

Exhibit 20



Transcript of the Deposition of
Shaun James

Case: In Re Watts Coordinated Pretrial Proceedings
Taken On: September 21, 2021

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

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Deposition of Shaun James - Taken 9/21/2021

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

In Re: WATTS COORDINATED)
PRETRIAL PROCEEDINGS,) No: 19 CV 01717
)

The videotaped deposition of SHAUN JAMES,
taken via videoconference before Mary M. Rocco,
Certified Shorthand Reporter and Registered
Professional Reporter, taken pursuant to the
provisions of the Illinois Code of Civil Procedure
and the Rules of the Supreme Court thereof
pertaining to the taking of depositions for the
purpose of discovery, commencing at 10:00 a.m. on
September 21st, 2021.

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1 APPEARANCES (via videoconference):

2 LOEVY & LOEVY

3 BY: SCOTT R. RAUSCHER, ESQUIRE

311 North Aberdeen Street, 3rd Floor
Chicago, Illinois 60607

4 Phone: 312.243.5900

5 E-mail: scott@loevy.com

6 On behalf of Plaintiffs Ben Baker,
7 Marcus Gibbs, Leonard Gipson, Allen Jackson,
8 Shaun James, Thomas Jefferson,
9 Anthony McDaniels, Andre McNairy,
Lee Rainey, Jamell Sanders, Frank Saunders,
Christopher Scott, Taurus Smith,
Henry Thomas, Phillip Thomas, Lionel White,
Jr., and Lionel White, Sr.;

10 LAW OFFICES OF KENNETH N. FLAXMAN, P.C.
11 BY: JOEL A. FLAXMAN, ESQUIRE

12 200 South Michigan Avenue, Suite 201
Chicago, Illinois 60604
13 Phone: 312.427.3200
E-mail: jaf@kenlaw.com

14 On behalf of Coordinated Plaintiffs;

15 HALE & MONICO, LLC

16 BY: ANTHONY E. ZECCHIN, ESQUIRE
53 West Jackson Boulevard, Suite 337
17 Chicago, Illinois 60604
Phone: 312.341.9646
18 E-mail: azecchin@halemonico.com

19 On behalf of One of the Defendant Officers;

20 JOHNSON & BELL, LTD.

21 BY: AHMED A. KOSOKO, ESQUIRE
33 West Monroe Street, Suite 2700
22 Chicago, Illinois 60603
Phone: 312.372.0770
23 E-mail: kosokoa@jbltd.com

24 On behalf of Defendant Ronald Watts;

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1 APPEARANCES (Via Videoconference - Continued):

2 RAVITZ & PALLE

3 BY: ERIC S. PALLE, ESQUIRE

4 203 North LaSalle Street, Suite 2100
Chicago, Illinois 60601

5 Phone: 312.558.1689

6 E-mail: epalles@ravitzpalles.com

7 On behalf of Defendant Kallatt Mohammed;

8

9 LEINEWEBER, BARONE & DAFFADA, LLC

10 BY: KEVIN E. ZIBOLSKI ESQUIRE

11 120 North LaSalle Street, Suite 2000
Chicago, Illinois 60602

12 Phone: 866.786.3705

13 E-mail: kevin@ilesq.com

14 On behalf of Coordinated Defendants;

15

16 REITER BURNS, LLP

17 BY: DHAVIELLA N. HARRIS, ESQUIRE

18 311 South Wacker Drive, Suite 5200
Chicago, Illinois 60606

19 Phone: 312.982.0090

20 E-mail: dharris@reiterburns.com

21 On behalf of Defendant City of Chicago
22 and all supervisory personnel.

23

24 Also Present (via videoconference):

Joe Beile, the Videographer

25

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27

28

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<p style="text-align: center;">Page 5</p> <p>1 THE VIDEOGRAPHER: This is Joe 2 Beile. I'm the host and the video recording 3 device operator. Counsel, do you want me to lock 4 the meeting just in case somebody drops?</p> <p>5 MR. ZECCHIN: I have no problem with 6 you not locking the meeting.</p> <p>7 THE VIDEOGRAPHER: So we are all 8 present, is that correct?</p> <p>9 MR. ZECCHIN: I believe so, yes.</p> <p>10 THE VIDEOGRAPHER: Mary, am I okay 11 to proceed? Are you ready?</p> <p>12 THE COURT REPORTER: Yes.</p> <p>13 THE VIDEOGRAPHER: For the record, 14 my name is Joe Beile, the video recording device 15 operator for this deposition. Our business address 16 is 134 North South Street, Suite 1400, Chicago, 17 Illinois 60602. This remote deposition is being 18 video recorded pursuant to the Federal Rules of 19 Civil Procedure and all other applicable rules.</p> <p>20 This is the deposition of Shaun 21 James being taken In Re: Watts Coordinated 22 Pretrial Proceedings, Case Number 19 CV 1717, in 23 the United States District Court for the Northern 24 District of Illinois, Eastern Division.</p>	<p style="text-align: center;">Page 7</p> <p>1 Plaintiff Shaun James, as well as the rest of the 2 plaintiffs that are represented by Loevy and Loevy 3 in the Watts Coordinated Proceedings. I am doing 4 this from the suburbs of Chicago.</p> <p>5 MR. FLAXMAN: This is Joel Flaxman. 6 I represent the Flaxman plaintiffs.</p> <p>7 MR. PALLE: Eric Palles. I am 8 calling from Chicago, and I represent Kallatt 9 Mohammed.</p> <p>10 MS. HARRIS: Dhaviella Harris, 11 calling from Chicago, and I represent the City of 12 Chicago and supervisory officers.</p> <p>13 MR. ZIBOLSKI: This is Kevin 14 Zibolski. I represent Defendants Spaargaren and 15 Cadman. I'm on the telephone in Chicago, 16 Illinois.</p> <p>17 MR. PALLE: You know, let me say 18 this, I note that Watts is not represented here. 19 Am I incorrect?</p> <p>20 MR. ZECCHIN: You know, I believe he 21 is doing this litigation. Let me shoot a quick 22 e-mail to Ahmed and see if we can get him on.</p> <p>23 THE VIDEOGRAPHER: Counsel, before 24 we introduce the court reporter and swear in the</p>
<p style="text-align: center;">Page 6</p> <p>1 Today's date is September 21st, 2 2021, and the time is 10:25 a.m.</p> <p>3 Will the witness please identify 4 yourself for the record by stating your name and 5 location, please.</p> <p>6 We can't hear him.</p> <p>7 THE WITNESS: My name is Shaun 8 James, and I'm at 13610 South Lowe Avenue, 9 Riverdale, Illinois 60827.</p> <p>10 THE VIDEOGRAPHER: This deposition 11 is being videorecorded at the instance of the 12 defendant and is being taken on behalf of the 13 defendant with the participants of this 14 videoconference.</p> <p>15 Please introduce yourselves for the 16 record by stating your name, location, and who you 17 represent, please.</p> <p>18 MR. ZECCHIN: This is Anthony 19 Zecchin on behalf of the individual defendant 20 officers in this case, other than Cadman and 21 Spaargaren. I'm in Chicago, Illinois, with Hale 22 and Monica.</p> <p>23 MR. RAUSCHER: Scott Rauscher with 24 Loevy and Loevy. I represent the witness,</p>	<p style="text-align: center;">Page 8</p> <p>1 witness, would you want to proceed with that, and 2 then go off the record? Or do you want to 3 proceed?</p> <p>4 MR. RAUSCHER: I would suggest we 5 just start. Even if they come on, they're not 6 going to be the first ones asking questions.</p> <p>7 THE VIDEOGRAPHER: Would the court 8 reporter please introduce themselves and please 9 swear in the witness?</p> <p>10 THE COURT REPORTER: I am Mary Rocco 11 with Royal Reporting Services.</p> <p>12 Would you please raise your right 13 hand?</p> <p>14 Do you solemnly swear the testimony 15 you are about to give shall be the truth, the 16 whole truth, and nothing but the truth, so help 17 you God?</p> <p>18 (No response.)</p> <p>19 THE COURT REPORTER: Could you say 20 that one more time? I didn't hear you.</p> <p>21 THE VIDEOGRAPHER: Yes, I think his 22 mic is off. I think he's muted.</p> <p>23 THE WITNESS: I said I do.</p> <p>24 THE VIDEOGRAPHER: Okay. There we</p>

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<p>1 go.</p> <p>2 MR. ZECCHIN: Okay. I e-mailed</p> <p>3 Ahmed. So hopefully he will jump on. If, for</p> <p>4 some reason, we are moving along, we can take a</p> <p>5 break, and I will try to reach him by phone. Are</p> <p>6 we ready to proceed?</p> <p>7 THE VIDEOGRAPHER: Yes.</p> <p>8 MR. ZECCHIN: This is the deposition</p> <p>9 of Shaun James in the case of Shaun James versus</p> <p>10 City of Chicago, et al. The case number is</p> <p>11 18 C 5128, which is also part of the In Re: Watts</p> <p>12 Coordinated Pretrial Proceedings,</p> <p>13 Case Number 19 C 01717.</p> <p>14 It's being taken pursuant to notice</p> <p>15 and subject to the Federal Rules of Civil</p> <p>16 Procedure as well as the local rules of the</p> <p>17 Northern District of Illinois.</p> <p>18 ---</p> <p>19 EXAMINATION</p> <p>20 BY MR. ZECCHIN:</p> <p>21 Q. Mr. James, have you been deposed</p> <p>22 before?</p> <p>23 A. Have I been deposed before?</p> <p>24 Q. Yes.</p>	<p>1 make it easier for both you and I, as well as the</p> <p>2 attorneys, and the court reporter, to take down</p> <p>3 what is being said. Okay?</p> <p>4 A. Yes.</p> <p>5 Q. The first rule is, because the court</p> <p>6 reporter is taking down what we say, and not</p> <p>7 nodding of the head or noises, you have to answer</p> <p>8 questions "Yes" or "No," if they call for a "Yes"</p> <p>9 or "No" answer. So, in other words, no "uh-huh"</p> <p>10 or "huh-uh," because those don't translate well to</p> <p>11 a transcript. So if an answer calls for a "Yes"</p> <p>12 or "No" response, just go ahead and say "Yes" or</p> <p>13 "No." Okay?</p> <p>14 A. Okay.</p> <p>15 Q. The second thing is sometimes you</p> <p>16 might -- this might get a little conversational,</p> <p>17 where we are just talking, and you might</p> <p>18 anticipate what my question is going to be and</p> <p>19 start answering it before I finish, and what that</p> <p>20 does is makes for a choppy transcript. So if you</p> <p>21 could do me a favor, and even if you know what I'm</p> <p>22 going to ask you, or you think you know what I'm</p> <p>23 going to ask you, if you could just wait until I</p> <p>24 finish my question, and then provide your answer,</p>
<p style="text-align: center;">Page 10</p> <p>1 A. What do you mean by "deposed"?</p> <p>2 Q. Okay. Well, today what is going to</p> <p>3 happen is you filed a lawsuit about two arrests</p> <p>4 that were made on you, and I'm going to be asking</p> <p>5 you questions about that lawsuit and about those</p> <p>6 arrests and other things, and you are going to be</p> <p>7 giving answers on the record.</p> <p>8 The court reporter is going to be</p> <p>9 taking down what I ask you, what you say, and what</p> <p>10 all the other attorneys say as well.</p> <p>11 You are under oath. You are subject</p> <p>12 to the same penalties for perjury if you lie on</p> <p>13 the witness stand. We'll be going back and forth.</p> <p>14 I will be asking you questions, and you will be</p> <p>15 providing answers. That is what a deposition is,</p> <p>16 and that's what we're here to do today. Do you</p> <p>17 understand that?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Okay. So I assume, since you didn't</p> <p>20 know what a deposition was, you have never been</p> <p>21 deposed before?</p> <p>22 A. No, sir.</p> <p>23 Q. Now, there are a few rules I am</p> <p>24 going to give you for this deposition that will</p>	<p style="text-align: center;">Page 12</p> <p>1 that would be much better down the road for this</p> <p>2 transcript, because it will be a lot cleaner. Is</p> <p>3 that okay?</p> <p>4 A. Yes, sir.</p> <p>5 Q. And likewise, if I start cutting</p> <p>6 your answer off, just tell me you are not</p> <p>7 finished, and I will stop and let you finish your</p> <p>8 answer completely. Okay?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Okay. If you don't understand a</p> <p>11 question that I have asked you, if I have asked it</p> <p>12 in a way that doesn't make sense, just go ahead</p> <p>13 and tell me that, and what I'll do is I will try</p> <p>14 to rephrase the question in a way that does make</p> <p>15 sense. Does that sound fair?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And if for some reason, if I do ask</p> <p>18 you a question, and you provide me with an answer,</p> <p>19 I'm going to assume you knew what I was asking you</p> <p>20 and you gave the answer that you intended to give.</p> <p>21 Okay?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. The last rule really is, if</p> <p>24 you need to take a break, you can take a break.</p>

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<p style="text-align: center;">Page 13</p> <p>1 It is a little strange being on Zoom, but if you 2 need to use the restroom or whatever, go ahead and 3 just let me know, and we can take a break. The 4 only rule with regard to that is if there is a 5 question that I have asked you, you need to answer 6 that question before we take that break. Okay? 7 A. Yes, sir. 8 Q. Now, is there any medication you are 9 on or any other condition you have that would 10 prevent you from testifying truthfully, 11 accurately, and completely today? 12 A. No, sir. 13 Q. You are not under the influence of 14 drugs or alcohol at this time; correct? 15 A. No, sir. 16 Q. So that's correct? 17 A. I'm not under the influence of drugs 18 or alcohol. 19 Q. Okay. So how did you -- so how did 20 you prepare for today's deposition? 21 A. Basically, just going to be honest 22 about the questions that's going to be asked. 23 Q. Well, what my question is actually 24 asking is, what did you do? Did you talk to your</p>	<p style="text-align: center;">Page 15</p> <p>1 14th, did you review any documents related to your 2 case? 3 A. Yes, sir. 4 Q. What did you review? 5 A. We went over my 2004 documents and 6 my 2007 documents. 7 Q. When you say "documents," are you 8 referring to Chicago police documents? 9 A. I don't think they were Chicago 10 police documents. I believe they were the reports 11 on how they was filing the lawsuit and what I had 12 said. 13 Q. And regarding your 2004 case, your 14 arrest in 2004, did you review any police reports 15 regarding that? 16 A. Yes, sir. 17 Q. Which reports do you remember 18 reviewing? 19 A. They sent me the whole report. 20 Q. Okay. Do you remember, was it an 21 arrest report? 22 A. Yes, it was an arrest report in 23 there, too. 24 Q. Was there a document that was kind</p>
<p style="text-align: center;">Page 14</p> <p>1 attorney -- don't tell me what you and your 2 attorney talked about. But did you talk to your 3 attorney about your deposition today? 4 A. Yes, sir. 5 Q. Okay. How many times did you 6 talk -- and is your attorney that you talked to 7 Mr. Rauscher, who is on this Zoom call as well? 8 A. Yes, sir. 9 Q. Was that via Zoom, or was that in 10 person? 11 A. That was via Zoom. 12 Q. Okay. Was there anybody else on 13 that Zoom call, that you are aware of, when you 14 had that conversation with Mr. Rauscher? 15 A. No, sir. 16 Q. When did this Zoom conversation take 17 place? 18 A. It took place on Zoom on 19 September 14th and September the 20th. 20 Q. On the 14th, how long did you talk 21 to Mr. Rauscher in preparation for your 22 deposition? 23 A. Maybe for about an hour. 24 Q. And during that Zoom call on the</p>	<p style="text-align: center;">Page 16</p> <p>1 of typed up a long way across the page as well 2 about your case in 2004? 3 A. Yes, sir. 4 Q. So you reviewed an arrest report and 5 that second document? Did you review any other 6 documents related to your 2004 arrest, any 7 reports? 8 A. No, sir. 9 Q. How about for your 2007 arrest, did 10 you review any reports for that arrest on the 14th 11 when you spoke with your lawyer? 12 A. Yes, sir. 13 Q. Which documents did you review on 14 the 14th regarding your 2004 arrest -- 2007 15 arrest, sorry. 16 A. We reviewed all the documents. 17 Q. The same type of documents you just 18 mentioned, the arrest report and that document 19 that runs across the page? 20 A. Yes, sir. 21 Q. Did you review any other documents 22 regarding your 2004 or 2007 arrest on the 14th, 23 when you met with your attorney? 24 A. No, sir.</p>

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<p style="text-align: right;">Page 17</p> <p>1 Q. Did you review any other documents 2 related to this lawsuit, such as your affidavit, 3 or any transcript or anything like that when you 4 met with your attorney on the 14th?</p> <p>5 A. Yes, sir.</p> <p>6 Q. What else did you review?</p> <p>7 A. My transcripts.</p> <p>8 Q. Are you referring to your 9 transcripts from your criminal cases?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Was it from your 2004 and your 2007 12 cases, or just one of the two?</p> <p>13 A. Both of them, sir.</p> <p>14 Q. Did you review the entire 15 transcript, your testimony and the plea? Or what 16 specifically do you recall reviewing regarding 17 transcripts?</p> <p>18 A. We went over the transcript and some 19 of the testimony, what was said, and like things 20 that -- of those nature, but not probably the whole 21 transcript.</p> <p>22 Q. Whose testimony do you remember 23 looking over?</p> <p>24 A. In the 2004 arrest, we went and</p>	<p style="text-align: right;">Page 19</p> <p>1 A. Not that I recall. Maybe some 2 medical records, but that was about it.</p> <p>3 Q. So you reviewed medical records on 4 the 14th of September?</p> <p>5 A. I believe so, yes. I believe my 6 lawyer sent me a copy of my medical records.</p> <p>7 Q. Did you look at any documents that 8 pertain to either of these arrests that were filed 9 after you were convicted of the 2004 and 2007 10 arrest? By that, I mean your affidavit you filed, 11 your post-conviction proceedings, or anything like 12 that?</p> <p>13 A. Yes. We had went over my affidavit 14 as well.</p> <p>15 Q. Anything else besides what we have 16 just mentioned did you review in preparation for 17 today's deposition?</p> <p>18 A. Not that I can recall, no.</p> <p>19 Q. Now, you also said you met with your 20 attorney on September 20th, which was yesterday; 21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. Was that, again -- was that just 24 Mr. Rauscher?</p>
<p style="text-align: right;">Page 18</p> <p>1 looked over -- I can't remember exactly whose 2 testimony we went over, but I believe we went over 3 everybody that was present, Watts, Mohammed, 4 Jones' testimony.</p> <p>5 Q. Did you look over your own testimony 6 in that case?</p> <p>7 A. Yes.</p> <p>8 Q. Now, just talking about your 2004 9 arrest, besides the reports and the transcript, 10 did you look at anything else related to that?</p> <p>11 A. No, sir. I can't recall. Not that 12 I recall.</p> <p>13 Q. How about your 2007 arrest, other 14 than your -- did you look at any transcripts 15 regarding your 2007 case?</p> <p>16 A. Yes, sir.</p> <p>17 Q. What transcript do you remember 18 reviewing from your 2007 case?</p> <p>19 A. The arrest report, what was said in 20 the motion, and just the testimony, my testimony 21 and the officers' testimony.</p> <p>22 Q. Did you look at any other reports or 23 any other transcripts or any other documents 24 regarding your 2007 arrest?</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Yes.</p> <p>2 Q. Was anybody else present on that 3 Zoom call?</p> <p>4 A. No, sir.</p> <p>5 Q. Let's step back. Was that a Zoom 6 call?</p> <p>7 A. Yes.</p> <p>8 Q. And how long did that meeting take 9 place with Mr. Rauscher yesterday?</p> <p>10 A. Maybe 30 to 45 minutes.</p> <p>11 Q. Did you review any documents during 12 that 30- to 45-minute conversation with your 13 attorney?</p> <p>14 A. No. He just wanted to make sure 15 that I had went over the documents that we talked 16 about --</p> <p>17 MR. RAUSCHER: Shaun, he doesn't 18 want to know what we talked about. He just asked 19 about documents you looked at.</p> <p>20 THE WITNESS: No, sir.</p> <p>21 BY MR. ZECCHIN:</p> <p>22 Q. Was anybody in the room with you on 23 either the 14th or 20th when you were talking to 24 your attorney?</p>

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<p>1 A. No, sir.</p> <p>2 Q. Have you talked to anybody else</p> <p>3 besides your attorney about your deposition today?</p> <p>4 A. No, sir.</p> <p>5 Q. Have you talked to Shaun -- I'm</p> <p>6 sorry -- Taurus Smith about your deposition?</p> <p>7 A. No, sir.</p> <p>8 Q. Did you ever talk to Crystal Looney</p> <p>9 about your deposition?</p> <p>10 A. No, sir.</p> <p>11 Q. How about Myeisha Smith?</p> <p>12 A. No, sir.</p> <p>13 MR. PALLES: Excuse me, you know,</p> <p>14 I'm having a really difficult time hearing the</p> <p>15 witness. May I ask, Mr. James, is your computer</p> <p>16 ratcheted up on the volume side for the speaker,</p> <p>17 or no?</p> <p>18 THE WITNESS: Yes, sir. It is all</p> <p>19 the way up.</p> <p>20 MR. PALLES: Okay. All right. It's</p> <p>21 the best we can do, I guess.</p> <p>22 BY MR. ZECCHIN:</p> <p>23 Q. Mr. James, how old are you?</p> <p>24 A. I'm 41 years of age.</p>	<p>1 Q. Owen?</p> <p>2 A. Edwin James.</p> <p>3 Q. How do you spell that?</p> <p>4 A. E-D-W-I-N.</p> <p>5 Q. How old is Edwin?</p> <p>6 A. 43.</p> <p>7 Q. Is he still living in Chicago or the</p> <p>8 Chicagoland area?</p> <p>9 A. Yes, sir.</p> <p>10 Q. What is your -- so you have a</p> <p>11 younger brother as well?</p> <p>12 A. No. I have another older brother.</p> <p>13 Q. Oh, another? Okay. So you said you</p> <p>14 are the middle child. Is that middle, including</p> <p>15 your sisters?</p> <p>16 A. Yes. I have two younger sisters.</p> <p>17 Q. What is your other older brother's</p> <p>18 name?</p> <p>19 A. D'Andre James.</p> <p>20 Q. How old is D'Andre?</p> <p>21 A. 42.</p> <p>22 Q. Is he living in Chicago or the</p> <p>23 Chicagoland area?</p> <p>24 A. Yes, sir.</p>
<p>1 Q. Do you have any family that's still</p> <p>2 living?</p> <p>3 A. Yes.</p> <p>4 Q. Who is still living? Is your mother</p> <p>5 and father alive?</p> <p>6 A. My mother is alive. I have got</p> <p>7 three brothers and two sisters, and I have 10</p> <p>8 children.</p> <p>9 Q. You have 10 children?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Is your mother still living in</p> <p>12 Chicago or the Chicagoland area?</p> <p>13 A. Yes, sir.</p> <p>14 Q. What is your mom's name?</p> <p>15 A. Debra James.</p> <p>16 Q. How do you spell Debra? There are</p> <p>17 different spellings.</p> <p>18 A. D-E-B-R-A.</p> <p>19 Q. Okay. And your brothers, you have</p> <p>20 three of them, you said?</p> <p>21 A. I have two brothers and two sisters.</p> <p>22 I'm the middle child.</p> <p>23 Q. What is your older brother's name?</p> <p>24 A. Edwin James.</p>	<p>1 Q. And your sisters, your first sister,</p> <p>2 what's her name?</p> <p>3 A. Latanya James.</p> <p>4 Q. Latanya?</p> <p>5 A. Yes, sir.</p> <p>6 Q. How old is Latanya?</p> <p>7 A. 40.</p> <p>8 Q. What's your other sister's name</p> <p>9 then?</p> <p>10 A. Lakisha James.</p> <p>11 Q. How old is Lakisha?</p> <p>12 A. 35.</p> <p>13 Q. Are Lakisha and Latanya -- do they</p> <p>14 live in Chicago or the Chicagoland area?</p> <p>15 A. They both stay in the suburbs.</p> <p>16 Q. Do you know a woman named Myeisha</p> <p>17 Smith?</p> <p>18 A. Yes, sir.</p> <p>19 Q. And what is your relationship with</p> <p>20 Myeisha Smith?</p> <p>21 A. My kids' mother.</p> <p>22 Q. How many of your 10 children is the</p> <p>23 mother Myeisha Smith?</p> <p>24 A. Five.</p>

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<p style="text-align: right;">Page 25</p> <p>1 Q. You don't need to give me their 2 names, but what's the age range of those five 3 children? 4 A. 22, 15, 10, and two 5-year-olds. 5 Q. Twins, I assume? 6 A. Yes. 7 Q. And is Myeisha Smith Taurus Smith's 8 aunt? 9 A. Yes. 10 Q. How long have you -- are you still 11 with Myeisha Smith? 12 A. Yes. 13 Q. How long have you been with Myeisha 14 Smith? 15 A. 23 years, off and on. 16 Q. Do you live with Myeisha Smith? 17 A. No, sir. 18 Q. Do you have a live-in girlfriend, 19 or -- first of all, I should say, are you married? 20 A. No, sir. 21 Q. Okay. Do you live by yourself? 22 A. No, sir. 23 Q. Who do you live with? 24 A. I stay with Crystal Looney.</p>	<p style="text-align: right;">Page 27</p> <p>1 22-year-old, of course, does she have full custody 2 of the ones who are not of the majority age? 3 A. Yes, sir. 4 Q. Even though you are living with 5 Crystal Looney, do you still have a good 6 relationship with Myeisha Smith? 7 A. Yes, sir. 8 Q. How often do you see her? 9 A. Maybe two to three, sometimes four 10 times out of the week, because I still coparent. 11 Q. And do you see -- when you are 12 getting together with Myeisha Smith, do you ever 13 see Taurus Smith? 14 A. No, not anymore. I have -- 15 Q. Why not? Go ahead. Finish your 16 sentence. 17 A. I haven't seen Taurus in quite a 18 while. The family got into it, and he doesn't 19 come over no more. Then me and him got into it 20 for a minute, so I haven't seen him for quite a 21 while. 22 Q. So Taurus Smith had an issue with 23 his family, so he wasn't seeing them, and then you 24 and Taurus Smith had an issue, and now you don't</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. With regard to the five children 2 that you have with my Myeisha Smith, do you 3 support them in any way? 4 A. Yes, sir. 5 Q. How do you support them? 6 A. Working. 7 Q. What are you currently doing for 8 employment? 9 A. I just got laid off. I was just a 10 call button at a meat factory in Lansing, 11 Illinois. I have been laid off for about 12 two-and-a-half weeks now. 13 Q. Prior to that, though, were you 14 providing -- what type of support were you 15 providing? Was it cash? Was it, you know, 16 custody help, or what were you doing to provide 17 support for those five children? 18 A. Helping out take care of the kids, 19 whatever they need financially, whether it was 20 money, or whether she needed me to take them to 21 school, whatever she basically needed me to do for 22 them. 23 Q. And does Myeisha Smith have full 24 custody of all five of them, except for the</p>	<p style="text-align: right;">Page 28</p> <p>1 see Taurus anymore? 2 A. Yes. Correct. 3 Q. When did you and Taurus have this 4 little issue come up? 5 A. Maybe a year ago. 6 Q. What was it related to? 7 A. He got into it with his family, and 8 it was Myeisha's house, and he got mad at me 9 because I wasn't stopping Myeisha from seeing 10 them, and then he just sucker punched me. 11 Q. Punched you in the face? 12 A. Yes. Yes, sir. I'm sorry. Yes, 13 sir. 14 Q. That's all right. So your beef with 15 Taurus had to do with his beef with his family? 16 A. Yes. I didn't have no beef with 17 him. I don't even know why he sucker punched me. 18 Q. And to your knowledge then, he 19 hasn't reconciled with his family? 20 A. Yes. They still beefing a little, 21 yes. 22 Q. So prior to this incident with 23 Taurus, when is the last time you saw him before 24 that?</p>

10 (Pages 25 to 28)

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<p style="text-align: center;">Page 29</p> <p>1 A. Maybe a couple of weeks before then, 2 because we was -- it was football. We was 3 watching the football games every Sunday. So it 4 was maybe a week prior to him sucker punching me. 5 Q. And you said now you are living with 6 Crystal Looney? 7 A. Yes, sir. 8 Q. Okay. How many children do you have 9 with Ms. Looney? 10 A. Three. 11 Q. Again, if you could just give me the 12 sex and the age of each of those children. You 13 don't have to give me their names. 14 A. 19, 16, and a 9-year-old. 15 Q. Do you have a boy, girl -- I mean, 16 two boys, two girls combination? 17 A. Two boys and one girl. 18 Q. Is the 19-year-old a boy or a girl? 19 A. Boy. 20 Q. And the 15-year-old, boy or girl? 21 A. She is 16. That's the girl. 22 Q. I should say a male or female since 23 they are getting up there. The 9-year-old, that's 24 a female?</p>	<p style="text-align: center;">Page 31</p> <p>1 A. No, sir. 2 Q. Do all of them live outside of the 3 Chicagoland area? 4 A. Yes, sir. They are located in 5 Springfield, Illinois. 6 Q. I know they are a little bit older 7 than some of your other children. Do you provide 8 support for them at all? 9 A. Yes, sir. 10 Q. What type of support do you provide 11 for them? 12 A. Financial support and just trying to 13 be a good role model, because they are of an age. 14 I try to support them finically, and then, you 15 know, they're doing good themselves. Both of them 16 are working. 17 Q. And your -- I forgot to ask you 18 about your three children with Ms. Looney. At 19 least they are all 19, 15, 16, and 9. Do you 20 provide financial support for them as well? 21 A. Yes. 22 Q. Has any of the support that you have 23 given by way of a court order, or has it always 24 been you have done it voluntarily?</p>
<p style="text-align: center;">Page 30</p> <p>1 A. A boy. 2 Q. A boy? Okay. So now, that's eight 3 children. So you have two additional children? 4 A. Yes. 5 Q. Who are the mothers -- the same mom 6 for both, or is it one for each? 7 A. It's the same female. 8 Q. Who is the mother of the last two? 9 A. Katrice Shells. 10 Q. How do you spell that? 11 A. K-A-T-R-I-C-E. 12 Q. Shells, like at the beach? 13 A. Yes. 14 Q. How old are the children that you 15 have with Ms. Shells? 16 A. My son is 21, and my daughter is 18. 17 Q. Do you still have a relationship 18 with those two children? 19 A. Yes, sir. 20 Q. Do you still have a relationship 21 with Ms. Shells? 22 A. Yes, sir. 23 Q. Do all of them still live in Chicago 24 or the Chicagoland area?</p>	<p style="text-align: center;">Page 32</p> <p>1 A. I have always done it voluntarily. 2 Q. Has there ever been a time you have 3 not provided financial support for any of your 4 children? 5 A. Yes, when I was incarcerated, when I 6 was out of employment. Yes, there have been times 7 I have been out of employment, yes. 8 Q. How often have you -- I guess, let's 9 start with after 2010. How often have you been 10 unemployed during 2010 to now? 11 A. Not that often. I keep a job. I 12 have had quite a few jobs. I keep a job. 13 Q. Okay. 14 A. Probably, maybe, a year, maybe a 15 year and a half, like, in chunks, not at the 16 same -- not a year, year and a half straight. 17 Like, a year and a half altogether in chunks. 18 Q. Okay. Thank you for explaining. 19 That makes sense. So do you and Ms. Looney -- 20 strike that. I want to take you back now to when 21 Ida B. Wells Homes were still in existence. Did 22 you ever live on the actual Ida B. Wells property? 23 A. Yes, a couple of times. 24 Q. Let's start with the first time.</p>

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<p style="text-align: center;">Page 33</p> <p>1 When was the first time you were living at 2 Ida B. Wells property? 3 A. I stayed over there at 730 East 39th 4 Street from when I was 12 years of age until I was 5 17. 6 Q. So what year would that have been? 7 A. From 1992 to 1997. That was the 8 first time I stayed over there. 9 Q. Okay. What was the second time you 10 stayed over there -- then after 1997, you moved 11 out of the Ida B. Wells Homes? 12 A. Yes, sir. 13 Q. Okay. Where did you move when you 14 left Ida B. Wells Homes? 15 A. My mother had moved to 68th and 16 Honore. 17 Q. So how long did you stay over there 18 with your mom at 68th and Honore? 19 A. For quite some while. I had got 20 Ms. Smith pregnant, and my mother had let me move 21 in with them. So maybe in 1999, I had moved back 22 into the Ida B. Wells housing projects. 23 Q. And when you moved back into 24 Ida B. Wells, you were living with Myeisha Smith's</p>	<p style="text-align: center;">Page 35</p> <p>1 A. Yes. 2 Q. Okay. So after 2001, where did you 3 move to? 4 A. I still was staying with Ms. Smith 5 and her mother. 6 Q. Did she move to a different building 7 on Ida B. Wells property, or did she move 8 somewhere else? 9 A. She moved to a different building on 10 Ida B. Wells property. 11 Q. Which building did she move to in 12 2001? 13 A. She moved to the row houses. 638 -- 14 I can't remember the exact address, but it was 15 East 38th Place. It was -- I can't remember the 16 exact address. 17 Q. Okay. It was the row houses over 18 there, not the high-rises? 19 A. Yes, it was the row houses, not the 20 high-rises. 21 Q. So that was 2001? And how long did 22 you stay living with Ms. Smith and her mom when 23 you moved in in 2001? 24 A. A year.</p>
<p style="text-align: center;">Page 34</p> <p>1 mom? 2 A. Yes. 3 Q. And, of course, Myeisha Smith lived 4 there as well? 5 A. Yes. 6 Q. So that was 1999. Which building 7 were you living in when moved back into 8 Ida B. Wells in 1999? 9 A. 706 East Pershing Road. 10 Q. You know, a lot of times, we see 11 people refer to, like, the 540 building, the 12 527 building. Was the 706 East Pershing Road, was 13 it referred to anything like that? Or was it just 14 known as the 706 East Pershing building? 15 A. The 706 building, the 730 building, 16 like the numbers that were on the building. 17 Q. How long were you living at 706 East 18 Pershing? 19 A. Ms. Smith's mother stayed there. 20 That was the last building to come down over 21 there, and she stayed there. She was one of the 22 last residents. I believe she moved in 2001. 23 Q. Were you there the whole time? From 24 '99 to 2001, were you still living there?</p>	<p style="text-align: center;">Page 36</p> <p>1 Q. So 2001 to 2002? 2 A. Yes. 3 Q. And in 2002, where did you move to 4 at that point? 5 A. I had caught a case. Ms. Smith's 6 mother kicked me out. So I was -- 7 Q. You can finish. 8 A. I'm sorry. 9 Q. Go ahead. You were speaking. Go 10 ahead and finish. 11 A. I had moved with my mother. I moved 12 back in with my mother. 13 Q. In 2002, when you caught a case, was 14 that -- what case was that that you caught in 15 2002? 16 A. It was a drug case. 17 Q. Was that in 2002? 18 A. Yes. I believe I didn't get 19 convicted until 2003. I was sentenced to boot 20 camp. 21 Q. Do you remember the officer that 22 arrested you on that case? 23 A. No, sir. 24 Q. It wasn't one of the officers you</p>

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<p style="text-align: center;">Page 37</p> <p>1 are suing in this litigation, is it?</p> <p>2 A. No, sir.</p> <p>3 Q. Okay. And you got boot camp on that</p> <p>4 case?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Were you -- strike that. So after</p> <p>7 you got kicked out by Ms. Smith and you went back</p> <p>8 to live with your mom, where was that at?</p> <p>9 A. That was still on 68th and Honore.</p> <p>10 Q. That's off Ida B. Wells property;</p> <p>11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. How far is 68th and Honore from</p> <p>14 Ida B. Wells, approximately?</p> <p>15 A. I don't know. Maybe 15 miles, if</p> <p>16 that. I don't know.</p> <p>17 Q. Okay. So when you moved back with</p> <p>18 your mom at 68th and Honore in 2002, how long did</p> <p>19 you stay living there?</p> <p>20 A. I stayed with my mother for quite a</p> <p>21 while then. I came home from boot camp, stayed</p> <p>22 with her, and then I had moved with my aunty.</p> <p>23 Q. Do you know approximately when you</p> <p>24 moved out of living with your mom to living with</p>	<p style="text-align: center;">Page 39</p> <p>1 A. No, sir.</p> <p>2 Q. You know, when I say, "Is that</p> <p>3 correct," if what I am saying is correct, then you</p> <p>4 would say, "Yes." So do you mean what I said was,</p> <p>5 in fact, correct?</p> <p>6 A. Yes.</p> <p>7 Q. How long did you live with your aunt</p> <p>8 at 70th and some intersection?</p> <p>9 A. All the way up until my</p> <p>10 incarceration.</p> <p>11 Q. And that's from your 2004 arrest?</p> <p>12 A. Yes.</p> <p>13 Q. When you -- after you -- we're going</p> <p>14 to go into this later about your case, but just to</p> <p>15 kind of wrap up where you lived at the time, after</p> <p>16 you were arrested and you pled guilty, did you</p> <p>17 continue to live with your aunt on 70th Street or</p> <p>18 70th Avenue?</p> <p>19 A. I don't believe I did. I don't</p> <p>20 believe I did. I believe I moved -- when I came</p> <p>21 home from my incarceration, I believe I didn't</p> <p>22 have nowhere to go, and my other aunty let me come</p> <p>23 there.</p> <p>24 Q. Which aunt would that be?</p>
<p style="text-align: center;">Page 38</p> <p>1 your aunty?</p> <p>2 A. Not exactly. Me and my mother had</p> <p>3 got into it, and she had put me out. I don't</p> <p>4 remember the exact time frame of it.</p> <p>5 Q. Was it a year, or was it a couple of</p> <p>6 years, would you say?</p> <p>7 A. Maybe a year, probably not even a</p> <p>8 whole year.</p> <p>9 Q. Okay. So that takes us to</p> <p>10 approximately 2003, give or take a few months; is</p> <p>11 that fair?</p> <p>12 A. Yes.</p> <p>13 Q. So then when you moved -- go ahead.</p> <p>14 A. No, I said, yes, sir.</p> <p>15 Q. So after you moved out of living</p> <p>16 with your mom at 68th and Honore, you moved in</p> <p>17 with your aunt. Which aunt was that?</p> <p>18 A. Mary Williams.</p> <p>19 Q. Where was your Aunt Mary Williams</p> <p>20 living at the time?</p> <p>21 A. It was on 70th and something. I</p> <p>22 can't recall the exact address.</p> <p>23 Q. It wasn't on Ida B. Wells property,</p> <p>24 though, is that correct?</p>	<p style="text-align: center;">Page 40</p> <p>1 A. Lanae Lesley.</p> <p>2 Q. How do you spell that? I'm sorry,</p> <p>3 your microphone cut out.</p> <p>4 A. Lanae Lesley, L-A-N-A-E.</p> <p>5 Q. Where was she living when you moved</p> <p>6 in with her?</p> <p>7 A. 78th and Champlain.</p> <p>8 Q. And 78th and Champlain, that's not</p> <p>9 part of Ida B. Wells; correct?</p> <p>10 A. Correct.</p> <p>11 Q. How long did you live with your aunt</p> <p>12 at 78th and Champlain?</p> <p>13 A. Until my incarceration. Maybe seven</p> <p>14 and a half months. Seven and a half months, to be</p> <p>15 exact.</p> <p>16 Q. The incarceration, are you referring</p> <p>17 to the violation of probation that sent you to the</p> <p>18 Department of Corrections?</p> <p>19 A. Yes. I believe it was a violation</p> <p>20 of parole. I was on parole at the time, from 2007</p> <p>21 to 2010.</p> <p>22 Q. Well, going back to your</p> <p>23 April 3rd, 2004 arrest, you originally got a</p> <p>24 sentence of 24 months of probation; correct?</p>

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<p style="text-align: center;">Page 41</p> <p>1 A. Correct.</p> <p>2 Q. And during that probation, did you</p> <p>3 violate the terms of your probation?</p> <p>4 A. Yes.</p> <p>5 Q. And that was before Judge Ford;</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. And when you -- did you plead guilty</p> <p>9 to that violation of probation?</p> <p>10 A. Yes.</p> <p>11 Q. Did Judge Ford sentence you to one</p> <p>12 year in the Illinois Department of Corrections?</p> <p>13 A. Yes.</p> <p>14 Q. Do you remember how much time you</p> <p>15 actually spent in the Illinois Department of</p> <p>16 Corrections, based on the one-year sentence in</p> <p>17 your credit?</p> <p>18 A. 61 days.</p> <p>19 Q. Did you have to serve the full 61</p> <p>20 days, or did you have any credit from being in the</p> <p>21 county that counted against that?</p> <p>22 A. No, I had to serve the whole 61</p> <p>23 days.</p> <p>24 Q. And that was on a one-year sentence;</p>	<p style="text-align: center;">Page 43</p> <p>1 2004, because that's when I got arrested again.</p> <p>2 Q. And that was the criminal drug</p> <p>3 conspiracy arrest you are talking about now?</p> <p>4 A. No.</p> <p>5 Q. Which arrest are you talking about</p> <p>6 getting in 2005 -- or 2004?</p> <p>7 A. When I came home from serving my 61</p> <p>8 days, that's when my first Sergeant Watts case</p> <p>9 occurred.</p> <p>10 Q. So you say you were arrested in 2005</p> <p>11 by Sergeant Watts?</p> <p>12 A. No.</p> <p>13 Q. So what are you -- were you arrested</p> <p>14 in 2005?</p> <p>15 A. I pleaded guilty in 2005. I was</p> <p>16 still incarcerated.</p> <p>17 Q. Was that -- what you pled guilty to,</p> <p>18 was that the criminal drug conspiracy?</p> <p>19 A. Yes.</p> <p>20 Q. And that was with regard to selling</p> <p>21 to an undercover officer, is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. And you had gotten a four-year</p> <p>24 Department of Corrections sentence; correct?</p>
<p style="text-align: center;">Page 42</p> <p>1 correct?</p> <p>2 A. Yes.</p> <p>3 Q. So after you were released from the</p> <p>4 Department of Corrections after serving 61 days,</p> <p>5 where did you live then?</p> <p>6 A. With Ms. Smith and her mother at</p> <p>7 540 East Browning.</p> <p>8 Q. Do you remember the approximate year</p> <p>9 that you were released from IDOC, that you moved</p> <p>10 in with Ms. Smith?</p> <p>11 A. It was 2004.</p> <p>12 Q. And that was, you said, -- you lived</p> <p>13 at the 540 East Browning address?</p> <p>14 A. Yes.</p> <p>15 Q. Didn't they call that the</p> <p>16 540 building at Ida B. Wells?</p> <p>17 A. Yes, sir.</p> <p>18 Q. How long did you live at the</p> <p>19 540 building with Ms. Smith and her mom?</p> <p>20 A. Maybe a few months after I came</p> <p>21 home.</p> <p>22 Q. So do you think you moved out of the</p> <p>23 540 building in 2005, or was it still in 2004?</p> <p>24 A. I can't recall. I believe it was in</p>	<p style="text-align: center;">Page 44</p> <p>1 A. Yes.</p> <p>2 Q. And you are saying you were already</p> <p>3 in custody when you pled guilty to that criminal</p> <p>4 drug conspiracy charge?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Okay. So in 2005, did you go right</p> <p>7 back into the Department of Corrections then?</p> <p>8 A. I came out for court. I went to</p> <p>9 court, and they sent me back to the penitentiary.</p> <p>10 I --</p> <p>11 Q. When is the next -- go ahead.</p> <p>12 A. I was just getting transferred back</p> <p>13 and forth from IDOC to Cook County Jail, backwards</p> <p>14 and forth.</p> <p>15 Q. For your court dates?</p> <p>16 A. Yes.</p> <p>17 Q. So after you pled to the criminal</p> <p>18 drug conspiracy, and you were sentenced back to</p> <p>19 IDOC, when then did you get released back, you</p> <p>20 know, into the world?</p> <p>21 A. In 2007. I don't remember the exact</p> <p>22 month it was. It was in 2007.</p> <p>23 Q. You do or you don't remember the</p> <p>24 month?</p>

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<p style="text-align: center;">Page 45</p> <p>1 A. I don't remember the month. 2 Q. When you were released in 2007, 3 where did you live at the time? 4 A. I stayed with my aunty on 78th and 5 Champlain. 6 Q. Then you were arrested again in 7 2007, in August, is that correct? 8 A. Yes, sir. 9 Q. Were you arrested at any point from 10 the time you were released from the penitentiary 11 in 2007, but prior to being arrested in August of 12 2007? 13 A. I can't recall if I was -- 14 Q. Do you remember -- go ahead. I'm 15 sorry. 16 A. I can't recall if I was. Maybe for 17 some misdemeanors. 18 Q. Do you remember being arrested on 19 April 1st, 2007, for a criminal trespass to land 20 at 540 East 36th Street? 21 A. Yes, I can recall that. 22 Q. And at the time, were you living at 23 143rd and LaSalle? 24 A. Yes. My aunty had -- I wasn't</p>	<p style="text-align: center;">Page 47</p> <p>1 Q. Is there any reason you didn't give 2 your 78th and -- I mean, your 143rd and LaSalle 3 address when you got arrested that time? 4 A. Because that one was too far, like 5 the police was, like, messing with me. I'm just, 6 like, man, I'm going right there. They was like, 7 "Where you going?" I said, "I'm going home." And 8 that was the closest address, probably, that I 9 came up with at the time. 10 Q. So you weren't staying there, but 11 5040 South Washington was close to where you were 12 stopped, and so you said that's where you were 13 going instead? 14 A. Yes. That's -- I had a room -- I 15 would go spend the night there maybe once or twice 16 out of the week. I wasn't staying there, though. 17 That wasn't, like, my address. 18 Q. It was just close in proximity to 19 where the police stopped you on August 2nd of 20 2007, so you said that's where you were staying, 21 so you could go close to where you were at? 22 A. Hopefully, they would let me go, 23 yes. 24 Q. Okay. And those are both</p>
<p style="text-align: center;">Page 46</p> <p>1 staying there. I paroled there. 2 Q. So that's the official address you 3 had when you were paroled out? 4 A. Yes. 5 Q. So did you stay with your aunt at 6 78th and Champlain the whole time after you were 7 released up until the time you were arrested in 8 August of 2007? 9 A. Yes, sir. 10 Q. Do you remember being arrested in 11 August of 2007 for possession of cannabis and some 12 traffic offenses? 13 A. Yes, sir. Probably, yes. I can't 14 remember off the top, but I believe I was. 15 Q. And, you know, at the time, were you 16 living at 5040 South Washington Park? 17 A. I wasn't staying there. I had just 18 used that address. 19 Q. So you did give that address as your 20 residence? 21 A. Yes. Someone else was staying 22 there. I wasn't staying there. They had invited 23 me to stay there, but I just spent the night here 24 and there. I wasn't, like, really staying there.</p>	<p style="text-align: center;">Page 48</p> <p>1 misdemeanor offenses or ordinance violations; 2 correct? 3 A. Yes. 4 Q. So after 2007 -- and we'll get into 5 this later, but just to kind of get your housing 6 history wrapped up, I think -- after 2007, the 7 arrest that you are suing on, after you got 8 released from the Department of Corrections, where 9 were you staying at that point? 10 A. In 2010? I can't remember where I 11 was staying when I came home in 2010. I believe 12 it was with my sister on 120th and Prairie. 13 Q. And that's not Ida B. Wells 14 property, is it? 15 A. Correct. 16 Q. Other than the times you have told 17 me that you stayed or lived in Ida B. Wells, is 18 there any other times you lived in Ida B. Wells 19 that you haven't mentioned to me so far? 20 A. Me and Ms. Looney, we stayed in 21 574 East Browning for a short period of time, but 22 that didn't last. And I was trying to remember 23 what year that was, but that didn't last long. 24 Q. Do you remember the year it was?</p>

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<p>1 A. I believe she was staying with her 2 friend when I came home, and I moved out to go 3 stay with Ms. Smith and her mother. I believe 4 this was in 2004.</p> <p>5 Q. And you don't -- do you remember how 6 long you stayed with Ms. Looney in the 7 574 building in 2004?</p> <p>8 A. Maybe about, like, a month and a 9 half, two months at the most.</p> <p>10 Q. And then you moved out and moved 11 back in with Ms. Smith and her mom?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And that was in the 540 building; 14 correct?</p> <p>15 A. Yes, sir.</p> <p>16 Q. Did you ever live in the 3800 block 17 of South Evans?</p> <p>18 A. Yes.</p> <p>19 Q. Do you have any more specific 20 information than that, like an actual address?</p> <p>21 A. 3810 South Evans.</p> <p>22 Q. Who were you living with at that 23 address?</p> <p>24 A. I used that address to parole home</p>	<p>1 A. No, sir.</p> <p>2 Q. What grade did you drop out in?</p> <p>3 A. 10th.</p> <p>4 Q. Why did you drop out?</p> <p>5 A. Just stopped going to school, and 6 hanging with my brothers. I just was hanging with 7 some older guys.</p> <p>8 Q. You know, at the time you dropped 9 out of high school, did you know Myeisha Smith at 10 that time?</p> <p>11 A. No.</p> <p>12 Q. So you met her after high school 13 age?</p> <p>14 A. Yes. Three years down the line, 15 yes.</p> <p>16 Q. Did you ever go back and get your 17 GED at any time you were incarcerated, or out of 18 custody, just, you know, like at a community 19 college or anything like that?</p> <p>20 A. I have attended schools, but I 21 haven't accomplished -- achieved in getting it.</p> <p>22 Q. Okay. Back when you were living at 23 Ida B. Wells, or when you were in high school, 24 were you ever in a gang?</p>
<p style="text-align: center;">Page 50</p> <p>1 to. That was Ms. Smith's mother's address before 2 she passed.</p> <p>3 Q. Did you ever actually stay there, or 4 did you say you used it for parole?</p> <p>5 A. I used it for parole. I had spent 6 quite a few nights there, but actually living 7 there, no. I used the address for parole.</p> <p>8 Q. So when you say you stayed there, 9 not living, you didn't pay rent, or you didn't 10 have your name on a lease or a deed or anything 11 like that; correct?</p> <p>12 A. Correct.</p> <p>13 Q. And how long -- well, never mind. 14 If you stayed there, it's, like, off and on; 15 correct?</p> <p>16 A. Yes.</p> <p>17 Q. And you said earlier you live in 18 Riverdale now. Have you lived in Riverdale since 19 you were released from custody?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Now, where did you go to high 22 school at?</p> <p>23 A. Wendell Phillips.</p> <p>24 Q. Did you ever finish high school?</p>	<p style="text-align: center;">Page 52</p> <p>1 A. Yes.</p> <p>2 Q. What gang were you in?</p> <p>3 A. The Gangster Disciples.</p> <p>4 Q. Did you have a rank in there, or 5 were you just a soldier?</p> <p>6 A. Just a soldier.</p> <p>7 Q. What territory was the Gangster 8 Disciples faction that you were involved in when 9 you were in it?</p> <p>10 A. In the Ida B. Wells.</p> <p>11 Q. What years was that that you were in 12 the Gangster Disciples?</p> <p>13 A. From 1992 to 2010.</p> <p>14 Q. Did you maintain active membership 15 that whole time?</p> <p>16 A. Yes.</p> <p>17 Q. And in 2010, what made you decide to 18 stop being a member of the Gangster Disciples?</p> <p>19 A. Everything had changed when I came 20 home. It wasn't worth it no more.</p> <p>21 Q. And at the time, you were 30?</p> <p>22 A. In 2010? Yes.</p> <p>23 Q. Okay. Now, I want to ask you some 24 questions first about your April 3rd, 2004 arrest.</p>

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<p>1 Okay?</p> <p>2 A. Yes.</p> <p>3 Q. Do you remember what day of the week that was?</p> <p>4 A. No, sir, not off the bat.</p> <p>5 Q. At the time in 2004, were you living at Ida B. Wells property?</p> <p>6 A. I believe I was. I can't recall the 7 exact address, but I believe I was. I believe I 8 was in 540 with Ms. Smith and her mother.</p> <p>9 Q. At that time, would you have been 10 living at 6620 South Union, perhaps?</p> <p>11 A. No.</p> <p>12 Q. Did you ever stay at that address?</p> <p>13 A. No.</p> <p>14 Q. Did you ever give that address to 15 law enforcement as your residence?</p> <p>16 A. Yes.</p> <p>17 Q. Why did you give that address as 18 your residence if you weren't living at that 19 address?</p> <p>20 A. That was Taurus Smith's mother's 21 house.</p> <p>22 Q. Okay. So you gave that address</p>	<p>1 A. Gambling.</p> <p>2 Q. Were you selling drugs at that time?</p> <p>3 A. No, sir.</p> <p>4 Q. Other than -- so your gambling -- you made enough money gambling to support yourself?</p> <p>5 A. Not all the time, but sometimes, 6 yes.</p> <p>7 Q. So what would you do when you didn't 8 make enough money gambling to support yourself?</p> <p>9 A. There wasn't nothing I could do. I 10 had to learn to go without.</p> <p>11 Q. What was that?</p> <p>12 A. There wasn't nothing I could do. I 13 had to learn to go without.</p> <p>14 Q. Okay. So your testimony is that you 15 were not selling drugs in 2004?</p> <p>16 A. No, sir.</p> <p>17 Q. Were you selling drugs in 2003?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Were you selling drugs in 2002?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Where were you selling drugs in 22 2002?</p>
<p>1 because it was Taurus Smith's mother's house?</p> <p>2 A. Yes. I --</p> <p>3 Q. Why would you give -- go ahead.</p> <p>4 Sorry. You can finish.</p> <p>5 A. I used to do a lot of lying to the 6 police when I was younger.</p> <p>7 Q. So is it possible you gave that 8 address when you were arrested in 2004?</p> <p>9 A. I can't remember what year I gave 10 them that address.</p> <p>11 Q. So at the time then, you said you 12 believe you were living, actually, or staying in 13 the 540 building?</p> <p>14 A. Yes. I believe I was staying with 15 Ms. Smith and her mother.</p> <p>16 Q. Do you remember what time of day you 17 were arrested at?</p> <p>18 A. I believe it was in the morning, 19 close to the afternoon.</p> <p>20 Q. At the time in 2004, did you have a 21 job?</p> <p>22 A. No, sir.</p> <p>23 Q. So what were you doing to support 24 yourself or to have money in your pocket?</p>	<p>1 A. On East 38th Place in Ida B. Wells 2 housing complex, over there somewhere.</p> <p>3 Q. Is there a specific building you 4 were selling out of?</p> <p>5 A. That wasn't a building. Those was 6 the row houses.</p> <p>7 Q. So you were just selling in the area 8 around there?</p> <p>9 A. Yes.</p> <p>10 Q. What were you selling at that time 11 in 2002? What type of drugs?</p> <p>12 A. In 2002, I believe it was heroin.</p> <p>13 Q. Any cocaine or crack cocaine?</p> <p>14 A. No.</p> <p>15 Q. Were you using drugs at that time?</p> <p>16 A. Marijuana.</p> <p>17 Q. But no heroin or no cocaine?</p> <p>18 A. No, sir.</p> <p>19 Q. In 2003, where were you selling 20 drugs at?</p> <p>21 A. Around the same area.</p> <p>22 Q. Can you give me that address again?</p> <p>23 I'm sorry.</p> <p>24 A. That was over on 638 -- probably on</p>

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<p>1 38th Place. Not 38th Street, on 38th Place.</p> <p>2 Q. So you said on 638 East 38th Place?</p> <p>3 A. Yes.</p> <p>4 Q. And what were you selling in 2003?</p> <p>5 A. Heroin.</p> <p>6 Q. No cocaine?</p> <p>7 A. No, sir.</p> <p>8 Q. And at the time, the only drugs you were using were marijuana?</p> <p>9 A. Yes, and occasionally drinking then.</p> <p>10 Q. Okay. So you said you weren't selling drugs in 2004?</p> <p>11 A. No.</p> <p>12 Q. Okay.</p> <p>13 A. Not in 2004.</p> <p>14 Q. Okay. Now, what do you remember about the April 3rd, 2004? What is the first thing you did that day, that you can remember?</p> <p>15 A. I got up and left Myeisha Smith's mother's house, and that was in 540 building, and I went over to the 574 building.</p> <p>16 Q. Why did you go over to the 574 building?</p> <p>17 A. Because that was the building that I</p>	<p>1 A. No, Taurus had pulled up.</p> <p>2 Q. When you say "pull up," do you mean pull up in a car, or do you mean walk?</p> <p>3 A. Oh, yes -- no, he had pulled up in a car. He had got dropped off to the building.</p> <p>4 Q. Okay. Did you know Taurus was going to be there, or did he just happen to show up at the same place you were at?</p> <p>5 A. No, that was the hangout spot. They was known for having all the money and the girls, and they did a lot of gambling over there.</p> <p>6 Q. So the 574 building had the girls and the gambling going on over there?</p> <p>7 A. Yes.</p> <p>8 Q. Were they selling drugs out of the 574 building as well?</p> <p>9 A. Yes.</p> <p>10 Q. What type of drugs were being sold out of there?</p> <p>11 A. I believe heroin and cocaine.</p> <p>12 Q. Do you know who was selling the drugs at that time?</p> <p>13 A. Not off the top, no.</p> <p>14 Q. And even by way of nickname, do you</p>
<p style="text-align: center;">Page 58</p> <p>1 had -- and they do a lot of gambling over there.</p> <p>2 Q. I heard "gambling," but your audio</p> <p>3 started bouncing in and out. Could you repeat</p> <p>4 that, please?</p> <p>5 A. That was the building they had the</p> <p>6 most money in, and they was doing the most</p> <p>7 gambling over there.</p> <p>8 Q. Do you remember about when you got</p> <p>9 over there to the 574 building?</p> <p>10 A. Maybe 8:00 something in the morning,</p> <p>11 close to 9:00. Maybe 8:00 or a little after 9:00</p> <p>12 in the morning.</p> <p>13 Q. Did you meet up with anybody over</p> <p>14 there?</p> <p>15 A. Yes. I met up with Taurus Smith and</p> <p>16 quite a few more people there. Tyrone, Batman,</p> <p>17 Birmingham. I met up with quite a few people. I</p> <p>18 can't recall who all was out there.</p> <p>19 Q. Did you meet up with Taurus soon</p> <p>20 after you got over to the 574 building somewhere</p> <p>21 between 8:00 and 9:00 in the morning?</p> <p>22 A. Yes. When he had pulled up, yes.</p> <p>23 Q. Taurus had pulled up, or you had</p> <p>24 pulled up?</p>	<p style="text-align: center;">Page 60</p> <p>1 know the nickname of the person selling drugs over</p> <p>2 there at that time, or persons selling drugs?</p> <p>3 A. Not off the top, no.</p> <p>4 Q. So when you got over there between</p> <p>5 9:00 in the morning, did you get involved in the</p> <p>6 dice game?</p> <p>7 A. Yes. I'm a known gambler down</p> <p>8 there, yes.</p> <p>9 Q. How long did you end up playing for</p> <p>10 that day?</p> <p>11 A. They booked me that day. Maybe</p> <p>12 about an hour, two hours we messed around. They</p> <p>13 got the best of me that day.</p> <p>14 Q. So when you say they booked you,</p> <p>15 that means they were winning, and you weren't</p> <p>16 winning, is that right?</p> <p>17 A. Yes.</p> <p>18 Q. So you say you played for about an</p> <p>19 or so, did you say?</p> <p>20 A. Yes, close to two hours.</p> <p>21 Q. Was Taurus Smith playing as well, or</p> <p>22 just you?</p> <p>23 A. No, Taurus wasn't no gambler back</p> <p>24 then. He would just sit there and watch the dice</p>

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<p>1 game. Probably sat back.</p> <p>2 Q. How many guys were playing dice that</p> <p>3 day when you were over there rolling?</p> <p>4 A. The dice games be the biggest.</p> <p>5 Everybody came in and shoot dice. It was big.</p> <p>6 Q. When you say "big," do you mean more</p> <p>7 than 10 people?</p> <p>8 A. Maybe 10 to 15 people.</p> <p>9 Q. Is this one dice game going on, or</p> <p>10 are there little dice games taking place all over</p> <p>11 by that area?</p> <p>12 A. I mean, this building is one big</p> <p>13 dice game going on. It may be dice games going on</p> <p>14 in other buildings or in the row houses; but in</p> <p>15 this building, it's one big dice game going on in</p> <p>16 the lobby.</p> <p>17 Q. So are they playing inside the</p> <p>18 building or outside of the building?</p> <p>19 A. They was inside the building</p> <p>20 shooting the dice.</p> <p>21 Q. And you said inside the lobby of the</p> <p>22 building?</p> <p>23 A. Yes.</p> <p>24 Q. Now, I have a question about the</p>	<p>1 building. There was this guy in front of the</p> <p>2 building, and he pulled in, and then my homey</p> <p>3 Tywon Birmingham called, and we was on the side of</p> <p>4 the building at his truck, and I was talking to</p> <p>5 him, and he was like, "Man, they finally got you."</p> <p>6 You know, we was just messing around.</p> <p>7 Q. And that's Tyrone Birmingham?</p> <p>8 A. Yes, Tywon Birmingham.</p> <p>9 Q. Oh, Tywon, okay. Do you remember</p> <p>10 anyone anybody else who was playing dice up there,</p> <p>11 either by their name or by their nickname?</p> <p>12 A. It was -- I can't remember everybody</p> <p>13 that was there. It was so long.</p> <p>14 Q. Sure. Were there any females</p> <p>15 rolling dice, or was it just males?</p> <p>16 A. It was a few females out there.</p> <p>17 Only one of them was playing, though. What's that</p> <p>18 girl's name, man? Vanessa.</p> <p>19 Q. Vanessa?</p> <p>20 A. Yes.</p> <p>21 Q. Do you happen to know Vanessa's last</p> <p>22 name at all?</p> <p>23 A. No, I don't know her last name.</p> <p>24 Q. So at some point, police pull up.</p>
<p style="text-align: center;">Page 62</p> <p>1 574 building. Is this one of those buildings</p> <p>2 where you have, like, two steps, and then you</p> <p>3 have, like, the lobby level?</p> <p>4 A. No, it's more than two steps. It is</p> <p>5 maybe four to five steps, and then you're at the</p> <p>6 lobby level.</p> <p>7 Q. So is it fair to say the lobby level</p> <p>8 is the first actual level you can walk on in the</p> <p>9 574 building?</p> <p>10 A. Yes, once you get up the steps, yes.</p> <p>11 You come in, and that's the lobby as soon as you</p> <p>12 come through the front door.</p> <p>13 Q. Is there a basement in the</p> <p>14 574 building?</p> <p>15 A. Yes.</p> <p>16 Q. Does anybody live in the basement,</p> <p>17 or is that, like, just for the storage and things</p> <p>18 like that?</p> <p>19 A. Didn't nobody have access to the</p> <p>20 basement but the CHA janitors.</p> <p>21 Q. So after you were playing dice for</p> <p>22 an hour or two, and they get the better of you,</p> <p>23 what do you do next?</p> <p>24 A. Me and Taurus, we walked out of the</p>	<p style="text-align: center;">Page 64</p> <p>1 Is that -- you have pled that in your complaint.</p> <p>2 Is that what happened?</p> <p>3 A. Yes. The police had hit the</p> <p>4 building.</p> <p>5 Q. So after you were rolling dice for</p> <p>6 an hour or two, how much longer after that did the</p> <p>7 police arrive on the scene?</p> <p>8 A. It could have been only a short</p> <p>9 time, because we just made it to the truck, and we</p> <p>10 were there for about 15 or 20 minutes.</p> <p>11 Q. So you get done rolling; about 15 to</p> <p>12 20 minutes later, that's when the police show up?</p> <p>13 A. Yes. The police cars were coming</p> <p>14 from everywhere.</p> <p>15 Q. When you were talking to Tywon</p> <p>16 Birmingham, is anybody else with you and Tywon</p> <p>17 when you were having that conversation?</p> <p>18 A. Taurus Smith, Harold Owens; he is</p> <p>19 deceased now, though. Little Charles was there.</p> <p>20 That's his nickname. I don't know his name.</p> <p>21 There was probably a few of us on the side of the</p> <p>22 building, just talking.</p> <p>23 Q. So now at this point, you are</p> <p>24 outside of the lobby of the 574 building, is that</p>

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<p style="text-align: center;">Page 65</p> <p>1 correct?</p> <p>2 A. Yes. We were on the side of the 3 building.</p> <p>4 Q. So you were at ground level, though?</p> <p>5 A. Yes.</p> <p>6 Q. So it's you, Taurus Smith, Tywon 7 Birmingham, Harold Owens, Little Charles. Was 8 there anybody else who was in this circle that you 9 were having this conversation with?</p> <p>10 A. Not that I can recall.</p> <p>11 Q. When the police pull up, how many 12 police cars pull up?</p> <p>13 A. It was a lot of them.</p> <p>14 Q. When you say "a lot of them," what 15 does that mean?</p> <p>16 A. They was hitting the front, they was 17 sitting the side of the building, they was coming 18 through the fields, they was coming up the one 19 way. It was a lot of detective cars.</p> <p>20 Q. So were there more than five?</p> <p>21 A. Maybe five or six. It couldn't have 22 been more than seven, though, because they had 23 covered everything.</p> <p>24 Q. And these police cars that pulled</p>	<p style="text-align: center;">Page 67</p> <p>1 cars, did anybody who was in the group playing 2 dice, or anybody else, yell anything or say 3 anything?</p> <p>4 A. All you heard was "clean up."</p> <p>5 Q. Why were they yelling "clean up"?</p> <p>6 A. Because all the police cars were 7 coming, and where they was coming.</p> <p>8 Q. So "clean up" doesn't necessarily 9 only mean clean up from drug sales; it can also be 10 for gambling?</p> <p>11 A. It is for everything.</p> <p>12 Q. So anything that is being done 13 that's illegal, when they want to stop doing it, 14 somebody would yell "clean up," is that accurate?</p> <p>15 A. Yes.</p> <p>16 Q. So after these officers arrived, did 17 any officers get out of their cars?</p> <p>18 A. Yes.</p> <p>19 Q. How far away were you from these 20 police cars when they first started getting out of 21 the vehicles?</p> <p>22 A. I was on the side of the building. 23 The closest car to me was the one that came to the 24 front of the building. That was maybe 15, 20 feet</p>
<p style="text-align: center;">Page 66</p> <p>1 up, what did they look like? Were they undercover 2 cars with no sirens or lights, or were they marked 3 squad cars?</p> <p>4 A. They were undercover cars.</p> <p>5 Q. Do you remember any of the colors 6 that they were?</p> <p>7 A. That sky blue one, that tan one. 8 They had two tan ones. They were everyday cars 9 they drove.</p> <p>10 Q. And you recognize those as police 11 cars from seeing them around Ida B. Wells?</p> <p>12 A. Yes.</p> <p>13 Q. These officers, you said they pulled 14 up from all different directions?</p> <p>15 A. Yes.</p> <p>16 Q. What did they do after they pulled 17 up? Did the officers get out of the cars?</p> <p>18 A. Yes. They got out of the cars, 19 people was running out of the building --</p> <p>20 Q. Were the officers -- I'm sorry, go 21 ahead and finish your thought.</p> <p>22 A. Yes, and also when they came, they 23 hopped out of the cars running.</p> <p>24 Q. When these officers got out of the</p>	<p style="text-align: center;">Page 68</p> <p>1 away.</p> <p>2 Q. How many people got out of that car?</p> <p>3 A. I can't recall how many officers got 4 out of that car.</p> <p>5 Q. Did you see any other officers get 6 out of their cars?</p> <p>7 A. I didn't see the ones on the back 8 get out of their cars. I only saw the ones that 9 was running in the front of the building get out 10 of their cars, because I was on the side of the 11 building.</p> <p>12 Q. So how many cars could you see from 13 where you were standing?</p> <p>14 A. Two.</p> <p>15 Q. How many officers got out of those 16 two cars?</p> <p>17 A. I can't recall.</p> <p>18 Q. Were there more than one officer in 19 each of those cars? Or do you not recall that 20 either?</p> <p>21 A. They never rode with just one 22 officer in each car. It's always more than one 23 officer in each car.</p> <p>24 Q. So there's at least two? Is there a</p>

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<p style="text-align: center;">Page 69</p> <p>1 chance there was three in each car?</p> <p>2 A. Two to three. That's how they</p> <p>3 always ride, maybe two to three officers in each</p> <p>4 car.</p> <p>5 Q. Did you recognize any of those</p> <p>6 officers that you saw get out of the cars 15 to 20</p> <p>7 feet away from you?</p> <p>8 A. The only one I recognized that got</p> <p>9 out of that first car was Mohammed.</p> <p>10 Q. Anybody else?</p> <p>11 A. I believe it was Jones and Mohammed.</p> <p>12 I can't recall exactly who got out of the car with</p> <p>13 who, or how they exactly hit the building.</p> <p>14 Q. Can you describe those officers at</p> <p>15 least? The ones besides -- you said Jones and</p> <p>16 Mohammed. You said those two. Can you name any</p> <p>17 other -- can you describe any other officers that</p> <p>18 you saw get out of those cars?</p> <p>19 A. Yes. That was the everyday team</p> <p>20 that he had back then. I believe Jay Bull was</p> <p>21 there. He didn't have the same team. He always</p> <p>22 switched his team up. I can't recall who all was</p> <p>23 there.</p> <p>24 Q. Did they appear to be African</p>	<p style="text-align: center;">Page 71</p> <p>1 corrupt?</p> <p>2 A. Yes.</p> <p>3 Q. Did you believe these officers who</p> <p>4 were pulling up were Watts or people who worked</p> <p>5 for Watts?</p> <p>6 A. He was the sergeant of the team.</p> <p>7 That's all I know. They used to call him their</p> <p>8 boss.</p> <p>9 Q. These officers that pulled up on the</p> <p>10 morning of April 3rd, 2004, did you believe that</p> <p>11 to be Watts and officers who worked for Watts?</p> <p>12 A. Yes.</p> <p>13 Q. And so even with your belief that</p> <p>14 they were corrupt, you still decided to stay put?</p> <p>15 A. I was at the truck, talking to my</p> <p>16 homey. I didn't come out of the building. I</p> <p>17 wasn't doing nothing.</p> <p>18 Q. Did you ever hear of people being</p> <p>19 falsely arrested, though?</p> <p>20 A. Yes.</p> <p>21 Q. But you decided to stay there, even</p> <p>22 though you thought Watts and his team were coming</p> <p>23 there and raiding the building, as you said;</p> <p>24 correct?</p>
<p style="text-align: center;">Page 70</p> <p>1 American, or did they appear to be Hispanic? Or</p> <p>2 what they -- what do you remember them?</p> <p>3 A. A mixture.</p> <p>4 Q. How many non-African Americans did</p> <p>5 you see that day?</p> <p>6 MR. RAUSCHER: Object to form. You</p> <p>7 can still answer.</p> <p>8 THE WITNESS: I can't recall, but I</p> <p>9 believe it was maybe three to four of them.</p> <p>10 BY MR. ZECCHIN:</p> <p>11 Q. Did you see any white officers</p> <p>12 there, or people who appeared to be white?</p> <p>13 A. Brian was there.</p> <p>14 Q. Brian?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know Brian's last name?</p> <p>17 A. No.</p> <p>18 Q. So when you see these cars pull up,</p> <p>19 what did you do?</p> <p>20 A. I didn't have to do nothing. I was</p> <p>21 on the side of the building.</p> <p>22 Q. I'm going to ask you some questions</p> <p>23 about your affidavit later; but in 2004, did you</p> <p>24 believe that Watts and the other officers were</p>	<p style="text-align: center;">Page 72</p> <p>1 A. You don't run. They going to get</p> <p>2 you if you run.</p> <p>3 Q. So they are going to get you if you</p> <p>4 stay put, they are going to get you if you run, so</p> <p>5 you don't do anything, is that correct?</p> <p>6 A. You got a better chance just staying</p> <p>7 put.</p> <p>8 Q. Did anybody that was standing with</p> <p>9 you, like Tywon Birmingham, Harold Owens, or</p> <p>10 Little Charles, did they run?</p> <p>11 A. None of us didn't run.</p> <p>12 Q. So all the people who were in that</p> <p>13 circle that you were talking to, which includes</p> <p>14 those people, plus Taurus Smith, you guys all</p> <p>15 stayed put on the side of the 574 building?</p> <p>16 A. We was on the side of the building.</p> <p>17 That's why we didn't run.</p> <p>18 Q. So did officers ultimately approach</p> <p>19 you?</p> <p>20 A. Yes.</p> <p>21 MR. ZECCHIN: You know, hey, Scott,</p> <p>22 I didn't get an e-mail back from Ahmed, and I</p> <p>23 don't see him on this call. I think since we're</p> <p>24 getting into the substance of the arrest, I think</p>

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<p>1 I would like to take a five-minute break so I can 2 reach out to at least make sure that he is 3 choosing not to be on here.</p> <p>4 MR. RAUSCHER: Yes, that's fine with 5 me.</p> <p>6 MR. ZECCHIN: Thanks a lot.</p> <p>7 THE VIDEOGRAPHER: We are now going 8 off the record at 11:39 a.m.</p> <p>9 (Whereupon, a brief recess is taken 10 at 11:39 a.m.)</p> <p>11 THE VIDEOGRAPHER: The time is 12 11:48 a.m. We are now back on the record.</p> <p>13 BY MR. ZECCHIN:</p> <p>14 Q. Mr. James, I think the last question 15 I asked you was, who were the first officers who 16 approached you on the side of the 574 building?</p> <p>17 A. It was Sergeant Watts and Officer 18 Jones.</p> <p>19 Q. And who else? Anybody else?</p> <p>20 A. No. He had other officers driving 21 the people that was running out of the building.</p> <p>22 Q. But I'm talking about specifically 23 the ones who approached you on the side of the 24 574 building. You said Watts and Jones. Anybody</p>	<p>1 there anybody else they took to the lobby of the 2 building?</p> <p>3 A. Yes.</p> <p>4 Q. Who else was taken to the lobby of 5 the building?</p> <p>6 A. There was a lot of people in the 7 lobby.</p> <p>8 Q. Okay. Let me go back, actually. 9 What I meant to ask was, when Watts and Jones took 10 the group -- the four of you to the lobby of the 11 building, did they take -- did they, Watts and 12 Jones, take anybody else to the lobby of the 13 building?</p> <p>14 A. No.</p> <p>15 Q. And you said there were a lot of 16 people in the lobby of the building?</p> <p>17 A. Yes.</p> <p>18 Q. How many is "a lot" that were in 19 the lobby of the building?</p> <p>20 A. I can't recall.</p> <p>21 Q. Were these the people who were 22 playing dice earlier?</p> <p>23 A. Yes.</p> <p>24 Q. Did you recognize any of those</p>
<p>1 else -- any other officers with them when they 2 approached you on the side of the building?</p> <p>3 A. No, sir.</p> <p>4 Q. And at that same time, it was still 5 Tywon Birmingham, Little Charles, and Harold Owens 6 still standing -- and Taurus Smith still standing 7 there as well?</p> <p>8 A. Yes, we all were standing there.</p> <p>9 Q. Did anybody -- did Watts or Jones 10 say anything to you at that time?</p> <p>11 A. Watts got to talking to Tywon 12 Birmingham. They got to laughing and joking, and 13 then that's when they escorted us to the building.</p> <p>14 Q. Okay. When you say "they," you are 15 talking Watts and Jones?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And you said "they escorted us." 18 Who is the "us" that you are talking about now?</p> <p>19 A. Me, Taurus, Harold, and Little 20 Charles.</p> <p>21 Q. And where do they take you?</p> <p>22 A. To the lobby of the building.</p> <p>23 Q. Okay. So besides the four of you 24 that they took to the lobby of the building, was</p>	<p>1 people who were in the lobby at that time?</p> <p>2 A. There was a lot of people that day.</p> <p>3 I can't recall that day.</p> <p>4 Q. Do you know somebody named Timothy 5 Connor?</p> <p>6 A. Probably not by their name. Maybe by 7 a nickname.</p> <p>8 Q. Did you see a person you know as 9 Timothy Connor, or by a nickname, did you see that 10 person in the lobby?</p> <p>11 MR. RAUSCHER: Object to form.</p> <p>12 THE WITNESS: I can't recall by that 13 name. If I know his name nickname, I maybe can 14 recall it.</p> <p>15 BY MR. ZECCHIN:</p> <p>16 Q. How about Tyrone Ferguson? Do you 17 know somebody by the name of Tyrone Ferguson?</p> <p>18 A. I know a lot of people by their 19 nicknames, not by their real names.</p> <p>20 Q. So you don't a person with the real 21 name Tyrone Ferguson?</p> <p>22 MR. RAUSCHER: Object to form.</p> <p>23 THE WITNESS: I don't know him by 24 his real name.</p>

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<p style="text-align: center;">Page 77</p> <p>1 BY MR. ZECCHIN:</p> <p>2 Q. So how about a person named Donnell</p> <p>3 Delaney? Do you know a person named Donnell</p> <p>4 Delaney?</p> <p>5 A. Yes.</p> <p>6 Q. Does Donnell Delaney have a</p> <p>7 nickname, that you know of, too?</p> <p>8 A. "D-low."</p> <p>9 Q. "D-low"?</p> <p>10 A. Yes.</p> <p>11 Q. How do you know "D-low"?</p> <p>12 A. My years of just being in the</p> <p>13 Ida B. Wells projects. Him and his brother, they</p> <p>14 used to have big old pit bulls.</p> <p>15 Q. They had the what?</p> <p>16 A. The big old pit bulls.</p> <p>17 Q. Oh, pit bulls?</p> <p>18 A. Yes. They --</p> <p>19 Q. What was his -- go ahead. Sorry.</p> <p>20 You can finish. Go ahead.</p> <p>21 A. They used to always walk a pit bull</p> <p>22 around, this big old vicious pit bull.</p> <p>23 Q. What was D-low's brother's name?</p> <p>24 A. I don't know his brother's name. I</p>	<p style="text-align: center;">Page 79</p> <p>1 you hear me correctly?</p> <p>2 A. Angelo Porter?</p> <p>3 Q. Yes.</p> <p>4 A. I can't recall them by that name.</p> <p>5 Q. But you know Angelo Porter, Junior</p> <p>6 and Senior, went by the nickname Ant-Low? Little</p> <p>7 Ant-Low and Big Ant-Low?</p> <p>8 A. Angelo Porter, that's the only thing</p> <p>9 I can come up with. They got to be Big Angelo or</p> <p>10 Little Angelo. I don't know any Angelo besides</p> <p>11 them two.</p> <p>12 Q. Do you know a father and son with</p> <p>13 the last name Shenault? Angelo Shenault?</p> <p>14 A. Probably --</p> <p>15 Q. Sorry. Go ahead.</p> <p>16 A. Probably by their nicknames.</p> <p>17 Q. Do you know of a person with the</p> <p>18 nickname Ant-Low who is actually Angelo Shenault?</p> <p>19 A. That is Ant-Low. I don't know the</p> <p>20 Angelo guy then. That is Ant-Low or his father.</p> <p>21 Q. So the person named Ant-Low, you</p> <p>22 know his last name is Shenault, not Porter;</p> <p>23 correct?</p> <p>24 A. I'm not quite for sure what his last</p>
<p style="text-align: center;">Page 78</p> <p>1 know his nickname is "Little Whan." I don't know</p> <p>2 his real name.</p> <p>3 Q. So "Little Whan"?</p> <p>4 A. Yes.</p> <p>5 Q. Did you see Donnell Delaney that day</p> <p>6 when you were out there throwing dice?</p> <p>7 A. I can't recall.</p> <p>8 Q. How about Angelo Porter? Does that</p> <p>9 name sound familiar to you?</p> <p>10 A. Angelo Porter?</p> <p>11 Q. Yes.</p> <p>12 A. Is that a senior or a junior?</p> <p>13 Q. I don't know. Do you know a Senior</p> <p>14 and a Junior Angelo Porter?</p> <p>15 A. I believe so.</p> <p>16 Q. Do they go by -- either Senior or</p> <p>17 Junior go by nicknames?</p> <p>18 A. "Big Ant-Low" and "Little Ant-Low."</p> <p>19 Q. Big Ant-Low and Little Ant-Low?</p> <p>20 A. Yes.</p> <p>21 Q. Is there anybody else at</p> <p>22 Ida B. Wells that went by the nickname Ant-Low?</p> <p>23 A. Not that I know of.</p> <p>24 Q. You know, I said Angelo Porter. Did</p>	<p style="text-align: center;">Page 80</p> <p>1 name is.</p> <p>2 Q. Okay. Do you know a person by the</p> <p>3 name of William Ford?</p> <p>4 A. Not by that name.</p> <p>5 Q. How about a Sheryl Fields?</p> <p>6 A. I know a lot of people by their</p> <p>7 nicknames, not by their government names.</p> <p>8 Q. If I know a nickname, I will tell</p> <p>9 you. All I have is government names. So I'm</p> <p>10 going to give you the government name, and if for</p> <p>11 some reason you know it, just let me know. Okay?</p> <p>12 But if I have a nickname, I will let you know.</p> <p>13 How about Leon Davis?</p> <p>14 A. That doesn't ring a bell.</p> <p>15 Q. Edward Drakeford?</p> <p>16 A. Not by that name.</p> <p>17 Q. How about Stacy McDowell?</p> <p>18 A. Not by that name.</p> <p>19 Q. Okay. So going back to the lobby of</p> <p>20 the 574 building, besides you, Tywon Birmingham,</p> <p>21 Little Charles, Harold Owens, and Taurus Smith, do</p> <p>22 you know anybody else who was in the lobby at that</p> <p>23 time, by their nickname even?</p> <p>24 A. That's been a while. I can't</p>

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<p style="text-align: center;">Page 81</p> <p>1 remember who all was in the building, and who all 2 was gone that day, and who all was in there. 3 Q. Do you remember any of them? 4 A. No, it's been a while ago. Not off 5 the top of my head. I can't remember who all was 6 in there. 7 Q. If you answered this before, I 8 apologize, but how many people besides you four 9 were in that lobby that had been brought in there 10 by the police? 11 A. There was a lot of people in the 12 lobby. 13 Q. More than 10? 14 A. Yes. 15 Q. More than 15? 16 A. Yes. 17 Q. More than 20? 18 A. There would have been maybe 20-some 19 people in that lobby that day. 20 Q. So in the lobby -- now, I'm talking 21 about specifically after you said Watts and Jones 22 brought you back in the lobby. Are we on the same 23 page as far as the time I'm asking you about? 24 A. Yes.</p>	<p style="text-align: center;">Page 83</p> <p>1 Q. There was one female officer there? 2 A. I can't recall how many female 3 officers was there, but he did have a female 4 officer on his team at the time. 5 Q. Well, I'm specifically referring to 6 this time on April 3rd, 2004, in the lobby. You 7 said there was one female officer there. I am 8 wondering if you can tell me, was there a second 9 female officer there? 10 A. I can't recall if it was another 11 female officer there, but they had a female 12 officer with him. He had a lot of officers with 13 him. 14 Q. So besides the one -- the one female 15 officer, can you describe her for me? 16 A. No, because me and Taurus was 17 arguing about this, and I had made a mistake 18 because I believe he had said it was Coco, and I 19 kept telling him it wasn't Coco, because I didn't 20 know her at that time. 21 Q. So you didn't believe it was Coco at 22 the time on April 3rd, 2004; you didn't believe it 23 was her? 24 A. I mean --</p>
<p style="text-align: center;">Page 82</p> <p>1 Q. So at this point then, there is 2 approximately 20 people, plus the four of you; so 3 there is 24 people, civilians, in the lobby at 4 this time. Is that accurate? 5 A. Maybe even more than that. The 6 lobby was packed. 7 Q. Okay. Could it have been more than 8 30? 9 A. I don't know. They had both sides 10 of the lobby packed. 11 Q. Okay. So while you were in the 12 lobby, did you have any conversation with 13 anybody -- strike that. Did you see any other 14 police officers in the lobby at that time? 15 A. It was -- I can't recall all the 16 officers there. There was officers up in there 17 holding other individuals. 18 Q. Did you recognize any of those other 19 officers? 20 A. I can't recall who all was there. 21 I know Mohammed was there, Jones was there, Watts 22 was there. They had female officers. I can't 23 recall who all was there. I know it was a lot of 24 them.</p>	<p style="text-align: center;">Page 84</p> <p>1 MR. RAUSCHER: Object to form. 2 BY MR. ZECCHIN: 3 Q. When your attorney objects, unless 4 he tells you not to answer, you can still answer 5 my question, Mr. James. 6 A. I don't believe that was Coco at the 7 time, because I didn't meet Coco until later on 8 down the line. He had -- yes, it was officers -- 9 a female officer there, but how many there was, I 10 can't recall, or which one it was, I can't recall. 11 Q. About how many other officers were 12 there in the lobby at that time? 13 A. It was quite a few of them, because 14 they had got a lot of people. I can't recall how 15 many officers that was actually there, but there 16 was quite a few officers there. 17 Q. When you say "quite a few", are 18 you talking more than five? 19 A. It could have been more than five, 20 yes. 21 Q. How about more than 10? 22 A. I don't know. I don't believe it 23 was more than 10. 24 Q. So somewhere between 5 and 10</p>

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<p style="text-align: center;">Page 85</p> <p>1 officers in that lobby there?</p> <p>2 THE COURT REPORTER: Excuse me, I'm</p> <p>3 sorry, my video froze. When Mr. James said</p> <p>4 somewhere between 5 and 10 officers, my video</p> <p>5 froze.</p> <p>6 MR. ZECCHIN: Okay.</p> <p>7 BY MR. ZECCHIN:</p> <p>8 Q. I guess I can paraphrase what I had</p> <p>9 asked you. So, Mr. James, is it fair to say it</p> <p>10 was between 5 and 10 officers that you believe</p> <p>11 were in the lobby at that time?</p> <p>12 A. (Inaudible.)</p> <p>13 Q. Was that a "Yes"? I'm sorry.</p> <p>14 A. Yes.</p> <p>15 Q. And when were you -- were you placed</p> <p>16 under arrest in that lobby?</p> <p>17 A. Not at that time.</p> <p>18 Q. So after you were brought into the</p> <p>19 lobby, you and those other people, what happens</p> <p>20 next?</p> <p>21 A. Sergeant Watts assigned some people</p> <p>22 to watch the lobby, and him and a few more</p> <p>23 officers went upstairs, I believe searching for</p> <p>24 things.</p>	<p style="text-align: center;">Page 87</p> <p>1 Watts?</p> <p>2 A. I can't recall how many he took with</p> <p>3 him.</p> <p>4 Q. Do you know any of the other</p> <p>5 officers who went with him, by name?</p> <p>6 A. I can't recall who all went with him</p> <p>7 up the stairs that day.</p> <p>8 Q. How long were they gone for?</p> <p>9 A. They was gone for a nice little</p> <p>10 minute.</p> <p>11 Q. How long is "a nice little minute"?</p> <p>12 A. I don't know, because people was</p> <p>13 leaning on the wall, people was kneeling down,</p> <p>14 smoking cigarettes. People was getting tired,</p> <p>15 because they was holding us up in there for a</p> <p>16 while. I don't know exactly how long it was.</p> <p>17 Q. And then Watts and these other</p> <p>18 officers returned to the lobby at some point?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Were you placed under arrest at that</p> <p>21 time?</p> <p>22 A. Not at that time.</p> <p>23 Q. So what happened after they got back</p> <p>24 to the lobby?</p>
<p style="text-align: center;">Page 86</p> <p>1 Q. You said he assigned some people to</p> <p>2 watch the lobby. Is that what you said?</p> <p>3 A. Yes.</p> <p>4 Q. Weren't you already in the lobby at</p> <p>5 that time?</p> <p>6 A. Yes. That is why he assigned</p> <p>7 officers to watch the lobby.</p> <p>8 Q. Can you describe the officers --</p> <p>9 strike that. What did he say to these officers to</p> <p>10 watch the lobby?</p> <p>11 A. He just said, "Hold them right</p> <p>12 here."</p> <p>13 Q. How many officers was he talking to</p> <p>14 when he said this?</p> <p>15 A. I can't recall how many officers</p> <p>16 that was there.</p> <p>17 Q. And are there still that 20 to 30</p> <p>18 other people in the lobby at this time?</p> <p>19 A. Yes. Everybody is still in the</p> <p>20 there at the time.</p> <p>21 Q. So then you said that Watts and</p> <p>22 other officers went upstairs?</p> <p>23 A. Yes.</p> <p>24 Q. How many other officers went with</p>	<p style="text-align: center;">Page 88</p> <p>1 A. Watts and Mohammed got to calling</p> <p>2 people into the hallway one by one. Watts opened</p> <p>3 the door. He was like, Man, send him up in here,</p> <p>4 and they'll get you up in there. I know what they</p> <p>5 did to me, and some other people told me that they</p> <p>6 did the same to them, too. They called us in</p> <p>7 there one by one. Mohammed strip searched you,</p> <p>8 and Watts asked you what was you doing in the</p> <p>9 building.</p> <p>10 Q. So where are they -- you said they</p> <p>11 were taking you in one by one. Where are they</p> <p>12 taking you to?</p> <p>13 A. In the first floor in the front</p> <p>14 hallway.</p> <p>15 Q. Where is the hallway in relation to</p> <p>16 the lobby?</p> <p>17 A. The lobby is right there. The front</p> <p>18 hallway door is right there. You come out of the</p> <p>19 front hallway, you're in the lobby.</p> <p>20 Q. You said Watts and Mohammed were</p> <p>21 taking people one by one into this hallway?</p> <p>22 A. Yes, sir.</p> <p>23 Q. So did they -- everybody was in that</p> <p>24 hallway the same way?</p>

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<p style="text-align: right;">Page 89</p> <p>1 A. No, sir, not everybody.</p> <p>2 Q. How many people were taken into this</p> <p>3 hallway?</p> <p>4 A. I don't know how many it was, but I</p> <p>5 know it was quite a few.</p> <p>6 Q. More than half of the people?</p> <p>7 A. I'm not going to say it was more</p> <p>8 than half of the people. It was the majority of,</p> <p>9 like, the young people.</p> <p>10 Q. And you can't give me an estimate of</p> <p>11 how many people that was, though?</p> <p>12 A. No, sir.</p> <p>13 Q. And, obviously, when they are being</p> <p>14 talked to in the hallway, you can't hear what is</p> <p>15 being discussed; right?</p> <p>16 A. No, sir.</p> <p>17 Q. Okay. So how long did this</p> <p>18 questioning of these people take place before you</p> <p>19 were placed under arrest?</p> <p>20 MR. RAUSCHER: Object to form.</p> <p>21 Foundation.</p> <p>22 THE WITNESS: It lasted for a</p> <p>23 minute, because everybody was trying to figure out</p> <p>24 what he was up to, and how long it lasted. I'm</p>	<p style="text-align: right;">Page 91</p> <p>1 Q. Then after you got back on the wall,</p> <p>2 what happened?</p> <p>3 A. He finished strip searching the</p> <p>4 people he was going to strip search. He came out</p> <p>5 there. He got to pulling at people, asking them,</p> <p>6 what you was doing in here, and he was like, "Man,</p> <p>7 go on and get up out of here." Man -- well, he</p> <p>8 was asking what you was doing in here. "How much</p> <p>9 money you got on you today?" He was telling</p> <p>10 people, like, "Man, you need to give me the money,</p> <p>11 or you can go to jail." Some people he was</p> <p>12 telling that to gave him the money, and he said,</p> <p>13 "All right, go on, get up out of here." I wasn't</p> <p>14 offered that chance.</p> <p>15 Q. So he never asked you to pay him,</p> <p>16 because you said you had no money?</p> <p>17 A. He never asked me to pay him that</p> <p>18 day. I wasn't offered to pay him that day.</p> <p>19 Q. Okay. So did he then just put cuffs</p> <p>20 on you?</p> <p>21 A. Yes. He told Jones, he said, "Man,</p> <p>22 what are we fixing to do?" He said, call the</p> <p>23 wagon; everybody else is gone.</p> <p>24 Q. At that point, did you get handcuffs</p>
<p style="text-align: right;">Page 90</p> <p>1 not sure exactly how long it lasted.</p> <p>2 BY MR. ZECCHIN:</p> <p>3 Q. And how did you get -- how did you</p> <p>4 end up getting placed under arrest? What</p> <p>5 happened, specifically?</p> <p>6 A. Because my lawyer, he told me.</p> <p>7 Q. What was that?</p> <p>8 A. Because my lawyer, he told me.</p> <p>9 Q. I don't understand what you mean.</p> <p>10 How did you get arrested?</p> <p>11 MR. RAUSCHER: Objection to form.</p> <p>12 BY MR. ZECCHIN:</p> <p>13 Q. Mr. James, did you believe when you</p> <p>14 had handcuffs put on you you were under arrest?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So what happened right before</p> <p>17 you got handcuffs put on you?</p> <p>18 A. He put me in the hallway, he asked</p> <p>19 me what I was doing in the building. I told him I</p> <p>20 was in the building gambling. He said, "How much</p> <p>21 money you got on you?" I said, "I ain't got no</p> <p>22 money. They busted me." He said, Man -- after</p> <p>23 they strip searched me, he said, "All right, go</p> <p>24 back out there and get on the wall."</p>	<p style="text-align: right;">Page 92</p> <p>1 put on you?</p> <p>2 A. Yes.</p> <p>3 Q. Other than what you have testified</p> <p>4 to already, did anybody say -- did any police</p> <p>5 officer say anything else to you while you were in</p> <p>6 the lobby of the 574 building?</p> <p>7 A. Not that I can remember -- not that</p> <p>8 I can remember.</p> <p>9 Q. You know, I think your -- at least</p> <p>10 on my end, the audio started going in and out. So</p> <p>11 maybe you could repeat that answer.</p> <p>12 A. I said, not that I can remember once</p> <p>13 they got done cuffing us up, not that I can</p> <p>14 remember.</p> <p>15 Q. Okay. You said they brought a wagon</p> <p>16 to the 574 building, the police did?</p> <p>17 A. Yes.</p> <p>18 Q. So how many people were taken out to</p> <p>19 that wagon?</p> <p>20 A. Everybody got in the wagon except</p> <p>21 for me.</p> <p>22 Q. So how many people was that that</p> <p>23 were taken to the wagon? You said some of them</p> <p>24 were let go. How many were not let go and were</p>

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<p>1 taken and were put in that police wagon?</p> <p>2 A. I believe it was about like 12 or 13</p> <p>3 of us got arrested that day. So maybe about 12 of</p> <p>4 them was in the wagon.</p> <p>5 Q. Where were you taken to?</p> <p>6 A. Watts and Jones took me in the blue</p> <p>7 detective car.</p> <p>8 Q. Was it just you -- Watts, and Jones,</p> <p>9 and you were the only people in the car?</p> <p>10 A. Yes. Jones was driving the car.</p> <p>11 Watts was in the passenger seat.</p> <p>12 Q. And you were in the back seat; correct?</p> <p>13 A. Yes.</p> <p>14 Q. And nobody else was in the car, just you?</p> <p>15 A. Just me, Watts, and Jones.</p> <p>16 Q. Okay. You were you taken back to the police station after that?</p> <p>17 A. Yes.</p> <p>18 Q. So when you got back to the police station, what happened? Were you processed?</p> <p>19 A. No. We didn't even know what we was</p> <p>20 going to be charged with when we got to the police</p>	<p>1 Looney at the police station?</p> <p>2 A. When he brought her in the door.</p> <p>3 Q. What room was this in where you saw her at?</p> <p>4 A. It is a holding room they had in the</p> <p>5 Ida B. Wells complex back then. They had a little</p> <p>6 station over there, the Chicago police.</p> <p>7 Q. So this is -- go ahead.</p> <p>8 A. The station they took us to was in</p> <p>9 the Ida B. Wells housing complex at the time.</p> <p>10 Q. So this wasn't at 51st and Wentworth?</p> <p>11 A. No. No, sir.</p> <p>12 Q. Okay. So did you have a conversation with Crystal Looney when she came to that station?</p> <p>13 A. No. While he was telling me in</p> <p>14 front of everybody how it was fixing to do down if</p> <p>15 I didn't give him the money or the information</p> <p>16 that he was looking for, and he told me he was</p> <p>17 going to frame Crystal with it.</p> <p>18 Q. How many people were -- you said he said this in front of everybody. When you say "everybody," are you talking about the other</p>
<p>1 station. Didn't nobody know what was going on, what we was going to be charged with, and people was hooping and hollering, hooping and hollering. And he cut some more people a break at the station, and then he told Al who all was getting booked for felonies.</p> <p>2 Q. Did you see anybody -- I'm sorry. Go ahead. I didn't mean to cut you off.</p> <p>3 A. That's basically how it went. He told Al to start the paperwork. He told him who was getting felonies and who was getting misdemeanors.</p> <p>4 Q. Did anybody else, besides the people who came back in the paddy wagon and you, show up at the police station while you were there?</p> <p>5 A. Yes.</p> <p>6 Q. Who was there?</p> <p>7 A. My kids' mother. He left the station and went and got my kids' mother and brought her to the station.</p> <p>8 Q. You are talking about Crystal Looney; correct?</p> <p>9 A. Yes.</p> <p>10 Q. Where did you first see Crystal</p>	<p>1 people who were arrested that day?</p> <p>2 A. Yes.</p> <p>3 Q. So how many people in this room, civilians and other -- strike that. Were any other police officers in the room when he said this to you?</p> <p>4 A. Yes.</p> <p>5 Q. Who else was in the room?</p> <p>6 A. All of the officers that came to the building with him. I can't recall all the officers that was there. But all the officers that came to the building with him, they all was sitting down, doing paperwork.</p> <p>7 Q. And how many officers was that?</p> <p>8 A. I can't recall how many of them was there.</p> <p>9 Q. How many -- can you describe any of those officers?</p> <p>10 A. I know Jones and Mohammed was there. I believe Jay Bull was there. I can't recall who all was there that day. But he had a whole different team.</p> <p>11 Q. So other than the people you just named, you can't name anybody who else was there</p>

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<p style="text-align: center;">Page 97</p> <p>1 by name, is that correct?</p> <p>2 A. I believe Young was there. I'm not</p> <p>3 sure, though. I can't name nobody else by name,</p> <p>4 correct.</p> <p>5 Q. So how many officers are we up to</p> <p>6 that are in the room?</p> <p>7 A. I can't tell you exactly how many</p> <p>8 officers was in the room.</p> <p>9 Q. And you said there was also these</p> <p>10 other people who got arrested in the same room?</p> <p>11 A. Yes.</p> <p>12 Q. So that's -- correct me if I'm</p> <p>13 wrong, Mr. James, but I believe you said it was</p> <p>14 about 15 other people who were taken into the</p> <p>15 station that day?</p> <p>16 A. About 12 or 13.</p> <p>17 Q. Okay. So in this room now, you have</p> <p>18 approximately 17 people in there when Watts is</p> <p>19 allegedly saying this to you, is that correct?</p> <p>20 A. Probably more than that, because it</p> <p>21 was about 12 or 13 of us, and it was more than</p> <p>22 three or four officers in there. I just can't</p> <p>23 recall all the officers that was there.</p> <p>24 Q. So did you ever have a conversation</p>	<p style="text-align: center;">Page 99</p> <p>1 A. Yes, Harold and Little Charles went</p> <p>2 to the station, but they was cut a break.</p> <p>3 Q. Were those two guys, were they</p> <p>4 rolling dice that day, too?</p> <p>5 A. Harold was.</p> <p>6 Q. You also filed in your lawsuit</p> <p>7 regarding an arrest that was made on you on</p> <p>8 August 18th of 2007. Do you remember that arrest?</p> <p>9 A. Yes, sir.</p> <p>10 Q. That was at the 574 building;</p> <p>11 correct?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Now, on August 18th, 2007, where</p> <p>14 were you living at that time?</p> <p>15 A. That's when I was in the -- we was</p> <p>16 in the 5040 West Washington Park Courts address.</p> <p>17 Q. And the address that you were</p> <p>18 arrested back on August 18th, 2007, that's the</p> <p>19 same building you were arrested at back in April</p> <p>20 of 2004; correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Do you remember the time of day that</p> <p>23 it was that you were arrested on August 18th,</p> <p>24 2007?</p>
<p style="text-align: center;">Page 98</p> <p>1 about Crystal Looney while you were at the</p> <p>2 station?</p> <p>3 A. Yes.</p> <p>4 Q. Who did you have that conversation</p> <p>5 with?</p> <p>6 A. Sergeant Watts.</p> <p>7 Q. Was Crystal Looney let go that day?</p> <p>8 A. Excuse me?</p> <p>9 Q. Was Crystal Looney let go that day,</p> <p>10 or was she charged?</p> <p>11 A. No, she was let go.</p> <p>12 Q. Where was Taurus Smith at the time?</p> <p>13 Did you see him?</p> <p>14 A. He was in the lobby, too. He was in</p> <p>15 the lobby -- are you talking, are we at the</p> <p>16 building or at the police station?</p> <p>17 Q. At the police station.</p> <p>18 A. He was right here with us, too.</p> <p>19 Q. Did Tywon Birmingham get taken back</p> <p>20 to the station?</p> <p>21 A. No, sir.</p> <p>22 Q. How about Harold Owens?</p> <p>23 A. Harold went to the station.</p> <p>24 Q. How about Little Charles?</p>	<p style="text-align: center;">Page 100</p> <p>1 A. I can't remember the time of day it</p> <p>2 was. It was maybe the afternoon or evening. It</p> <p>3 was a rainy day that day. I can't remember the</p> <p>4 time of day it was. It wasn't night, though.</p> <p>5 Q. Okay. You know, I want to go back</p> <p>6 real quick. One other question about your April</p> <p>7 2004 arrest. Did you have any -- prior to seeing</p> <p>8 Crystal Looney at the police station after you</p> <p>9 were already taken in, did you see her at all that</p> <p>10 whole day before that time?</p> <p>11 A. Yes.</p> <p>12 Q. When did you see her last before</p> <p>13 that?</p> <p>14 A. She was staying at her cousin's</p> <p>15 house.</p> <p>16 Q. Which cousin was she staying at?</p> <p>17 A. Victoria Simms.</p> <p>18 Q. Was she living at Ida B. Wells?</p> <p>19 A. Yes. Victoria Simms stayed in</p> <p>20 574 East Browning, Apartment 705.</p> <p>21 Q. So from the time you got up that</p> <p>22 morning, you said 8:00 or 9:00, and went over to</p> <p>23 play dice, did you see Crystal Looney at any point</p> <p>24 after you left the building, but up until you were</p>

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<p>1 taken to the station?</p> <p>2 A. No, sir.</p> <p>3 Q. So now I'm going back to your 2007</p> <p>4 arrest. Did you have a job at that time?</p> <p>5 A. No, sir.</p> <p>6 Q. So how were you supporting yourself?</p> <p>7 A. I wasn't. I was broke.</p> <p>8 Q. You said you were broke?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Sometimes the audio cuts out. So if</p> <p>11 I ask you to repeat it, or if I didn't hear it,</p> <p>12 I'll ask you to repeat it. Okay?</p> <p>13 A. No problem.</p> <p>14 Q. So at that time on August 18th,</p> <p>15 2007, what were you doing that day? What were</p> <p>16 your plans?</p> <p>17 A. I had just left the house, checking</p> <p>18 on Crystal Looney, because she just had got out of</p> <p>19 the hospital. The doctor had just put on her</p> <p>20 bedrest. I had just left the house. Tywon</p> <p>21 Birmingham and Patrick Noonier wanted to meet with</p> <p>22 me. I had went down there. We had met at the</p> <p>23 park, and I was over there at the park, talking to</p> <p>24 Tywon Birmingham and Patrick Noonier.</p>	<p>1 Q. Okay. So she was put on bedrest,</p> <p>2 but she was over at her cousin's place in the</p> <p>3 574 building, is that correct?</p> <p>4 A. I don't believe she was at the</p> <p>5 building at the time of my arrest.</p> <p>6 Q. So, I guess, maybe I misheard you</p> <p>7 then. You said you are were checking on Crystal</p> <p>8 Looney. Where were you checking on her at?</p> <p>9 A. I had just left the house where she</p> <p>10 was at, 5040 West Washington Park Courts.</p> <p>11 Q. So you left 5040 South Washington</p> <p>12 Park Courts, and you drive over to the</p> <p>13 574 building?</p> <p>14 A. Yes. I caught the bus down there.</p> <p>15 Q. So you take public transportation,</p> <p>16 and you would go there, and that was to meet with</p> <p>17 Tywon Birmingham and Patrick Noonier?</p> <p>18 A. Yes. Patrick Noonier, yes.</p> <p>19 Q. Why were you meeting with those two</p> <p>20 people?</p> <p>21 A. Because we used to talk about</p> <p>22 hustling.</p> <p>23 Q. When you say "hustling," do you mean</p> <p>24 selling drugs?</p>
<p style="text-align: center;">Page 102</p> <p>1 Q. Let me go back. So you were</p> <p>2 checking in on Crystal Looney at the time because</p> <p>3 she had been put on bedrest, you said?</p> <p>4 A. Yes. She had just got out of the</p> <p>5 hospital and put on bedrest.</p> <p>6 Q. Were you and Crystal living together</p> <p>7 at the time?</p> <p>8 A. We wasn't living together at the</p> <p>9 time. I told her -- well, she was at the address,</p> <p>10 and I would go there periodically.</p> <p>11 Q. Were you living with Myeisha Smith</p> <p>12 at the time?</p> <p>13 A. No. I was living with my aunty on</p> <p>14 78th and Champlain at the time.</p> <p>15 Q. So you went to check on Crystal</p> <p>16 Looney. What building was she living in at the</p> <p>17 time?</p> <p>18 A. She stayed at 5040 West Washington.</p> <p>19 Q. So why was she at the 574 building</p> <p>20 that day then?</p> <p>21 A. In August of 2007?</p> <p>22 Q. Yes.</p> <p>23 A. Because I believe her cousin and all</p> <p>24 them still stayed in the building.</p>	<p style="text-align: center;">Page 104</p> <p>1 A. Yes.</p> <p>2 Q. Is there anything else you do that</p> <p>3 is considered hustling?</p> <p>4 A. Gamble, get a job, do side jobs.</p> <p>5 Q. So what was going to be the role</p> <p>6 that you played in this hustling with Tywon</p> <p>7 Birmingham and Patrick Noonier?</p> <p>8 A. They needed somebody they can trust.</p> <p>9 We weren't doing nothing, and they just wanted me</p> <p>10 to run things for them, get a team together.</p> <p>11 Q. A team to sell drugs?</p> <p>12 A. Yes.</p> <p>13 Q. So who was going to be the boss of</p> <p>14 this group?</p> <p>15 A. I guess Tywon Birmingham and Patrick</p> <p>16 Noonier.</p> <p>17 Q. Was Patrick Noonier a pretty big-time</p> <p>18 drug dealer or whatever he was?</p> <p>19 A. Yes. He run the Ida B. Wells</p> <p>20 project.</p> <p>21 Q. The whole project? All the</p> <p>22 buildings?</p> <p>23 A. Yes.</p> <p>24 Q. How about Tywon, was he a big-time</p>

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<p style="text-align: center;">Page 105</p> <p>1 dealer? Was he below Patrick Noonan, or what was 2 his rank?</p> <p>3 A. He was right below Patrick Noonan.</p> <p>4 Q. And you would be kind of the guy 5 running the crew, would be selling?</p> <p>6 A. Yes.</p> <p>7 Q. Which building were you going to be 8 selling out of? You personally.</p> <p>9 A. We didn't know yet.</p> <p>10 Q. So this was like a preliminary 11 meeting just to kind of discuss logistics and 12 things like that?</p> <p>13 A. Yes, the time frame when everything 14 was coming in, and how we was going to go about 15 doing it.</p> <p>16 Q. Where did this meeting take place?</p> <p>17 A. Across the street from the 18 574 building, at the park. The older kids, they 19 always like sitting at the park.</p> <p>20 Q. So this conversation was just 21 between you, Patrick Noonan, and Tywon; correct?</p> <p>22 A. Yes.</p> <p>23 Q. So how long did this conversation 24 take place?</p>	<p style="text-align: center;">Page 107</p> <p>1 depending on what we shooting. It all depends on 2 the group, what we shooting that day, or, like -- 3 it just really depends on the group.</p> <p>4 Q. How many days a week were you 5 playing dice between 2004 and 2007?</p> <p>6 A. I was incarcerated. Not for a long 7 time; maybe before my case in 2004, but after I 8 had got incarcerated, I didn't come home until 9 2007.</p> <p>10 Q. So prior to that, though, could you 11 make more than a \$1,000 a day rolling dice?</p> <p>12 A. Yes.</p> <p>13 Q. Really? Could you make more than --</p> <p>14 A. Ask the whole projects about me. I 15 got a reputation for that. I could start with \$2 16 and win \$20,000.</p> <p>17 Q. So you won \$20,000 in one day 18 playing dice?</p> <p>19 A. It took me the whole day.</p> <p>20 Q. Is that highest amount -- go ahead.</p> <p>21 Sorry.</p> <p>22 A. Ask everybody on this case with us. 23 I got a reputation. You don't want to shoot dice 24 with me. I'm going to get every point.</p>
<p style="text-align: center;">Page 106</p> <p>1 A. Maybe 30, 40 minutes.</p> <p>2 Q. I mean, I want to go back, you know, 3 between 2004 and 2007, did you sell drugs at that 4 time?</p> <p>5 A. Not between 2004 and 2007.</p> <p>6 Q. So what were you doing to make money 7 during that time?</p> <p>8 A. I was gambling at that time.</p> <p>9 Q. Now, at that time, in 2004 and 2007, 10 you had children by that time; correct?</p> <p>11 A. Yes.</p> <p>12 Q. So earlier, you testified that you 13 provided them financial support; correct?</p> <p>14 A. Yes.</p> <p>15 Q. So was your gambling winnings 16 sufficient to provide support for your children?</p> <p>17 A. Yes. You can come to the building; 18 you can leave out with the money for a house.</p> <p>19 Q. So how much money would you say you 20 were making on average when you were, you know, 21 playing dice?</p> <p>22 A. It depends on the group. 23 Different -- I'm one of the best shooters. 24 Depending on the group, different groups,</p>	<p style="text-align: center;">Page 108</p> <p>1 Q. So is that the highest amount you 2 ever made in one day, \$20,000?</p> <p>3 A. Yes, off of gambling, yes.</p> <p>4 Q. Well, obviously, your reputation is 5 well-earned, Mr. James.</p> <p>6 A. Thank you.</p> <p>7 Q. So going back now to that day then, 8 after 30 to 40 minutes, what happens next?</p> <p>9 A. I told Tywon Birmingham, -- I asked 10 him for \$20. I had explained to him what 11 Ms. Looney had going on, and they had put her on 12 bedrest. I told him I had to make it back to the 13 crib. He went in his car, and he said he only had 14 two \$50, and he said give him a minute. And I 15 said, "all right, I am fixing to run upstairs to 16 the candy lady."</p> <p>17 Q. Do you know the candy lady's name?</p> <p>18 A. No, I never knew her name. I never 19 knew her name.</p> <p>20 Q. Was the candy lady married to 21 anybody? Did she have a husband or partner?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know her husband or partner's 24 name?</p>

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<p style="text-align: center;">Page 109</p> <p>1 A. No, sir.</p> <p>2 Q. Did you ever meet her husband or</p> <p>3 partner?</p> <p>4 A. Yes, I had met her before.</p> <p>5 Q. No, him, the husband.</p> <p>6 A. No, she had a wife.</p> <p>7 Q. A wife? Okay. So did you ever meet</p> <p>8 the wife before?</p> <p>9 A. Yes, I had met them before.</p> <p>10 Q. So do you know the wife's name?</p> <p>11 A. No, sir. They were just tenants of</p> <p>12 the building.</p> <p>13 Q. Why was she called the candy lady?</p> <p>14 A. Because she sold food. She sold</p> <p>15 candy, chips. She sold cigarettes, pops, juices,</p> <p>16 stuff like that.</p> <p>17 Q. What building was she living out of?</p> <p>18 A. 574 East Browning on the fifth</p> <p>19 floor.</p> <p>20 Q. The fifth floor?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Do you remember the apartment</p> <p>23 number, or just the fifth floor?</p> <p>24 A. I can't recall the apartment number.</p>	<p style="text-align: center;">Page 111</p> <p>1 Q. You heard from somebody on the fifth</p> <p>2 floor?</p> <p>3 A. When they holler "clean up," the</p> <p>4 whole building hear.</p> <p>5 Q. Can you tell where that -- where was</p> <p>6 it starting from? Could you tell?</p> <p>7 A. It just echos. You hear it real</p> <p>8 loud in the building. It's just a real loud echo.</p> <p>9 All you hear is to "clean up."</p> <p>10 Q. So after you hear "clean up," what</p> <p>11 did you do?</p> <p>12 A. I know that is a call for the</p> <p>13 police. In my head, I was thinking, like, man,</p> <p>14 and then I say, no, I ain't fixing to catch the</p> <p>15 elevator. I know they are holding the elevator</p> <p>16 anyway. I'm fixing to walk down the stairs.</p> <p>17 Q. At that time, did you believe that</p> <p>18 Watts and those officers were still patrolling the</p> <p>19 Ida B. Wells projects?</p> <p>20 A. Sergeant Watts, Nichols, and Jones</p> <p>21 had just drove past us while I was crossing the</p> <p>22 street to go inside the building.</p> <p>23 Q. Those three, were they in the same</p> <p>24 car?</p>
<p style="text-align: center;">Page 110</p> <p>1 Q. Did you buy stuff from the candy</p> <p>2 lady frequently?</p> <p>3 A. Yes.</p> <p>4 Q. So that day -- go ahead.</p> <p>5 A. 1:00, 2:00 in the morning, they just</p> <p>6 stop selling food at 10:00, but after that, you</p> <p>7 still can purchase chips, juices, cigarettes,</p> <p>8 blunts.</p> <p>9 Q. So she is always open?</p> <p>10 A. Yes.</p> <p>11 Q. So you said you took -- you got some</p> <p>12 money from Tywon, and you ran up the stairs?</p> <p>13 A. I went in 574 building.</p> <p>14 Q. Yes, you went up the stairs. Did</p> <p>15 you take the elevator or take the stairs?</p> <p>16 A. I took the elevator.</p> <p>17 Q. So you got up there; what did you</p> <p>18 buy from the candy lady that day?</p> <p>19 A. I bought a pop, a bag of Doritos,</p> <p>20 and two little cigarettes.</p> <p>21 Q. Then after you bought that, what did</p> <p>22 you do then?</p> <p>23 A. I was walking back towards the</p> <p>24 elevator, and I heard the "clean up."</p>	<p style="text-align: center;">Page 112</p> <p>1 A. Yes.</p> <p>2 Q. Who was driving?</p> <p>3 A. Jones was driving. Watts was in the</p> <p>4 passenger side, and Nichols was in the backseat.</p> <p>5 Q. Did they stop you at that time?</p> <p>6 A. No. They just rolled past us and</p> <p>7 said, "Hey, how ya'll fellows doing?"</p> <p>8 Q. Did they stop you? Did they get out</p> <p>9 of the car?</p> <p>10 A. No. Their brake light came on, but</p> <p>11 they didn't get out of the car at that point in</p> <p>12 time.</p> <p>13 Q. So going go back now, you are</p> <p>14 walking down the stairs, and then what happens?</p> <p>15 A. I make it to the first floor, and I</p> <p>16 turn the corner from where the basement door at.</p> <p>17 You got to turn that corner, and you go down the</p> <p>18 three stairs to leave out the back door. When I</p> <p>19 made a turn around the corner where -- coming from</p> <p>20 where the basement door at, I took the three --</p> <p>21 well, when I turned the corner, I saw Nichols</p> <p>22 standing right there. He was picking something up</p> <p>23 off the ground.</p> <p>24 Q. Could you see what he was picking</p>

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<p style="text-align: center;">Page 113</p> <p>1 up?</p> <p>2 A. Not at the time, no.</p> <p>3 Q. Can you describe what he was picking</p> <p>4 up?</p> <p>5 A. Not at the time, no.</p> <p>6 Q. How far away was Nichols from you</p> <p>7 when you say you saw him pick up this thing?</p> <p>8 A. Maybe five to seven feet away from</p> <p>9 me. He had his back turned towards me.</p> <p>10 Q. So you were at the bottom? You were</p> <p>11 five to seven feet away when you see this?</p> <p>12 A. Yes. He is standing at the back</p> <p>13 door, picking something up with his back turned.</p> <p>14 Q. So his back is to you, and he is</p> <p>15 reaching over to you to pick up this thing?</p> <p>16 A. Yes. He is bending down, reaching,</p> <p>17 picking something up.</p> <p>18 Q. You know, from the time you got</p> <p>19 released from custody until when you got arrested</p> <p>20 in August of 2007, how many days a week were you</p> <p>21 going in Ida B. Wells?</p> <p>22 A. I was going down to the Ida B. Wells</p> <p>23 every day. That was our hangout spot.</p> <p>24 Q. And at the time, did you see Watts</p>	<p style="text-align: center;">Page 115</p> <p>1 working for him; correct?</p> <p>2 A. Yes.</p> <p>3 Q. So between the time you were in the</p> <p>4 penitentiary on that 2005 case until you were</p> <p>5 arrested in August of 2007, you were never</p> <p>6 arrested by Watts or his team during that period</p> <p>7 of time, is that correct?</p> <p>8 A. I was in the penitentiary before</p> <p>9 2005.</p> <p>10 Q. Right. And then you were released</p> <p>11 from the penitentiary on the 2005 case when?</p> <p>12 A. I was released from the 2005 case in</p> <p>13 2007.</p> <p>14 Q. How long were you out of the</p> <p>15 penitentiary before you were arrested in August of</p> <p>16 2007?</p> <p>17 A. Seven and a half months.</p> <p>18 Q. So in that seven and a half months,</p> <p>19 you were never arrested by Watts or any officers</p> <p>20 working for him; correct?</p> <p>21 A. I can't recall.</p> <p>22 Q. So after you see Nichols pick up</p> <p>23 this thing, what happened next?</p> <p>24 A. He turned around, and he said, "Come</p>
<p style="text-align: center;">Page 114</p> <p>1 and those other officers still patrolling that Ida</p> <p>2 B. Wells while you were doing this?</p> <p>3 A. Yes. They -- you saw them a lot</p> <p>4 down there. That's they -- I guess that was their</p> <p>5 district.</p> <p>6 Q. So from the time that you were</p> <p>7 arrested back in 2004 until this August 18th</p> <p>8 arrest, you weren't arrested by Watts or any of</p> <p>9 the people working for him, is that correct?</p> <p>10 A. From 2004 to 2007?</p> <p>11 Q. Yes.</p> <p>12 A. That's how I went back to the</p> <p>13 penitentiary from 2004 to 2007 --</p> <p>14 Q. Were you -- go ahead.</p> <p>15 A. -- from Sergeant Watts and his</p> <p>16 team.</p> <p>17 Q. No. But after you were released in</p> <p>18 2004, you had probation, and you had 61 days you</p> <p>19 served on the violation of probation, and then you</p> <p>20 were released from custody; correct?</p> <p>21 A. Yes.</p> <p>22 Q. And then you got arrested in 2005</p> <p>23 again, and you go back to the penitentiary, but</p> <p>24 that is unrelated to the Watts and any officers</p>	<p style="text-align: center;">Page 116</p> <p>1 here, Smoke."</p> <p>2 Q. Is Smoke your nickname?</p> <p>3 A. Yes.</p> <p>4 Q. Why is that your nickname?</p> <p>5 A. I used to smoke a lot of weed and</p> <p>6 stuff.</p> <p>7 Q. So he says -- Nichols says, "Come</p> <p>8 here, Smoke," and then what else is said during</p> <p>9 that conversation?</p> <p>10 A. When I got close to him, he grabbed</p> <p>11 me like this (indicating) by my collar, and he</p> <p>12 said, "Who just ran up the stairs, Smoke?" I</p> <p>13 said, "Shit, I don't know. Ya'll you just drove</p> <p>14 past us." He said, "Man, you lying." He said,</p> <p>15 "You saw who it was because you came in the back</p> <p>16 of the building," and they was peaking out the</p> <p>17 door. And me and him got to arguing for a minute.</p> <p>18 That was about it.</p> <p>19 Q. Did you see anybody run up those</p> <p>20 stairs past you when you were walking down?</p> <p>21 A. No.</p> <p>22 Q. So after you argue with Watts --</p> <p>23 with Nichols for a minute, what happens next?</p> <p>24 A. Jones come from around the corner</p>

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<p style="text-align: center;">Page 117</p> <p>1 from out the front way. He came through the 2 middle hallway towards the back door where Nichols 3 was holding me at.</p> <p>Q. How long had it been since Jones 5 drove by with Watts and Nichols in the front of 6 the building? How much time passed?</p> <p>7 A. They didn't drive past in the front. 8 They drove past in the back of the building.</p> <p>Q. When they drove past the back of the 10 building, until the time now you were standing 11 with Nichols, how much time had passed?</p> <p>12 A. It wasn't even five minutes. Maybe 13 three to four minutes, five minutes top.</p> <p>Q. Okay. Now, you said Jones comes in 15 the back door, so happens next?</p> <p>16 A. He said, "Where you get Smoke from?" 17 He said, "Man, Smoke just came from the back 18 stairs." And he was like -- and he thinks I'm 19 bullshitting. He was saying who had ran upstairs.</p> <p>Q. Then what happened with you?</p> <p>21 A. Nichols radioed Watts, and Watts 22 said, "Yes, go ahead." He said, "We got Smoke at 23 the back door." Watts told him, "Hold him until I 24 get down there."</p>	<p style="text-align: center;">Page 119</p> <p>Q. What happened next?</p> <p>1 A. Watts came down. He got to telling 2 me -- asking me the same thing Nichols was asking 3 me, "Who ran up the stairs? Who was at the back 4 door?" I told him I didn't know. He told me, 5 "Man, Smoke, quit bullshitting." He got to 6 telling me, Man, you know you can't afford this 7 one. He said, Man, I ain't playing with your ass 8 today. I'm sorry, he said, I ain't playing with 9 you today. He said, Man, you going to tell me 10 what crib they ran in with that money, or you 11 going to tell me whose up in here working. I was 12 like, Man, I wasn't up in here doing nothing; you 13 just drove past us. And he said, Man, see, I just 14 showed your ass last time about your loyalty. If 15 you don't tell me who ran up them stairs and where 16 they went, I'm going to let Nichols, you know, pay 17 some deed to you. And we got to having a 18 conversation. And I'm like, Damn, what you going 19 to pay me for? I just came home. I ain't doing 20 nothing. And --</p> <p>Q. Hold on. Your audio was kind of 23 cutting in and out, so if you want to wait a 24 second. I'm sorry, try again.</p>
<p style="text-align: center;">Page 118</p> <p>Q. Now, you are still in the 574 building?</p> <p>3 A. Yes. We at the back door of the 4 574 building.</p> <p>Q. What's the street that runs on the 6 back side of the 574 building?</p> <p>7 A. I believe it was 574 East Browning.</p> <p>Q. So that's Browning is that back 9 street?</p> <p>10 A. I believe so.</p> <p>Q. But when Watts and Jones and Nichols 12 drove by, they drove by on Browning?</p> <p>13 A. That's been since. When you say 14 "back street", I am thinking about when you make 15 that turn. That's Vincennes Road right there.</p> <p>Q. So the road that you saw Jones, 17 Watts, and Nichols on was Vincennes?</p> <p>18 A. Yes.</p> <p>Q. So did Watts ever come in the back 20 way of the 574 building?</p> <p>21 A. Yes.</p> <p>Q. And were you placed under arrest at 23 that time?</p> <p>24 A. No.</p>	<p style="text-align: center;">Page 120</p> <p>1 A. Me and Watts -- well, he thought I 2 was playing with him, but he said I was going to 3 tell him who was running up the stairs, or tell 4 him who was running up with that money, or he was 5 going to let Nichols -- what I had said in my 6 transcript. He was like, Smoke, I ain't playing 7 with your ass. Then, shit, he was like, Man, 8 that's your final answer? Are you going to stick 9 to that? I said yes.</p> <p>Q. When you said what you said about 11 Nichols, you cut out. I couldn't hear what you 12 said. Could you repeat what he said about 13 Nichols?</p> <p>14 A. He was going to Nichols pay some 15 deed to me.</p> <p>Q. Meaning hit you?</p> <p>16 A. No, put a case on me, because he was 18 tired of playing with me.</p> <p>Q. Did you see anybody selling drugs 20 that day when you were outside with Nooner and 21 Birmingham?</p> <p>22 A. No. The building was pretty much 23 vacant, probably three or four apartments was up 24 in there, but there was people at building.</p>

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<p>1 Q. But you didn't see anybody selling 2 dope that day, did you?</p> <p>3 A. No. I saw who was at the back door 4 when I went inside the building.</p> <p>5 Q. Did you see anybody who was playing 6 dice outside the building, either the front or the 7 back?</p> <p>8 A. No, not that day, not that 9 particular day.</p> <p>10 Q. So after you said Watts said, "I'm 11 not playing with you," were you placed under 12 arrest?</p> <p>13 A. Yes.</p> <p>14 Q. Was any other officers -- you said 15 Jones was there, Nichols was there, and Watts. 16 Was there any other officers present when you were 17 put in handcuffs?</p> <p>18 A. No.</p> <p>19 Q. Were you taken from there to the 20 police station?</p> <p>21 A. Yes.</p> <p>22 Q. Now, at this time, was it the police 23 station on Ida B. Wells, or was it the police 24 station over at 51st and Wentworth?</p>	<p>1 A. No -- yes, the lieutenant, whoever 2 was over Sergeant Watts.</p> <p>3 Q. A lieutenant?</p> <p>4 A. Yes.</p> <p>5 Q. Do you remember that lieutenant's 6 name?</p> <p>7 A. No, not at the time, no.</p> <p>8 Q. What was the nature of your 9 interaction with that lieutenant?</p> <p>10 A. Because they were trying to put a 11 case on me, and I was mad. I had only been home 12 seven and a half months. I had tried getting 13 Mohammed to save me. I told him the most I could 14 come up with was \$3,000, and he wanted to holler 15 at Watts for me. Watts said how he needed the 16 \$6,000, and, man, I was cooked. And I --</p> <p>17 Q. I didn't want to cut you off. My 18 question was, what -- the lieutenant that you said 19 was there, did you have a conversation with the 20 lieutenant?</p> <p>21 A. Yes.</p> <p>22 Q. Did you see the lieutenant's name?</p> <p>23 A. I don't remember his name.</p> <p>24 Q. Why do you think he is a lieutenant?</p>
<p style="text-align: center;">Page 122</p> <p>1 A. It was the police station on 51st 2 and Wentworth.</p> <p>3 Q. How did you get back to the police 4 station on 51st and Wentworth? Who took you?</p> <p>5 A. Watts, Jones, and Nichols.</p> <p>6 Q. So you were in the car with three 7 officers?</p> <p>8 A. Yes.</p> <p>9 Q. So one of them was in the back with 10 you?</p> <p>11 A. Yes.</p> <p>12 Q. Who sat in the back -- Nichols sat 13 in the back with you?</p> <p>14 A. Yes.</p> <p>15 Q. And when you got back to the 16 station, did you have any other contact with 17 anyone other than Jones, Nichols, and Watts?</p> <p>18 A. Yes.</p> <p>19 Q. Who else did you have contact with?</p> <p>20 A. Mohammed and Coco.</p> <p>21 Q. That was back at the station?</p> <p>22 A. Yes.</p> <p>23 Q. Any other officers that you had 24 contact with back at the station?</p>	<p style="text-align: center;">Page 124</p> <p>1 A. Because they took me to talk to him.</p> <p>2 Q. Who brought you to talk to the 3 lieutenant?</p> <p>4 A. Watts, Nichols.</p> <p>5 Q. They brought you to this lieutenant 6 to talk to him? What did you say to this 7 lieutenant?</p> <p>8 A. He told he was pinning the drugs on 9 me. That wasn't my drugs. I wasn't doing 10 nothing.</p> <p>11 Q. And you don't remember the name of 12 this lieutenant?</p> <p>13 A. Not at the time.</p> <p>14 Q. Do you remember it now then?</p> <p>15 A. If I see a photo of him, yes, I can 16 recognize him. He might still be up there.</p> <p>17 Q. Where was his office located at?</p> <p>18 A. Somewhere in the back by the -- in 19 the tac room, because they took me in the tac room 20 in the back in the office.</p> <p>21 Q. Did you believe this person to be 22 African American, Caucasian, Hispanic? What did 23 you believe?</p> <p>24 A. He was African American.</p>

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<p style="text-align: center;">Page 125</p> <p>1 Q. Was he tall, short? 2 A. He was a little tall. 3 Q. Was he big, heavyset? Was he 4 stocky? Was he skinny? 5 A. No. He was about tall, skinny, and 6 he wore glasses. 7 Q. Okay. And other than what you have 8 just described, did you have any other contact 9 with officers while you were back at the station? 10 A. No, just those officers. 11 Q. Now, when you were arrested on both 12 of your cases, the 2004 case and the 2007 case, 13 you went to bond court; correct? 14 A. Yes. 15 Q. Now, starting with your 2004 case, 16 did you have a public defender appointed for you 17 in that proceeding? 18 A. Yes, I believe so. 19 Q. Did you tell that public defender in 20 bond court that you were being framed? 21 A. No. 22 Q. Did you tell the judge at bond court 23 that you were being framed? 24 A. No.</p>	<p style="text-align: center;">Page 127</p> <p>1 Q. Did you tell the public defender you 2 had that day that you were being framed? 3 A. No, not at the time. 4 Q. Did you ever tell that public 5 defender that you were being framed? 6 A. No. 7 Q. Okay. Now, at your bond -- you were 8 arrested on April 3rd, 2004; correct? 9 A. Yes. 10 Q. And you pled out. It was 11 May 14th of 2004; correct? 12 A. Yes. 13 Q. So you were in custody for 14 approximately 40 days at that time? 15 A. Yes. 16 Q. Now, with regard to 2007 case, you 17 went through the same basic process; right? You 18 went to bond court first; correct? 19 A. Yes. 20 Q. Did you have a public defender 21 assigned to you at bond court? 22 A. Yes. I believe so, yes. 23 Q. Did you tell your public defender at 24 bond court that you were being framed?</p>
<p style="text-align: center;">Page 126</p> <p>1 Q. Once you got assigned to a courtroom 2 at 26th Street -- excuse me, were you assigned a 3 public defender, or did you hire a private 4 attorney? 5 A. I believe a public defender. 6 Q. Do you remember if the public 7 defender was a male or female? 8 A. I can't recall. 9 Q. Do you remember in that case your 10 public defender having a conference with the judge 11 called a 402 conference? 12 A. Yes. 13 Q. Were you present during that 402 14 conference? 15 A. We wasn't present at the 402 16 conference, no. 17 Q. Your attorney went in the back with 18 the judge and had a conversation; correct? 19 A. Yes. 20 Q. How long did you talk to your public 21 defender before she went back and talked to the 22 judge? 23 A. Not that long. They don't come back 24 to talk to you, because you're not the only case.</p>	<p style="text-align: center;">Page 128</p> <p>1 A. No, not at the time. 2 Q. Did you ever tell your public 3 defender, the same public defender, that you were 4 being framed? 5 A. At bond court? 6 Q. Yes. 7 A. No, not at the time. No, sir. 8 Q. When you said, "Not at that time," 9 did you ever tell that public defender you were 10 being framed? 11 A. No, sir. 12 Q. Did you tell the judge in bond court 13 that you were being framed? 14 A. No, sir. 15 Q. Now, you were ultimately assigned to 16 another courtroom again; correct? 17 A. Yes, sir. 18 Q. Was the courtroom on the first floor 19 of the 26th Street building? 20 A. I believe it was the second floor, 21 201, Judge Dooley. 22 Q. At that time, did you have a public 23 defender, or did you hire an attorney? 24 A. I had a public defender.</p>

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<p style="text-align: right;">Page 129</p> <p>1 Q. Does the name William Cary sound 2 familiar to you? 3 A. Yes. 4 Q. Was that your attorney? 5 A. Later on down the line, yes. 6 Q. Okay. So you initially had a public 7 defender when you were in Judge Dooley's 8 courtroom? 9 A. Yes. 10 Q. Was it a male or female public 11 defender? 12 A. Female. 13 Q. Do you remember that public 14 defender's name? 15 A. No, sir. 16 Q. Did you tell that public defender 17 you were being framed? 18 A. Yes. 19 Q. When did you tell her that you were 20 being framed? 21 A. I was sick and tired of them. I 22 told the lieutenant. He didn't do nothing about 23 it. And then I was just tired of being locked up. 24 I just had came home. And --</p>	<p style="text-align: right;">Page 131</p> <p>1 Q. Ultimately, you ended up pleading 2 guilty on that case? 3 A. Yes. 4 Q. Did you ever try to vacate your 5 guilty plea in your 2004 or your 2007 arrest? 6 A. Try to vacate it? 7 Q. Yes. 8 A. No, not at the time, no. 9 Q. Did you ever try to -- go ahead. 10 A. No, I'm finished. 11 Q. Did you ever try to appeal your 12 guilty plea in either of those cases? 13 A. No, sir. 14 MR. ZECCHIN: I'm going to start 15 using exhibits, so do you want to take a 16 five-minute break, so we could try to start moving 17 along at a pretty good clip? 18 MR. RAUSCHER: Sure. 19 MR. PALLES: That would be okay, 20 but, you know, I have got to tell the videographer 21 that I am going to need about 30 or 40 minutes, 22 Tony. 23 MR. ZECCHIN: Okay. 24 MR. PALLES: So it is already 1:00.</p>
<p style="text-align: right;">Page 130</p> <p>1 Q. Okay. So -- go ahead. 2 A. I was tired. 3 Q. So how many times did you tell your 4 public defender that you were being framed? 5 A. Every time I went to court. 6 Q. How many times was that, would you 7 say? 8 A. Over two and a half -- before I had 9 my attorney, maybe four times. 10 Q. Okay. And then you ultimately hired 11 a lawyer? 12 A. Yes, later on down the line when the 13 judge denied my motion, yes. 14 Q. You mean your motion to quash your 15 arrest? 16 A. Yes. 17 Q. Who hired William Cary for you? 18 A. Crystal Looney. 19 Q. Did you ever tell William Cary that 20 you were being framed? 21 A. Yes. 22 Q. How many times did you tell William 23 Cary that you were being framed? 24 A. I told William two times.</p>	<p style="text-align: right;">Page 132</p> <p>1 MR. ZECCHIN: Yes. 2 MR. PALLES: You know, that 3:00 3 issue, I think, is potentially a problem. 4 MR. ZECCHIN: I tend to agree with 5 you, Eric, as a matter of fact. Do you want to 6 take -- we'll take the five minutes and maybe go 7 until -- we'll see how far I get by 1:30, and then 8 we can kind of evaluate it at that point, and that 9 gives me another half hour to see how much I get 10 through? 11 MR. PALLES: I'd leave it up to the 12 videographer, if he is there. Can you weigh in on 13 this, or is he gone? 14 THE VIDEOGRAPHER: So what 15 exactly -- do you think we are going to go past 16 3:00? 17 MR. PALLES: Yes. 18 THE VIDEOGRAPHER: Okay. Yes, 19 whatever you need to do -- 20 MR. PALLES: Perhaps not much past 21 3:00, but I think it is realistic to think that it 22 may go as late as 4:00. 23 THE VIDEOGRAPHER: Okay. Not a 24 problem. I just needed to make sure and take care</p>

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<p style="text-align: center;">Page 133</p> <p>1 of something. So feel free, if you need to let me 2 know of anything else, I will handle it.</p> <p>3 MR. PALLES: How long are we going 4 on break now?</p> <p>5 MR. ZECCHIN: Just five minutes. 6 I'm going to start using exhibits, so I want to 7 get that all in order.</p> <p>8 MR. PALLES: Okay.</p> <p>9 THE VIDEOGRAPHER: We are now going 10 off the record at 12:51 p.m.</p> <p>11 (Whereupon, a brief recess is taken 12 at 12:51 p.m.)</p> <p>13 THE VIDEOGRAPHER: The time is 14 1:03 p.m., we are now back on the record.</p> <p>15 BY MR. ZECCHIN:</p> <p>16 Q. Mr. James, did you sell drugs after 17 you were released from the penitentiary in 18 connection with your 2007 arrest? So in the 2010 19 era?</p> <p>20 A. In the 2010 year?</p> <p>21 Q. Yes. Did you sell drugs? I'm 22 sorry, go ahead.</p> <p>23 A. No, sir.</p> <p>24 Q. Did you sell drugs in 2011?</p>	<p style="text-align: center;">Page 135</p> <p>1 have to go back one more page. I'm sorry. 2 BY MR. ZECCHIN:</p> <p>3 Q. Mr. James, do you see this page in 4 front of you? It's labeled "Verification"?</p> <p>5 A. Yes.</p> <p>6 Q. Is that your signature under that 7 verification, which reads, "I, Shaun James, verify 8 under penalty of perjury that I have reviewed the 9 attached responses to Alvin Jones' 10 interrogatories, and I certify that the answers 11 are true and correct, to the best of my knowledge, 12 information, and memory"? Is that your signature 13 underneath it?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And the date on this verification 16 page is September 20th of 2021; correct?</p> <p>17 A. Yes, sir.</p> <p>18 Q. And you reviewed these answers 19 before you signed this, is that correct?</p> <p>20 A. Yes, sir.</p> <p>21 Q. I want to go to your answer to 22 Question Number 3, please. It should be on 23 Page 3, I believe.</p> <p>24 MR. ZECCHIN: If you could just</p>
<p style="text-align: center;">Page 134</p> <p>1 MR. PALLES: I can't really hear him 2 now, and I'm plugged in. I got like a wire in.</p> <p>3 MR. ZECCHIN: Okay.</p> <p>4 BY MR. ZECCHIN:</p> <p>5 Q. Did you sell drugs in 2011?</p> <p>6 A. No, sir.</p> <p>7 Q. Did you sell drugs in 2012?</p> <p>8 A. No, sir.</p> <p>9 Q. Now, I want to show you what is 10 going to be marked as Exhibit Number 1, and the 11 court reporter will be able to put it up on the 12 screen for you.</p> <p>13 ---</p> <p>14 (Whereupon, Exhibit 1 is marked for 15 identification.)</p> <p>16 ---</p> <p>17 (Exhibit 1 is being viewed via 18 screen share.)</p> <p>19 BY MR. ZECCHIN:</p> <p>20 Q. Do you recognize this document, 21 Mr. James?</p> <p>22 A. Yes.</p> <p>23 MR. ZECCHIN: Could you please go to 24 the very last page for a moment? I'm sorry, I</p>	<p style="text-align: center;">Page 136</p> <p>1 scroll down just a little bit.</p> <p>2 BY MR. ZECCHIN:</p> <p>3 Q. Mr. James, Question Number 3 asks 4 you to identify by name all persons who, to the 5 best of your understanding, have knowledge of the 6 facts that are related to any of the claims of 7 defenses in the statute, including, but not 8 limited to all persons who are not listed in the 9 Plaintiff's Rule 26(a) disclosure.</p> <p>10 You have here listed, you have here 11 D'Andre James as a witness to your 2007 arrest.</p> <p>12 What would your brother, Mr. James, 13 testify to as to your 2007 arrest?</p> <p>14 A. That he was down there. They told 15 him that Sergeant Watts and them had me in the 16 574 building; and him and his girlfriend, Latanya 17 Smith, came over there to see what was going on.</p> <p>18 Q. When you said "down there," -- you 19 said he was "down there," what are you referring 20 to?</p> <p>21 A. Him and his girlfriend stayed in the 22 540 building at the time.</p> <p>23 Q. So other than what you just 24 testified to, would your brother testify to</p>

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<p>1 anything further than that?</p> <p>2 A. Yes. Sergeant Watts wouldn't let me</p> <p>3 go before he was stripping me. Maybe that's about</p> <p>4 it.</p> <p>5 Q. Well, was your brother there when</p> <p>6 you were arrested?</p> <p>7 A. Yes. Him and his girlfriend came</p> <p>8 over there, but they told him they couldn't come</p> <p>9 in the building, and they would let him know</p> <p>10 what's going on with me after they finished.</p> <p>11 Q. Did you see your brother?</p> <p>12 A. When they finished -- him and his</p> <p>13 girlfriend had finally -- was standing back on the</p> <p>14 side of the building back there when they brought</p> <p>15 me out. One of them got in the police car; I</p> <p>16 forgot which one. But when they brought me out</p> <p>17 the back of the building, they was standing over</p> <p>18 there with Tywon Birmingham and Patrick Noonier.</p> <p>19 Q. So how long were you in the building</p> <p>20 for before you were arrested?</p> <p>21 A. They had me in the building for a</p> <p>22 while.</p> <p>23 Q. How long is "a while"? An hour?</p> <p>24 A. Maybe an hour, close to an hour, or</p>	<p>1 there?</p> <p>2 A. No.</p> <p>3 Q. Now, you list Myeisha Smith as a</p> <p>4 witness for your 2004 arrest. What is</p> <p>5 Ms. Smith -- what could she testify to regarding</p> <p>6 your 2004 arrest?</p> <p>7 A. Her and her mother and them -- her</p> <p>8 mother stayed in 540 East Browning. They know the</p> <p>9 whole projects here, and they know which building</p> <p>10 I'm coming out of, because it echoes. When they</p> <p>11 saw a commotion and stuff out the window, her and</p> <p>12 her mother came over there, and that's Tora's</p> <p>13 grandmother. She was snapping on Sergeant Watts,</p> <p>14 like, man, Taurus had just got down here, and they</p> <p>15 told him, Smoke wasn't even in the building. Him</p> <p>16 and Taboo, they was on the side of the building,</p> <p>17 talking to Tywon. And she was snapping on</p> <p>18 Sergeant Watts.</p> <p>19 My kids' mother Myeisha was right</p> <p>20 there with her when Sergeant Watts got in the</p> <p>21 argument and told my kids' grandmother that "Well,</p> <p>22 you're going to have to come bond his ass out</p> <p>23 then."</p> <p>24 Q. So did this conversation take place</p>
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<p>1 maybe an hour, yes.</p> <p>2 Q. So it's just you, Watts, Jones, and</p> <p>3 Nichols for an hour in the lobby of the</p> <p>4 574 building before you are taken out and put in</p> <p>5 the car?</p> <p>6 MR. RAUSCHER: Object to form.</p> <p>7 BY MR. RAUSCHER:</p> <p>8 Q. Was that a "Yes," Mr. James?</p> <p>9 A. Yes. They was trying to do a mini</p> <p>10 sting, yes.</p> <p>11 Q. So was there other people being</p> <p>12 arrested at that time?</p> <p>13 A. No.</p> <p>14 Q. So at that time, it was just you and</p> <p>15 those three officers; correct?</p> <p>16 A. Yes, sir.</p> <p>17 Q. Now, when you were being taken out</p> <p>18 to the squad car, you said you saw your brother?</p> <p>19 A. Yes.</p> <p>20 Q. Did your brother approach you at all</p> <p>21 or the officers at all?</p> <p>22 A. No.</p> <p>23 Q. And when you were inside the</p> <p>24 building, could you see your brother when you were</p>	<p>1 outside of the 574 building?</p> <p>2 A. Yes, on the stair landing, because</p> <p>3 Sergeant Watts grew up down there, and my kids'</p> <p>4 grandmother and him was pretty close.</p> <p>5 Q. So Myeisha Smith was not present</p> <p>6 when you were actually arrested, but only present</p> <p>7 after you were being arrested and taken out of the</p> <p>8 building?</p> <p>9 A. Yes. She saw them taking everybody</p> <p>10 out of the building and putting them in the wagon,</p> <p>11 and then they saw them put me in the police car.</p> <p>12 Q. You list Crystal Looney as a witness</p> <p>13 for both your 2004 and 2007 arrest. What can</p> <p>14 Crystal Looney testify to as to your 2004 arrest?</p> <p>15 A. In 2004? She know I wasn't even in</p> <p>16 the building no more. Her cousin stayed in the</p> <p>17 building in the part 701. She had just left the</p> <p>18 first floor, and I was on the side of the</p> <p>19 building. I told her I would be up there in a</p> <p>20 minute, and I never made it up there. Then when</p> <p>21 the police hit the building, it was always a habit</p> <p>22 for everybody that stay in the building or in all</p> <p>23 the other buildings to come down and look and see</p> <p>24 what was going on.</p>

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<p style="text-align: right;">Page 141</p> <p>1 Q. So Crystal Looney was not present 2 when you were arrested, but simply, you were 3 supposed to come back upstairs, and you never did, 4 and she saw you when you were being taken out of 5 the building?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. How about for your 2007 8 arrest, what would she testify to as to that?</p> <p>9 A. I had just left the house. I wasn't 10 even gone 20 minutes before she got a phone call. 11 I --</p> <p>12 Q. And -- go ahead. She had gotten a 13 phone call?</p> <p>14 A. Excuse me?</p> <p>15 Q. Sorry, you said she had just gotten 16 a phone call, and I wanted you to be able to 17 finish your answer.</p> <p>18 A. Okay. I had just left the house. I 19 told her I would be back. I was going to get me 20 some weed. I wasn't even down there that long 21 right before she was like, "You lying, he just 22 left."</p> <p>23 Q. She is over at 5040 South Washington 24 Park; right?</p>	<p style="text-align: right;">Page 143</p> <p>1 second sentence in the second paragraph. It says, 2 "Plaintiff states that he has had countless 3 encounters with Defendants. Plaintiff states that 4 Defendants consistently stopped and harassed him 5 even before the first false arrest alleged in this 6 case."</p> <p>7 The first question I have for you 8 is, when you say "countless encounters," I mean, 9 you can count to 10, you can count to 100, you can 10 count to a million. What do you mean by 11 "countless encounters"?</p> <p>12 A. They catch you coming out of the 13 back, because that would be the shortcut, instead 14 of walking up the whole block. You know, it's 15 complexes so people used to cut through the backs 16 and stuff, so you can get where you're going a 17 little quicker. And they might catch you coming 18 out of the back, and they will just hurry up, 19 drive up on you, and be like, "Come here," and 20 throw you on the car and stuff.</p> <p>21 Q. When you say "countless," though, 22 you can't put a number on how many times you have 23 been stopped?</p> <p>24 A. No, not back then. No, I've been</p>
<p style="text-align: right;">Page 142</p> <p>1 A. Yes, sir.</p> <p>2 Q. So she would testify that you were 3 only gone for a short period of time before you 4 got arrested?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Anything else she would be able to 7 testify to?</p> <p>8 A. That he left the house, and he 9 didn't have no drugs; he didn't have nothing on 10 him. He was going to meet up with Tywon.</p> <p>11 Q. Okay.</p> <p>12 MR. ZECCHIN: If we can go to 13 Number 5, please. Question Number 5.</p> <p>14 BY MR. ZECCHIN:</p> <p>15 Q. Mr. James, this asks you about -- 16 with respect to the defendant officers identified 17 in your complaint, please provide with specificity 18 what interactions you had with each of them in the 19 five years preceding the events giving rise to 20 your complaint, and the nature of each such 21 interaction.</p> <p>22 There are objections that were put 23 in there by your counsel. But then, I want to 24 draw your attention to the first sentence -- the</p>	<p style="text-align: right;">Page 144</p> <p>1 stopped by them a lot.</p> <p>2 Q. So over 100? Over 500? Over 1,000? 3 Countless?</p> <p>4 A. I can't put a number on it. I know 5 I've been stopped by them a lot of times.</p> <p>6 Q. So when you say "countless," you 7 mean you are incapable of telling me how many 8 times, approximately, they had stopped you?</p> <p>9 MR. RAUSCHER: Objection to form.</p> <p>10 THE WITNESS: Yes. I know they had 11 stopped me numerous times.</p> <p>12 BY MR. ZECCHIN:</p> <p>13 Q. But my question is, you can't tell 14 me a number at all, because it is too many to 15 remember?</p> <p>16 A. Yes, it was too many to count them. 17 I can't give you an exact number.</p> <p>18 Q. The next sentence then says, 19 "Plaintiff states that Defendants consistently 20 stopped and harassed him even before the first 21 false arrest alleged in this case."</p> <p>22 When you say "consistently," what 23 does that mean?</p> <p>24 A. When they found out who I was, every</p>

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<p style="text-align: center;">Page 145</p> <p>1 time they saw me, they will just grab me, throw me 2 on the car, check me. Every time, like, they see 3 me, it will be, like, 20, 30 minutes later, they 4 will see me coming from somewhere else, and they 5 will grab me and just patting on me again and 6 stuff.</p> <p>7 Q. So when you say "consistently," is 8 this every single day?</p> <p>9 A. Yes. It came to a point in time, I 10 stopped coming outside in the morning, because 11 they was on the morning shift, and I would come 12 out at night.</p> <p>13 Q. So every day you were stopped by 14 Watts or people on his team?</p> <p>15 A. Yes. Once they became familiar with 16 me, they stopped me every chance they got.</p> <p>17 Q. How many days -- I mean, how many 18 years did this daily stop take place?</p> <p>19 A. I have been around a long time from 20 his first team. Jay Bulls, Jones, Calvin, all 21 them. Since 2001, since 2002.</p> <p>22 Q. So for at least three years?</p> <p>23 A. Yes. When I first got to knowing 24 him, when he had his first team down there, yes.</p>	<p style="text-align: center;">Page 147</p> <p>1 Q. And this was over a period of more 2 than three years?</p> <p>3 A. Correct.</p> <p>4 Q. And you said that they harassed you. 5 Other than the two arrests you are suing for, have 6 you ever been arrested by Watts or any person you 7 have named in this lawsuit?</p> <p>8 A. For gambling, yes.</p> <p>9 Q. Who arrested you -- I'm sorry, go 10 ahead.</p> <p>11 A. Yes, for like misdemeanors and 12 stuff.</p> <p>13 Q. Who arrested you for gambling?</p> <p>14 A. I believe Gonzalez arrested me for 15 gambling.</p> <p>16 Q. Gambling is a local ordinance 17 violation; correct?</p> <p>18 A. Yes, sir.</p> <p>19 Q. So you can't go to the penitentiary 20 for that; correct?</p> <p>21 A. No, sir.</p> <p>22 Q. And when Gonzalez arrested you for 23 gambling, he didn't plant drugs on you, did he?</p> <p>24 A. No, sir.</p>
<p style="text-align: center;">Page 146</p> <p>1 Q. And this was on a daily basis that 2 this would take place?</p> <p>3 A. Yes.</p> <p>4 Q. So now, just the quick math. We are 5 talking you have been stopped over a thousand 6 times by these officers; is that your testimony?</p> <p>7 A. I have been stopped numerous times 8 by these officers. I can't put a number on it. I 9 wasn't counting exactly how many times.</p> <p>10 Q. But if it is every day for three 11 years, that is over a thousand times; is that 12 accurate?</p> <p>13 A. I'm not going to say that's 14 accurate, because some days, they might see -- 15 like they even told me, "We got bigger fish to 16 fry." They won't mess with me no more than whole 17 day. They somewhere else, doing something else 18 until they get off.</p> <p>19 Q. So then it is not every day then?</p> <p>20 A. No, it is every day that they work. 21 They going to harass you if they know you.</p> <p>22 Q. So every single day you saw the 23 Watts team, they would stop you and harass you?</p> <p>24 A. Yes.</p>	<p style="text-align: center;">Page 148</p> <p>1 Q. So besides the arrest by Gonzalez 2 for gambling, what other times besides the two 3 arrests you are filing this lawsuit about, what 4 other times were you arrested by Watts or anybody 5 on his team?</p> <p>6 A. Jones arrested me for trespassing.</p> <p>7 Q. When was that?</p> <p>8 A. I can't recall what year that was.</p> <p>9 Q. Were you living on Ida B. Wells 10 property at the time?</p> <p>11 A. No. I was in the park.</p> <p>12 Q. And that criminal trespass -- or 13 trespass to land is a misdemeanor; correct?</p> <p>14 A. Correct.</p> <p>15 Q. And when you were arrested for 16 criminal trespass, nobody planted drugs on you 17 that time, did they?</p> <p>18 A. No, sir.</p> <p>19 Q. Besides those two instances, what 20 other times have you been arrested by Watts or 21 members of his team?</p> <p>22 A. I believe those are the only two 23 times. I'm not sure, though, but I believe those 24 are the only two times.</p>

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<p>1 MR. ZECCHIN: Can we go to Number 6, 2 please? 3 BY MR. ZECCHIN: 4 Q. And this says -- Mr. James, this 5 says, "Please list each and every instance in 6 which you claim to have been stopped by any member 7 of the Chicago Police Department and had money 8 taken from you. Please provide the location, 9 date, and who was present for each such alleged 10 occurrence." 11 Your answer now to this one says 12 that you have been stopped and had money taken 13 from you by Chicago Police officers many times in 14 his life, both by Defendants and other police 15 officers. 16 So I would like you to tell me, when 17 did anybody on Watts's team stop you and take 18 money from you the first time? 19 A. Man, they done took so much money 20 from me. At the time I remember, when Mohammed 21 took money from me, I was instructed to put the 22 money in my back pocket, and they was going to 23 come around the block and get the money. They was 24 going to pin us all on the car, and they was going</p>	<p>1 they didn't take money from you; is that your 2 testimony? 3 A. Yes. 4 Q. Now, you talk about Xbox games; that 5 wasn't bought for the officers; correct? 6 A. It was Playstation something at the 7 time. 8 Q. But that wasn't at the direction of 9 any of the other officers, not Watts or Mohammed, 10 but any of the other officers; correct? 11 A. Correct. 12 Q. Do you know a person named Van 13 Jordan? 14 A. Van Jordan? 15 Q. Van, V-A-N. Also, I think he goes 16 by the nickname V-House. 17 A. Yes. 18 Q. Did V-House act as your cleanup man? 19 A. From time to time, yes. 20 Q. What building was Van Jordan, 21 V-House, living out of that he was working as your 22 cleanup man? 23 A. 574 on the 4th Floor. 24 Q. So the cleanup man is the man if the</p>
<p style="text-align: center;">Page 150</p> <p>1 to frisk us, and he was going to get the money out 2 of the back of my pocket. There's -- 3 Q. Other than that -- go ahead. 4 A. There's been times Sergeant Watts 5 done caught me with a pocket full of money on me, 6 and he then made me pay him money, or he was going 7 to pin a case on me. I gave him some money. Then 8 there has been times that, you know, I even 9 brought them lunch. I brought -- they made me buy 10 three Playstation 3s, or he was going to come lock 11 all of us up. 12 Q. I'm going to ask you specifically, 13 not Watts or Mohammed, but any of the other 14 officers, when have any of the other officers 15 taken money from you? 16 A. No, none of all the officers take 17 money from you. They all had a part to play. 18 Q. Well, I'm asking you specifically. 19 You just testified they did not take money from 20 you. Is that your testimony? 21 A. Watts and Mohammed took money from 22 me. 23 Q. My question is not Watts and 24 Mohammed, the other officers. You just testified</p>	<p style="text-align: center;">Page 152</p> <p>1 police come, that he would be the guy to take the 2 dope and hide it until they left; right? 3 A. Yes. 4 Q. What years was Van Jordan, V-House, 5 the cleanup guy for you? 6 A. I can't recall. 7 Q. Do you know a guy Valentine 8 Wilborne? 9 A. Yes. 10 Q. Does he go by "Tedo"? 11 A. Yes. 12 Q. Was he a drug dealer at the 13 Ida B. Wells projects? 14 A. I don't know. Tedo wasn't from 574. 15 Q. Was he -- did he live at 16 Ida B. Wells? 17 A. Yes. 18 Q. Was he a drug dealer at 19 Ida B. Wells? 20 A. I don't know. I never hung with 21 Wilborne like that. 22 Q. Do you know him, though, as a 23 person? Do you have an opinion about him? 24 MR. RAUSCHER: Object to form.</p>

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<p style="text-align: center;">Page 153</p> <p>1 THE WITNESS: I mean, me and him 2 never had a problem. He cool with me. 3 BY MR. ZECCHIN: 4 Q. Is he an honest person, in your 5 opinion? 6 MR. RAUSCHER: Objection. 7 Foundation: 8 THE WITNESS: Like I say, I don't 9 know. We never really hung together like that. I 10 grew up fighting him and his brother and them. 11 BY MR. ZECCHIN: 12 Q. If he said you were an informant for 13 Sergeant Watts, would that be a lie or true? 14 A. I mean, a lot of people said I was 15 an informant for Sergeant Watts and them because 16 of the things they was doing -- make me do. 17 Q. So were you an informant? 18 A. No, sir. 19 Q. I want to go to Question Number 9 20 now. Question Number 9 asks about all injuries, 21 physical, emotional, and mental, you claim to have 22 sustained as a result of the events giving rise to 23 your complaints with alleged counts of the 24 defendant officers.</p>	<p style="text-align: center;">Page 155</p> <p>1 you? 2 A. I didn't walk out of the building. 3 They let me get dressed, and then they took me 4 back to the first floor. 5 Q. When you exited the building, the 6 574 building, you had clothes on; correct? 7 A. Yes. 8 Q. Is there any other physical 9 mistreatment, other than what you have just 10 testified to? 11 A. Just the way they was grabbing on me 12 and stuff like that. 13 Q. Then if you look at the next 14 paragraph that says, "Plaintiff endured 15 imprisonment in harsh, dangerous, and isolating 16 conditions." 17 Regarding your 2004 arrest, you were 18 in Cook County Jail for about 40 days before you 19 pled out; correct? 20 A. Yes. 21 Q. Were you ever housed in segregation 22 while you were in Cook County Jail? 23 A. We was placed on lockdown numerous 24 times.</p>
<p style="text-align: center;">Page 154</p> <p>1 MR. ZECCHIN: If you can go to the 2 next page, please. 3 BY MR. ZECCHIN: 4 Q. Here it's -- the first line at the 5 top of the screen, it says, "Plaintiff states he 6 was physically mistreated during his 2007 arrest." 7 What physical mistreatment did you 8 receive during your 2007 arrest? 9 A. They strip me butthole naked in that 10 hallway. I'm cold. Them floors was cold. I was 11 shaking. I didn't have nothing on. 12 Q. This was when you were arrested in 13 the 574 building? 14 A. Yes. 15 Q. You said you were stripped down 16 naked? 17 A. Yes. 18 Q. How long were you naked for before 19 you put your clothes back on? 20 A. Maybe two or three minutes, because 21 they had to pick each piece of clothing up one by 22 one and go through it thoroughly. 23 Q. And then you put your clothes back 24 on before you walked out of the building, didn't</p>	<p style="text-align: center;">Page 156</p> <p>1 Q. That's a jail-wide thing or a 2 division-wide thing; that wasn't specific to 3 something you did, through; correct? 4 A. Yes. Not all the time. 5 Q. What -- okay. 6 A. Sometimes it be because of fights or 7 short staff, all different types of reasons. 8 Q. What division were you housed in 9 when you were there? 10 A. I can't recall at the time. 11 Q. Do you remember what your security 12 classification was? 13 A. No, not at the time. I don't know 14 if Cook County classifies your security. 15 Q. Did you ever have any privileges 16 taken away, like using the phone, or having 17 visitors? 18 A. Yes. 19 Q. You did? When did you have that 20 done? 21 A. When the jail on lockdown, you can't 22 get no visitors. You can't use the phone. 23 Q. Well, with regard to your specific 24 conduct, though, that was not the reason why you</p>

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<p>1 were locked down; it was something happening at 2 the jail, not with you specifically; correct?</p> <p>3 A. Correct.</p> <p>4 Q. When you were arrested, your 2004 5 arrest, that is, you had visitors, in fact, during 6 that 40 days you were locked up, didn't you?</p> <p>7 A. Yes.</p> <p>8 Q. You had Linda James came to visit 9 you on the 12th of April; right?</p> <p>10 A. Yes.</p> <p>11 Q. And who was Linda to you? Your 12 mother?</p> <p>13 A. No.</p> <p>14 Q. Who is she?</p> <p>15 A. That is Myeisha Smith's friend. She 16 brought Myeisha to see me.</p> <p>17 Q. And on the 27th, you had Raven 18 Jenkins come to visit you; correct?</p> <p>19 A. Yes.</p> <p>20 Q. Who is Raven Jenkins?</p> <p>21 A. A friend I had met, a female 22 associate.</p> <p>23 Q. What about Tijuana Wilcher? She 24 visited you on May 3rd; correct?</p>	<p>1 A. Yes.</p> <p>2 Q. When was that diagnosis made?</p> <p>3 A. When I was in IDOC, I believe. I 4 don't know exactly what year it was. That was in 5 my 2007 arrest.</p> <p>6 Q. What was the name of the doctor or 7 mental health professional that diagnosed you with 8 anxiety?</p> <p>9 A. I don't know. I was at IDOC. It 10 should be on my medical records.</p> <p>11 Q. Well, I got your medical records 12 yesterday at 6:33 in the evening, so that was the 13 day before your deposition, so I didn't see any 14 IDOC medical records in there.</p> <p>15 MR. RAUSCHER: Anthony, I think you 16 produced those DOC records.</p> <p>17 MR. ZECCHIN: Okay.</p> <p>18 BY MR. ZECCHIN:</p> <p>19 Q. Okay. In there, do you remember, 20 Mr. James, who diagnosed you with that at the 21 Department of Corrections?</p> <p>22 A. One of their doctors did. I'm not 23 quite sure which one.</p> <p>24 Q. Which Department of Corrections</p>
<p style="text-align: center;">Page 158</p> <p>1 A. I believe so.</p> <p>2 Q. And the same exact day, you had 3 Kenneth Willis came to visit you at the jail; 4 correct?</p> <p>5 A. Yes. That's a friend to one of his 6 girlfriends, yes.</p> <p>7 Q. And Crystal Looney came to visit you 8 on the 10th of May; right?</p> <p>9 A. I believe so. I'm not quite sure, 10 but, yes, I believe so.</p> <p>11 Q. And the same day, didn't Myeisha 12 Smith come to visit you?</p> <p>13 A. I believe so, yes.</p> <p>14 Q. That six visits in that 40-day 15 period, is there anybody else who came to visit 16 you during that period of time?</p> <p>17 A. I can't recall.</p> <p>18 Q. If you go down a little further, 19 down to the next sentence in that paragraph, it 20 says you suffer from anxiety, sleep deprivation, 21 and depression.</p> <p>22 Have you ever been diagnosed with 23 anxiety by a mental health and medical 24 professional?</p>	<p style="text-align: center;">Page 160</p> <p>1 facility were you in when you were diagnosed?</p> <p>2 A. Pinckneyville Correctional Facility.</p> <p>3 Q. Did you have anxiety before you 4 entered the Department of Corrections?</p> <p>5 A. No.</p> <p>6 Q. And you said that was after your 7 2007 arrest?</p> <p>8 A. Yes, that was the 2007 arrest.</p> <p>9 Q. Now, is that in about -- we'll go 10 over your criminal background in a little bit, but 11 that would have been the fourth time that you 12 received a sentence where you were sent to the 13 Department of Corrections; correct?</p> <p>14 A. I'm not sure. I don't know. Maybe 15 so.</p> <p>16 Q. So after the fourth time, that is 17 when you were diagnosed by the Department of 18 Corrections mental health professional?</p> <p>19 A. That was the first time I ever had 20 to go see a mental health professional.</p> <p>21 Q. Do you see a mental health 22 professional now?</p> <p>23 A. No, sir.</p> <p>24 Q. Do you take any medication for</p>

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<p style="text-align: center;">Page 161</p> <p>1 anxiety now?</p> <p>2 A. No, sir. I never liked the</p> <p>3 medication.</p> <p>4 Q. How about sleep deprivation, have</p> <p>5 you been diagnosed with an actual condition that</p> <p>6 causes sleep deprivation, or are you just saying</p> <p>7 you can't sleep well?</p> <p>8 A. I just can't sleep.</p> <p>9 Q. And depression, have you been</p> <p>10 diagnosed with depression?</p> <p>11 A. Yes. That was the same thing --</p> <p>12 Q. What -- I will let you finish. I'm</p> <p>13 sorry.</p> <p>14 A. That was the same thing,</p> <p>15 Pinckneyville Correctional Center.</p> <p>16 Q. Okay. So you were diagnosed with</p> <p>17 anxiety and depression at the same time?</p> <p>18 A. Yes.</p> <p>19 Q. Were you given any treatment for</p> <p>20 that?</p> <p>21 A. Yes. I was receiving medication.</p> <p>22 Q. Did you have any therapy or anything</p> <p>23 of that sort?</p> <p>24 A. No. IDOC don't give you that.</p>	<p style="text-align: center;">Page 163</p> <p>1 the future.</p> <p>2 What physical manifestations are you</p> <p>3 having?</p> <p>4 A. Problems sleeping, yes. I've got</p> <p>5 nerve damage. Just all type of things wrong with</p> <p>6 me.</p> <p>7 Q. When have you been diagnosed with</p> <p>8 nerve damage?</p> <p>9 A. I was in a real bad accident, and</p> <p>10 the engine stuck on the right side of my body and</p> <p>11 messed me up pretty bad, especially from my waist</p> <p>12 on down on the right side of my body.</p> <p>13 Q. Was that back in 2012, October?</p> <p>14 A. Yes.</p> <p>15 Q. So the nerve damage is from that car</p> <p>16 accident you were in; correct?</p> <p>17 A. Yes.</p> <p>18 Q. Was that a rollover accident?</p> <p>19 A. Yes. The car flipped over a couple</p> <p>20 of times.</p> <p>21 Q. Did it hit a squad car?</p> <p>22 A. No. The squad car hit our car.</p> <p>23 Q. Were you driving the car, or were</p> <p>24 you a passenger?</p>
<p style="text-align: center;">Page 162</p> <p>1 Q. Once you were released from</p> <p>2 Department of Corrections custody, did you get any</p> <p>3 type of mental health or medical attention for</p> <p>4 your depression?</p> <p>5 A. They gave me some medication to come</p> <p>6 home with and a bunch of papers to do some</p> <p>7 follow-up stuff, but I never followed up with it</p> <p>8 or anything.</p> <p>9 Q. Did you ever try to seek any type of</p> <p>10 treatment for anxiety or depression when you were</p> <p>11 released from the Department of Corrections?</p> <p>12 A. No, sir. I didn't like the</p> <p>13 medication.</p> <p>14 Q. Did you ever seek any non-medication-</p> <p>15 based treatment?</p> <p>16 A. No. I never knew you could get</p> <p>17 non-medication or treatment.</p> <p>18 Q. Did you ever ask to go to see a</p> <p>19 doctor and ask about that?</p> <p>20 A. No, sir.</p> <p>21 Q. Now, here -- this is the third line</p> <p>22 from the bottom of Answer Number 9. It says you</p> <p>23 will continue -- has had and will continue to have</p> <p>24 emotional and physical manifestations well into</p>	<p style="text-align: center;">Page 164</p> <p>1 A. I was the driver.</p> <p>2 Q. And you were charged with an offense</p> <p>3 related to that; correct?</p> <p>4 A. They gave me a lot of felonies, yes.</p> <p>5 Q. And you ended up going to the</p> <p>6 Department of Corrections for four years regarding</p> <p>7 that incident; correct?</p> <p>8 A. Yes, sir.</p> <p>9 Q. Now, you have spoken to the FBI;</p> <p>10 correct?</p> <p>11 A. Yes, sir.</p> <p>12 Q. When did you speak to the FBI?</p> <p>13 A. I believe it was in 2018. I'm not</p> <p>14 quite sure of the year or the date.</p> <p>15 Q. Is that the only time that you spoke</p> <p>16 to the FBI, or did you speak to them on multiple</p> <p>17 occasions?</p> <p>18 A. That was the only time.</p> <p>19 Q. Who did you speak with at the FBI?</p> <p>20 Do you remember the name of the person you spoke</p> <p>21 with?</p> <p>22 A. No, sir.</p> <p>23 Q. How many people were there from the</p> <p>24 FBI or anybody -- you were with your lawyers;</p>

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<p style="text-align: center;">Page 165</p> <p>1 correct?</p> <p>2 A. Yes, I know who my lawyers is.</p> <p>3 Q. No, you were with your lawyers when 4 you spoke to the FBI; correct?</p> <p>5 A. Yes.</p> <p>6 Q. Was Mr. Rauscher one of them?</p> <p>7 A. No, sir.</p> <p>8 Q. Was it Mr. Tepfer?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Were there any other lawyers with 11 you representing you when you spoke to the FBI?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Who else was with you, as far as 14 your legal team goes, when you talked to the FBI?</p> <p>15 A. Sean Starr.</p> <p>16 Q. Anybody else?</p> <p>17 A. No, sir.</p> <p>18 Q. How many -- now, so you know who 19 your lawyers are, obviously. How many other 20 people were in the room when you had this 21 conversation with the FBI?</p> <p>22 A. It was the Department of Justice, 23 his assistants, and I believe it was two more 24 people.</p>	<p style="text-align: center;">Page 167</p> <p>1 and all the other teams that he had, how I knew 2 certain things that went on.</p> <p>3 Q. Like what, specifically, you can 4 recall?</p> <p>5 A. They wanted to know, how did I know 6 Sergeant Watts and his team was crooked.</p> <p>7 Q. Did they ask you any -- who did they 8 ask you specifically about, besides Watts and 9 Mohammed?</p> <p>10 A. They was asking about the whole 11 Sergeant Watts team.</p> <p>12 Q. Okay.</p> <p>13 A. From that first team, from that 14 first time period, all the way up until from the 15 end.</p> <p>16 Q. Do you remember any of the specific 17 officers they asked you about?</p> <p>18 A. What role Jones played in it, what 19 role all the officers played in it.</p> <p>20 Q. Which officer do you specifically 21 remember them asking you about, by name?</p> <p>22 A. Sergeant Watts, Mohammed, Jones, 23 Lewis.</p> <p>24 Q. Who is the last person you are</p>
<p style="text-align: center;">Page 166</p> <p>1 Q. Were they male or female?</p> <p>2 A. It was one female, and I believe 3 three males.</p> <p>4 Q. How long did this conversation with 5 the FBI last?</p> <p>6 A. Maybe an hour, hour and a half.</p> <p>7 Q. Were you taking notes while you were 8 talking to them?</p> <p>9 A. No, sir.</p> <p>10 Q. Were they taking -- were the FBI 11 people or the Department of Justice people taking 12 notes while you were talking to them?</p> <p>13 A. I believe so.</p> <p>14 Q. Did they ever give you a copy -- did 15 they ever give you a copy of those notes before 16 you left?</p> <p>17 A. No, sir.</p> <p>18 Q. Did you ever receive a copy of those 19 notes from the FBI or the Department of Justice?</p> <p>20 A. I don't believe I did.</p> <p>21 Q. What did they ask you? What did the 22 FBI people ask you?</p> <p>23 A. They wanted to know how I knew 24 Sergeant Watts and how I knew so much about him</p>	<p style="text-align: center;">Page 168</p> <p>1 naming?</p> <p>2 A. Lewis.</p> <p>3 Q. Lewis, okay.</p> <p>4 A. Smith. Basically, Sergeant Brian, 5 Chinaman, and that's all I can remember about 6 right now.</p> <p>7 Q. What did you tell them about Lewis?</p> <p>8 A. That's the Coco incident.</p> <p>9 Q. Yes. What did you tell them about 10 her?</p> <p>11 A. I heard she got caught up in it.</p> <p>12 Q. Did you have any personal knowledge 13 of that actually happening, or is that what you 14 heard?</p> <p>15 A. I heard -- that is something I 16 heard.</p> <p>17 Q. Then with regard to Smith, did you 18 hear things about him, or did you ever see 19 anything happen with him?</p> <p>20 A. I heard things happening with him.</p> <p>21 Q. And you said Chinaman. Are you 22 referring to Manuel Leano, who is of Asian 23 descent?</p> <p>24 A. Yes.</p>

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<p style="text-align: right;">Page 169</p> <p>1 Q. Did you ever see him do anything 2 improper, or is this what you heard? 3 A. You asked me have I ever seen them 4 do anything improper? 5 Q. Yes. 6 A. All the officers? 7 Q. No. I asked you about Leano. 8 A. Yes. 9 Q. What did you see Leano do? 10 A. My buddy had just came home from 11 doing time for a murder, and he had called him, 12 and wanted him at 575 East Browning, and it was 13 Chinaman, Gonzalez, and Brian. And they rolling 14 through the field, and they had saw me, and my 15 homey is telling them they know me. Then they 16 just told me give them a gun, and he'll let him 17 go. I went right in my back pocket, gave them the 18 gun, and they got out, uncuffed my homey, they let 19 him go, and took the other dude to the station. 20 Q. You had a gun on you? 21 A. Yes. 22 Q. And you gave it over to these 23 officers? 24 A. Yes.</p>	<p style="text-align: right;">Page 171</p> <p>1 A. And Brian. 2 Q. Okay. So three -- go ahead. 3 A. That's all we knew -- 4 Q. You're cutting out. I didn't know 5 if you were still talking. Go ahead. 6 A. I'm sorry. Yes, it was three 7 officers. 8 Q. All three are not African American 9 officers; correct? 10 A. Yes. 11 Q. And there was no African American 12 officer with him at this time; is that what your 13 testimony is? 14 A. Yes. 15 Q. Where did this take place at? 16 A. In the middle of the field, across 17 from 574. I was walking through the field, going 18 towards 540. 19 Q. How about Bolton, Brian Bolton, have 20 you ever seen -- besides what you just testified 21 to, have you ever seen him do anything, or is this 22 what you hear? 23 A. I never seen him do anything. 24 Q. Okay. Have you ever talked to</p>
<p style="text-align: right;">Page 170</p> <p>1 Q. Were you legally allowed to have a 2 gun at that time? 3 A. No, sir. 4 Q. Okay. Why did you have a gun? 5 A. It was a lot going on in 6 Ida B. Wells complex at that time. 7 Q. What year was this that this 8 occurred? 9 A. I can't remember exactly what year 10 it was. I don't remember exactly what year he 11 came home. 12 Q. Who is your friend who got released 13 on a murder that you are talking about? 14 A. Shalawrence Gibbs. 15 Q. How do you spell his first name? 16 A. I'm not sure. I just know how to 17 pronounce it. 18 Q. Say it slower. Maybe that will 19 help. 20 A. Shalawrence Gibbs. 21 Q. "Shawarence"? 22 A. Shalawrence Gibbs. 23 Q. Shalawrence Gibbs? Okay. And you 24 said it was Leano, Gonzalez, and who?</p>	<p style="text-align: right;">Page 172</p> <p>1 anybody from the Cook County State's Attorney's 2 office? 3 A. I don't know -- 4 MR. RAUSCHER: Object to form. 5 BY MR. ZECCHIN: 6 Q. Are you familiar with the Cook 7 County or 26th and Cali? 8 A. 26th and Cali? 9 Q. Yes. 10 A. Yes. 11 Q. You know how there is building south 12 of there, there is a big tall building? 13 A. Yes. 14 Q. Did you ever go in there and talk to 15 anybody? 16 A. Not that I can recall. I don't 17 remember. 18 MR. ZECCHIN: You can put -- that 19 exhibit can come down now. Thank you. Do you 20 want to put up -- hold on a second. 21 BY MR. ZECCHIN: 22 Q. Mr. James, other than what you have 23 just testified to as being diagnosed from the 24 Pinckneyville Correctional Facility, have you ever</p>

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<p style="text-align: right;">Page 173</p> <p>1 seen any medical or mental health professionals 2 before or after that for any type of condition you 3 have?</p> <p>4 A. No, not that I can recall.</p> <p>5 Q. Now, I've got to ask you some 6 questions, but then I might have to show your 7 other interrogatories, but have you been in any 8 substance treatment centers?</p> <p>9 A. Yes.</p> <p>10 Q. What years -- between what years 11 were you being -- were you in a substance 12 treatment center?</p> <p>13 A. I was in Sheridan Correctional 14 Facility.</p> <p>15 Q. And they had a drug treatment 16 program there?</p> <p>17 A. Yes. That's the whole correctional 18 facility is a drug treatment program.</p> <p>19 Q. What substance were you being 20 treated for?</p> <p>21 A. No, I chose to go down there.</p> <p>22 Q. Were you involved in a substance 23 treatment program, though?</p> <p>24 A. Yes. I was involved in their drug</p>	<p style="text-align: right;">Page 175</p> <p>1 custody, or were you in custody?</p> <p>2 A. I was in custody in Cook County Jail 3 when I did Gateway.</p> <p>4 Q. Now, did you need actual substance 5 abuse treatment help, or did you just do it 6 because you had a better housing assignment that 7 way?</p> <p>8 A. I had a better housing assignment 9 and better privileges.</p> <p>10 Q. So it was to make it better for you, 11 not because you really needed the help with the 12 substance treatment?</p> <p>13 A. Correct.</p> <p>14 MR. ZECCHIN: You know, we can skip 15 Exhibit Number 2 and jump right to Exhibit 16 Number 3. We can make that Exhibit Number 2 for 17 purposes of the final transcript.</p> <p>18 - - -</p> <p>19 (Whereupon, Exhibit 2 and Exhibit 3 20 are marked for identification.)</p> <p>21 - - -</p> <p>22 BY MR. ZECCHIN:</p> <p>23 Q. Okay. Mr. James, do you see what's 24 in front of you, Affidavit of Shaun James?</p>
<p style="text-align: right;">Page 174</p> <p>1 treatment program. That is part of the policy of 2 being there.</p> <p>3 Q. So were you actually seeking 4 substance abuse treatment, or were you just going 5 there because you wanted to go to Sheridan?</p> <p>6 A. I was going there because it was 7 closer to the house to get visits. I was already 8 in the prison. I came from -- I was in a rough 9 prison. I believe it was Lawrenceville's 10 Correctional Facility. One of them. I was in a 11 real rough prison at the time. When they sent me 12 back to "Stateway," I heard about this program. I 13 thought you get good time knocked off, and then I 14 just went there because it was closer to the 15 house.</p> <p>16 Q. So it wasn't because you needed help 17 with treatment; it was because you thought it was 18 a better location to be closer to your house?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. It says that you were in 21 several substance treatment centers. Were you in 22 more than just the one at Sheridan?</p> <p>23 A. Yes. I had did Gateway, too.</p> <p>24 Q. Was that when you were out of</p>	<p style="text-align: right;">Page 176</p> <p>1 A. Yes.</p> <p>2 Q. Do you recognize this document?</p> <p>3 A. Yes.</p> <p>4 Q. Is this something that you reviewed 5 the other day when you were preparing for your 6 deposition?</p> <p>7 A. Yes.</p> <p>8 Q. If you go to the second page, is 9 that your signature at the bottom of that second 10 page?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And that is -- your signature is 13 also under the -- labeled "Under penalties as 14 provided by law pursuant to 735 ILCS 5/1-109, the 15 undersigned certifies that the facts set forth in 16 this instrument are true and correct, except as to 17 matters stated to be on information and belief and 18 as to such the undersigned certifies that he 19 believes the same to be true."</p> <p>20 You read that before you signed 21 that; correct?</p> <p>22 A. Yes, sir.</p> <p>23 MR. ZECCHIN: Can we take a 24 one-minute break? I have to text my wife</p>

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<p>1 something really quick, but it's about school. So 2 if I could take a two-minute break, I will be 3 right back.</p> <p>4 THE VIDEOGRAPHER: We are now going 5 off the record at 1:50 p.m.</p> <p>6 (Whereupon, at 1:50 p.m., a brief 7 recess is taken.)</p> <p>8 THE VIDEOGRAPHER: The time is 9 1:55 p.m. We are now back on the record.</p> <p>10 BY MR. ZECCHIN:</p> <p>11 Q. Okay. Mr. James, you were shown, 12 just before we took the break, an Affidavit of 13 Shaun James with your signature at the second 14 page. Do you see that?</p> <p>15 A. Yes, I see it.</p> <p>16 Q. Did you review that affidavit before 17 you signed it?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Now, I'm going to go through, there 20 are some questions I have regarding specific 21 paragraphs. So I want to start -- with Paragraph 22 Number 1, if you could take a look at it.</p> <p>23 And the question I have for you is, 24 other than what you have testified to today, is</p>	<p>1 Watts, Jones, Young, Gonzalez, Mohammed, Coco, and 2 Smitty amongst the officers there. 3 This is referring to your April 3rd, 4 2004 arrest; correct?</p> <p>5 A. Yes.</p> <p>6 Q. Now, you said earlier that you don't 7 think it was Coco who was there that day; correct?</p> <p>8 A. Correct.</p> <p>9 Q. So why did you put her in this 10 affidavit, and you signed under penalty of 11 perjury?</p> <p>12 A. Because I was telling my lawyers 13 about, like, that I had think --</p> <p>14 MR. RAUSCHER: Hold on --</p> <p>15 BY MR. ZECCHIN:</p> <p>16 Q. Don't tell me what you told your 17 lawyers, Mr. James. I'm just asking why you put 18 them in there.</p> <p>19 A. I knew there was a female at the 20 time, but I had to rethink and refresh one of my 21 codefendants, one of my defendant's memory that 22 Coco wasn't there at the time, because I don't 23 remember her being there. He had a female on his 24 team at the time, but that wasn't Coco, because I</p>
<p style="text-align: center;">Page 178</p> <p>1 there any other interactions or instances where 2 you had money stolen, or demands that you pay them 3 that you have not already testified to?</p> <p>4 A. I can't recall all the times.</p> <p>5 Q. Okay. So is there anything other 6 than what you have testified to today, or are you 7 standing on what you have testified to already?</p> <p>8 MR. RAUSCHER: Object to form.</p> <p>9 THE WITNESS: They had a couple of 10 officers that might be misnamed on the 2004 11 arrest.</p> <p>12 BY MR. ZECCHIN:</p> <p>13 Q. We will get to that when we get to 14 Paragraph Number 4, but what I'm asking you, are 15 there any other instances, other than what you 16 have already testified to, where you had money 17 stolen from you by members of Watts's team, or 18 demands that you pay them?</p> <p>19 A. I can't recall all the other 20 instances, but there was quite a few more.</p> <p>21 Q. But you can't tell me any specifics, 22 such as where or when or who was present; correct?</p> <p>23 A. Correct.</p> <p>24 Q. Now, going to Number 4, you have</p>	<p style="text-align: center;">Page 180</p> <p>1 met her in 2007, the first day when I came home. 2 I'll never forget the first day I met her.</p> <p>3 Q. Okay. So what you have in this 4 Number 4, that's a false statement you made in the 5 affidavit you signed; correct?</p> <p>6 MR. RAUSCHER: Object to form.</p> <p>7 BY MR. ZECCHIN:</p> <p>8 Q. Right, Mr. James --</p> <p>9 A. This is -- I'm sorry.</p> <p>10 Q. So that's a false statement that 11 Coco was present when you were arrested in 2004?</p> <p>12 MR. RAUSCHER: Object to form.</p> <p>13 THE WITNESS: Yes, I made a mistake, 14 yes.</p> <p>15 BY MR. ZECCHIN:</p> <p>16 Q. Did you ever do anything to correct 17 that mistake?</p> <p>18 A. Not that I know of.</p> <p>19 Q. And you also say Smitty was amongst 20 the officers there. Isn't it a fact that Officer 21 Smith, Smitty, was not there when you were 22 arrested in 2004?</p> <p>23 A. I believe that was another mistake 24 that I made, too, because there was a bunch of</p>

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<p style="text-align: center;">Page 181</p> <p>1 officers, and we getting the time period messed up 2 about which officers was apart of Watts's team and 3 not.</p> <p>4 Q. So you put the wrong name of the 5 officer in this -- you made a false statement in 6 this affidavit, and then you signed under penalty 7 of perjury; correct?</p> <p>8 A. Yes. I made a mistake, yes.</p> <p>9 Q. And you reviewed this before you 10 signed it, though, didn't you?</p> <p>11 A. Yes.</p> <p>12 Q. Is there any other mistakes in this 13 that you want to correct right now?</p> <p>14 A. Not to my knowledge that I know of, 15 no.</p> <p>16 Q. Did you ever do anything to try to 17 correct the fact that you thought that you named 18 Officer Albert Smith regarding your April 3rd, 19 2004 arrest? Did you ever try to do anything to 20 correct that?</p> <p>21 A. Yes. I had talked to my lawyers 22 about it.</p> <p>23 MR. ZECCHIN: Let's go to Paragraph 24 Number 12, please.</p>	<p style="text-align: center;">Page 183</p> <p>1 was it in 2005, 2006? Can you add more specifics 2 with regard to when?</p> <p>3 A. I'm not quite sure exactly what year 4 that was.</p> <p>5 Q. Do you remember if it was five years 6 later, two years later, 10 years later?</p> <p>7 A. No, sir.</p> <p>8 Q. How many people were out when this 9 happened, when Watts allegedly gave this speech?</p> <p>10 A. Man, it was a lot of people out 11 there, way too many to even count, because people 12 was coming from all over.</p> <p>13 Q. Do you remember anybody that was 14 present when that happened?</p> <p>15 A. Taurus Smith, Christopher Scott. 16 Those are the only two that I remember offhand.</p> <p>17 Q. And then you say, "I learned that he 18 and his team would retaliate against people who 19 filed complaints or wouldn't pay him off", how 20 did you learn that? Who did you learn that from?</p> <p>21 A. I witnessed it.</p> <p>22 Q. Who did you witness it?</p> <p>23 A. It was this guy on State Street. He 24 was in 574. He didn't know who Sergeant Watts and</p>
<p style="text-align: center;">Page 182</p> <p>1 BY MR. ZECCHIN:</p> <p>2 Q. In Number 12, I specifically want to 3 ask you about where you never filed a complaint 4 because you knew Watts found out about them.</p> <p>5 Who else do you know filed a 6 complaint about Watts that he found out about?</p> <p>7 A. I don't know who filed the complaint 8 against him, but he came down there like a raging 9 bull, screaming and pushing, like, everybody from 10 all the buildings over to the park, and he had 11 gave his little speech; somebody had made a 12 complaint about him.</p> <p>13 Q. This is -- are you referencing where 14 you say, "I remember one instance, which was after 15 April 2004"?</p> <p>16 A. Yes. That's the --</p> <p>17 Q. Can you give me -- go ahead.</p> <p>18 A. That is the instance I'm talking 19 about, when he came down there like a raging bull, 20 somebody had called OPS on him, and he was like, 21 Ya'll motherfuckers want to call OPS on me? Ain't 22 nobody getting OPS nothing.</p> <p>23 Q. You said after April of 2004. Could 24 you give me any more details as to when? I mean,</p>	<p style="text-align: center;">Page 184</p> <p>1 them was, and they came in the building. He was 2 up in there doing what he was doing, selling drugs 3 and stuff. And he said something to Sergeant 4 Watts. They just got to beating him.</p> <p>5 Q. Were you present for this?</p> <p>6 A. Yes.</p> <p>7 Q. What's the guy's name?</p> <p>8 A. I don't know him. He went from 9 Ida B. Wells to the housing authority.</p> <p>10 Q. What year did this take place?</p> <p>11 A. I'm not sure exactly what year this 12 was.</p> <p>13 Q. Can you tell me any other 14 information other than they beat some guy up in 15 the 575 building?</p> <p>16 A. It was in the 574 building when he 17 beat the guy, and I saw someone come up in the 18 574 building, a grown man, and I witnessed Jones 19 beating him for no apparent reason.</p> <p>20 Q. Well, let's go back to the first guy 21 you're talking about first. Where were you at 22 when this all took place? Were you literally 23 standing right there?</p> <p>24 A. Yes. We was in the lobby. We was</p>

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<p style="text-align: right;">Page 185</p> <p>1 shooting dice. They had snuck up in the building, 2 and the guy didn't know who they was, and he came 3 on downstairs. He had a bundle in his hand, and 4 they just grabbed him and got to beating him.</p> <p>5 Q. Who was there for that?</p> <p>6 A. I can't recall who all was in the 7 building that day. We was laughing and joking 8 about him.</p> <p>9 Q. Laughing and joking about the guy 10 getting beat up?</p> <p>11 A. No, about how he didn't know who 12 Watts was, not about him getting beat up.</p> <p>13 Q. And then you say they had Jones beat 14 them. Who did you know that was beaten up by 15 Sergeant Jones?</p> <p>16 A. Oh, man. I can't remember that 17 guy's name. They arrested him, too. He was one 18 of the guys on the '04 case. I witnessed Sergeant 19 Jones beat him.</p> <p>20 Q. You witnessed it? So you saw it 21 with your own eyes?</p> <p>22 A. Yes.</p> <p>23 Q. Where did that allegedly take place?</p> <p>24 A. The lobby of 574 building, by the</p>	<p style="text-align: right;">Page 187</p> <p>1 MR. ZECCHIN: You can take the 2 affidavit down. I believe we're done with that.</p> <p>3 BY MR. ZECCHIN:</p> <p>4 Q. Mr. James, did you ever go to OPS to 5 report what had happened to you after your 2004 6 arrest?</p> <p>7 A. No, sir.</p> <p>8 Q. Did you ever look up on the internet 9 after that how to report wrongful police conduct?</p> <p>10 A. I don't believe I did.</p> <p>11 Q. Did you ever ask any of the 12 attorneys, public defender, or Mr. Cary what to do 13 about officers who framed you?</p> <p>14 A. No, sir.</p> <p>15 Q. Did you ever call the FBI or the DEA 16 or any agency to report what happened to you?</p> <p>17 A. No, sir.</p> <p>18 Q. Are you familiar with the Civilian 19 Office of Police Accountability, COPA, on Chicago 20 Avenue?</p> <p>21 A. I just learned about them, yes.</p> <p>22 Q. Did you ever go talk to anybody in 23 that building who is with COPA?</p> <p>24 A. No, sir.</p>
<p style="text-align: right;">Page 186</p> <p>1 front hallway.</p> <p>2 Q. And are there still the 20 or 30 3 people in the lobby when this took place?</p> <p>4 A. Yes. Everybody witnessed that, yes.</p> <p>5 Q. How long did this beating last?</p> <p>6 A. He was smacking the man so hard four 7 or five times.</p> <p>8 Q. Did the man fall to the ground?</p> <p>9 A. Yes. He had tears in his eyes and 10 everything, yes.</p> <p>11 Q. Did you recognize this man or know 12 him by a nickname?</p> <p>13 A. No. I seen him around the 14 Ida B. Wells complex before a couple of times.</p> <p>15 Q. You never learned his name or his 16 nickname?</p> <p>17 A. No. I used to see him a lot. He 18 used to come through there to sell towels, socks, 19 that type of stuff.</p> <p>20 THE VIDEOGRAPHER: Counselor, I 21 don't know if you are aware, but the witness's 22 camera is off.</p> <p>23 THE WITNESS: I'm sorry.</p> <p>24 THE VIDEOGRAPHER: Okay.</p>	<p style="text-align: right;">Page 188</p> <p>1 Q. Did you ever talk to any reporters 2 about your case?</p> <p>3 A. No, sir.</p> <p>4 Q. Were you ever interviewed for a TV 5 show called Whistleblower? It was on Channel 2, 6 CBS?</p> <p>7 A. No, sir.</p> <p>8 Q. Do you know an officer named Shannon 9 Spalding?</p> <p>10 A. Not by that name.</p> <p>11 Q. Do you know an officer named Daniel 12 Traveria (phonetic)?</p> <p>13 A. Daniel Traveria? No, sir.</p> <p>14 Q. Do you know a guy named Danny 15 Hopkins, who might have gone by the name Chewy, 16 who used to hang out at Ida B. Wells?</p> <p>17 A. Chewy? Not right off the top of my 18 head, no, sir.</p> <p>19 Q. Now, I just want to ask you some 20 questions about your criminal background. Okay?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Have you ever given the name Devonne 23 White to Chicago police officers when you were 24 arrested?</p>

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<p>1 A. Yes, sir.</p> <p>2 Q. That's not your name; correct?</p> <p>3 A. No, sir.</p> <p>4 Q. Why did you give the name Devonne</p> <p>5 White?</p> <p>6 A. I was just always a knucklehead and</p> <p>7 always just lying to the police about my name.</p> <p>8 Q. That was from an arrest back in July</p> <p>9 of '99, a drug arrest; right?</p> <p>10 A. Yes.</p> <p>11 Q. On that case, do you remember</p> <p>12 getting -- initially getting offered probation,</p> <p>13 and then you got a violation of probation on that</p> <p>14 case?</p> <p>15 A. Yes.</p> <p>16 Q. Was that the first time you went to</p> <p>17 the Department of Corrections?</p> <p>18 A. I believe so. I believe that's how</p> <p>19 I ended up in boot camp, yes.</p> <p>20 Q. Did you ever give the name Demarco</p> <p>21 Johnson to the police?</p> <p>22 A. Yes.</p> <p>23 Q. And you actually did that on two</p> <p>24 different occasions; isn't that true?</p>	<p>1 meaning yelling something, probably "clean up," or</p> <p>2 something else, probably like for selling drugs or</p> <p>3 something.</p> <p>4 Q. But soliciting unlawful business is</p> <p>5 a city ordinance charge; right?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Now, 10 days later, April 19th of</p> <p>8 2002, back at the 574 building again, you were</p> <p>9 arrested for criminal trespass of state-supported</p> <p>10 land; correct?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And at the time, you were living at</p> <p>13 64th and Laflin; right?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And again, that 574; that is, again,</p> <p>16 Ida B. Wells property; correct?</p> <p>17 A. Yes, sir.</p> <p>18 Q. And the officer that arrested you,</p> <p>19 Deltonte, that is not one of Watts's officers, is</p> <p>20 it?</p> <p>21 A. I don't believe so.</p> <p>22 Q. I think when we talked earlier, you</p> <p>23 were arrested by Officer Jones for criminal</p> <p>24 trespass back in May of 2003. Do you remember</p>
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<p>1 A. Yes.</p> <p>2 Q. And both of those arrests were</p> <p>3 misdemeanors anyway, weren't they?</p> <p>4 A. Yes.</p> <p>5 Q. The same thing, just kind of being a</p> <p>6 knucklehead?</p> <p>7 A. Yes. Even with my kid's mother; I</p> <p>8 gave him the wrong name, one of my kids is named</p> <p>9 after me, and that wasn't my name.</p> <p>10 Q. Okay. You had been arrested at</p> <p>11 Ida B. Wells before April 3rd of 2004; correct?</p> <p>12 A. Yes.</p> <p>13 Q. And, in fact, you were arrested by</p> <p>14 officers not on Watts's team; correct?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. You know, when you were</p> <p>17 arrested on April 9th of 2002 at the 574 building,</p> <p>18 it was for soliciting unlawful business, by an</p> <p>19 Officer Vincent. Do you remember that arrest?</p> <p>20 A. Not off the back of my head.</p> <p>21 Q. Do you remember what you were</p> <p>22 allegedly soliciting, what you were doing that</p> <p>23 they said in that arrest?</p> <p>24 A. They probably said soliciting,</p>	<p>1 that arrest?</p> <p>2 A. Yes.</p> <p>3 Q. That was a valid arrest because you</p> <p>4 weren't living at the Ida B. Wells at the time;</p> <p>5 right?</p> <p>6 A. No, I was in the park across the</p> <p>7 street from the building.</p> <p>8 Q. The park that is part of</p> <p>9 Ida B. Wells?</p> <p>10 A. Yes. It is a public park. Close</p> <p>11 to --</p> <p>12 Q. And again, that was just a</p> <p>13 misdemeanor; right?</p> <p>14 A. Yes. Correct.</p> <p>15 Q. Do you remember being arrested --</p> <p>16 strike that. Is 8217 South Ellis, where is that</p> <p>17 in relation to where Ida B. Wells was?</p> <p>18 A. 8217 South Ellis?</p> <p>19 Q. Yes.</p> <p>20 A. That is nowhere near Ida B. Wells.</p> <p>21 Q. Do you remember being arrested there</p> <p>22 for soliciting unlawful business?</p> <p>23 A. Yes.</p> <p>24 Q. What were you soliciting there?</p>

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<p>1 A. I wasn't doing nothing. I was 2 outside, trying to buy some weed from this guy, 3 police rolled up, and he took off. 4 Q. That was not Ida B. Wells property; 5 correct? 6 A. No, sir. 7 Q. You were arrested on 8 February 13th, 2004, again, at the 574 building 9 for criminal trespass by an Officer Benitez. Do 10 you remember that arrest? 11 A. Not off the top of my head, no. 12 Q. You gave the address of 6211 South 13 Carpenter as your residence, which, you know, you 14 may have just given that, but that was, again, on 15 Ida B. Wells property; right? 16 A. Yes. 17 Q. And Officer Benitez, to the best of 18 your knowledge, he is not one of Watts's officers; 19 correct? 20 A. Not that I know of. 21 Q. You know, you were you arrested on 22 April 1st of 2007, at 540 East 36th Street for 23 criminal trespass by an Officer Watts. Was it Ron 24 Watts or a different Watts?</p>	<p>1 out on bond on that aggravated fleeing and 2 eluding? 3 A. Yes. 4 Q. And you got two years in the 5 Department of Corrections on that; correct? 6 A. Yes. 7 Q. Do you have any other felony 8 convictions that I am missing? 9 A. No, sir. 10 Q. One quick misdemeanor you have from 11 September 10th, 2012. Do you remember getting 10 12 days at Cook County Jail for a false registration 13 and driving on a suspended license? 14 A. Yes. 15 Q. Do you still keep in contact with 16 anyone who lived at Ida B. Wells when you were 17 hanging out there? 18 A. Yes. That's still our hangout spot. 19 We still go down there every day. That's where we 20 go to. 21 Q. Who do you still see from back when 22 you were living there or when you were hanging 23 there? 24 A. Christopher Scott -- I don't know</p>
<p>1 A. I think that's a different Watts. I 2 think that's a Steven Watts. 3 Q. That was just for criminal trespass 4 misdemeanor; right? 5 A. Yes. 6 Q. Now, you talked a little earlier 7 about when you were in that car accident, and you 8 said you had four years in the Department of 9 Correction on that one? 10 A. Yes. 11 Q. And that was -- was that the 12 incident of October 10th of 2012? 13 A. Yes. 14 Q. Do you remember what you ultimately 15 pled or were convicted of for that case? 16 A. Fleeing and eluding, and they 17 dropped off aggravated fleeing and eluding, and 18 all those charges was dropped. 19 Q. Then you have one other felony 20 conviction in your background, and that was from 21 November 7th of 2013, an escape charge. Do you 22 remember that? 23 A. Yes. 24 Q. Was that related to when you were</p>	<p>1 all these guys real names. I know a lot of 2 nicknames. 3 Q. You can give me nicknames. We hear 4 a lot of nicknames. 5 A. Bear, GetBig (phonetic), G Thang -- 6 Q. You dropped out. You are kind of 7 cutting out. Sorry. 8 A. Bear, GetBig, G Thang. Everybody 9 still be down there. Dubler (phonetic), Buller 10 (phonetic), CEO, M-Jim. I mean, everybody still 11 be down there. Deon. 12 Q. Do you know if any of these guys 13 have also filed lawsuits related to Watts or his 14 team? 15 A. Some of them, I believe, have. 16 Q. Well, Christopher Scott, I do know, 17 does. But anybody else you have named? 18 A. Not to my knowledge. I know Bear, 19 he filed a lawsuit -- 20 Q. Are you saying "Bear"? 21 A. Yes. 22 Q. Like the animal? 23 A. Yes. 24 Q. Go ahead. I didn't mean to cut you</p>

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<p style="text-align: center;">Page 197</p> <p>1 off. I just wanted to make sure I heard you 2 right. 3 A. To the best of my knowledge, like, a 4 lot of -- everybody still come down there and hang 5 out, watch the football games on Sundays, and we 6 got people who play basketball, and just sit in 7 the park. 8 MR. ZECCHIN: You know, if you want 9 to take just a minute break, Scott. I think I am 10 done with my questioning. You know what we can 11 do, if you want to keep moving forward, if I have 12 any follow-up, will you let me go back and ask him 13 whenever he's done? 14 MR. RAUSCHER: That's okay. Yes. 15 MR. ZECCHIN: Let's just do that, 16 then we can keep moving. 17 So with that, Mr. James, at this 18 point, I have no other questions. So the other 19 attorneys will likely have some for you, so I'm 20 going to turn the floor over to them. Okay? 21 THE WITNESS: Okay. 22 MR. ZECCHIN: Thank you. 23 THE WITNESS: You're welcome. 24 MR. PALLES: Does anybody else want</p>	<p style="text-align: center;">Page 199</p> <p>1 We ended up leaving the Church's. 2 As we was leaving the Church's, the police saw 3 smoke coming out of the car, because the windows 4 was down, and then they had busted a U-turn. 5 They never got behind us, but they 6 was pursuing us. But we did take off at a high 7 rate of speed. When we was going up Union Street, 8 we made a right up Union Street. I think we got 9 maybe a block lead on them. 10 Anyway, we was flying up Union 11 Street. When we made it to 76th and Union, it was 12 a squad car coming, forensic squad car. And we 13 didn't know if he was -- I didn't know if he was 14 trying to cut us off at the block, at the 15 beginning of the block, so I ran through the stop 16 sign, and he ran the stop sign, too, and he hit 17 the back of the car, and it started flipping over. 18 Q. Who was driving? 19 A. I was driving. 20 Q. Were you hospitalized? 21 A. Yes. 22 Q. For how long? 23 A. It wasn't that long. Maybe a few 24 hours. They wrapped it up, put the cast on it,</p>
<p style="text-align: center;">Page 198</p> <p>1 to go? 2 MR. KOSOKO: I can go if you don't 3 want to go, Eric. 4 MR. PALLES: I'll go. Then I can 5 sleep during yours. 6 --- 7 EXAMINATION 8 BY MR. PALLES: 9 Q. Hi, Mr. James. I appreciate your 10 time today. I'm going to try to just touch on a 11 few things, kind of clean up some of the stuff you 12 have already testified to. 13 Let me ask you, first of all, tell 14 me a little bit about that October 11th, 2012 15 accident. I just saw this material again this 16 morning. Can you tell me what happened there? 17 A. Me and my friend, we was driving. 18 We went to Church's on 79th. We was smoking weed 19 in the car. He was drunk. We got to arguing, and 20 his girlfriend was making him mad. She wouldn't 21 answer the phone, so he cussed the lady out 22 working at Church's. They said I was too 23 disrespectful. I said, "Well, I paid for my food. 24 Can I get my money back, and we'll leave."</p>	<p style="text-align: center;">Page 200</p> <p>1 and then they sent me to jail. 2 Q. What was the injury? Broken bones? 3 A. Yes. I broke my tibia bone and 4 something else they said. 5 Q. Anything else other than scratches 6 and bruises and things like that? 7 A. No, just my forehead was busted 8 open, and nothing really else to the extent. 9 Q. Did you walk on crutches for some 10 period of time? 11 A. Yes. 12 Q. How long? 13 A. I was on crutches for some months. 14 Q. Yes, okay. 15 A. And then after the crutches came 16 off, they had a boot on me. 17 Q. Hey, listen, I want to skip now 18 to -- you were testifying about the first 2004 19 arrest. And particularly, we're talking about 20 when it was that you saw Crystal Looney that day. 21 Now, correct me if I'm wrong, you 22 originally -- she wasn't living at IBW at the 23 time; correct? 24 A. No, sir.</p>

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<p style="text-align: center;">Page 201</p> <p>1 Q. I'm not correct, or she was not 2 living there? That was a bad question. 3 A. She was staying there with her 4 cousin at the time. 5 Q. Okay. Now, you, on the other hand, 6 were playing dice off to the side of the building; 7 correct? 8 A. No. We was shooting dice inside the 9 lobby of the building. 10 Q. Oh, okay. And this is when you saw 11 roughly seven police cars pull up; correct? 12 A. I wasn't shooting dice anymore. I 13 had left out the building, and that's how I ended 14 up on the side of the building. 15 Q. Okay. All right. Fine. Now, after 16 your arrest, when was the next time you saw 17 Crystal? 18 A. When I made it -- 19 MR. RAUSCHER: Object to form. 20 BY MR. PALLE: 21 Q. You can go ahead. 22 A. When I made it to the police 23 station. 24 Q. Okay. Did she arrive at the police</p>	<p style="text-align: center;">Page 203</p> <p>1 building was there at the time. 2 Q. And all within earshot of Watts? 3 A. Yes. It's a big open room. 4 Q. And Watts spoke in a tone of voice 5 that could be heard throughout the room? 6 A. Yes. 7 Q. Now, there was some questions about 8 substance abuse treatment. When you went in for 9 substance abuse treatment, what was the substance 10 that you were dealing with? 11 A. I was just using marijuana at the 12 time. 13 Q. Got you. Have you ever used 14 alcohol? 15 A. Yes. I wasn't even really no big 16 drinker at that time. 17 Q. Did you ultimately become a big 18 drinker? 19 A. Yes. Years, years later on down the 20 line, yes. 21 Q. When would you say you first began 22 struggling with the abuse of the alcohol? 23 MR. RAUSCHER: Object to form. 24 THE WITNESS: I don't struggle with</p>
<p style="text-align: center;">Page 202</p> <p>1 station after you did? 2 A. Yes. 3 Q. Where were you when you first saw 4 her? 5 A. We all was in, I guess you can say, 6 the holding cell, where they do paperwork at, like 7 in the holding room, where they do paperwork at. 8 Q. She was sitting in the holding area 9 with you? 10 A. They had brought her in there, 11 correct. 12 Q. And at the time, Taurus was there, 13 am I correct? 14 A. Yes. 15 Q. And Harold? 16 A. Yes. 17 Q. Now, it was in front of all these 18 people that Sergeant Watts said that he was either 19 going to arrest her if you didn't give him some 20 information or money, is that correct? 21 A. Yes. 22 Q. Now, just so I'm clear, was Officer 23 Mohammed there at the time? 24 A. All the officers that was at the</p>	<p style="text-align: center;">Page 204</p> <p>1 it. I never struggled with it. 2 BY MR. PALLE: 3 Q. Did you receive treatment for 4 alcohol abuse? 5 A. Yes, I have received AA, yes. 6 Q. When? Beginning when? 7 A. When I went to Cook County Jail. I 8 don't know exactly what year that was, and then 9 when I went to Sheridan Correctional Facility. 10 Q. Now, let me ask you about the second 11 arrest, the 2007 arrest. That was principally by 12 Officer Nichols; correct? 13 A. Yes. 14 Q. Was Mohammed present at the time 15 that Nichols arrested you? 16 A. No. 17 Q. Now, did you say you saw him back at 18 the station? 19 A. Yes. 20 Q. How long after the arrest? 21 A. So once they took me and got me back 22 to the station on 51st and Wentworth, they was 23 taking me in, and Mohammed and Coco was doing 24 something. Mohammed said, "What they fuck they</p>

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<p style="text-align: center;">Page 205</p> <p>1 got you for, Smoke?"</p> <p>2 Q. What did you say to him?</p> <p>3 A. I said, "Man, he trying to play me</p> <p>4 again. My old man, let me holler at you."</p> <p>5 Q. What did you mean when you said,</p> <p>6 "Let me holler at you"?</p> <p>7 A. That's what you say to them when you</p> <p>8 fixing to get played, to see if you can work</p> <p>9 something out with them.</p> <p>10 Q. What did he say to you then?</p> <p>11 A. He came in and hollered at me.</p> <p>12 Q. He what?</p> <p>13 A. He came and talked to me.</p> <p>14 Q. What did he say?</p> <p>15 A. He came and said he would talk to</p> <p>16 Watts and see what he can do.</p> <p>17 Q. By the way, where was this? Was</p> <p>18 this in a big room, or was this in an interview</p> <p>19 room or what?</p> <p>20 A. This was in the tactical room on</p> <p>21 51st and Wentworth police station.</p> <p>22 Q. Who else was there at the time, just</p> <p>23 you and Mohammed?</p> <p>24 A. No. There was a lot of officers up</p>	<p style="text-align: center;">Page 207</p> <p>1 deliver words with what we had to do.</p> <p>2 Q. What did he tell you specifically?</p> <p>3 Did he tell you how much money to put in or what?</p> <p>4 A. Yes. I had to have \$1,000 in my</p> <p>5 back pocket. They said they were going to come</p> <p>6 back around, and they were going pin all of us up</p> <p>7 on the car, and they was going to make it like a</p> <p>8 regular frisk, and just make sure I have it in my</p> <p>9 left back pocket.</p> <p>10 Q. How many times total did you pay off</p> <p>11 Mohammed?</p> <p>12 A. Two times, maybe three total, that I</p> <p>13 know of.</p> <p>14 Q. How much money was involved?</p> <p>15 A. One time he met me at my house. I</p> <p>16 gave him what? I forgot how much money I gave</p> <p>17 him. I gave him quite a few hundred the day he</p> <p>18 met me at my house. And the other two times, one</p> <p>19 was outside the building, and the other one was</p> <p>20 inside the building.</p> <p>21 Q. I think I asked you how much total</p> <p>22 money was involved.</p> <p>23 A. I can't recall how much money total.</p> <p>24 Q. What did you understand was going to</p>
<p style="text-align: center;">Page 206</p> <p>1 in there. He came to me. You know, he was</p> <p>2 whispering to me. I was whispering to him. "All</p> <p>3 right, I'm going to go holler at him."</p> <p>4 Q. What did Mohammed do after that?</p> <p>5 A. He went to holler at Watts for me.</p> <p>6 Q. And then what happened?</p> <p>7 A. He came back -- Mohammed came back,</p> <p>8 and he said, "Man, Smoke, he said he already told</p> <p>9 you. He gave you a number." And he threw up six</p> <p>10 fingers. I said, "Man, tell him I ain't got six.</p> <p>11 I only got three."</p> <p>12 Q. Now, the \$3,000 you had, where did</p> <p>13 you get that from?</p> <p>14 A. From gambling and my kids' mother.</p> <p>15 Q. Not from drug deals?</p> <p>16 A. No, not from drugs.</p> <p>17 Q. Now, you described the situation</p> <p>18 where you would be told to put a pack of money in</p> <p>19 your back pocket, is that correct?</p> <p>20 A. Yes.</p> <p>21 Q. And then during the -- so I'm trying</p> <p>22 to understand how this happened. Who would tell</p> <p>23 you to put the money in the back of your pocket?</p> <p>24 A. Mohammed used to be the one to come</p>	<p style="text-align: center;">Page 208</p> <p>1 happen to the money after Mohammed took it?</p> <p>2 A. They were going to split it. They</p> <p>3 were taking it. They were going to split it.</p> <p>4 Q. Did you understand -- let me strike</p> <p>5 that. During your time hanging around</p> <p>6 Ida B. Wells, other than Patrick Noonier, who you</p> <p>7 mentioned before, who was involved in dealing</p> <p>8 drugs?</p> <p>9 A. Big Shorty.</p> <p>10 Q. Wilbert Moore?</p> <p>11 A. Yes, sir. I know a lot of guys by</p> <p>12 their nicknames. I ain't know too many guys by</p> <p>13 their first name, because a lot of the kids</p> <p>14 younger than me. We never hung around. They from</p> <p>15 different buildings and stuff like that.</p> <p>16 Q. How about -- well, you mentioned</p> <p>17 Bear. Was Bear a drug dealer?</p> <p>18 A. Bear wasn't from my building, but I</p> <p>19 ran into Bear in the penitentiary. Me and Bear</p> <p>20 was in the penitentiary together, and he told me</p> <p>21 Watts put a case on him.</p> <p>22 Q. How about, do you know a guy named</p> <p>23 Fatty?</p> <p>24 A. Fatty?</p>

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<p style="text-align: right;">Page 209</p> <p>1 Q. Yes. 2 A. Yes, I know Fatty. 3 Q. Is Fatty a drug dealer at IBW? 4 A. Fatty wasn't from my building. I 5 don't know what they was doing in their building. 6 Q. By the way, what was your building? 7 574 or 575? 8 A. Both of them was my building, 574 9 and 575. 10 Q. When you say your building, you were 11 at various times authorized to sell drugs in those 12 buildings? 13 A. Not just selling drugs. Those are 14 the buildings where I was from. 15 Q. I see. Well, let me ask you a 16 question; you were aware that drug sales were 17 taking place at both of those buildings? 18 A. Yes, sir. 19 Q. And is it a fact that, generally 20 speaking, you had to have the approval of the 21 Gangster Disciples to sell in that building -- 22 those buildings? 23 MR. RAUSCHER: Object to -- no, I 24 don't have an objection. Go ahead.</p>	<p style="text-align: right;">Page 211</p> <p>1 alleged that you were involved in selling crack 2 cocaine and heroin to certain customers in a 3 neighborhood called the Square? 4 MR. RAUSCHER: Object to foundation. 5 THE WITNESS: The Square? No, I 6 never heard of the Square. 7 BY MR. PALLS: 8 Q. You never heard of the Square? 9 Okay. By the way, do you have you a sister named 10 Shantae? 11 A. Shantae? No. No, sir. 12 Q. That's not your sister? 13 A. No, sir. 14 Q. Did you plead guilty to a conspiracy 15 to store packaged crack cocaine in an apartment 16 inside the Square? 17 A. I don't know what the Square is. 18 Q. All right. Let me ask you this; 19 have you ever spent time in federal prison? 20 A. No, sir. 21 Q. You have never spent time in federal 22 prison? No? 23 A. No, sir. 24 Q. Okay. All right. During the time</p>
<p style="text-align: right;">Page 210</p> <p>1 THE WITNESS: Maybe, depending on 2 who he was, yes. 3 BY MR. PALLS: 4 Q. Okay. I want to ask you a question 5 now. A few minutes ago we went through your 6 criminal history; right? You said, if I'm not 7 mistaken, that Tony had covered just about 8 everything that you can remember; right? 9 A. That Tony covered everything that I 10 can remember? 11 Q. Yes. He went through a criminal 12 history, and he said at the end, "Is that it?" 13 And you said -- and I believe you said, "Yes, 14 that's it," I believe, your felony convictions and 15 your misdemeanor arrests? 16 A. Correct, the ones that I remember. 17 Correct. 18 Q. Let me ask you this; do you recall 19 be indicted in connection with a criminal drug 20 conspiracy by the United States Government back in 21 2006? 22 A. I don't think that was 2006. I 23 think that was 2005. 24 Q. Well, let me ask you this; was it</p>	<p style="text-align: right;">Page 212</p> <p>1 of your 2004 arrest, were you ever separated from 2 Taurus Smith? 3 A. Yes. 4 Q. When did that take place? 5 A. When they took me in the hallway to 6 strip search us one by one, and then when they 7 drove me to the police station in the squad car by 8 myself. 9 Q. And other than that, you were -- and 10 other than that, were you in his constant company? 11 A. Besides those two times, the only 12 two times I was separated from Taurus on that day, 13 yes. 14 Q. Was he present with you when you had 15 the discussion with Sergeant Watts over charging 16 Crystal Looney? 17 A. Yes. I started crying in front of 18 everybody. I dropped to my knees and started 19 crying. 20 Q. When was the first time you heard 21 the phrase "clean up"? 22 A. When I came home from boot camp, 23 when everybody was over there hanging in the 24 building, started hanging in the buildings, and I</p>

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<p>1 went over there, and my first time, and I'm like, 2 what the "F" is that? They said that means police 3 is coming.</p> <p>4 Q. Okay. I think that's all the 5 questions I have. Thank you.</p> <p>6 ---</p> <p>7 EXAMINATION</p> <p>8 BY MR. KOSOKO:</p> <p>9 Q. Hello, Mr. James. My name is Ahmed 10 Kosoko. I represent Ronald Watts. I have a few 11 questions for you.</p> <p>12 When did Ms. Looney first learn that 13 you sell drugs?</p> <p>14 A. Excuse me?</p> <p>15 Q. What year did Crystal Looney learn 16 that you sell drugs?</p> <p>17 MR. RAUSCHER: Object to foundation.</p> <p>18 THE WITNESS: Well, she knew I had a 19 drug case in 1998 and another one in, like, 2002 20 or 2003.</p> <p>21 BY MR. KOSOKO:</p> <p>22 Q. Did she know you sold drugs?</p> <p>23 A. Yes.</p> <p>24 Q. Did Theresa Smith know that you sold</p>	<p>1 this affidavit, is that correct, Mr. James?</p> <p>2 A. Yes, sir.</p> <p>3 Q. And Mr. Zecchin asked you which 4 paragraphs you wanted to amend or change, is that 5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. You told him you had no other 8 changes?</p> <p>9 A. Yes, that's correct.</p> <p>10 Q. Is Paragraph 11 in this affidavit, 11 is it incorrect?</p> <p>12 A. No, that is correct. That is 13 correct.</p> <p>14 Q. Were you mistaken when you told me 15 that you didn't tell any public defender until 16 2007 that you were framed?</p> <p>17 A. No. That's the public defender that 18 didn't believe me, and that's how I ended up 19 taking the plea deal. It was just chaotic.</p> <p>20 Q. Let me go back to my initial 21 question, because I don't want to cross you up.</p> <p>22 Which court date did you tell your 23 public defender that you were framed about your 24 April 3rd, 2004 arrest?</p>
<p style="text-align: center;">Page 214</p> <p>1 drugs?</p> <p>2 A. At some point in time, yes, but we 3 was never cool or "conversed" really like that.</p> <p>4 Q. What year did Ms. Smith learn that 5 you were a drug dealer?</p> <p>6 A. She assumed I was a drug dealer 7 maybe in 2001 or 2002, when I had got back with 8 her sister.</p> <p>9 Q. Okay. In regards to your April 3rd, 10 2004 arrest, how many court dates did you have for 11 that case?</p> <p>12 A. Maybe two or three.</p> <p>13 Q. When did you first tell your public 14 defender you had been framed?</p> <p>15 A. That was in my 2007 arrest.</p> <p>16 Q. So you never told your public 17 defender that you were framed for your 2004 18 arrest?</p> <p>19 A. No.</p> <p>20 MR. KOSOKO: Can we pull up 21 Exhibit 3, please? If we go to Paragraph 11, 22 please.</p> <p>23 BY MR. KOSOKO:</p> <p>24 Q. You spoke with Mr. Zecchin about</p>	<p style="text-align: center;">Page 216</p> <p>1 MR. RAUSCHER: Object to form.</p> <p>2 THE WITNESS: I forgot which court 3 date it exactly was. I think that's the day I 4 took the plea deal.</p> <p>5 BY MR. KOSOKO:</p> <p>6 Q. So you didn't tell the public 7 defender everything in bond court, that you were 8 framed; correct?</p> <p>9 A. No.</p> <p>10 Q. And you didn't tell the judge that 11 you were framed; correct?</p> <p>12 A. No.</p> <p>13 Q. And you didn't tell anybody on that 14 court date that you had been framed, is that 15 correct?</p> <p>16 A. Correct.</p> <p>17 Q. After your bond court date, what's 18 the next time you were in court for your 2004 19 arrest, April 3rd?</p> <p>20 A. On my arraignment.</p> <p>21 Q. And you pled guilty on your 22 arraignment, is that correct?</p> <p>23 A. I'm not quite sure if that's the 24 date I pled guilty. It might be. I'm not quite</p>

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<p style="text-align: center;">Page 217</p> <p>1 sure.</p> <p>2 Q. This was a significant incident in 3 your life; right, Mr. James?</p> <p>4 A. Correct.</p> <p>5 Q. It stands out; correct? You were 6 framed for a crime you didn't commit?</p> <p>7 A. Yes.</p> <p>8 Q. How many court dates did you have 9 regarding this case?</p> <p>10 A. I can't remember back then. It's so 11 long ago.</p> <p>12 Q. Okay. It was a long time ago, but 13 you remember specific quotes that were stated back 14 in 2004?</p> <p>15 A. Yes, because I remember all his 16 quotes. That's how I --</p> <p>17 Q. Do you remember your public 18 defender's name?</p> <p>19 A. No, not at the time. It was a 20 female public defender with brown, "blondey" hair.</p> <p>21 Q. What did your state's attorney look 22 like that handled your case?</p> <p>23 A. I can't remember the state's 24 attorney. I remember --</p>	<p style="text-align: center;">Page 219</p> <p>1 Q. You told that public defender you 2 had been framed, though, is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. What was your public defender's 5 response?</p> <p>6 A. Blew me off like a whistle.</p> <p>7 Q. Blew you like what?</p> <p>8 A. Like a whistle.</p> <p>9 Q. Like a whistle?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And then what else did you 12 guys -- when you say blew you off, could you go 13 into specifics for me? What do you mean by that?</p> <p>14 A. She basically laughed at us and told 15 us that wasn't nobody going to believe us, that he 16 was a sergeant, told us that we were crazy; it's a 17 good plea deal. Just take the deal, and we'll be 18 out of jail later on that evening.</p> <p>19 Q. Did you tell her that the mother of 20 your children could be a potential witness for 21 you?</p> <p>22 A. Yes.</p> <p>23 Q. And she still disregarded it, is 24 that correct?</p>
<p style="text-align: center;">Page 218</p> <p>1 Q. How long after your bond court date 2 was your arraignment date?</p> <p>3 A. Maybe two to three weeks, I believe.</p> <p>4 Q. Two to three weeks? Okay. What was 5 your judge you had that you that arraignment on?</p> <p>6 A. I can't remember the exact judge on 7 that case.</p> <p>8 Q. Was it a male or a female?</p> <p>9 A. I can't remember that case, it's 10 been that long.</p> <p>11 Q. Was it a black person or a white 12 person?</p> <p>13 A. I believe it was Judge Ford, if I'm 14 not mistaken.</p> <p>15 Q. Is Judge Ford a male or a female?</p> <p>16 A. That's a male.</p> <p>17 Q. Was Judge Ford your judge for the 18 2004 case?</p> <p>19 A. I can't remember. I'm trying to see 20 who was my judge in that case. I can't remember 21 right off the top of my head who was my judge.</p> <p>22 Q. Did you tell that judge that you had 23 been framed?</p> <p>24 A. No.</p>	<p style="text-align: center;">Page 220</p> <p>1 A. Just blew me off like a whistle. 2 Didn't want to investigate --</p> <p>3 Q. You said what?</p> <p>4 A. She didn't even want to go send no 5 investigators out to even investigate it.</p> <p>6 Q. Okay. Did you tell Crystal Looney 7 to get you a private attorney after that?</p> <p>8 A. Yes.</p> <p>9 Q. Why didn't you retain a private 10 attorney?</p> <p>11 A. We didn't have money. We had tried 12 to. We didn't have the money.</p> <p>13 Q. When did you start making big money 14 gambling?</p> <p>15 A. I always made big money gambling, 16 but gambling goes both ways. You can win \$10,000 17 today, and you can lose \$15,000 tomorrow.</p> <p>18 Q. But gambling wasn't your only source 19 of income; correct?</p> <p>20 MR. RAUSCHER: Object to form.</p> <p>21 THE WITNESS: Besides the help of my 22 kids' mother, that's the only source of two 23 incomes I had at that time, yes.</p> <p>24 MR. KOSOKO: Can we pull up Exhibit</p>

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<p>1 Number 2, please?</p> <p>2 BY MR. KOSOKO:</p> <p>3 Q. And you went over this document with</p> <p>4 Mr. Zecchin earlier, is that correct, Mr. James?</p> <p>5 A. Yes.</p> <p>6 Q. And that's your signature there,</p> <p>7 blah, blah, blah --</p> <p>8 MR. RAUSCHER: Hold on. Hold on.</p> <p>9 He didn't go over those. Tony didn't show him.</p> <p>10 MR. KOSOKO: Let's go to Exhibit 1</p> <p>11 then.</p> <p>12 BY MR. KOSOKO:</p> <p>13 Q. Did Mr. Zecchin show you this</p> <p>14 document?</p> <p>15 A. Yes, I believe he did. Yes.</p> <p>16 Q. If we could go to -- and these were</p> <p>17 your supplemental answers, is that correct? I</p> <p>18 want to make sure I'm getting this right.</p> <p>19 A. Yes.</p> <p>20 MR. KOSOKO: If we could go to</p> <p>21 Paragraph Number -- actually, Question Number 7.</p> <p>22 Thank you.</p> <p>23 BY MR. KOSOKO:</p> <p>24 Q. Do you recall being asked that</p>	<p>1 and my son's head. That's why I was --</p> <p>2 Q. So after that day you were released;</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. And that court date, do you remember</p> <p>6 what month that was?</p> <p>7 A. No, sir.</p> <p>8 Q. If it was May of 2004, would I be</p> <p>9 incorrect in stating that?</p> <p>10 A. Okay.</p> <p>11 Q. Does that sound correct to you?</p> <p>12 A. (No response.)</p> <p>13 Q. When was the next time you started</p> <p>14 selling drugs after Judge Ford gave you probation?</p> <p>15 A. May of 2004?</p> <p>16 Q. You went back and started selling</p> <p>17 drugs again?</p> <p>18 A. I can't recall. I don't believe --</p> <p>19 I'm not sure.</p> <p>20 Q. Now, if we could stick on this</p> <p>21 answer, you stated that you sold cocaine and</p> <p>22 heroin approximately in the 2002 to 2004 time</p> <p>23 period, is that correct?</p> <p>24 A. Yes.</p>
<p style="text-align: center;">Page 222</p> <p>1 question and the answer that you gave, Mr. James?</p> <p>2 A. Yes.</p> <p>3 Q. And so your other source of income</p> <p>4 was selling cocaine and heroin; correct?</p> <p>5 A. In 2002 to 2004, yes.</p> <p>6 Q. But you were arrested in 2004;</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. So your other source of income was</p> <p>10 selling cocaine and heroin; correct?</p> <p>11 A. Yes.</p> <p>12 Q. What happened to all that money?</p> <p>13 A. I had some money paid up, and then,</p> <p>14 like I said, that day I got arrested on the 2004</p> <p>15 Watts case, they kept the money I had on me. You</p> <p>16 don't never come outside with all your money that</p> <p>17 you done won again.</p> <p>18 Q. So why didn't you use the money that</p> <p>19 you had stashed to retain a private attorney</p> <p>20 instead of the public defender before you pleaded</p> <p>21 guilty?</p> <p>22 A. Because I had left Ms. Looney out</p> <p>23 here on her own, and we was behind on our bills,</p> <p>24 and she was the money to keep the roof over her</p>	<p style="text-align: center;">Page 224</p> <p>1 Q. And then your next sentence says</p> <p>2 that you received those drugs from Big Shorty. So</p> <p>3 from 2002 to 2004, you sold drugs that you</p> <p>4 received from Big Shorty; correct?</p> <p>5 A. Yes.</p> <p>6 Q. Did Big Shorty front you that, or</p> <p>7 did you buy it and flip it?</p> <p>8 A. I was just running the building for</p> <p>9 him.</p> <p>10 Q. So you were just -- it was on</p> <p>11 consignment, or you were just running the building</p> <p>12 for Big Shorty?</p> <p>13 A. I was just running the building for</p> <p>14 Big Shorty.</p> <p>15 Q. So it was never your dope? You were</p> <p>16 just a building manager for Big Shorty from 2002</p> <p>17 to 2004?</p> <p>18 A. Yes, the overseer of the building.</p> <p>19 Q. How much did Big Shorty pay you to</p> <p>20 be a building manager?</p> <p>21 A. \$7,000 to \$10,000 a week.</p> <p>22 Q. And your next sentence says that you</p> <p>23 also sold cocaine and heroin in or around 2007, is</p> <p>24 that correct?</p>

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<p style="text-align: center;">Page 225</p> <p>1 A. Yes.</p> <p>2 Q. You received those drugs from</p> <p>3 Patrick Noonan; right?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And Patrick Noonan's nickname</p> <p>6 is Padiac (phonetic); right?</p> <p>7 A. Correct.</p> <p>8 Q. Did you have the same deal that you</p> <p>9 had with Big Shorty with Padiac?</p> <p>10 A. Yes.</p> <p>11 Q. So you were -- which building were</p> <p>12 you a building manager in 2007?</p> <p>13 A. We lost the building. There wasn't</p> <p>14 no more building. I mean, the last building we</p> <p>15 had was 574.</p> <p>16 Q. Okay. Why didn't you put that you</p> <p>17 sold drugs in 2005 in this interrogatory?</p> <p>18 A. I was locked up in 2005. They just</p> <p>19 came and charged me in 2005. I was still</p> <p>20 incarcerated in the penitentiary.</p> <p>21 Q. So is it your testimony you never</p> <p>22 sold any drugs in 2005?</p> <p>23 A. I believe I was still locked up in</p> <p>24 2005. I never came home.</p>	<p style="text-align: center;">Page 227</p> <p>1 that you were incarcerated for the entire year of</p> <p>2 2005?</p> <p>3 A. I'm not sure. I don't believe --</p> <p>4 I'm not sure, not to my recollection.</p> <p>5 Q. What about March 31st, 2005, were</p> <p>6 you out there then?</p> <p>7 A. I'm not sure. I'm not sure -- I</p> <p>8 violated that probation, and they sent me back. I</p> <p>9 think that was the end of 2004. I'm not quite</p> <p>10 sure.</p> <p>11 Q. Would you consider this to be a</p> <p>12 significant moment in your life, Mr. James?</p> <p>13 MR. RAUSCHER: Object to form.</p> <p>14 BY MR. KOSOKO:</p> <p>15 Q. You can answer, Mr. James.</p> <p>16 A. Excuse me, I didn't understand your</p> <p>17 question.</p> <p>18 Q. Well, would you consider that case</p> <p>19 you picked up in 2005 to be a significant moment</p> <p>20 in your life?</p> <p>21 A. The conspiracy case?</p> <p>22 Q. Yes, sir.</p> <p>23 A. I was in a penitentiary. It didn't</p> <p>24 even really matter to me, to be honest with you.</p>
<p style="text-align: center;">Page 226</p> <p>1 Q. So on February 9th, 2005, you</p> <p>2 weren't at the 574 building with Ronald Hendricks,</p> <p>3 Warren Brakes, and Marlon Pettis (phonetic),</p> <p>4 selling drugs?</p> <p>5 A. I can't recall the date. I don't</p> <p>6 know. I believe I was still locked up. I'm not</p> <p>7 quite sure.</p> <p>8 Q. So if an undercover officer bought</p> <p>9 drugs from you, Ronald Hendricks, Warren Brakes,</p> <p>10 and Marlon Pettis, he would incorrect?</p> <p>11 A. I'm not going to say the officer be</p> <p>12 incorrect. I believe the conspiracy was before</p> <p>13 2005. They just came to serve me in 2005, because</p> <p>14 they couldn't locate me at first.</p> <p>15 Q. So you're saying you never sold</p> <p>16 drugs in 2005; correct?</p> <p>17 A. I don't believe I was outside of</p> <p>18 prison 2005.</p> <p>19 Q. That's not what I'm asking you.</p> <p>20 What I'm asking you, did you ever sell drugs in</p> <p>21 2005?</p> <p>22 A. I can't remember, to my</p> <p>23 recollection.</p> <p>24 Q. So did you -- is it your testimony</p>	<p style="text-align: center;">Page 228</p> <p>1 I didn't know --</p> <p>2 Q. But you pled guilty to conspiracy;</p> <p>3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. And that conspiracy charge was --</p> <p>6 you pled guilty on October 27th, 2005; correct?</p> <p>7 A. Correct.</p> <p>8 Q. In front of Judge Egan, is that</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. So why didn't you put that, that you</p> <p>12 were selling drugs in 2005 in this interrogatory?</p> <p>13 A. I came from the penitentiary, and</p> <p>14 received that time. I was already locked up</p> <p>15 still.</p> <p>16 Q. Right. But you pled guilty to</p> <p>17 selling drugs in 2005; that's what this conspiracy</p> <p>18 is about.</p> <p>19 A. I must have misunderstood the</p> <p>20 question. I don't believe I was home.</p> <p>21 Q. You were home?</p> <p>22 A. I don't believe I was at home.</p> <p>23 Q. Okay. So why would you plead guilty</p> <p>24 to a conspiracy that involved distributing drugs</p>

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<p style="text-align: right;">Page 229</p> <p>1 in the year 2005?</p> <p>2 A. I was already in prison, the stuff 3 they was taking you through in prison at the time. 4 I just didn't want to keep going back and forth, 5 the stuff I was going through, packing all my 6 stuff up. I was settled in already.</p> <p>7 Q. All right. Earlier you mentioned 8 someone by the name of Tywon. Is that Tywon 9 Booten (phonetic)?</p> <p>10 A. Tywon Birmingham.</p> <p>11 Q. You know him as Birmingham?</p> <p>12 A. Booten, Birmingham, something like 13 that, yes.</p> <p>14 Q. You also know Brian Ford; correct?</p> <p>15 A. Brian Ford?</p> <p>16 Q. B-Love. You sold drugs with Brian 17 Ford sometimes; right?</p> <p>18 A. On occasion, yes.</p> <p>19 Q. You sold drugs with Marlin Fetta 20 (phonetic) sometimes; right?</p> <p>21 A. I don't know who that is.</p> <p>22 Q. You sold drugs with Louis Moore 23 sometimes; right?</p> <p>24 A. I don't know who that is.</p>	<p style="text-align: right;">Page 231</p> <p>1 been included in that list, are there any other 2 names you would like to add?</p> <p>3 MR. RAUSCHER: Object to form.</p> <p>4 THE WITNESS: You might have to say 5 their nicknames, because that's how I know people, 6 by their nicknames. I don't know them by their 7 government names.</p> <p>8 BY MR. KOSOKO:</p> <p>9 Q. When did you first find out that 10 Sergeant Watts had been arrested?</p> <p>11 A. I don't know what year he got 12 arrested, but I believe I was in the penitentiary, 13 on my way home from the penitentiary.</p> <p>14 Q. What year was that, sir?</p> <p>15 A. I believe it was 2010.</p> <p>16 Q. You learned Sergeant Watts had been 17 arrested in 2010?</p> <p>18 A. I'm not quite sure. It was either 19 2009 or 2010, one of the two, yes.</p> <p>20 Q. How did you learn that Sergeant 21 Watts had been arrested in 2009 or 2010?</p> <p>22 A. It was on the news.</p> <p>23 Q. What did you do after you learned 24 that he had been arrested?</p>
<p style="text-align: right;">Page 230</p> <p>1 Q. Slick.</p> <p>2 A. I knew a Slick. I never sold drugs 3 with Slick.</p> <p>4 Q. What about Allen Jackson?</p> <p>5 A. Yes. That's my friend, yes.</p> <p>6 Q. Allen Jackson is your friend; 7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. Do you still hang with Allen 10 Jackson?</p> <p>11 A. From time to time, yes.</p> <p>12 Q. Mr. Zecchin asked you earlier about 13 the other people who sued in this case and the 14 other people from the Wells. Why would you admit 15 Allen Jackson's name?</p> <p>16 MR. RAUSCHER: Objection. Form. 17 Misstates the question and the answer.</p> <p>18 THE WITNESS: I know a lot of 19 people. All these names just don't come to the 20 top of my head. The Ida B. Wells project is big. 21 I know --</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q. Now that I have refreshed your 24 recollection that Alan James' name should have</p>	<p style="text-align: right;">Page 232</p> <p>1 A. I said, "They finally got his ass."</p> <p>2 Q. Did you contact the Cook County 3 State's Attorney's office?</p> <p>4 A. No.</p> <p>5 Q. What did you understand that 6 Sergeant Watts had been arrested for?</p> <p>7 A. I didn't really understand why he 8 was -- they just said on corrupt charges. I never 9 really took the time to find out right then and 10 there what he had been arrested for.</p> <p>11 Q. Have you taken any time since then 12 to find out what the circumstances of his arrest 13 was?</p> <p>14 A. From what I hear, he was trying to 15 extort somebody, and they had a wire or something 16 on him, and he got caught on a wiretap or 17 something.</p> <p>18 Q. You said he was trying to extort 19 someone? That's what you heard?</p> <p>20 A. Yes.</p> <p>21 Q. When did you first learn that you 22 could get money from the Watts' cases?</p> <p>23 A. I didn't really learn that until 24 some of my friends was like, The lawyers are</p>

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<p style="text-align: center;">Page 233</p> <p>1 trying to get ahold of you. I'm like, what are 2 they trying to get ahold of me for? I wasn't even 3 pursuing it.</p> <p>4 Q. What year was this? 5 A. I believe in 2018, maybe 2017, 2018.</p> <p>6 Q. Do you know Diamond Drey? 7 A. Yes, I know Diamond Drey.</p> <p>8 Q. Who is Diamond Drey? 9 A. He is high-ranking member for the 10 Gangster Disciples.</p> <p>11 Q. And you're a Gangster Disciple; right? 12 A. Correct.</p> <p>13 Q. Did you give Diamond Drey any of your money? 14 A. No, sir.</p> <p>15 Q. Is Ben Baker a Gangster Disciple? 16 A. I'm not sure. I'm not from Ben 17 Baker's building. I don't know what Ben Baker is.</p> <p>18 Q. Who from your building has filed a 19 lawsuit? 20 A. Me --</p> <p>21 MR. RAUSCHER: Object to foundation. 22 BY MR. KOSOKO:</p>	<p style="text-align: center;">Page 235</p> <p>1 to the station, I'm talking about they transported 2 him in the paddy wagon, and they took me in the 3 car, and we went to the station. The car was 4 right behind the paddy wagon, and we all met up at 5 the station together.</p> <p>6 Q. So Taurus went in the paddy wagon, and you went in the car, is that correct? 7 A. Yes.</p> <p>8 Q. So if the wagon said it transported you also, that would be incorrect? 9 A. Yes.</p> <p>10 Q. So you weren't transported in the wagon at 12:45 p.m.? 11 A. No, I was transported in the police car with Sergeant Watts and Officer Jones.</p> <p>12 Q. So, again, I'm going to ask you again -- you are able to read; right? You are able to read, and you signed off; correct? 13 MR. RAUSCHER: Object to form. 14 BY MR. KOSOKO: 15 Q. So is it your testimony that Al Jones drove the wagon also? 16 A. Alvin Jones was driving the police car while --</p>
<p style="text-align: center;">Page 234</p> <p>1 Q. I'm sorry, can you start your answer again? 2 A. From what I know of, me, Al. I 3 don't know all those guy's names. Me, Al, 4 Christopher Scott. Those are the only names that 5 I know from my building, off the top. I know 6 nicknames.</p> <p>7 Q. From your 2004 arrest, who 8 transported you to the police station? 9 A. Sergeant Watts and Alvin Jones.</p> <p>10 Q. Did they transport you and Taboo? 11 A. No, Taboo was in the wagon. I got 12 in the police car with them. They put me in the 13 police car with them.</p> <p>14 Q. So they did not transport you together? 15 A. No, sir.</p> <p>16 MR. KOSOKO: Can we go back to 17 Exhibit Number 3? 18 BY MR. KOSOKO: 19 Q. Paragraph 9. Could you tell me 20 which one your testimony under oath is incorrect? 21 Is it Paragraph 9 or what you just told me? 22 A. When I say Jones drove me and Taurus</p>	<p style="text-align: center;">Page 236</p> <p>1 Q. So read Paragraph 9 again, please, Mr. James. So which one is wrong, Mr. James? 2 MR. RAUSCHER: Object to form. I 3 think that is harassing. It is asked and 4 answered.</p> <p>5 BY MR. KOSOKO: 6 Q. Is your testimony today accurate, Mr. James? 7 A. No, it is accurate, because Taurus 8 was in the wagon, and I was right behind him in 9 the police car.</p> <p>10 Q. Okay. So Jones drove me and Taurus to the station. So is it your testimony that Al Jones drove both the wagon and his police car to the police station? 11 A. Alvin Jones drove the police car to 12 the police station. Sergeant Watts was in the 13 passenger seat. I was in the backseat. Taurus 14 Smith was in the paddy wagon with everyone else.</p> <p>15 Q. So that is incorrect by saying, Jones drove me and Taurus to the station? That is an incorrect statement; correct? 16 A. No. What I mean by Jones drove me 17 and Taurus to the station, Jones took the people</p>

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<p style="text-align: right;">Page 237</p> <p>1 to the station. Watts went back to the building 2 after he dropped us off at the station. Jones 3 escorted us in the station. Watts left and got my 4 kids' mother.</p> <p>5 Q. Is sentence one in Paragraph 9 6 accurate or inaccurate, Mr. James?</p> <p>7 MR. RAUSCHER: Asked and answered. 8 THE WITNESS: It is accurate.</p> <p>9 BY MR. KOSOKO:</p> <p>10 Q. It's accurate? Mr. Zecchin gave you 11 an opportunity to change this. I'm going to give 12 you another opportunity. Can you read over it and 13 tell us what else is inaccurate about this 14 affidavit?</p> <p>15 A. It should have been Jones drove me 16 to the station, and Taurus was in the wagon.</p> <p>17 Q. Why did you file this with the Court 18 to get your exoneration when it had so many 19 incorections in it?</p> <p>20 MR. RAUSCHER: Object to form. 21 THE WITNESS: Maybe just the way I 22 talk, like a different language. When I say Jones 23 drove me and Taurus to the station, I mean when we 24 got to the station, Jones took us in there, and</p>	<p style="text-align: right;">Page 239</p> <p>1 Q. When you pled guilty, did they read 2 the factual basis to the Court?</p> <p>3 A. Yes.</p> <p>4 Q. Did the factual basis include the 5 name Ronald Watts at all?</p> <p>6 A. I can't recollect back that long. I 7 was 24 then. I don't know.</p> <p>8 Q. Did the factual basis involve an 9 admission to selling drugs at all?</p> <p>10 A. I can't remember back that long 11 about what the thing said.</p> <p>12 Q. But this was a significant moment in 13 your life; right?</p> <p>14 A. Yes.</p> <p>15 Q. Now, going back to Exhibit Number 3. 16 When did you give this testimony? What date?</p> <p>17 A. On Exhibit 3?</p> <p>18 Q. Yes, sir.</p> <p>19 MR. RAUSCHER: Object to form. 20 THE WITNESS: I can't recall quite 21 the day I gave the testimony.</p> <p>22 BY MR. KOSOKO:</p> <p>23 Q. Well, do you remember what year it 24 was?</p>
<p style="text-align: right;">Page 238</p> <p>1 Watts pulled back off. That's what I mean Jones 2 drove us to the station. He didn't want to walk 3 us in the station.</p> <p>4 Q. Did you go back and tell Kim Foxx or 5 Judge Morton that this was incorrect?</p> <p>6 A. No, sir.</p> <p>7 Q. Now, you testified earlier that you 8 took the weight because they threatened to put it 9 on Crystal Looney, is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. Do you remember the facts that you 12 pled guilty to, Mr. James?</p> <p>13 MR. RAUSCHER: Object to form. 14 THE WITNESS: I think it was Class 4 15 felony, or Class 1 felony, or Class 2 -- I don't 16 know the exact class of the case.</p> <p>17 BY MR. KOSOKO:</p> <p>18 Q. Right. But did you go over the 19 arrest reports with your public defender?</p> <p>20 A. On the 2004 arrest?</p> <p>21 Q. Yes, sir. I'm still just talking 22 about the 2004 arrest.</p> <p>23 A. Not really. They were just blowing 24 us off at the time.</p>	<p style="text-align: right;">Page 240</p> <p>1 A. Are we still talking about the 2004 2 arrest?</p> <p>3 Q. Right.</p> <p>4 A. I don't have Exhibit 3 in front of 5 me.</p> <p>6 Q. I'm sorry, you were cutting out, 7 Mr. James. I apologize. I didn't hear you.</p> <p>8 A. Are we still talking about the 2004 9 arrest?</p> <p>10 Q. Yes, sir. That affidavit, the 2004 11 arrest.</p> <p>12 A. And your question was what?</p> <p>13 Q. When did you give the testimony in 14 this affidavit?</p> <p>15 A. I can't recall quite the day I gave 16 the testimony.</p> <p>17 Q. Can you give me the year you gave 18 it?</p> <p>19 A. Maybe in 2004.</p> <p>20 Q. Pardon me, sir? I'm sorry.</p> <p>21 A. I'm not quite sure.</p> <p>22 Q. I'm sorry, Mr. James. I couldn't 23 hear you.</p> <p>24 A. No problem. I'm not quite sure when</p>

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1 I gave the testimony.

2 **Q. Why didn't you put your 2007 arrest**
3 **in this affidavit also?**

4 A. I don't know.

5 MR. KOSOKO: No further questions.

6 Thank you.

7 MR. RAUSCHER: Are we done, or do
8 any other defendants have any?

9 MR. ZIBOLSKI: No questions.

10 MS. HARRIS: No questions.

11 MR. ZECCHIN: I don't think I have
12 anything more for individual officers either.

13 Now, reserve or waive?

14 MR. RAUSCHER: We'll reserve.

15 THE VIDEOGRAPHER: This is the end
16 of the deposition. This is the end of today's
17 testimony. The time is 3:10 p.m., and the running
18 length of this deposition is four hours,
19 20 minutes and 10 seconds. We are now off the
20 record.

21 (Signature reserved.)

22 - - -

23 (Whereupon, at 3:10 p.m.,
24 proceedings are concluded.)

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1 STATE OF ILLINOIS)
2) SS.
2 COUNTY OF COOK)

3

4

5 I, Mary M. Rocco, Certified
6 Shorthand Reporter and Registered Professional
7 Reporter, do hereby certify that on
8 September 21st, 2021, the deposition of the
9 witness, SHAUN JAMES, called by the Defendants,
10 was taken via videoconference before me, reported
11 stenographically, and was thereafter reduced to
12 typewriting under my direction.

13 The said deposition was taken via
14 videoconference, and there were present counsel,
15 all via videoconference, as previously set forth.

16 The said witness, SHAUN JAMES, was
17 first duly sworn to tell the truth, the whole
18 truth, and nothing but the truth, and was then
19 examined upon oral interrogatories.

20 I further certify that the foregoing
21 is a true, accurate, and complete record of the
22 questions asked of and answers made by the said
23 witness, SHAUN JAMES, at the time and place
24 hereinabove referred to.

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Mary Rocco

MARY M. ROCCO, CSR, RPR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851

19 CSB No. 084-004539

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21

22

23

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

4 In re: WATTS COORDINATED)
5 PRETRIAL PROCEEDINGS,) No: 19 CV 01717
6)
7

8 I, SHAUN JAMES, hereby acknowledge that
9 I have read the foregoing transcript of the
10 testimony given by me at my videotaped deposition
11 on September 21st, 2021, and that said transcript
12 constitutes a true and correct record of the
13 testimony given by me at said deposition except as
14 I have so indicated on the errata sheets provided
15 herein.

16

17 _____
18 SHAUN JAMES
19 No corrections (Please initial) _____
20 Number of errata sheets submitted _____ (pgs.)

21 _____
22 SUBSCRIBED AND SWORN to
23 Before me this _____ day
24 Of _____, 2022.

25 _____
26 NOTARY PUBLIC
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