who placed you in handcuffs right</b>    19       <b>after that?</b>    20       A. Mohammed.    21       <b>Q. Okay. So now let's go back to when</b>    22       <b>you first encountered the police.</b>    23       <b>Who was the very first officer you</b>    24       <b>encountered on July 10, 2004?</b></p>	<p style="text-align: right;">Page 200</p> <p>1       You, you, you, you, come here.    2       <b>Q. All right. So hang on, Mr. Blair, so</b>    3       <b>we can make the record clear.</b>    4       A. Okay.    5       <b>Q. Was this thing you're recounting now,</b>    6       <b>is that something that Officer Mohammed is</b>    7       <b>telling you as he's bringing you into the</b>    8       <b>building?</b>    9       A. Yeah.    10       <b>Q. Okay. So Officer Mohammed --</b>    11       <b>which -- how did he make physical contact with</b>    12       <b>you? Did he grab you by your arm? Did he grab</b>    13       <b>you by your wrist? Did he just put his hand to</b>    14       <b>your back?</b>    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       <b>Q. Okay. So which shoulder did Officer</b>    20       <b>Mohammed place his hands upon?</b>    21       A. I don't know; maybe my left shoulder.    22       <b>Q. Okay. So Officer Mohammed placed</b>    23       <b>which -- which arm -- which hand of his did he</b>    24       <b>place on your left shoulder?</b></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       <b>Q. Okay. Who did you have physical</b>    5       <b>contact with first on July 10th of 2004, which</b>    6       <b>police officer?</b>    7       A. To my -- to my recollection, I think    8       it was Mohammed.    9       <b>Q. Okay. And how about -- did Officer</b>    10       <b>Mohammed make physical contact with you on</b>    11       <b>July 10, 2004?</b>    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       <b>Q. Okay. Could you describe this action</b>    17       <b>for us, please? Did he grab you by the arm?</b>    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       <b>Q. Okay. So he places his right hand on</b>    3       <b>your left shoulder and walks you into --</b>    4       A. Inside the building.    5       <b>Q. -- is that correct?</b>    6       A. Yes. Yes.    7       <b>Q. Okay. And when did he seat you down?</b>    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       <b>Q. Okay. And Officer Mohammed faced you</b>    15       <b>to the wall?</b>    16       A. Yes.    17       <b>Q. Okay.</b>    18       A. He put my head on the wall.    19       <b>Q. Okay. How long -- how -- how many</b>    20       <b>seconds elapsed from your time getting inside</b>    21       <b>the 540 Building to being placed on the ground</b>    22       <b>in front of the wall?</b>    23       A. I don't know; about 30 seconds, I    24       guess.</p>

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

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

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

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<p>1     <b>this preliminary hearing and watching the</b>  2     <b>testimony, correct?</b></p> <p>3     A. And what?</p> <p>4     Q. <b>And watching the testimony, correct?</b></p> <p>5     A. Well, yeah.</p> <p>6     Q. <b>What is the substance of what Officer</b>  7     <b>Jones stated as to why there was probable cause</b>  8     <b>to arrest you?</b></p> <p>9     A. I don't know.</p> <p>10    Q. <b>Isn't it true that Officer Jones</b>  11    <b>stated that he and his partner saw you pitching</b>  12    <b>that day?</b></p> <p>13    A. No --</p> <p>14    MR. FLAXMAN: Objection, foundation.</p> <p>15    BY THE WITNESS:</p> <p>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.</p> <p>22    BY MR. KOSOKO:</p> <p>23    Q. <b>All right.</b></p> <p>24    A. They couldn't see me pitching if I</p>	<p>1     A. Yes.</p> <p>2     Q. <b>You see your case number?</b></p> <p>3     A. Yes.</p> <p>4     Q. <b>Okay. Do you see that it was</b>  5     <b>actually before an Irish female by the name of</b>  6     <b>Maura Boyle?</b></p> <p>7     MR. FLAXMAN: Objection, foundation.</p> <p>8     BY THE WITNESS:</p> <p>9     A. I see it.</p> <p>10    BY MR. KOSOKO:</p> <p>11    Q. <b>So it wasn't -- it wasn't a male,</b>  12    <b>correct? It was a female judge, correct?</b></p> <p>13    A. It's a fe -- yeah, a female, a  14    female judge --</p> <p>15    Q. <b>Okay. And --</b></p> <p>16    A. -- a white judge.</p> <p>17    Q. <b>-- do you remember Ms. Julia [sic]</b>  18    <b>Payne represented you that day?</b></p> <p>19    A. I don't -- no, I don't remember.</p> <p>20    Q. <b>Okay. Do you remember your bond</b>  21    <b>hearing?</b></p> <p>22    A. That's -- that is the bond hearing.</p> <p>23    That's the bond hearing what we're talking about  24    right now.</p>
<p style="text-align: center;">Page 215</p> <p>1     was pitching, but I wasn't pitching that day. I  2     was standing outside.</p> <p>3     Q. <b>All right. Um --</b></p> <p>4     A. Do you understand what I'm saying?</p> <p>5     MR. FLAXMAN: Just let him ask a question.</p> <p>6     It's all right. Just answer the question.</p> <p>7     Don't worry.</p> <p>8     BY MR. KOSOKO:</p> <p>9     Q. <b>I'm going to screen-share this</b>  10    <b>exhibit for you, Mr. Blair.</b></p> <p>11    <b>(WHEREUPON, Watts Exhibit No. 1 was</b>  12    <b>presented to the witness.)</b></p> <p>13    BY MR. KOSOKO:</p> <p>14    Q. <b>We'll mark it as Watts Exhibit 1,</b>  15    <b>PL JOINT DO JOINT 20102 [sic].</b></p> <p>16    <b>Can you see that document, Mr. Blair?</b></p> <p>17    A. Yes, I see it.</p> <p>18    Q. <b>Do you see that -- it's the</b>  19    <b>transcript from the preliminary hearing in</b>  20    <b>the --</b></p> <p>21    A. Yes.</p> <p>22    Q. <b>-- case?</b></p> <p>23    A. Yeah. Yes, I see it.</p> <p>24    Q. <b>You see your name, correct?</b></p>	<p style="text-align: center;">Page 217</p> <p>1     Q. <b>No. I'm talking about the</b>  2     <b>preliminary hearing --</b></p> <p>3     A. This is the --</p> <p>4     Q. <b>-- not the bond hearing. Your bond</b>  5     <b>hearing would have been the very next day. Do</b>  6     <b>you remember that?</b></p> <p>7     A. Oh, okay.</p> <p>8     Q. <b>If you don't remember, it's --</b></p> <p>9     A. -- I'm not --</p> <p>10    Q. <b>-- fine. As --</b></p> <p>11    <b>(Unreportable cross-talk.)</b></p> <p>12    BY MR. KOSOKO:</p> <p>13    Q. <b>-- Ms. West stated earlier, if you</b>  14    <b>don't remember, it's fine to say you don't</b>  15    <b>remember. I'm not trying to trick you up,</b>  16    <b>all right?</b></p> <p>17    A. Okay. I don't -- I don't remember.</p> <p>18    Q. <b>Okay. So you don't remember -- you</b>  19    <b>don't remember anything about the public</b>  20    <b>defender that represented you for your bond</b>  21    <b>hearing, correct?</b></p> <p>22    A. No.</p> <p>23    Q. <b>Okay. Do you remember the State's</b>  24    <b>Attorney that was in bond court that day?</b></p>

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<p style="text-align: right;">Page 218</p> <p>1       A. No, I don't --</p> <p>2       <b>Q. Do you remember the judge that set</b></p> <p>3       <b>your bond the very next --</b></p> <p>4       MR. FLAXMAN: Objection. He's already told</p> <p>5       you. He doesn't remember the hearing. Why do</p> <p>6       you have to ask about every single thing about</p> <p>7       it?</p> <p>8       MR. KOSOKO: Because I'm going to make my</p> <p>9       record, Joel, because he seems to remember</p> <p>10       specifically the arrest but nothing before or</p> <p>11       after. If I have to explain my strategy to you,</p> <p>12       that's why.</p> <p>13       BY MR. KOSOKO:</p> <p>14       <b>Q. So you don't remember anything about</b></p> <p>15       <b>the day after, correct?</b></p> <p>16       MR. FLAXMAN: I object to the foundation.</p> <p>17       The day after what? Ask him a proper question</p> <p>18       and he'll --</p> <p>19       BY MR. KOSOKO:</p> <p>20       <b>Q. On July 11, 2004, what was the race</b></p> <p>21       <b>and sex of the judge that you had your bond</b></p> <p>22       <b>hearing in front of?</b></p> <p>23       MR. FLAXMAN: Objection, asked and</p> <p>24       answered.</p>	<p style="text-align: right;">Page 220</p> <p>1       <b>recollection --</b></p> <p>2       MR. FLAXMAN: That's why I'm making it, to</p> <p>3       note it.</p> <p>4       MR. KOSOKO: Perfect.</p> <p>5       BY MR. KOSOKO:</p> <p>6       <b>Q. You've got to answer my question,</b></p> <p>7       <b>Mr. Blair.</b></p> <p>8       A. Okay.</p> <p>9       MR. FLAXMAN: He wants to know do you</p> <p>10       remember him testifying to that?</p> <p>11       BY THE WITNESS:</p> <p>12       A. I don't remember him specifically</p> <p>13       saying this. No, I don't remember.</p> <p>14       But me seeing it, I guess, he did.</p> <p>15       BY MR. KOSOKO:</p> <p>16       <b>Q. Okay. Now, did you ever tell your</b></p> <p>17       <b>public defender that -- the story you're saying</b></p> <p>18       <b>now, which is that Sergeant Watts said drugs</b></p> <p>19       <b>that they found on the ground were the drugs</b></p> <p>20       <b>that were being attributed to you?</b></p> <p>21       A. Yeah, I told them, yeah.</p> <p>22       <b>Q. Okay. Did you tell Mr. Labrador that</b></p> <p>23       <b>that is what happened?</b></p> <p>24       MR. FLAXMAN: Objection, asked and</p>
<p style="text-align: right;">Page 219</p> <p>1       BY THE WITNESS:</p> <p>2       A. I do -- I don't remember.</p> <p>3       BY MR. KOSOKO:</p> <p>4       <b>Q. Okay. So now we'll fast-forward to</b></p> <p>5       <b>July 27th of 2004.</b></p> <p>6       <b>Do you recall Officer Jones being</b></p> <p>7       <b>asked this question and him giving this</b></p> <p>8       <b>response:</b></p> <p>9       <b>[As read] "What did you see the</b></p> <p>10       <b>defendant doing that date, time,</b></p> <p>11       <b>and location?</b></p> <p>12       <b>"ANSWER: I saw him conduct three</b></p> <p>13       <b>hand-to-hand narcotics</b></p> <p>14       <b>transactions."</b></p> <p>15       <b>Do you remember him being asked that</b></p> <p>16       <b>question and giving that response?</b></p> <p>17       MR. FLAXMAN: And before you answer, I'm</p> <p>18       going to state my objection that he's already</p> <p>19       told you he does not recall the substance of</p> <p>20       Officer Jones' testimony.</p> <p>21       MR. KOSOKO: Your record -- your -- I</p> <p>22       guess, your objection is noted, Joel.</p> <p>23       BY MR. KOSOKO:</p> <p>24       <b>Q. Does this refresh your</b></p>	<p style="text-align: right;">Page 221</p> <p>1       answered.</p> <p>2       BY THE WITNESS:</p> <p>3       A. That's what I remember telling him.</p> <p>4       BY MR. KOSOKO:</p> <p>5       <b>Q. Okay. Now, did you tell</b></p> <p>6       <b>Mr. Labrador this -- Mr. Labrador is the PD that</b></p> <p>7       <b>was appointed to fight the case after the</b></p> <p>8       <b>prelim, correct?</b></p> <p>9       A. Yes, I -- yeah, I guess, yes. But --</p> <p>10       and --</p> <p>11       <b>Q. All right. Let's go back for a</b></p> <p>12       <b>second, Mr. Blair.</b></p> <p>13       A. If you go back -- okay. Go ahead.</p> <p>14       <b>Q. Okay. The same public defender did</b></p> <p>15       <b>not represent you for your bond hearing,</b></p> <p>16       <b>correct?</b></p> <p>17       A. Correct.</p> <p>18       MR. FLAXMAN: Objection, foundation.</p> <p>19       BY MR. KOSOKO:</p> <p>20       <b>Q. Okay. The same public defender that</b></p> <p>21       <b>handled your bond hearing did not do your</b></p> <p>22       <b>prelim, correct?</b></p> <p>23       A. Correct.</p> <p>24       <b>Q. Okay. And Mr. Labrador did neither</b></p>

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<p style="text-align: right;">Page 222</p> <p>1     <b>your bond hearing or your prelim, correct?</b></p> <p>2     A.    Correct.</p> <p>3     <b>Q. Okay. You were appointed</b></p> <p>4     <b>Mr. Labrador after you were arraigned; is that</b></p> <p>5     <b>correct?</b></p> <p>6     A.    That's correct.</p> <p>7     <b>Q. Did you tell Mr. Labrador the story</b></p> <p>8     <b>that you are relaying today regarding --</b></p> <p>9     A.    As far as --</p> <p>10    <b>Q. -- (unreportable cross-talk) --</b></p> <p>11    A.    -- I remember, yes.</p> <p>12    <b>Q. Okay. When is the first time you</b></p> <p>13    <b>told Mr. Labrador that you were actually being</b></p> <p>14    <b>framed for drugs that they found on the ground?</b></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      <b>Q. Okay. Mr. Blair, you had a</b></p> <p>14      <b>discussion about the evidence -- the sufficiency</b></p> <p>15      <b>of the evidence against you; is that correct?</b></p> <p>16      A. Yeah.</p> <p>17      <b>Q. Okay. When did you tell your client</b></p> <p>18      <b>[sic] that you were being framed by my client,</b></p> <p>19      <b>Ronald Watts?</b></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      <b>Q. Okay. Isn't it true --</b></p> <p>24      A. -- that's what I told him.</p>
<p style="text-align: right;">Page 223</p> <p>1     <b>Q. All right.</b></p> <p>2     A. -- there's no way.</p> <p>3     <b>Q. Mr. Blair, listen to my question,</b></p> <p>4     <b>okay?</b></p> <p>5     <b>When did you tell Mr. Labrador the</b></p> <p>6     <b>story that you're saying today, which is that</b></p> <p>7     <b>Sergeant Watts attributed narcotics that he saw</b></p> <p>8     <b>on the ground to you?</b></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      <b>Q. Mr. Blair, do you remember using the</b></p> <p>17      <b>words "Ronald" and "Watts" when talking to</b></p> <p>18      <b>Mr. Labrador at any point?</b></p> <p>19      A. Huh?</p> <p>20      <b>Q. Did you ever even mention my client</b></p> <p>21      <b>to Mr. Labrador?</b></p> <p>22      A. I -- Yeah. Of course. I had to.</p> <p>23      <b>Q. And when you brought up my client,</b></p> <p>24      <b>what did you say to Mr. Labrador about it?</b></p>	<p style="text-align: right;">Page 225</p> <p>1       <b>Q. Isn't it true, Mr. Blair, that you</b></p> <p>2       <b>never brought up Sergeant Watts with</b></p> <p>3       <b>Mr. Labrador?</b></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      <b>Q. Okay. What if the officers are</b></p> <p>16      <b>saying they saw you make three transactions</b></p> <p>17      <b>outside of the building?</b></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>

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

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

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

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<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>	<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>
<p style="text-align: center;">Page 239</p> <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>	<p style="text-align: center;">Page 241</p> <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>

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<p style="text-align: center;">Page 242</p> <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>	<p style="text-align: center;">Page 244</p> <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>
<p style="text-align: center;">Page 243</p> <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>	<p style="text-align: center;">Page 245</p> <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>

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

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<p>Page 250</p> <p>1       <b>And he answered: Yes.</b>  2       <b>Correct?</b>  3       A. Yes.  4       <b>Q. Okay. Do you see -- do you recall at</b>  5       <b>any point during this hearing the words "Ronald"</b>  6       <b>and "Watts" being mentioned?</b>  7       A. No.  8       <b>Q. Did you whisper to Mr. Labrador that:</b>  9       <b>You've got to ask about Sergeant Watts?</b>  10       MR. FLAXMAN: I didn't -- I didn't hear  11       your question. I think you --  12       BY MR. KOSOKO:  13       <b>Q. Did you whisper to Mr. Labrador that</b>  14       <b>he should ask about Sergeant Watts?</b>  15       A. No, I didn't. But Sergeant Watts was  16       there.  17       <b>Q. Okay. Mr. Blair, other than that</b>  18       <b>moment where you're saying Sergeant Watts claims</b>  19       <b>that drugs two to three feet away from you were</b>  20       <b>yours, what other time has Sergeant Watts stated</b>  21       <b>that you violated the Controlled Substances Act?</b>  22       A. What are you -- do you mean what,  23       that --  24       <b>Q. Let's talk about this case, right?</b></p>	<p>Page 252</p> <p>1       BY MR. KOSOKO:  2       <b>Q. Reports where it states that Sergeant</b>  3       <b>Watts found drugs on you.</b>  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       <b>Q. You said he said he signed the</b>  10       <b>reports?</b>  11       A. Yeah. He said the --  12       <b>Q. Okay. Are familiar --</b>  13       A. -- arrest reports, yeah.  14       <b>Q. Okay. Are you familiar with the</b>  15       <b>Chicago Police Department General Orders?</b>  16       A. No, I'm not.  17       <b>Q. Are you familiar with any of the</b>  18       <b>Chicago Police Department Special Orders?</b>  19       A. No, I'm not.  20       <b>Q. Okay. Because -- that's because</b>  21       <b>you're not a police officer, correct?</b>  22       A. That's correct.  23       <b>Q. So you don't know what Sergeant</b>  24       <b>Watts' signature means on any of those reports,</b></p>
<p>Page 251</p> <p>1       A. Right --  2       <b>Q. You said Sergeant Watts said a bundle</b>  3       <b>of drugs found two, three feet away from you</b>  4       <b>were yours, correct?</b>  5       A. Right.  6       <b>Q. Okay. So it's your allegation that</b>  7       <b>that led to this lie about three transactions;</b>  8       <b>is that correct?</b>  9       A. Yes.  10       <b>Q. Okay. Other than him saying that,</b>  11       <b>did Sergeant Watts file any police reports</b>  12       <b>against you?</b>  13       MR. FLAXMAN: Objection, foundation.  14       BY THE WITNESS:  15       A. Not that -- I don't know.  16       BY MR. KOSOKO:  17       <b>Q. Okay. Did Sergeant Watts testify</b>  18       <b>that he saw you in constructive possession of</b>  19       <b>narcotics?</b>  20       A. No, not that I know of.  21       <b>Q. Okay. Are there any reports that --</b>  22       <b>of Sergeant Watts saying he found drugs on you?</b>  23       MR. FLAXMAN: I didn't hear. Are there  24       any reports --</p>	<p>Page 253</p> <p>1       <b>correct?</b>  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       <b>Q. You've got to answer me anyways,</b>  12       <b>Mr. Blair. Your attorney's very good, though,</b>  13       <b>but you still got to answer.</b>  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       <b>Q. Okay.</b>  21       A. -- at the time of the arrest were  22       there.  23       <b>Q. Okay.</b>  24       A. Okay.</p>

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

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

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

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<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 3 showing you on the screen?</p> <p>4 A. Yes, I do.</p> <p>5 Q. Do you recall -- do you recall ever 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 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 12 to earlier that you still reside to -- to this 13 day, correct?</p> <p>14 A. Yes, yes.</p> <p>15 Q. And the amount that's at issue here 16 is \$65, correct?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. What does the first sentence 19 of this state?</p> <p>20 A. [As read] "On July 10, 2004, the 21 amount of \$65 was seized by CPD for violations 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 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 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 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 15 didn't --</p> <p>16 BY MR. KOSOKO:</p> <p>17 Q. Well, you were found guilty in 2005, 18 correct?</p> <p>19 A. Yes, I was found guilty.</p> <p>20 Q. And you -- and you went to prison for 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 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 2 check, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. I'm going to show one more 5 document, and then I think I'm going to wrap it 6 up.</p> <p>7 A. Okay.</p> <p>8 Q. And this will be Watts Number 5. 9 (WHEREUPON, Watts Exhibit No. 5 was 10 presented to the witness.)</p> <p>11 BY MR. KOSOKO:</p> <p>12 Q. Mr. Blair, do you recall ever going 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 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 19 is listed on this document?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And that Kenneth Young is listed as 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 7 Laws' order, this went on -- you were exonerated 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 13 all prior to your representation before the 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 -- 18 actually, I didn't know that I could do that. 19 That's what -- that's why I waited so long. I 20 didn't know I could do that.</p> <p>21 Q. Now, Mr. Blair, at any point, did 22 you -- did you get remanded to HRDI to help with 23 your sentence credit?</p> <p>24 A. No.</p>

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<p style="text-align: right;">Page 270</p> <p>1       <b>Q. All right. This will be Watts</b>  2       <b>Number 6.</b>  3       <b>(WHEREUPON, Watts Exhibit No. 6 was</b>  4       <b>presented to the witness.)</b>  5       BY MR. KOSOKO:  6       <b>Q. Mr. -- do you see this?</b>  7       A. Yes.  8       <b>Q. You don't recall that on</b>  9       <b>September 23, 2004, Judge Laws had you admitted</b>  10      <b>to the HRDI program?</b>  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      <b>Q. But Judge Laws tried to put you in</b>  17      <b>HRDI --</b>  18      A. Yeah.  19      <b>Q. -- right?</b>  20      A. Yeah.  21      <b>Q. And let's -- Judge Laws was a solid</b>  22      <b>judge, right?</b>  23      MR. FLAXMAN: Objection, foundation.</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       <b>Q. What Ben were you speaking of?</b>  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       <b>Q. Okay. What Baker are you speaking</b>  8       <b>of?</b>  9       A. This -- another -- another guy from  10      the area.  11      <b>Q. Do you recall his first name or a</b>  12      <b>nickname, if you have one?</b>  13      A. We just call him Little Baker, but  14      it's not Ben, you know. I know Ben.  15      <b>Q. And so you never --</b>  16      A. I don't --  17      <b>Q. Sorry?</b>  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      <b>Q. So you never worked for Ben Baker?</b>  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      <b>Q. Hi, Mr. Blair. I --</b>  11      A. Hello.  12      <b>Q. -- represent the City. I have just a</b>  13      <b>few very brief questions for you.</b>  14      A. Okay.  15      <b>Q. Now, you testified earlier that you</b>  16      <b>worked security and pitched for multiple dealers</b>  17      <b>or distributors in the extensions, correct?</b>  18      A. Yes.  19      <b>Q. And one of those distributors was Ben</b>  20      <b>Baker?</b>  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      <b>Q. Who was --</b></p>	<p style="text-align: right;">Page 273</p> <p>1       follow-up.  2       FURTHER EXAMINATION  3       BY MR. KOSOKO:  4       <b>Q. Mr. Blair, you know --</b>  5       A. Yes.  6       <b>Q. -- you know Ben Baker?</b>  7       A. Yeah, I knew Ben.  8       <b>Q. And you knew that he -- was Ben Baker</b>  9       <b>a drug dealer?</b>  10      A. Yeah.  11      <b>Q. And you have enough knowledge about</b>  12      <b>Ben Baker to know that he might have been in the</b>  13      <b>joint when you picked up this case?</b>  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      <b>Q. All right.</b>  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      <b>Q. Mr. Blair, you know, I'm not even</b>  22      <b>going to go through the list because there's</b>  23      <b>probably 100 people.</b>  24      <b>But -- but -- so...</b></p>

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

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

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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

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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

*Michelle M. Yohler*

8

Michelle M. Yohler, CSR, RMR, CRR

9

Certified Shorthand Reporter

10

CSR No.: 84-4531.

11

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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

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15

HARVEY BLAIR

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Notary Public

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