

Exhibit 21



Transcript of the Deposition of
Ben Baker

Case: In Re: Watts Coordinated Pretrial Proceedings
Taken On: August 9, 2023

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

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 1

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

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

The videotaped deposition of BEN BAKER,
called by the Defendant for examination, taken pursuant
to notice and pursuant to the Federal Rules of Civil
Procedure for the United States District Courts
pertaining to the taking of depositions, taken before
Brianna Uhlman, Certified Shorthand Reporter and
Registered Professional Reporter, at 311 South Wacker
Drive, Suite 5200, Chicago, Illinois, commencing at
10:13 a.m. on August 9, 2023.

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 2

1 APPEARANCES:

2

3 LOEJVY & LOEJVY
4 MR. JOSHUA TEPFER
5 311 North Aberdeen Street
6 3rd Floor
7 Chicago, Illinois 60607
8 Phone: 312.243.5900
9 E-mail: josh@loevy.com

10

11 On behalf of the Plaintiffs Ben Baker;
12 Marcus Gibbs; Leonard Gipson; Allen Jackson;
13 Shaun James; Thomas Jefferson; Anthony
14 McDaniels; Andre McNairy; Lee Rainey; Jamell
15 Sanders; Frank Saunders; Christopher Scott;
16 Taurus Smith; Henry Thomas; Phillip Thomas;
17 Lionel White, Jr.; and Lionel White, Sr.;

18

19 LAW OFFICES OF KENNETH N. FLAXMAN, P.C.
20 MR. JOEL A. FLAXMAN (via videoconference)
21 200 South Michigan Avenue
22 Suite 201
23 Chicago, Illinois 60604
24 Phone: 312.427.3200
E-mail: jaf@kenlaw.com

15

16 On behalf of the Plaintiffs Ben Baker;
17 Harvey Blair; William Carter; Joshua Curtis;
18 Robert Forney; Rickey Henderson; Goleather
19 Jefferson; Nephus Thomas; George Ollie;
20 Bruce Powell; Angelo Shenault, Sr.;
21 Angelo Shenault, Jr.; and Vondell Wilburn;

22

23 MOHAN GROBLE SCOLARO
24 MR. ERIC S. PALLE (via videoconference)
25 55 West Monroe Street
26 Suite 1600
27 Chicago, Illinois 60603
28 Phone: 312.422.9999
E-mail: epalles@mohangroble.com

29

30 On behalf of the Defendant Kallatt Mohammed;

31

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 3

1 APPEARANCES (continued) :

2

3 HALE & MONICO, LLC
4 MR. WILLIAM E. BAZAREK
5 53 West Jackson Boulevard
6 Suite 337
7 Chicago, Illinois 60604
8 Phone: 312.341.9646
9 E-mail: web@halemonico.com

10

11 On behalf of the Defendants Alvin Jones;
12 Elsworth Smith, Jr.; and Lamonica Lewis;

13 JOHNSON & BELL, LTD.

14 MR. BRIAN P. GAINER (via videoconference)
15 33 West Monroe Street
16 Suite 2700
17 Chicago, Illinois 60603
18 Phone: 312.372.0770
19 E-mail: gainerb@jbltd.com

20 On behalf of the Defendant Ronald Watts;

21 LEINENWEBER BARONI & DAFFADA, LLC
22 MS. MEGAN K. McGRATH (via videoconference)
23 120 North LaSalle Street
24 Suite 2000
25 Chicago, Illinois 60602
26 Phone: 866.786.3705
27 E-mail: mkm@ilesq.com

28 On behalf of the Defendants Mathew Cadman and
29 Michael Spaargaren;

30 REITER BURNS
31 MS. DHAVIELLA N. HARRIS
32 311 South Wacker Drive
33 Suite 5200
34 Chicago, Illinois 60606
35 Phone: 312.982.0090
36 E-mail: dharris@reiterburns.com

37

38 On behalf of the Defendants City of Chicago;
39 Phillip Cline; Debra Kirby; Karen Rowan; and
40 J. Bosak.

41

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 4

1 ALSO PRESENT:

2 Jaron Wilson, videographer

3 Lo Ramanujam

4 Patrick Griffin

5

6

* * * * *

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 5

1

I N D E X

2

3 WITNESS

PAGE

4 BEN BAKER

5 Examination by Mr. Bazarek..... 8

6

7

8

9

10

11

E X H I B I T S

12

13

BAKER DEPOSITION EXHIBIT

PAGE

14

No. 1..... 79

15

No. 2..... 79

16

No. 3..... 79

17

No. 4..... 172

18

No. 5..... 343

19

20

(Exhibits retained by counsel.)

21

22

23

24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p>1 THE VIDEOGRAPHER: Recording. For the record, my 2 name is Jaron Wilson of Video Instanter. I am the 3 video-recording device operator for this deposition. 4 We are at 311 South Wacker Drive, Suite 5200, 5 Chicago, Illinois 60602. This deposition is being 6 video-recorded pursuant to Federal Rules of Procedure. 7 This is the deposition of Ben Baker being taken in the 8 matter of Watts Coordinated Pretrials Procedures, 9 Case Number 19 CV 1717, in the United States District 10 Court for the Northern District of Illinois, Eastern 11 Division. Today's date is August 9, 2023, and the time 12 is 10:13 a.m. 13 Will the witness please identify yourself for 14 the record by stating your name. 15 THE WITNESS: Ben Baker. 16 THE VIDEOGRAPHER: This deposition is being 17 video-recorded at the instance of the defendant and is 18 being taken on behalf of the defendant. 19 Will the participants of this videoconference 20 please introduce themselves for the record by stating 21 your name and location, please, including those on Zoom. 22 MR. TEPFER: Josh Tepfer. I represent Ben Baker 23 and other Loevy plaintiffs in the coordinated 24 proceedings. I'm at Reiter Burns.</p>	<p>1 introduce themselves and please swear in the witness. 2 THE REPORTER: Brianna Uhlman-Jones in association 3 with Royal Reporting Services. 4 (Witness sworn.) 5 WHEREUPON: 6 BEN BAKER, 7 called as a witness herein, having been first duly 8 sworn, was examined and testified as follows: 9 EXAMINATION 10 BY MR. BAZAREK: 11 Q. Good morning, Mr. Baker. Can you state your 12 name and spell your name, please? 13 A. Ben Baker, B-E-N, B-A-K-E-R. 14 Q. Mr. Baker, as I said, my name is 15 William Bazarek. I represent a number of officers that 16 you're suing in your lawsuit. And I'm going to be 17 asking you questions today that are related to the 18 lawsuit. 19 Let me ask you, have you ever given a 20 deposition before? 21 A. Not that I know of, no. 22 Q. However, you have testified under oath; is 23 that correct? 24 A. Yes.</p>
<p>Page 7</p>	<p>Page 9</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 10	Page 12
<p>1 questions that you understand. Is that acceptable to 2 you?</p> <p>3 A. Yes.</p> <p>4 Q. Anytime today, Mr. Baker, that you want to 5 clarify an answer or you think that you misspoke, please 6 feel free to clarify or add whatever you want to some 7 previous answer that you gave. Okay?</p> <p>8 A. Okay.</p> <p>9 Q. Anytime today you want to take a break, just 10 let us know. Okay?</p> <p>11 A. Okay.</p> <p>12 Q. If you -- The questions you answer today, 13 would you agree that you're only going to ask -- Strike 14 that.</p> <p>15 To the answers that you give today to my 16 questions or any other attorneys' questions, you agree 17 that you will only answer questions that you understand?</p> <p>18 MR. TEPFER: Objection to the form.</p> <p>19 You can answer his question if you understand 20 his question.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. You know, strike that question. I'll ask you 23 another question.</p> <p>24 During this deposition, do you agree that you</p>	<p>1 Q. If you don't tell the truth in answers to 2 questions, is that wrong?</p> <p>3 MR. TEPFER: Objection: form, argumentative, 4 irrelevant.</p> <p>5 Go ahead.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes, I guess.</p> <p>8 Q. And how do you know that?</p> <p>9 A. Because you just said it.</p> <p>10 MR. TEPFER: Objection to the form of the question.</p> <p>11 Go ahead.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Because you just said it.</p> <p>14 Q. Do you know the difference between something 15 that's true versus something that's false?</p> <p>16 A. Depending on what it is, yes.</p> <p>17 Q. What does that mean, "depending on what it 18 is"?</p> <p>19 A. Well, you could tell me something, but I don't 20 know if it's true or not. So --</p> <p>21 Q. Okay. So --</p> <p>22 A. -- if I have firsthand knowledge, then, yes, I 23 would guess it was true.</p> <p>24 Q. Okay. But you have the ability to tell right</p>
<p>1 will only answer questions that you understand?</p> <p>2 A. That's the same question you just asked.</p> <p>3 Q. Okay. Can you answer the question or not?</p> <p>4 A. I mean, I will answer it if I understand it.</p> <p>5 Q. Okay. That's all I'm getting at. Okay.</p> <p>6 Mr. Baker, you filed your federal lawsuit on 7 September 15, 2016, correct?</p> <p>8 A. May -- Could be. I'm not sure of the date.</p> <p>9 Q. Okay. What year did you file your federal 10 lawsuit?</p> <p>11 A. In 2016. But I don't know the actual date.</p> <p>12 Q. Okay. And you're suing the City of Chicago 13 and a number of current and former police officers, 14 correct?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And you knew when you filed that 17 lawsuit that you would have to answer questions about 18 the lawsuit, right?</p> <p>19 A. Yes.</p> <p>20 Q. And you knew that you had to be truthful when 21 you gave answers to the questions that you were asked, 22 right?</p> <p>23 A. Well, I answered the questions as they was 24 presented. Yes.</p>	<p>1 from wrong, right?</p> <p>2 A. Yes.</p> <p>3 Q. Mr. Baker, what was your occupation in 2017?</p> <p>4 A. Well, in 2017, I started working with 5 ADE, Inc., on 130th. I was a machine operator and 6 laborer.</p> <p>7 Q. And did you receive income for that job 8 in 2017?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Did you receive any income from any 11 other job that you did?</p> <p>12 MR. TEPFER: Objection. Well, strike that.</p> <p>13 Go ahead.</p> <p>14 BY THE WITNESS:</p> <p>15 A. When? From when?</p> <p>16 Q. 2017.</p> <p>17 A. No. That was the job that I had.</p> <p>18 Q. Sir, you sold illegal narcotics in 2017, 19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. And you sold the illegal narcotics out of the 22 home that you shared with Clarissa Glenn and your 23 children, correct?</p> <p>24 A. Yes.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 14	Page 16
<p>1 Q. So you were a dope dealer in 2017, right?</p> <p>2 MR. TEPFER: Objection to the form of the question,</p> <p>3 argumentative, misstates the record.</p> <p>4 Go ahead.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Yes, I sold drugs.</p> <p>7 Q. Okay. And you sold drugs to make money,</p> <p>8 right?</p> <p>9 A. Yes.</p> <p>10 Q. And that was part of your income in 2017,</p> <p>11 correct?</p> <p>12 A. Yes. But that's not a job.</p> <p>13 Q. When you sell illegal narcotics out of the</p> <p>14 family home, what is it if it's not a job?</p> <p>15 MR. TEPFER: Objection: form, argumentative.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I thought a job was something that you</p> <p>18 collected tax from, you know, that you can claim on</p> <p>19 taxes.</p> <p>20 Q. Is a drug dealer an occupation?</p> <p>21 A. No.</p> <p>22 MR. TEPFER: Objection: form, argumentative.</p> <p>23 BY MR. BAZAREK:</p> <p>24 Q. It's not?</p>	<p>1 home, right?</p> <p>2 MR. TEPFER: Objection: asked and answered.</p> <p>3 BY THE WITNESS:</p> <p>4 A. Out of the place that we was renting, yes.</p> <p>5 Q. What was the address of the place that you</p> <p>6 were renting?</p> <p>7 A. 6215 South Rhodes, Apartment 1.</p> <p>8 Q. Who lived with you at 6251 [sic] South Rhodes?</p> <p>9 A. Clarissa and our three sons.</p> <p>10 Q. Who are your three sons?</p> <p>11 A. Ben Baker, Gerard Baker, Deon Baker.</p> <p>12 MR. TEPFER: What period of time are we talking</p> <p>13 about right now?</p> <p>14 MR. BAZAREK: 2017.</p> <p>15 MR. TEPFER: Thank you.</p> <p>16 THE WITNESS: Yes. Because Gerard, first he wasn't</p> <p>17 living there, then he moved in; he moved back in.</p> <p>18 BY MR. BAZAREK:</p> <p>19 Q. Where was Gerard living before?</p> <p>20 A. I'm not sure because I was in jail. Then when</p> <p>21 I got out of jail, he was attending school in DeKalb, I</p> <p>22 believe it was. And then after that, he came back and</p> <p>23 lived with us.</p> <p>24 Q. Tell me, the illegal narcotics that you sold</p>
<p style="text-align: center;">Page 15</p> <p>1 A. No.</p> <p>2 Q. Do -- You as a drug dealer in 2017, you made</p> <p>3 income, right?</p> <p>4 MR. TEPFER: Objection to the characterization of</p> <p>5 the question. It's asked and answered.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Yes.</p> <p>8 Q. When did you decide to become a drug dealer</p> <p>9 again? Was it during 2016 or 2017?</p> <p>10 MR. TEPFER: Objection to the form of the question,</p> <p>11 mischaracterizes the testimony, argumentative.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I don't recall.</p> <p>14 Q. Were you a drug dealer during 2017?</p> <p>15 MR. TEPFER: Objection to the form --</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. Or strike that question.</p> <p>18 Were you a drug dealer in 2016?</p> <p>19 MR. TEPFER: Objection to the form of the question,</p> <p>20 argumentative, mischaracterizes the testimony.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I don't recall. But I know I did sell drugs</p> <p>23 in 2017.</p> <p>24 Q. The drugs you sold out of the -- your family</p>	<p style="text-align: center;">Page 17</p> <p>1 out of your home during 2017, where would you store them</p> <p>2 inside your house?</p> <p>3 MR. TEPFER: Objection to the form, foundation.</p> <p>4 If you're able to answer the question as</p> <p>5 posed, you can answer it.</p> <p>6 BY THE WITNESS:</p> <p>7 A. On the table.</p> <p>8 Q. Where was the table in the apartment?</p> <p>9 A. It's a cocktail table in the front room, in</p> <p>10 the living room.</p> <p>11 Q. So that's where you would keep your illegal</p> <p>12 narcotics?</p> <p>13 A. Yes.</p> <p>14 Q. Would you keep them anywhere else other than</p> <p>15 the cocktail table in the living room?</p> <p>16 A. No.</p> <p>17 Q. Who did you receive the illegal narcotics from</p> <p>18 during 2017?</p> <p>19 A. Jamar Lewis.</p> <p>20 Q. Who is Jamar Lewis?</p> <p>21 A. A friend.</p> <p>22 Q. Is he one of your best friends?</p> <p>23 A. Yes, I would say.</p> <p>24 Q. How long have you known Jamar Lewis?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 18	Page 20
<p>1 A. Roughly since like 1999.</p> <p>2 Q. Now, you're about -- what? -- ten years older</p> <p>3 than Jamar?</p> <p>4 A. Yes.</p> <p>5 Q. Does he ever call you Pops or refer to you as</p> <p>6 Pops?</p> <p>7 A. Yeah. A lot of people do.</p> <p>8 Q. Okay. So tell me, during 2017, when did</p> <p>9 Jamar Lewis first supply you with illegal narcotics that</p> <p>10 you were going to sell out of your house?</p> <p>11 MR. TEPFER: Objection to the form of the question,</p> <p>12 foundation.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I don't recall the specific date. But I</p> <p>15 know -- I guess it was March or May.</p> <p>16 Q. How did that occur?</p> <p>17 MR. TEPFER: Objection: form.</p> <p>18 BY THE WITNESS:</p> <p>19 A. Well, the police or I'm guessing it was the</p> <p>20 law enforcement sent somebody to my door and asked me</p> <p>21 could I get them some drugs.</p> <p>22 Q. And that was Bali?</p> <p>23 A. Yeah. David Baker. Yeah.</p> <p>24 Q. How do you know David Baker?</p>	<p>1 MR. TEPFER: -- if I'm making an objection.</p> <p>2 Go ahead.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. All right. Do you distinguish a user between</p> <p>5 a -- versus a junkie?</p> <p>6 A. No. I look at everybody the same. I would</p> <p>7 look at you the same way I would look at someone that</p> <p>8 uses drugs because my mother used drugs and my sisters</p> <p>9 use drugs. So I treated people how I wanted them to be</p> <p>10 treated.</p> <p>11 Q. Yeah. When was the last time you had any</p> <p>12 interactions or contact with David Baker?</p> <p>13 A. 2010, I believe.</p> <p>14 Q. Do you know where David Baker currently</p> <p>15 resides?</p> <p>16 A. No.</p> <p>17 Q. Do you know any address that -- where he</p> <p>18 previously lived?</p> <p>19 A. No.</p> <p>20 Q. At the apartment around 6251 South Rhodes, was</p> <p>21 there a park around there?</p> <p>22 A. 6215?</p> <p>23 Q. Right. That's where you lived, right?</p> <p>24 A. You just said 51.</p>
<p style="text-align: center;">Page 19</p> <p>1 A. We grew up around the same area.</p> <p>2 Q. Is David Baker a Gangster Disciple?</p> <p>3 A. I don't know.</p> <p>4 Q. Was he?</p> <p>5 A. I don't know. I know he was a gay man -- a</p> <p>6 gay man. I don't know if he was a Gangster Disciple.</p> <p>7 Q. But you -- Did you know him from Ida B. Wells?</p> <p>8 A. Yes.</p> <p>9 Q. Did David Baker have any other nicknames other</p> <p>10 than Bali?</p> <p>11 A. I only knew him by Bali for a nickname.</p> <p>12 Q. During the 2000s, would you sell narcotics to</p> <p>13 David Baker, aka Bali?</p> <p>14 A. From time to time, yes.</p> <p>15 Q. Was he a junkie?</p> <p>16 MR. TEPFER: Objection to the characterization,</p> <p>17 form.</p> <p>18 BY THE WITNESS:</p> <p>19 A. Well, he was a user.</p> <p>20 MR. TEPFER: Let me finish my objections --</p> <p>21 THE WITNESS: Oh, okay.</p> <p>22 MR. TEPFER: -- when I do. Before you answer, give</p> <p>23 me a second --</p> <p>24 THE WITNESS: Okay.</p>	<p style="text-align: center;">Page 21</p> <p>1 Q. I'm sorry. 62- -- It's 6251?</p> <p>2 A. No.</p> <p>3 Q. It's 6215?</p> <p>4 A. Yes.</p> <p>5 Q. Sorry. Okay. All right. The 6200 block</p> <p>6 of --</p> <p>7 A. Rhodes.</p> <p>8 Q. -- South Rhodes, is there a park around there?</p> <p>9 A. Well, I know you got Washington Park down on</p> <p>10 60th.</p> <p>11 Q. Okay. So how was it that David Baker just</p> <p>12 shows up at your house one day?</p> <p>13 MR. TEPFER: Objection: form.</p> <p>14 To the extent you understand the question.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Well, he used to sell, like, detergent and</p> <p>17 stuff like that. And he would come, and I would buy it,</p> <p>18 you know, like cleaning products.</p> <p>19 Q. During what time period?</p> <p>20 A. Like 2017. That's -- He would come and sell</p> <p>21 stuff that he obtained, however he obtained it. So I</p> <p>22 would buy from there.</p> <p>23 Q. So what? Is he, like, the Fuller Brush man?</p> <p>24 He just shows up at apartments with stuff to sell?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 22	Page 24
<p>1 MR. TEPFER: Objection to the characterization, 2 mischaracterizes the testimony, form. 3 BY THE WITNESS: 4 A. I don't -- I don't know. 5 MR. TEPFER: Let me finish, Ben. 6 THE WITNESS: Oh, okay. 7 MR. TEPFER: Go ahead. Go ahead now. 8 BY THE WITNESS: 9 A. I don't know what -- Bali, he Bali. 10 Q. All right. So in the dep, I'll just call 11 him -- Bali, that's what you refer to him as, Bali? 12 A. Yes. 13 Q. Okay. Was Bali your best customer in your 14 sale of illegal narcotics during 2017? 15 MR. TEPFER: Objection to the form of the question. 16 BY THE WITNESS: 17 A. I sold drugs to Bali. 18 Q. Okay. So I -- But I'm trying to understand -- 19 Bali -- what? He just -- On one day, he knocks on your 20 door or rings your doorbell? 21 A. A lot of times he knocked on my door. 22 Q. Okay. Did he tell you he was coming over? 23 A. No, not -- It depend when you talking. 24 Q. 2017.</p>	<p>1 and I moved in with them. 2 Q. Okay. And at the time in 2016 after you were 3 released, were you divorced from Clarissa? 4 A. Yes. 5 Q. When did you get divorced? 6 A. Well, I got the papers in like 2014. 7 Q. When was the divorce finalized? 8 A. I'm not sure. I'm thinking that's when it was 9 because I was incarcerated when she filed. So I guess 10 I'm under the impression when I got the papers, it was 11 final. 12 Q. When did you marry Clarissa? 13 A. 2006, March 24th. 14 Q. Do you have any plans to remarry Clarissa? 15 A. I don't know. 16 Q. Let's go back to Bali. When does it first 17 come up about Bali wanting to buy drugs from you? 18 A. Sometime in 2017, I believe. Bali just came 19 and said -- because she -- Bali call me Popcorn. And I 20 call her -- well, him she, you know, because that's what 21 he identifies as, a female. 22 Q. And he was at your apartment on Rhodes? 23 A. Yes. 24 Q. And tell me about the conversation you had</p>
Page 23	Page 25
<p>1 MR. TEPFER: Objection to foundation. 2017 is 2 365 days. 3 BY MR. BAZAREK: 4 Q. Let's do it this way: What month -- What's 5 the first time you had contact with Bali in 2017? 6 A. I'm not sure because Bali would just show up 7 and Bali would just have stuff to sell. So I can't say 8 when the first time in 2017 that I seen Bali. 9 Q. Okay. 10 A. I've seen Bali in 2016 selling stuff. So I 11 can't say when the first time Bali came, showed up at my 12 door. I don't know. 13 Q. Okay. When did you first move in to 14 6215 South Rhodes? 15 A. I moved into 2- -- well, 6215 in 2016. 16 Q. Do you know the month? 17 A. No. 18 Q. Do you know what season? 19 A. I got out in January, so I would say maybe 20 around April. 21 Q. And you signed a lease? 22 A. No. 23 Q. How did you end up living there? 24 A. Because my girl and my kids was living there,</p>	<p>1 with Bali at that time. 2 A. Bali said, "Popcorn, I need -- my brother 3 trying to get some drugs, trying to get five grams so he 4 can go back out of town." And I said, "Well, I don't 5 got none." And then he said, "Could you get me some?" 6 I say, "Well, I'll make a call or two for you and see." 7 Q. All right. And then tell me about the call 8 that you made after that conversation with Bali. 9 MR. TEPFER: Objection: misstates the evidence. 10 Go ahead. 11 BY THE WITNESS: 12 A. I made some calls. I got on the phone and 13 called and said, "Do you have something?" 14 Q. Who did you call? 15 A. I called Jamar. 16 Q. Did you call anyone else? 17 A. No. 18 Q. How did you know to call Jamar? 19 A. Because that was my friend. That was ... 20 Q. Well, you called him because you knew you 21 could get illegal narcotics from Jamar Lewis, right? 22 A. I called him because -- Yes. 23 Q. And he was also a drug dealer, right? 24 MR. TEPFER: Objection to form.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 26	Page 28
<p>1 Go ahead.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I guess if that's what you label him, yes.</p> <p>4 Q. Where is Jamar right now? Do you know?</p> <p>5 A. He incarcerated.</p> <p>6 Q. Do you ever talk to him?</p> <p>7 A. I can't talk to him.</p> <p>8 Q. Do you ever visit him?</p> <p>9 A. If I can't talk to him, I can't visit him.</p> <p>10 Q. Is that the rule? I don't know in the federal system if that's -- Is that the rule?</p> <p>11 A. No, I don't visit him.</p> <p>12 Q. Okay.</p> <p>13 MR. TEPFER: Okay.</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. Is he -- He's -- What's he incarcerated for? Do you know?</p> <p>16 A. Narcotics.</p> <p>17 Q. Selling narcotics?</p> <p>18 A. (Nodding head.)</p> <p>19 Q. Yes?</p> <p>20 A. Yes.</p> <p>21 Q. Did he -- Did Jamar Lewis have a girlfriend?</p> <p>22 MR. TEPFER: Objection: foundation, what time</p>	<p>1 BY THE WITNESS:</p> <p>2 A. Ain't no telling. That's who I hung with, so</p> <p>3 I was always around him. He would come and pick me up.</p> <p>4 You know, I always had interactions with him.</p> <p>5 Q. Okay. Fair to say Jamar Lewis is your best friend?</p> <p>6 MR. TEPFER: Objection: asked and answered.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Jamar Lewis is my friend.</p> <p>9 Q. Is he one of your closest friends?</p> <p>10 MR. TEPFER: Objection: asked and answered.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Yes.</p> <p>13 Q. Is he a confidante?</p> <p>14 A. Jamar Lewis is my friend.</p> <p>15 Q. And you've engaged in illegal narcotics activity with Jamar Lewis, right?</p> <p>16 MR. TEPFER: Objection to the form, argumentative.</p> <p>17 I think it's asked and answered.</p> <p>18 Go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I have.</p> <p>21 Q. When was the first time you engaged in illegal narcotics activity with Jamar Lewis?</p>
<p style="text-align: center;">Page 27</p> <p>1 period we're talking about.</p> <p>2 BY MR. BAZAREK:</p> <p>3 Q. I'm still -- 2017. Everything I'm asking about now, Mr. Baker, is about 2017.</p> <p>4 A. Yes.</p> <p>5 Q. It was Ms. Mayfield, right?</p> <p>6 A. Who is that?</p> <p>7 Q. Okay. Who was Jamar -- Do you know who -- Do you know a woman named Mayfield who dated Jamar Lewis?</p> <p>8 A. I might know the first name.</p> <p>9 Q. Drove a Mercedes?</p> <p>10 A. Toya. Toya?</p> <p>11 Q. Toya? What's Toya's last name?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. All right. Let's go back to the conversation with Jamar Lewis. And as best you can recall, was the conversation in March of 2017 or would have been before?</p> <p>14 A. I'm not sure.</p> <p>15 Q. Prior to Bali asking you to, you know, get him some drugs, when had been the last time that you had any interactions with Jamar Lewis?</p> <p>16 MR. TEPFER: Objection to the form of the question.</p> <p>17 Go ahead.</p>	<p style="text-align: center;">Page 29</p> <p>1 MR. TEPFER: Objection to the form.</p> <p>2 If you understand what he means, go ahead.</p> <p>3 BY THE WITNESS:</p> <p>4 A. Yes. I don't -- I understand. But I don't recall, like, the first time we sold drugs together.</p> <p>5 Q. Did you sell drugs together with Jamar Lewis during the 2000s?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 A. Like I say, I don't recall the first time, the first day.</p> <p>9 Q. And what are Jamar Lewis's nicknames?</p> <p>10 A. Tweet.</p> <p>11 Q. Does he ever go by any other nicknames that you know?</p> <p>12 A. I call him Tweet.</p> <p>13 Q. Was Jamar -- Was or is Jamar Lewis a Gangster Disciple, if you know?</p> <p>14 A. He never told me he was a Gangster Disciple.</p> <p>15 Q. And I know you were a Gangster Disciple and you were beginning around the age of 18, correct?</p> <p>16 A. Yes.</p> <p>17 Q. And then you stopped being a Gangster Disciple, at least according to your interrogatory</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 30	Page 32
<p>1 answers, sometime around 2012?</p> <p>2 A. Yes.</p> <p>3 Q. Yeah. Why did you leave membership in the</p> <p>4 Gangster Disciples?</p> <p>5 A. I got older and it no longer made sense to me.</p> <p>6 Q. Okay. All right. So let's -- I want to go</p> <p>7 back to this call you have with Mr. Lewis about getting</p> <p>8 Bali some drugs. Tell me everything that was said</p> <p>9 between you and Jamar Lewis on the phone.</p> <p>10 A. I don't recall everything that was said.</p> <p>11 Q. Tell me what you remember at this deposition</p> <p>12 that was said in that phone call.</p> <p>13 A. I said, "Bali trying to get five grams." To</p> <p>14 the best of my knowledge, he said, "Okay." And that was</p> <p>15 that.</p> <p>16 Q. Okay. So then somehow you got the drugs from</p> <p>17 Jamar, right?</p> <p>18 A. Yes.</p> <p>19 Q. Tell me how you received the drugs from Jamar.</p> <p>20 A. He brought it to me.</p> <p>21 Q. Jamar came to your apartment?</p> <p>22 A. Yes.</p> <p>23 Q. And what did he bring to your apartment?</p> <p>24 A. The drugs that Bali wanted.</p>	<p>1 A. No.</p> <p>2 Q. How about the boys?</p> <p>3 A. They were working.</p> <p>4 Q. How long did Jamar stay at your apartment?</p> <p>5 A. I'm not sure.</p> <p>6 Q. Did -- All right. So you don't know how long</p> <p>7 Jamar stays at the apartment. At some point, he leaves?</p> <p>8 A. Yes.</p> <p>9 Q. And then what's your next interaction with</p> <p>10 Bali?</p> <p>11 A. I called Bali and was like, "Well, you could</p> <p>12 come back." And he said, "Okay."</p> <p>13 Q. So you gave -- So Bali came back to your</p> <p>14 apartment the same day that you got the narcotics from</p> <p>15 Jamar?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And then tell me about your</p> <p>18 interactions with Bali once he came to your apartment.</p> <p>19 A. He came back to get the drugs. I would let --</p> <p>20 I let him in because we had two doors. We had the front</p> <p>21 door, and then we had the -- We had the door leading to</p> <p>22 outside, and then we had the door to our apartment. So</p> <p>23 I would stand in the middle of those two doors. And I</p> <p>24 said, "It's 360." So he peeled off some money and gave</p>
Page 31	Page 33
<p>1 Q. And then did you pay Jamar for the narcotics</p> <p>2 that he brought to your apartment?</p> <p>3 A. Once Bali came back with the money, yes.</p> <p>4 Q. What was Jamar's take in the deal?</p> <p>5 MR. TEPFER: Objection to the form.</p> <p>6 BY MR. BAZAREK:</p> <p>7 Q. The drug deal is what I'm talking about.</p> <p>8 A. I know what you're talking about. You say the</p> <p>9 take. It was what it cost. I think it was \$360.</p> <p>10 Q. And then what did you get out of that?</p> <p>11 MR. TEPFER: Objection to the form.</p> <p>12 BY THE WITNESS:</p> <p>13 A. Nothing.</p> <p>14 Q. Did Jamar Lewis stay with you when you</p> <p>15 delivered the narcotics to Bali?</p> <p>16 A. No.</p> <p>17 Q. Okay. When Jamar Lewis came to your apartment</p> <p>18 with the narcotics, did you put it -- did you put the</p> <p>19 narcotics on the cocktail table?</p> <p>20 A. Yes.</p> <p>21 Q. Do you remember what time of day it was?</p> <p>22 A. No. But I know it was light outside, so the</p> <p>23 sun was still up.</p> <p>24 Q. Was Clarissa home?</p>	<p>1 me 360. Then I gave him the drugs.</p> <p>2 Q. And what were the drugs that you gave him?</p> <p>3 A. Five grams of heron, I believe.</p> <p>4 Q. Okay. So when is your next interaction with</p> <p>5 Bali after that?</p> <p>6 A. He would come back from time to time wanting</p> <p>7 five grams. I mean, I can't give you the actual days.</p> <p>8 But he would come back for the same thing.</p> <p>9 Q. And it was the same routine; he'd bring you</p> <p>10 money for the illegal narcotics, and then you would give</p> <p>11 him the illegal narcotics?</p> <p>12 MR. TEPFER: Objection to mischaracterizes the</p> <p>13 prior testimony, form of the question.</p> <p>14 BY THE WITNESS:</p> <p>15 A. He would say that he wanted some drugs. And</p> <p>16 then when I got them, he would come back with his money,</p> <p>17 and I would give him the drugs.</p> <p>18 Q. Right. And he would pay you the money, right?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And then was it always heroin that you</p> <p>21 gave him?</p> <p>22 A. Yes.</p> <p>23 Q. Did you ever give him fentanyl?</p> <p>24 A. Not knowingly, no.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 34	Page 36
<p>1 Q. Okay. And then all the drugs that you sold to 2 Bali, did you receive them from Jamar? 3 A. Yes. In 2017, yes. 4 Q. Yeah. I'm just -- All I'm talking about is 5 2017. 6 A. Okay. 7 MR. TEPFER: I'm going to object to the 8 characterization of Mr. Baker selling the drugs to Bali. 9 But go ahead. 10 BY MR. BAZAREK: 11 Q. You sold drugs to Bali, right? 12 A. I passed drugs to Bali, yes. 13 Q. Okay. You made admissions to Judge Norgle 14 when you pled guilty to numerous federal narcotics 15 offenses, right? 16 MR. TEPFER: Objection to the characterization of 17 numerous narcotic offenses. Mr. Baker pled guilty to 18 one count. 19 BY THE WITNESS: 20 A. Oh, I thought he answered that. 21 I sold drugs to Bali. Yes. I pled guilty in 22 front of Judge Norgle. 23 Q. During the times when Bali came to the 24 apartment that you shared with your family, were any of</p>	<p>1 they'd get up early, right? They would go to work? 2 A. Yes. 3 Q. They worked somewhere downtown, a sandwich 4 place, if I recall; is that correct? 5 A. Yes. 6 Q. When -- This, I didn't ask you. So you talked 7 about the narcotics transactions that you would do with 8 Bali. Now I want to know about your supplier, 9 Jamar Lewis. Would Jamar always come to your apartment 10 to deliver the narcotics that you were going to sell to 11 Bali? 12 MR. TEPFER: Objection to foundation, 13 characterization of the question, supplier. 14 If you understand the question, you can answer 15 it. 16 BY THE WITNESS: 17 A. Yes. 18 Q. Did you ever go meet Jamar out on the street 19 or any other -- Strike that. 20 Did you ever meet Jamar outside of your 21 apartment on Rhodes to receive illegal narcotics from 22 him? 23 A. No, not that I recall. No. 24 Q. Okay. And I know your attorney just made an</p>
<p style="text-align: center;">Page 35</p> <p>1 your family members home? 2 A. Could you ask the question again? 3 Q. Sure. When Bali would come to your apartment 4 to get the narcotics that you were selling to him, were 5 there other family members present at your apartment? 6 A. Oh, I don't -- 7 MR. TEPFER: Objection to the form of the question. 8 But go ahead. 9 BY THE WITNESS: 10 A. I don't recall if somebody was there. Maybe 11 somebody was, maybe not. You know, maybe. I don't 12 know. 13 Q. Was Clarissa working during 2017? 14 A. Yes. Clarissa had started working, I believe, 15 at the dental office. 16 Q. She started sometime in 2017? 17 A. I believe. I'm not sure. 18 Q. Yeah. 19 A. But I believe she did. 20 Q. Do you know what month Clarissa started -- 21 A. No. 22 Q. -- at the dental office? 23 A. No. 24 Q. And I remember your -- two of your sons,</p>	<p style="text-align: center;">Page 37</p> <p>1 objection to referring to Jamar Lewis as a supplier. 2 But Jamar Lewis was supplying narcotics to you -- 3 right? -- in 2017? 4 A. Well, I would get the drugs from him to give 5 to Bali, yes. 6 Q. He was your supplier, right? 7 A. No. I didn't have a supplier. But I would be 8 the go-between to get the drugs from him and give to 9 Bali. 10 Q. Yeah. What is your understanding of what a 11 supplier is when it comes to narcotics trafficking? 12 A. My understanding of it is that I would have to 13 be making money off of the drugs that I was getting. I 14 wasn't making money off of the drugs that I was getting. 15 I was just really more so, like, doing a favor, I guess. 16 But he wasn't just supplying me with drugs. I was doing 17 a favor, I thought, for a friend. 18 Q. Which friend are we talking about now? Are we 19 talking about -- 20 A. Both. Well, I considered Bali and Jamar 21 friends. 22 Q. So why didn't you just tell Bali, "Hey, go 23 directly to Jamar Lewis and get the drugs. I don't need 24 to be involved"?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 38	Page 40
<p>1 MR. TEPFER: Objection: argumentative. 2 But go ahead. 3 BY THE WITNESS: 4 A. Because I don't believe that Jamar really got 5 along with Bali. 6 Q. And why is that? 7 A. I don't know. I was gone for ten years. I 8 don't know what transpired. 9 Q. During 2017, did you receive illegal narcotics 10 from anyone other than Jamar Lewis? 11 A. Well, at that time, marijuana was illegal, so 12 I guess, yes. 13 Q. Okay. Who did you get the marijuana from? 14 A. I would go to a -- You go to any corner on 15 Chicago and get a bag of marijuana. 16 Q. Where would you get yours from? 17 A. The South Side. 18 Q. Yeah. I know in your interrogatory answers, 19 you talked about, yeah, you got some weed or smoked some 20 cannabis during like 2017. Is that right? 21 A. Yeah. 2016, 2017. Yes. 22 Q. But -- And I'm distinguishing between -- 23 Strike that. 24 I want to make sure I understand your answer.</p>	<p>1 Q. What was the address on Vernon that you lived 2 in in 2018? 3 A. The one I live at now. 4 Q. What's the address? 5 A. 6540 South Vernon. 6 MR. TEPFER: Just to be clear, I have to -- and we 7 talked about this -- take a scheduled call related to 8 these matters in about four minutes. 9 MR. BAZAREK: Yeah. After a couple questions, 10 we'll take a break. 11 BY MR. BAZAREK: 12 Q. Has Jamar Lewis ever been inside 13 6540 South Vernon? 14 A. Yes. 15 Q. And when would he have been there? 16 A. He would come by and visit from time to time. 17 Q. To your knowledge, did Jamar Lewis dilute the 18 heroin that he would supply? 19 MR. TEPFER: Objection to foundation, form. 20 But if you understand what he's talking about 21 and the question, you can answer. 22 BY THE WITNESS: 23 A. I mean, I don't know. 24 Q. Do you know what that means to dilute heroin?</p>
<p style="text-align: center;">Page 39</p> <p>1 Separate and apart from cannabis that you would get for 2 your own personal use, I'm talking now about heroin, 3 cocaine, illegal controlled substances. 4 A. Okay. 5 Q. So let me ask the question again. During -- 6 Other than -- Strike that. 7 During 2017, did you receive heroin from 8 anyone other than Jamar Lewis? 9 A. I don't believe so, no. 10 Q. What was the distance from where you lived at 11 6215 South Rhodes and where Jamar Lewis resided? 12 A. I mean, I don't know. It's -- I don't know 13 what the distance was because I don't know. 14 Q. Where did Jamar Lewis reside during 2017? 15 A. I think on Wells. 16 Q. Did he live on Vernon? 17 A. On Vernon? 18 Q. Yeah. 19 A. I lived -- No. I lived on Vernon after I left 20 Wells -- I mean, after I left Rhodes. 21 Q. Did Jamar Lewis ever go to the Vernon address 22 during 2017 that you know of? 23 A. He couldn't have because I wasn't living on 24 Vernon at that time. I moved to Vernon in 2018.</p>	<p style="text-align: center;">Page 41</p> <p>1 A. Yeah. I guess you -- You mean cut it? 2 Q. Cut it. 3 A. Stretch it or whatever. I don't know. 4 Q. Well, sir, you were dealing heroin back in the 5 2000s, right? 6 A. Yes. 7 Q. And you sold heroin that would have been cut; 8 is that right? 9 A. I don't know. I wasn't a user, so I don't 10 know. 11 Q. Well, to your knowledge, do drug dealers, 12 like, cut the heroin before they sell it? 13 MR. TEPFER: Objection to the form and -- of drug 14 dealers. I don't understand the question. 15 But if you do, go ahead. 16 BY THE WITNESS: 17 A. I don't know who cuts drugs and who don't. I 18 don't know. 19 Q. All right. Have you ever cut any drugs that 20 you had ever? 21 A. No. 22 Q. Okay. Did Jamar Lewis ever bring illegal 23 narcotics to 6540 South Vernon? 24 A. Yes.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 42	Page 44
<p>1 Q. Tell me about that.</p> <p>2 A. At that time, I was still talking to Bali, and</p> <p>3 Bali was still asking for drugs. So I would get them</p> <p>4 from Jamar and give it to Bali.</p> <p>5 Q. So Jamar would bring the drugs to</p> <p>6 6540 South Vernon?</p> <p>7 A. He has.</p> <p>8 Q. Okay. And that would have been in the same</p> <p>9 time period, 2017, 2018?</p> <p>10 A. 2018.</p> <p>11 MR. BAZAREK: All right. Let's take a break.</p> <p>12 MR. TEPFER: Okay. Ben, come with me.</p> <p>13 THE VIDEOGRAPHER: The time is 10:56 a.m. We are</p> <p>14 now off the record.</p> <p>15 (A short break was had.)</p> <p>16 THE VIDEOGRAPHER: The time is 11:22 a.m. We are</p> <p>17 now back on the record.</p> <p>18 BY MR. BAZAREK:</p> <p>19 Q. Mr. Baker, just so I'm clear, what time frame</p> <p>20 beginning in 2018 have you lived at the South Vernon</p> <p>21 address?</p> <p>22 A. I'm not quite sure what day we moved in there.</p> <p>23 I believe it was August.</p> <p>24 Q. Of 2018?</p>	<p>1 MR. BAZAREK: Objection to the form of the</p> <p>2 question.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I believe I came to the car. I was in a</p> <p>5 truck, a red pickup truck.</p> <p>6 Q. So you stored the illegal narcotics in your</p> <p>7 red pickup truck?</p> <p>8 MR. TEPFER: Objection to the form.</p> <p>9 BY THE WITNESS:</p> <p>10 A. No.</p> <p>11 Q. Okay. Please explain the narcotics</p> <p>12 transaction that you did with Bali on South Vernon.</p> <p>13 A. I believe Bali called and said he was on the</p> <p>14 way. And I was going somewhere. I don't recall where.</p> <p>15 So I said, "I'll meet you outside." And Bali came, and</p> <p>16 I gave it to him.</p> <p>17 Q. Okay. So you took the narcotics out of your</p> <p>18 apartment on Vernon and brought the narcotics outside to</p> <p>19 wait for Bali?</p> <p>20 A. I met Bali outside.</p> <p>21 Q. Is that what you did?</p> <p>22 A. I met Bali outside.</p> <p>23 Q. Right. But where did you get the narcotics</p> <p>24 from that you had with you? Where did you get the</p>
<p style="text-align: center;">Page 43</p> <p>1 A. I believe. No, it couldn't have been because</p> <p>2 we got April of -- So, yeah, it might have been 2017</p> <p>3 August.</p> <p>4 Q. So you moved from Rhodes to South Vernon?</p> <p>5 A. Yes.</p> <p>6 Q. Was Toya ever inside your apartment on</p> <p>7 South Vernon?</p> <p>8 A. Yes.</p> <p>9 Q. Were there times where you would not be</p> <p>10 present at the apartment on Vernon but Jamar and Toya</p> <p>11 would be there?</p> <p>12 MR. TEPFER: Objection to the form and how he could</p> <p>13 possibly know to answer that question, calls for</p> <p>14 speculation.</p> <p>15 But if you can answer it, go ahead.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I mean, I don't know.</p> <p>18 Q. Did Bali also visit you at the Vernon</p> <p>19 apartment --</p> <p>20 A. Yes.</p> <p>21 Q. -- to buy drugs?</p> <p>22 A. Yes.</p> <p>23 Q. And then you sold Bali drugs from the Vernon</p> <p>24 apartment, right?</p>	<p style="text-align: center;">Page 45</p> <p>1 narcotics from?</p> <p>2 MR. TEPFER: Objection to form.</p> <p>3 If you understand.</p> <p>4 BY THE WITNESS:</p> <p>5 A. Yes, I understand. I brought it out the house</p> <p>6 and waited on Bali.</p> <p>7 Q. Okay. And where -- On South Vernon, where</p> <p>8 would you keep the illegal narcotics that you would get</p> <p>9 from Jamar Lewis?</p> <p>10 A. Well, I had it in my pocket that day.</p> <p>11 Q. When did Jamar Lewis supply you with that</p> <p>12 heroin?</p> <p>13 A. Most likely that day.</p> <p>14 Q. How much time -- Did Jamar Lewis go into your</p> <p>15 apartment that day on Vernon?</p> <p>16 A. Most likely.</p> <p>17 Q. Was anyone home other than yourself at the</p> <p>18 apartment?</p> <p>19 A. Not that I know of. Not that I recall.</p> <p>20 Q. How many times did Bali come to your apartment</p> <p>21 on South Vernon to purchase narcotics?</p> <p>22 A. I'm not sure. I believe -- I'm not sure.</p> <p>23 Q. Was it more than once?</p> <p>24 A. I'm not sure.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 46	Page 48
<p>1 Q. Well, as you sit here today at this 2 deposition, you've just described a narcotics sale that 3 you had with Bali, correct?</p> <p>4 MR. TEPFER: Objection to the form of the question, 5 mischaracterizes the testimony.</p> <p>6 BY THE WITNESS: 7 A. Yes. Outside.</p> <p>8 Q. Did you ever have a narcotics transaction with 9 Bali inside your apartment on Vernon?</p> <p>10 A. Not that I recall, no.</p> <p>11 Q. Did any member of your household ever sell 12 narcotics to Bali?</p> <p>13 MR. TEPFER: Objection: calls for speculation, 14 form.</p> <p>15 If you know the answer, you can --</p> <p>16 BY THE WITNESS: 17 A. Not that I know of, no.</p> <p>18 Q. Has your son Gerard ever been arrested for a 19 narcotics offense?</p> <p>20 A. Yes, he was.</p> <p>21 Q. And when was that?</p> <p>22 A. He was arrested April 7th of 2018.</p> <p>23 Q. Is that the same day you were arrested?</p> <p>24 A. I wasn't arrested. I turned myself in.</p>	<p>1 Q. Did you pay for his attorney?</p> <p>2 A. No.</p> <p>3 Q. Did your -- Did Clarissa pay for his attorney?</p> <p>4 A. I don't know.</p> <p>5 Q. Would Jamar provide illegal narcotics to your 6 son Gerard?</p> <p>7 A. Not to my knowledge.</p> <p>8 Q. Who was Gerard's supplier?</p> <p>9 A. I don't know.</p> <p>10 Q. Did Gerard ever store narcotics at the Rhodes 11 address --</p> <p>12 MR. TEPFER: Objection.</p> <p>13 BY MR. BAZAREK: 14 Q. -- where you lived with your family or at the 15 South Vernon address where you lived with your family?</p> <p>16 MR. TEPFER: Objection to the form of all these 17 questions. He's already answered he knew nothing about 18 it.</p> <p>19 But if you -- Go ahead.</p> <p>20 BY THE WITNESS: 21 A. I don't know.</p> <p>22 Q. Did you ever -- Did you ever talk to Gerard at 23 any time about the circumstances that led to his arrest?</p> <p>24 A. No.</p>
<p style="text-align: center;">Page 47</p> <p>1 Q. Okay. Did you turn yourself in the same day 2 your son Gerard was arrested?</p> <p>3 A. Yes.</p> <p>4 Q. Did Gerard ever live at the South Vernon 5 address?</p> <p>6 A. Yes.</p> <p>7 Q. What was Gerard's role in narcotics activity 8 during 2018?</p> <p>9 MR. TEPFER: Objection: calls for speculation, 10 form.</p> <p>11 BY THE WITNESS: 12 A. None that I knew of. I was surprised when 13 they arrested him. I didn't know.</p> <p>14 Q. Do you know what happened with Gerard's 15 criminal case?</p> <p>16 A. I think he received probation. I'm not sure, 17 though.</p> <p>18 Q. And did he -- He pled guilty to a narcotics 19 offense?</p> <p>20 A. I believe so.</p> <p>21 Q. Did you ever talk to him about it?</p> <p>22 A. No.</p> <p>23 Q. Who represented him at -- when he pled guilty?</p> <p>24 A. I'm not sure.</p>	<p style="text-align: center;">Page 49</p> <p>1 Q. Why not?</p> <p>2 A. Because I was upset that he had a case. Plus, 3 he a grown man.</p> <p>4 Q. You expected more from him?</p> <p>5 A. He was a grown man.</p> <p>6 Q. But you've engaged in narcotics activity as a 7 grown man. What's the difference?</p> <p>8 MR. TEPFER: Objection: argumentative, form.</p> <p>9 BY THE WITNESS: 10 A. You always want your kids to be better than 11 you.</p> <p>12 Q. So you were disappointed?</p> <p>13 A. He's a grown man.</p> <p>14 Q. Did you attend any of his criminal court 15 proceedings?</p> <p>16 A. For that case?</p> <p>17 Q. Yes.</p> <p>18 A. No.</p> <p>19 Q. Why not?</p> <p>20 A. Because I was attending my own.</p> <p>21 Q. So you would go to the federal courthouse, and 22 then your son Gerard would go to the 26th and Cal?</p> <p>23 A. I believe so.</p> <p>24 Q. Was your son Gerard involved in narcotics</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p>1 activity with Jamar Lewis?</p> <p>2 MR. TEPFER: Objection to the form. Continuing</p> <p>3 objection to these questions. He's already answered</p> <p>4 them.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Not that I know of.</p> <p>7 Q. Were there occasions where Jamar Lewis would</p> <p>8 use your apartment on South Vernon to engage in illegal</p> <p>9 narcotics activity?</p> <p>10 A. I mean, when I would call for Bali, that I</p> <p>11 know of.</p> <p>12 Q. Anything else?</p> <p>13 A. I'm not sure.</p> <p>14 Q. Did Jamar Lewis have keys to your Vernon</p> <p>15 apartment?</p> <p>16 A. No.</p> <p>17 Q. So the only way he could get into that</p> <p>18 apartment is if you let him in?</p> <p>19 A. Or if someone was there.</p> <p>20 Q. Other than Bali, during 2017, did you sell</p> <p>21 narcotics?</p> <p>22 MR. TEPFER: Objection to the --</p> <p>23 BY MR. BAZAREK:</p> <p>24 Q. Or strike that.</p>	<p>1 A. I mean, I don't know. She had friends. I</p> <p>2 don't know.</p> <p>3 Q. What was Zachary Brown's mother's name?</p> <p>4 A. Michelle.</p> <p>5 Q. How old is Zachary Brown?</p> <p>6 A. I think we around the same age. He should</p> <p>7 be 50, 51.</p> <p>8 Q. Do you know where he lives right now?</p> <p>9 A. No.</p> <p>10 Q. Tell me how it was that you engaged in</p> <p>11 narcotics transactions with Zachary Brown.</p> <p>12 MR. TEPFER: Objection to foundation, when you're</p> <p>13 talking about.</p> <p>14 If you understand, you can answer.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I mean, one day he just approached me and</p> <p>17 asked me could I find drugs for him.</p> <p>18 Q. And where were you at when he approached you?</p> <p>19 A. I'm not sure. It was somewhere on the low</p> <p>20 end, I believe, but I'm not sure the exact place.</p> <p>21 Q. You were out of doors somewhere?</p> <p>22 A. Yes.</p> <p>23 Q. Were you with anyone?</p> <p>24 A. No.</p>
<p>1 Page 51</p> <p>2 Other than Bali, did you sell anyone else</p> <p>3 narcotics during 2017?</p> <p>4 MR. TEPFER: Objection to the form of the question,</p> <p>5 mischaracterizes the prior testimony.</p> <p>6 Go ahead.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Yes.</p> <p>9 Q. Who?</p> <p>10 A. Zachary Brown.</p> <p>11 Q. Who is Zachary Brown?</p> <p>12 A. He's a person I knew growing up.</p> <p>13 Q. From Ida B. Wells?</p> <p>14 A. No.</p> <p>15 Q. Where -- How long have you known</p> <p>16 Zachary Brown?</p> <p>17 A. For as long as I can remember.</p> <p>18 Q. Grammar school?</p> <p>19 A. Before that.</p> <p>20 Q. Like 4 or 5 years old?</p> <p>21 A. As long as I can remember, yes. His mother</p> <p>22 and my mother were friends --</p> <p>23 Q. Were they best friends?</p> <p>24 A. -- before we was born.</p> <p>25 Q. Okay. Were they best friends?</p>	<p>1 Page 53</p> <p>2 Q. Do you know the street? area?</p> <p>3 A. No.</p> <p>4 Q. Was it near your home?</p> <p>5 A. No.</p> <p>6 Q. Okay. Was it downtown?</p> <p>7 A. I'm not sure where it was at that he actually</p> <p>8 approached me. But I would -- I'm not sure.</p> <p>9 Q. Prior to that day when he approached you about</p> <p>10 getting narcotics, when had been the last time he had</p> <p>11 seen you?</p> <p>12 A. We would see each other from time to time</p> <p>13 different places, like maybe the gym, different places.</p> <p>14 Q. And just so -- I want to make sure I got the</p> <p>15 time frame right. This is during 2017?</p> <p>16 A. I believe, yes.</p> <p>17 Q. Okay. Did you ever sell narcotics to</p> <p>18 Zachary Brown during 2018?</p> <p>19 A. I'm not sure. Maybe; maybe not. I'm not</p> <p>20 sure.</p> <p>21 Q. Okay. So tell me about this conversation that</p> <p>22 you had with Zachary Brown in 2017.</p> <p>23 A. I just did. He asked me can I get him some,</p> <p>24 and I said I can see.</p> <p>25 Q. And what did he ask for?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 54	Page 56
<p>1 A. Heroin.</p> <p>2 Q. Zachary Brown is a user?</p> <p>3 A. I don't know.</p> <p>4 Q. Was he -- Would you consider him -- Or strike 5 that.</p> <p>6 You know what a -- Here. You know what a drug 7 addict is, right?</p> <p>8 A. Yes.</p> <p>9 Q. A junkie, right?</p> <p>10 A. If that's what you call them.</p> <p>11 Q. Hype?</p> <p>12 A. If that's what you say.</p> <p>13 Q. What do you call him?</p> <p>14 A. A person that use drugs.</p> <p>15 Q. All right. So he asked you to get him some 16 heroin, right?</p> <p>17 A. Yes. He asked me if I could get him some</p> <p>18 heroin.</p> <p>19 Q. And then what did you do?</p> <p>20 A. I said I can see.</p> <p>21 Q. And then what happened?</p> <p>22 A. I got the heroin and gave it to him.</p> <p>23 Q. Did you get the heroin that day?</p> <p>24 A. No.</p>	<p>1 that he wanted heroin, did you call Jamar Lewis the same 2 day, or did you meet Jamar Lewis in person? How did 3 that work?</p> <p>4 A. I probably seen him later on that day.</p> <p>5 Q. What address did Jamar Lewis live at during 6 2017?</p> <p>7 A. I'm not sure. I mean, he would move around,</p> <p>8 be different places. I don't know where he actually had</p> <p>9 his name on the address.</p> <p>10 Q. Do you know what block he lived -- Strike 11 that.</p> <p>12 Do you know any block in Chicago where 13 Jamar Lewis resided during 2017 or 2018?</p> <p>14 A. I don't know if he lived there, but I know</p> <p>15 that I went on Wells. I think it was 800 Wells,</p> <p>16 something like that.</p> <p>17 Q. North Wells or South?</p> <p>18 A. I'm not sure. But I know it's not far from</p> <p>19 here, I guess.</p> <p>20 Q. So you don't know if it was north of Madison 21 or south of Madison?</p> <p>22 A. I just know it's a little brown building. I</p> <p>23 never driven there. I was a passenger in the car.</p> <p>24 Q. Would you ever go to Jamar Lewis's Wells</p>
<p style="text-align: center;">Page 55</p> <p>1 Q. Who did you get the heroin from?</p> <p>2 A. Jamar Lewis.</p> <p>3 Q. Does Jamar Lewis know Zachary Brown?</p> <p>4 A. I don't know. I mean, I've never seen them</p> <p>5 together or seen them talk.</p> <p>6 Q. How much heroin did you get from Jamar Lewis 7 to give to Zachary Brown?</p> <p>8 A. I don't know. I know that he was only asking</p> <p>9 for five grams.</p> <p>10 Q. How are they packaged, five grams of heroin?</p> <p>11 MR. TEPFER: Objection to the form.</p> <p>12 BY THE WITNESS:</p> <p>13 A. In plastic.</p> <p>14 Q. But individual bags, or is it one bag, five 15 grams?</p> <p>16 A. Yes.</p> <p>17 Q. Yes what?</p> <p>18 A. One bag.</p> <p>19 Q. And what was the price for the five grams that 20 you were going to give Zachary Brown?</p> <p>21 A. \$360.</p> <p>22 Q. How long did it take you to get -- Strike 23 that.</p> <p>24 When Zachary Brown approached you, told you</p>	<p style="text-align: center;">Page 57</p> <p>1 address to receive narcotics during 2017 or 2018?</p> <p>2 A. No.</p> <p>3 Q. Jamar Lewis would always bring the narcotics 4 to you? Is that your testimony?</p> <p>5 A. Yes.</p> <p>6 Q. Did Zachary Brown -- he paid you the \$360 for 7 the five grams of heroin?</p> <p>8 A. Yes.</p> <p>9 Q. Other than that narcotics sale, were there any 10 other narcotic sales you were involved with with 11 Zachary Brown?</p> <p>12 A. Yes. I believe a few times I got drugs for</p> <p>13 Zach.</p> <p>14 Q. And where did you -- Strike that.</p> <p>15 Tell me about these additional narcotics 16 transactions that you engaged in with Zachary Brown, how 17 it went.</p> <p>18 A. He would call --</p> <p>19 MR. TEPFER: Objection to the form of the question.</p> <p>20 Go ahead.</p> <p>21 BY THE WITNESS:</p> <p>22 A. He would call and ask me could I get him</p> <p>23 again.</p> <p>24 Q. Get what?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 58	Page 60
<p>1 A. Heroin.</p> <p>2 Q. And is this when you're living on Vernon or Rhodes or both?</p> <p>3 A. I'm not quite sure about on Vernon with Zach. I'm not sure. I think maybe one time with Zach on Vernon, but I'm not sure. But I know on Rhodes a couple times. Yeah.</p> <p>8 Q. And would Mr. Brown come into your house to get the narcotics from you?</p> <p>9 A. No.</p> <p>11 Q. How did you give the narcotics to Mr. Brown during the narcotics transactions that you conducted with him?</p> <p>14 A. I would meet him different places.</p> <p>15 Q. So not -- Outside of your apartment; is that correct?</p> <p>17 A. Yes.</p> <p>18 Q. During 2017 or 2018, did you ever provide illegal narcotics to someone who was inside your apartment on Vernon or Rhodes?</p> <p>21 A. Well, with Bali, it was always between the door. So we're not actually inside the house, but inside the -- I guess the doorway between doors.</p> <p>24 Q. When is the last time you saw Zachary Brown?</p>	<p>1 Q. Bali was an informant for the federal government, right?</p> <p>3 A. Yes.</p> <p>4 Q. And when he would buy the narcotics from you, on at least some occasions, he would have audio and video recording the transactions, right?</p> <p>7 MR. TEPFER: Objection to the form of the testimony, mischaracterizes the prior testimony.</p> <p>9 If you know the answer, you can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I guess.</p> <p>12 Q. Well, tell me this: During your -- the -- your federal prosecution, did you ever review audio recordings or video recordings of you engaging in narcotics transactions?</p> <p>16 A. No. I had the -- But I never listened to it. But I never had the video. I lost interest after they say the first one, something was wrong with it. So ...</p> <p>19 Q. So you -- But you had access to audio recordings of the transactions?</p> <p>21 A. Yes.</p> <p>22 Q. And did you ever listen to any of them?</p> <p>23 A. No.</p> <p>24 Q. Was your phone bugged?</p>
<p style="text-align: center;">Page 59</p> <p>1 A. I just seen Zach at the King reunion. King High School had a reunion maybe like two weeks ago or so.</p> <p>4 Q. What did you talk about?</p> <p>5 A. Nothing.</p> <p>6 Q. Did he ask you if you could get him some heroin?</p> <p>8 A. No. He asked me did I want to buy a T-shirt.</p> <p>9 Q. Okay. When is the last time you saw Bali?</p> <p>10 A. I don't know. I don't know when the last time I saw Bali.</p> <p>12 Q. Did you see Bali at any time after you were arrested by federal authorities?</p> <p>14 A. I think I seen Bali on like 63rd standing there. But as far as communication, no, I haven't seen Bali like that.</p> <p>17 Q. When you saw Bali on 63rd, did you speak to Bali?</p> <p>19 A. I just told you no communication.</p> <p>20 Q. Okay. Did you wave, "Hey, Bali"?</p> <p>21 A. That's a form of communication.</p> <p>22 Q. Were you prohibited from having contact or interactions with Bali?</p> <p>24 A. Yes.</p>	<p style="text-align: center;">Page 61</p> <p>1 MR. TEPFER: Objection to form of the question, calls for speculation, foundation, time period you're talking about.</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. I'm -- 20 -- Mr. Baker, 2017, 2018. You know what I'm talking about, right?</p> <p>7 A. I guess the phone was bugged.</p> <p>8 Q. Did you ever listen to any of the phone calls that you were on?</p> <p>10 A. No.</p> <p>11 Q. Did you have access to them?</p> <p>12 A. My lawyer gave me a packet, so I guess I had access to them.</p> <p>14 MR. TEPFER: Just very carefully, there's no attorney-client waiver. You can -- That's a fine answer. But you can't talk about any communications that you had with your lawyer during the federal matter. Okay?</p> <p>19 THE WITNESS: Okay.</p> <p>20 BY MR. BAZAREK:</p> <p>21 Q. The recordings that you did have, whatever happened to them?</p> <p>23 A. I think I still got them.</p> <p>24 Q. And to this day, have you ever listened to</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 62</p> <p>1 them?</p> <p>2 A. No.</p> <p>3 Q. Okay. Other than Bali and Zachary Brown, 4 during the time period of 2017 and 2018, did you sell 5 narcotics to any other person?</p> <p>6 A. I don't know.</p> <p>7 Q. I know in one of your interrogatory answers, 8 you refer to someone named Fay that you sold narcotics 9 to.</p> <p>10 A. I didn't say I sold them to her. I -- Fay 11 came for drugs, but she didn't want it.</p> <p>12 Q. Tell me about your interactions with Fay.</p> <p>13 A. Fay asked for drugs. I said, "I'll see."</p> <p>14 Then what I got, she didn't want.</p> <p>15 Q. What is Fay's full name?</p> <p>16 A. I don't know. I just know her as Fay from the 17 Ida B. Wells.</p> <p>18 Q. How did you come into contact with Fay during 19 2017 or 2018?</p> <p>20 A. I know Fay.</p> <p>21 Q. Right. She just showed up at your front step? 22 How did you have interactions with her?</p> <p>23 A. I seen her around the city. We travel in the 24 same circles, so I would see her from time to time. She</p>	<p style="text-align: center;">Page 64</p> <p>1 Q. Right. Like, say I wanted to call Fay as a 2 witness in the Watts Coordinated Pretrial Proceedings. 3 How do I find her?</p> <p>4 MR. TEPFER: Objection to the form of the question.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I don't know.</p> <p>7 Q. If you see her, can you tell her to call me?</p> <p>8 MR. TEPFER: Objection.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. I'll give you my number, Hale & Monico.</p> <p>11 MR. TEPFER: Objection to the form, argumentative.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. Would you do that?</p> <p>14 A. For what?</p> <p>15 Q. To hear what she has to say.</p> <p>16 A. I don't know --</p> <p>17 MR. TEPFER: Objection: irrelevant. This is not a 18 proper line of questioning.</p> <p>19 MR. BAZAREK: Well, I think it is proper. I'm 20 trying to get information about an individual who 21 Mr. Baker was going to engage in narcotics transactions 22 with. It is relevant.</p> <p>23 MR. TEPFER: Mr. Baker communicates with you 24 through his attorney. So if you -- He is not obligated</p>
<p style="text-align: center;">Page 63</p> <p>1 another person call me Pops.</p> <p>2 Q. Does she have a -- Fay have a boyfriend?</p> <p>3 A. Fay is a lesbian.</p> <p>4 Q. Does Fay have a wife?</p> <p>5 A. I don't know.</p> <p>6 Q. I'm just -- You know, because --</p> <p>7 A. I said I don't know.</p> <p>8 Q. Yeah. If I want to find Fay, how would I find 9 her?</p> <p>10 MR. TEPFER: Objection to the form of the question.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I don't know.</p> <p>13 Q. Well, you said you see her around and you're 14 in the same social circles.</p> <p>15 A. Yeah. I seen her around at that time. I 16 don't know where Fay is right now.</p> <p>17 Q. When is the last time you saw Fay?</p> <p>18 A. 2018.</p> <p>19 Q. Where does Fay live?</p> <p>20 A. I don't know. Just --</p> <p>21 Q. Do you know the names of anyone who is friends 22 with Fay?</p> <p>23 A. Quite sure I do. We lived in the same 24 neighborhood.</p>	<p style="text-align: center;">Page 65</p> <p>1 to answer a question of whether he should contact you on 2 your cell phone directly.</p> <p>3 MR. BAZAREK: That's not what I said. I said pass 4 along the message to Fay. I -- You know, I'd like to 5 talk to her, if she wants to talk to me.</p> <p>6 MR. TEPFER: If that's your request that Ben Baker 7 does that, he'll consult with me and we'll talk about it 8 and we'll get back to you at that request.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. All right. So when Fay told you -- Did she 11 want heroin, too, by the way?</p> <p>12 A. Yeah, she asked for heroin.</p> <p>13 Q. Okay. Had you ever supplied heroin to Fay 14 prior to 2017?</p> <p>15 A. No.</p> <p>16 Q. And you don't know where it was where she 17 approached you and asked you to get her heroin?</p> <p>18 A. No. It could have been anywhere. It could --</p> <p>19 It could've been at one of the reunions or something. I 20 don't know. I don't recall.</p> <p>21 Q. All right. So after she made that request to 22 you, what did you do?</p> <p>23 A. I got back with her once I obtained it.</p> <p>24 Q. Who did you obtain the heroin from?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 66	Page 68
<p>1 A. Jamar.</p> <p>2 Q. How did Jamar give you the heroin that you were going to give to Fay?</p> <p>3 A. He gave it to me in my hand.</p> <p>5 Q. Where were you when Jamar gave you the heroin?</p> <p>6 A. I believe I was at 6215 Rhodes.</p> <p>7 Q. So Jamar came into the house to give you the heroin?</p> <p>9 A. Yeah.</p> <p>10 Q. How much -- Strike that.</p> <p>11 What was the amount of the heroin?</p> <p>12 A. I'm not sure because she just wanted a -- to see what was to it. And she wanted a piece, and she was going to have somebody test it. So I don't know if it was a tenth, or I don't know how much it was. But it wasn't nothing big.</p> <p>17 Q. It was a smaller amount?</p> <p>18 A. It was a piece. Yeah.</p> <p>19 Q. She asked for less narcotics than Bali, true?</p> <p>20 A. True.</p> <p>21 Q. And she wanted to test it?</p> <p>22 A. She wanted to have somebody test it.</p> <p>23 Q. Okay.</p> <p>24 A. Because I don't know her to use drugs other</p>	<p>1 Have an initial for her surname? I know you don't know her surname. But do you know, does it begin with a P, an S, an F?</p> <p>4 A. I don't know. First-name basis.</p> <p>5 Q. Does Fay have a nickname?</p> <p>6 A. Fay --</p> <p>7 Q. Okay.</p> <p>8 A. -- is her name.</p> <p>9 Q. All right. So you call Fay up with her telephone number that you had back in 2017, right?</p> <p>11 A. Yeah.</p> <p>12 Q. And then she shows up at your Rhodes address?</p> <p>13 A. Yeah.</p> <p>14 Q. Do you remember what month it was?</p> <p>15 A. No.</p> <p>16 Q. Have you read -- ever read your federal criminal complaint?</p> <p>17 A. Which one?</p> <p>18 Q. How many are there?</p> <p>19 A. I don't know.</p> <p>21 MR. TEPFER: Objection to the form of the question, federal from a -- the criminal complaint, you said?</p> <p>23 MR. BAZAREK: Yes. Federal criminal complaint.</p> <p>24 Yes.</p>
<p style="text-align: center;">Page 67</p> <p>1 than marijuana.</p> <p>2 Q. All right. So you get the heroin from Jamar. Then what do you do?</p> <p>4 A. I called her and said, "I got what you asked me for."</p> <p>6 Q. By the way, do you still have the same cell phone today that you did when you were engaging in narcotics transactions during 2017 and 2018?</p> <p>9 A. I don't think so.</p> <p>10 Q. What's Fay's phone number?</p> <p>11 A. I don't know. I haven't talked to Fay since -- It's been a while. It's been years.</p> <p>13 Q. Was she -- But you had her contact on your phone?</p> <p>15 A. Yeah.</p> <p>16 Q. Yes?</p> <p>17 A. Yes.</p> <p>18 Q. Do you still have contact for Fay on your phone?</p> <p>20 A. No.</p> <p>21 Q. On your phone, did you have -- Strike that.</p> <p>22 Is Fay a first name or a last name?</p> <p>23 A. First.</p> <p>24 Q. Have a middle initial -- Or strike that.</p>	<p style="text-align: center;">Page 69</p> <p>1 MR. TEPFER: Okay. Forget it.</p> <p>2 BY MR. BAZAREK:</p> <p>3 Q. Is there more than one?</p> <p>4 A. I don't know.</p> <p>5 Q. Okay. Did you ever see an affidavit from an individual from DEA that set forth in the affidavit the different narcotics transactions you engaged in? Did you ever read that?</p> <p>9 A. The only thing that I seen was pertaining to Bali.</p> <p>11 Q. Okay. All right. So what happened when Fay arrived at your apartment on Rhodes?</p> <p>13 A. She called and said she was outside. So I went outside and gave it to her. She left.</p> <p>15 Q. And did -- The narcotics that you gave to her, you had it on your cocktail table?</p> <p>16 A. I had it in my pocket.</p> <p>18 Q. Okay. Was anyone home at the time when you went to deliver the narcotics to Fay?</p> <p>20 A. No. I went right outside and gave it to her.</p> <p>21 Q. Was anyone else inside your house, though?</p> <p>22 That's what I'm asking you.</p> <p>23 A. Not that I recall.</p> <p>24 Q. And did Fay pay you for the narcotics?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 70	Page 72
<p>1 A. No.</p> <p>2 Q. Was there -- So -- Okay. Strike that.</p> <p>3 She just -- She wanted to test the stuff to</p> <p>4 see if it was any good. Fair to say?</p> <p>5 A. Yes.</p> <p>6 Q. And then did she get back to you on that?</p> <p>7 A. Yes.</p> <p>8 Q. And what did she say?</p> <p>9 A. If I can remember correctly, she was like,</p> <p>10 "No, Pop. That ain't it."</p> <p>11 Q. Was it the same type of heroin that you would</p> <p>12 give to -- Strike that.</p> <p>13 Was it the same type of heroin that you would</p> <p>14 sell to Bali?</p> <p>15 MR. TEPFER: Objection to the form of "type."</p> <p>16 If you understand.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I guess.</p> <p>19 Q. Yeah. Just, like, same quality is really my</p> <p>20 question.</p> <p>21 A. I'm saying I guess. I don't know.</p> <p>22 Q. Okay. So that was just one and done with Fay</p> <p>23 for narcotics transactions?</p> <p>24 A. She --</p>	<p>1 Q. All right. So it was two narcotics</p> <p>2 transactions that you had with Fay, correct?</p> <p>3 A. I wouldn't call them transactions because she</p> <p>4 didn't want it.</p> <p>5 Q. But you gave her the heroin, right?</p> <p>6 A. The transaction is money for drugs. It was, I</p> <p>7 guess, a gift.</p> <p>8 Q. Well, you delivered heroin to Fay on two</p> <p>9 occasions, correct?</p> <p>10 MR. TEPFER: Objection to the form of the question.</p> <p>11 It's asked and answered.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I presented drugs. I gave her a piece both</p> <p>14 times. Actually, the second time, she gave it back</p> <p>15 right then. She was like, "No."</p> <p>16 Q. Did she test it in front of you?</p> <p>17 A. No. She just -- I think she had somebody with</p> <p>18 her, too, because she tried to get me to give it to him.</p> <p>19 She didn't want it.</p> <p>20 Q. Who did she have with him?</p> <p>21 A. I don't know who it was.</p> <p>22 Q. Her. Okay. With her.</p> <p>23 Who did she have with her?</p> <p>24 A. I don't know who it -- I never seen the person</p>
<p style="text-align: center;">Page 71</p> <p>1 MR. TEPFER: Objection to form of the question.</p> <p>2 BY THE WITNESS:</p> <p>3 A. She came again, and same result.</p> <p>4 Q. Oh, she -- All right. So did she call you or</p> <p>5 just show up at your doorstep for --</p> <p>6 A. She called. She called.</p> <p>7 Q. Did you ask for payment for the first bit of</p> <p>8 heroin that you gave her?</p> <p>9 A. No.</p> <p>10 Q. Why not?</p> <p>11 A. Because she wanted a piece.</p> <p>12 Q. Small. Okay.</p> <p>13 So then -- But then she calls up and she asks</p> <p>14 for more?</p> <p>15 A. Some months later, I believe.</p> <p>16 Q. Same amount?</p> <p>17 A. She wanted a tester so she could have somebody</p> <p>18 test it.</p> <p>19 Q. And then what was the result of that?</p> <p>20 A. She didn't want it.</p> <p>21 Q. The second time you had the narcotics</p> <p>22 transaction with Fay, did you get that heroin from</p> <p>23 Jamar?</p> <p>24 A. Yes.</p>	<p style="text-align: center;">Page 73</p> <p>1 before.</p> <p>2 Q. So then she passed the heroin back to you?</p> <p>3 A. Yeah.</p> <p>4 Q. And what did you do with that heroin?</p> <p>5 A. I got out the car.</p> <p>6 Q. Right. What did you end up doing with that</p> <p>7 heroin?</p> <p>8 A. I gave it back, said she didn't -- she didn't</p> <p>9 like it.</p> <p>10 Q. You gave it back to who?</p> <p>11 A. Jamar.</p> <p>12 Q. Did Jamar say anything about this rejection of</p> <p>13 the heroin that he was supplying to you?</p> <p>14 A. No.</p> <p>15 Q. Does Jamar know Fay?</p> <p>16 A. Yeah.</p> <p>17 Q. How do they know each other?</p> <p>18 A. They hung in the same area.</p> <p>19 Q. Has Fay ever been arrested, if you know?</p> <p>20 A. I don't know. She may have. I don't know.</p> <p>21 Q. Does -- Do you know who Sondra Cartwright is?</p> <p>22 A. Sondra Cartwright?</p> <p>23 Q. Yes.</p> <p>24 A. Not that name. I might know the face.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 74	Page 76
<p>1 Q. Okay. Anyone else other than Bali, 2 Zachary Brown, and Fay that you sold narcotics to after 3 you were released from prison in 2016?</p> <p>4 MR. TEPFER: Objection to the form of the question, 5 mischaracterizes the prior testimony.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Not that I recall.</p> <p>8 Q. Would anything help you recall?</p> <p>9 A. I don't know.</p> <p>10 Q. Other than -- Well, let me ask you this: You 11 were released from prison in January of 2016, correct?</p> <p>12 A. Correct.</p> <p>13 Q. Since that time, did anyone other than 14 Zachary Brown, Fay, or Bali ask you for narcotics?</p> <p>15 A. I don't recall.</p> <p>16 Q. So are you saying someone could have and you 17 just don't remember?</p> <p>18 A. I'm saying --</p> <p>19 MR. TEPFER: Objection: calls for speculation. He 20 said he doesn't recall.</p> <p>21 BY THE WITNESS:</p> <p>22 A. I'm saying I don't recall.</p> <p>23 Q. Other than -- Strike that.</p> <p>24 Since your release from prison in January</p>	<p>1 did you do with it?</p> <p>2 A. I told you, I gave it to Jamar.</p> <p>3 Q. So, sir, at this deposition, you're saying 4 that whatever money Bali gave to you, you didn't take 5 one cent?</p> <p>6 A. No, other than \$20 that he owed me. But I 7 don't know how much Bali was getting from whoever she 8 was getting it from, how much money. But I just know 9 that wasn't an accurate portrayal, the 3,600.</p> <p>10 Q. Was it more?</p> <p>11 A. No. I believe it was less. But --</p> <p>12 Q. What do you think it was?</p> <p>13 A. Less. But I believe they made me pay whatever 14 they gave to her. So I don't know.</p> <p>15 Q. So you do admit you did keep 20 of the dollars 16 that Bali gave to you to purchase drugs, correct?</p> <p>17 A. No.</p> <p>18 MR. TEPFER: Objection: mischaracterizes the prior 19 testimony, form.</p> <p>20 BY THE WITNESS:</p> <p>21 A. Bali owed me \$20, and she gave it to me out of 22 whatever money they gave her, I guess. She owed me \$20 23 because I gave her more when she was selling me the 24 detergent and stuff.</p>
Page 75	Page 77
<p>1 of 2016, who have you had discussions with about illegal 2 narcotics transactions?</p> <p>3 A. That I remember, it's Bali, Zach, Fay. I 4 guess Jamar, you would put him in there.</p> <p>5 Q. Anyone else?</p> <p>6 A. Well, I used to buy marijuana, so whoever I 7 bought marijuana from. At that time, it was illegal.</p> <p>8 Q. Anyone else?</p> <p>9 A. Not that I recall, sir.</p> <p>10 Q. How much total money did you receive from Bali 11 when you sold him narcotics?</p> <p>12 MR. TEPFER: Objection to the form of the question, 13 mischaracterizes the prior testimony. Okay.</p> <p>14 BY THE WITNESS:</p> <p>15 A. They say it was like 3,000 and some. I think 16 either 3,200 or 3,600.</p> <p>17 Q. What did you do with that money?</p> <p>18 A. What you mean?</p> <p>19 Q. What did you do with the money?</p> <p>20 A. What do you mean?</p> <p>21 Q. What did you do with the \$3,200 or whatever 22 the amount was?</p> <p>23 A. I paid it back to the federal government.</p> <p>24 Q. When you first got the money from Bali, what</p>	<p>1 Q. So is it your testimony that the income that 2 was made for the narcotics that were sold to Bali, that 3 went to Jamar and no one else?</p> <p>4 A. Right.</p> <p>5 Q. Did you ever tell that to Judge Norgle?</p> <p>6 MR. TEPFER: Objection. Well, he's asking -- Okay. 7 Go ahead. You can answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I don't know. I know I never kept a dime of 10 it. None of it went in my pocket.</p> <p>11 Q. Did you tell Judge Norgle that?</p> <p>12 A. I don't know.</p> <p>13 MR. TEPFER: Are you asking if he personally or 14 through his attorney or --</p> <p>15 MR. BAZAREK: Yeah. I'm asking him personally. 16 Yes.</p> <p>17 MR. TEPFER: Okay. Go ahead.</p> <p>18 THE WITNESS: I don't recall telling the judge. I 19 don't recall.</p> <p>20 BY MR. BAZAREK:</p> <p>21 Q. I mean, you had numerous court proceedings in 22 front of Judge Norgle, right?</p> <p>23 A. True.</p> <p>24 Q. You spoke with Judge Norgle, right?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 78	Page 80
<p>1 A. Yes.</p> <p>2 Q. How much money total did you receive from 3 Zachary Brown for the narcotics sales that you made to 4 him?</p> <p>5 MR. TEPFER: Objection to the form of the question, 6 mischaracterizes the testimony.</p> <p>7 Go ahead.</p> <p>8 BY THE WITNESS:</p> <p>9 A. I'm not sure.</p> <p>10 Q. Approximate?</p> <p>11 A. I know when he obtained drugs from me, he was 12 getting like five grams at a time. So -- But I don't 13 recall how many times, so I can't give you a number.</p> <p>14 Q. Yeah. I'm just asking you approximately, 15 Mr. Baker.</p> <p>16 A. I'm not sure.</p> <p>17 Q. Okay. So you're saying you can't approximate?</p> <p>18 A. No, I can't.</p> <p>19 Q. Was it more than ten times?</p> <p>20 A. No.</p> <p>21 Q. Was it more than five times?</p> <p>22 A. I don't know.</p> <p>23 Q. So as you sit here at this deposition, your 24 testimony is you have no knowledge as to the number of</p>	<p>1 Q. And what type of vehicle did you have during 2 2017, 2018?</p> <p>3 A. A Cadillac.</p> <p>4 Q. Is that the only car you had during those two 5 years?</p> <p>6 A. That -- Yeah. That I had. Yeah.</p> <p>7 Q. And what year was -- did you get the -- What 8 year was the Cadillac that you had?</p> <p>9 A. I think it -- I think it was a '08, 2008.</p> <p>10 Q. All right. So you bought it used?</p> <p>11 A. Yes.</p> <p>12 Q. Title was in your name?</p> <p>13 A. No.</p> <p>14 Q. Whose -- Who had title to the Cadillac?</p> <p>15 A. Clarissa.</p> <p>16 Q. So you would use Clarissa's car to transport 17 the illegal narcotics?</p> <p>18 A. Well, it was in her name, but it was my car.</p> <p>19 Q. Why wasn't it in your name?</p> <p>20 A. Because I asked her to go and pick it up, to 21 go get it for me, go pick me a car out.</p> <p>22 Q. Who paid for the car?</p> <p>23 A. Me.</p> <p>24 Q. Where did you get the money to pay for the</p>
Page 79	Page 81
<p>1 times that you engaged in narcotics sales with 2 Zachary Brown?</p> <p>3 MR. TEPFER: Objection to the form of the -- form 4 of the question, and it mischaracterizes the testimony.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Correct, sir.</p> <p>7 MR. BAZAREK: Let's take a five-minute break.</p> <p>8 MR. TEPFER: Okay.</p> <p>9 THE VIDEOGRAPHER: The time is 12:05 p.m. We are 10 now off the record.</p> <p>11 (A short break was had.)</p> <p>12 (Baker Deposition Exhibit</p> <p>13 Nos. 1 through 3 marked for 14 identification.)</p> <p>15 THE VIDEOGRAPHER: The time is 12:16 p.m. We are 16 now back on the record.</p> <p>17 BY MR. BAZAREK:</p> <p>18 Q. Mr. Baker, during 2017 and 2018, did you ever 19 transport illegal narcotics inside of your vehicle?</p> <p>20 MR. TEPFER: Objection to the form of the question. 21 Oh, you know what? I'll withdraw the objection.</p> <p>22 Go ahead.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Yes.</p>	<p>1 car?</p> <p>2 A. It was a loan.</p> <p>3 Q. Who did you get the loan from?</p> <p>4 A. From a fellow -- I guess he was an exoneree.</p> <p>5 Q. Was that -- Who did you get it from?</p> <p>6 Big Ride?</p> <p>7 A. Big Ride? Who is that?</p> <p>8 Q. Do you know who Marvin Reeves is?</p> <p>9 A. I don't know.</p> <p>10 Q. Okay. Who did you get the money from, the 11 exoneree?</p> <p>12 A. I think he was -- he was a Hispanic.</p> <p>13 Q. Did he have a lawsuit?</p> <p>14 A. I don't recall his name.</p> <p>15 Q. Was his first name Juan?</p> <p>16 A. It may have been.</p> <p>17 Q. Did he bring a lawsuit against the City and 18 its police officers?</p> <p>19 MR. TEPFER: Answer if you know.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I believe he did. I'm not sure.</p> <p>22 Q. Did he receive a favorable verdict?</p> <p>23 MR. TEPFER: Objection: calls for speculation, 24 form of the question.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 82	Page 84
<p>1 If you know the answer.</p> <p>2 BY THE WITNESS:</p> <p>3 A. I don't know what he received.</p> <p>4 Q. Was his last name Jimenez?</p> <p>5 A. I'm not sure, sir.</p> <p>6 Q. Okay. What were the terms of the loan that he gave you?</p> <p>7 A. Pay it back.</p> <p>8 Q. Interest-free?</p> <p>9 A. I believe so.</p> <p>10 Q. Okay. Was there anything in writing?</p> <p>11 A. Just pay it back.</p> <p>12 Q. How much money did this individual give you?</p> <p>13 A. I think -- I believe it was \$10,000. And I used it to get the car.</p> <p>14 Q. Do you remember what year and month that was?</p> <p>15 A. No, I don't recall.</p> <p>16 Q. Okay. And did you pay this individual back?</p> <p>17 A. Yes.</p> <p>18 Q. And then how long did it take you to pay him back?</p> <p>19 A. I'm not sure. Maybe eight months. Maybe seven. I'm not sure.</p> <p>20 Q. Okay. So where would you store the -- Strike</p>	<p>1 A. So I wouldn't tell her.</p> <p>2 Q. Is that why?</p> <p>3 A. Probably so.</p> <p>4 Q. Any other reason?</p> <p>5 A. No.</p> <p>6 Q. All right. So you would transport heroin in the Cadillac as you drove to meet Mr. Brown, right?</p> <p>7 A. Yes.</p> <p>8 Q. Was Jamar Lewis ever inside that Cadillac with you?</p> <p>9 A. He's been in there.</p> <p>10 Q. Did he have illegal narcotics with him when he would be inside your Cadillac?</p> <p>11 MR. TEPFER: Objection: calls for speculation.</p> <p>12 If you know, you can answer.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I don't know if he had any hard drugs. But I know we used to smoke marijuana in there.</p> <p>15 Q. Yeah. So at any time did Jamar Lewis ever have heroin or cocaine or fentanyl while inside your Cadillac that you know of?</p> <p>16 A. Not that I know of, no.</p> <p>17 Q. What type of vehicle did Jamar drive during 2017 and 2018?</p>
<p>1 that.</p> <p>2 Where would you store the illegal narcotics inside the Cadillac?</p> <p>3 A. In my hand.</p> <p>4 Q. Anywhere else?</p> <p>5 A. In my hand.</p> <p>6 Q. Right. Anywhere else in the car other than your hand?</p> <p>7 A. Not that I recall, no. When I would travel with -- I only traveled to serve Zachary Brown, I believe. That's when I had the illegal drugs in my car.</p> <p>8 Q. So you would drive to him?</p> <p>9 A. Yeah. We would meet in different places.</p> <p>10 Q. Yeah. Did you ever tell Clarissa that you were engaging in narcotics transactions during 2017 and 2018?</p> <p>11 A. For what?</p> <p>12 Q. Did you?</p> <p>13 A. No.</p> <p>14 Q. Why not?</p> <p>15 A. Why?</p> <p>16 Q. Yes.</p> <p>17 A. That's what I'm saying. Why would I?</p> <p>18 Q. You knew she would be upset with you?</p>	<p>1 A. I know he used to be in that Mercedes.</p> <p>2 Q. What color was it?</p> <p>3 A. White.</p> <p>4 Q. Was that his Mercedes or his girlfriend?</p> <p>5 A. I'm not sure.</p> <p>6 Q. Have --</p> <p>7 A. Because -- I'm not sure.</p> <p>8 Q. Were you ever inside the Mercedes with Jamar?</p> <p>9 A. I actually -- Yes, I've been in there with Jamar.</p> <p>10 Q. Okay. Did Jamar ever supply you with illegal narcotics while you were inside the Mercedes?</p> <p>11 A. When Jamar brought me the heroin, he would bring it to the house.</p> <p>12 Q. And would he drive the Mercedes to your house?</p> <p>13 A. I mean, he has driven the Mercedes to my house.</p> <p>14 Q. With the narcotics inside to give to you?</p> <p>15 A. I guess. I'm not sure. I mean, I don't know.</p> <p>16 Q. During all the times where Jamar Lewis provided you with illegal narcotics during 2017 and 2018, did he always give them to you in one of the apartments you were living at?</p> <p>17 A. When I would call him for drugs, yes, he would</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 86	Page 88
<p>1 bring it to me.</p> <p>2 Q. And he would actually come inside to your 3 apartment, right?</p> <p>4 A. Yeah.</p> <p>5 Q. And that was both on Rhodes and Vernon, 6 correct?</p> <p>7 A. Correct.</p> <p>8 Q. Other than the cocktail table that you 9 described, did you store the heroin in any other place 10 in either of your apartments?</p> <p>11 A. It was never that long enough to actually 12 store it. I mean, five grams here, five grams there. 13 It wasn't -- It was only there when somebody would call 14 for it.</p> <p>15 Q. Were there times where you received the heroin 16 from Jamar during 2017 or 2018 and your customer didn't 17 show up to get it on the same day?</p> <p>18 A. No.</p> <p>19 MR. TEPFER: Objection --</p> <p>20 BY THE WITNESS:</p> <p>21 A. I don't think so.</p> <p>22 MR. TEPFER: -- to the term "customer."</p> <p>23 But go ahead.</p> <p>24</p>	<p>1 A. No.</p> <p>2 Q. Did you ever tell anyone that?</p> <p>3 A. No. I don't recall telling nobody that. I 4 don't know.</p> <p>5 Q. Okay. During 2017, did you go on any cruise?</p> <p>6 A. Yeah.</p> <p>7 Q. Do you remember what month it was?</p> <p>8 A. I'm not sure as to the month. I'm not sure 9 what month it was. But I did go on a cruise.</p> <p>10 Q. Who did you go on that cruise with?</p> <p>11 A. It was me, Clarissa, Jamar, 12 Atanise (phonetic), and then it was Henry.</p> <p>13 Q. Henry Thomas?</p> <p>14 A. Yeah. And his lady. But I don't recall her 15 name because that was the first time I met her, so I 16 don't recall her name. But I do know they drove and we 17 flew because he's scared of planes.</p> <p>18 Q. Who has got planes?</p> <p>19 A. He's scared to fly.</p> <p>20 Q. Oh. And you've -- Henry Thomas, close friend 21 of yours. Agreed?</p> <p>22 A. No.</p> <p>23 Q. How did he end up going on a cruise with you?</p> <p>24 A. He a friend of Jamar's.</p>
<p style="text-align: center;">Page 87</p> <p>1 BY THE WITNESS:</p> <p>2 A. I don't believe -- I don't believe so, no.</p> <p>3 Q. Okay. So as you sit here today at this 4 deposition, on the day you received the heroin from -- 5 Strike that.</p> <p>6 On the days that you received the heroin from 7 Jamar, when he'd come to your house and give you the 8 heroin, you would provide it to the buyer on that same 9 day, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. What do you know about Jamar Lewis's 12 narcotics operations during 2017 and 2018?</p> <p>13 A. I know when I would call him for it, he would 14 bring it to me.</p> <p>15 Q. Who did Jamar Lewis get his illegal narcotics 16 to sell from?</p> <p>17 A. I don't know.</p> <p>18 Q. Did you know who his supplier was?</p> <p>19 A. No.</p> <p>20 Q. During 2017 and 2018, did you ever have a 21 supplier of narcotics who lives somewhere in the 22 suburbs?</p> <p>23 A. Me?</p> <p>24 Q. Yes.</p>	<p style="text-align: center;">Page 89</p> <p>1 Q. Okay.</p> <p>2 A. Well, close friend of Jamar's. He's an 3 associate. I know him.</p> <p>4 Q. Do you know his nickname?</p> <p>5 A. We call him Hen.</p> <p>6 Q. Like Big Hen or Hen?</p> <p>7 A. Instead of Henry, yes, we just shorten it, 8 Hen.</p> <p>9 Q. And he sold narcotics out of the 527 building, 10 right?</p> <p>11 A. Yeah. Back in the day, yeah.</p> <p>12 Q. Did he sell narcotics for you back in the day?</p> <p>13 A. He sold narcotics for him.</p> <p>14 Q. Would you supply Henry Thomas with narcotics 15 back in the day?</p> <p>16 A. I probably did before. I'm not sure. But I 17 probably did.</p> <p>18 MR. TEPFER: Don't guess. If you know, you know.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. Do you know -- Strike that.</p> <p>21 So Jamar Lewis and Henry Thomas, they're close 22 friends --</p> <p>23 A. Yes.</p> <p>24 Q. -- would you say?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 90	Page 92
<p>1 A. Yes. They grew up together.</p> <p>2 Q. And who was the lady that Jamar took on the cruise?</p> <p>3 A. His kid's mother.</p> <p>5 Q. Okay. Not Toya?</p> <p>6 A. Not Toya.</p> <p>7 Q. Okay. And it's -- Did you enjoy the cruise?</p> <p>8 A. I guess.</p> <p>9 Q. Where did you get the money to go on the cruise?</p> <p>10 A. Jamar paid for it.</p> <p>12 Q. Did he pay for Henry Thomas, too?</p> <p>13 A. I don't know.</p> <p>14 Q. Did -- When you were on the cruise -- You went on the cruise after you filed the federal lawsuit, right?</p> <p>17 A. Yeah, I believe so.</p> <p>18 Q. Okay. And the cruise that you went on, that was before you were arrested by federal authorities, correct?</p> <p>21 A. Correct.</p> <p>22 Q. Did you talk to Jamar or Henry Thomas at all about your lawsuit?</p> <p>24 A. No. For what?</p>	<p>1 the Bahamas.</p> <p>2 Q. During that cruise, did you ever receive any texts or --</p> <p>4 A. No service.</p> <p>5 Q. No service?</p> <p>6 A. (Shaking head.)</p> <p>7 Q. Okay. How about Jamar?</p> <p>8 MR. TEPFER: Objection: calls for speculation.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. If you know.</p> <p>11 A. I don't know.</p> <p>12 Q. So during -- Was it -- When you went on the cruise, was it during the summer months? spring? winter? Do you know the season?</p> <p>15 A. No, I don't know the -- I don't recall the season. I'm -- because it was hot where we was at. And then we got on the cruise in Florida. So -- But I don't recall. I believe it was -- But I don't know.</p> <p>19 Q. Okay. All right. So during the -- Obviously, you're out at sea somewhere?</p> <p>21 A. Yeah.</p> <p>22 Q. You're not -- Did you engage in any narcotics transactions while on that boat?</p> <p>24 A. With who? No.</p>
<p style="text-align: center;">Page 91</p> <p>1 Q. Never came up?</p> <p>2 A. For what?</p> <p>3 Q. Did Henry Thomas or Jamar say, "Yeah, I'm going to file a lawsuit, too"? Did they ever say that to you?</p> <p>6 A. No.</p> <p>7 Q. Okay. Did you use any of your own money during this cruise that you took?</p> <p>9 A. I believe so, yes.</p> <p>10 Q. So what did Jamar pay for at least --</p> <p>11 A. The actual --</p> <p>12 Q. -- in terms of you and -- in relation to you and Clarissa's travel?</p> <p>14 A. Just that, the travel and the accommodations for the cruise.</p> <p>16 Q. Okay. So airfare and then the actual cruise?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And was it all-inclusive?</p> <p>19 A. Yes.</p> <p>20 Q. And that's drinks, food, everything?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And then where did you go?</p> <p>23 A. I know we went to the Bahamas. And then I don't remember the other places. But I know we went to</p>	<p style="text-align: center;">Page 93</p> <p>1 Q. That's a no, right?</p> <p>2 A. No, I didn't --</p> <p>3 Q. Okay.</p> <p>4 A. -- give anybody drugs on the cruise.</p> <p>5 Q. Okay. Did Jamar bring any narcotics with him on the trip?</p> <p>7 A. I mean, we smoked some marijuana on the cruise. But that's it.</p> <p>9 Q. Yeah. On the cruise, did you ever see Jamar with heroin, cocaine, anything like that?</p> <p>11 A. No.</p> <p>12 Q. Okay. And did you -- Or so you didn't have service. And the reason I'm asking, I wanted to know if you were fielding, you know, phone calls or texts from the three people that you said you engaged in narcotics transactions with.</p> <p>17 A. No.</p> <p>18 Q. Okay. And then how long were you gone on the trip?</p> <p>20 A. I think it was like a five day, four -- five day, four nights. I'm not sure. But I believe it was five days, four nights, something like that.</p> <p>23 Q. All right. Would you say you had a nice time?</p> <p>24 A. I mean, I wasn't in jail, so I guess it was</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 94	Page 96
<p>1 better than being in jail.</p> <p>2 Q. I mean, you were with Clarissa, right?</p> <p>3 A. Yeah.</p> <p>4 Q. The woman you love?</p> <p>5 A. Always a nice time with Clarissa.</p> <p>6 Q. Did she have a nice time on the trip?</p> <p>7 A. She was with me.</p> <p>8 Q. But did you have a nice time on the trip</p> <p>9 together?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And was that the first vacation you</p> <p>12 went on after you were released from prison?</p> <p>13 A. Well, I don't know if that -- Well, I know we</p> <p>14 went to the Innocence Project down in San Antonio. So</p> <p>15 that was like a vacation to us because we never been</p> <p>16 there.</p> <p>17 Q. And what year and month did you go to the</p> <p>18 Innocence Project?</p> <p>19 A. I believe it was 2016.</p> <p>20 Q. Oh, same year you were released from prison?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. Did you speak there?</p> <p>23 A. I'm not sure. I mean, I talked to some other</p> <p>24 exonerees from different places. But I don't know if I</p>	<p>1 answer that question at this deposition.</p> <p>2 BY MR. BAZAREK:</p> <p>3 Q. Mr. Baker, could you answer that question but</p> <p>4 for your attorney telling you not to answer it?</p> <p>5 MR. TEPFER: Hold on. Could you answer that</p> <p>6 question but -- If you understand that question, I --</p> <p>7 it's a yes or no answer.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Yes.</p> <p>10 Q. All right. But you're going to follow your</p> <p>11 attorney's advice and not answer it, correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. Let me ask you, other than the trip on</p> <p>14 the Exoneration Project's dime and Jamar Lewis paying</p> <p>15 your expenses for the cruise, did you get any -- have</p> <p>16 any other free trips since your release from prison?</p> <p>17 MR. TEPFER: Objection to the form of the question,</p> <p>18 mischaracterizes the testimony.</p> <p>19 If you understand the question, you can</p> <p>20 answer.</p> <p>21 BY THE WITNESS:</p> <p>22 A. No.</p> <p>23 Q. So what about other -- I did start to ask you</p> <p>24 about vacations, that type of thing. I know you went on</p>
<p style="text-align: center;">Page 95</p> <p>1 actually, like, spoke. I don't remember.</p> <p>2 Q. Okay. And then who paid for that trip?</p> <p>3 A. I was a guest of the law firm.</p> <p>4 Q. What law firm?</p> <p>5 A. The Exoneration Project.</p> <p>6 Q. Is that out of the University of Chicago?</p> <p>7 A. I guess.</p> <p>8 Q. Is that who Josh works for, your attorney who</p> <p>9 is here with you right now?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And then who else went with you on the</p> <p>12 trip?</p> <p>13 A. Clarissa went with me, but she paid for</p> <p>14 herself.</p> <p>15 Q. Okay. So you -- All right. So everything you</p> <p>16 had was comped?</p> <p>17 MR. TEPFER: I'm going to object to questions along</p> <p>18 this line and assert work product privilege.</p> <p>19 MR. BAZAREK: You're instructing him not to answer?</p> <p>20 MR. TEPFER: I am.</p> <p>21 MR. BAZAREK: As to whether or not the Exoneration</p> <p>22 Project provided Mr. Baker with money for a trip?</p> <p>23 MR. TEPFER: I'm advising him not to answer</p> <p>24 questions about how -- Yeah. Yes. He's not going to</p>	<p style="text-align: center;">Page 97</p> <p>1 a cruise. I know you had the trip that you went on with</p> <p>2 Clarissa to Texas. Any other vacations that you've been</p> <p>3 on since you were released from prison?</p> <p>4 A. We just came back from the Dominican Republic.</p> <p>5 Q. Who did you go with?</p> <p>6 A. Clarissa.</p> <p>7 Q. Kids go?</p> <p>8 A. No.</p> <p>9 Q. How long were you in the Dominican Republic?</p> <p>10 A. I think we was gone for a week.</p> <p>11 Q. Was it a nice time?</p> <p>12 A. Yes.</p> <p>13 Q. Did you enjoy yourself?</p> <p>14 A. Yes.</p> <p>15 Q. Clarissa enjoy herself?</p> <p>16 A. Yes.</p> <p>17 Q. What types of things did you do on the trip to</p> <p>18 the Dominican Republic?</p> <p>19 A. Well, we went ATV'ing, zip-lined. We had</p> <p>20 dinner in the sky. We swam with the dolph- -- well, I</p> <p>21 swam because she don't -- she scared. We laid by the</p> <p>22 pool, went to dinner a few times.</p> <p>23 Q. Sounds like a great time.</p> <p>24 MR. TEPFER: Is that a question?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 98	Page 100
<p>1 BY MR. BAZAREK:</p> <p>2 Q. Was the weather good?</p> <p>3 A. Yes. But we did get sunburned.</p> <p>4 Q. Was it all-inclusive?</p> <p>5 A. Yes.</p> <p>6 Q. Did you enjoy, like, good cocktails there?</p> <p>7 A. There were drinks there.</p> <p>8 Q. So not the best?</p> <p>9 A. Right.</p> <p>10 Q. Okay.</p> <p>11 MR. TEPFER: Far afield here, but go ahead.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. So let's take a look at Exhibit Number 1. And these are -- Do you have it in front of you, Exhibit 1?</p> <p>14 A. That's what this is?</p> <p>15 Q. Yeah. So these are Plaintiffs Ben Baker and Clarissa Glenn's responses to Defendant Officer Brian Bolton's first set of interrogatories. Do you see that caption?</p> <p>16 MR. TEPFER: For the record, this is the version that was signed on 4/20/2017, and these were supplemented up until yesterday. So --</p> <p>17 MR. BAZAREK: Okay.</p> <p>18 MR. TEPFER: -- just for the record, that's the one</p>	<p>1 Q. And there's a verification from you, right?</p> <p>2 A. Yes.</p> <p>3 Q. Can you read it? Can you read the verification?</p> <p>4 A. I could.</p> <p>5 Q. Yes. Please do.</p> <p>6 A. Oh, you're asking me to read it?</p> <p>7 Q. Yes.</p> <p>8 A. Oh. "I, Ben Baker, certify that I have reviewed the foregoing responses to Defendant Bolton's first set of interrogatories and certify that the responses are true and correct to the best of my knowledge, information, and memory."</p> <p>9 Q. And then you -- That's -- You signed that verification and you dated it April 20, 2017. Is that right?</p> <p>10 A. Yeah.</p> <p>11 Q. Do you remember where you were when you signed it?</p> <p>12 A. I think I was at the law firm.</p> <p>13 Q. At Loevy & Loevy?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. On Aberdeen?</p> <p>16 A. Or May. One of them.</p>
<p style="text-align: center;">Page 99</p> <p>1 we're --</p> <p>2 MR. BAZAREK: Yeah.</p> <p>3 MR. TEPFER: -- looking at.</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. You have it in front -- That's your answer that you gave to Officer Bolton in 2017, right?</p> <p>6 A. To Officer Bolton?</p> <p>7 Q. Yeah. Brian -- Do you know who Brian Bolton is?</p> <p>8 A. Yeah, I know who he is.</p> <p>9 Q. Okay.</p> <p>10 A. But he didn't question me.</p> <p>11 Q. Okay. But you have -- you have interrogatory answers that you gave back in 2017 --</p> <p>12 A. Yes.</p> <p>13 Q. -- as Defense Exhibit Number 1, right?</p> <p>14 A. Yes. My name is there.</p> <p>15 Q. Or Deposition Exhibit Number 1.</p> <p>16 A. My name is there.</p> <p>17 Q. Okay. And if --</p> <p>18 A. First set of interrogatories?</p> <p>19 Q. Yeah. And so if you go to the very last page, can you take a look at the very last page?</p> <p>20 A. Yes.</p>	<p style="text-align: center;">Page 101</p> <p>1 Q. Or May. One. Okay. Understood.</p> <p>2 And you read these interrogatory answers that you gave before you signed the verification, right?</p> <p>3 A. Some.</p> <p>4 Q. Oh, did you skip some?</p> <p>5 A. Yeah.</p> <p>6 Q. Why is that?</p> <p>7 A. Because I was with my lawyers. I didn't think that they would have me with something that was no good for me.</p> <p>8 Q. Okay. So is it your testimony that you didn't read all of the answers that you gave to Bolton's interrogatories?</p> <p>9 A. I probably didn't read all the questions.</p> <p>10 Q. Well, the ones that you did read, were you truthful?</p> <p>11 A. To the best of my knowledge.</p> <p>12 Q. Okay. So I want to ask you, take a look at Interrogatory Number 10.</p> <p>13 A. What page?</p> <p>14 MR. TEPFER: I think it's about six pages in, right? I got seven pages in is the question you want.</p> <p>15 THE WITNESS: Where it say "Please identify any and all employment"?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 102	Page 104
<p>1 BY MR. BAZAREK:</p> <p>2 Q. Yes, that's the one. Okay. And you would --</p> <p>3 You agree you were asked for any and all employment you</p> <p>4 had during the past five years, right?</p> <p>5 A. The past five years?</p> <p>6 Q. Right. You were --</p> <p>7 A. From this -- From this day?</p> <p>8 Q. Right. When you -- When you got these -- When</p> <p>9 you signed off on these interrogatories in April</p> <p>10 of 2017 --</p> <p>11 A. Okay.</p> <p>12 Q. -- Interrogatory 10, it asks you "Please</p> <p>13 identify any and all employment you have had during the</p> <p>14 past five years," right? In part, it says that,</p> <p>15 correct?</p> <p>16 A. Okay.</p> <p>17 Q. Did you read this one before you answered it?</p> <p>18 A. I don't know.</p> <p>19 Q. Okay. Well, take -- In your answer, if you go</p> <p>20 to the very next page, in the interrogatory, you</p> <p>21 reference the employment that you had while you were</p> <p>22 incarcerated, correct?</p> <p>23 A. Yes.</p> <p>24 Q. But the last -- I'm sorry. Not the last</p>	<p>1 A. I haven't -- Yes.</p> <p>2 Q. Okay. So here's my question: Why didn't you</p> <p>3 include that you were selling narcotics?</p> <p>4 MR. TEPFER: Objection to the form of the question.</p> <p>5 It's asked and answered. It misstates the prior</p> <p>6 testimony. It's argumentative.</p> <p>7 Go ahead.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Because that's not a job.</p> <p>10 Q. So it's your testimony that selling narcotics,</p> <p>11 that's not a -- that's not a form of employment, I</p> <p>12 guess, when you're a drug dealer?</p> <p>13 MR. TEPFER: Objection to mischaracterizes the</p> <p>14 testimony.</p> <p>15 BY THE WITNESS:</p> <p>16 A. It's not a job. I don't consider it a job.</p> <p>17 Q. So what do you consider it?</p> <p>18 A. It's not something that I would classify as a</p> <p>19 job. I mean, I can't file taxes on it; could I?</p> <p>20 Q. So you would agree --</p> <p>21 A. I'm asking.</p> <p>22 MR. TEPFER: It's okay. Go ahead.</p> <p>23 BY MR. BAZAREK:</p> <p>24 Q. Well, you could pay taxes on --</p>
<p style="text-align: center;">Page 103</p> <p>1 sentence. Yeah. The first paragraph on the next page,</p> <p>2 I'll just read it. "Plaintiff Baker is able to work and</p> <p>3 he has been applying for jobs since his release from</p> <p>4 IDOC, but he has not been" --</p> <p>5 A. Where is that? Where is that?</p> <p>6 MR. TEPFER: You said the last paragraph. I think</p> <p>7 you're reading the --</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Oh, I'm sorry. The last sentence of the</p> <p>10 first -- The last sentence of the first paragraph is</p> <p>11 where I'm reading, Mr. Baker.</p> <p>12 MR. TEPFER: It's the second to last sentence.</p> <p>13 THE WITNESS: Okay. I see.</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. Yes. Second to last sentence. All right.</p> <p>16 I'm going to read it. It says "Plaintiff Baker is able</p> <p>17 to work and he has been applying for jobs since his</p> <p>18 release from IDOC, but he has not been successful."</p> <p>19 Next sentence, "Plaintiff Baker does not claim any lost</p> <p>20 wages." Do you see that?</p> <p>21 A. Yeah.</p> <p>22 Q. And that was your answer, right?</p> <p>23 A. Right.</p> <p>24 Q. Was that truthful?</p>	<p style="text-align: center;">Page 105</p> <p>1 A. I said could I file taxes on it?</p> <p>2 Q. Yeah. I don't know.</p> <p>3 A. Right.</p> <p>4 Q. All right. So --</p> <p>5 MR. TEPFER: This calls -- This whole line of</p> <p>6 questioning is speculative because he's already</p> <p>7 testified there was no income associated with whatever</p> <p>8 the allegations are. So move to strike that whole</p> <p>9 conversation. But go ahead.</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q. Here's my question to you: Why didn't you</p> <p>12 include that you were selling drugs in 2017 on this</p> <p>13 interrogatory answer for Number 10?</p> <p>14 MR. TEPFER: Objection: This has been asked and</p> <p>15 answered. It mischaracterizes the prior testimony, as</p> <p>16 I've said several times.</p> <p>17 If you need to go ahead and answer again, go</p> <p>18 ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. Because I don't consider that as a job.</p> <p>21 Q. Any other reason?</p> <p>22 A. Simple and plain. It's not a job.</p> <p>23 Q. Okay. Let's take a look at Exhibit Number 2.</p> <p>24 MR. TEPFER: Once again, I note that this is an</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 106	Page 108
<p>1 August 7, 2017, response to Kallatt Mohammed's 2 interrogatories that's marked. It was supplemented as 3 recently as yesterday.</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. All right. Mr. Baker, do you have 6 Exhibit Number 2 in front of you?</p> <p>7 A. Yes.</p> <p>8 Q. And Exhibit Number 2 is Plaintiff Ben Baker's 9 responses to Defendant Kallatt Mohammed's first set of 10 interrogatories, correct?</p> <p>11 A. That's what it says.</p> <p>12 Q. All right. And then take a look at the last 13 page. There's a verification. Can you read the 14 verification on the last page?</p> <p>15 A. Yes.</p> <p>16 Q. Go ahead. Read it out loud.</p> <p>17 A. "I, Ben Baker, verify that I have reviewed the 18 attached supplemental responses to Defendant Mohammed's 19 interrogatories, and I certify that the answers are true 20 and correct to the best of my information and memory."</p> <p>21 Q. I think you misspoke there. Was it "to the 22 best of my knowledge, information, and memory"? Why 23 don't you try -- Let's do it one more time. I think you 24 missed a word.</p>	<p>1 A. And eloquently.</p> <p>2 Q. Okay. And you answered that question back in 3 August of '17, right?</p> <p>4 A. Yes.</p> <p>5 Q. And I -- There's a lawyer objection that's 6 made. Your answer is actually the last line of the 7 answer to 1. Do you see that?</p> <p>8 MR. TEPFER: Objection to the characterization as a 9 lawyer objection.</p> <p>10 But go ahead.</p> <p>11 BY THE WITNESS:</p> <p>12 A. I see it.</p> <p>13 Q. Can you read it?</p> <p>14 A. The answer?</p> <p>15 Q. The answer.</p> <p>16 A. "Subject to and without waiving these 17 objections and limited to the time period of 1997 to 18 present, Plaintiff Baker sold cocaine and heroin at 19 various times between approximately 1998 to 2004."</p> <p>20 Q. You would agree, Mr. Baker, there's nothing in 21 your answer to Interrogatory Number 1 about the 22 narcotics transactions you engaged in during 2017 23 and 2018?</p> <p>24 MR. TEPFER: Objection and note for the record that</p>
<p style="text-align: center;">Page 107</p> <p>1 A. "To the best of my knowledge, information, and 2 memory."</p> <p>3 Q. Okay. And you signed that on August 7, 2017, 4 right?</p> <p>5 A. Yes.</p> <p>6 Q. And that was the -- That was one of the years 7 where you were selling narcotics, right?</p> <p>8 MR. TEPFER: Objection: mischaracterizes the 9 testimony, form of the question.</p> <p>10 You can answer the question as asked.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And let's take a look at Interrogatory 14 Number 1 from Exhibit 2. And I'll just read the 15 question for you that you were asked. "Have you ever 16 personally engaged in drug-related activities? If your 17 answer is yes, then please identify by specific year or 18 specific period of years any time that you engaged in 19 drug-related activities and for each such year or period 20 of years, describe your activities, i.e., sold, 21 manufactured, etc., and the types of controlled 22 substance involved," right? Do you see that?</p> <p>23 A. Yeah.</p> <p>24 Q. Did I read it accurately?</p>	<p style="text-align: center;">Page 109</p> <p>1 this was supplemented as much as -- as recently as 2 yesterday.</p> <p>3 But you can answer the question based on this 4 document.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Yes.</p> <p>7 Q. Why didn't you --</p> <p>8 MR. PALLE: Excuse me. I must say -- I must say, 9 Mr. Tepfer, that your repeated coaching here is really 10 inappropriate. The documents are the documents. You 11 know, you'll have a chance at some point, perhaps, to 12 rehabilitate. But that was really contrary to the 13 federal rules.</p> <p>14 MR. TEPFER: You can answer the question.</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. Do you want me to read the question back?</p> <p>17 A. I just answered it. I said yes.</p> <p>18 Q. Why didn't you include the narcotics sales 19 that you engaged in during 2017 and 2018?</p> <p>20 A. When I -- When I --</p> <p>21 MR. TEPFER: Hold on. Objection to the form of the 22 question. It mischaracterizes the prior testimony.</p> <p>23 Go ahead.</p> <p>24</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 110	Page 112
<p>1 BY THE WITNESS:</p> <p>2 A. When I signed this, I was under the impression</p> <p>3 that we was strictly talking about Watts.</p> <p>4 Q. Well, there's nothing in Question 1 that says</p> <p>5 it's limited to --</p> <p>6 A. No, it's not.</p> <p>7 Q. -- Watts, right?</p> <p>8 MR. TEPFER: Objection: argumentative.</p> <p>9 Go ahead.</p> <p>10 BY THE WITNESS:</p> <p>11 A. No, it's not. But we was talking about Watts.</p> <p>12 This was about the Watts case. So I just assumed it was</p> <p>13 all about Watts and his team.</p> <p>14 Q. So you intentionally left out information</p> <p>15 about the drug dealing that you were doing in 2017 and</p> <p>16 2018 because it wasn't related to the Watts litigation?</p> <p>17 MR. TEPFER: Objection: mischaracterizes the</p> <p>18 testimony in multiple ways about intentionality and</p> <p>19 about characterizing it as -- I think you said selling</p> <p>20 again.</p> <p>21 But go ahead. You can answer the question.</p> <p>22 BY THE WITNESS:</p> <p>23 A. No.</p> <p>24 MS. HARRIS: Can we take a one-minute break,</p>	<p>1 MR. TEPFER: Objection: asked and answered many,</p> <p>2 many times.</p> <p>3 MR. BAZAREK: That's incorrect, Josh.</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. Go ahead.</p> <p>6 A. Yes.</p> <p>7 Q. Right. Because it says -- The question is</p> <p>8 "Have you ever personally engaged in drug-related</p> <p>9 activities?" That's a question mark. And you agree you</p> <p>10 were engaged in drug-related activities -- right? --</p> <p>11 in 2017?</p> <p>12 MR. TEPFER: Objection: There's multiple</p> <p>13 objections to the question, including specifically to</p> <p>14 drug-related activities.</p> <p>15 So to the extent you want to answer that</p> <p>16 question or you understand it, go ahead.</p> <p>17 BY THE WITNESS:</p> <p>18 A. Would you ask the question again?</p> <p>19 Q. You've already testified that you were engaged</p> <p>20 in drug-related activities during 2017, correct?</p> <p>21 A. Yes.</p> <p>22 Q. This question specifically asks you have you</p> <p>23 ever personally engaged in drug-related activities,</p> <p>24 right?</p>
<p style="text-align: center;">Page 111</p> <p>1 please? Just one minute.</p> <p>2 THE VIDEOGRAPHER: The time is 12:52 p.m. We are</p> <p>3 now off the record.</p> <p>4 (A short break was had.)</p> <p>5 THE VIDEOGRAPHER: The time is 12:53 p.m. We are</p> <p>6 now back on the record.</p> <p>7 BY MR. BAZAREK:</p> <p>8 Q. What do you mean by no?</p> <p>9 A. I thought we was just talking about Watts</p> <p>10 case. I thought -- I was under the impression that we</p> <p>11 was talking about Watts case.</p> <p>12 Q. Right. So then you intentionally left out the</p> <p>13 narcotics transactions you engaged in at least in 2017</p> <p>14 from that answer, right?</p> <p>15 MR. TEPFER: Objection: mischaracterizes the</p> <p>16 testimony, argumentative, and form and asked and</p> <p>17 answered.</p> <p>18 BY THE WITNESS:</p> <p>19 A. No. That was not my intention. I just was</p> <p>20 under the impression that we was talking about during</p> <p>21 the time period of Watts.</p> <p>22 Q. Well, but in 2017, at the point you signed</p> <p>23 these interrogatories, you were engaged in drug-related</p> <p>24 activities, right?</p>	<p style="text-align: center;">Page 113</p> <p>1 A. Yes.</p> <p>2 MR. TEPFER: Objection: asked and answered.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. So why didn't you include the drug deals that</p> <p>5 you did with Bali on this answer?</p> <p>6 MR. TEPFER: Objection: asked and answered.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Because I was under the impression that we was</p> <p>9 strictly talking about Watts case.</p> <p>10 Q. So as you're sitting here reading it, you know</p> <p>11 you're doing drug deals with Bali in 2017. Did you</p> <p>12 think about it for a minute and said, "Ah, that's not</p> <p>13 important to include on this answer"?</p> <p>14 MR. TEPFER: Objection: argumentative, foundation.</p> <p>15 You're saying sitting here reading it. Are you talking</p> <p>16 about 2017, or are you talking about today?</p> <p>17 MR. BAZAREK: Yeah. I'm talking about 2017.</p> <p>18 BY THE WITNESS:</p> <p>19 A. No.</p> <p>20 Q. So you didn't give it a second thought?</p> <p>21 A. No, because I thought I was being questioned</p> <p>22 on the Watts case.</p> <p>23 Q. In your answer to Interrogatory Number 1, you</p> <p>24 agree you only note that you sold cocaine and heroin at</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: right;">Page 114</p> <p>1 various times between approximately 1998 to 2004, 2 correct? 3 A. On here, yes. 4 Q. Is that truthful? 5 MR. TEPFER: Objection to -- I don't -- the form of 6 the question. I don't understand the question. 7 BY MR. BAZAREK: 8 Q. Is that a truthful answer, "Plaintiff Baker 9 sold cocaine and heroin at various times between 10 approximately 1998 to 2004"? 11 MR. TEPFER: Are you asking if that's a truthful 12 statement or -- 13 MR. BAZAREK: Yes. 14 BY THE WITNESS: 15 A. Well, for what I thought I was talking about, 16 yes. 17 Q. Well, it's true you were a drug dealer from 18 approximately 1998 to 2004, at least according to this 19 answer, right? 20 A. Yes. I sold drugs during that time. 21 Q. Okay. And you sold drugs out of Ida B. Wells, 22 right? 23 A. Out of the Extensions, yes. 24 Q. Okay. Where would you store your narcotics</p>	<p style="text-align: right;">Page 116</p> <p>1 asking you about your drug-related activities, right? 2 MR. TEPFER: Objection to the form. The 3 question -- 4 BY MR. BAZAREK: 5 Q. Is that yes? 6 MR. TEPFER: -- asks about various things. 7 But go ahead. 8 MR. BAZAREK: Plenty of speaking objections here 9 throughout -- I'll just note that -- through this 10 deposition. 11 BY MR. BAZAREK: 12 Q. But anyway, it's asking you for -- 13 A. It's saying from -- since my release from 14 prison for attempted murder in Cook County? 15 Q. Yes. Since that time. Yes. Right? 16 A. It says "If your answer is yes, then 17 specifically identify every geographic location where 18 you engaged in such activities." 19 Q. Right. And then there's this lawyer objection 20 that's made. And then the answer is, the geographic 21 location for the drug-related activities, you give the 22 address of 527 East Browning Street, correct? 23 MR. TEPFER: Objection to the characterization of 24 the lawyer objection.</p>
<p style="text-align: right;">Page 115</p> <p>1 that you sold between 1998 to 2004? 2 A. Various places. 3 Q. Where? 4 A. In vacant apartments. A lot of times, in 5 vacant apartments. 6 Q. How about the apartment that you lived in with 7 Clarissa and your children? 8 A. Once. 9 Q. So from 1998 to 2004, it's your testimony you 10 only stored illegal narcotics in your apartment once? 11 A. That I recall, yes. 12 Q. Okay. 13 MR. TEPFER: Did you say you wanted to take a lunch 14 at 1:00? It's 12:58. 15 MR. BAZAREK: Yeah. I'm gonna -- I'll -- Let me 16 finish -- see if I can finish up with this exhibit. 17 BY MR. BAZAREK: 18 Q. But, okay. All right. Looking at 19 Interrogatory Number 2, it's asking you about the -- 20 every geographic location where you engaged in such 21 activities, including, if known, the street address. Do 22 you see that, the last part of that question? 23 A. Yeah. 24 Q. Okay. And it's asking -- That question is</p>	<p style="text-align: right;">Page 117</p> <p>1 But go ahead. 2 BY THE WITNESS: 3 A. Yes. 4 Q. So why didn't you include 6215 South Rhodes in 5 this answer? 6 A. Because I was under the impression that we was 7 strictly talking about the time frame of the Watts case. 8 Q. Why didn't you include 6540 South Vernon in 9 this answer? 10 A. Because I assumed that we was strictly talking 11 about the Watts case, as evident with my answer, 12 527 East Browning. 13 Q. Why didn't you include the occasions where you 14 would bring the narcotics to Zachary Brown? 15 A. Because I assumed that we was strictly talking 16 about the Watts case. 17 Q. Take a look at Number 3. You were asked, 18 "With reference to the time frame described in 19 Interrogatory Number 2, have you ever engaged in 20 drug-related activity jointly with another person or 21 persons or on behalf of a group? If so, please" -- you 22 know, it asks you to identify individuals, group, 23 specific locations. And there's just an objection 24 there. Do you see that?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 118	Page 120
<p>1 A. Yes.</p> <p>2 Q. So why didn't you include information about 3 narcotics activity at Rhodes and Vernon that you engaged 4 in?</p> <p>5 MR. TEPFER: To the extent this -- If you can 6 answer the question without violating privilege, 7 attorney-client or work product privilege, then I guess 8 you can answer that question.</p> <p>9 BY THE WITNESS:</p> <p>10 A. I don't see an answer.</p> <p>11 Q. Right.</p> <p>12 THE REPORTER: I'm sorry. "I don't see an answer"?</p> <p>13 THE WITNESS: Yes.</p> <p>14 BY MR. BAZAREK:</p> <p>15 Q. You agree that you didn't include on there -- 16 there's no answer to Bolton that you engaged in 17 narcotics activity on Rhodes and Vernon, right?</p> <p>18 A. Because I thought we was talking about the 19 Watts time frame.</p> <p>20 Q. So that's why you didn't answer that question?</p> <p>21 MR. TEPFER: Objection: work product privilege on 22 why he didn't answer that question.</p> <p>23 Do not answer that question.</p> <p>24</p>	<p>1 A. I don't know.</p> <p>2 Q. Well, the other answers, you said it was 3 because, "Ah, I thought it was Watts related."</p> <p>4 A. Yeah. Because this question was framed 5 differently. So I -- What I was doing, I smoked 6 marijuana.</p> <p>7 Q. Right. But you were also dealing drugs?</p> <p>8 MR. TEPFER: Objection: mischaracterizes the prior 9 testimony, form of the question. It's argumentative.</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q. Right?</p> <p>12 A. Yes.</p> <p>13 Q. And this, it's not asking you about the 2000s, 14 the late '90s when you're selling narcotics. It's 15 saying "Please state the last year during which you 16 engaged directly or indirectly in any drug-related 17 activity." Right?</p> <p>18 A. Yes.</p> <p>19 MR. TEPFER: Objection to form.</p> <p>20 Go ahead.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. And at the time, that was the same year that 23 you signed in answer to these -- Strike that.</p> <p>24 That was the same year, 2017, you were engaged</p>
Page 119	Page 121
<p>1 BY MR. BAZAREK:</p> <p>2 Q. Are you going to follow your attorney's advice 3 and not answer that question?</p> <p>4 A. Yes.</p> <p>5 Q. Could you answer that question but for your 6 attorney telling you not to answer the question?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Let's take a look at Number 4.</p> <p>9 Question: "Please state the last year during which you 10 engaged directly or indirectly in any drug-related 11 activity." Did I read that right?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And you gave an answer to that 14 question, right?</p> <p>15 A. Yes.</p> <p>16 Q. And there's an objection made by an attorney. 17 And you answer. The only answer you give is "Plaintiff 18 used marijuana in 2017." Do you see that?</p> <p>19 A. Yeah.</p> <p>20 Q. Okay. That's not related to Watts?</p> <p>21 A. Right.</p> <p>22 Q. So why didn't -- Why in answer to Number 4 did 23 you not include the narcotics transactions that you were 24 engaging in during 2017?</p>	<p>1 in narcotics activity?</p> <p>2 MR. TEPFER: Objection: form.</p> <p>3 BY THE WITNESS:</p> <p>4 A. Yes.</p> <p>5 Q. Why did you leave it out?</p> <p>6 A. Because it wasn't --</p> <p>7 MR. TEPFER: Asked and answered.</p> <p>8 Go ahead.</p> <p>9 BY THE WITNESS:</p> <p>10 A. It wasn't framed like that, like, to me.</p> <p>11 Q. What don't you understand about that question?</p> <p>12 MR. TEPFER: Objection: mischaracterizes the 13 testimony. It's also 1:05 now.</p> <p>14 BY THE WITNESS:</p> <p>15 A. It just wasn't framed to me like that.</p> <p>16 Q. Mr. Baker, during 2017, you were a drug 17 dealer, correct?</p> <p>18 MR. TEPFER: Objection: mischaracterizes the prior 19 testimony.</p> <p>20 BY THE WITNESS:</p> <p>21 A. When you say "drug dealer," I figure I would 22 have to be getting currency directly for me. And I 23 passed along drugs.</p> <p>24 Q. Would you --</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 122	Page 124
<p>1 A. I didn't receive any payment, any currency 2 that went into my pocket for drugs. But you keep 3 calling me a drug dealer. I passed along drugs, yes. 4 But I never received currency.</p> <p>5 Q. That's drug-related activity that you're 6 engaged in, right?</p> <p>7 MR. TEPFER: Objection: argumentative.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Yeah.</p> <p>10 Q. Yes?</p> <p>11 A. If you put it like that, yes.</p> <p>12 Q. In 2017 you were engaging in narcotics-related 13 activity with Bali, right?</p> <p>14 A. Yes.</p> <p>15 Q. And were you engaging in narcotics-related 16 activity with Zachary Brown?</p> <p>17 A. Yes.</p> <p>18 Q. And were you engaging in narcotics-related 19 activity with Fay?</p> <p>20 A. Well, I wouldn't call it narcotics --</p> <p>21 Q. When you're passing her --</p> <p>22 A. -- transactions with Fay.</p> <p>23 Q. When you're passing her heroin on two 24 occasions, you don't consider that narcotics-related</p>	<p>1 Q. So why didn't you include that, the -- all 2 that narcotics-related activity in answer to Number 4?</p> <p>3 MR. TEPFER: Objection: asked and answered 4 multiple times.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Because I didn't think -- I didn't think to do 7 it. I didn't think it was relevant to that.</p> <p>8 MR. TEPFER: All right. I'm going to take -- I'm 9 going to go on a lunch break. I warned that I wanted -- 10 Are you --</p> <p>11 MR. BAZAREK: Let me just --</p> <p>12 MR. TEPFER: If you have one or two more questions. 13 But --</p> <p>14 MR. BAZAREK: Yeah, yeah. I think I'm almost done 15 with this exhibit.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. Let's take a look, Mr. Baker, at -- Let's look 18 at your -- Strike that.</p> <p>19 You know, I just have -- Yeah, I do have a 20 question about Number 9. This question, Number 9, is 21 asking you about the last date on which you were 22 involved directly or indirectly in drug-related 23 activities at Ida B. Wells, right?</p> <p>24 MR. TEPFER: Objection: mischaracterizes the</p>
<p style="text-align: center;">Page 123</p> <p>1 activity?</p> <p>2 MR. TEPFER: Hold on. Objection. Please let him 3 finish answers. And that's argumentative.</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. Go ahead.</p> <p>6 A. Because there was no money -- no moneys 7 transferred --</p> <p>8 Q. Okay.</p> <p>9 A. -- with me and Fay.</p> <p>10 Q. You were also engaging in narcotics-related 11 activity with Jamar Lewis, right?</p> <p>12 MR. TEPFER: Objection: It's argumentative. I'm 13 going to ask for a break pretty soon, so if you want to 14 finish along this.</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. Go ahead.</p> <p>17 A. I have gotten -- I would get the drugs from 18 him and pass them to the people that was asking for it.</p> <p>19 Q. Right. That's narcotics-related activity, 20 right?</p> <p>21 MR. TEPFER: Objection: asked and answered, form, 22 argumentative.</p> <p>23 BY THE WITNESS:</p> <p>24 A. Right.</p>	<p style="text-align: center;">Page 125</p> <p>1 question --</p> <p>2 BY MR. BAZAREK:</p> <p>3 Q. You know what? I'll read the question. I'll 4 read it. I want to make sure you -- Do you need to 5 clarify any answer that you've given so far in this 6 deposition?</p> <p>7 A. It says "Plaintiff objects to this 8 interrogatory on the basis that it is not relevant, 9 overly broad, and not proportional to the needs of the 10 case."</p> <p>11 Q. No.</p> <p>12 A. "Subject to and without waiving these 13 objections, 2005."</p> <p>14 Q. Okay. So let me just get the question out 15 because your counsel said it was -- my question was 16 confusing.</p> <p>17 You were asked in Interrogatory Number 9 "Did 18 you engage at any time in any drug-related activities in 19 the 527 building of the Ida B. Wells housing project? 20 If your answer is yes, what was the last date on which 21 you were involved directly or indirectly in such 22 activity?" Do you see that?</p> <p>23 A. Yes.</p> <p>24 Q. Did I read it correctly?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 126</p> <p>1 A. Yes.</p> <p>2 Q. And so your answer to that question was 2005, correct?</p> <p>3 A. Yes, that's what it says here.</p> <p>4 Q. And was that truthful?</p> <p>5 A. Well, I look at marijuana as illegal drugs at that time.</p> <p>6 Q. What about heroin or cocaine?</p> <p>7 A. Those are illegal, too.</p> <p>8 Q. Right. And you were engaging in illegal narcotics activity with cocaine and heroin in 2005, right?</p> <p>9 A. I don't think so. I don't recall that.</p> <p>10 Q. What's the drug-related activities you're referring to that occurred during 2005?</p> <p>11 A. Marijuana. Smoking marijuana.</p> <p>12 Q. Anything else?</p> <p>13 A. That's all I smoked.</p> <p>14 Q. Any other illegal activity in 2005 that you engaged in?</p> <p>15 A. Not that I recall.</p> <p>16 Q. And I'm sorry. Be more specific. Any drug -- Did you engage in any drug-related activities in the 527 building involving heroin during 2005?</p>	<p style="text-align: center;">Page 128</p> <p>1 MR. TEPFER: Yeah. He announced --</p> <p>2 MR. PALLE: Sorry. Okay. I apologize, Bill.</p> <p>3 MR. BAZAREK: Were -- Do you want -- Let's read the question back.</p> <p>4 (Record read as requested.)</p> <p>5 BY MR. BAZAREK:</p> <p>6 Q. Oh. During the time -- Strike that.</p> <p>7 During the times when you were selling narcotics during 2017 and 2018, did you have more than one phone?</p> <p>8 MR. TEPFER: Objection to the characterization, and the question mischaracterizes the testimony.</p> <p>9 Go ahead.</p> <p>10 BY THE WITNESS:</p> <p>11 A. Not that I recall. I believe I only had one phone.</p> <p>12 Q. Okay. And what was the phone number for that phone?</p> <p>13 A. I don't know.</p> <p>14 Q. Do you still have that same phone number?</p> <p>15 A. No.</p> <p>16 Q. Okay. Who was your carrier back in 2017 and 2018?</p> <p>17 A. I don't know. Probably either Boost or</p>
<p style="text-align: center;">Page 127</p> <p>1 A. Not that I recall.</p> <p>2 Q. How about cocaine?</p> <p>3 A. Not that I recall.</p> <p>4 Q. But you do recall the marijuana?</p> <p>5 A. I know I've been smoking marijuana forever, since 19- -- what? -- '97, '98.</p> <p>6 Q. Okay. Do you still smoke it?</p> <p>7 A. No. I can't smoke it now because I drive trucks.</p> <p>8 MR. BAZAREK: Okay. All right. Let's take a break for lunch.</p> <p>9 THE VIDEOGRAPHER: The time is 1:11 p.m. We are now off the record.</p> <p>10 (A short break was had.)</p> <p>11 THE VIDEOGRAPHER: The time is 1:52 p.m. We are now back on the record.</p> <p>12 MR. TEPFER: Go ahead.</p> <p>13 BY MR. BAZAREK:</p> <p>14 Q. Mr. Baker, do you know what a burner phone is?</p> <p>15 A. A burner phone?</p> <p>16 Q. Yes.</p> <p>17 A. I guess it's just another phone.</p> <p>18 Q. During the times --</p> <p>19 MR. PALLE: Excuse me. Are we back on the record?</p>	<p style="text-align: center;">Page 129</p> <p>1 T-Mobile. I'm not sure.</p> <p>2 Q. Did the federal -- The federal authorities who arrested you were from DEA?</p> <p>3 A. I don't know. I turned myself in to the federal building. So I don't know.</p> <p>4 Q. So it's your -- Strike that.</p> <p>5 Were you -- You were provided with evidence by the federal government in relation to the federal prosecution against you?</p> <p>6 A. Did I receive something from the federal government?</p> <p>7 Q. Yes.</p> <p>8 A. Like they gave it to me in my hand?</p> <p>9 Q. Or your attorney.</p> <p>10 A. Well, I did get some paperwork from my attorney.</p> <p>11 Q. Yeah. Did the -- And you talked about audiotapes that you had access to. Do you recall that earlier in the deposition?</p> <p>12 A. Yeah. I think they're in the form of a disc.</p> <p>13 Q. Okay. Did they -- Strike that.</p> <p>14 Did the federal government supply to you any texts that you sent or received during the time when you were -- during -- at any time during 2017 or 2018?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 130	Page 132
<p>1 A. I don't know. I didn't even read the stuff. 2 I didn't even look at it. 3 Q. But would you agree that as part of the 4 narcotics activity that you were involved in in 2017 and 5 2018, you would text individuals? 6 A. I can't agree. I don't know. 7 Q. Well, when Bali would -- Did Bali ever text 8 you ever? 9 A. Not that I remember. I think Bali always 10 called. 11 Q. Okay. And what about Mr. Brown? Did he ever 12 text you? 13 A. I believe he called as well. 14 Q. Okay. And what about Fay? 15 A. I believe she called. 16 Q. Okay. So is it your testimony you received or 17 sent no texts related to the narcotics activity you 18 engaged in during 2017 and 2018? 19 MR. TEPFER: Objection: asked and answered and 20 mischaracterizes -- 21 BY THE WITNESS: 22 A. I don't recall. 23 MR. TEPFER: Go ahead. Sorry. 24</p>	<p>1 THE VIDEOGRAPHER: Can we stop for a moment? 2 MR. BAZAREK: Sure. 3 THE VIDEOGRAPHER: I'm not getting your mic. 4 MR. BAZAREK: Oh. 5 THE VIDEOGRAPHER: So I'm going to take us off the 6 record. The time is 1:57 p.m. We are now off the 7 record. 8 (A short break was had.) 9 THE VIDEOGRAPHER: The time is 2:00 p.m. We are 10 now back on the record. 11 BY MR. BAZAREK: 12 Q. Mr. Baker, during 2017 and 2018, did 13 Jamar Lewis engage in narcotics activity that wasn't 14 related to him supplying you with narcotics to sell? 15 MR. TEPFER: Objection: form, calls for 16 speculation. 17 But go ahead. 18 BY THE WITNESS: 19 A. Probably. 20 Q. And what's the source of your information for 21 your answer? 22 A. I mean, he served -- he gave it to me. So, I 23 mean, it's probable. 24 Q. Do you know who else he was --</p>
<p style="text-align: center;">Page 131</p> <p>1 BY MR. BAZAREK: 2 Q. During 2017 and 2018, did you text Jamar Lewis 3 regarding narcotics activity? 4 A. I don't know. 5 Q. Did Jamar Lewis text you regarding setting up 6 these narcotics transactions that you engaged in? 7 A. I don't know. 8 Q. Okay. Is it because you don't remember or you 9 don't know -- 10 A. Yeah. I don't remember. 11 Q. Okay. And that's -- Going back to my 12 question, I wanted to know if the federal government 13 provided you with any written texts that you had sent or 14 received. That's all. 15 A. I don't know. 16 Q. Okay. Who would know? 17 A. My lawyer. 18 Q. Who was your lawyer? 19 A. Molly Armour. 20 Q. Armour? 21 A. (Nodding head.) 22 Q. Is that yes? 23 A. Yes. 24 Q. Okay.</p>	<p style="text-align: center;">Page 133</p> <p>1 A. No. 2 Q. -- supplying drugs to? 3 Did you ever let him use any of your private 4 residences during 2017 and 2018 to mix illegal 5 narcotics? 6 A. Yes. 7 Q. Tell me about that. 8 A. I let him use it. 9 Q. What did you let him use? 10 A. The residence. 11 Q. Both Rhodes and Vernon? 12 A. I know Vernon. 13 Q. And what did he use your -- Strike that. 14 How did he use your residence to engage in 15 narcotics activity on Vernon? 16 A. He put it in bags. 17 Q. Would he store narcotics there as well? 18 A. No. 19 Q. Who would help him put the narcotics in bags? 20 A. Jamar. 21 Q. Your son? 22 A. Jamar. 23 Q. Okay. I'm sorry. Anyone -- Would -- Who -- 24 Would anyone -- He would just do it on his own?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 134	Page 136
<p>1 A. Yeah.</p> <p>2 Q. Would you help him?</p> <p>3 A. Jamar.</p> <p>4 Q. Would you help him?</p> <p>5 A. Jamar --</p> <p>6 Q. No. My question --</p> <p>7 A. -- would put it in there.</p> <p>8 Q. Would you help Jamar?</p> <p>9 A. I said Jamar would put it in there, sir.</p> <p>10 Q. Would you help Jamar do that?</p> <p>11 A. No.</p> <p>12 Q. Were you present when Jamar was putting the narcotics in bags at your residence on Vernon?</p> <p>13 A. I was before, yes.</p> <p>14 Q. Were any of your family members present when that was --</p> <p>15 A. No.</p> <p>16 Q. -- going on?</p> <p>17 A. No.</p> <p>18 Q. Okay. And then what would he -- what would Jamar do with the bags he was putting the narcotics into?</p> <p>19 A. He would leave with it.</p> <p>20 Q. To go sell it?</p>	<p>1 When Jamar was putting the narcotics in the bags in your apartment on Vernon, what were you doing?</p> <p>2 A. Playing a game, smoking marijuana.</p> <p>3 Q. Like video games-type thing?</p> <p>4 A. Yes. Madden.</p> <p>5 Q. How long of a time period was it where Jamar was putting the narcotics in the bags at your Vernon residence?</p> <p>6 A. I can't really say. Like, I don't know how long it took him to do it. I don't know.</p> <p>7 Q. What was the quantity he had?</p> <p>8 A. I don't know that either.</p> <p>9 Q. During 2017 or 2018, did you ever observe Jamar Lewis with a kilo of heroin?</p> <p>10 A. I can't say that I did. I don't know. I didn't actually -- I don't know if I actually seen him with a key of heron.</p> <p>11 Q. Did Jamar tell you who he was going to sell the heroin to?</p> <p>12 A. No.</p> <p>13 Q. Who did -- Where did Jamar get the heroin from?</p> <p>14 A. I wouldn't know.</p> <p>15 Q. Did he ever tell you?</p>
<p>1 A. I don't know what he --</p> <p>2 MR. TEPFER: Objection: calls for speculation.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. On how many occasions did this occur?</p> <p>5 A. I believe one.</p> <p>6 Q. How long was Jamar -- Or strike that.</p> <p>7 You said it was just on one occasion, correct?</p> <p>8 A. I believe it was once.</p> <p>9 Q. Do you remember what year that was?</p> <p>10 A. No.</p> <p>11 Q. Was it before you went on the cruise or after?</p> <p>12 A. After.</p> <p>13 When did the -- was the Super Bowl in Minnesota?</p> <p>14 Q. I'm going to -- I'd have to google that. Was it that day?</p> <p>15 A. No. It was that year.</p> <p>16 Q. Okay. And so when Jamar was putting the narcotics in the bag at your home on Rhodes, what were you doing?</p> <p>17 A. I didn't say on Rhodes.</p> <p>18 MR. TEPFER: Objection. Yeah.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. Oh, I'm sorry. I misspoke.</p>	<p>1 A. It wasn't my business.</p> <p>2 Q. Okay. So your answer is he never told you who his supplier was?</p> <p>3 A. Right.</p> <p>4 Q. Is that right?</p> <p>5 A. He never told me.</p> <p>6 Q. Okay. And you never heard him say who his supplier was?</p> <p>7 A. Never cared.</p> <p>8 Q. You never heard him say it, right?</p> <p>9 A. No. I don't recall hearing him say it. Like, he wouldn't have a reason to tell me, that I know of.</p> <p>10 Q. Let's take a look at Deposition Exhibit Number 3. Those are your answers to Defendant Watts's interrogatories. Just give me a moment.</p> <p>11 In Interrogatory Number 6, you were asked to identify any and all sources of income since your release from custody of the Illinois Department of Corrections; is that correct?</p> <p>12 A. That's what it says here.</p> <p>13 Q. And I'm paraphrasing it. But that's -- You understand the time frame, right?</p> <p>14 A. That's the -- Yeah. That's what it's saying here.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 138	Page 140
<p>1 Q. Okay. And you agree in answer to 2 Interrogatory Number 6, you provided no information 3 concerning any moneys that you would have received from 4 Bali or Zachary Brown, correct?</p> <p>5 MR. TEPFER: Objection: That clearly 6 mischaracterizes the prior testimony. But, okay.</p> <p>7 BY THE WITNESS:</p> <p>8 A. Correct, because it wasn't my money to keep. 9 I didn't keep the money.</p> <p>10 Q. When you would get the money from Bali or 11 Zachary Brown for the drugs you sold them, would you 12 give it back to Jamar Lewis the very same day?</p> <p>13 A. Yes. The drugs that I got from Jamar to pass 14 along to Bali and Zach, yes, I would get the money from 15 them and give it to Jamar.</p> <p>16 Q. Would you give the money to Jamar the same day 17 that you sold the narcotics?</p> <p>18 MR. TEPFER: Objection to the form of the question.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I believe so.</p> <p>21 Q. So how -- So would Jamar come back to you, or 22 would you go to him to give him the money? How did that 23 work?</p> <p>24 A. Wherever I would see him at that day, I would</p>	<p>1 Q. On the day that Jamar was packaging the 2 narcotics inside your residence on Rhodes, did you give 3 Jamar any money that day?</p> <p>4 A. I don't know.</p> <p>5 Q. Did Jamar give you any of the narcotics that 6 he was packaging to sell to anyone?</p> <p>7 A. No.</p> <p>8 Q. Okay. And going back to Exhibit 3, the 9 interrogatory answers, take a look at the last page. 10 And you signed that, sir, right? That's your signature?</p> <p>11 A. Yes.</p> <p>12 Q. And you signed it on September 7, 2017; is 13 that right?</p> <p>14 A. Yes.</p> <p>15 Q. And can you just read the verification into 16 the record?</p> <p>17 A. "I, Ben Baker, verify that I have reviewed the 18 attached Plaintiff Ben Baker's responses to Defendant 19 Watts' interrogatories, and I certify that the answers 20 are true and correct to the best of my knowledge, 21 information, and memory."</p> <p>22 Q. And you read those interrogatories over before 23 you signed them; is that right?</p> <p>24 A. Maybe.</p>
<p style="text-align: center;">Page 139</p> <p>1 give him the money. So he might come to my house, or I 2 might see him outside. And I would give him the money.</p> <p>3 Q. Okay. Did you ever give Jamar Lewis money 4 from the narcotics sale at your apartment on Vernon?</p> <p>5 MR. TEPFER: Objection to the form of the question. 6 And I'm not sure I understand the question.</p> <p>7 BY THE WITNESS:</p> <p>8 A. From the -- The money that I received from 9 giving the drugs to Bali and getting the money, I would 10 pass it back to Jamar.</p> <p>11 Q. Right. Did you ever do that --</p> <p>12 A. So I would pass the -- Jamar would pass me the 13 drugs; I would pass it to Bali or Zachary, get the 14 money.</p> <p>15 Q. Right.</p> <p>16 A. And then when I seen Jamar later on that day, 17 I would give him the money back.</p> <p>18 Q. Okay. So it was always on that -- the same 19 day you received the money, you would have given it to 20 Jamar. Is that your testimony?</p> <p>21 MR. TEPFER: Objection: asked and answered.</p> <p>22 BY THE WITNESS:</p> <p>23 A. Majority of the time, it went like that. I 24 believe I would give it back to him the same day.</p>	<p style="text-align: center;">Page 141</p> <p>1 Q. Okay. Mr. Baker, have you ever paid a law 2 enforcement officer a bribe?</p> <p>3 A. No.</p> <p>4 Q. Have you ever told anyone that you paid a law 5 enforcement officer a bribe?</p> <p>6 A. No.</p> <p>7 Q. Have you ever observed anyone pay a law 8 enforcement officer a bribe?</p> <p>9 A. Did I see it with my eyes? No.</p> <p>10 Q. Separate and apart from your arrests that 11 you're claiming were unlawful, have you ever observed a 12 police officer plant narcotics on anyone?</p> <p>13 A. Yes.</p> <p>14 Q. When?</p> <p>15 A. A lot of times in the buildings. I've 16 witnessed them take drugs and sell them theirself. I've 17 witnessed a lot of things with your clients.</p> <p>18 Q. Who -- What clients are you referring to?</p> <p>19 A. Watts --</p> <p>20 Q. I don't represent Watts.</p> <p>21 A. -- and his team.</p> <p>22 Q. Just so you know, I don't represent Watts.</p> <p>23 A. You say you representing the team --</p> <p>24 Q. I represent --</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 142</p> <p>1 A. -- members. Yeah.</p> <p>2 Q. Right. Tell me, other than Watts, who are you</p> <p>3 referring to?</p> <p>4 A. I'm referring to AJ.</p> <p>5 Q. Who else?</p> <p>6 A. Nichols, he put it on me.</p> <p>7 Q. I said other than your -- Sir, I said other</p> <p>8 than -- I know you're making claims that you were</p> <p>9 unlawfully arrested. I'm asking about other arrests</p> <p>10 that you observed any law enforcement officer where he</p> <p>11 planted drugs on a person.</p> <p>12 A. Yeah, that's about it. AJ and Watts.</p> <p>13 Q. Anyone else?</p> <p>14 A. Guilt by association.</p> <p>15 Q. What does that mean?</p> <p>16 A. His whole team was dirty. So the apple don't</p> <p>17 fall far from the tree. If he was doing it, they was</p> <p>18 doing it.</p> <p>19 Q. Okay. I'm asking you what you observed.</p> <p>20 A. I'm telling you. I'm answering your question.</p> <p>21 Q. All right. So you said AJ and Watts you</p> <p>22 observed plant narcotics on someone other than yourself</p> <p>23 or your wife, Clarissa Glenn, correct?</p> <p>24 A. Yeah.</p>	<p style="text-align: center;">Page 144</p> <p>1 Q. Have you ever sold drugs?</p> <p>2 A. Yes, I have.</p> <p>3 Q. You've sold heroin, right?</p> <p>4 MR. TEPFER: Objection: asked and answered.</p> <p>5 BY MR. BAZAREK:</p> <p>6 Q. Right?</p> <p>7 A. I have.</p> <p>8 Q. For years, you sold heroin, right?</p> <p>9 MR. TEPFER: Objection: asked and answered.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I have.</p> <p>12 Q. Right. In your interrogatory answers, you</p> <p>13 said you were selling heroin from 1998 through 2004,</p> <p>14 right?</p> <p>15 MR. TEPFER: Objection: misstates the testimony,</p> <p>16 record, asked and answered.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I did.</p> <p>19 Q. And so you received income for that, right?</p> <p>20 A. Income?</p> <p>21 Q. Money.</p> <p>22 A. Yeah.</p> <p>23 Q. So you -- When you hear the phrase "income,"</p> <p>24 you think, oh, that's something you have to pay taxes</p>
<p style="text-align: center;">Page 143</p> <p>1 Q. Who?</p> <p>2 A. Different people.</p> <p>3 Q. Who?</p> <p>4 A. I don't know.</p> <p>5 Q. Can you tell me one person at this deposition</p> <p>6 that you say Alvin Jones or Watts planted narcotics on?</p> <p>7 A. Bryant Patrick.</p> <p>8 Q. Is he a drug dealer?</p> <p>9 A. I mean, he sold drugs.</p> <p>10 Q. Just like you, right?</p> <p>11 MR. TEPFER: Objection: argumentative.</p> <p>12 BY THE WITNESS:</p> <p>13 A. I don't sell drugs.</p> <p>14 MR. TEPFER: Asked and answered.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I don't sell drugs.</p> <p>17 Q. It's your testimony that you've never sold</p> <p>18 drugs, sir?</p> <p>19 A. I didn't say I never --</p> <p>20 MR. TEPFER: Objection: misstates the testimony,</p> <p>21 argumentative.</p> <p>22 BY MR. BAZAREK:</p> <p>23 Q. Go ahead.</p> <p>24 A. I don't sell drugs.</p>	<p style="text-align: center;">Page 145</p> <p>1 on; is that right?</p> <p>2 A. Yeah.</p> <p>3 Q. So in your mind, the money that you made</p> <p>4 selling narcotics was not income, correct?</p> <p>5 A. Not legal income, no. I couldn't report it.</p> <p>6 I couldn't go and buy something with it like property or</p> <p>7 something like that because the police or the federal</p> <p>8 bureau, somebody, when they -- they would take it. So I</p> <p>9 couldn't claim it.</p> <p>10 Q. When did you --</p> <p>11 A. Am I right?</p> <p>12 Q. When did you observe --</p> <p>13 A. Am -- I can't ask you questions?</p> <p>14 MR. TEPFER: You don't get to ask him questions.</p> <p>15 THE WITNESS: Oh, okay.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. When did you observe narcotics being planted</p> <p>18 on Bryant Patrick?</p> <p>19 A. In 527.</p> <p>20 Q. What year?</p> <p>21 A. I don't recall the year.</p> <p>22 Q. Describe the circumstances of what you</p> <p>23 observed.</p> <p>24 A. They had us in the hallway, and he would say,</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 146	Page 148
<p>1 "Who claiming these drugs?"</p> <p>2 Q. Who would say that?</p> <p>3 A. Watts. Sergeant Watts. "Who claiming these</p> <p>4 drugs?" Nobody will say nothing. "Okay. Well, I'm</p> <p>5 taking you, you, you." And that's how he operated.</p> <p>6 Q. Okay. I'm talking specifically about</p> <p>7 Bryant Patrick.</p> <p>8 A. That was one of the times.</p> <p>9 Q. Was it before your July '04 arrest or after?</p> <p>10 A. Before, I believe.</p> <p>11 Q. Do you remember what year?</p> <p>12 A. No, sir, I do not.</p> <p>13 Q. Okay. Did Alvin Jones say anything on that</p> <p>14 day?</p> <p>15 A. Alvin Jones always say something.</p> <p>16 Q. No. I'm asking on the day that you're talking</p> <p>17 about, did Alvin Jones say anything?</p> <p>18 A. Alvin Jones always said something.</p> <p>19 Q. Sir, you've testified that narcotics were</p> <p>20 planted on Bryant Patrick prior to July of 2004,</p> <p>21 correct?</p> <p>22 A. I believe so. I can't say the exact date.</p> <p>23 But I believe so.</p> <p>24 Q. Okay. My question was prior to your arrest in</p>	<p>1 Q. -- had narcotics planted on him.</p> <p>2 MR. TEPFER: All right. Just -- We have to --</p> <p>3 can't talk over each other for the court reporter. Let</p> <p>4 him finish the question, give me time if I have an</p> <p>5 objection, and then you can answer the question.</p> <p>6 BY THE WITNESS:</p> <p>7 A. Oh, I can answer now?</p> <p>8 Q. Yes.</p> <p>9 A. One word he said was "Fuck you."</p> <p>10 Q. Did he say anything else on that day?</p> <p>11 A. I don't know.</p> <p>12 Q. As you sit at this deposition, the only thing</p> <p>13 you recall Alvin Jones saying on that day was "Fuck</p> <p>14 you"?</p> <p>15 A. You asked me to give you one word. I gave you</p> <p>16 that word.</p> <p>17 Q. Can you tell me anything else other than</p> <p>18 Alvin Jones said "Fuck you" on that day?</p> <p>19 A. "You're going to jail."</p> <p>20 Q. Anything else?</p> <p>21 A. I don't know, sir. I can't recite it</p> <p>22 verbatim.</p> <p>23 Q. All right. As you sit at this deposition, you</p> <p>24 don't recall anything else that was said, correct?</p>
Page 147	Page 149
<p>1 July of '04. I didn't ask -- I didn't say a specific</p> <p>2 day. It was prior to that time, right?</p> <p>3 A. Your question was did Alvin Jones say anything</p> <p>4 that day.</p> <p>5 Q. Well, let's -- I want to get some -- Okay. So</p> <p>6 you -- Did he say anything that day? Yeah.</p> <p>7 A. He always said something every day --</p> <p>8 Q. What did he say?</p> <p>9 A. -- he come in the building, whether it's a</p> <p>10 threat or whatever it is.</p> <p>11 Q. What did -- What did --</p> <p>12 A. I can't --</p> <p>13 Q. What did --</p> <p>14 A. I can't recite verbatim --</p> <p>15 Q. Tell me --</p> <p>16 A. -- what Alvin Jones said.</p> <p>17 Q. Tell me one word that Alvin Jones said --</p> <p>18 A. "Fuck you."</p> <p>19 Q. -- on the day --</p> <p>20 A. That's what he said.</p> <p>21 Q. -- on the day --</p> <p>22 A. "Fuck you."</p> <p>23 Q. -- that Bryant Patrick --</p> <p>24 A. That's one word he said.</p>	<p>1 MR. TEPFER: Mischaracterizes the testimony.</p> <p>2 Objection.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I don't recall.</p> <p>5 Q. Would anything help you recall?</p> <p>6 A. Yeah. If you could play back what he said.</p> <p>7 Q. Is Bryant Patrick -- Strike that.</p> <p>8 Was Bryant Patrick a Gangster Disciple?</p> <p>9 A. I don't know.</p> <p>10 Q. Was he in the same gang that you were in?</p> <p>11 A. I don't know.</p> <p>12 Q. Where did Bryant Patrick live?</p> <p>13 A. He lived in 527.</p> <p>14 Q. That's the building where you sold narcotics</p> <p>15 out of, right?</p> <p>16 A. Yes, I used to sell drugs out of that</p> <p>17 building.</p> <p>18 Q. Did Bryant Patrick sell drugs out of that</p> <p>19 building?</p> <p>20 A. He has.</p> <p>21 Q. Did Bryant Patrick sell drugs for you?</p> <p>22 A. He has.</p> <p>23 Q. What drugs did Bryant Patrick sell for you?</p> <p>24 A. Heroin.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 150	Page 152
<p>1 Q. What would you pay Bryant Patrick to -- Strike 2 that. 3 How would you pay -- Strike that. 4 Would you pay Bryant Patrick money to sell 5 drugs for you? 6 A. Yes, I have. 7 Q. What did you pay him? 8 A. Money. 9 Q. Did you pay him weekly? daily? 10 A. Daily. 11 Q. Okay. How many people were on your payroll 12 when you were selling drugs out of the 527 building? 13 A. Not sure, because I had, well, Bryant. So I'm 14 not sure how many people. 15 Q. Who sold drugs for you at Ida B. Wells other 16 than Bryant Patrick? 17 A. Elgen Moore. 18 Q. Who else? 19 A. That was basically it. Like ... 20 Q. Did you engage in hand-to-hand transactions at 21 Ida B. Wells? 22 A. I have. 23 Q. And where in Ida B. Wells would you engage in 24 your own hand-to-hand transactions?</p>	<p>1 drugs out of the apartment before, out of my apartment. 2 Q. Okay. And that was Apartment 206? 3 A. Yeah. 4 Q. And so how would someone go buy narcotics from 5 you out of the 206 apartment? 6 A. If I wasn't -- If I wasn't downstairs or in 7 the hallway, they would call my name, and I would come 8 out. 9 Q. What do you mean they'd call your name? 10 A. They would say my name in the hallway or they 11 would knock on the door. 12 Q. And then sometimes Clarissa would answer the 13 door or the kids? 14 A. If Clarissa answered the door, she would say, 15 "Ben, somebody at the door for you," because they would 16 say, "Is Ben here?" 17 Q. And then what would you do? 18 A. I would go outside and see what they wanted. 19 Q. All right. So you would take the narcotics 20 that were stored in the apartment that you lived in with 21 your -- 22 A. No, sir. 23 Q. -- with Clarissa and your son -- sons, right? 24 No?</p>
<p style="text-align: center;">Page 151</p> <p>1 A. In the hallway. 2 Q. Like, any floor or a particular floor? 3 A. Yeah. Sometimes we'd be on the first floor. 4 Sometimes we'd be on the second floor. 5 Q. Would you ever engage in hand-to-hand 6 narcotics transactions in some of the vacant apartment 7 buildings? 8 A. The vacant apartment buildings? 9 Q. Yeah. 10 A. None of the buildings was vacant. 11 Q. Okay. Would you ever engage in narcotics 12 transactions at Ida B. Wells while inside an apartment 13 there? 14 A. A vacant -- No. 15 Q. I'm not talking about vacant. I'm talking 16 about where people were living. 17 A. Not that I recall, no. 18 Q. Okay. So all the narcotics transactions you 19 would have engaged in would be on one of the floors 20 inside the 527 building? 21 MR. TEPFER: Objection to the form. 22 But go ahead. 23 BY THE WITNESS: 24 A. No, because I have -- I have, like, passed</p>	<p style="text-align: center;">Page 153</p> <p>1 A. No. I told you, I stored drugs in there 2 before, but not then. 3 Q. So where would you -- where would you get the 4 drugs from? 5 A. I told you, I had the codes to the vacant 6 doors, the vacant apartments. They had these steel 7 doors on them. So I had the codes to those doors. 8 Q. How would you get the codes? 9 A. From being around. Somebody would get the 10 code, and then they'll tell you, "It's vacant up here. 11 The code is this." 12 Q. But if you're storing narcotics in there, how 13 would -- wouldn't you be worried about someone stealing 14 your narcotics? 15 A. No. 16 Q. Did -- Was any of your narcotics ever stolen 17 that you stored at Ida B. Wells? 18 A. Not that I recall. Not from me, no. 19 Q. Okay. Other than Bryant Patrick and 20 Elgen Moore, did you ever see Alvin Jones or Watts plant 21 drugs on anyone? 22 A. I don't know. I can't -- No. 23 Q. Ready to talk about the mailbox case? 24 A. Are you ready to talk about the mailbox case?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 154	Page 156
<p>1 Q. Were you on probation in 2004?</p> <p>2 A. Yes.</p> <p>3 Q. Or maybe I'm mixing it up.</p> <p>4 Were you on parole in 2004?</p> <p>5 A. No. I was on probation, gang intensified</p> <p>6 probation.</p> <p>7 Q. And what led you to being on -- Strike that.</p> <p>8 What led you to being on probation in 2004?</p> <p>9 A. A drug case.</p> <p>10 Q. And what was the drug case?</p> <p>11 A. Distribution.</p> <p>12 Q. Where were you -- Right. Do you remember what</p> <p>13 year or month you were arrested and --</p> <p>14 A. No.</p> <p>15 Q. Who arrested you for that arrest?</p> <p>16 A. I don't recall who arrested me for that</p> <p>17 arrest.</p> <p>18 Q. How did you get caught?</p> <p>19 A. But I know when I went to -- They took me to</p> <p>20 the police station. Well, they took me to the</p> <p>21 substation on -- in the Robert Taylor Homes.</p> <p>22 MR. TEPFER: I'm sorry. What did you call it? I</p> <p>23 didn't hear you.</p> <p>24 THE WITNESS: The substation.</p>	<p>1 seeing him. But he didn't, like, come in. I just seen</p> <p>2 him downstairs after they took me out of there.</p> <p>3 Q. What -- Did you see any members of Watts's</p> <p>4 team?</p> <p>5 A. No. They wasn't there yet.</p> <p>6 Q. Okay.</p> <p>7 A. Or they wasn't assigned over there yet, I</p> <p>8 guess.</p> <p>9 Q. So the -- Strike that.</p> <p>10 What was -- What were -- Strike that.</p> <p>11 What were the terms of your probation?</p> <p>12 A. Well, I had a curfew, and I was on house</p> <p>13 arrest.</p> <p>14 Q. And what does that mean?</p> <p>15 A. I had to be in the house by a certain time.</p> <p>16 Like, I think it was 7:00 to 7:00.</p> <p>17 Q. And were you also not to engage in criminal</p> <p>18 activity?</p> <p>19 A. I mean, you're on probation. I guess so.</p> <p>20 Q. And while you were on that probation, you were</p> <p>21 not to possess illegal narcotics; is that right?</p> <p>22 A. Correct.</p> <p>23 Q. How about firearms? Have you ever carried a</p> <p>24 firearm?</p>
<p style="text-align: center;">Page 155</p> <p>1 MR. TEPFER: Substation. Sorry.</p> <p>2 THE WITNESS: Yeah. They had those in the</p> <p>3 projects. Like, they would take you there before</p> <p>4 actually taking you to the police station. So I was</p> <p>5 there. And they was like, "Okay. We writing it up</p> <p>6 as" -- Well, the -- the substation, and then they took</p> <p>7 me to 51st Street.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. How did you get caught?</p> <p>10 MR. TEPFER: Objection to the form.</p> <p>11 BY THE WITNESS:</p> <p>12 A. What you mean caught? They grabbed me.</p> <p>13 Q. You were arrested?</p> <p>14 A. Yes, I was arrested. You said -- I was</p> <p>15 arrested and taken to the police station, to the</p> <p>16 substation.</p> <p>17 Q. But that was not an arrest by Ronald Watts's</p> <p>18 team, correct?</p> <p>19 A. Right.</p> <p>20 Q. Different set of officers?</p> <p>21 A. Yeah.</p> <p>22 Q. Do you remember --</p> <p>23 A. But Ronald Watts was out there that night,</p> <p>24 though. That was my actually first time, I believe,</p>	<p style="text-align: center;">Page 157</p> <p>1 A. Yes, I've carried firearms before.</p> <p>2 Q. Why?</p> <p>3 A. Protection, I guess.</p> <p>4 Q. Have you ever shot anyone?</p> <p>5 A. I've shot at people. I don't know if I</p> <p>6 actually shot someone. I've never been charged with</p> <p>7 shooting someone.</p> <p>8 Q. Were you ever convicted of attempted murder?</p> <p>9 A. Yes, I was. That was bull, too.</p> <p>10 Q. And were -- Did you have a firearm with you?</p> <p>11 A. No.</p> <p>12 Q. Was there some type of instrument that you had</p> <p>13 that --</p> <p>14 A. I --</p> <p>15 Q. -- you were being charged with attempted</p> <p>16 murder?</p> <p>17 A. I didn't have nothing. They didn't give me a</p> <p>18 gunshot residue test or nothing. Just the lady jumped</p> <p>19 out the car and said, "He did it," and that was that. I</p> <p>20 said, "No, I didn't, lady. I don't even know you." But</p> <p>21 I wound up going to -- Well, I was going to trial for</p> <p>22 it. And then the guy came in with a nurse and stuff,</p> <p>23 and it just didn't look good. He saying I did it, but I</p> <p>24 never even knew the dude.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 158	Page 160
<p>1 Q. Who --</p> <p>2 A. So I took the plea deal.</p> <p>3 Q. Who was the -- Who was the guy?</p> <p>4 A. I don't even remember his name.</p> <p>5 Q. Was he in the Gangster Disciples?</p> <p>6 A. I don't know. I didn't know the guy is what</p> <p>7 I'm telling you.</p> <p>8 Q. So it was just, like, case of mistaken</p> <p>9 identity?</p> <p>10 A. Yeah.</p> <p>11 Q. But you still pled guilty to that?</p> <p>12 A. Yeah, because he was coming to court to say I</p> <p>13 did it. I believe the lady did it. But that's just me.</p> <p>14 Q. So is it your testimony that you pled guilty</p> <p>15 to attempted murder even though you were innocent?</p> <p>16 A. Yes.</p> <p>17 Q. All right. So let me take you to June</p> <p>18 of 2004. You're on probation, right?</p> <p>19 A. Yes.</p> <p>20 Q. You are a drug dealer at Ida B. Wells, right?</p> <p>21 MR. TEPFER: Objection to form.</p> <p>22 Go ahead.</p> <p>23 BY MR. BAZAREK:</p> <p>24 Q. Right?</p>	<p>1 A. I remember going to community service.</p> <p>2 Q. How did you get there?</p> <p>3 A. Clarissa had drove me to community service.</p> <p>4 Q. What kind of car did you have in 2004?</p> <p>5 A. I believe we had a Dodge Intrepid.</p> <p>6 Q. Did you know anyone with a blue Chevrolet?</p> <p>7 A. A blue Chevrolet, no.</p> <p>8 Q. Yeah. What color was --</p> <p>9 A. Well, Jamar had a blue Lumina.</p> <p>10 Q. Is that -- That's a Chevy?</p> <p>11 A. Yeah.</p> <p>12 Q. Blue Chevy?</p> <p>13 A. Yeah.</p> <p>14 Q. Okay. And you'd been in that car before, that</p> <p>15 blue Chevy?</p> <p>16 A. Yes, I've been in it before.</p> <p>17 Q. Okay. And then did Clarissa have to work that</p> <p>18 day?</p> <p>19 A. Yes.</p> <p>20 Q. Where was she working on that day?</p> <p>21 A. I believe she was working at Michael Reese</p> <p>22 Hospital doing the -- her auntie was involved some type</p> <p>23 of way with a help-at-home service.</p> <p>24 Q. And what were her hours?</p>
<p style="text-align: center;">Page 159</p> <p>1 A. I sold drugs.</p> <p>2 Q. Right. During 2004, you sold illegal</p> <p>3 narcotics out of Ida B. Wells, right?</p> <p>4 MR. TEPFER: It's been asked and answered.</p> <p>5 BY THE WITNESS:</p> <p>6 A. Yes.</p> <p>7 Q. Okay. June 14, 2004, do you remember that</p> <p>8 day?</p> <p>9 A. No.</p> <p>10 Q. What -- Is there a day that you -- Or strike</p> <p>11 that.</p> <p>12 You're aware that at least the police account</p> <p>13 says narcotics were recovered from your mailbox in</p> <p>14 June of '04?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And the reason I said the day is</p> <p>17 because I know you were in some type of --</p> <p>18 A. Community service.</p> <p>19 Q. Yeah. Community service, right?</p> <p>20 And specifically, on June 14, 2004, was -- did</p> <p>21 you have community service on that day?</p> <p>22 A. Yes.</p> <p>23 Q. And tell me what -- Tell me what you remember</p> <p>24 about that day.</p>	<p style="text-align: center;">Page 161</p> <p>1 A. I think it was from like 8:00 or something</p> <p>2 like that to I don't know when. But I know she had to</p> <p>3 be there at 8:00 because I had to be at the community</p> <p>4 service, the Streets and Sanitation at 7:00.</p> <p>5 Q. And so what time did you finish up your work</p> <p>6 for the Adult Probation Department?</p> <p>7 A. I think she came and got me about 3:00. But</p> <p>8 we went to the school to get the kids. And then we went</p> <p>9 and got swimming trunks. And then we went to the</p> <p>10 McCormick.</p> <p>11 Q. So was it planned that you were going to go</p> <p>12 to --</p> <p>13 A. Yes.</p> <p>14 Q. -- the Hyatt at the McCormick Place?</p> <p>15 A. Yes, because that was the last day of school.</p> <p>16 So, yes.</p> <p>17 Q. Do you know when Clarissa made the reservation</p> <p>18 for the Hyatt?</p> <p>19 A. We didn't make reservations. We just went in</p> <p>20 and got a room.</p> <p>21 Q. Had you on any occasion ever gone to a hotel</p> <p>22 because you knew the police were looking for you?</p> <p>23 A. Well, I knew that that day, I got a call</p> <p>24 saying Watts said he got some drugs out the mailbox and</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 162</p> <p>1 when he see -- when he see me, he -- my smart-ass going 2 to jail for them.</p> <p>Q. Who was the friend?</p> <p>4 A. That called me?</p> <p>5 Q. Mm-hmm.</p> <p>6 A. Patrick Frazier. And he let me hear them 7 kicking on the door and everything through the phone.</p> <p>Q. So during this -- What time did you get this 9 phone call at?</p> <p>10 A. I was at the -- getting the swimming trunks. 11 Well, Clarissa was inside getting the swimming trunks. 12 I was in the car. So I don't know what time it was. I 13 know it was, like, after 3:00.</p> <p>Q. So you can actually hear the sounds of a door?</p> <p>15 A. Being kicked through the phone, because 16 Patrick was downstairs.</p> <p>Q. Where -- What apartment did -- Strike that.</p> <p>Patrick lived in the 527 building?</p> <p>19 A. No. Patrick lived in 511.</p> <p>Q. All right. So where is the door being kicked?</p> <p>21 A. 206 in 527.</p> <p>Q. So Patrick is right outside the door?</p> <p>23 A. No. He downstairs. That's how hard they was 24 kicking on the door, thinking that someone was inside.</p>	<p style="text-align: center;">Page 164</p> <p>1 A. Right.</p> <p>2 Q. Okay. So tell -- Other than you hear the 3 sound of kicking, what else do you hear?</p> <p>4 A. Then Patrick started back talking to me like, 5 "Man, he say you going to jail when he see you." So by 6 me being on probation, I went and told my probation 7 officer that this officer said that when he see me, he 8 putting these drugs on me that he got out a mailbox. 9 Then I was still on probation, reporting in to 10 Judge Toomin, and I told him the same thing. And they 11 both said, "Well, there's no active warrants for you. 12 There's nothing we can do until you've actually been 13 charged with it." Lo and behold, I guess it was like 14 nearly a month later after me telling them this, now I 15 got a -- I got a case for a mailbox.</p> <p>16 Not saying that -- Well, they never said 17 that -- My mailbox right here, you could access my 18 mailbox from the top of the mailbox, the bottom of the 19 mailbox, or from all four mailboxes around my mailbox.</p> <p>Q. Were they broken?</p> <p>21 A. No. You could reach in and do it.</p> <p>Q. You could reach into someone else's mailbox to 23 get to your mailbox?</p> <p>24 A. Yeah. From behind, yeah.</p>
<p style="text-align: center;">Page 163</p> <p>Q. Did Patrick see any police officer recover narcotics from your mailbox that day?</p> <p>3 A. I don't know if he seen it. But he told me 4 that Watts said, "I found these drugs in the mailbox. 5 And when I see his smart-ass, he going to jail." So I 6 don't know if he actually seen him take it out of there. 7 But Watts announced it.</p> <p>Q. Going back to your mailbox, would you check it every day?</p> <p>10 A. I guess. Somebody would check it.</p> <p>Q. Or Clarissa?</p> <p>11 A. Somebody would check it.</p> <p>Q. Would you ever have your kids do it, or just 13 it was you or Clarissa?</p> <p>15 A. Just either me or Clarissa.</p> <p>Q. Prior to June 14, 2004, when would have been 16 the last time you went to your mailbox?</p> <p>18 A. There's really no telling. It's like -- I 19 don't know. I guess either one of us would go every day 20 except Sunday.</p> <p>Q. Yeah.</p> <p>22 A. Because mail ain't delivered on Sunday.</p> <p>Q. But as you sit here today at this deposition, 24 you don't know one way or another, right?</p>	<p style="text-align: center;">Page 165</p> <p>Q. Well, why couldn't you just go directly into your mailbox to recover --</p> <p>3 A. I could go directly into my mailbox. I had a 4 key for my mailbox. But I'm saying anybody could have 5 put drugs in the mailbox is what I'm saying. But he 6 didn't -- he didn't see me put mail -- put drugs in the 7 mailbox. But they testified that they saw me put drugs 8 in the mailbox when we had pictures and everything 9 during the trial showing that you couldn't see from 10 their vantage point if I was in front of a mailbox or 11 not, which I wasn't. And then at that time, I had -- 12 was recovering from a gunshot wound, so how could I run 13 out the building with two able-bodied detectives and not 14 catch me?</p> <p>Q. Well, I know you're disputing that you were 16 present --</p> <p>15 A. Yeah. I wasn't there.</p> <p>Q. You are disputing that you were present at the 19 mailbox when Officer Jones and Officer Young said they 20 saw you on June 14th, correct?</p> <p>21 A. I dispute that. Yes. I wasn't there.</p> <p>Q. But you -- Am I correct that you don't know 23 whether or not there was heroin in your mailbox on that 24 day, correct?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 166</p> <p>1 A. Right. I don't know.</p> <p>2 Q. Because, like you said, you could have the 3 other individuals that are involved in narcotics 4 activity, they can put drugs in a mailbox, right?</p> <p>5 A. But what I do know is that Watts said when he 6 see me, I was being charged for those drugs. That's 7 what I did know. So when they were on shift, I wouldn't 8 even come around.</p> <p>9 Q. Patrick told -- Patrick told you that Watts 10 told him that --</p> <p>11 A. He announced --</p> <p>12 Q. -- the narcotics were recovered from your 13 mailbox, correct?</p> <p>14 A. What you say?</p> <p>15 Q. Patrick told you that Watts had told him that 16 narcotics were recovered from your mailbox, correct?</p> <p>17 MR. TEPFER: Objection.</p> <p>18 Well, go ahead. Answer the question.</p> <p>19 BY THE WITNESS:</p> <p>20 A. He told me that drugs were recovered from a 21 mailbox. He didn't say my mailbox. He just said from a 22 mailbox.</p> <p>23 Q. Okay.</p> <p>24 A. And when he see me, my smart-ass was going to</p>	<p style="text-align: center;">Page 168</p> <p>1 visit from -- Jamar and Elgen came to the hotel, and 2 Clarissa went and got something to eat. Now, if she 3 went back to the building at that time, I don't know. 4 But I didn't go back to the building with Clarissa.</p> <p>5 Q. But Clarissa said that you did go back to the 6 building.</p> <p>7 A. I'm telling you --</p> <p>8 MR. TEPFER: Objection: form, if that's a 9 question.</p> <p>10 BY MR. BAZAREK:</p> <p>11 Q. Right?</p> <p>12 A. I don't know if she said that.</p> <p>13 Q. Do you remember COPA questioning you about 14 that during an interview and then you said, "Clarissa is 15 wrong"?</p> <p>16 A. I said I didn't --</p> <p>17 MR. TEPFER: Objection to the form of the question.</p> <p>18 BY MR. BAZAREK:</p> <p>19 Q. Go ahead.</p> <p>20 A. I didn't go back to the building with 21 Clarissa.</p> <p>22 Q. To your knowledge, from any source of 23 information, did Clarissa tell COPA that you did go back 24 to the building on June 14th?</p>
<p style="text-align: center;">Page 167</p> <p>1 jail.</p> <p>2 Q. Did Patrick say there was anyone else present 3 other than Watts?</p> <p>4 A. I guess Watts' team. But he didn't, like, 5 specifically name people. He said "Watts and them." So 6 I took that to mean Watts' team.</p> <p>7 Q. All right. Other than the sound of kicking 8 that you heard being made against your apartment door, 9 what else are you hearing in terms of sounds or noise?</p> <p>10 A. Nothing, because then Pat walked away. And he 11 was saying, "Man, dude talking about you're going to go 12 to jail." And I was like, "Man, fuck him. I wasn't 13 over there." And we, like, really ended the call.</p> <p>14 Q. Now, you say you weren't over there. But 15 you're aware that Clarissa said that you did return to 16 Ida B. Wells on June 14, 2004, right?</p> <p>17 A. I'm not aware of that. I don't -- But she 18 wrong. We wasn't.</p> <p>19 Q. Well, I know that's what you told -- You told 20 COPA that she was incorrect, right?</p> <p>21 A. Yes, I believe I did.</p> <p>22 Q. You know what I'm talking about, right?</p> <p>23 A. I didn't go back to the building. Now, she 24 did take -- When we was at the hotel and then I got a</p>	<p style="text-align: center;">Page 169</p> <p>1 MR. TEPFER: Objection: calls for speculation, 2 form.</p> <p>3 BY THE WITNESS:</p> <p>4 A. I got questioned by COPA about something 5 Clarissa said. But I don't know what she actually said. 6 But I know I didn't go back to the building that day.</p> <p>7 Q. Did Jamar drive his blue Lumina to 8 McCormick Place, the Hyatt?</p> <p>9 A. I don't know. I was upstairs when they came 10 up. They caught the elevator up. It wasn't on the 11 elevator with him, if he did.</p> <p>12 Q. I'm going to read this. This is COPA Watts 13 S001437.</p> <p>14 MR. TEPFER: 001437?</p> <p>15 MR. BAZAREK: Yes.</p> <p>16 MR. TEPFER: You're not marking it as an exhibit?</p> <p>17 MR. BAZAREK: Not at the moment. I'm just going to 18 read something. This is --</p> <p>19 MR. TEPFER: I don't have it in front of me, so ...</p> <p>20 MR. BAZAREK: Well, I'll read -- I'll hand -- I'm 21 going to just read it. I can -- I'll hand it to you.</p> <p>22 MR. TEPFER: You know what? I might have it in 23 front of me. Give me a second.</p> <p>24 MR. BAZAREK: It's on page 2.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 170	Page 172
<p>1 MR. TEPFER: Is this the investigative report?</p> <p>2 MR. BAZAREK: Correct. Dated November 28, 2018.</p> <p>3 BY MR. BAZAREK:</p> <p>4 Q. And just for reference, Mr. Baker, your --</p> <p>5 this is -- your wife was being interviewed about July --</p> <p>6 or I'm sorry -- June 17, '04.</p> <p>7 MR. TEPFER: So this is the interview of</p> <p>8 Clarissa Glenn, the report of interview of Clarissa?</p> <p>9 MR. BAZAREK: Correct.</p> <p>10 MR. TEPFER: Oh, all right. I don't have that with</p> <p>11 me.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. I think I was saying June 14th in the first</p> <p>14 couple of questions. It wasn't June 14th. It was</p> <p>15 actually June 17th --</p> <p>16 A. Okay.</p> <p>17 Q. -- 2004. Okay. So your wife was being</p> <p>18 questioned by COPA about that. And I'm just going to</p> <p>19 read something to you.</p> <p>20 A. When was this?</p> <p>21 Q. This was during an interview --</p> <p>22 A. Tell me what day.</p> <p>23 Q. -- on November -- November 28, 2018. The</p> <p>24 questions are about June 17, 2004.</p>	<p>1 did not remember how Baker had received this information</p> <p>2 but thought he may have received a telephone call.</p> <p>3 "When they arrived at 527 East Browning, Glenn</p> <p>4 went upstairs with the children while Baker remained in</p> <p>5 the lobby speaking with some acquaintances. A short</p> <p>6 time later, Glenn and the children came back downstairs,</p> <p>7 and all five of them, Glenn, Baker, and the three</p> <p>8 children, walked out of the building to their car and</p> <p>9 then drove to the Hyatt near McCormick Place."</p> <p>10 So do you recall --</p> <p>11 A. No.</p> <p>12 Q. -- COPA asking you about that?</p> <p>13 MR. TEPFER: I just -- I just -- Do you want to</p> <p>14 mark an exhibit? I don't have it in front of me. I</p> <p>15 object to the extent that I don't know if you read it</p> <p>16 correctly or not. But go ahead.</p> <p>17 MR. BAZAREK: Well, we can mark this as an exhibit.</p> <p>18 Let's just make this one number ...</p> <p>19 THE REPORTER: 4.</p> <p>20 MR. BAZAREK: This is 4?</p> <p>21 THE REPORTER: Mm-hmm.</p> <p>22 MR. BAZAREK: Yeah.</p> <p>23 (Baker Deposition Exhibit No. 4</p> <p>24 marked for identification.)</p>
Page 171	Page 173
<p>1 MR. TEPFER: So you're asking him questions about</p> <p>2 what COPA reported about the interview --</p> <p>3 MR. BAZAREK: Yeah. Yeah. I'm going to read it.</p> <p>4 MR. TEPFER: Can I just finish my clarification?</p> <p>5 MR. BAZAREK: Yes.</p> <p>6 MR. TEPFER: You're asking him questions about what</p> <p>7 COPA asked Clarissa --</p> <p>8 MR. BAZAREK: Correct.</p> <p>9 MR. TEPFER: -- during her interview?</p> <p>10 MR. BAZAREK: Yes.</p> <p>11 MR. TEPFER: Okay.</p> <p>12 MR. BAZAREK: Yeah. And I've already supplied the</p> <p>13 COPA Watts Bates number.</p> <p>14 MR. TEPFER: Yeah. And I don't have it in front of</p> <p>15 me, as I said.</p> <p>16 BY MR. BAZAREK:</p> <p>17 Q. I'll just read a portion. This is on page 2.</p> <p>18 "While driving back to their residence at</p> <p>19 527 East Browning, Glenn and Baker picked up their three</p> <p>20 children. Glenn could not remember if they picked up</p> <p>21 the children from school or from a summer program.</p> <p>22 Glenn remembered that Baker had learned that Watts was</p> <p>23 looking to arrest him, and they decided to stop quickly</p> <p>24 at their residence and then check into a hotel. Glenn</p>	<p>1 MR. BAZAREK: All right. You can look at it.</p> <p>2 MR. TEPFER: All right. I think he started at this</p> <p>3 paragraph.</p> <p>4 BY MR. BAZAREK:</p> <p>5 Q. Yeah. Take a look at that portion, Mr. Baker,</p> <p>6 and then tell me when you're done looking at it.</p> <p>7 A. I'm done looking at it.</p> <p>8 Q. Okay. So Clarissa said that you did go back</p> <p>9 to Ida B. Wells after you received information that the</p> <p>10 police were looking for you?</p> <p>11 MR. TEPFER: Objection: calls for speculation of</p> <p>12 what Clarissa said in an interview he wasn't at, so I</p> <p>13 object to the form of the question.</p> <p>14 But you can try to answer it.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I don't know what Clarissa is talking about.</p> <p>17 But I'm saying if the police looking to arrest me, why</p> <p>18 would I deliver myself to the lion's den? No, I didn't</p> <p>19 go back to the building.</p> <p>20 Q. So your testimony is that after --</p> <p>21 A. If she said -- Okay. I'm listening.</p> <p>22 Q. You would agree that Clarissa did pick you up</p> <p>23 from -- is it the SNAP program? Am I saying it right?</p> <p>24 What is that called?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 174	Page 176
<p>1 A. Community service. SWAP.</p> <p>2 Q. SWAP.</p> <p>3 A. Yeah.</p> <p>4 Q. After -- Your testimony, sir, is after --</p> <p>5 Well, strike that.</p> <p>6 At any time after Clarissa picked you up from 7 community service on June 17, 2004, did you return to 8 Ida B. Wells?</p> <p>9 A. No.</p> <p>10 Q. But according to that report, Clarissa said 11 you did go back there, right?</p> <p>12 A. That's something you would have to take up with Clarissa. I'm telling you I didn't go back there.</p> <p>13 Q. So if Clarissa is saying that you did go back 14 there, she's wrong?</p> <p>15 A. Yeah. She's --</p> <p>16 MR. TEPFER: Objection: calls for speculation.</p> <p>17 But go ahead.</p> <p>18 BY THE WITNESS:</p> <p>19 A. Yeah. She's mistaken.</p> <p>20 Q. Have you ever talked to her about that?</p> <p>21 A. No.</p> <p>22 Q. Not once?</p> <p>23 A. No. I don't know what she said during none of</p>	<p>1 that?</p> <p>2 A. Yes. We drove to the -- I drove, actually.</p> <p>3 She went in the school, got the kids. We drove to get 4 the swimming trunks and -- swimming trunks off of 22nd, 5 I believe, off of Cermak. And then we -- I drove into 6 the hotel. And then they had the -- like, the valet 7 parking. And we went up to the room. And the kids went 8 swimming initially by theirself. And they said that the 9 kids couldn't be down there by theirself; an adult had 10 to be with them. So Clarissa went down there with them, 11 and they swam for a while. Then they came back up.</p> <p>12 And then at that time, Jamar and Elgen came, 13 and we smoked a blunt in the bathroom of the hotel.</p> <p>14 Clarissa left to go get food off of 51st right off 15 King Drive. It was a little soul food restaurant over 16 there. Now, I'm saying from the time she left there to 17 the time she came back with the food, maybe she stopped 18 at the hote- -- I mean, the building. But she didn't go 19 to the building with me in the car on that day.</p> <p>20 Q. When Clarissa left to get food, where were the 21 kids?</p> <p>22 A. They left with her.</p> <p>23 Q. On the way in the car to the hotel, did you 24 tell Clarissa what Patrick had told you?</p>
<p style="text-align: center;">Page 175</p> <p>1 her interviews. No.</p> <p>2 Q. Well, after COPA interviewed you, they brought 3 that to your attention, right?</p> <p>4 A. And what did I tell COPA?</p> <p>5 Q. Right. You said Clarissa is wrong.</p> <p>6 A. Okay. So now she going to be right?</p> <p>7 Q. So when you went home that day after that 8 interview with COPA, did you talk to Clarissa about 9 that?</p> <p>10 A. No.</p> <p>11 Q. Did you ever say to her, "Hey, why did you say 12 I was at Ida B. Wells on June 17th when I wasn't in 13 the -- you know, after the community service?"</p> <p>14 A. No, because I knew there was a chance that she 15 went back to the building when I was at the hotel.</p> <p>16 Q. Okay.</p> <p>17 A. She probably did go to the building, her and 18 the kids. But I wasn't there.</p> <p>19 Q. Well, how would you have gotten to the hotel?</p> <p>20 A. We drove to the hotel.</p> <p>21 Q. So is it your testimony -- Well, let me ask 22 you, like, do you remember driving to the hotel?</p> <p>23 A. Yeah.</p> <p>24 Q. You have an independent recollection of doing</p>	<p style="text-align: center;">Page 177</p> <p>1 A. Yeah. So that's how I know I didn't go back 2 to the building. Why would I go back to the building?</p> <p>3 Q. What exactly did you tell Clarissa?</p> <p>4 A. "Pat said Watts say he found some drugs in a 5 mailbox and when he see me, I'm going to jail for it."</p> <p>6 Q. And what did Clarissa say to that?</p> <p>7 A. "He can't do that."</p> <p>8 Q. What did you say?</p> <p>9 A. "Why can't he?"</p> <p>10 Q. All right. What else happened the rest of 11 that evening at the hotel?</p> <p>12 A. When she came back with the food, Jamar and 13 Elgen left. We ate. We watched TV and went to sleep.</p> <p>14 Q. So now you're at the hotel. You know the 15 police are looking for you. Right?</p> <p>16 A. Well, I can't say they was really -- Well, 17 yeah.</p> <p>18 Q. What did you do the next day?</p> <p>19 A. I went to another hotel.</p> <p>20 Q. Was that part of because school was over, or 21 there was a different reason now --</p> <p>22 A. Yeah.</p> <p>23 Q. -- that you were going to a different hotel?</p> <p>24 A. School was over. But my kids, during the</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 178	Page 180
<p>1 summer, one would go to his grandfather's house, which 2 was Clarissa's dad. That was my youngest, Deon. My son 3 little Ben, he would go to Milwaukee with our kinfolks 4 there. And then Gerard, you know, he my son, but he's 5 not my biological son. So he would go to his people's 6 house for the summer. And then when they come back from 7 summer break, then we would take them somewhere like to 8 Wisconsin Dells or somewhere like that. We would go on 9 a little mini trip with them just before school start 10 back.</p> <p>11 So when we sent them their separate ways, me 12 and Clarissa used to go to the hotel, and then we would 13 come back to the building when Watts and them wasn't 14 working, when their shift was over with, which was 15 really hard to tell because they would always be there. 16 Sometimes you look up, they're there at 7:00, 17 8:00 o'clock at night.</p> <p>18 Q. What was the hotel that you stayed at the next 19 night?</p> <p>20 A. I believe it was the Ranch.</p> <p>21 Q. Where is that?</p> <p>22 A. The motel down on -- I think it's 93rd and 23 Stony Island. So we would stay there. And then it was 24 another one, like, a little further down, like -- I</p>	<p>1 finally came back to the building while I was in the 2 building, beating on the door.</p> <p>3 Q. Yeah. I'm just trying to -- I know you got 4 arrested in July. I'm just trying to find out how long 5 you were staying at hotels because you didn't want to be 6 apprehended.</p> <p>7 A. Well, I don't know exactly how many days I 8 stayed at the hotel. But I would go home sometimes to 9 the building, and then we would leave out like 6:00, 10 6:15 in the morning before Watts and them actually came 11 on. So I wasn't, like, in hotels the whole time. I 12 would spend nights in the apartment and then get out of 13 there before Watts and them came on.</p> <p>14 Q. All right. But you knew at least since 15 July 17 -- Or strike that.</p> <p>16 You knew at least since June 17, 2004, that 17 the police were looking for you, right?</p> <p>18 A. That they say when they see me that I was 19 going to jail.</p> <p>20 Q. Right.</p> <p>21 A. I don't know if they was actively. But I know 22 he said when he see me, I was going to jail for what he 23 found in the mailbox.</p> <p>24 Q. Okay. Did the fact that the police were</p>
Page 179	Page 181
<p>1 forgot the name of it. But it may have been five or six 2 blocks down from the Ranch.</p> <p>3 Q. I want to understand, though. Are you staying 4 at the hotel the second night because --</p> <p>5 A. Because --</p> <p>6 MR. TEPFER: Let him finish.</p> <p>7 BY MR. BAZAREK:</p> <p>8 Q. -- you know the police are looking for you, or 9 this is part of, hey, you know, it's summertime now and 10 the kids are going to do different things and we're 11 going to get a hotel?</p> <p>12 A. Because I didn't want Watts to put that case 13 on me.</p> <p>14 Q. Okay.</p> <p>15 A. So I would stay out of his way.</p> <p>16 Q. All right. So then what about day three? Do 17 you stay at another hotel?</p> <p>18 A. Yes.</p> <p>19 Q. What hotel do you stay at on day three?</p> <p>20 A. I told you, I was back and forth from the 21 Ranch to the other hotel down Stony. I would go back 22 and forth. And then when I was thinking Watts and them 23 wasn't there, I would go back to the building, which I 24 got tired of that. And that's when Watts and them</p>	<p>1 looking for you beginning in June of 2004 affect your 2 narcotics sales?</p> <p>3 A. Yeah.</p> <p>4 Q. How?</p> <p>5 A. Because I wasn't there to sell it.</p> <p>6 Q. Well, you've got your workers, right? You've 7 got -- Bryant Patrick and Elgen Moore could sell drugs 8 for you?</p> <p>9 A. They could have.</p> <p>10 MR. TEPFER: Objection: argumentative, form. 11 Go ahead.</p> <p>12 BY THE WITNESS:</p> <p>13 A. But I didn't.</p> <p>14 Q. During 2000- -- Or strike that.</p> <p>15 During June of 2004, who was your drug 16 supplier?</p> <p>17 A. Different people.</p> <p>18 Q. Who?</p> <p>19 A. What drugs you talking?</p> <p>20 Q. Well, you sold heroin, right?</p> <p>21 A. Yeah.</p> <p>22 Q. And you sold cocaine?</p> <p>23 A. Yeah.</p> <p>24 Q. I don't know if I've heard that you sold</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 182	Page 184
<p>1 marijuana. Did you sell marijuana, too?</p> <p>2 A. No.</p> <p>3 Q. All right. Cocaine and heroin?</p> <p>4 A. Yeah.</p> <p>5 Q. Any other controlled substances you sold?</p> <p>6 A. No.</p> <p>7 Q. Okay. So in 2004, who was your supplier for heroin?</p> <p>8 A. I used to get heroin from my cousin.</p> <p>9 Q. What's your cousin's name?</p> <p>10 A. Eddie Baker.</p> <p>11 Q. Did you have any -- In 2004, did you have any other supplier for that narcotic other than Eddie Baker?</p> <p>12 A. Maybe if he didn't have none, there probably was somebody here or there that did. I don't, like, recall who.</p> <p>13 Q. Where is Eddie Baker these days?</p> <p>14 A. He living.</p> <p>15 Q. He's -- Is he a drug dealer --</p> <p>16 A. No.</p> <p>17 Q. -- or just a supplier?</p> <p>18 A. Neither.</p> <p>19 Q. Well, where would he get the drugs to give you?</p>	<p>1 Q. Eddie Baker.</p> <p>2 Who supplied you with cocaine to sell during 2004?</p> <p>3 A. It was a few people. Like, I know this guy named Polo. I got cocaine from him mainly.</p> <p>4 Q. During 2004, did you sell more heroin or more cocaine?</p> <p>5 A. I'm not sure.</p> <p>6 Q. Was it equal?</p> <p>7 A. I'm not sure.</p> <p>8 Q. Other than Polo, did anyone else supply you with cocaine during 2004?</p> <p>9 A. I believe somebody, yeah. But I can't recall. It was so long ago.</p> <p>10 Q. So the only one who you remember supplying you with cocaine to sell during 2004 was Polo?</p> <p>11 A. It was the constant. That's who I used to go to.</p> <p>12 Q. Okay. When is the last time you saw or had contact with Polo?</p> <p>13 A. I actually talked to Polo the other day because his friend died and he was trying to raise money for the funeral.</p> <p>14 Q. Is it, like, a GoFundMe page?</p>
<p>1 A. That, I don't know.</p> <p>2 Q. Is -- Earlier in the dep, we were talking about David Baker, Bali. Is David Baker related to you?</p> <p>3 A. No. I have a cousin named David Baker.</p> <p>4 Q. All right. It's a different David Baker, right?</p> <p>5 A. Yeah, yeah. He live in Milwaukee.</p> <p>6 Q. And I don't know if I asked you this, but do you remember ballpark how old David Baker, aka Bali, is?</p> <p>7 A. No, I don't know how old Bali is.</p> <p>8 Q. Okay. All right. So, I'm sorry. David Baker would supply you with heroin or cocaine?</p> <p>9 MR. TEPFER: Objection.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I never said --</p> <p>12 MR. TEPFER: Objection: misstates the testimony.</p> <p>13 MR. BAZAREK: Now I'm confused.</p> <p>14 MR. TEPFER: You said David Baker.</p> <p>15 MR. BAZAREK: What did I say?</p> <p>16 MR. TEPFER: You said David Baker.</p> <p>17 BY MR. BAZAREK:</p> <p>18 Q. Who supplied you with heroin during 2004 that you would sell?</p> <p>19 A. Eddie. Eddie Baker.</p>	<p>1 A. I don't know if it's a GoFundMe page. He called me off Facebook Messenger.</p> <p>2 Q. On Facebook, what does he go by? Polo?</p> <p>3 A. No. Mark.</p> <p>4 Q. What's Mark's last name?</p> <p>5 A. Holliman.</p> <p>6 Q. Can you spell it?</p> <p>7 A. H-O-L-L-I-M-A-N.</p> <p>8 Q. To your knowledge, does Mark Holliman still engage in narcotics activity?</p> <p>9 A. No. If he did, he wouldn't have been calling me trying to raise money for his friend's funeral.</p> <p>10 Q. Okay. All right. So let's go to the next month, July of '04. You know the police are looking for you, right?</p> <p>11 A. Okay.</p> <p>12 Q. And --</p> <p>13 MR. TEPFER: We've been going about an hour and ten minutes straight. I'm going to need a little five-minute break at some point soon.</p> <p>14 MR. BAZAREK: Do you want to break now?</p> <p>15 MR. TEPFER: Can we?</p> <p>16 MR. BAZAREK: Let's just break.</p> <p>17 THE VIDEOGRAPHER: The time is 3:03 p.m. We are</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 186	Page 188
<p>1 now off the record.</p> <p>2 (A short break was had.)</p> <p>3 THE VIDEOGRAPHER: The time is 3:13 p.m. We are</p> <p>4 now back on the record.</p> <p>5 BY MR. BAZAREK:</p> <p>6 Q. All right. Mr. Baker, I want to ask you about</p> <p>7 your arrest on July 11, 2004. Do you remember that day?</p> <p>8 A. Yes.</p> <p>9 Q. What's the first thing you remember about that</p> <p>10 day?</p> <p>11 A. The officers knocking on the door.</p> <p>12 Q. Who knocked on the door?</p> <p>13 A. It was Watts; I believe it was AJ and a couple</p> <p>14 more.</p> <p>15 Q. Who were the other two?</p> <p>16 A. I can't recall.</p> <p>17 Q. Who was inside your apartment?</p> <p>18 A. Me, Clarissa, and Elgen Moore.</p> <p>19 Q. Did Elgen Moore sell narcotics for you that</p> <p>20 day?</p> <p>21 A. No.</p> <p>22 Q. Why not?</p> <p>23 A. Because your clients was looking for me to put</p> <p>24 drugs on me, so I wouldn't sell drugs.</p>	<p>1 Q. And was she working that day?</p> <p>2 A. No.</p> <p>3 Q. Was it her day off, or she just wasn't</p> <p>4 working?</p> <p>5 A. She wasn't working that day.</p> <p>6 Q. Okay. Do you remember what day of the week it</p> <p>7 was?</p> <p>8 A. No.</p> <p>9 Q. Were the kids home?</p> <p>10 A. No.</p> <p>11 Q. Where were the kids?</p> <p>12 A. I told you, the kids was -- (gesturing) -- for</p> <p>13 the summer.</p> <p>14 Q. Okay. All right. So you hear a knock on the</p> <p>15 door. Is anyone saying anything?</p> <p>16 A. No. Clarissa go to the door and ask, "Who is</p> <p>17 it?"</p> <p>18 Q. Then what happened?</p> <p>19 A. It's the police. And she opened the door.</p> <p>20 Q. Then what happened?</p> <p>21 A. They came in.</p> <p>22 Q. Who came in?</p> <p>23 A. Watts, AJ, and a couple more officers.</p> <p>24 Q. Who were the other officers?</p>
<p style="text-align: center;">Page 187</p> <p>1 Q. What time would Elgen Moore ordinarily sell</p> <p>2 narcotics for you?</p> <p>3 A. We didn't sell during that time period.</p> <p>4 Q. What does that mean?</p> <p>5 A. I refused to sell drugs with your officers</p> <p>6 running roughshod trying to put drugs on me, put a drug</p> <p>7 case on me. So we didn't sell drugs during that time.</p> <p>8 Q. So it's your testimony, sir, that during</p> <p>9 July of 2004, you engaged in no narcotics activity?</p> <p>10 A. Right.</p> <p>11 Q. And that also means that you didn't have</p> <p>12 people selling drugs for you during July of '04,</p> <p>13 correct?</p> <p>14 A. Right.</p> <p>15 Q. Okay. What time did Elgen get to your</p> <p>16 apartment?</p> <p>17 A. I don't know. It was -- because he lived in</p> <p>18 the building. He just came downstairs.</p> <p>19 Q. Okay.</p> <p>20 A. Because he called my phone and was like -- I'm</p> <p>21 like, "I'm in the crib." And he came down. I don't</p> <p>22 exactly know what time it was.</p> <p>23 Q. Okay. And Clarissa was home, right?</p> <p>24 A. Yes.</p>	<p style="text-align: center;">Page 189</p> <p>1 A. I don't recall who the other officers were.</p> <p>2 Q. What race were they?</p> <p>3 A. I don't recall.</p> <p>4 Q. Were they men or women?</p> <p>5 A. They were Chicago police officers.</p> <p>6 Q. Were they -- Were any of them female?</p> <p>7 A. They were Chicago police officers. That's</p> <p>8 what I recall.</p> <p>9 Q. All right. So as you sit here at this</p> <p>10 deposition, you don't know if those other two officers</p> <p>11 were male or female?</p> <p>12 A. I don't recall.</p> <p>13 Q. Right. As you sit here at this deposition,</p> <p>14 you don't know whether those two other officers were</p> <p>15 male or female, correct?</p> <p>16 MR. TEPFER: Asked and answered.</p> <p>17 BY THE WITNESS:</p> <p>18 A. I don't recall. But I know I encountered</p> <p>19 other officers at the substation. And I know that</p> <p>20 Gonzalez and Bolton drove me from the substation to</p> <p>21 51st Street.</p> <p>22 Q. I want to focus on inside your apartment.</p> <p>23 A. Of course.</p> <p>24 Q. So Clarissa let the officers in?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 190</p> <p>1 A. She opened the door, and they just walked in. 2 They, "Who in here?" And they came in. And then when 3 Watts saw me, he was like, "If I find drugs in here, 4 everybody going to jail. And if I don't find nothing, 5 you're going for the mailbox shit."</p> <p>6 Q. Who said that? 7 A. Watts.</p> <p>8 Q. Did any other officers say anything? 9 A. Not while Watts talking, no.</p> <p>10 Q. Did Alvin Jones say anything at any time while 11 inside the apartment? 12 A. He laughed. And then he started searching.</p> <p>13 Q. So other than laughing, Alvin Jones never said 14 anything; is that correct? 15 A. Not at that time, no.</p> <p>16 Q. I'm just talking about inside the apartment. 17 A. I said not at that time, no.</p> <p>18 Q. Describe the search that was going on inside 19 the apartment. 20 A. I didn't actually see the actual search 21 because we was sitting in the living room, and they went 22 throughout the place. And then Watts say, "Okay. Well, 23 ain't nothing here. Put cuffs on them two." He's 24 talking about me and Elgen.</p>	<p style="text-align: center;">Page 192</p> <p>1 Q. Do you know what those are, ANOV? 2 A. No, probably not that terminology.</p> <p>3 Q. Administrative notice of violation where 4 they -- say you're drinking on a public way, they'll 5 give you, like, a ticket. 6 A. But he wasn't drinking on a public way.</p> <p>7 Q. Yeah. I'm just saying as an example. 8 A. I don't know what he received.</p> <p>9 Q. Okay. 10 A. But I know they let him go.</p> <p>11 Q. They let him go? 12 A. Yeah.</p> <p>13 Q. Okay. So was Clarissa saying anything inside 14 the apartment? 15 A. I don't recall because I was just so heated. 16 I don't know if she said something or not.</p> <p>17 Q. Were you ever put on the ground that day 18 inside the apartment? 19 A. Yeah. Down on our knees while they searched. 20 I believe we was down on our knees as they searched --</p> <p>21 Q. But -- 22 A. -- for our safety and theirs.</p> <p>23 Q. All right. But when you were -- You were not 24 placed in handcuffs until after the search was</p>
<p style="text-align: center;">Page 191</p> <p>1 Q. Who -- And then were cuffs put on you? 2 A. Yes.</p> <p>3 Q. Were cuffs put on Elgen? 4 A. Yes.</p> <p>5 Q. Who put the cuffs on you? 6 A. AJ put the cuffs on me. And I don't know 7 which officer put them on Elgen because they took me 8 out. AJ put the cuffs on me and took me out.</p> <p>9 Q. Out of the apartment? 10 A. Yes.</p> <p>11 Q. Okay. 12 A. So I don't know who put the cuffs on Elgen.</p> <p>13 Q. Was there a warrant or anything for Elgen's 14 arrest? 15 A. Not that I know of. They said they charged 16 him with, like, solicitation or some -- But they say he 17 was in the hallway serving, which was a lie. But he was 18 released from the substation.</p> <p>19 Q. Did he get a -- like, a citation, or did they 20 just let him go? 21 A. Yeah. I think he got a ticket. But I'm not 22 sure.</p> <p>23 Q. Was it one of those ANOVs? 24 A. I'm not sure.</p>	<p style="text-align: center;">Page 193</p> <p>1 conducted, correct? 2 A. Right.</p> <p>3 Q. Okay. So you were just on your knees? 4 A. Yeah.</p> <p>5 Q. You and Elgen? 6 A. Yeah.</p> <p>7 Q. What about Clarissa? 8 A. Sitting on the couch.</p> <p>9 Q. Was anything saying anything -- Was -- Strike 10 that. 11 Other than Watts, did anyone else say anything 12 inside the apartment? 13 A. Not while Watts talking. Nobody talk while 14 Watts talking.</p> <p>15 Q. Okay. When Watts wasn't talking, did anyone 16 else say -- You gotta let me finish. 17 When Watts wasn't talking, did anyone else -- 18 Strike that. 19 When Watts wasn't talking, did any other 20 police officers say anything inside the apartment? 21 A. Other than AJ laughing, I don't recall. I 22 don't recall someone saying something.</p> <p>23 Q. I mean, who knows why people laugh. But why 24 do you think --</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 194	Page 196
<p>1 A. I don't know.</p> <p>2 Q. Why do you think -- Why do you think Jones was laughing?</p> <p>3 A. Because they knew they was taking me to jail.</p> <p>5 Q. Do you have dogs?</p> <p>6 A. Yeah, I have dogs.</p> <p>7 Q. Did you have dogs in July of 2004 that were kept in your apartment?</p> <p>9 A. I don't believe so. There was no dog there at that time. When they arrested me, no, we didn't have a dog at that time. But I have had dogs there.</p> <p>12 Q. What kind of dogs have you had in your apartment?</p> <p>14 A. I had a pit bull before. And I had -- Well, I had probably two pit bulls, you know, different occasions. And then as we left, when I went to jail in 2006, then we had a cane corso. But she was, like, a puppy at the time.</p> <p>19 Q. So from -- In 2003, did you have a pit bull?</p> <p>20 A. Yeah, I believe I did.</p> <p>21 Q. So --</p> <p>22 A. I believe I had Diamond.</p> <p>23 Q. So what happened to Diamond by the time 2004 rolled around?</p>	<p>1 A. Yeah.</p> <p>2 Q. Okay.</p> <p>3 A. And we went in separate cars.</p> <p>4 Q. Who took you out of the apartment?</p> <p>5 A. Alvin, AJ.</p> <p>6 Q. Was AJ saying anything to you when he took you out?</p> <p>8 A. I wasn't saying anything to him, so he -- I don't know. I just was so mad. I don't know if he said something or not. I don't know.</p> <p>11 Q. Were you -- I mean, were you upset?</p> <p>12 A. That's what mad mean.</p> <p>13 Q. Were you swearing and yelling?</p> <p>14 A. No. It was internal.</p> <p>15 Q. Okay. So where does AJ take you to?</p> <p>16 A. To the squad car.</p> <p>17 Q. Okay. Anyone in the squad car other than you and AJ?</p> <p>19 A. No. He didn't get in at that time. He just put me in there and stood there.</p> <p>21 Q. Okay. Then what happened?</p> <p>22 A. And then Watts came down, got in the car, and we drove to the substation on -- I think it was 37th Place or Street. It was close to Cottage Grove. I</p>
<p style="text-align: center;">Page 195</p> <p>1 A. Well, Diamond had went deaf, so I gave her away to somebody that I figured could take care of her better than me.</p> <p>4 Q. Okay. Was that in '03 or '04?</p> <p>5 A. I'm not sure. But I know I gave her away. She wasn't there then.</p> <p>7 Q. And so after you gave Diamond away, what was the next dog you had?</p> <p>9 A. Diamond was the next dog. I had a little dog named Bar None. But then I took him to my auntie's house one time because they was doing an inspection or something, and her dog actually killed Bar None. And then I got Diamond.</p> <p>14 Q. Okay. All right. In any event, there was no dog in the house that day, right?</p> <p>16 A. Right.</p> <p>17 Q. Okay. And so you're taken out of the apartment in handcuffs, right?</p> <p>19 A. Yes.</p> <p>20 Q. With Elgen, right?</p> <p>21 A. No. Elgen was still in. That's how I don't know who put handcuffs on Elgen. They took me downstairs first.</p> <p>24 Q. By yourself?</p>	<p style="text-align: center;">Page 197</p> <p>1 know that.</p> <p>2 Q. Okay. So in the car that took you to the substation, it's just you, Watts, and Jones, correct?</p> <p>4 A. I believe so, yes.</p> <p>5 Q. Was anything said by either of them during the drive to the substation?</p> <p>7 A. I don't know. I probably said something along the lines of "This some bullshit." But I can't recall.</p> <p>9 Q. Okay. What happens at the substation?</p> <p>10 A. They put me in this back room, handcuffed me to the wall. And I guess they was doing paperwork. And then after they got through with me saying "This some bullshit" and whoo, whoo but ain't nobody really saying nothing to me that I can recall, then Gonzalez and Bolton, who were partners at the time, drove me to 51st Street.</p> <p>17 And at that time, if they going to be truthful, Gonzalez and Bolton -- Well, Bolton didn't say anything. But Gonzalez was like, "Well, I don't know what's going on with you and Watts. But you know if we wanted to put something on you, we could have been done that" when he was -- Him and Bolton used to work what we call the alligator, which was a squad van with the lights on top of it. They used to be in uniform with</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 198	Page 200
<p>1 Cadman and a couple more of them, Sergeant Ramirez or 2 something like that, before they actually got in 3 Watts' -- on Watts' team. So they used to be running in 4 and out the building.</p> <p>5 So it -- That's what he said, "If we wanted to 6 put something on you, we could have -- If we wanted to 7 arrest you, we could have been put something on you. 8 But we don't work like that." But you cosigning it, so 9 I guess times changed.</p> <p>10 Q. So Gonzalez told that to you on your way to 11 the 2nd District?</p> <p>12 A. Yes.</p> <p>13 Q. And he was in the car with Bolton?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Going back to the time period when you 16 were at the substation, did any officer say anything at 17 any time?</p> <p>18 A. I don't recall.</p> <p>19 Q. Would anything help you recall?</p> <p>20 A. If you had a recording. But I don't know. I 21 was upset. So if they was saying something, they wasn't 22 talking about not putting that case on me. So whatever 23 they said ...</p> <p>24 Q. Did you say anything to anyone while you were</p>	<p>1 2nd District. Then what happens? You go to lockup? 2 A. 2nd District is 51st and Wentworth? Yeah, 3 they took me there. And, yeah, I went to lockup. 4 Q. Okay. Did Gonzalez or Bolton say anything to 5 you inside 51st and Wentworth? 6 A. Not that I can recall. 7 Q. And then ultimately, you had to make a court 8 appearance, right? 9 A. Yeah. 10 Q. And were you released on bond, or were you 11 in -- did you stay in jail? 12 A. I stayed in jail. 13 Q. For how long? 14 A. I think from that time until we filed a motion 15 to suppress. Like, and then they continued the motion. 16 And then Thanksgiving eve, the judge actually heard the 17 motion. And that's when Clarissa supplied the pictures 18 and all that. And the judge said, "Motion granted. 19 Have a nice Turkey Day, Mr. Baker." 20 Q. Okay. So then you were in custody from the 21 time of your arrest until the Wednesday before 22 Thanksgiving of 2004? 23 A. Yes, I guess so. 24 Q. Okay. I'm just trying to figure out if you</p>
<p style="text-align: center;">Page 199</p> <p>1 at the substation? 2 A. Yeah. I kept hollering out -- Well, not to no 3 one specific that I believe. But I was just hollering 4 out "This some bullshit" because there was another team 5 of officers there. Like, I guess they was doing 6 paperwork, too, because there was an officer sitting at 7 the desk while I'm handcuffed to this -- to the wall. 8 But he wasn't part of Watts' team, that I knew of. 9 Q. But tell me what -- anything that you said. 10 A. I was just cursing and saying "This is bull, 11 and this ain't right." But -- 12 MR. TEPFER: I want to remind you to let him finish 13 the question just for her. Okay? 14 THE WITNESS: Oh, okay. 15 BY MR. BAZAREK: 16 Q. Did anyone respond to you? 17 A. I don't know. 18 Q. Okay. Did you ask to talk to a supervisor or 19 anything like that? 20 A. Watts was the supervisor. 21 Q. Right. Someone who -- higher rank than Watts? 22 A. No. I don't believe there was somebody higher 23 than Watts. 24 Q. Okay. So Gonzalez and Bolton take you to the</p>	<p style="text-align: center;">Page 201</p> <p>1 had bonded out or anything like that. 2 A. No. I -- No. 3 Q. Okay. And then I know you have said that at 4 some point you came upon Officer Jones, and he discussed 5 the case being dismissed. Is that right? 6 A. Yes. 7 Q. And where was this conversation that you had 8 with Officer Jones? 9 A. It's, like, on Browning but, like, the side of 10 the building, side of 527 and 511. They was on either 11 side of the fire lane. So we, like, at the end of the 12 fire lane, but I'm standing in the grass on the 527 13 side. 14 Q. Do you remember what month it was? 15 A. It might have still been November, or it could 16 have been the beginning of December. 17 Q. Were you with anyone? 18 A. Yeah. Toke was right there. Well, 19 Talawrence (phonetic). He -- Rest in peace. He's dead now. 20 Q. He's deceased? 21 A. (Nodding head.) 22 MR. TEPFER: You okay? 23 THE WITNESS: Yeah.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 202	Page 204
<p>1 MR. TEPPER: Do you need some water? 2 THE WITNESS: No. 3 BY MR. BAZAREK: 4 Q. How did he die? 5 A. He got shot. But I was in jail. 6 Q. What was -- And his last name was Fullbanks? 7 A. Fumbanks. 8 Q. Fumbanks. 9 What was his role in the narcotics operations 10 at Ida B. Wells? 11 A. He didn't sell drugs with me, so I don't -- 12 I'm not privy to that. I don't know. 13 Q. Was he a high-level drug dealer? 14 A. I don't know. 15 Q. Okay. Did you ever work for him? 16 A. No. 17 Q. Did he ever supply you with narcotics to sell? 18 A. No. 19 Q. Okay. So tell me everything said -- Strike 20 that. 21 Anyone else other than you, Mr. Fumbanks, and 22 Jones? 23 A. It was -- Now I know that the little Asian 24 person was Manny Leano. But I know I described him as</p>	<p>1 A. July 11? 2 Q. July 11, 2004. 3 A. The day when they arrested me? 4 Q. Yes. 5 A. I'm not sure. I don't think so, though. 6 Q. Okay. By the way, you recall earlier in the 7 deposition you testified that there were two other 8 officers -- you don't know if they were a man or a 9 woman -- that went inside your apartment -- 10 A. Right. 11 Q. -- on July 11, 2004, correct? 12 A. Right. 13 Q. Was Bolton or Gonzalez either of those 14 officers? 15 A. I don't know. It could have been. But I'm -- 16 I don't remember. 17 Q. Okay. What else did Jones say at that time? 18 A. "Kenny won't be there next time to fuck up the 19 testimony." His words. So I took that to mean they was 20 going to put another case on me. That was me thinking 21 logically. 22 Q. Okay. So that's going to be in November or 23 December of '04, correct? 24 A. Yes.</p>
<p style="text-align: center;">Page 203</p> <p>1 an Asian person or Filipino or something. But that's 2 who was with AJ that day. 3 Q. And this is sometime in 2004? 4 A. I believe so. I believe it was Manny 5 because -- I believe it was Manny. But, then again, I 6 don't know because at that time, when he said it, he was 7 like, "Yeah, Kenny fucked up the" -- I said, "Man, you 8 know that was some bullshit y'all put that case on me." 9 He was like, "Well, you know the game. You win some; 10 you lose some." Then he had the nerve to tell me I 11 should have been gone for a couple of Olympics. You 12 know, Olympics every four years. You know, so I should 13 have been gone two or three Olympics. But that's 14 neither here nor there. 15 I was like, "Man, that was some bullshit." 16 And he was like, "Well, Kenny fucked up the testimony, 17 but he won't be able to fuck it up no more." So I took 18 that to mean whoever this guy was was Kenny's 19 replacement. 20 Q. Who is Kenny? 21 A. Kenneth Young, the one that testified with AJ 22 in the mailbox case. 23 Q. At any time on July 11, 2004, did you observe 24 Officer Kenneth Young?</p>	<p style="text-align: center;">Page 205</p> <p>1 Q. At the time, you know, November, December 2 of '04, did you tell anyone about your discussion with 3 Officer Jones? 4 A. I believe -- I believe I told -- I told, like, 5 the people I was hanging around with. 6 Q. Who? 7 A. Like the people from the building, Jamar, 8 Elgen, Bryant. Just whoever would be standing at the 9 building. 10 Q. So after the mailbox case got dismissed, did 11 you go back to selling narcotics at Ida B. Wells? 12 A. I probably did. But I'm not sure. But, yeah, 13 I probably did. 14 Q. When was -- After that discussion with 15 Officer Jones, when would have been your next 16 interaction with any member of Watts's team? 17 A. Basically every day. They was there basically 18 every day. So if I'm sitting on the front of the 19 building, they would come through; they would say 20 different things. 21 Q. Say what? 22 A. You know, "You out here, huh? CPR working. 23 Is y'all doing this, doing that?" Things like that. 24 Q. What's CPR working? What does that mean?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 206</p> <p>1 A. That was the name of the drug line, the heroin 2 line. Well, that was one of the names in the building. 3 Q. What was your drug line called? 4 A. CPR. 5 Q. So what does that mean? Like, strong stuff 6 that's going to stop your heart? 7 A. When you give people CPR, you're actually 8 jumping their heart; ain't you? If you fell out right 9 now and your heart stopped, I give you CPR, I'm 10 resuscitating you. 11 Q. Right. But the reason you -- 12 A. I just thought it was clever. 13 Q. The reason you need CPR is because -- 14 A. Your heart stopped. 15 Q. -- your heart stopped? 16 A. Yeah. 17 Q. Okay. What were the names of some of the 18 other drug lines? 19 A. It was a lot of names of drug lines. I can't, 20 like, remember them all over there. They -- But you had 21 a lot of names. People get creative. 22 Q. All right. So was the CPR line, was that for 23 heroin? 24 A. Yeah.</p>	<p style="text-align: center;">Page 208</p> <p>1 jail. I know it wasn't me. 2 Q. Would Bryant and Elgen sell both heroin and 3 cocaine for you? 4 A. One would sell one, and the other would sell 5 the other. 6 Q. Okay. So they were interchangeable? 7 A. Yeah. 8 Q. Okay. So tell me other interactions that you 9 had with Watts or his team. You said you'd see them 10 every day, something -- words to that effect, right? 11 A. Yeah. 12 Q. Okay. And that's because they worked down 13 there, right? 14 A. If that's what you call work. 15 Q. And -- But you weren't arrested during those 16 times, right? 17 A. Because I wasn't out there doing nothing. 18 Q. Well, you were next arrested on 19 March 23, 2005, correct? 20 A. Yeah. 21 Q. Okay. So I want to focus on just -- I want to 22 go back to this time frame. Your case gets dismissed on 23 the Wednesday before Thanksgiving in 2004? 24 A. Yeah.</p>
<p style="text-align: center;">Page 207</p> <p>1 Q. What -- Did you have a name for your cocaine 2 line? 3 A. Well, we had knockout. 4 Q. I've heard that one. 5 A. I know you did. 6 Q. Did you call -- So you called your cocaine 7 knockout? 8 A. Yeah, when I was selling it. 9 Q. Did any -- Now, could only you use that name, 10 or could other people use it? 11 A. Only I could use it when I was selling. But 12 when I stopped selling, it's free enterprise. 13 Q. Okay. So how long did you use the term 14 "knockout" for your cocaine that you sold? 15 A. I don't know. I'm not sure. 16 Q. The cocaine that you -- 17 A. But I know it was still -- they was still 18 saying knockout when I stopped. Even while I was in 19 jail, they was still selling cocaine and calling it 20 knockout. So I was in jail. I know it wasn't me. 21 Q. Was the cocaine -- 22 A. They was -- 23 Q. Go ahead. Sorry. Go ahead. 24 A. They was still selling CPR while I was in</p>	<p style="text-align: center;">Page 209</p> <p>1 Q. Up to, let's say, March 22, 2005, at any time 2 during that time period, did you speak to any of the 3 officers on -- Strike that. 4 You've already talked about this conversation 5 that you had with Jones after your case was dismissed, 6 right? 7 A. Right. 8 Q. So from -- from that day -- which was late 9 November, early December 2004 -- up through 10 March 22, 2005, did you ever speak with any members of 11 Watts's team? 12 MR. TEPFER: Just object to the extent it 13 mischaracterizes the testimony. 14 But go ahead. 15 BY THE WITNESS: 16 A. Just not, like, actual conversations with 17 them. But they would say different things when they see 18 me. "Oh, you still out here? Oh, you don't learn," or 19 things of that nature. 20 Q. Who said that to you? 21 A. All of them. 22 Q. Who is all of them? 23 A. AJ, Watts. But Watts would just say it in 24 passing, like -- But AJ would stand there, like, with</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 210</p> <p>1 bravado. And Gonzalez would just look and he would say 2 different little things, like -- but it wasn't nothing 3 really threatening. But I don't know why, but it was 4 more so like Watts and AJ really just had it in for me 5 for some reason, because I refused to pay them to keep 6 selling drugs, I guess.</p> <p>7 Q. Well, is it your testimony that Alvin Jones 8 demanded money from you to sell drugs?</p> <p>9 A. He was part of the team.</p> <p>10 Q. No. Sir, my question is, did Alvin Jones 11 demand money from you to sell drugs?</p> <p>12 A. And my answer is that you was paying the team. You wasn't paying no one specific person. You would pay 13 the team. And I'm quite sure I'm not the only one that 14 would say that.</p> <p>15 Q. I'm just asking --</p> <p>16 A. I'm just -- I answered.</p> <p>17 Q. I'm asking you, did Alvin Jones ever demand 18 money from you to sell narcotics at Ida B. Wells?</p> <p>19 A. No. He never -- No.</p> <p>20 Q. Did any members of Sergeant Watts's team ever 21 demand money from you to sell illegal narcotics at 22 Ida B. Wells?</p> <p>23 A. Yeah. Sergeant Watts did.</p>	<p style="text-align: center;">Page 212</p> <p>1 were on?</p> <p>2 A. No. I believe that was terminated. I'm not 3 sure, though. But I believe that was terminated 4 unsatisfactorily. Or did they terminate it when I went 5 to jail? I know it was terminated, but I don't know 6 when, if it was when I got arrested in -- I think it was 7 while I was fighting the case. I'm not sure, though, 8 when it was terminated.</p> <p>9 Q. Okay. So is it your testimony that you don't 10 know one way or another whether or not you were on 11 probation on March 23, 2005?</p> <p>12 A. Right. That was my -- That's my -- Yes, 13 because I know I supposed to have two years of 14 probation, and I know it was supposed to have been like 15 a week or two left before the mailbox case. So they 16 kind of extended it. But I don't know if it was 17 terminated unsatisfactorily at the end of the mailbox 18 case or if it was terminated when I was sentenced 19 in 2006. I'm not sure. I don't -- as to the date that 20 it was terminated.</p> <p>21 Q. Who is Bebe?</p> <p>22 A. Gregory Young.</p> <p>23 Q. Is he a friend?</p> <p>24 A. Yes.</p>
<p style="text-align: center;">Page 211</p> <p>1 Q. I -- My question was, sir -- Let me ask it -- 2 I'm talking about his team. Did any members of 3 Sergeant Watts's team ever demand money from you to sell 4 drugs at Ida B. Wells?</p> <p>5 A. Sergeant Watts did.</p> <p>6 Q. Okay. But none of the -- his subordinates 7 did, correct?</p> <p>8 A. Personally, they never -- Well, I did have -- 9 Like, I started a conversation with Kallatt Mohammed. 10 But it was this guy named CK standing there. So I never 11 knew what that conversation was going to go to. But he 12 was like, "Man, it cost a lot of money to bond out and 13 pay lawyers." And then CK stood right there, and he 14 stopped talking and walked off. So I don't know the 15 extent of what that conversation would have went to. So 16 I don't know. But other than that ...</p> <p>17 Q. Other than Watts and then you started some 18 type of conversation with Mohammed, no other members of 19 the team ever demanded money from you --</p> <p>20 A. True.</p> <p>21 Q. -- to sell narcotics at Ida B. Wells, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. So let's talk about March 23, '05. Are 24 you still on this probation, that gang probation you</p>	<p style="text-align: center;">Page 213</p> <p>1 Q. Bebe sell drugs?</p> <p>2 A. He has.</p> <p>3 Q. What drugs did Bebe sell?</p> <p>4 A. I believe it was cocaine or heroin, one or the 5 other.</p> <p>6 Q. Where did Bebe sell cocaine or heroin out of?</p> <p>7 A. 527.</p> <p>8 Q. Bebe your age? younger? older?</p> <p>9 A. Older.</p> <p>10 Q. When is the last time you saw or spoke with 11 Bebe?</p> <p>12 A. Last time I saw Bebe, it was this year. I 13 know I seen him on 79th and Luella because he stay over 14 east. But I was on 79th and Luella. And him and his 15 son was in the car, and they pulled up. And then prior 16 to that, I saw him at his other son's funeral. And then 17 I saw him again, like, before the funeral. But other 18 than that, it's in spurts. You'll see him, and you 19 don't.</p> <p>20 Q. How did his son die?</p> <p>21 A. Overdose, I believe.</p> <p>22 Q. Is Bebe -- is or was a Gangster Disciple?</p> <p>23 A. No.</p> <p>24 Q. He was not?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 214	Page 216
<p>1 A. No.</p> <p>2 Q. Okay. I don't know if I asked you this</p> <p>3 before: Was Jamar Lewis a Gangster Disciple?</p> <p>4 A. I don't know. He never told me he was a</p> <p>5 Gangster Disciple.</p> <p>6 Q. How about Henry Thomas?</p> <p>7 A. He never told me either. That was never a</p> <p>8 conversation that we had.</p> <p>9 Q. Do you keep track of all the --</p> <p>10 A. No.</p> <p>11 Q. -- number of plaintiffs in the Watts</p> <p>12 Coordinated Pretrial Proceedings?</p> <p>13 A. No. Why would I do that?</p> <p>14 Q. Do you ever watch TV or you see them on TV</p> <p>15 talking about the case?</p> <p>16 A. Well, like everybody, I seen them on the news</p> <p>17 when they had a mass exoneration.</p> <p>18 Q. Yeah.</p> <p>19 A. When fifteen people got exonerated or</p> <p>20 something, I seen -- yeah, I seen the news. I seen the</p> <p>21 newspaper, as I'm sure you did.</p> <p>22 Q. So when you watch the news, do you see any of</p> <p>23 the individuals and you're watching TV and you say, "Oh,</p> <p>24 yeah, I remember him. He used to sell narcotics," or,</p>	<p>1 day it fell on. I don't know what I had for breakfast.</p> <p>2 I don't know who -- I don't know.</p> <p>3 Q. During 2005 -- Strike that.</p> <p>4 From January of '05 through March 22nd</p> <p>5 of 2005, were you selling heroin out of the 527</p> <p>6 building?</p> <p>7 A. I don't believe I was.</p> <p>8 Q. Same time period during 2005, were you selling</p> <p>9 cocaine out of the 527 building?</p> <p>10 A. I don't believe I was.</p> <p>11 Q. Were you selling cocaine or heroin anywhere in</p> <p>12 the city of Chicago or state of Illinois from</p> <p>13 January 1, 2005, through March 22, 2005?</p> <p>14 A. If I wasn't at 527, I wasn't selling drugs</p> <p>15 nowhere else.</p> <p>16 Q. You know, when your -- Clarissa and the kids</p> <p>17 live in the 527 building, why would you want to sell</p> <p>18 heroin and cocaine in the same building where you live</p> <p>19 with your wife and kids?</p> <p>20 MR. TEPFER: Objection: argumentative.</p> <p>21 Go ahead.</p> <p>22 BY THE WITNESS:</p> <p>23 A. I don't know. Hearing you say it, it don't</p> <p>24 make sense.</p>
<p style="text-align: center;">Page 215</p> <p>1 "Yeah, he was in the Gangster Disciples with me"? Do</p> <p>2 you ever see that?</p> <p>3 A. No.</p> <p>4 MR. TEPFER: Objection to the form of the question.</p> <p>5 BY MR. BAZAREK:</p> <p>6 Q. So what's the first thing you remember about</p> <p>7 March 23, 2005?</p> <p>8 A. That's my mother's birthday.</p> <p>9 Q. And what were the plans for your mom's</p> <p>10 birthday?</p> <p>11 A. I was going to take her to buy her something</p> <p>12 for her birthday.</p> <p>13 Q. What time?</p> <p>14 A. I don't know what time it was. But I got</p> <p>15 arrested, and she was downstairs.</p> <p>16 Q. Was it during the morning? afternoon? Do you</p> <p>17 know one way or another?</p> <p>18 A. I believe it was -- I believe it was</p> <p>19 after 12:00. I'm not sure, though.</p> <p>20 Q. Okay. Were the kids in school that day?</p> <p>21 A. I don't know.</p> <p>22 Q. Where was Clarissa that day?</p> <p>23 A. I think Clarissa was in the house. I'm not</p> <p>24 sure, though. March 23rd. I don't even remember what</p>	<p style="text-align: center;">Page 217</p> <p>1 Q. Yeah. Why wouldn't you go to another, like,</p> <p>2 building to sell narcotics out of?</p> <p>3 A. Because I wasn't living -- I wasn't from</p> <p>4 another building.</p> <p>5 Q. Did -- Would you need permission to sell</p> <p>6 narcotics at another building in Ida B. Wells?</p> <p>7 A. Probably.</p> <p>8 Q. Who would you get permission from?</p> <p>9 A. I guess --</p> <p>10 MR. TEPFER: Objection. Hold on. Objection:</p> <p>11 calls for speculation.</p> <p>12 Go ahead if you understand.</p> <p>13 BY THE WITNESS:</p> <p>14 A. I said I guess. So I don't know. It's</p> <p>15 whoever selling in that building, I guess. That's who</p> <p>16 you would say, "Look, I want to serve in here."</p> <p>17 Q. Did you need permission to sell narcotics out</p> <p>18 of the 527 building?</p> <p>19 A. No.</p> <p>20 Q. Do you know what a street tax is?</p> <p>21 A. What Watts was trying to get.</p> <p>22 Q. Okay. Any other -- Have you ever heard that</p> <p>23 term before, "street tax"?</p> <p>24 A. That's where I heard it from.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 218</p> <p>1 Q. Have you ever heard that where, say, you have 2 to pay money to the gang in order for you to sell 3 narcotics? Have you ever heard that? 4 A. Yeah. Back in the day, I have heard that. 5 Q. All right. 6 A. Yeah. 7 Q. During the times when you were selling 8 narcotics out of Ida B. Wells, who was the leader of the 9 Gangster Disciples? 10 A. It wasn't no leader of the Gangster Disciples. 11 They disbanded the Gangster Disciples in 1996. So you 12 was just affiliated with it. With the Gangster 13 Disciples, you was just affiliated. You didn't answer 14 to nobody. It wasn't ... 15 Q. Well, Larry Hoover was the chairman of the 16 board, right? 17 A. That's what they say. 18 Q. And do you know about the rankings in the 19 Gangster Disciples? 20 A. I'm telling you, in 1996, they arrested all 21 the people with the, what you're saying, rankings. They 22 arrested all them people. So it was every man for 23 themselves, I guess, after that. 24 Q. So before Larry Hoover was arrested, would the</p>	<p style="text-align: center;">Page 220</p> <p>1 A. That \$819 they put on there. 2 Q. Is that what you had? 3 A. Yeah. 4 Q. So the -- that money was inventoried, 5 ultimately? 6 A. I believe so. 7 Q. Okay. But the money you had that was 8 recovered from you, that was inventoried, right? 9 A. I believe so. 10 MR. TEPFER: Objection: asked and answered. 11 BY MR. BAZAREK: 12 Q. And it wasn't -- Any money -- Was it the same 13 amount that was inventoried that you had with you? 14 That's my question. 15 MR. TEPFER: Bill, you keep cutting me off when I'm 16 making my objections. You gotta wait for me to finish 17 my objection. So ask that question again. 18 MR. BAZAREK: Go ahead. 19 THE REPORTER: Yeah. I'll need a moment. Sorry. 20 (Record read as requested.) 21 MR. TEPFER: Objection: asked and answered. 22 Go ahead. 23 BY THE WITNESS: 24 A. I don't know.</p>
<p style="text-align: center;">Page 219</p> <p>1 drug dealers have to pay, like, a street tax? 2 A. I couldn't speak to that. I don't know. I 3 was in jail when they got locked up. So I don't know. 4 Q. Okay. Have you ever met Larry Hoover? 5 A. No, no. 6 Q. Do you have any friends who were governors in 7 the Gangster Disciples? 8 A. No. 9 Q. Did any of your friends ever -- who were in 10 the Gangster Disciples ever get murdered? 11 A. Not that I -- Well, I had one friend got 12 killed. And I was in jail when that happened. But that 13 was over a girl. So I -- 14 Q. Okay. So let's talk about your mom's birthday 15 on March 23rd. So you were going to go shopping with 16 her? 17 A. Yeah. I was just going to go and buy her 18 something. 19 Q. And -- 20 A. She can't complain about the gift if she there 21 when you buy it. 22 Q. Did you have any money with you that day? 23 A. Yeah. 24 Q. How much money did you have?</p>	<p style="text-align: center;">Page 221</p> <p>1 Q. I'm -- Did you have, like, say, a thousand 2 dollars with you? 3 A. I could have. I could have. 4 Q. 2,000? 5 A. I could have. 6 Q. 3,000? 7 A. I don't know if it was -- I don't know. 8 Q. Where did you get the money from? 9 A. I gambled. I shot dice. I did a lot of 10 stuff, played the lottery, played cards. 11 Q. Sold dope? 12 A. Not at that time. 13 Q. So you actually remember playing cards, 14 shooting dice to have that money? 15 A. Yeah. I did it every weekend. 16 Q. Okay. I mean, you certainly -- 17 A. Saturday and on Sunday. 18 Q. You weren't working -- 19 A. Right. 20 Q. -- in 2005, correct? 21 A. Correct. 22 Q. Okay. All right. At some point you get 23 hungry, and you want to get some nachos from Winky? 24 A. I have gotten nachos from Winky.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 222</p> <p>1 Q. Was that -- Is that what you did on 2 March 23rd? 3 A. I'm not sure. Maybe at some point -- 4 Q. All right. Tell me what you remember -- 5 A. -- during that day. 6 Q. Tell me what you remember about March 23rd 7 when you first came into contact with any police 8 officer. 9 A. I remember coming downstairs -- 10 Q. Where were you coming from? 11 A. That's what I don't remember, whether it was 12 Winky's house or whether it was Mika's house. I was 13 coming down the stairs. And when I passed the fourth 14 floor and coming down to the third floor -- 15 Q. What building are you in? 16 A. 527. And as I'm coming down the stairs, when 17 I get to like the fifth or fourth step from the bottom 18 to land on the third-floor landing, that's when 19 Officer Nichols stepped out the hallway. But Bebe and 20 Twany (phonetic) was in the hallway. 21 Q. When did you first see Bebe? 22 A. As I'm coming down the stairs, I see Bebe and 23 Twany right there. 24 Q. Was that the first time you saw them that day?</p>	<p style="text-align: center;">Page 224</p> <p>1 Q. Did Twany ever sell narcotics for you? 2 A. I don't know. He probably served for somebody 3 that was selling for me. I don't know. 4 Q. All right. The people that would sell for 5 you, they would enlist other individuals to help with 6 the narcotics sales? 7 A. Depending on what they was doing that day, I 8 guess they would. 9 Q. Yeah. Do you know the names of any of the 10 people who would have -- you know, your sellers, the 11 ones on your payroll, who they would have hired to work 12 for them? 13 A. No. 14 Q. Okay. Did Twany or Bebe have any narcotics 15 with them when you saw them? 16 A. Yeah. They both had a bag in their hand. 17 Q. What did Twany have in his hand? 18 A. I believe Twany had cocaine. 19 Q. Bebe had heroin? 20 A. Yes. 21 Q. And do you see them with the narcotics before 22 you see Officer Nichols? 23 A. Yeah, because I'm coming down the stairs and 24 they standing right -- right there on the third-floor</p>
<p style="text-align: center;">Page 223</p> <p>1 A. I can't say that's the first time I saw them 2 that day. I don't know. 3 Q. Did Bebe or Twany ever sell narcotics for you? 4 A. Well, Bebe have, like, maybe worked a bundle. 5 But, like, he wasn't, like, somebody, like, was on my 6 payroll. He probably worked a bundle or so. 7 Q. When you say "worked a bundle," what does that 8 mean? 9 A. The bags that was in each -- in a particular 10 bag. Like, you had the individual bags. So it might 11 have been 25 individual bags in one plastic bag. And he 12 might have been what they call sick or illing and he 13 needed a blow or something and he didn't have the money 14 for it. So, "Pops, let me work a bundle, get my ill 15 off." 16 Q. Okay. And have you ever used the term 17 "wake-up call"? 18 A. That's what it's -- That's what it's called, I 19 guess. 20 Q. Okay. 21 A. Getting your ill off or wake up or ... 22 Q. And then what about Twany? 23 A. I don't know who Twany was working for. But 24 he was there.</p>	<p style="text-align: center;">Page 225</p> <p>1 landing. And as I get to like the fourth step, fourth 2 or fifth step from the bottom, that's when Nichols step 3 out the hallway with his gun drawn, and he's like, 4 "Y'all come out the hallway." 5 Q. He's calling all three of you? 6 A. Yeah. Like, "Y'all come out." I'm like, 7 "Damn. I'm coming down the stairs." He said, "Y'all 8 come out of the stairwell into the hallway." So we went 9 into the hallway. He told us to put our hands on the 10 wall. We put our hands on the wall. Then Bebe looked 11 and ran. 12 Q. What did Bebe do with the heroin that he had? 13 A. I don't know. He might have threw it down. 14 But I know I ran when he -- After he ran, I ran. And 15 when I got down to the second floor, Bebe was right 16 there, and he was looking. So I said, no, I ain't going 17 to go right there with him. I'm going to go on down the 18 stairs. And I went on down to the first floor. And I 19 was finna go out the building. And then Manny came 20 through the doorway. And he put his hand up, and I 21 stopped. 22 Q. Now, what happened to Twany? 23 A. He was still up there with Nichols. 24 Q. So Twany didn't run?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 226</p> <p>1 A. No. Twany was closest to Nichols. So I guess 2 when we ran, he probably grabbed him. I don't know. 3 Q. What did Twany do with the cocaine? 4 A. I don't know. I guess Nichols got it from him 5 because he put it on me. 6 THE VIDEOGRAPHER: Mr. Baker, if you could lower 7 your hand. 8 THE WITNESS: (Complying.) 9 THE VIDEOGRAPHER: Thank you. 10 BY MR. BAZAREK: 11 Q. Did you ever talk to Twany about 12 March 23, 2005? 13 A. I don't even -- I don't know when the last 14 time I seen Twany. So I don't know. 15 Q. Is he alive or dead? 16 A. I'm not sure. I haven't seen him. 17 Q. So did Twany ever discuss with you at any time 18 the events of March 23, 2005? 19 A. No. I don't believe. I don't recall him -- 20 Q. The cocaine that you saw Twany with, did you 21 ever see it again that day? 22 A. Yeah. 23 Q. Where? 24 A. In Nichols' hand.</p>	<p style="text-align: center;">Page 228</p> <p>1 A. Well, the heroin was in a powder form, you 2 know, and cocaine was rocked. So ... 3 Q. What did Nichols say when you saw him 4 approaching and he had the cocaine and the heroin in his 5 hand? 6 A. He said, "Yeah, that's him. He ran from me." 7 Q. And what else did he say? 8 A. Nothing that I can remember. I know he put 9 the cuffs on me and put me in the -- they put me in the 10 police car. And they got in the police car. And then 11 Clarissa came down, and she was like, "What? What he 12 going to jail for?" He was like, "He fucking ran from 13 me." 14 Q. Who said that? 15 A. Nichols. And then he backed up, and he made a 16 phone call. And by the time we got to the end of the 17 fire lane to get out onto Browning, AJ and Watts pull 18 up. And then AJ got out the car. Nichols went to talk 19 to Watts. AJ come around to the door where I'm at, open 20 it, and say, "I told you we was going to get you." Then 21 he shut the door as I was saying, "Yeah. But get me the 22 right way. Don't do this same bullshit." 23 Q. Did Officer Jones say anything back to that? 24 A. No. He shut the door and was gone back to the</p>
<p style="text-align: center;">Page 227</p> <p>1 Q. And where was -- Where did you first see 2 Nichols having that cocaine in his hand? 3 A. When I was standing there with Manny. After 4 Manny had searched me, Nichols came out the hallway. 5 And Nichols said, "Yeah, that's him." And they put the 6 cuffs on me and took me to the car. 7 Q. So Nichols approaches you and Officer Leano, 8 and Nichols has the cocaine that Twany had? 9 A. He got the cocaine and he got some heroin in 10 his hand. He had two bags in his hand. 11 Q. Okay. 12 A. That he say he got one out my hand and one out 13 my pocket. If Manny would have saw me with drugs, he 14 would have already put the handcuffs on me, and he would 15 have had the drugs. 16 Q. So the heroin that you saw Officer Nichols 17 with, that was the heroin that Bebe had? 18 A. Had to be. 19 Q. And it looked the same type of packaging? 20 A. From what I saw, it was in a bag. 21 Q. How did you know it was heroin? 22 A. Because I sold heroin before. 23 Q. There's, like, a certain color to heroin 24 versus cocaine?</p>	<p style="text-align: center;">Page 229</p> <p>1 car. 2 Q. So you agree you were already under arrest by 3 the time Sergeant Watts and Officer Jones arrived, 4 correct? 5 MR. TEPFER: Objection. Sorry. Objection: calls 6 for a legal conclusion. 7 BY THE WITNESS: 8 A. I was -- I was in the police car with 9 handcuffs on. But I wasn't Mirandized to say "You're 10 under arrest." 11 Q. Okay. Did you hear anything at any time -- Or 12 strike that. 13 Did you ever observe Officer Nichols on that 14 day speak to Watts or Jones? 15 A. Yeah. They was at the car talking. And me 16 and Leano was in the car. 17 Q. What was -- 18 A. After AJ -- I don't know what they said. 19 But -- because I was in the car with the windows up. 20 After AJ left from the car talking -- saying what he 21 said to me, and then he went over there where Nichols -- 22 and Watts was at. So I wasn't privy to their -- 23 Q. Okay. 24 A. -- conversation.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 230</p> <p>1 Q. So you couldn't hear anything that they were 2 saying, correct? 3 A. Right, right. 4 Q. Okay. And then did Officer Leano say anything 5 at any time that day? 6 A. No. 7 Q. Did you say -- 8 A. Other than "Stop" when he -- (gesturing). 9 That's basically all he said. 10 Q. Did you say anything to Officer Leano? 11 A. No. 12 Q. Who took you to the police station? 13 A. Leano and Nichols, Douglas Nichols. 14 Q. Did they say anything to you in the car going 15 to the police station? 16 A. Wasn't nothing for me to say to them. No, not 17 that I can recall. But that's what I don't understand. 18 If it's them that arrested me, why did Gonzalez testify 19 on the stand? He wasn't there. 20 Q. At any time on March 23, 2005, did you see 21 Officer Gonzalez? 22 A. That day? 23 Q. Yes. 24 A. At the police station.</p>	<p style="text-align: center;">Page 232</p> <p>1 A. I don't know. They was -- Well, I was 2 handcuffed to the wall. And it was a group of them, 3 like, adding stuff to the report. They worked as a team 4 to fill out the report. 5 Q. Who? 6 A. The team. 7 Q. Who do you remember? 8 A. All the officers under Watts. 9 Q. Well, you said Nichols and Leano were at the 10 scene, right? 11 A. Yeah, they were at the scene. 12 Q. They took you to the police station? 13 A. They -- Yes. 14 Q. You said Alvin Jones -- 15 A. Yeah. He pulled up, him and Watts, later on. 16 Q. -- and Watts were at the scene? 17 A. Yeah. And the rest of them, when we got to 18 the police station, was there. 19 Q. Well, when you say the rest of them, you said 20 you saw Gonzalez there, right? 21 A. Yeah. 22 Q. Who else? 23 A. I'm not sure. But I know I saw Gonzalez 24 there. I think I saw Bolton there. I would say I saw</p>
<p style="text-align: center;">Page 231</p> <p>1 Q. I want to go back. You said that Clarissa 2 came down? 3 A. Yeah. 4 Q. Did you speak with Clarissa? 5 A. I was in the back of the police car. I 6 couldn't speak to Clarissa. 7 Q. Did -- Do you know how it was that Clarissa 8 became aware of what was going on and then she came 9 down? 10 A. She probably was looking out the window like 11 she always do. 12 Q. Did you -- Did Clarissa say anything? 13 A. "What he going to jail for?" 14 Q. And what did you say? 15 A. I didn't say nothing. I was in the back of 16 the police car. 17 Q. Did anyone say anything to Clarissa? 18 A. Nichols said, "He ran from me. His ass going 19 to jail." 20 Q. Was anything else said between Clarissa and 21 any other officer? 22 A. Not that I could hear, no. 23 Q. At the station, did you speak with any police 24 officer?</p>	<p style="text-align: center;">Page 233</p> <p>1 Bolton there because him and Gonzalez rode together a 2 majority of the times. 3 Q. All right. But are you guessing, or you 4 actually remember seeing Bolton there? 5 A. I said I think I saw Bolton there. 6 Q. Anyone else? 7 A. I don't know. I don't know. 8 Q. Did you speak to any officer once you got to 9 the police station? 10 A. Yeah. I was ranting and raving about "This is 11 some bull." But, like, they didn't acknowledge it. 12 Q. Did any officer say anything to you at the 13 police station? 14 A. That time? 15 Q. Yes. 16 A. I don't know. I don't recall. 17 Q. Okay. How about did Watts say anything at the 18 police station? 19 A. I don't know. 20 Q. Okay. Did Clarissa come to the police 21 station? 22 A. I wouldn't know because she -- it ain't like 23 she could just come to the back and see about me. So if 24 she did come, she would have had to stop at the desk up</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 234	Page 236
<p>1 front. So I don't know.</p> <p>2 Q. How long did it take for the paperwork to be completed?</p> <p>3 MR. TEPFER: Objection: calls for speculation.</p> <p>4 Go ahead.</p> <p>5 BY THE WITNESS:</p> <p>6 A. I don't -- I don't know how long it took for 7 them to finish the report. I don't know.</p> <p>8 Q. All right. But do you remember who -- was anyone taking the lead in terms of filling out the paperwork?</p> <p>9 A. I don't know who took the lead. I think 10 Gonzalez had started on the paperwork, and then they was 11 just, "Put this. Put this." Like, AJ was saying, "Put 12 this. Put this." I believe Watts said something. But 13 I'm not sure that time.</p> <p>14 Q. When you say Officer Jones said, you know, "Put this," what did Officer Jones say?</p> <p>15 A. I don't know. He was like, "Word it -- Reword 16 that." That's what he was saying. "Reword that."</p> <p>17 Q. Who was he saying that to?</p> <p>18 A. To Gonzalez. So I don't -- I wasn't privy to 19 what was actually on the report.</p> <p>20 Q. Did Officer Jones say anything other than that</p>	<p>1 A. Yeah. But I don't know what he was telling 2 him to reword because it wasn't like they was reading it 3 out loud.</p> <p>4 Q. Okay. Other than that, anything else occur during the time that Gonzalez was filling out the report?</p> <p>5 A. I'm not sure. I don't know what you speaking 6 to. I don't -- I just --</p> <p>7 Q. What happened next?</p> <p>8 A. The next thing I remember is being put in 9 lockup.</p> <p>10 Q. Who brought you to lockup?</p> <p>11 A. I don't recall that either.</p> <p>12 Q. And then right from lockup, at some point you had to be taken before a judge?</p> <p>13 A. Yeah. I went to 51st -- Well, not 51st. I 14 was at 51st. Went to 26th and California in the -- I 15 don't know what they call it -- but the transporter. 16 They transported us. It go from police station to 17 police station and get you to bond court or whatever the 18 next -- you know, well, to 26th and California.</p> <p>19 Q. Did you see Bebe or Twany at the police station?</p> <p>20 A. No.</p>
<p style="text-align: center;">Page 235</p> <p>1 to Gonzalez at the police station?</p> <p>2 A. I don't know because, like, they was all 3 huddled around each other. So I don't know if he said 4 something else. But they were all talking. The 5 officers were talking, doing the report. So I took that 6 to mean that they was -- Since he said, "Reword that," I 7 took it to mean that they was just ad-libbing.</p> <p>8 Q. But you don't -- Strike that.</p> <p>9 Anything else happen during the time when the report or reports are being filled out?</p> <p>10 A. I don't know what you saying. I don't ...</p> <p>11 MR. TEPFER: Object to form.</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. Well, okay. You said that there's -- other officers are at the station, report is being filled out, you said, by Gonzalez, right?</p> <p>14 A. He was the one typing, yes.</p> <p>15 Q. Did you ever see anyone other than Gonzalez actually typing out the report?</p> <p>16 A. No.</p> <p>17 Q. Okay. And then you said Officer Jones would say, "Put this. Put that," right?</p> <p>18 A. Like, "Reword that."</p> <p>19 Q. Reward -- Reward it?</p>	<p style="text-align: center;">Page 237</p> <p>1 Q. After you were taken to court for the very first time after the March 23, 2005, arrest, when would have been the next time you were not in custody?</p> <p>2 A. I don't know because I believe I bonded out 3 from that, I believe. So I don't know, like, when I 4 actually -- Like, I don't think I stayed there that 5 long. I'm not sure.</p> <p>6 Q. Who put the bond up for you?</p> <p>7 A. Probably Clarissa. I don't know. I don't 8 know. Or -- I don't know. Or if that was when 9 Dave Navarro stepped in. I'm not sure, like, as to -- I 10 just know I got bonded out, I guess.</p> <p>11 Q. And then when you bonded out, were there conditions of your bond you were supposed to follow?</p> <p>12 A. Not that I can recall.</p> <p>13 Q. You know, when you bond out, for instance, you sign a piece of paper, and it says you're not going to engage in criminal activity, that type of thing?</p> <p>14 A. I mean, probably. I'm not sure.</p> <p>15 Q. Okay. After you bonded out, did you go see Bebe and Twany?</p> <p>16 A. No.</p> <p>17 Q. Why not?</p> <p>18 A. For what? They didn't put me in jail.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 238	Page 240
<p>1 Q. You actually went to trial on the 2 March 23, 2005, arrest, correct? 3 A. Yes. 4 Q. And you were found guilty, correct? 5 A. Yes. 6 Q. Who was the judge who found you guilty? 7 A. Toomin, Judge Toomin. 8 Q. And that was a bench trial? 9 A. Yes. 10 Q. And so -- And you were there for the entire 11 trial, right? 12 A. What you mean? 13 Q. You were there for the whole trial? 14 A. You mean I showed up, came to court? 15 Q. Yes. 16 A. Yes. 17 Q. Why didn't you call Twany and Bebe as 18 witnesses? 19 MR. TEPFER: Objection. You can answer his 20 question as long as -- Well, all right. Just go ahead. 21 I'll strike my objection. You can answer the question. 22 BY THE WITNESS: 23 A. It just never came up. I don't believe they 24 would have came anyway because Bebe was still using</p>	<p>1 Sergeant Watts's team? 2 A. Well, between that time is when Mohammed had 3 started that conversation. But we never finished that 4 conversation because CK came and stood right there. So 5 we never finished that conversation. But other than 6 that, it was just in passing if they got people 7 downstairs or if they around and I'm just going past. 8 But, no, not to be, like, conversations. No. 9 Q. All right. So they weren't -- No one on the 10 team was harassing you during that time period, correct? 11 A. I mean, shit, they had already arrested me. I 12 was already fighting a case. So really wasn't no need 13 for that. 14 Q. Yeah. I'm just saying, from the time you 15 bonded out through December 10, 2005, were you harassed 16 by any member of Sergeant Watts's team? 17 A. I don't know. 18 Q. Were you threatened during that same time 19 period by any member of Sergeant Watts's team? 20 A. I don't know what you consider a threat. I 21 mean, if they standing here in the doorway, you 22 couldn't -- I couldn't walk through the doorway until 23 they felt the need to move. So I guess that could have 24 been considered as intimidation. If somebody -- one of</p>
<p style="text-align: center;">Page 239</p> <p>1 drugs, like, heavy. So what type of witness would he 2 have been? And Twany, I can't recall the last time I 3 seen Twany. So I don't know. 4 Q. And that trial occurred in 2006, right? 5 A. Yes. 6 Q. And you were represented by a Mr. Mahoney? 7 A. Yes. 8 Q. All right. So let's now talk about the time 9 period, Mr. Baker, from the time you bond out following 10 the March 23rd arrest up to December 10, 2005. I want 11 to focus on that time frame. Okay? 12 A. Mm-hmm. 13 Q. Because, you know, I know you and Clarissa 14 were arrested on December 11, '05, right? 15 A. If that was a Sunday and the Bears was 16 playing, yes, we were. I don't know the actual date. 17 But, yeah. 18 Q. So I want to -- Did you have interactions with 19 any members of Sergeant Watts's team from the time you 20 bonded out -- and I'm not talking about when you're 21 at -- No. Strike that. 22 From the time you bonded out following your 23 March 23, 2005, arrest through December 10, 2005, did 24 you have any interactions with any member of</p>	<p style="text-align: center;">Page 241</p> <p>1 my family members come into the building to visit us in 2 the apartment during that time, they would always get 3 accosted downstairs, searched and all that. I mean, so, 4 yes, I felt that was harassment. 5 Q. Who harassed you during that time period from 6 the time you bonded out through December 10, 2005? 7 A. Watts. 8 Q. Anyone else? 9 A. Like I said, depending on what you consider 10 threats or intimidation. Like, I couldn't just move 11 them out their space and walk past. I had to wait. If 12 they look and see it was me, then it would take that 13 much longer for them to move for me to leave and go 14 past. So it depend on your term- -- or my terminology 15 of threats and intimidation. I took that as 16 intimidation, a form of intimidation. 17 Q. From who? 18 A. Watts and AJ. Them really was the ones that 19 just had a -- I would say a hard-on for me. 20 Q. How did -- How did Officer Jones intimidate 21 you during the time period of the time you bonded out 22 through December 10, 2005? 23 A. I just told you, he would stop my progression. 24 I couldn't just walk freely through the building. If --</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 242	Page 244
<p>1 Either you going to go around, or you're going to wait 2 for him to decide to move. I took that as a form of 3 intimidation.</p> <p>4 Q. Did Jones detain you at any time during that 5 time period?</p> <p>6 A. That -- I felt that was detaining.</p> <p>7 Q. I'm asking you, did Jones detain you?</p> <p>8 A. I said I felt that was detaining.</p> <p>9 Q. Were you put in handcuffs?</p> <p>10 A. No.</p> <p>11 Q. Were you put in a police car?</p> <p>12 A. I wasn't always put in handcuffs or a police 13 car and was detained.</p> <p>14 Q. Were you put -- Strike that.</p> <p>15 Were you taken to the police station?</p> <p>16 A. No.</p> <p>17 Q. Were you taken to the substation?</p> <p>18 A. No.</p> <p>19 THE VIDEOGRAPHER: Mr. Baker.</p> <p>20 THE WITNESS: Oh, I'm sorry.</p> <p>21 THE VIDEOGRAPHER: Maybe if you could give me one 22 of these. Thanks.</p> <p>23 THE WITNESS: Okay.</p> <p>24</p>	<p>1 Q. -- move -- 2 A. Like -- Yeah.</p> <p>3 Q. -- was anyone with you during that time? 4 A. No. I walked by myself.</p> <p>5 Q. All right. Let's talk about December 11, '05. 6 What do you remember about that day?</p> <p>7 A. I remember the Bears was playing. And 8 Clarissa had went to take a moving truck back because 9 they had moved -- cleared their father's stuff out of 10 the house in Olympia Fields. So she went to take a 11 moving van back. And then her brother dropped her off 12 at her cousin -- well, her auntie's house, Helen. And I 13 guess she stayed there for a while. Then she called me 14 to come and pick her up from Helen's house.</p> <p>15 Q. What kind of car did you have at that time? 16 A. I don't know what kind of car I had. I think 17 I was -- I think we had -- I don't know. But I know on 18 that day, I was in Clarissa's car. She had a Jimmy, 19 GMC Jimmy, four-door.</p> <p>20 Q. Is that an SUV? a Jeep? What is it? 21 A. Yeah, I guess it would be considered as an 22 SUV. But it was old, like them -- the old Blazers.</p> <p>23 Q. What color was it? Do you remember? 24 A. Like, brownish, like the color of your pants.</p>
Page 243	Page 245
<p>1 BY MR. BAZAREK:</p> <p>2 Q. So other than Officer Jones -- and now I'm 3 talking about subordinates to Sergeant Watts -- did any 4 other subordinate on the team intimidate or threaten 5 you?</p> <p>6 A. No.</p> <p>7 Q. And the intimidation and threats that you 8 perceived were that Jones would be standing near an area 9 where you were?</p> <p>10 A. No. He would be blocking areas. Like, if 11 I'm -- If I leave out my house to come out and if they 12 in the hallway, I couldn't just proceed past. I had to 13 either wait for him to move out the way, or I had to go 14 around. I couldn't just go this way. Him and Watts.</p> <p>15 Q. During that time period from the time you 16 bonded out through December 10, 2005, did Jones ever say 17 anything to you?</p> <p>18 A. I don't know.</p> <p>19 Q. Did you ever hear anything that Jones said to 20 anyone?</p> <p>21 A. I don't know.</p> <p>22 Q. When you say that Jones would be, you know, 23 blocking your ability to --</p> <p>24 A. Maneuver past.</p>	<p>1 Q. And that was -- that was the vehicle that 2 Clarissa drove?</p> <p>3 A. Yes.</p> <p>4 Q. And did you have --</p> <p>5 A. But I was driving that day.</p> <p>6 Q. Did you also have your own vehicle?</p> <p>7 A. I don't recall. I think I had a Chevy. But I 8 think at that time my keys was lost and I couldn't get 9 into the Chevy or something. So I believe I was driving 10 her car.</p> <p>11 Q. What color was your Chevy?</p> <p>12 A. At that time, it was white.</p> <p>13 Q. Do you remember what kind of Chevy it was?</p> <p>14 A. I believe it was a Caprice.</p> <p>15 Q. Did you ever change the colors or paint the 16 car different colors?</p> <p>17 A. Yes.</p> <p>18 Q. What were the -- When you first got it, what 19 was the color?</p> <p>20 A. It was white when I first got it.</p> <p>21 Q. And then you painted it, had it painted?</p> <p>22 A. Yes.</p> <p>23 Q. What color?</p> <p>24 A. Well, they -- I was trying to get a burgundy.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 246</p> <p>1 But they painted it red. So I had to leave it there. 2 And then they -- I can't emulate the color. But I guess 3 it was like a dark, like, champagne or something. I 4 mean ... 5 Q. Okay. Now, on December 11, '05, you're out on 6 bond for the March 23rd case, right? 7 A. Right. 8 Q. Are you on any type of probation at that time? 9 A. I don't think so. I'm not sure. But I don't 10 think so. 11 Q. But you certainly knew that when you're out on 12 bond, you shouldn't engage in narcotics activity, right? 13 A. Right. 14 Q. And you knew it was wrong if you would have 15 had narcotics inside of a vehicle that you were inside, 16 correct? 17 A. If I would have had it, yeah. 18 Q. And so you couldn't use your car that day 19 because you lost your key? 20 A. Yeah. The key was -- I lost the key in the 21 snow. So I couldn't find it. So my idea was to wait 22 for the snow to melt. 23 Q. When did you lose the key in relation to 24 December 11?</p>	<p style="text-align: center;">Page 248</p> <p>1 went to pick up Clarissa to bring her home? 2 A. I think it was -- I left, it was around the 3 second quarter, I believe, or it might have been the end 4 of the first quarter. But the game was on when I went 5 and got her. 6 Q. And were all the kids home? 7 A. Yes. 8 Q. Anyone else inside the apartment other than 9 you and your three boys? 10 A. No. 11 Q. What time did Clarissa first leave the 12 apartment? 13 A. She left early. She might have left 14 8:00 something, maybe 9:00. 15 Q. You know, on that morning, did you ever leave 16 the house? 17 A. Yeah. I -- Yeah. I would go downstairs and 18 ask somebody to go get me a coffee from Dunkin' Donuts. 19 Q. What do you mean you asked someone to get you 20 a coffee? 21 A. I used to pay people to go get me -- get the 22 coffee so I wouldn't have to go. 23 Q. Where was the Dunkin' Donuts at? 24 A. Like a block away in Lake Meadows.</p>
<p style="text-align: center;">Page 247</p> <p>1 A. I'm not sure. But I know I didn't have it. 2 So I had been driving Clarissa's car that day. 3 Q. Well, were you without the use of your 4 vehicle, the Chevy, for how long of a time period? 5 A. I don't recall how long of a time period. But 6 I do know, like, one of the guys, Corey, had found the 7 key later on, so -- once the snow melted some. But this 8 was after December 11. 9 Q. Did you ever let people use your car to sell 10 narcotics? 11 A. No. But I did let guys drive it, but not to 12 sell narcotics. 13 Q. What if you needed to get narcotics from your 14 supplier? How would you get it? 15 A. They would bring it to me. 16 Q. The supplier would bring it to the 527 17 building? 18 A. Yeah. 19 Q. All right. So Clarissa is busy that Sunday, 20 right? And you're home, but you have access to her car, 21 right? 22 A. Yes. I told you she went to take the moving 23 van back. So she drove that. 24 Q. And then when you -- what time was it that you</p>	<p style="text-align: center;">Page 249</p> <p>1 Q. All right. So you were in the lobby that 2 morning? 3 A. I went down there, yeah. 4 Q. Who was selling narcotics in the 527 building 5 that day? 6 MR. TEPFER: Objection. 7 THE WITNESS: I really don't -- 8 MR. TEPFER: Hold on. Mischaracterizes the 9 testimony. 10 But go ahead and answer. 11 BY THE WITNESS: 12 A. I really don't know. 13 Q. Well, it's your testimony -- Strike that. 14 During December of 2005, did you engage in any 15 narcotics activity at Ida B. Wells? 16 A. Not that I recall. 17 Q. During March of 2005, did you engage in 18 narcotics activity at Ida B. Wells? 19 A. No. 20 Q. Do you remember anyone who you were with in 21 the lobby of the 527 building on December 11, 2005? 22 A. I don't recall. It was a long time ago. But 23 I know it was a lady named -- Joanne, was it? -- either 24 Joanne or Nina that went and got the coffee for me.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 250	Page 252
<p>1 Q. Was Elgen Moore there?</p> <p>2 A. Not that I recall, no.</p> <p>3 Q. What about Patrick?</p> <p>4 A. No.</p> <p>5 Q. So if you weren't engaging in narcotics</p> <p>6 activity during the month of December 2005, what would</p> <p>7 Patrick and Elgen do for work?</p> <p>8 MR. TEPFER: Objection: calls for speculation.</p> <p>9 If you know, you can answer.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't know.</p> <p>12 Q. Did they go to work for another drug dealer?</p> <p>13 A. I don't know.</p> <p>14 Q. Well, let me ask you this: From like</p> <p>15 March of '05 through December of '05, did you ever</p> <p>16 observe Elgen or Patrick engaging in narcotics activity</p> <p>17 at Ida B. Wells?</p> <p>18 A. I can't say that I did. Well, I did see Elgen</p> <p>19 sell marijuana. But other than that, I can't say that I</p> <p>20 did.</p> <p>21 Q. And he was selling that for someone else, not</p> <p>22 you, right?</p> <p>23 A. He was selling marijuana for him.</p> <p>24 Q. Okay.</p>	<p>1 A. Walk. I stayed on the second floor.</p> <p>2 Q. Okay. Go ahead. You were going to say</p> <p>3 something.</p> <p>4 A. Nothing.</p> <p>5 Q. And Clarissa is gone by this point?</p> <p>6 A. Yes.</p> <p>7 Q. All right. So you got your coffee, and then</p> <p>8 what do you do?</p> <p>9 A. I go back upstairs.</p> <p>10 Q. All right. Bear game is not on until --</p> <p>11 A. Right. Until 12:00.</p> <p>12 Q. -- 12:00?</p> <p>13 A. Yeah.</p> <p>14 Q. So what did you do after you got back to your</p> <p>15 apartment?</p> <p>16 A. I played a game.</p> <p>17 Q. Do you remember what game it was?</p> <p>18 A. Madden.</p> <p>19 Q. What did you do next?</p> <p>20 A. I played the game, drank my coffee, and waited</p> <p>21 for Clarissa to call.</p> <p>22 Q. Did you make any phone calls to anyone that</p> <p>23 day, or did you receive any phone calls that day?</p> <p>24 A. I don't -- I don't recall that. I don't know.</p>
<p style="text-align: center;">Page 251</p> <p>1 MR. TEPFER: When was our last break?</p> <p>2 THE VIDEOGRAPHER: I think it was at around -- we</p> <p>3 went back on about 3:30.</p> <p>4 MR. TEPFER: Okay. You okay?</p> <p>5 THE WITNESS: Yeah.</p> <p>6 BY MR. BAZAREK:</p> <p>7 Q. So you get your Dunkin' Donuts coffee from</p> <p>8 Nina?</p> <p>9 A. Or Joanne. It was one or the other.</p> <p>10 Q. Okay.</p> <p>11 A. That's who used to go for me.</p> <p>12 Q. And do you know about what time it was?</p> <p>13 A. I figured it was 9:00 something because it</p> <p>14 was, like, after Clarissa had left. So it was early</p> <p>15 enough for me to drink coffee as opposed to being later</p> <p>16 in the day.</p> <p>17 Q. And how much time did you spend in the lobby?</p> <p>18 A. Until she came back. So that might have been</p> <p>19 like twelve minutes.</p> <p>20 Q. Okay. So you just -- you went to the lobby,</p> <p>21 had someone get you coffee, and then you went back</p> <p>22 upstairs?</p> <p>23 A. Yeah. And then --</p> <p>24 Q. And would you take the elevator or walk?</p>	<p style="text-align: center;">Page 253</p> <p>1 I know I received a call from Clarissa saying she wanted</p> <p>2 me to come pick her up from her auntie's house.</p> <p>3 Q. Do you remember what time that was?</p> <p>4 A. No. But I know it was toward the end of the</p> <p>5 first quarter or the beginning of the second quarter of</p> <p>6 the Bears game.</p> <p>7 Q. All right. So what time did you leave your</p> <p>8 apartment to get Clarissa?</p> <p>9 A. I don't recall the exact time that I left to</p> <p>10 go get Clarissa, but I know it was after 12:00.</p> <p>11 Q. Okay. And then what was the address that you</p> <p>12 were going to get Clarissa at?</p> <p>13 A. I don't know the exact address. But I know it</p> <p>14 was, like, on Prairie, like -- I believe, like, 58th and</p> <p>15 Prairie, somewhere up in there. But I'm not quite sure.</p> <p>16 But it was on Prairie, 50 something and Prairie.</p> <p>17 Q. And it would be south?</p> <p>18 A. Yes.</p> <p>19 Q. All right. So not too far from where you</p> <p>20 lived, right?</p> <p>21 A. No. Once I got up King Drive, (verbally</p> <p>22 indicating).</p> <p>23 Q. Did you stop anywhere on your way to pick up</p> <p>24 Clarissa?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 254	Page 256
<p>1 A. No.</p> <p>2 Q. How -- I didn't ask you this question: At the 3 time in December of 2005, how old were the boys?</p> <p>4 A. School age, elementary school age.</p> <p>5 Q. Do you remember, ballpark, the ages of the 6 kids?</p> <p>7 A. Ballpark, I would say probably 12, 11, and 10, 8 somewhere up in there.</p> <p>9 Q. Okay. How long did it take you to get to 10 where Clarissa was on Prairie?</p> <p>11 A. I'm not sure. Like -- Because it's straight 12 shot up King Drive, so it didn't take too long. The 13 exact minutes, I don't know.</p> <p>14 Q. Okay. When you were leaving to get Clarissa's 15 Jimmy and you were going to pick her up, did you see any 16 police in the area?</p> <p>17 A. When I was leaving to get her Jimmy, it was 18 parked downstairs.</p> <p>19 Q. Right. Did you see any police in the area --</p> <p>20 A. No.</p> <p>21 Q. -- at any time?</p> <p>22 A. No, I didn't see any police at that time.</p> <p>23 Q. Okay.</p> <p>24 A. When I left the building, no, I didn't see any</p>	<p>1 So I proceed into the parking lot. So as I'm 2 getting deeper into the parking lot, I see the 3 blue-and-white car come behind me with the lights 4 flashing. So I really, like, moved over because I'm 5 thinking he trying to go past. But he stopped behind 6 me. And then the black car come in. And Clarissa 7 looked back and said, "That's AJ and Watts."</p> <p>8 Q. Let me stop you. Before you got into the 9 parking lot of the 5- -- is it the 511 building?</p> <p>10 A. Yeah.</p> <p>11 Q. Were there any traffic signals that you had to 12 go through to get to that parking lot?</p> <p>13 A. After I turn -- make the right turn onto -- 14 off of King Drive and get up to Rhodes, it's no stop 15 sign right there. That's why I'm like, "How y'all going 16 to give me a ticket for that bull jive?" That was the 17 first hand.</p> <p>18 Q. It's your testimony that there was no stop 19 sign --</p> <p>20 A. No stop sign on Rhodes -- on 37th and Rhodes 21 going east and west. There was no stop sign.</p> <p>22 Q. Are there stop signs for traffic on Rhodes 23 that go north and south?</p> <p>24 A. Yes.</p>
Page 255	Page 257
<p>1 police.</p> <p>2 Q. Okay. And that's what I'm asking, from the -- 3 you go -- At one point, you go downstairs to get coffee. 4 Then you go upstairs. Then you come down to get 5 Clarissa. You get the car. At no time did you see any 6 police that morning, correct?</p> <p>7 A. Correct. I didn't see any police.</p> <p>8 Q. Okay. And then -- And did you stop anywhere 9 or just drove straight to Clarissa?</p> <p>10 A. I drove to get Clarissa.</p> <p>11 Q. And then when you got there, did you have to 12 go inside of a building?</p> <p>13 A. No. I blew the horn, and she came out.</p> <p>14 Q. Okay. And tell me the path that you took to 15 go back home after you picked up Clarissa.</p> <p>16 A. After I picked up Clarissa, I went down 17 King Drive to 37th Street, make a right to Rhodes, make 18 a left up to the parking lot, entered the parking lot 19 behind 511. As I'm coming up, that's when I see the 20 blue-and-white car, and it was a little -- I believe 21 there was a black car or something in front of it. They 22 was at the stop sign, on the other side of the stop 23 sign. So it looked like the blue-and-white car had 24 pulled that car over.</p>	<p>1 Q. And where are those stop signs at?</p> <p>2 A. On Rhodes.</p> <p>3 Q. Right. What -- Is there an intersection?</p> <p>4 A. 37th Street.</p> <p>5 Q. Okay. So you would agree there are stop signs 6 at 37th and Rhodes?</p> <p>7 A. But -- Yes. But not that I would have to stop 8 at. I was able to legally make a left turn without 9 stopping. And from their vantage point, even if it was 10 a stop sign there, they couldn't tell you from where 11 they was at if I actually stopped or ran that stop sign 12 because they was across 36th Street at the stop sign.</p> <p>13 Q. Is there a stop sign at 35th and Rhodes?</p> <p>14 A. Yes, because you just leading out to the big 15 street on 35th.</p> <p>16 Q. So if you're driving from -- If you're going 17 southbound on Rhodes and you come upon 35th Street, 18 there's a stop sign there?</p> <p>19 MR. TEPFER: All of these questions are relating to 20 in December of 2005, correct?</p> <p>21 MR. BAZAREK: We're talking about 22 December 11, 2005.</p> <p>23 MR. TEPFER: Okay. I just want to make sure.</p> <p>24</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 258</p> <p>1 BY THE WITNESS:</p> <p>2 A. You said if you're coming south on 35th?</p> <p>3 Q. No. On Rhodes. If you're -- Can you --</p> <p>4 A. You said from 35th and Rhodes if I'm going</p> <p>5 south.</p> <p>6 Q. Yes.</p> <p>7 A. There's a stop sign on 36th that you would</p> <p>8 have to stop at to get -- before you could go across and</p> <p>9 turn into 511.</p> <p>10 Q. Okay. Did you ever see a police car there?</p> <p>11 A. I just told you that. I saw the police car</p> <p>12 behind the little car like it stopped him, like it had</p> <p>13 pulled him over.</p> <p>14 Q. What street was the police car on?</p> <p>15 A. 36th at the stop sign behind the little black</p> <p>16 car.</p> <p>17 Q. Was it in traffic, or was it on the curb?</p> <p>18 A. It was pulled over to the side, like, one</p> <p>19 behind the other like they was parked.</p> <p>20 Q. Okay.</p> <p>21 A. Like, he pulled behind him and had his lights</p> <p>22 on like he had pulled him over.</p> <p>23 Q. All right.</p> <p>24 A. And I'm coming northbound on Rhodes.</p>	<p style="text-align: center;">Page 260</p> <p>1 east side because I'm facing north. I'm coming north.</p> <p>2 Q. Okay. So you --</p> <p>3 A. So I -- Excuse me. Excuse me.</p> <p>4 Q. Go ahead.</p> <p>5 A. So I wouldn't have had to pass them to turn</p> <p>6 into the parking lot. They was already on that side of</p> <p>7 the street. They was at the stop sign down there. I</p> <p>8 come from 37th Street.</p> <p>9 Q. So you'd be driving towards them?</p> <p>10 A. Yes. And the parking lot is before the stop</p> <p>11 sign. So I turn into the parking lot.</p> <p>12 Q. You take a right?</p> <p>13 A. Into the parking lot.</p> <p>14 Q. Okay.</p> <p>15 A. And I'm driving up through the parking lot.</p> <p>16 I'm finna ride up to go park in front of the building.</p> <p>17 And the blue-and-white car come just before I get all</p> <p>18 the way out the parking lot. (Verbally indicating.)</p> <p>19 And so I'm thinking he trying to get past. So I pulled</p> <p>20 to the right. But he stayed behind me, so I stopped the</p> <p>21 car.</p> <p>22 Q. Did you recognize the officer in the</p> <p>23 blue-and-white car?</p> <p>24 A. No.</p>
<p style="text-align: center;">Page 259</p> <p>1 Q. So you agree you drove right past the</p> <p>2 blue-and-white police car and the other black car?</p> <p>3 A. No.</p> <p>4 Q. No?</p> <p>5 A. No. They was facing southbound. This is</p> <p>6 36th Street right here. There's a stop sign on this</p> <p>7 side of the street, and there's one on this side of the</p> <p>8 street if you're going south. So you have to stop at</p> <p>9 the stop sign before you can cross 36th Street going</p> <p>10 north. And then there's one on this side of 36th Street</p> <p>11 when you're going south. So you have to stop on that</p> <p>12 side, which is where they were, one behind the other</p> <p>13 one, like the blue-and-white --</p> <p>14 Q. Which one was --</p> <p>15 A. The blue-and-white was in the back, and the</p> <p>16 little black car was in the front. That's why it had</p> <p>17 the appearance that the blue-and-white car had pulled</p> <p>18 over the black car.</p> <p>19 Q. Okay. And that was on Rhodes, correct?</p> <p>20 A. Yes. 36th.</p> <p>21 Q. What side of the street? On the east side or</p> <p>22 the west side?</p> <p>23 A. I would have to say they was on the west side</p> <p>24 of 36th because they was facing south. And I was on the</p>	<p style="text-align: center;">Page 261</p> <p>1 Q. Had you ever seen that officer before that</p> <p>2 day?</p> <p>3 A. No.</p> <p>4 Q. Did you later learn the name of that police</p> <p>5 officer?</p> <p>6 A. I still don't know his name. I just know they</p> <p>7 said he died.</p> <p>8 Q. Okay. And so then -- So you see the marked</p> <p>9 police car. Is there one police officer in it?</p> <p>10 A. Yeah. It's just him. The tall white guy,</p> <p>11 baldhead.</p> <p>12 Q. And then you see this other -- is it a black</p> <p>13 car?</p> <p>14 A. Yeah. The black car that I thought he had</p> <p>15 pulled over, I guess it pulled up behind us, too. And</p> <p>16 Clarissa looked back and said, "That's Watts and AJ."</p> <p>17 And I said, "Oh, here go some bullshit."</p> <p>18 Q. Were the windows on that car tinted?</p> <p>19 A. The back two windows and -- The back two</p> <p>20 windows was tinted, and then the back what you would</p> <p>21 call the windshield was tinted.</p> <p>22 Q. Did you look in your rearview mirror to see</p> <p>23 that black car?</p> <p>24 A. I seen it in the side-view mirror.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 262</p> <p>1 Q. Could you see who was inside the car? 2 A. No. I seen them as they was getting out. 3 Q. Okay. So your testimony is you couldn't tell 4 who was inside the car at that time? 5 A. Right. 6 Q. Did you think it was a covert police vehicle? 7 A. No. I thought it was somebody that had got 8 pulled over initially when I saw -- 9 Q. Right. 10 A. -- the blue-and-white behind him on Browning. 11 On 36th Street, I thought it was somebody that got 12 pulled over. It was not until they exited the vehicle 13 after the blue-and-white car got behind me that I 14 realized it was Watts and AJ. 15 Q. Okay. 16 A. When I turned around, they were already 17 exiting the car. But Clarissa had looked back and seen 18 them and said, "That's AJ and Watts," which is something 19 they usually do. They would take people's cars that 20 they arrested and come back through in other people's 21 cars and jump out and run in on people. 22 Q. Tell me, before you got in that car that day 23 to pick up Clarissa, did you search the vehicle? 24 A. For what?</p>	<p style="text-align: center;">Page 264</p> <p>1 using the car on December 11, 2005? 2 A. December 11, yes. 3 Q. I'm sorry. Do you have an independent 4 recollection of you using the car on December 10, 2005? 5 A. Yes. 6 Q. Where did you go? 7 A. I drove Clarissa to Olympia Fields where her 8 and her brothers was clearing out their father's house. 9 So we had to go and get the U-Haul, the moving van -- 10 the moving truck, rather. And they went that way to go 11 do that, and I went back home. 12 Q. So that was the day before you were arrested? 13 A. Yeah. 14 Q. Okay. How about December 9, 2005? Did you 15 use the vehicle that day? 16 A. I don't recall. 17 Q. Did you still have the use of your Chevy? 18 A. No. 19 Q. The key had already been lost? 20 A. Yes. 21 Q. Okay. All right. So you now observe Watts 22 and Jones exit the black vehicle, right? 23 A. Yes. 24 Q. What happened next?</p>
<p style="text-align: center;">Page 263</p> <p>1 Q. Did you search it? 2 A. No. 3 Q. Prior to December 11, 2005, when had been the 4 last time you had been inside that vehicle? 5 A. Prior to December 11? 6 Q. Yes. 7 A. Most likely, it was December 10th. 8 Q. Where do you remember going inside that 9 vehicle on December 10th? 10 A. I don't know. But I know I had -- that's the 11 vehicle I was driving because, like I said, I lost the 12 keys to my car. So I couldn't drive mine, so I would 13 drive hers. 14 Q. Did anyone else use that car, the Jimmy, on 15 December 10th other than you? 16 A. Maybe Clarissa. 17 Q. You know that, or you're just guessing? 18 A. It was her car, so I'm -- if she had to go 19 somewhere, I'm quite sure she would drive her car. 20 Q. Right. But as you sit here at this 21 deposition, you have no independent recollection of 22 Clarissa using the car on December 10, 2005, correct? 23 A. Correct. 24 Q. Do you have an independent recollection of you</p>	<p style="text-align: center;">Page 265</p> <p>1 A. AJ walked up to the door. 2 Q. Whose door? 3 A. My door. And he opened it, told me to get 4 out, which I was getting out anyway. No. I had got out 5 and shut the door. And Clarissa got out. And then AJ 6 walked up to me, and he just start searching me. I'm 7 like, "What is you doing?" And then he pulled my pants, 8 looked down my pants. And then he took the keys out my 9 hand, went to the car. They told -- Watts said, "Y'all 10 stand over there with him," which was the officer, the 11 tall officer in the blue-and-white car. So me and 12 Clarissa go and stand over there by him. And they 13 proceeded to search the car. 14 Q. So I want to take a step back. So you got out 15 of the car voluntarily; is that right? 16 A. Yeah, because that's where I lived at. 17 Q. Right. You got out of the car voluntarily, 18 right? 19 A. Yeah. 20 Q. Okay. And Clarissa got out of the car 21 voluntarily? 22 A. Yeah. And we locked the doors. So I don't 23 understand -- I don't know why they -- he would take the 24 keys or search me. I didn't understand.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 266</p> <p>1 Q. So you -- All right. But when you exited the 2 vehicle and then Clarissa gets out of the vehicle, she's 3 passenger side, right?</p> <p>4 A. Yes.</p> <p>5 Q. You then lock the vehicle?</p> <p>6 A. Yes, because we was going to go in the 7 building.</p> <p>8 Q. And then where are the keys?</p> <p>9 A. In my hand.</p> <p>10 Q. Did you start walking toward your apartment?</p> <p>11 A. Yeah. And then AJ was like, "No. Y'all come 12 here." So --</p> <p>13 Q. Oh, so you were already walking away?</p> <p>14 A. Yeah, I was walking away. The blue-and-white 15 guy, he just stood there. And they was right -- They 16 pulled up. They was just right there. I don't know why 17 they right there. So we going to walk to the building. 18 And AJ was like, "No. Y'all come here." So --</p> <p>19 Q. How many steps did you take?</p> <p>20 A. Just maybe three or four. And Clarissa had -- 21 when she shut her door, she just started walking toward 22 the building.</p> <p>23 Q. So she was ahead of you walking?</p> <p>24 A. Yeah. She had got a little further than me,</p>	<p style="text-align: center;">Page 268</p> <p>1 take five minutes?</p> <p>2 MR. BAZAREK: Okay.</p> <p>3 THE VIDEOGRAPHER: The time is 4:54 p.m. We are 4 now off the record.</p> <p>5 (A short break was had.)</p> <p>6 THE VIDEOGRAPHER: The time is 5:11 p.m. We are 7 now back on the record.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Okay. Mr. Baker, as you and Clarissa are 10 walking back towards your apartment, what happened next?</p> <p>11 A. AJ said, "No. Y'all come here." And when I 12 turned back -- When we turned back around, he proceeded 13 to search me, looked down my pants, patted my pockets. 14 Then he took the key out my hand and went and opened the 15 car. And then Watts said, "Can y'all stand over by that 16 officer?"</p> <p>17 Q. Okay. And did you do what Watts told you to 18 do?</p> <p>19 A. Yeah, as I'm asking, like, "For what?" And he 20 said, "Stand over by the officer." Okay. We stood by 21 the officer.</p> <p>22 Q. Were you in handcuffs?</p> <p>23 A. No.</p> <p>24 Q. Was Clarissa in handcuffs?</p>
<p style="text-align: center;">Page 267</p> <p>1 but not by much.</p> <p>2 Q. And then did you park in a parking space, or 3 you just -- Where did you park?</p> <p>4 A. We -- There was no parking spaces up there. 5 People that lived in the building would just park in the 6 playground up there because there was no -- nothing for 7 the kids to play on. So we would just park.</p> <p>8 Q. Tell me, in that parking lot at that time 9 after you got out of the car, was anyone else present 10 other than you, Clarissa, the tall, bald officer, and 11 Watts and Jones?</p> <p>12 A. Like right there in the parking lot?</p> <p>13 Q. Yes.</p> <p>14 A. No.</p> <p>15 Q. Did -- When Clarissa is walking ahead of you 16 after you got out of the car, did Clarissa say anything 17 to you?</p> <p>18 A. No. The last thing Clarissa said to me was, 19 "That's AJ and Watts."</p> <p>20 Q. But she said that to you while you were inside 21 the car, right?</p> <p>22 A. Yeah. As we finna get out the car, yes.</p> <p>23 Q. Okay.</p> <p>24 MR. TEPFER: Let's take a little break. Can we</p>	<p style="text-align: center;">Page 269</p> <p>1 A. No.</p> <p>2 Q. Did you say anything to that officer in the 3 blue shirt?</p> <p>4 A. I said, "What you pull me over for?"</p> <p>5 Q. And what did he say?</p> <p>6 A. He was like, "He told me to pull you over," 7 pointed at AJ and Watts. But he didn't say which one 8 specifically said pull you over. But I figured since 9 Watts was the sergeant.</p> <p>10 Q. You're saying that that officer had a blue 11 shirt on, in uniform?</p> <p>12 A. Yes.</p> <p>13 Q. He told you that they told him to pull you 14 over?</p> <p>15 A. Yeah.</p> <p>16 Q. And what did you say to him?</p> <p>17 A. "For what?" He don't know.</p> <p>18 Q. Did Clarissa say anything to that officer?</p> <p>19 A. Not that I recall.</p> <p>20 Q. Was anything else said between you and that 21 officer?</p> <p>22 A. No, not that I recall.</p> <p>23 Q. So what happened next?</p> <p>24 A. They proceeded to search the car. They inside</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 270</p> <p>1 the car, in the front, in the back. They let up the 2 hatchback back there. They searching back there. Then 3 they let up the hood of the car, and they looking up 4 under the hood. And then for -- they standing in front 5 of the hood out of our view. We can't see them. But I 6 heard somebody out the window say, "I saw that shit." 7 But I can't say who said it. I know it was female.</p> <p>8 Q. Did the person who said "I saw that shit" say 9 anything else?</p> <p>10 A. "He took that out his sleeve."</p> <p>11 Q. That was a female voice you heard?</p> <p>12 A. Yes. But I don't know who it was.</p> <p>13 Q. Did anyone ever tell you who it was?</p> <p>14 A. No. They did tell me that Watts and them came 15 back to the building and said, "If anybody plan on 16 testifying for Ben and Clarissa, their ass going to 17 jail, too."</p> <p>18 Q. Who told you that?</p> <p>19 A. Tameka told me that.</p> <p>20 Q. Tameka who?</p> <p>21 A. Tameka Nickerson. There's people down -- 22 Winky said it, that I recall.</p> <p>23 And then next thing you know, they came from 24 around the truck, around the front of the truck, the</p>	<p style="text-align: center;">Page 272</p> <p>1 MR. TEPFER: Sorry. Could you hear all that? 2 THE WITNESS: Okay.</p> <p>3 MR. TEPFER: Was everyone hearing the testimony? 4 MR. GAINER: Yes.</p> <p>5 MS. McGRATH: Yep.</p> <p>6 MR. PALLES: Yeah, I can hear him.</p> <p>7 BY MR. BAZAREK:</p> <p>8 Q. Where was Officer Jones when you heard Watts 9 say something?</p> <p>10 A. When I heard Watts say, "I got it" --</p> <p>11 Q. Yes.</p> <p>12 A. -- "Put him in cuffs"?</p> <p>13 Q. Yes.</p> <p>14 A. He was standing with us, with me, Clarissa, 15 and the two -- and the officer.</p> <p>16 Q. And it's your testimony when Watts said, "I 17 got it," you couldn't see anything in his hands?</p> <p>18 A. Right.</p> <p>19 Q. Which -- Was Jones -- When -- Strike that.</p> <p>20 When Watts says, you know, "I got it," which 21 direction was Jones facing?</p> <p>22 A. Jones was facing towards 527. He was actually 23 standing right there with us. We were all facing 527 24 because the car was parked in front of 5- -- facing 527.</p>
<p style="text-align: center;">Page 271</p> <p>1 hood of the truck, and they walked back toward us. And 2 then Watts just turned back around, walked to the door, 3 and said, "I got it. Put his ass in cuffs. You can put 4 her in cuffs, too. I don't give no fuck." And he 5 walked through 527.</p> <p>6 Q. Did Watts have anything in his hand?</p> <p>7 A. He said, "I got it." I never saw what he 8 grabbed. But I know me and the officer looked at each 9 other like, this door been open all the time y'all was 10 searching. If it was something sitting right there to 11 where you could just walk right there and say, "I got 12 it," we would have saw it.</p> <p>13 Q. What door are you referring to?</p> <p>14 A. The driver door, the driver's side door, front 15 seat, front driver door.</p> <p>16 Q. That's where -- And you had been seated there 17 before you left the vehicle --</p> <p>18 A. I was driving.</p> <p>19 Q. -- correct?</p> <p>20 A. Yes. I was driving.</p> <p>21 Q. Yeah.</p> <p>22 A. I wasn't sitting on the door. But I was in 23 the driver's seat.</p> <p>24 THE WITNESS: Oh, shit.</p>	<p style="text-align: center;">Page 273</p> <p>1 Q. Okay. But from where you're looking toward 2 the 527 and the car, what portion of the car would be 3 closest to you?</p> <p>4 A. The back of the car. The hatchback part would 5 be closer. But we was, like -- This is the car, and we, 6 like, over here. But the car was up some more. But we, 7 like, over here.</p> <p>8 Q. So from where you stood with Clarissa and 9 Officer Jones and the officer with the blue shirt, you 10 would not be able to see inside of the driver's side of 11 the car?</p> <p>12 A. Yes. You could see the driver's side of the 13 car.</p> <p>14 Q. Could you --</p> <p>15 A. But he didn't go inside the car. He just 16 touched the door and said, "I got it."</p> <p>17 Q. What door?</p> <p>18 A. The driver door, the driver's side door, the 19 front door.</p> <p>20 Q. From where you stood --</p> <p>21 A. We could see him visibly.</p> <p>22 Q. From where you stood, could you see the 23 console near the driver's side door?</p> <p>24 A. If -- The console, to my understanding, would</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 274</p> <p>1 be, like, the armrests or something like that. But the 2 door, you know, there's an arm little thing on the door 3 for, like, when you open the door.</p> <p>4 Q. Was there a console or some type of 5 compartment on the driver's side door?</p> <p>6 A. You know the thing where you let the window 7 down, let the window up, lock the doors, that's on the 8 door. And that handle to open the door is on the door. 9 That door is open, like, swung open.</p> <p>10 Q. Okay.</p> <p>11 A. We could all visibly see that the whole time. 12 Once AJ opened the car door, we could see the driver's 13 door. It's open. We can see what color it is. We can 14 see the handle. We can see the lever you let the window 15 up and down, the lock. We see all that.</p> <p>16 So for them to search the car for 30 minutes 17 or more and then go to the front of the car and look 18 under the hood and then come back to where we was at, 19 and then he didn't say nothing. He come back to where 20 we was at, him and AJ. Then he walked back towards the 21 car. As he passing the car, he said, "I got it. Put 22 his ass in handcuffs. You can put her in cuffs, too. I 23 don't give a fuck." And he proceeded to walk through 24 527, leaving me, AJ, Clarissa, and the blue-and-white</p>	<p style="text-align: center;">Page 276</p> <p>1 A. At the police station. 2 Q. All right. So when -- So he just walks away 3 to the 527 building?</p> <p>4 A. He walks through there. And I later found out 5 that they was over in one of the back buildings. I 6 think it was 574. They had did a sting over there.</p> <p>7 Q. Who would sell narcotics out of the 574 8 building?</p> <p>9 A. I didn't hang at the 574 building.</p> <p>10 Q. Did -- Would they sell heroin out of the 11 575 -- I'm sorry -- 574 building?</p> <p>12 A. I don't want to guess. I don't know who sold 13 drugs over there.</p> <p>14 Q. Okay. No. My question, though, is, could -- 15 Strike that.</p> <p>16 Did individuals sell cocaine and heroin out of 17 the 574 building?</p> <p>18 A. It's logical. But if I say yeah, then you 19 going to say, "Who?" I don't know who.</p> <p>20 Q. Okay. But you agree that narcotics were sold 21 out of the 574 building, true?</p> <p>22 A. It's highly likely.</p> <p>23 Q. Okay. Well, wouldn't that be your 24 competition?</p>
<p style="text-align: center;">Page 275</p> <p>1 officer standing there.</p> <p>2 So the blue-and-white officer put his cuffs on 3 me. AJ put his cuffs on Clarissa. Then they called a 4 lady officer, and she came. And she got Clarissa, took 5 her to the car, searched Clarissa. Then she took AJ's 6 cuffs off Clarissa, put her cuffs on Clarissa, gave AJ 7 his cuffs. She transported Clarissa to the police 8 station. And this officer -- I don't know his name -- 9 transported me to the police station.</p> <p>10 Q. During the time period when Sergeant Watts 11 walked toward the 527 building, did Officer Jones say 12 anything to you or Clarissa?</p> <p>13 A. He told her to put her hands behind her back.</p> <p>14 Q. Anything else?</p> <p>15 A. Not that I could hear.</p> <p>16 Q. Did you or Clarissa say anything to 17 Officer Jones during that time?</p> <p>18 A. "This is fucked up."</p> <p>19 Q. Who said that?</p> <p>20 A. Both of us, basically, like, at the same time.</p> <p>21 Q. What did Jones say?</p> <p>22 A. He didn't say nothing. "Click." That's what 23 he said, "Click."</p> <p>24 Q. When was the next time you saw Watts?</p>	<p style="text-align: center;">Page 277</p> <p>1 A. No. You're only your own -- 2 MR. TEPFER: Objection to form. 3 Go ahead.</p> <p>4 BY THE WITNESS:</p> <p>5 A. You're only your own competition.</p> <p>6 Q. What was that?</p> <p>7 A. You're only your own competition when you're 8 serving drugs. You shouldn't care about what somebody 9 else doing.</p> <p>10 Q. Yeah. But wouldn't you want -- wouldn't you 11 want to sell the narcotics -- Strike that.</p> <p>12 Wouldn't you want to have more people come to 13 you to buy narcotics than go to, say, the 574 building 14 because it's more money for you, right?</p> <p>15 A. That would be the goal, I guess.</p> <p>16 Q. Okay. So is it your testimony that you have 17 no information of any sort who engaged in narcotics 18 activity at the 574 building?</p> <p>19 A. It would all be hearsay. I can't tell you 20 that. I don't --</p> <p>21 Q. You can tell me hearsay.</p> <p>22 A. No, I can't.</p> <p>23 Q. Sure, you can.</p> <p>24 A. Well, I don't -- No, I can't tell you.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 278	Page 280
<p>1 Q. Well, do you know, or you don't know?</p> <p>2 A. I don't -- I never -- I can't say he sold, he</p> <p>3 sold, she sold. For all I know, you sold. I don't</p> <p>4 know.</p> <p>5 Q. Did any -- Do you know anyone who sold</p> <p>6 narcotics out of the 574 building?</p> <p>7 A. Again, sir, I can't testify to that. I can't</p> <p>8 say I know for a hundred percent -- What's your name?</p> <p>9 Q. William.</p> <p>10 A. -- that William sold heron in 574. I can't</p> <p>11 testify to that because I don't know.</p> <p>12 Q. Is it because the years have gone by and you</p> <p>13 did know back then?</p> <p>14 A. It's because I don't know.</p> <p>15 Q. Was there a cleanup man for the 527 building?</p> <p>16 A. A cleanup man? I don't know.</p> <p>17 Q. Do you know what a cleanup man is?</p> <p>18 A. What is that? I know they had a janitor</p> <p>19 assigned to the building.</p> <p>20 Q. Well, if the police are coming, you know, hide</p> <p>21 the dope. Did you have a cleanup man to hide the dope?</p> <p>22 A. I guess whoever was serving would run and hide</p> <p>23 the dope.</p> <p>24 Q. Do you know anyone named Van Jordan?</p>	<p>1 would run and give me the drugs and I take off.</p> <p>2 Q. Well, was --</p> <p>3 A. If that's what you saying, I don't --</p> <p>4 Q. Yeah. Was that something people would yell</p> <p>5 out when the police were afoot, like, "Cleanup,</p> <p>6 cleanup"?</p> <p>7 A. Yeah.</p> <p>8 Q. Okay. So you did hear that?</p> <p>9 A. I heard clean --</p> <p>10 MR. TEPFER: Objection. Objection: argumentative,</p> <p>11 misstates the evidence. That's not the question that</p> <p>12 was asked.</p> <p>13 BY MR. BAZAREK:</p> <p>14 Q. Go ahead.</p> <p>15 A. I heard cleanup. So whoever had drugs on them</p> <p>16 would run with the drugs.</p> <p>17 Q. What would be the reason to say cleanup?</p> <p>18 A. The police coming.</p> <p>19 Q. And it would be -- would --</p> <p>20 A. Or it could have been the stickup man.</p> <p>21 Q. Would the phrase "cleanup" be yelled out or</p> <p>22 just normal conversation, "Cleanup. Cleanup time"?</p> <p>23 A. Yeah, it would probably be so that whoever had</p> <p>24 drugs could hear it.</p>
<p style="text-align: center;">Page 279</p> <p>1 A. Van Jordan?</p> <p>2 Q. Yeah. The mechanic?</p> <p>3 A. V that just died?</p> <p>4 Q. Yeah. How did he die?</p> <p>5 A. I don't know.</p> <p>6 Q. V House?</p> <p>7 A. Yeah. The mechanic. V. Yeah. Little</p> <p>8 light-skinned guy.</p> <p>9 Q. When did he die?</p> <p>10 A. I think it was last month. They had it on</p> <p>11 Facebook.</p> <p>12 Q. Do you know where he was living?</p> <p>13 A. No.</p> <p>14 Q. Did V House engage in narcotics activity?</p> <p>15 A. V, to my knowledge, was a mechanic, what we</p> <p>16 would call the alley mechanic. If you needed your</p> <p>17 brakes did, V would do it for a reasonable price.</p> <p>18 Q. Is it your testimony that you've never heard</p> <p>19 the term "cleanup man" before other than just a</p> <p>20 janitor-type thing?</p> <p>21 A. I don't know what a cleanup man. I just know</p> <p>22 if the police was coming in the building, whoever had</p> <p>23 drugs on them would run. I mean, it wasn't like if Josh</p> <p>24 was selling drugs and they say the police coming, he</p>	<p style="text-align: center;">Page 281</p> <p>1 Q. So loud?</p> <p>2 A. So whoever had drugs could hear it. Loud</p> <p>3 enough for that.</p> <p>4 Q. So separate from the person who would be</p> <p>5 dealing, serving -- Is that a phrase in the drug world,</p> <p>6 like, serving narcotics?</p> <p>7 A. What that paper say?</p> <p>8 Q. You tell me. What paper are you talking</p> <p>9 about?</p> <p>10 A. I mean, I guess it could be. Anything could</p> <p>11 be said in the narcotics world.</p> <p>12 Q. Okay. But other than the people who were</p> <p>13 actually selling the narcotics, would there be a</p> <p>14 dedicated person who would be the cleanup man, or the</p> <p>15 cleanup man was usually the person who was selling dope?</p> <p>16 A. Whoever --</p> <p>17 MR. TEPFER: Objection to form.</p> <p>18 Go ahead.</p> <p>19 BY MR. BAZAREK:</p> <p>20 Q. Go ahead.</p> <p>21 A. Whoever had drugs would run if the police</p> <p>22 came.</p> <p>23 Q. Okay. Yeah. What I was getting at, would</p> <p>24 that person, would he give it to someone else, like, to</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 282	Page 284
<p>1 run?</p> <p>2 A. I don't have knowledge of that. I don't --</p> <p>3 Q. So I want to make sure I understand your</p> <p>4 testimony. So the cleanup man at Ida B. Wells could</p> <p>5 be -- Or strike that.</p> <p>6 The cleanup man at Ida B. Wells would also be</p> <p>7 the drug dealer who was selling the drugs, right?</p> <p>8 MR. TEPFER: Objection to the form of the question.</p> <p>9 I believe -- Go ahead. Misstates the testimony.</p> <p>10 BY THE WITNESS:</p> <p>11 A. I don't know about the cleanup man. The</p> <p>12 cleanup man is the guy at the bar that get the last lady</p> <p>13 at the bar, and he get lucky enough to take her home.</p> <p>14 That's the cleanup man.</p> <p>15 Q. All right. So you never used that -- You</p> <p>16 never heard the phrase "cleanup man" as it pertains to</p> <p>17 narcotics activity at Ida B. Wells; is that correct?</p> <p>18 A. I never heard of cleanup man. I heard</p> <p>19 cleanup. And cleanup mean the police coming or the</p> <p>20 pickup man coming.</p> <p>21 Q. Did V House ever clean up at Ida B. Wells?</p> <p>22 MR. TEPFER: Objection: form.</p> <p>23 BY THE WITNESS:</p> <p>24 A. I don't know.</p>	<p>1 as this officer put me in his car.</p> <p>2 Q. The blue-and-white?</p> <p>3 A. Yes. What was his name?</p> <p>4 Q. Was it Soltesz (phonetic)?</p> <p>5 A. I'm asking. Oh, I can't ask. I'm sorry.</p> <p>6 MR. TEPFER: It's okay.</p> <p>7 BY MR. BAZAREK:</p> <p>8 Q. Does that name ring a bell? Soltesz?</p> <p>9 A. I don't know. I just know he was a tall, tall</p> <p>10 white guy.</p> <p>11 Q. Okay. All right. So going back to the</p> <p>12 female, did anyone say anything to the female officer</p> <p>13 who arrived on the scene, and did the female officer say</p> <p>14 anything to anyone on the scene?</p> <p>15 A. I don't know. I'm quite sure she said</p> <p>16 something to Clarissa.</p> <p>17 Q. But you don't know?</p> <p>18 A. Right, because I wasn't in earshot. I wasn't</p> <p>19 there. AJ walked her over there.</p> <p>20 Q. And on that day, you never saw Watts again at</p> <p>21 least in the area of the 527 building after he walked</p> <p>22 away, correct?</p> <p>23 A. Next time I saw Watts was at the police</p> <p>24 station.</p>
<p style="text-align: center;">Page 283</p> <p>1 Q. Okay. So I don't know if I -- Let's go back</p> <p>2 to you're still in a parking lot -- right? -- at the</p> <p>3 511 building, right? This is on December 11, '05.</p> <p>4 A. Okay.</p> <p>5 Q. I want to go back to that. So the female</p> <p>6 officer who arrived on the scene, had you ever seen her</p> <p>7 before?</p> <p>8 A. She was a blue-and-white. I can't say that I</p> <p>9 have seen her before. I don't even remember her now.</p> <p>10 If she was --</p> <p>11 Q. Okay.</p> <p>12 A. It could be her, for all I know. I don't</p> <p>13 know.</p> <p>14 Q. So do you remember her race? Was she white?</p> <p>15 Black? Hispanic?</p> <p>16 A. I think she was white, but I'm not sure.</p> <p>17 Q. Did she say anything to anyone after she</p> <p>18 arrived on the scene?</p> <p>19 A. I don't know because AJ walked Clarissa</p> <p>20 because she didn't pull all the way up. So AJ walked</p> <p>21 Clarissa to her car and gave her to her. She took the</p> <p>22 handcuffs off of Clarissa, gave them to AJ, put hers on</p> <p>23 Clarissa. She turned Clarissa around. AJ walked off.</p> <p>24 And she, like, searched Clarissa in the door of the car</p>	<p style="text-align: center;">Page 285</p> <p>1 Q. Okay. How long -- From the time Watts walked</p> <p>2 toward the 527 building, how much time passed before you</p> <p>3 were taken to the police station?</p> <p>4 A. Well, the lady officer pulled up. AJ walked</p> <p>5 Clarissa that way. At that time, the guy was putting me</p> <p>6 in the car. So I would say within, I guess, seven to</p> <p>7 ten minutes, I was headed to 51st Street.</p> <p>8 Q. Did anyone else arrive at that parking lot</p> <p>9 that you were at other than the female officer and the</p> <p>10 officer in the blue shirt and Watts and Jones? Any</p> <p>11 other officers show up at the scene?</p> <p>12 A. No.</p> <p>13 Q. Okay.</p> <p>14 A. Then I found out later, once I got to the</p> <p>15 police station, that the other officers was back there</p> <p>16 at 574. They had done the sting, and they arrested</p> <p>17 those guys.</p> <p>18 Q. Do you know who -- Do you know any of the</p> <p>19 people who were arrested at the 574 building?</p> <p>20 A. Yeah. I think I knew this old dude, older</p> <p>21 dude, Kurt, and Fred. And one of them said that they</p> <p>22 was pitching in 574 and when they had them downstairs,</p> <p>23 somebody called them and said, "Benny going to be</p> <p>24 pulling -- Ben going to be pulling up." And Watts and</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 286	Page 288
<p>1 AJ left. This was the guy -- I think it was Fred told 2 me that at the police station.</p> <p>3 Q. What's Fred's last name?</p> <p>4 A. I don't know.</p> <p>5 Q. Was there someone named Roberson out there or Robinson?</p> <p>6 A. I don't know.</p> <p>7 Q. Anyone named Moore, last name Moore?</p> <p>8 A. I don't know.</p> <p>9 Q. Okay. So you were told at the police station that Watts and Jones received information about you?</p> <p>10 A. Yeah.</p> <p>11 Q. And they heard that when they were at the 574 building?</p> <p>12 A. Yeah.</p> <p>13 Q. What was the information that was said to them?</p> <p>14 A. That I would be -- That I would be pulling up. That I would be pulling up to the building.</p> <p>15 Q. Did -- And his -- Who -- His first name was -- Who told you that?</p> <p>16 A. Fred, I believe it was.</p> <p>17 Q. Okay. And you said that these guys were pitching at the 574 building; is that right?</p>	<p>1 up for me and Clarissa. And then it was a group effort 2 writing that report up, too.</p> <p>3 Q. What did the bundle look like?</p> <p>4 A. I think it was, like, peach bags, if I 5 remember correctly. Little plastic bag full of 6 individual bags.</p> <p>7 Q. So other than that bag of narcotics, did you see any other narcotics that day at the station?</p> <p>8 A. No.</p> <p>9 Q. What kind of narcotics was it?</p> <p>10 A. Heroin.</p> <p>11 Q. Do you remember the amount?</p> <p>12 A. No.</p> <p>13 Q. The number of bags?</p> <p>14 A. No.</p> <p>15 Q. Street value?</p> <p>16 A. No.</p> <p>17 Q. Okay. So let's take a step back. You get back to the -- You -- You're driven to the station by the officer in a blue-and-white shirt?</p> <p>18 A. Yes.</p> <p>19 Q. And then that's the 2nd District, right?</p> <p>20 A. 51st and Wentworth.</p> <p>21 Q. Okay. And then is Clarissa already there when</p>
Page 287	Page 289
<p>1 A. Yeah. He said he was serving in the 527 2 building -- I mean, not 527 -- 574.</p> <p>3 Q. And he got arrested in a sting?</p> <p>4 A. Yeah. It was -- I want to say about eight of 5 those guys. I'm not sure of the correct number. But I 6 want to say it was about eight because they had the 7 whole -- I was able to sit on the bench. Clarissa had 8 to stand up. So they had it -- It might have been more 9 than eight. But they had from here to the end of the 10 bench.</p> <p>11 Q. And did you know any of those individuals to engage in narcotics activity at the 574 building?</p> <p>12 A. If he wouldn't have told me he was over there 13 pitching, I wouldn't -- I wouldn't know.</p> <p>14 Q. Okay. So Fred told you he got arrested because he was pitching --</p> <p>15 A. Yeah.</p> <p>16 Q. -- at the 574 building, right?</p> <p>17 A. Yeah. And he also told me when they put the 18 bundle down and said this what he got out the car, he 19 said, "That's one of our bundles."</p> <p>20 Q. Do you remember what -- Did you see any bundles at the police station?</p> <p>21 A. Just the one that they told Mohammed to write</p>	<p>1 you arrive, or do you arrive together?</p> <p>2 A. We arrive one behind the other.</p> <p>3 Q. Okay. So you're taken out of the car; Clarissa is taken out of the car that she's in, right?</p> <p>4 A. Yeah.</p> <p>5 Q. By the female officer?</p> <p>6 A. Yeah.</p> <p>7 Q. You're walked into the 51st and Wentworth building?</p> <p>8 A. Yeah.</p> <p>9 Q. And then you're taken to a processing room?</p> <p>10 A. Well, back there where they write their 11 reports at. I guess this was the tactical office. So 12 they take us back there and handcuff us to the wall. 13 And then when Watts came in, he asked, "Has she been 14 searched," talking about Clarissa. And the lady said, 15 "Well, I did the pat-down." And he said, "No. Search 16 her." So she took Clarissa behind the door and was 17 searching.</p> <p>18 Q. Is this the same female officer that was at the scene?</p> <p>19 A. Yes. And then after a while, Watts went to 20 the door. And she said, "Searching a female." And he 21 went in anyway because his office was through that door</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 290	Page 292
<p>1 and to the right. So he went in anyway. But Clarissa 2 said she had on her clothes at the time. So -- But he 3 went in when the lady hollered out that she was 4 searching a female. He went in anyway.</p> <p>5 Q. But at the time, Clarissa was fully clothed?</p> <p>6 A. She said she had her pajama pants up but her 7 jogging pants was down. So if she didn't have on 8 layers, then he probably would have seen her in her 9 underwear or something.</p> <p>10 Q. The room where you were handcuffed where they 11 do the paperwork, were you in that same room following 12 your March 23, 2005, arrest?</p> <p>13 A. Yeah, yeah.</p> <p>14 Q. Okay.</p> <p>15 A. No. I didn't go in there in 2005 because they 16 did the paperwork at the substation. No. That was 17 the -- when -- the mailbox case. So, yeah, I was in 18 there.</p> <p>19 Q. Okay. So when you get to -- When you and 20 Clarissa get to the police station, you're brought into 21 this room. Did you call it the tactical office?</p> <p>22 A. I believe that's what it was called.</p> <p>23 Q. Okay. And so --</p> <p>24 A. Because that's where the tac team was sitting.</p>	<p>1 Q. Anyone else?</p> <p>2 A. Not that I can recall right off. But whoever 3 was on their team working that day was there. I can't 4 remember specifically.</p> <p>5 Q. Okay. Did -- I know you've said that Watts 6 asked the female officer to search Clarissa. Did Watts 7 say anything else in the -- in that room?</p> <p>8 A. He was saying -- because people was saying, 9 "Hey, Watts, man, let me out of here." He was like, "I 10 ain't talking to nobody." And he said that as he was 11 going to the door to go through. And the lady hollered, 12 "Searching a female," and he went on through anyway.</p> <p>13 Q. All right. Did -- But did you ever hear Watts 14 say anything else that day?</p> <p>15 A. Not that I can recall, no.</p> <p>16 Q. So the other officers that you saw in the 17 station, Gonzalez, Bolton, and Officer Jones, did they 18 say anything at any time while you were in that tac 19 office?</p> <p>20 A. Well, to each other, I don't know what they 21 was saying because they was doing the paperwork. But I 22 know Mohammed was telling the other officers -- I mean, 23 the other guys, like, "I don't know what's going on 24 here, but all y'all be telling on each other. This the</p>
Page 291	Page 293
<p>1 That's where they was at. That's where they was 2 sectioned at.</p> <p>3 Q. Okay. What officers were inside the tac 4 office when you arrived?</p> <p>5 A. Well, I guess it was -- Mohammed was there, 6 Gonzalez, I believe, Bolton, Nichols.</p> <p>7 Q. Are you certain Nichols was there?</p> <p>8 A. I think he was there. I think so. I'm not 9 sure, though. When they locked me and Clarissa up in 10 December, they did have some other officers that was -- 11 I don't know where they at now. It was a guy that used 12 to have a little red afro. I don't know where he went. 13 Cadman was no longer there. Kenneth Young was no longer 14 there, I don't believe. It was a tall guy used to have 15 on a -- he used to wear a Starter jersey. I don't know 16 what --</p> <p>17 Q. Was he white or Black?</p> <p>18 A. He was Black. I don't know where he went.</p> <p>19 Q. So the ones you're certain were there were 20 Mohammed, Gonzalez, Bolton. You're not 100 percent on 21 whether Nichols was there. Correct?</p> <p>22 A. Right.</p> <p>23 Q. And then --</p> <p>24 A. AJ and Watts came.</p>	<p>1 only guy right here that ever took his own weight," you 2 know, when it's mine.</p> <p>3 Q. I don't follow you.</p> <p>4 A. You wouldn't.</p> <p>5 Q. So explain to me what you just said.</p> <p>6 A. He said I never told on nobody to get out of 7 jail.</p> <p>8 Q. Who said that?</p> <p>9 A. Mohammed.</p> <p>10 Q. Who did he say that to?</p> <p>11 A. The other guys that was handcuffed to the 12 wall.</p> <p>13 Q. Those were the guys that were arrested at the 14 574 building?</p> <p>15 A. Yes.</p> <p>16 Q. Including Fred?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. What -- All right. Other than 19 Mohammed, did anyone else say anything inside that tac 20 office?</p> <p>21 A. I don't -- I don't -- I don't know.</p> <p>22 Q. And I'm talking, again, about the patrolmen, 23 not -- You already talked about Watts. I'm talking 24 about the other patrol officers.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 294	Page 296
<p>1 A. It was only one patrol officer, and he brought 2 me there and put me on the wall.</p> <p>3 Q. Okay. Tac -- Maybe I -- Tac officer. I'm 4 talking about the members of Watts's team. Did any of 5 them, other than Mohammed, say something while you were 6 in the tac office?</p> <p>7 A. I told you, they was talking amongst each 8 other as they was filling out the report. I don't know 9 what they was saying.</p> <p>10 Q. Okay. Who filled out the report?</p> <p>11 A. All of them. All of them that was there on 12 Watts' team played a part in filling out the report.</p> <p>13 Q. Okay.</p> <p>14 A. Mohammed was typing, but he was taking 15 dictation. I'll say that.</p> <p>16 Q. Okay.</p> <p>17 A. Like she doing.</p> <p>18 Q. So an officer would say something, and then 19 Mohammed is --</p> <p>20 A. Yeah.</p> <p>21 Q. -- preparing the paperwork?</p> <p>22 A. Yeah.</p> <p>23 Q. But do you see any of the other officers 24 actually --</p>	<p>1 A. They destroyed it.</p> <p>2 Q. Who destroyed it?</p> <p>3 A. The City, I'm guessing.</p> <p>4 Q. Well, what were the results with -- Do you 5 know the results? Was there some type of hearing that 6 was held for the Jimmy?</p> <p>7 A. Yes.</p> <p>8 Q. Okay.</p> <p>9 A. I just told you Mohammed went there and 10 testified like he was the arresting officer when he 11 wasn't.</p> <p>12 Q. So there was a finding made against Clarissa 13 at that hearing. Is that your testimony?</p> <p>14 MR. TEPFER: Objection: calls for speculation.</p> <p>15 BY THE WITNESS:</p> <p>16 A. Right. I would --</p> <p>17 MR. TEPFER: Let me finish. Calls for speculation.</p> <p>18 Go ahead.</p> <p>19 BY THE WITNESS:</p> <p>20 A. I would guess so. They destroyed her car.</p> <p>21 Q. Was there a way for Clarissa to get her 22 vehicle back?</p> <p>23 MR. TEPFER: Objection: calls for speculation.</p> <p>24</p>
Page 295	Page 297
<p>1 A. Typing? No.</p> <p>2 Q. -- typing?</p> <p>3 A. They just dictating.</p> <p>4 Q. Okay. And then --</p> <p>5 A. And then I don't understand how Mohammed 6 wasn't there at the actual arrest but he was there to 7 testify and get Clarissa's vehicle taken. Come on now. 8 Y'all got to do better.</p> <p>9 Q. When did Mohammed testify about the vehicle 10 impoundment?</p> <p>11 A. They went somewhere. I think it was on 12 Superior or something. But Clarissa to better tell you 13 that. I don't -- I wasn't there.</p> <p>14 Q. Did Clarissa say any officer testified --</p> <p>15 A. Mohammed.</p> <p>16 Q. No. I gotta finish.</p> <p>17 Did Clarissa say any other police officer 18 other than Mohammed was at the impoundment hearing?</p> <p>19 A. No. She just told me Mohammed was there, like 20 he was the one that arrested us or something. But he 21 wasn't.</p> <p>22 Q. And what happened to ultimately -- Strike 23 that.</p> <p>24 What ultimately happened to that vehicle?</p>	<p>1 BY THE WITNESS:</p> <p>2 A. I don't know.</p> <p>3 Q. Was there a fine levied that she was supposed 4 to pay?</p> <p>5 MR. TEPFER: Objection: form, calls for 6 speculation.</p> <p>7 Go ahead.</p> <p>8 BY THE WITNESS:</p> <p>9 A. Not that I know of.</p> <p>10 Q. So there was a hearing, and the results of the 11 hearing was the hearing officer said, "Destroy that 12 car." Is that what happened?</p> <p>13 A. I wasn't --</p> <p>14 MR. TEPFER: Objection: calls for speculation.</p> <p>15 BY THE WITNESS:</p> <p>16 A. I wasn't present.</p> <p>17 Q. How do you know anything happened to 18 Clarissa's car?</p> <p>19 A. Because we never got it back.</p> <p>20 Q. Did someone tell you that it was destroyed?</p> <p>21 A. Clarissa said it was destroyed.</p> <p>22 Q. And how did -- Did Clarissa say how she 23 learned of that?</p> <p>24 A. I guess -- I'm guessing. I don't know. But</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 298	Page 300
<p>1 I'm guessing from the hearing. 2 And then when she got exonerated, they never 3 said nothing about replacing her car. Why -- Oh, I'm 4 sorry. 5 Q. So ultimately, you had a court proceeding 6 related to the December 11, 2005, arrest, correct? 7 A. Yes. 8 Q. And you pled guilty? 9 A. Yes. 10 Q. Correct? 11 A. Yes. 12 Q. And you pled guilty before Judge Toomin, 13 right? 14 A. Yes. 15 Q. You were represented by counsel? 16 A. Yes. 17 Q. And you voluntarily pled guilty, right? 18 MR. TEPFER: Objection: calls for a legal 19 conclusion. 20 Go ahead. 21 BY THE WITNESS: 22 A. I pled guilty so that Clarissa wouldn't get 23 any jail time. I didn't want to run the risk of her 24 getting jail time, because I would have fought it. And</p>	<p>1 A. Yeah. 2 Q. Okay. That's -- Okay. And then what did you 3 get for the March 23, 2005? 4 A. Eighteen years. And then Clarissa wrote a 5 letter to the judge, and he rescinded the eighteen years 6 and made it fourteen years for that case. 7 Q. And -- 8 A. Which was the three Olympics AJ promised me. 9 Q. When you -- Ultimately, you got fourteen years 10 for the March 23rd, right? 11 A. Yes. 12 Q. Part of what Judge Toomin had in front of him 13 was also your prior criminal history, right? 14 MR. TEPFER: Objection: calls for speculation. 15 But go ahead. 16 BY THE WITNESS: 17 A. I don't know. 18 Q. Well, let's -- Why don't we talk about -- Give 19 me a second. 20 Mr. Baker, what was the first year that you 21 were convicted of a felony? 22 A. Well, I had probation in -- I think it 23 was '90. And then -- 24 Q. What was the probation in 1990 for?</p>
<p>1 that's why I believe they charged her, so -- But that's 2 just my belief. But I pleaded guilty so that Clarissa 3 wouldn't have to do any time and she'll be there to 4 raise our kids. 5 Q. Was there negotiations that were going on 6 between you and the prosecutor's office? 7 A. I had just got found guilty, and they gave me 8 eighteen years. And I didn't want to risk -- Well, yes, 9 to answer your question. They offered me four years. 10 Q. Who offered you that? 11 A. The State offered me four years. 12 Q. For the December 11, '05? 13 A. Yes. And they offered Clarissa probation. 14 She, to her testament, didn't want to take the plea. 15 But I pleaded with her because I didn't want to see her 16 in jail, albeit for something she didn't do, but in jail 17 nonetheless. And then where would that leave our 18 children? So I said I'll plead guilty and do the four 19 years. 20 Q. But it was a negotiated -- 21 A. Yes. 22 Q. -- plea? You take the four, and they 23 guarantee you that they're going to give Clarissa 24 probation?</p>	<p>1 A. For narcotics. 2 Q. And it was possession of narcotics? 3 A. Yes. 4 Q. What type of narcotics? 5 A. Crack cocaine. 6 Q. And where did you possess the crack cocaine 7 in 1990? 8 A. I didn't possess it. They arrested me and my 9 cousin because they came in my auntie's house and found 10 some drugs, and they took me and my cousin to jail. 11 Q. What -- In Chicago? 12 A. Yes. 13 Q. Ultimately, you pled guilty? 14 A. Yes. 15 Q. And you received probation? 16 A. Yes. 17 Q. And that was a felony? 18 A. I believe so. 19 Q. Okay. So that's your very first conviction? 20 A. That I can recall, yes. 1990. 21 Q. Okay. So then when would have been your next 22 conviction? 23 A. I think later on that year I got another 24 narcotics case, and they gave me extended probation.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 302	Page 304
<p>1 Q. And let me take a step back. The 1990 2 conviction, you were on probation, right? 3 A. Yeah, I got probation for that. 4 Q. And as part of your probation, you were not to 5 engage in illegal narcotics activity, correct? 6 A. Yes. 7 Q. And so this subsequent conviction following 8 the 1990 conviction, you didn't get any jail time; is 9 that correct? 10 A. Right. I got extended probation. I don't 11 really even remember the case. But I got extended 12 probation. 13 Q. What were the circumstances of that arrest? 14 A. I'm not sure. I don't recall it. 15 Q. Then would have -- What would have been then 16 your next conviction after that? 17 A. After that, I believe it was the gun case. 18 Q. It was a felony? 19 A. Yeah. Felony gun case. Yeah. 20 Q. What year was that? 21 A. I'm not sure. I'm thinking '93, or it might 22 have been '92. '93 or '92, somewhere in there. 23 Q. Did you get sentenced to incarceration for 24 that one?</p>	<p>1 time you went to the penitentiary? 2 A. Yes. 3 Q. And did that -- What impact did that have on 4 your relationship with Clarissa? 5 A. She started seeing somebody else because I was 6 gone. She visited me and all that like halfway through, 7 and then she moved on. 8 Q. So were the -- The two sentences for the gun 9 case and the attempt murder, were they concurrent? 10 A. Is that where I did one and then did the 11 other? 12 Q. Well -- 13 A. It was two separate charges. So I didn't get 14 time off at the same time for both of them. I had to do 15 the time for this one, and then I did the time for that 16 one. 17 Q. Okay. And then how long were you actually in 18 the penitentiary before you were released? 19 A. I believe like three years and nine months, 20 something like that. 21 Q. Okay. So then you're released from prison. 22 Where do you go to live? 23 A. I went to Clarissa's house. 24 Q. So you were back together with him -- Or</p>
<p style="text-align: center;">Page 303</p> <p>1 A. Yes. I got -- because I caught that case, the 2 gun case, and then I bonded out. And then I got the 3 attempt murder case, the charge. And ... 4 Q. So was -- When you had the -- When you got 5 caught with the gun, not the attempt murder, when you 6 got caught with a gun, you were on probation? 7 A. No. If I was on probation, they wouldn't have 8 let me bond out. I had completed the extended probation 9 and all -- all the community service that was attached 10 to it. 11 Q. Okay. So you get a gun -- You get the gun 12 case, and you're out on bond for that one. Then you get 13 picked up for the attempt murder? 14 A. Yeah. 15 Q. And you were convicted of attempt murder, 16 right? 17 A. No. I pled guilty. I wasn't -- Well, yes, I 18 guess. 19 Q. Okay. 20 A. I pled guilty to it. 21 Q. And then what happened to the other gun case? 22 A. They gave me two years for it. So I got six 23 for the attempt murder and then two for the gun case. 24 Q. Okay. So now, this would have been the first</p>	<p style="text-align: center;">Page 305</p> <p>1 sorry. 2 A. I got back -- 3 Q. You were back together with her after you were 4 released from your first incarceration? 5 A. Yes. 6 Q. Okay. And you lived with her at the 527 7 building? 8 A. Yes. 9 Q. Apartment 206? 10 A. Yes. 11 Q. Okay. What year was it when you were released 12 from prison? 13 A. I think it was -- I believe it was 14 July 10, '97. 15 Q. Okay. 16 A. I believe it was July 10, '97. 17 Q. I didn't ask you this, but the person who you 18 were -- who you pled guilty to attempting to murder, was 19 he in a gang? 20 A. No, you asked me that. 21 Q. Okay. What was your answer? 22 A. I don't know. 23 MR. TEPFER: Objection: asked and answered. But I 24 don't remember either.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 306	Page 308
<p>1 BY MR. BAZAREK:</p> <p>2 Q. Was he a Gangster Disciple?</p> <p>3 A. I said I don't know.</p> <p>4 Q. Who are the Gangster Disciples' enemy?</p> <p>5 MR. TEPFER: Objection: form.</p> <p>6 BY THE WITNESS:</p> <p>7 A. I don't know, sir.</p> <p>8 Q. Did you ever hear the Vice Lords?</p> <p>9 A. I've heard of Vice Lords.</p> <p>10 Q. Are they an enemy of the Gangster Disciples?</p> <p>11 A. I mean, I couldn't say. I don't -- I don't</p> <p>12 know. There wasn't no Vice Lords in Ida B. Wells.</p> <p>13 Q. They were all Gangster Disciple territory?</p> <p>14 A. In Ida B. Wells?</p> <p>15 Q. Yes.</p> <p>16 A. For the most part, I would say so.</p> <p>17 Q. Okay. So you get released from</p> <p>18 incarceration 1997. You're living back with Clarissa.</p> <p>19 And when is the next time you were convicted?</p> <p>20 A. I believe it was the -- I got probation for, I</p> <p>21 believe.</p> <p>22 Q. For what?</p> <p>23 A. Narcotics.</p> <p>24 Q. Were you selling narcotics?</p>	<p>1 Q. And whatever became of Little Willis?</p> <p>2 A. I don't know. He's still alive. I ain't</p> <p>3 heard about him being dead.</p> <p>4 Q. So when Little Willis made this suggestion to</p> <p>5 you, what did you do?</p> <p>6 A. He asked me could I possibly get narcotics.</p> <p>7 So I checked and said "I got some." And then he wanted</p> <p>8 to -- I used to sell eight balls for them. They</p> <p>9 didn't -- in 527.</p> <p>10 Q. And that's cocaine, eight ball?</p> <p>11 A. Yeah.</p> <p>12 Q. And where would -- And where would you get</p> <p>13 the -- And I'm talking about the 1990s now. Where would</p> <p>14 you get the eight balls of cocaine from to sell?</p> <p>15 A. Here and there.</p> <p>16 Q. Was it a person? You know, you talked about</p> <p>17 individuals who would supply you with cocaine and heroin</p> <p>18 later on. Now I'm talking about the 1990s.</p> <p>19 A. Yeah.</p> <p>20 Q. Who, if you know?</p> <p>21 A. I don't recall. That was a long time ago.</p> <p>22 Q. Can you tell me the name of one person who</p> <p>23 supplied you with cocaine to sell during the 1990s?</p> <p>24 A. Not that I can recall right off, no.</p>
<p style="text-align: center;">Page 307</p> <p>1 A. Yeah.</p> <p>2 Q. Okay. And then where were you selling</p> <p>3 narcotics? At Ida B. Wells?</p> <p>4 MR. TEPFER: Are you asking about this specific</p> <p>5 incident, or what are you asking?</p> <p>6 MR. BAZAREK: Yeah, yeah. Yes.</p> <p>7 BY THE WITNESS:</p> <p>8 A. 527.</p> <p>9 Q. Right. Because I know from your interrogatory</p> <p>10 answers, you said that you were selling narcotics</p> <p>11 beginning in about 1998. Do I have that right?</p> <p>12 A. I believe.</p> <p>13 Q. And then was that the first time you sold</p> <p>14 narcotics at the 527 building?</p> <p>15 A. It was 1998. Yeah.</p> <p>16 Q. How is it that you -- Strike that.</p> <p>17 How did you decide that you were going to sell</p> <p>18 narcotics from the 527 building?</p> <p>19 A. Well, I used to just come in and out the</p> <p>20 building. And one day, a guy named Little Willis, he</p> <p>21 asked me, he's like, "Hey, man, I know you don't know</p> <p>22 me, but do you -- you know where you could get some</p> <p>23 coke? Because ain't no coke out here." I said, "Well,</p> <p>24 I'll see. I don't know." And from there.</p>	<p style="text-align: center;">Page 309</p> <p>1 Q. When you would obtain cocaine to sell at</p> <p>2 Ida B. Wells during the 1990s, where would you go to get</p> <p>3 it?</p> <p>4 A. I don't recall. It was a long time ago, sir.</p> <p>5 It was a long time ago.</p> <p>6 Q. Yeah. Would you -- Well, would you get it</p> <p>7 somewhere within Ida B. Wells, the complex, or would you</p> <p>8 have to go -- "Oh, I gotta go to the suburbs to pick up</p> <p>9 this -- these eight balls of cocaine"?</p> <p>10 A. I don't know. That was a long time ago. I</p> <p>11 don't recall.</p> <p>12 Q. How did you package the eight balls of cocaine</p> <p>13 that you sold in the 1990s?</p> <p>14 A. How would I package the eight balls?</p> <p>15 Q. Yes.</p> <p>16 MR. TEPFER: Objection to form.</p> <p>17 BY THE WITNESS:</p> <p>18 A. In eight balls.</p> <p>19 Q. Would you have to yourself put them in baggies</p> <p>20 to sell?</p> <p>21 A. Yeah, I guess.</p> <p>22 Q. Right. I'm asking you, how would you</p> <p>23 receive --</p> <p>24 A. I said yeah, I guess.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 310	Page 312
<p>1 Q. Okay. And do you remember doing that?</p> <p>2 A. It's been a while. Sometimes I probably</p> <p>3 didn't even use a bag.</p> <p>4 Q. How would you sell it without a bag?</p> <p>5 A. Take it off your scale and put it in his hand.</p> <p>6 Q. And it wouldn't -- It wouldn't have any bag of</p> <p>7 any sort, just powder into someone's hand?</p> <p>8 A. No. Just rock cocaine.</p> <p>9 Q. Rock cocaine. Okay.</p> <p>10 And then where would you sell the rock cocaine</p> <p>11 at Ida B. Wells in the 1990s?</p> <p>12 A. In the hallway.</p> <p>13 Q. And you would have the scale with you?</p> <p>14 A. Yeah.</p> <p>15 Q. To weigh it?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. Did you have -- make good business?</p> <p>18 MR. TEPFER: Objection to form.</p> <p>19 Go ahead.</p> <p>20 BY THE WITNESS:</p> <p>21 A. I guess not.</p> <p>22 Q. Would you -- Would you call the rock cocaine</p> <p>23 that you sold in the 1990s a certain name?</p> <p>24 A. No.</p>	<p>1 A. I don't know.</p> <p>2 Q. Can you estimate?</p> <p>3 A. No.</p> <p>4 Q. Okay. Other than rock cocaine, did you sell</p> <p>5 any other narcotics at Ida B. Wells during the 1990s?</p> <p>6 A. No.</p> <p>7 Q. Did you ever pay taxes on any of the money you</p> <p>8 received for the rock cocaine that you sold during the</p> <p>9 1990s?</p> <p>10 A. Who would I pay taxes to?</p> <p>11 Q. So your answer is no?</p> <p>12 A. No, I didn't.</p> <p>13 Q. Okay. All right. Let's go into the -- I</p> <p>14 didn't ask you this: When would have been your next</p> <p>15 conviction after you were released from prison? I</p> <p>16 believe you said it was 1997. Do I have that right?</p> <p>17 A. Yeah. I was released in '97.</p> <p>18 Q. Okay. So when would you have picked up your</p> <p>19 next conviction, felony conviction?</p> <p>20 A. If I'm not mistaken, I believe it was either</p> <p>21 2001 or 2002. I'm not sure, though.</p> <p>22 Q. And what were the circumstances that led up to</p> <p>23 that conviction?</p> <p>24 A. Narcotics.</p>
<p style="text-align: center;">Page 311</p> <p>1 Q. Did anyone help you or assist you in selling</p> <p>2 rock cocaine in the 1990s out of Ida B. Wells?</p> <p>3 A. No.</p> <p>4 Q. So you were just -- You were a one-man</p> <p>5 operation?</p> <p>6 A. Yeah.</p> <p>7 Q. What's the most money you ever made in a year</p> <p>8 in the 1990s while you sold rock cocaine?</p> <p>9 A. I don't know. I don't know.</p> <p>10 MR. TEPFER: Just object to the characterization of</p> <p>11 the 1990s. It's not --</p> <p>12 BY MR. BAZAREK:</p> <p>13 Q. Well, you sold cocaine -- rock cocaine in the</p> <p>14 1990s at Ida B. Wells, true?</p> <p>15 A. Yeah.</p> <p>16 Q. Okay. Your interrogatory answers --</p> <p>17 A. I said yes. I said I don't know --</p> <p>18 Q. Okay.</p> <p>19 A. -- how much money was made.</p> <p>20 Q. In 1998, how much income did you earn from</p> <p>21 selling rock cocaine?</p> <p>22 A. I don't know.</p> <p>23 Q. In 1999, how much money did you make selling</p> <p>24 rock cocaine?</p>	<p style="text-align: center;">Page 313</p> <p>1 Q. What type of narcotics?</p> <p>2 A. Cocaine.</p> <p>3 Q. Crack cocaine?</p> <p>4 A. Yeah.</p> <p>5 Q. Okay. And you were selling it, right?</p> <p>6 A. I had it.</p> <p>7 Q. Who arrested you?</p> <p>8 A. I don't even know their name.</p> <p>9 Q. Chicago police officers?</p> <p>10 A. Yeah.</p> <p>11 Q. Yes?</p> <p>12 A. Yeah.</p> <p>13 Q. Do you remember where you were when you were</p> <p>14 arrested?</p> <p>15 A. 527.</p> <p>16 Q. Do you recall, were you in the lobby? Were</p> <p>17 you in a stairwell? Were you --</p> <p>18 A. Well, they wrote it up like I was in the</p> <p>19 lobby. And then they -- When they -- They took me to</p> <p>20 the substation. But Clarissa had called the lawyer, and</p> <p>21 the lawyer got to the police station before them. So</p> <p>22 they tore up that report and rewrote it like they got me</p> <p>23 out the house with the drugs.</p> <p>24 Q. But you had rock cocaine with you, right?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 314</p> <p>1 A. Yeah.</p> <p>2 Q. Where did you get the rock cocaine from?</p> <p>3 A. I don't recall.</p> <p>4 Q. Can you identify -- Or strike that.</p> <p>5 You said that was in 2000 or 2001?</p> <p>6 A. I said I believe it was --</p> <p>7 MR. TEPFER: Objection to the form -- the</p> <p>8 mischaracterized testimony.</p> <p>9 BY MR. BAZAREK:</p> <p>10 Q. Go ahead.</p> <p>11 A. I believe it was 2001 or 2002.</p> <p>12 Q. Okay.</p> <p>13 A. But I'm not --</p> <p>14 Q. Okay.</p> <p>15 A. -- sure.</p> <p>16 Q. And then what was the result of that arrest?</p> <p>17 A. I received the probation, the gang intensified</p> <p>18 probation.</p> <p>19 Q. So no jail time?</p> <p>20 A. Right.</p> <p>21 Q. And that was two years of probation you</p> <p>22 received?</p> <p>23 A. Yes.</p> <p>24 Q. Does that sound right?</p>	<p style="text-align: center;">Page 316</p> <p>1 Q. So what time period were you selling heroin at</p> <p>2 Ida B. Wells during the 2000s?</p> <p>3 A. I think -- I'm trying to see was it, like,</p> <p>4 after I got shot. I believe it was after I got shot.</p> <p>5 Q. That's when you first started selling heroin?</p> <p>6 A. Yeah.</p> <p>7 Q. Had you ever possessed heroin prior to being</p> <p>8 shot?</p> <p>9 A. I don't know.</p> <p>10 Q. Had you ever sold heroin at any time prior to</p> <p>11 being shot?</p> <p>12 MR. TEPFER: Sorry.</p> <p>13 BY THE WITNESS:</p> <p>14 A. Probably so. But like I said, it was a long</p> <p>15 time ago.</p> <p>16 Q. Did you sell heroin at Ida B. Wells during</p> <p>17 the 1990s?</p> <p>18 A. No.</p> <p>19 Q. So the heroin that you sold at Ida B. Wells</p> <p>20 was only during the 2000s, correct?</p> <p>21 A. I believe so.</p> <p>22 Q. Okay. So now, when did you get shot?</p> <p>23 A. Really, I -- I think it was 2002. But I'm not</p> <p>24 sure. It was a long time ago.</p>
<p style="text-align: center;">Page 315</p> <p>1 A. Sound right. Two years of gang intensified</p> <p>2 probation.</p> <p>3 Q. Okay. During the time when you were on</p> <p>4 probation following that 2002 conviction, you continued</p> <p>5 to sell narcotics at Ida B. Wells, right?</p> <p>6 A. No. I was scared.</p> <p>7 Q. So you took a break?</p> <p>8 A. Yeah, I took a break --</p> <p>9 Q. What was --</p> <p>10 A. -- for a while. I was scared.</p> <p>11 Q. Well, you were on probation, right?</p> <p>12 A. Yeah.</p> <p>13 Q. You don't want to go back to prison?</p> <p>14 A. Yeah. I took a break. I was scared.</p> <p>15 Q. So when would you have next sold narcotics</p> <p>16 following your 2002 conviction for which you received</p> <p>17 two years' probation?</p> <p>18 A. I'm really not sure because I know I had got</p> <p>19 shot. I'm really not sure. But I know it's in one of</p> <p>20 these papers. But I can't just say when. I don't</p> <p>21 recall exactly when or roughly when.</p> <p>22 Q. Well, you sold heroin at Ida B. Wells during</p> <p>23 the 2000s, right?</p> <p>24 A. Yeah.</p>	<p style="text-align: center;">Page 317</p> <p>1 Q. Who shot you?</p> <p>2 A. I didn't see where the bullet came from. I</p> <p>3 just heard the shot.</p> <p>4 Q. Did you ever learn who shot you?</p> <p>5 A. No.</p> <p>6 Q. No one ever said anything about who shot you?</p> <p>7 A. Nobody ever went to jail for it.</p> <p>8 Q. Who were you with when you got shot?</p> <p>9 A. I was with my friend. I had met him when he</p> <p>10 got off work. And we was coming across from out the</p> <p>11 school. We came out the school. And then there was</p> <p>12 some guys come running from behind the building coming</p> <p>13 towards us. And then you hear the gunshot. Pow. So we</p> <p>14 turned to try to really, like, get out their path. And</p> <p>15 you hear another shot. Pow. And it just felt like I</p> <p>16 just stepped into the ground. And then once I went</p> <p>17 down, they stopped shooting. And I look over, and my</p> <p>18 leg is, like -- is just hanging on by a tendon -- by the</p> <p>19 tendon. It was all -- All the bone was shattered from</p> <p>20 above the knee up to my thigh.</p> <p>21 Q. Was there a fight going on between two groups?</p> <p>22 A. I don't know. I walked -- I walked up, and I</p> <p>23 heard gunshots. As soon as we came through the gate and</p> <p>24 stepped into the street, you heard the first shot. Pow.</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 318	Page 320
<p>1 Because the guys was running. I don't know who was 2 shooting at them, none of that. I just know when I 3 turned to get out the way, I heard another shot. Pow. 4 And I got hit on the inside of my thigh.</p> <p>5 Q. And what thigh? What side? Right or left?</p> <p>6 A. Right.</p> <p>7 Q. Did the police ever interview you as a victim 8 of that shooting?</p> <p>9 A. Yeah.</p> <p>10 Q. What did you tell the police?</p> <p>11 A. Same thing I just told you.</p> <p>12 Q. Did they --</p> <p>13 A. I don't know who shot me. I told them the 14 circumstance. And they actually -- They had arrested my 15 friend for shooting me, the guy that I was with, because 16 they -- he was running, which both of us was trying to 17 run, but I got shot. And he made it up to 35th. And 18 they arrested him on 35th Street because they thought he 19 shot me.</p> <p>20 Q. Who was your friend?</p> <p>21 A. His name College Boy.</p> <p>22 Q. What's his real name?</p> <p>23 A. I don't know his real name. I just know him 24 by College Boy.</p>	<p>1 Q. So do you think whoever was shooting was 2 shooting at someone else and they just shot you, or they 3 were trying to shoot you?</p> <p>4 A. It was some guys running, so I believe that's 5 who they was shooting at. I don't think nobody was 6 shooting at me.</p> <p>7 Q. Okay.</p> <p>8 A. Why would they?</p> <p>9 Q. So you were just -- You were in the wrong 10 place at the wrong time?</p> <p>11 A. That's what I believe.</p> <p>12 Q. Did that cause stress in your life, having a 13 badly injured thigh?</p> <p>14 A. Yeah, because I had to go through therapy. 15 And then my right leg now is shorter than my left leg, 16 so it cause me back pain every now and then. I gotta 17 wear a boot with the extension on it when I'm not trying 18 to look fashionable.</p> <p>19 Q. What impact did that shooting have on your 20 family, your --</p> <p>21 A. Well, I couldn't --</p> <p>22 Q. -- Clarissa and the kids?</p> <p>23 A. I couldn't just get out and run and be active 24 with my kids because I couldn't, like, run right because</p>
Page 319	Page 321
<p>1 Q. When is the last time you had any interactions 2 with College Boy?</p> <p>3 A. It's been a long time. Maybe -- Well, I think 4 the last time I seen College Boy was -- They have a 5 Father's Day picnic out south. I think I seen him 6 there. But I think it was like -- 2021 I believe was 7 the last time I was there, either 2021 or 2020, 8 Father's Day.</p> <p>9 Q. When you got shot, did you have a gun with 10 you?</p> <p>11 A. No.</p> <p>12 Q. Had you been in any type of fights, 13 altercations, or anything at any time prior to you being 14 shot?</p> <p>15 A. No, I wasn't into it with nobody, that I knew 16 of.</p> <p>17 Q. Did -- Was anything being said by anyone when 18 the gunfire erupted?</p> <p>19 A. I don't know. I just saw the guys running. 20 They came from behind 527 running, and I'm coming 21 towards. So when I see them running, I hear the shot. 22 (Verbally indicating.) So I turned to get really out 23 their path. And the other shot went off, like I said, 24 and I went down.</p>	<p>1 I got the rod in my leg. I couldn't -- I had lost some 2 of the motion as far as bending it. I couldn't bend it 3 as far as I could do this one. You know, so this one 4 really is like a kickstand. That's how I describe it. 5 I just use it to stop from falling.</p> <p>6 Q. After you got shot, did you need --</p> <p>7 A. Crutches.</p> <p>8 Q. -- a cane or crutches to get around?</p> <p>9 A. I was on -- I was on crutches for a while.</p> <p>10 Q. Okay. So I want to go back to -- At this 11 deposition, is it your memory that -- you do recall 12 selling heroin after you were shot?</p> <p>13 MR. TEPFER: Objection to the form of the question. 14 I don't understand it.</p> <p>15 BY MR. BAZAREK:</p> <p>16 Q. Here. I'll ask another -- I'll ask a 17 question.</p> <p>18 Mr. Baker, after you were shot, I understand 19 you're going to recuperate from your injury. But you 20 sold heroin at Ida B. Wells after you had suffered that 21 gunshot wound, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And then the heroin that you would 24 receive during that time period after you got shot,</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 322	Page 324
<p>1 where would you get the heroin from?</p> <p>2 A. After I got shot, I used to get heroin from</p> <p>3 Bernard Harvey.</p> <p>4 Q. Bernard Harvey?</p> <p>5 A. Yeah.</p> <p>6 Q. Is he still alive?</p> <p>7 A. Yeah.</p> <p>8 Q. Is he still supplying heroin to people?</p> <p>9 A. I don't know.</p> <p>10 Q. And where did Bernard Harvey live?</p> <p>11 A. I don't know where he lived.</p> <p>12 Q. Okay. And how would you get the heroin from him to sell?</p> <p>13 A. I would go get it.</p> <p>14 Q. Where would you get it from?</p> <p>15 A. Wherever he said meet him at.</p> <p>16 Q. Okay. Did he live in Ida B. Wells?</p> <p>17 A. No.</p> <p>18 Q. Do you know where he lived?</p> <p>19 A. No.</p> <p>20 Q. Was he a Gangster Disciple?</p> <p>21 A. I don't know.</p> <p>22 Q. Was he older than you?</p> <p>23 A. I think we about the same age.</p>	<p>1 Q. During the time -- Let's go with the 2000s.</p> <p>2 A. 2000 what?</p> <p>3 Q. Just during that decade. Well, here. I'll do this: Between --</p> <p>4 A. Because half of that decade, I was in jail.</p> <p>5 Q. Between -- Between -- Right. So after you get out of jail -- Or strike that. No.</p> <p>6 You get probation in 2002, right? You didn't go to jail? You were on probation?</p> <p>7 A. I believe.</p> <p>8 Q. Right?</p> <p>9 A. Yeah.</p> <p>10 Q. And then when you got shot, were you on probation?</p> <p>11 A. I don't think so.</p> <p>12 Q. Okay. So let's focus on this period: 2002 through 2005, did you receive heroin from anyone other than Bernard Harvey to sell?</p> <p>13 A. In 2005?</p> <p>14 Q. Let me -- Let's break it down. You're right. I'll stop -- Let me go back.</p> <p>15 From 2002 to -- through 2004, did you receive heroin to sell from anyone other than Bernard Harvey?</p> <p>16 A. Yeah. I used to get heroin from my cousin</p>
<p style="text-align: center;">Page 323</p> <p>1 Q. Did Bernard Harvey ever have a nickname?</p> <p>2 A. Bird.</p> <p>3 Q. Bird?</p> <p>4 A. Yes.</p> <p>5 Q. Anyone else you would receive heroin from other than Bernard Harvey after you had been shot?</p> <p>6 A. No.</p> <p>7 Q. Who would help you sell the heroin during the time period when you sold heroin after you had been shot?</p> <p>8 A. Bryant Patrick and Elgen Moore.</p> <p>9 Q. Were you still selling crack cocaine as well after you were shot?</p> <p>10 A. Yeah.</p> <p>11 Q. And Bryant Patrick and Elgen would continue to sell those narcotics for you?</p> <p>12 A. Yes.</p> <p>13 Q. And then they would enlist other people to help facilitate in the narcotics operation?</p> <p>14 MR. TEPFER: Objection: asked and answered.</p> <p>15 Go ahead.</p> <p>16 BY THE WITNESS:</p> <p>17 A. I don't know who they would get because I would leave. I wouldn't be there.</p>	<p style="text-align: center;">Page 325</p> <p>1 Eddie.</p> <p>2 Q. During that time period, too?</p> <p>3 A. I believe.</p> <p>4 Q. And would you get it from both Eddie and Bernard?</p> <p>5 A. No. I would get it from Eddie first. And then when I got shot, I had stopped. Then when I started back, I would get it from Bernard.</p> <p>6 Q. Okay. When you started back selling heroin again?</p> <p>7 A. Yeah. After I -- Yeah.</p> <p>8 Q. Okay. And then after you got shot and you started back selling narcotics, who would you get the crack cocaine from?</p> <p>9 A. I wasn't really selling the crack cocaine then. I was trying to focus on the heroin. So really, if somebody was in there selling crack, they really was selling it for theirself. But people just assumed it was mine.</p> <p>10 Q. After the probation that you received in 2002, when would you have gotten your next conviction?</p> <p>11 A. After the probation, enter Watts. So I guess I went back to prison in 2006.</p> <p>12 Q. All right. So it's your testimony, then, that</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 326	Page 328
<p>1 your next conviction following your 2002 probation was 2 from an arrest made by Ron Watts's team?</p> <p>3 A. I believe so, yes.</p> <p>4 Q. Okay. I know we didn't -- There's one thing 5 we didn't talk about earlier in the deposition. There 6 was a gun task force that visited your home --</p> <p>7 A. Yeah.</p> <p>8 Q. -- and --</p> <p>9 A. At the be- -- Oh, okay.</p> <p>10 Q. And was that 2005?</p> <p>11 A. I'm not sure exactly when it was.</p> <p>12 Q. Was it before your mom's birthday in March 13 of --</p> <p>14 A. I'm not sure.</p> <p>15 Q. -- of 2005 or before --</p> <p>16 A. I think it was --</p> <p>17 Q. -- or after?</p> <p>18 A. I think it -- it might have been 2004. I'm 19 not sure.</p> <p>20 Q. Tell me about the circumstances of the gun 21 task force visiting your apartment.</p> <p>22 A. We're in the house. Me, Clarissa, and our 23 three boys, we're in the house. She had cooked dinner, 24 so we sitting at the table to eat. Then you hear boom,</p>	<p>1 that she consented for them to search. I said, "Don't 2 sign nothing. They ain't find nothing in here. They 3 don't need you signing nothing." So they said, "Well, 4 we gonna take you to jail for them bullets, and you can 5 get five years for each bullet."</p> <p>6 Q. Take who to jail?</p> <p>7 A. Me.</p> <p>8 Q. Did you have an FOID card?</p> <p>9 A. No.</p> <p>10 Q. Have you ever had an FOID card?</p> <p>11 A. No.</p> <p>12 Q. Okay.</p> <p>13 A. Was my fingerprints on them bullets? No. 14 Were they my bullets? No. But they took me for it. So 15 we leave. They leave. We go downstairs. So they put 16 me in the car. And then here come Watts --</p> <p>17 Q. Who put you in the car?</p> <p>18 A. The gun task force guy.</p> <p>19 Q. Okay.</p> <p>20 A. I got in the car with a sergeant. I believe 21 he was a sergeant for that gun task force. And while 22 I'm in the car, Watts and AJ walk up. So he was like, 23 "Man, y'all sent us up there, and ain't nothing up 24 there."</p>
<p style="text-align: center;">Page 327</p> <p>1 boom, boom, boom, boom. Police knocking on the door. 2 We're like, "Who is it?" It's like, "The police." And 3 my favorite thing to say, "I ain't call the police." So 4 they knock on the door again. Boom, boom, boom, boom, 5 boom. So I open the door. But we had the gate on the 6 door so they couldn't just get in. And they like -- 7 They say, "You got guns up here" and this and that.</p> <p>8 Q. Did you know these officers?</p> <p>9 A. No. I had never seen this particular group of 10 officers before.</p> <p>11 Q. Were they plainclothes or uniform?</p> <p>12 A. Uniform. So they like, "You got guns." I'm 13 like, "Ain't no guns up in here." So we let them in 14 because we know ain't no guns in there. They come in. 15 They put me in handcuffs for my safety and theirs. Then 16 they start searching. They searching. They searching. 17 They don't find nothing. So they -- Well, they found 18 some bullets on top of the snake tank, which was 19 Clarissa's dad's bullets. His badge was in there and 20 some other things, his ID because he used to be a 21 sheriff. So all of us in there stating that it, you 22 know, was his, but she kept it, like, I guess as a 23 memento because her dad had passed.</p> <p>24 So they tried to get her to sign the paper</p>	<p style="text-align: center;">Page 329</p> <p>1 Q. Who said that? One of the task force members?</p> <p>2 A. Yeah.</p> <p>3 Q. The sergeant?</p> <p>4 A. No, not the sergeant. One of the -- I think 5 he was a lieutenant because him and Watts, like, got 6 into a, like, hands-on altercation where they grab each 7 other. I believe they threw punches and --</p> <p>8 Q. You saw punches thrown?</p> <p>9 A. Yes. I'm in the car. I'm in the back seat of 10 the car. And then they -- the sarge was like, "Take him 11 away." So they drove me down to 37th Street, and we sat 12 there. And then they called and said, "Come back." So 13 we went back. And they was still arguing and stuff.</p> <p>14 Q. Who is arguing?</p> <p>15 A. Watts and the gun task force people. They 16 arguing.</p> <p>17 So we go -- Now they racing to get to 18 51st Street. They trying to beat each other to 19 51st Street. And this was when the Sox was playing in 20 the World Series because it was a lot of officers with 21 gold badges and white shirts came to 51st Street. I'm 22 guessing they came from the game. But when we get 23 there, the white shirts, they come in. They ask me what 24 I saw, and I told them. They had me write down what I</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 330	Page 332
<p>1 saw. I wrote that down. But I ain't hear nothing else 2 about that.</p> <p>Q. What did you write down as to what you saw?</p> <p>4 A. I saw AJ and Watts walk up. And the little 5 short guy with the white hair, which I'm thinking was 6 the lieutenant, he said, "Y'all sent us up there, and 7 ain't shit up there." They like, "Did you search this? 8 Did you search that?" And, "Y'all sent us up there. 9 Wasn't nothing up there. We searched everything." And 10 then they started arguing. And then next thing I know, 11 they tussling and throwing punch. And then the sarge 12 like, "Drive him away from here."</p> <p>Q. Did Jones throw any punches?</p> <p>14 A. It was just -- Didn't nobody throw punches but 15 Watts and the little short guy.</p> <p>Q. And were they -- were they connecting?</p> <p>17 A. I mean, I only seen one punch a piece. But I 18 seen Watts grabbed him by his neck. And he swung on 19 Watts. And Watts swung back. And then they broke it 20 up. And that's what I wrote.</p> <p>Q. Did Watts or Jones say anything to you at the 22 scene?</p> <p>23 A. I was in the police car.</p> <p>Q. Okay. Other than the game -- Strike that.</p>	<p>1 going to show up and they're assigned here, I'm going to 2 SOL the case." So when he SOL'd the case, then I caught 3 another case with Watts and them, and they brought that 4 case back up.</p> <p>Q. What's the other case with Watts that you're 6 referring to just now?</p> <p>7 A. I'm not sure. But I know I caught a case with 8 Watts and them. And they brought that -- the bullet 9 case back up. Well, they called it a UUW. And they 10 brought that back up.</p> <p>Q. Did anyone -- I know that the officers on the 12 gun task force didn't show up to court. Did anyone 13 ever -- Other than the judge, did anyone ever tell you, 14 like, how it was that the case got dismissed or why the 15 officers didn't show up?</p> <p>16 A. He said, "They assigned to this building, to 17 this precinct, and they didn't bother to show up to 18 court." But they said they wasn't coming to court. On 19 51st Street when they got into it with Watts, they said 20 they wasn't coming to court.</p> <p>Q. Oh, okay. I missed that. So what was said at 22 51st Street?</p> <p>23 A. They said, "Fuck him. He going to send us 24 through all this bullshit, we not even coming to court."</p>
<p style="text-align: center;">Page 331</p> <p>1 Other than the gun task force, did any other 2 officers enter your apartment that day?</p> <p>3 A. No.</p> <p>4 MR. TEPFER: Hold on one second.</p> <p>5 How much time is there?</p> <p>6 THE VIDEOGRAPHER: You're at 6 hours and I believe 7 24 minutes.</p> <p>8 BY MR. BAZAREK:</p> <p>9 Q. Okay. What -- And you were arrested?</p> <p>10 A. Yes. And charged with the bullets. And 11 they -- I had to go to court on -- I think it was 12 Harrison and Kedzie. I'm not sure. But they took me 13 from the County. I was transported from the County to 14 Harrison and Kedzie. But the officers didn't show up to 15 court. So the judge was like, "This task force is 16 assigned here. They didn't come to court." So he SOL'd 17 the case.</p> <p>18 Q. So when you were arrested for that event, did 19 you I-bond out, or did you have to see a judge in the 20 morning?</p> <p>21 A. No. I stayed in jail for like 30-something 22 days. And I went to the -- for the preliminary hearing, 23 and the officers didn't show up. And they was assigned 24 there. So the judge was like, "Well, if they ain't</p>	<p style="text-align: center;">Page 333</p> <p>1 And they didn't come to court. And the judge SOL'd it. 2 Instead of just dismissing it, he SOL'd it.</p> <p>3 Q. Did you see Officer Jones back at 51st Street 4 following the arrest where you had the -- or arrested 5 for the bullets?</p> <p>6 A. No. I didn't see him or Watts. I saw the 7 officers. I guess they was high-ranking officers 8 because they came in and asked me what happened. They 9 had on the white shirts with the gold and the hat with 10 the gold in it.</p> <p>11 Q. Do you remember any of their names?</p> <p>12 A. No.</p> <p>13 Q. Okay. Let me ask you about Mother's Day 2004. 14 Do you remember that day?</p> <p>15 A. Yes.</p> <p>16 Q. What do you remember about that day?</p> <p>17 A. I remember I went downstairs to smoke, really, 18 because I'm waiting on Clarissa and the boys to come 19 down because we was taking Clarissa to breakfast, like 20 we normally do on Mother's Day. So I'm on the back of 21 the building. There's nobody back there. And then 22 Watts come walking between 559 and 540. And he see me. 23 And he like, "Ben," he said, "I've been up all night. I 24 lost my money. I ain't got nothing to give my momma for</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 334	Page 336
<p>1 Mother's Day. You're going to pay me or your ass going 2 to jail." I said, "I ain't paying you shit. What I'm 3 paying you for?" He said, "Yeah. All right. Your ass 4 going to pay me or you going to jail."</p> <p>5 So I start walking off, and he walking behind 6 me. And he followed me from the back of 527 around, 7 because I walked on the concrete, around to Browning and 8 then back up the fire lane. As I'm coming up the fire 9 lane, he coming behind me, and Clarissa and the boys 10 coming out the building. And he still talking. I'm 11 like, "Man, fuck you. Do your job." And Clarissa was 12 like, "Who is that?" I said, "The police." And we get 13 in the car, and I stomped off.</p> <p>14 Q. Was Watts with anyone?</p> <p>15 A. Watts was alone.</p> <p>16 Q. Did you see any members of Watts's team on Mother's Day 2004?</p> <p>18 A. At that time, Watts was alone.</p> <p>19 Q. Did you see any other officers at any time during that day --</p> <p>21 A. I don't -- I don't know.</p> <p>22 Q. -- Mother's Day?</p> <p>23 A. I know at that time, Watts was alone.</p> <p>24 Q. So it was just you and him?</p>	<p>1 the van. And Gonzalez and Bolton and Cadman were part 2 of that team.</p> <p>3 Q. All right. But you don't -- As you sit here at this deposition, you don't know --</p> <p>5 A. I can't say Gonzalez did it; Bolton did it. I 6 can't say which one of them actually put the board over 7 the door and shut the gate, locking me and my kids in 8 there. I can't say who actually did that. But I know 9 once they left, I think it was Pat or Maurice that came 10 up and moved it off the door so we could get out.</p> <p>11 Q. Do you know what year that was?</p> <p>12 A. No. Not right off, no.</p> <p>13 Q. All right. So any other negative interactions you had with --</p> <p>15 A. Other than -- Other than --</p> <p>16 Q. -- any of the officers, you know, when they were working in uniform?</p> <p>18 A. Other than that, no. It was -- It didn't get 19 negative until they became part of Watts' team, other 20 than them putting the -- on the door.</p> <p>21 Q. But any negative interactions you had with individuals who worked on Watts's team would have occurred -- Strike that.</p> <p>23 Other than that incident with the door, any</p>
Page 335	Page 337
<p>1 A. Yeah.</p> <p>2 Q. Prior to Mother's Day 2004, had you ever had contact with the officers who worked for Sergeant Watts?</p> <p>4 A. Well, as I say, Gonzalez and Bolton used to be 5 in the alligator, the white police van. They was 6 blue-and-white. And when AJ first came around, he used 7 to be in a blue-and-white uniform, too. So, yeah. But 8 they wasn't with Watts, I would say, because they were, 9 like, in uniform all the time.</p> <p>10 Q. Okay. So prior to -- Or strike that.</p> <p>11 During those times where Officer Jones would work in uniform, Officer Bolton in uniform --</p> <p>13 A. Kenneth Young.</p> <p>14 Q. -- Officer Gonzalez in uniform, did you have any negative interactions with them?</p> <p>16 A. Well, with Gonzalez and Bolton and whoever 17 used to be in the van with them, one time they knocked 18 on the door, and I didn't let them in. So they put 19 the -- it was, like, a big old piece of plywood. They 20 put that over the door, and then they shut my gate 21 around it.</p> <p>22 Q. Who did?</p> <p>23 A. Them. I don't -- I can't say specifically 24 which one it was. But it was the people that jumped out</p>	<p>1 negative interactions you would have had with the individuals who worked for Sergeant Watts's team would have occurred after Mother's Day of 2004, correct?</p> <p>4 A. Other than when they was with Sergeant Ramirez 5 and they came and brought the dog in my house and 6 everything, other than that. But they said they smelled 7 marijuana, which they did. But it was marijuana being 8 smoked all through the building. People was all in the 9 hallway. But since I was standing in my doorway fixing 10 my son's wheel, they --</p> <p>11 Q. Okay. I missed this one. Who came in with Sergeant Ramirez?</p> <p>13 A. Bolton, Gonzalez, Cadman. And then I don't 14 remember the names of the -- It was a little short Black 15 guy. He had a little thick mustache. He used to be 16 with Mohammed. He used to ride with Mohammed first in 17 the blue-and-white car. But he no -- He was no longer 18 on the team after a while either.</p> <p>19 Q. And that -- What you're describing --</p> <p>20 A. This is when they was with Sergeant Ramirez.</p> <p>21 Q. Okay. But that's the same incident you're talking about with the board --</p> <p>23 A. No.</p> <p>24 Q. -- on your door?</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

<p style="text-align: center;">Page 338</p> <p>1 It's a different incident? 2 A. Yeah. 3 Q. Okay. When did that incident occur? 4 A. That happened I want to say after the board 5 incident, because it's like when they jumped out the 6 van, I'm looking out the window. And then my son came 7 in, and he was like, "My wheel popped off" on his 8 scooter. So I'm standing in the doorway putting it on. 9 And it's like they came right up there. But I guess 10 they could have been going through the building. But it 11 was people all downstairs. They was having dice games 12 and everything. And they came. Now all the officers 13 that's in the building is now inside of 206. And they 14 was all uniformed officers. They searching. They 15 searching. And only thing they found was a bag of 16 reefer that my cousin's boyfriend had in his pocket. 17 And they took him to jail for that. 18 Q. Do you know an individual who goes by the name 19 Danny Hopkins? 20 A. Danny Hopkins? Probably by face. 21 Q. Was there -- Or a guy -- Same guy with the 22 nickname of Chewbacca? 23 A. Chewbacca. I haven't heard that name. 24 Q. Or the dumpster guy?</p>	<p style="text-align: center;">Page 340</p> <p>1 Q. Who was Shock? 2 A. Shock used to -- He was over there. And they 3 say he used to pay Watts. That's what they say. 4 Q. Who said that? 5 A. A lot of people. 6 Q. Did anyone say Roy Bennett -- Or strike that. 7 Did anyone -- Did you ever hear anyone say 8 that Shock paid anyone else? 9 A. I don't know. I heard a story about -- Well, 10 it's just all hearsay. So I don't know. I didn't see 11 him -- 12 Q. What's the hearsay you heard? 13 A. -- pay him. 14 I'd rather not say because I didn't see it. I 15 didn't witness it. 16 Q. Well, is it involving the members of Watts's 17 team? 18 A. Maybe. 19 Q. Okay. So which ones? 20 A. It was Watts, and then it was a lieutenant. 21 It was a lieutenant in the car with Watts. And word has 22 it that they -- the lady brought a bag of money out to 23 the car and said, "Here, Watts. This from Shock." And 24 Watts was like, "Uh-uh. I don't -- What is you talking</p>
<p style="text-align: center;">Page 339</p> <p>1 A. The dumpster guy? 2 Q. Did you ever hear anyone called the dumpster 3 guy? 4 A. No. Not -- No. But probably if I see the 5 person, I might know him. But by that name, Danny, 6 dumpster guy, Chewbacca, no. 7 Q. Did you know someone named Wilbert Moore? 8 A. Yeah. 9 Q. Who is Wilbert Moore? 10 A. Well, his cousin has a baby by my sister. 11 Q. Who is the cousin? 12 A. Frank Lee. 13 THE REPORTER: I'm sorry. 14 THE WITNESS: Frank Lee. 15 Wilbert dead now. 16 BY MR. BAZAREK: 17 Q. How about Patrick Nooner? Did you know him? 18 A. Yeah. 19 Q. Was he a supplier for narcotics? 20 A. I mean, he never supplied me. 21 Q. How about Roy Bennett? You know Roy Bennett? 22 A. No. 23 Q. Did you know anyone named Shock? 24 A. Yeah. Shock.</p>	<p style="text-align: center;">Page 341</p> <p>1 about? I don't want that," I guess because the 2 lieutenant was in the car. 3 Q. Oh, so he didn't take the money? 4 Who was the person who had the bag of money? 5 A. All I knew was they say it was a lady. 6 Q. Okay. Do you know anyone named Harold Seales? 7 A. If that's Harry that's dead now. 8 Q. How about Harold Owens? Do you know him? 9 A. Yeah. He dead, too. 10 Q. Do you know anyone named Charlene Campbell? 11 A. Probably by face. 12 Q. How about Francine Osborn? Do you know that 13 name? 14 A. Francine Osborn. I can't say. 15 Q. Yeah. Was there -- Did you know any of the 16 people who managed the 527 building? 17 A. Oh, Ms. Osborn? 18 Q. Yes. 19 A. Yeah. She was the manager, and she used to be 20 the office in 511 when I used to take the rent over 21 there sometimes for Clarissa. That was the lady they 22 say used to give Watts keys to people's apartment. 23 Q. Did you ever see that or ... 24 A. That's just what they say. But -- because</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 342	Page 344
<p>1 they went over there asking for my key, but they didn't 2 have a key because we had -- she had the -- she had the 3 janitor change our locks for us because I think a key 4 got broke up in there. And when he changed the locks, 5 he gave us the copies of the keys. So it was never a 6 set in the office.</p> <p>7 Q. How about -- You know someone named 8 Charles Lawrence?</p> <p>9 A. Yeah.</p> <p>10 Q. Who is Charles Lawrence?</p> <p>11 A. That one, I went to school with him.</p> <p>12 Q. Does he go by Charles Miller, too, different 13 name?</p> <p>14 A. No.</p> <p>15 Q. Okay.</p> <p>16 A. Charles -- It was another Charles that used to 17 work with Watts. He was, like, an informant through 18 there, I guess. And when the mailbox case happened, he 19 came to the house early in the morning one time at 20 6:00 something.</p> <p>21 Q. Who came to the house?</p> <p>22 A. Charles.</p> <p>23 Q. Charles Lawrence?</p> <p>24 A. I'm -- That's what -- I assumed his name was</p>	<p>1 I really, like, probably went to school with his 2 brother. But we all went to Doolittle.</p> <p>3 Q. Okay. And so you talked about someone showing 4 up at 6:00 in the morning?</p> <p>5 A. Yes.</p> <p>6 Q. It was Charles?</p> <p>7 A. Not him.</p> <p>8 Q. A different person?</p> <p>9 A. Yeah.</p> <p>10 Q. Okay. And tell me what happened.</p> <p>11 A. He knocked on the door, and he said --</p> <p>12 Q. This is at the 527 building?</p> <p>13 A. Yes.</p> <p>14 Q. Apartment 206?</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 A. During the --</p> <p>18 MR. TEPFER: Date or time or no? I don't -- Do we 19 have foundation here?</p> <p>20 THE WITNESS: I don't know exactly what day.</p> <p>21 BY MR. BAZAREK:</p> <p>22 Q. Is it -- Was it after -- sometime after 23 June of '04 and the -- Does it have anything to do with 24 the mailbox case?</p>
<p style="text-align: center;">Page 343</p> <p>1 Charles Lawrence. But when they showed me that picture, 2 I said, "No, this ain't Charles right there. That's not 3 the one."</p> <p>4 MR. TEPFER: Can we make a record of what --</p> <p>5 MR. BAZAREK: Yeah. Sure. Yeah. You're looking 6 at -- And we can just make it an -- We'll make it an 7 exhibit. I'll show everyone.</p> <p>8 MR. TEPFER: Thank you.</p> <p>9 MR. BAZAREK: Let's -- This is --</p> <p>10 THE REPORTER: 5.</p> <p>11 MR. BAZAREK: Let's make that 5.</p> <p>12 (Baker Deposition Exhibit No. 5 13 marked for identification.)</p> <p>14 MR. BAZAREK: Okay. I'm going to show you -- I'll 15 read it into the record. This is COPA Watts S016405.</p> <p>16 It looks like a booking photograph.</p> <p>17 BY MR. BAZAREK:</p> <p>18 Q. Okay. So I'm going to show you, sir, 19 Exhibit Number 5. Do you know that person?</p> <p>20 A. Yes.</p> <p>21 Q. And who is that person?</p> <p>22 A. That's Charles. I went to school with him.</p> <p>23 Q. Okay.</p> <p>24 A. I think I was a grade or so ahead of him. So</p>	<p style="text-align: center;">Page 345</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 A. Yes.</p> <p>4 Q. All right. So do you recall what year it was 5 where he shows up at your apartment?</p> <p>6 A. I'm guessing it was -- what? -- June of '04.</p> <p>7 I'm not sure. It might have been July. Yeah, it was, I 8 believe, July.</p> <p>9 Q. Okay.</p> <p>10 A. It was either the end of June or beginning of 11 July.</p> <p>12 Q. And you knew this individual to be an 13 informant of some sort for --</p> <p>14 A. Yeah. For Watts.</p> <p>15 Q. -- for Watts?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. Did you know where he -- this person 18 lived?</p> <p>19 A. He lived in 574 with his girlfriend Vicky. I 20 think that was her name. But he came to the building 21 early in the morning, knocked on the door. I'm like, 22 "Who is it?" It's Charles. I'm like, "What's up?" He 23 like, "Hey, Benny, man, Watts want to talk to you." I'm 24 like, "Give me his number." He said, "I can't give you</p>

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 346	Page 348
1 his number. We gotta go to the pay phone." So I say, 2 "Okay." I tell Clarissa I'm finna go with Charles to 3 call Watts. So we leave and go up on 47th between 4 Michigan and Wabash. There was a pay phone right there. 5 So he call the number. And into the --	1 and 23 seconds. We are now off the record. 2 (Deposition concluded at 6:53 p.m.)
6 Q. Charles --	6
7 A. Yes.	7
8 Q. -- calls the number?	8
9 A. Charles calls the number. And he says, "I got 10 little Benny right here." He said, "Don't call" -- 11 Well, I guess he said, "Don't call me on this number. 12 You have to call another number." So he hung up. Then 13 he called another number. And then he answered, and 14 they talking. I assumed it's Watts. They talking.	9 10 11 12 13 14
15 Q. Can you hear anything --	15
16 A. No, I can't hear.	16
17 Q. -- on the other end of the conversation?	17
18 A. No, I can't hear.	18
19 So they talking. And then he was like -- 20 Charles, like, got off the phone. He's like, "He 21 say" -- He holding the phone like this. "He say give 22 him a thousand dollars, and you will be okay." So I 23 said, "Uh-uh. Let me talk to him." So I get on the 24 phone. I say, "So if I give him this thousand dollars,	19 20 21 22 23 24
Page 347	
1 we cool?" He said, "I'm cool. But you want the truth, 2 or you want me to bullshit you?" I said, "I want the 3 truth." He said, "Well, you going to have to fight the 4 case, but you going to beat it." I said, "If I give you 5 a thousand dollars, it shouldn't be no case." He said, 6 "Well, you wanted the truth." I said, "Well, you can 7 pick Charles' ass up from here on Wabash." And I hung 8 up.	
9 Q. And as best you recall, that was a 10 conversation you had in July of 2004?	
11 A. Or the end of -- Just before he arrested me 12 for the mailbox case. So I believe it was June, but it 13 could have been the beginning of July.	
14 Q. Did you ever have any other interactions with 15 Charles after that day?	
16 A. No.	
17 MR. BAZAREK: Let's take a break for a moment.	
18 THE VIDEOGRAPHER: The time is 6:50 p.m. We are 19 now off the record.	
20 (A short break was had.)	
21 THE VIDEOGRAPHER: The time is 6:53. We are now 22 back on the record.	
23 This is the end of the deposition. The time 24 is 6:53. Our total run time is 6 hours, 56 minutes,	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 349

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

3

)

4

)

)

5

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

8

9

0 I, BEN BAKER, state that I have read the
1 foregoing transcript of the testimony given by me at my
2 video-recorded deposition on August 9, 2023, and that
3 said transcript constitutes a true and correct record of
4 the testimony given by me at the said deposition except
5 as I have so indicated on the errata sheets provided
6 herein.

7

8

- 9

BEN BAKER

20

21

22

23

NOTARY PUBLIC

4

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 350

1 UNITED STATES OF AMERICA)
2 NORTHERN DISTRICT OF ILLINOIS)
3 EASTERN DIVISION) SS.
4 STATE OF ILLINOIS)
5 COUNTY OF COOK)

4

5 I, Brianna Uhlman, Certified Shorthand
6 Reporter and Registered Professional Reporter, do hereby
7 certify that BEN BAKER was first duly sworn by me to
8 testify to the whole truth and that the above
9 video-recorded deposition was reported stenographically
10 by me and reduced to typewriting under my personal
11 direction.

12 I further certify that the said deposition was
13 taken at the time and place specified and that the
14 taking of said deposition commenced on August 9, 2023,
15 at 10:13 a.m.

16 I further certify that I am not a relative or
17 employee or attorney or counsel of any of the parties,
18 nor a relative or employee of such attorney or counsel,
19 nor financially interested directly or indirectly in
20 this action.

21 The signature of the witness, BEN BAKER, was
22 reserved by agreement of counsel.

23

24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 351

3

4

5

6

7

8

Brian Gable



BRIANNA UHLMAN, CSR, RPR
161 North Clark Street
Suite 3050
Chicago, Illinois 60601
Phone: 312.361.8851

CSR No. 084-004886

14

15

16

17

18

19

30

21

88

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 352

A	50:9 117:20 118:3,17 119:11 120:17 121:1 122:5,13 122:16,19 123:1,11,19 124:2 125:22 126:11,19 130:4,17 131:3 132:13 133:15 156:18 166:4 185:10 187:9 237:18 246:12 249:15,18 250:6,16 277:18 279:14 282:17 287:12 302:5 actual 11:11 33:7 91:11,16 190:20 209:16 239:16 295:6 ad-libbing 235:7 add 10:6 addict 54:7 adding 232:3 additional 57:15 address 16:5 20:17 39:21 40:1,4 42:21 47:5 48:11,15 56:5,9 57:1 68:12 115:21 116:22 253:11 253:13 ADE 13:5 Administrative 34:9 35:8 38:2 41:15 43:15 admissions 48:19 51:5 57:20 77:7,17 admit 76:15 adult 161:6 86:23 98:11 104:7,22 105:9 advice 96:11 105:17,18 106:16 108:10	advising 95:23 affect 9:12 181:1 affidavit 69:5,6 affiliated 218:12 218:13 afield 98:11 afoot 280:5 afro 291:12 afternoon 215:16 age 29:21 52:6 213:8 254:4,4 322:24 ages 254:5 ago 59:2 184:14 249:22 308:21 309:4,5,10 316:15,24 agree 10:13,16 10:24 102:3 104:20 108:20 112:9 113:24 118:15 130:3,6 138:1 173:22 229:2 257:5 259:1 276:20 Agreed 88:21 address 16:5 20:17 39:21 40:1,4 42:21 47:5 48:11,15 56:5,9 57:1 68:12 115:21 116:22 253:11 253:13 ADE 13:5 Administrative 34:9 35:8 38:2 41:15 43:15 admissions 48:19 51:5 57:20 77:7,17 admit 76:15 adult 161:6 86:23 98:11 104:7,22 105:9 advice 96:11 105:17,18 106:16 108:10	109:23 110:9 110:21 112:5 112:16 116:7 117:1 120:20 121:8 123:5,16 127:17 128:13 130:23 132:17 143:23 151:22 158:22 166:18 168:19 172:16 174:18 181:11 207:23,23 209:14 216:21 217:12 220:18 220:22 234:5 238:20 249:10 252:2 260:4 266:23 267:15 277:3 280:14 281:18,20 282:9 296:18 297:7 298:20 300:15 310:19 314:10 323:21 343:24 ain't 28:2 70:10 163:22 190:23 197:13 199:11 206:8 225:16 233:22 292:10 307:23 308:2 12:11 13:13 14:4 20:2 22:7 22:7 25:10 26:1 27:24 28:20 29:2 343:2 airfare 91:16 AJ 142:4,12,21 186:13 188:23 191:6,8 193:21 196:5,6,15,18 AMERICA 350:1 amount 66:11 66:17 71:16 75:22 220:13	229:18,20 234:14 241:18 256:7 261:16 262:14,18 265:1,5 266:11 266:18 267:19 268:11 269:7 274:12,20,24 275:3,6 283:19 283:20,22,23 284:19 285:4 286:1 291:24 300:8 328:22 330:4 335:6 AJ's 275:5 aka 19:13 183:9 albeit 299:16 alive 226:15 308:2 322:6 all-inclusive 91:18 98:4 allegations 105:8 Allen 2:7 alley 279:16 alligator 197:23 335:5 altercation 329:6 altercations 319:13 Alvin 3:6 143:6 146:13,15,17 146:18 147:3 147:16,17 148:13,18 airfare 91:16 AJ 142:4,12,21 186:13 188:23 191:6,8 193:21 196:5,6,15,18 AMERICA 350:1 amount 66:11 66:17 71:16 75:22 220:13
----------	--	--	--	---

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 353

288:12	249:10 250:9	24:22 30:21,23	approached	186:7 191:14
Andre 2:8	299:9 305:21	31:2,17 32:4,7	52:16,18 53:7	198:7 200:21
Angelo 2:17,17	312:11	32:14,18,22	53:8 55:24	229:2,10 237:2
announced	answered 11:23	34:24 35:3,5	65:17	238:2 239:10
128:1 163:7	15:5 16:2 28:7	36:9,21 43:6	approaches	239:23 290:12
166:11	28:11,19 34:20	43:10,19,24	227:7	295:6 298:6
ANOV 192:1	48:17 50:3	44:18 45:15,18	approaching	302:13 314:16
ANOVs 191:23	72:11 102:17	45:20 46:9	228:4	326:2 333:4
answer 9:24	104:5 105:15	50:8,15,18	approximate	arrested 9:7
10:5,7,12,17	108:2 109:17	58:15,20 69:12	78:10,17	46:18,22,23,24
10:19 11:1,3,4	111:17 112:1	86:3 115:6,10	approximately	47:2,13 59:13
11:17 17:4,5	113:2,6 121:7	136:2 139:4	78:14 108:19	73:19 90:19
19:22 36:14	123:21 124:3	151:6,8,12	114:1,10,18	129:3 142:9
38:24 40:21	130:19 139:21	152:1,1,2,5,20	April 23:20 43:2	154:13,15,16
43:13,15 46:15	143:14 144:4,9	162:17 167:8	46:22 100:15	155:13,14,15
52:14 60:9,9	144:16 152:14	180:12 186:17	102:9	180:4 194:10
61:16 65:1	159:4 189:16	187:16 189:22	area 19:1 53:1	204:3 208:15
77:7 81:19	210:17 220:10	190:11,16,19	73:18 243:8	208:18 212:6
82:1 84:15	220:21 305:23	191:9 192:14	254:16,19	215:15 218:20
95:19,23 96:1	323:20 346:13	192:18 193:12	284:21	218:22,24
96:3,4,5,7,11	answering	193:20 194:8	areas 243:10	230:18 239:14
96:20 99:5	142:20	194:13 195:18	arguing 329:13	240:11 262:20
102:19 103:22	answers 10:15	196:4 204:9	329:14,16	264:12 285:16
105:13,17	11:21 12:1	241:2 248:8,12	330:10	285:19 287:3
107:10,17	30:1 38:18	252:15 253:8	argumentative	287:15 293:13
108:6,7,14,15	62:7 99:14	266:10 268:10	12:3 14:3,15	295:20 301:8
108:21 109:3	101:2,12	305:9 326:21	14:22 15:11,20	313:7,14
109:14 110:21	106:19 120:2	331:2 341:22	28:18 38:1	318:14,18
111:14 112:15	123:3 137:14	344:14 345:5	49:8 64:11	331:9,18 333:4
113:5,13,23	140:9,19	apartments	104:6 110:8	347:11
114:8,19	144:12 307:10	21:24 85:23	111:16 113:14	arresting 296:10
116:16,20	311:16	86:10 115:4,5	120:9 122:7	arrests 141:10
117:5,9,11	Anthony 2:7	153:6	123:3,12,22	142:9
118:6,8,10,12	Antonio 94:14	apologize 128:2	143:11,21	arrive 285:8
118:16,20,22	anybody 93:4	appearance	181:10 216:20	289:1,2
118:23 119:3,5	165:4 270:15	200:8 259:17	280:10	arrived 69:12
119:6,13,17,17	Anytime 10:4,9	APPEARAN...	arm 274:2	172:3 229:3
119:22 120:23	anyway 116:12	2:1 3:1	Armour 131:19	283:6,18
124:2 125:5,20	238:24 265:4	appearing 7:6	131:20	284:13 291:4
126:2 132:21	289:24 290:1,4	7:11,14,16	armrests 274:1	Asian 202:23
137:2 138:1	292:12	apple 142:16	arrest 48:23	203:1
148:5,7 152:12	apart 39:1	applying 103:3	146:9,24	asked 11:2,21
166:18 173:14	141:10	103:17	154:15,17	15:5 16:2
210:12 218:13	apartment 16:7	apprehended	155:17 156:13	18:20 28:7,11
238:19,21	17:8 20:20	180:6	171:23 173:17	28:19 52:17

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 354

53:22 54:15,17	274:22 334:1,3	audiotapes	baby 339:10	261:19,19,20
59:8 62:13	347:7	129:18	back 16:17,22	262:17,20
65:12,17 66:19	assert 95:18	August 1:18	24:16 25:4	264:11 265:14
67:4 72:11	assigned 156:7	6:11 9:5 42:23	27:15 30:7	268:7,10,12,12
80:20 102:3	278:19 331:16	43:3 106:1	31:3 32:12,13	270:1,2,2,15
104:5 105:14	331:23 332:1	107:3 108:3	32:19 33:6,8	271:1,2 273:4
107:10,15	332:16	349:12 350:14	33:16 41:4	274:18,19,20
111:16 112:1	assist 311:1	351:2	42:17 65:8,23	275:13 276:5
113:2,6 117:17	associate 89:3	auntie 160:22	68:10 70:6	278:13 283:1,5
121:7 123:21	associated 105:7	auntie's 195:10	72:14 73:2,8	284:11 285:15
124:3 125:17	association 8:2	244:12 253:2	73:10 75:23	288:18,19
130:19 137:16	142:14	301:9	79:16 82:8,12	289:12,14
139:21 143:14	assumed 110:12	authorities	82:18,21 89:11	296:22 297:19
144:4,9,16	117:10,15	59:13 90:19	89:12,15 97:4	302:1 304:24
148:15 159:4	325:18 342:24	129:2	99:14 108:2	305:2,3 306:18
171:7 183:8	346:14	Avenue 2:12	109:16 111:6	315:13 320:16
189:16 214:2	Atanise 88:12	aware 159:12	127:16,24	321:10 324:21
220:10,21	ate 177:13	167:15,17	128:4,22	325:8,9,13,23
248:19 280:12	attached 106:18	231:8	131:11 132:10	329:9,12,13
289:15 292:6	140:18 303:9	B	138:12,21	330:19 332:4,9
305:20,23	attempt 303:3,5	B 5:11 19:7	139:10,17,24	332:10 333:3
307:21 308:6	303:13,15,23	51:12 62:17	140:8 149:6	333:20,21
323:20 333:8	304:9	114:21 124:23	163:8 164:4	334:6,8 347:22
asking 8:17 27:3	attempted	125:19 150:15	167:23 168:3,4	backed 228:15
27:20 42:3	116:14 157:8	150:21,23	168:5,20,23	badge 327:19
55:8 69:22	157:15 158:15	151:12 153:17	169:6 171:18	badges 329:21
77:6,13,15	attempting	158:20 159:3	172:6 173:8,19	badly 320:13
78:14 93:13	305:18	174:11,13,14	174:11,13,14	bag 38:15 55:14
100:7 104:21	attend 49:14	167:16 173:9	175:15 176:11	55:18 135:19
114:11 115:19	attending 16:21	174:8 175:12	176:17 177:1,2	223:10,11
115:24 116:1	49:20	202:10 205:11	177:12 178:6	224:16 227:20
116:12 120:13	attention 175:3	210:19,23	178:10,13	288:5,7 310:3
123:18 124:21	attorney 36:24	211:4,21 217:6	179:20,21,23	310:4,6 338:15
142:9,19	48:1,3 64:24	218:8 249:15	180:1 186:4	340:22 341:4
146:16 171:1,6	77:14 95:8	249:18 250:17	197:10 198:15	baggies 309:19
172:12 210:16	96:4 119:6,16	282:4,6,17,21	205:11 208:22	bags 55:14
210:18 242:7	129:14,16	306:12,14	218:4 228:23	133:16,19
255:2 268:19	350:17,18	307:3 309:2,7	228:24 231:1,5	134:13,21
284:5 307:4,5	attorney's 96:11	310:11 311:2	231:15 233:23	136:2,7 223:9
309:22 342:1	119:2	311:14 312:5	244:8,11	223:10,11
asks 71:13	attorney-client	315:5,22 316:2	247:23 251:3	227:10 288:4,6
102:12 112:22	61:15 118:7	316:16,19	251:18,21	288:14
116:6 117:22	attorneys' 10:16	321:20 322:17	252:9,14	Bahamas 91:23
ass 231:18	ATV'ing 97:19	B-A-K-E-R 8:13	255:15 256:7	92:1
270:16 271:3	audio 60:5,13,19	B-E-N 8:13	259:15 261:16	Baker 1:10 2:6

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 355

2:15 5:4,13 6:7	24:16,17,18,19	Bazarek 3:3 5:5	183:17,19,21	16:22 20:13
6:15,22 8:6,11	25:1,2,8 27:20	7:1,1 8:10,15	185:21,23	24:18 33:3
8:13,14 10:4	30:8,13,24	10:21 14:23	186:5 199:15	35:14,17,19
11:6 13:3	31:3,15 32:10	15:16 16:14,18	202:3 215:5	38:4 39:9
16:11,11,11	32:11,13,18	20:3 23:3	220:11,18	42:23 43:1
18:23,24 19:2	33:5 34:2,8,11	26:15 27:2	226:10 235:13	44:4,13 45:22
19:9,13 20:12	34:12,21,23	31:6 34:10	243:1 251:6	47:20 49:23
20:14 21:11	35:3 36:8,11	40:9,11 42:11	257:21 268:2,8	52:20 53:15
27:4 34:8,17	37:5,9,20,22	42:18 44:1	272:7 280:13	57:12 66:6
42:19 61:5	38:5 42:2,3,4	48:13 50:23	281:19 284:7	71:15 76:11,13
64:21,23 65:6	43:18,23 44:12	61:4,20 64:9	306:1 307:6	81:21 82:10,14
78:15 79:12,18	44:13,15,19,20	64:12,19 65:3	311:12 314:9	83:11 87:2,2
95:22 96:3	44:22 45:6,20	65:9 68:23	321:15 331:8	90:17 91:9
98:16 100:9	46:3,9,12	69:2 77:15,20	339:16 343:5,9	92:18 93:21
103:2,11,16,19	50:10,20 51:1	79:7,17 89:19	343:11,14,17	94:19 128:15
106:5,17	58:21 59:9,11	92:9 95:19,21	344:21 347:17	130:13,15
108:18,20	59:12,14,16,17	96:2 98:1,12	be- 326:9	135:5,8 138:20
114:8 121:16	59:18,20,23	98:23 99:2,4	Bear 252:10	139:24 146:10
124:17 127:19	60:1 62:3	102:1 103:8,14	Bears 239:15	146:22,23
132:12 140:17	66:19 69:10	104:23 105:10	244:7 253:6	155:24 158:13
141:1 170:4	70:14 74:1,14	106:4 109:15	beat 329:18	160:5,21
171:19,22	75:3,10,24	111:7 112:3,4	347:4	167:21 176:5
172:1,4,7,23	76:4,7,16,21	113:3,17 114:7	beating 180:2	178:20 184:13
173:5 182:11	77:2 113:5,11	114:13 115:15	Bebe 212:21	186:13 192:20
182:13,17	122:13 130:7,7	115:17 116:4,8	213:1,3,6,8,11	194:9,20,22
183:3,3,4,5,9	130:9 138:4,10	116:11 118:14	213:12,22	197:4 199:3,22
183:11,18,20	138:14 139:9	119:1 120:10	222:19,21,22	203:4,4,5
183:24 184:1	139:13 183:3,9	120:21 123:4	223:3,4 224:14	205:4,4 212:2
186:6 200:19	183:10	123:15 124:11	224:19 225:10	212:3 213:4,21
226:6 239:9	ball 308:10	124:14,16	225:12,15	215:18,18
242:19 268:9	ballpark 183:9	125:2 127:10	227:17 236:22	216:7,10 220:6
300:20 321:18	254:5,7	127:18 128:3,6	237:21 238:17	220:9 224:18
343:12 349:10	balls 308:8,14	131:1 132:2,4	238:24	226:19 234:15
349:19 350:7	309:9,12,14,18	132:11 135:3	beginning 29:21	237:4,5 238:23
350:21	bar 195:10,12	135:23 143:22	42:20 181:1	245:9,14 248:3
Baker's 106:8	282:12,13	144:5 145:16	201:16 253:5	253:14 255:20
140:18	BARONI 3:13	155:8 158:23	307:11 345:10	282:9 286:22
bald 267:10	based 109:3	168:10,18	347:13	290:22 291:6
baldhead	basically 150:19	169:15,17,20	behalf 2:6,15,23	291:14 299:1
261:11	205:17,17	169:24 170:2,3	3:6,12,17,22	301:18 302:17
Bali 18:22 19:10	230:9 275:20	170:9,12 171:3	6:18 7:5	304:19 305:13
19:11,13 22:9	basis 68:4 125:8	171:5,8,10,12	117:21	305:16 306:20
22:9,11,11,13	Bates 171:13	171:16 172:17	behold 164:13	306:21 307:12
22:17,19 23:5	bathroom	172:20,22	belief 299:2	312:16,20
23:6,7,8,10,11	176:13	173:1,4 179:7	believe 9:6	314:6,11 316:4

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 356

316:21 319:6	Bill 128:2	118:16 189:20	333:18 334:9	brown 51:9,10
320:4,11	220:15	197:15,18,18	brakes 279:17	51:15 52:5,11
324:10 325:3	biological 178:5	197:22 198:13	bravado 210:1	53:17,21 54:2
326:3 328:20	Bird 323:2,3	199:24 200:4	break 10:9	55:3,7,20,24
329:7 331:6	birthday 215:8	204:13 232:24	40:10 42:11,15	56:22 57:6,11
345:8 347:12	215:10,12	233:1,4,5	79:7,11 110:24	57:16 58:8,11
bell 3:8 284:8	219:14 326:12	291:6,20	111:4 123:13	58:24 62:3
Ben 1:10 2:6,15	bit 7:23 71:7	292:17 335:4	124:9 127:10	74:2,14 78:3
5:4 6:7,15,22	black 255:21	335:12,16	127:14 132:8	79:2 83:10
8:6,13 16:11	256:6 258:15	336:1,5 337:13	178:7 185:20	84:7 117:14
22:5 42:12	259:2,16,18	Bolton's 98:18	185:21,23	122:16 130:11
65:6 98:16	261:12,14,23	100:10 101:12	186:2 251:1	138:4,11
100:9 106:8,17	264:22 283:15	bond 200:10	267:24 268:5	Brown's 52:3
140:17,18	291:17,18	211:12 236:20	315:7,8,14	Browning
152:15,16	337:14	237:8,14,16	324:20 347:17	116:22 117:12
178:3 270:16	Blair 2:15	239:9 246:6,12	347:20	171:19 172:3
285:24 333:23	Blazers 244:22	303:8,12	breakfast 216:1	201:9 228:17
349:10,19	blew 255:13	bonded 201:1	333:19	262:10 334:7
350:7,21	block 21:5 56:10	237:4,12,13,20	Brian 3:8 7:13	brownish
bench 238:8	56:12 248:24	239:20,22	98:17 99:8,8	244:24
287:7,10	blocking 243:10	240:15 241:6	Brianna 1:15	Bruce 2:17
bend 321:2	243:23	241:21 243:16	8:2 350:5	Brush 21:23
bending 321:2	blocks 179:2	303:2	351:9	Bryant 143:7
Bennett 339:21	blow 223:13	bone 317:19	bribe 141:2,5,8	145:18 146:7
339:21 340:6	blue 160:6,7,9	booking 343:16	bring 30:23 33:9	146:20 147:23
Benny 285:23	160:12,15	boom 326:24	41:22 42:5	149:7,8,12,18
345:23 346:10	169:7 269:3,10	327:1,1,1,1,4,4	57:3 81:17	149:21,23
Bernard 322:3,4	273:9 285:10	327:4,4,5	85:14 86:1	150:1,4,13,16
322:10 323:1,6	blue-and-white	Boost 128:24	87:14 93:5	153:19 181:7
324:18,23	255:20,23	boot 320:17	117:14 247:15	205:8 208:2
325:5,8	256:3 259:2,13	born 51:23	247:16 248:1	323:11,15
best 9:19 17:22	259:15,17	Bosak 3:23	broad 125:9	bugged 60:24
22:13 27:16	260:17,23	bother 332:17	broke 330:19	61:7
28:5 30:14	262:10,13	bottom 164:18	342:4	building 56:22
51:22,24 98:8	265:11 266:14	222:17 225:2	broken 164:20	89:9 125:19
100:12 101:17	274:24 275:2	bought 75:7	brother 25:2	126:24 129:5
106:20,22	283:8 284:2	80:10	244:11 344:2	147:9 149:14
107:1 140:20	288:20 335:6,7	Boulevard 3:3	brothers 264:8	149:17,19
347:9	337:17	Bowl 135:13	brought 30:20	150:12 151:20
better 49:10	blunt 176:13	Boy 318:21,24	31:2 44:18	162:18 165:13
94:1 195:3	board 218:16	319:2,4	45:5 85:13	167:23 168:3,4
295:8,12	336:6 337:22	boyfriend 63:2	175:2 236:12	168:6,20,24
big 66:16 81:6,7	338:4	338:16	290:20 294:1	169:6 172:8
89:6 257:14	boat 92:23	boys 32:2 248:9	332:3,8,10	173:19 175:15
335:19	Bolton 99:6,7,8	254:3 326:23	337:5 340:22	175:17 176:18

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 357

176:19 177:2,2	331:10 333:5	40:7 50:10	174:17 217:11	261:23 262:1,4
178:13 179:23	bulls 194:15	54:10,13 56:1	229:5 234:4	262:13,17,22
180:1,2,9	bullshit 197:8	57:18,22 63:1	250:8 252:22	263:12,14,18
187:18 198:4	197:13 199:4	64:1,7 68:9	252:23 296:14	263:19,22
201:10 205:7,9	203:8,15	71:4 72:3	296:17,23	264:1,4 265:9
205:19 206:2	228:22 261:17	85:24 86:13	297:5,14	265:11,13,15
216:6,9,17,18	332:24 347:2	87:13 89:5	298:18 300:14	265:17,20
217:2,4,6,15	bundle 223:4,6	122:20 152:7,9	346:8,9	267:9,16,21,22
217:18 222:15	223:7,14	154:22 161:23	Campbell	268:15 269:24
225:19 241:1	287:20 288:3	162:9 167:13	341:10	270:1,3 272:24
241:24 247:17	bundles 287:21	172:2 197:23	cane 194:17	273:2,4,5,6
249:4,21	287:23	207:6 208:14	321:8	273:11,13,15
254:24 255:12	bureau 145:8	223:12,17	cannabis 38:20	274:12,16,17
256:9 260:16	burgundy	228:16 236:18	39:1	274:21,21
266:7,17,22	245:24	238:17 252:21	Caprice 245:14	275:5 283:21
267:5 270:15	burner 127:19	253:1 261:21	caption 98:19	283:24 284:1
275:11 276:3,8	127:20	279:16 290:21	car 44:4 56:23	285:6 287:20
276:9,11,17,21	Burns 3:18 6:24	310:22 327:3	73:5 80:4,16	289:3,4 296:20
277:13,18	7:7	346:3,5,10,11	80:18,21,22	297:12,18
278:6,15,19	business 137:1	346:12	81:1 82:15	298:3 328:16
279:22 283:3	310:17	called 1:11 8:7	83:7,11 157:19	328:17,20,22
284:21 285:2	busy 247:19	25:13,15,20,22	160:4,14	329:9,10
285:19 286:14	buy 21:17,22	32:11 44:13	162:12 172:8	330:23 334:13
286:19,24	24:17 43:21	67:4 69:13	176:19,23	337:17 340:21
287:2,12,18	59:8 60:4 75:6	71:6,6 130:10	196:16,17,22	340:23 341:2
289:9 293:14	145:6 152:4	130:13,15	197:2 198:13	card 328:8,10
305:7 307:14	215:11 219:17	162:4 173:24	213:15 227:6	cards 221:10,13
307:18,20	219:21 277:13	185:2 187:20	228:10,10,18	care 195:2 277:8
317:12 332:16	buyer 87:8	206:3 207:6	229:1,8,15,16	cared 137:9
333:21 334:10	<hr/>	223:18 244:13	229:19,20	carefully 61:14
337:8 338:10	C	275:3 285:23	230:14 231:5	carried 156:23
338:13 341:16	Cadillac 80:3,8	290:22 313:20	157:1	157:1
344:12 345:20	80:14 83:3	329:12 332:9	carrier 128:22	carrier 128:22
buildings	84:7,9,13,21	339:2 346:13	cars 196:3	cars 196:3
141:15 151:7,8	Cadman 3:17	calling 122:3	262:19,21	262:19,21
151:10 276:5	7:17 198:1	185:11 207:19	Carter 2:15	Carter 2:15
bull 157:9	291:13 336:1	225:5	Cartwright	Cartwright
194:14,19	337:13	calls 25:12 43:13	73:21,22	73:21,22
199:10 233:11	Cal 49:22	46:13 47:9	case 6:9 9:6	case 6:9 9:6
256:16	California	61:2,8 71:13	47:15 49:2,16	47:15 49:2,16
bullet 317:2	236:17,21	74:19 81:23	110:12 111:10	110:12 111:10
328:5 332:8	call 18:5 22:10	84:14 92:8	111:11 113:9	111:11 113:9
bullets 327:18	24:19,20 25:6	93:14 105:5	113:22 117:7	113:22 117:7
327:19 328:4	25:7,14,16,18	132:15 135:2	117:11,16	117:11,16
328:13,14	29:16 30:7,12	169:1 173:11	125:10 153:23	125:10 153:23

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 358

153:24 154:9	change 245:15	56:12 95:6	160:3,17	289:4,16,18
154:10 158:8	342:3	189:5,7 216:12	161:17 162:11	290:1,5,20
164:15 179:12	changed 198:9	301:11 313:9	163:11,14,15	291:9 292:6
187:7 198:22	342:4	351:10	167:15 168:2,4	295:12,14,17
201:5 203:8,22	characterizati...	children 13:23	168:5,14,21,23	296:12,21
204:20 205:10	15:4 19:16	115:7 171:20	169:5 170:8,8	297:21,22
208:22 209:5	22:1 34:8,16	171:21 172:4,6	171:7 173:8,12	298:22 299:2
212:7,15,18	36:13 108:8	172:8 299:18	173:16,22	299:13,23
214:15 240:12	116:23 128:11	Christopher 2:8	174:6,10,13,14	300:4 304:4
246:6 290:17	311:10	circles 62:24	175:5,8 176:10	306:18 313:20
300:6 301:24	characterizing	63:14	176:14,20,24	320:22 326:22
302:11,17,19	110:19	circumstance	177:3,6 178:12	333:18,19
303:1,2,3,12	charge 303:3	318:14	186:18 187:23	334:9,11
303:21,23	charged 157:6	circumstances	188:16 189:24	341:21 346:2
304:9 331:17	157:15 164:13	48:23 145:22	192:13 193:7	Clarissa's 80:16
332:2,2,3,4,5,7	166:6 191:15	302:13 312:22	200:17 215:22	91:13 178:2
332:9,14	299:1 331:10	326:20	215:23 216:16	244:18 247:2
342:18 344:24	charges 304:13	citation 191:19	228:11 231:1,4	254:14 295:7
347:4,5,12	Charlene	city 3:22 7:5	231:6,7,12,17	297:18 304:23
cases 7:18	341:10	11:12 62:23	231:20 233:20	327:19
catch 165:14	Charles 342:8	81:17 216:12	237:9 239:13	Clark 351:9
caught 154:18	342:10,12,16	296:3	244:8 245:2	classify 104:18
155:9,12	342:16,22,23	Civil 1:12	247:19 248:1	clean 280:9
169:10 303:1,5	343:1,2,22	CK 211:10,13	248:11 251:14	282:21
303:6 332:2,7	344:6 345:22	240:4	252:5,21 253:1	cleaning 21:18
cause 320:12,16	346:2,6,9,20	claim 14:18	253:8,10,12,24	cleanup 278:15
cell 65:2 67:6	347:15	103:19 145:9	254:10 255:5,9	278:16,17,21
cent 76:5	Charles' 347:7	claiming 141:11	255:10,15,16	279:19,21
Cermak 176:5	check 163:8,10	146:1,3	256:6 261:16	280:5,6,15,17
certain 156:15	163:12 171:24	claims 142:8	262:17,23	280:21,22,22
227:23 291:7	checked 308:7	clarification	263:16,22	281:14,15
291:19 310:23	Chevrolet 160:6	171:4	264:7 265:5,12	282:4,6,11,12
certainly 221:16	160:7	clarify 10:5,6	265:20 266:2	282:14,16,18
246:11	Chevy 160:10	125:5	266:20 267:10	282:19,19
Certified 1:15	160:12,15	Clarissa 13:22	267:15,16,18	clear 40:6 42:19
350:5 351:1	245:7,9,11,13	16:9 24:3,12	268:9,24	cleared 244:9
certify 100:9,11	247:4 264:17	24:14 31:24	269:18 270:16	clearing 264:8
106:19 140:19	Chewbacca	35:13,14,20	272:14 273:8	clearly 138:5
350:7,12,16	338:22,23	48:3 80:15	274:24 275:3,4	clever 206:12
chairman	339:6	83:14 88:11	275:5,6,6,7,12	Click 275:22,23
218:15	Chicago 1:17	94:2,5 95:13	275:16 283:19	clients 141:17
champagne	2:4,13,21 3:4	97:2,6,15	283:21,22,23	141:18 186:23
246:3	3:10,15,20,22	98:17 115:7	283:23,24	Cline 3:23
chance 109:11	6:5 7:12,14	142:23 152:12	284:16 285:5	close 88:20 89:2
175:14	11:12 38:15	152:14,23	287:7 288:1,24	89:21 196:24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 359

closer 273:5	318:24 319:2,4	282:19,20	193:1	conversations
closest 28:10	color 85:2 160:8	317:10,12	confidante	209:16 240:8
226:1 273:3	227:23 244:23	319:20 332:18	28:14	convicted 157:8
clothed 290:5	244:24 245:11	332:20,24	confused 183:17	300:21 303:15
clothes 290:2	245:19,23	334:8,9,10	confusing	306:19
coaching 109:9	246:2 274:13	commenced	125:16	conviction
cocaine 39:3	colors 245:15,16	350:14	connecting	301:19,22
84:20 93:10	come 21:17,20	commencing	330:16	302:2,7,8,16
108:18 113:24	24:17 28:3	1:17	consented 328:1	312:15,19,19
114:9 126:8,11	32:12 33:6,8	communicates	consider 54:4	312:23 315:4
127:2 181:22	33:16 35:3	64:23	104:16,17	315:16 325:21
182:3 183:12	36:9 40:16	communication	105:20 122:24	326:1
184:2,5,7,12	42:12 45:20	59:15,19,21	240:20 241:9	Cook 116:14
184:16 207:1,6	58:8 62:18	communicatio...	considered	350:3
207:14,16,19	86:2 87:7	61:16	37:20 240:24	cooked 326:23
207:21 208:3	138:21 139:1	community	244:21	cool 347:1,1
213:4,6 216:9	147:9 152:7	159:18,19,21	console 273:23	coordinated 1:5
216:11,18	156:1 166:8	160:1,3 161:3	273:24 274:4	6:8,23 7:3,18
224:18 226:3	178:6,13	174:1,7 175:13	constant 184:17	64:2 214:12
226:20 227:2,8	205:19 225:4,6	303:9	constitutes	349:5
227:9,24 228:2	225:8 228:19	compartment	349:13	COPA 167:20
228:4 276:16	233:20,23,24	274:5	consult 65:7	168:13,23
301:5,6 308:10	241:1 243:11	comped 95:16	contact 20:12	169:4,12
308:14,17,23	244:14 253:2	competition	23:5 59:22	170:18 171:2,7
309:1,9,12	255:4 256:3,6	276:24 277:5,7	62:18 65:1	171:13 172:12
310:8,9,10,22	257:17 260:8	complain	67:13,18	175:2,4,8
311:2,8,13,13	260:17 262:20	219:20	184:20 222:7	343:15
311:21,24	266:11,18	complaint 68:17	335:3	copies 342:5
312:4,8 313:2	268:11 274:18	68:22,23	continue 323:15	Corey 247:6
313:3,24 314:2	274:19 277:12	completed 234:3	continued 3:1	corner 38:14
323:12 325:14	295:7 307:19	303:8	200:15 315:4	correct 8:23
325:15	317:12 327:14	complex 309:7	Continuing 50:2	11:7,14,15
cocktail 17:9,15	328:16 329:12	Complying	contrary 109:12	13:19,23 14:11
31:19 69:16	329:23 331:16	226:8	controlled 39:3	29:21 36:4
86:8	333:1,18,22	concerning	107:21 182:5	46:3 58:16
cocktails 98:6	comes 37:11	138:3	conversation	72:2,9 74:11
code 153:10,11	coming 22:22	concluded 348:2	24:24 25:8	74:12 76:16
codes 153:5,7,8	158:12 222:9	conclusion	27:16,17 53:20	79:6 86:6,7
coffee 248:18,20	222:10,13,14	229:6 298:19	105:9 201:7	87:9 90:20,21
248:22 249:24	222:16,22	concrete 334:7	209:4 211:9,11	96:11,12
251:7,15,21	224:23 225:7	concurrent	211:15,18	100:12 102:15
252:7,20 255:3	255:19 258:2	304:9	214:8 229:24	102:22 106:10
coke 307:23,23	258:24 260:1	conditions	240:3,4,5	106:20 112:20
collected 14:18	278:20 279:22	237:14	280:22 346:17	114:2 116:22
College 318:21	279:24 280:18	conducted 58:12	347:10	121:17 126:3

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 360

135:7 137:19	170:14 186:13	crutches 321:7,8 321:9	100:15 170:2 Dave 237:11	229:14 230:5 230:22 244:6
138:4,8 140:20	188:23 198:1	CSR 351:9,13	David 18:23,24	244:18 245:5
142:23 145:4	203:11	cuffs 190:23	19:2,9,13	246:18 247:2
146:21 148:24	course 189:23	191:1,3,5,6,8	20:12,14 21:11	249:5 251:16
155:18 156:22	court 1:1 6:10	191:12 227:6	183:3,3,4,5,9	252:23,23
165:20,22,24	7:24 9:7 49:14	228:9 271:3,4	183:11,18,20	261:2 262:22
166:13,16	77:21 148:3	272:12 274:22	day 21:12 22:19	264:12,15
170:2,9 171:8	158:12 200:7	275:2,3,6,6,7	29:11 31:21	284:20 288:8
187:13 189:15	236:20 237:1	curb 258:17	32:14 42:22	292:3,14
190:14 193:1	238:14 298:5	curfew 156:12	45:10,13,15	307:20 319:5,8
197:3 204:11	331:11,15,16	currency 121:22	46:23 47:1	331:2 333:13
204:23 208:19	332:12,18,18	122:1,4	52:16 53:8	333:14,16,20
211:7,21,22	332:20,24	current 11:13	54:23 56:2,4	334:1,17,20,22
221:20,21	333:1 349:1	currently 20:14	61:24 86:17	335:2 337:3
229:4 230:2	courthouse	cursing 199:10	87:4,9 89:11	344:20 347:15
238:2,4 240:10	49:21	Curtis 2:15	89:12,15 93:20	349:21
246:16 255:6,7	Courts 1:13	custody 137:18	93:21 102:7	days 23:2 33:7
257:20 259:19	cousin 182:9	200:20 237:3	135:16 138:12	87:6 93:22
263:22,23	183:4 244:12	customer 22:13	138:16,24	180:7 182:17
271:19 282:17	301:9,10	86:16,22	139:16,19,24	331:22
284:22 287:5	324:24 339:10	cut 41:1,2,7,12	140:1,3 146:14	DEA 69:6 129:3
291:21 298:6	339:11	41:19	146:16 147:2,4	dead 201:19
298:10 302:5,9	cousin's 182:10	cuts 41:17	147:6,7,19,21	226:15 308:3
316:20 321:21	338:16	covert 262:6	148:10,13,18	339:15 341:7,9
321:22 337:3	CPR 205:22,24	CV 1:5 6:9	159:8,10,16,21	deaf 195:1
349:13	206:4,7,9,13	349:5	159:24 160:18	deal 31:4,7
Corrections	206:22 207:24	<hr/>	160:20 161:15	158:2
137:19	crack 301:5,6	D	161:23 163:2,9	dealer 14:1,20
correctly 70:9	313:3 323:12	D 5:1	163:19 165:24	15:2,8,14,18
125:24 172:16	325:14,15,17	dad 178:2	169:6 170:22	25:23 104:12
288:5	creative 206:21	327:23	175:7 176:19	114:17 121:17
corso 194:17	crib 187:21	dad's 327:19	177:18 179:16	121:21 122:3
cosigning 198:8	criminal 47:15	DAFFADA 3:13	179:19 184:21	143:8 158:20
cost 31:9 211:12	49:14 68:17,22	daily 150:9,10	186:7,10,20	182:19 202:13
Cottage 196:24	68:23 156:17	Damn 225:7	188:1,3,5,6	250:12 282:7
couch 193:8	237:18 300:13	Danny 338:19	192:17 195:15	dealers 41:11,14
could've 65:19	cross 259:9	338:20 339:5	200:19 203:2	219:1
counsel 5:20	cruise 88:5,9,10	dark 246:3	204:3 205:17	dealing 41:4
125:15 298:15	88:23 90:3,7	date 6:11 11:8	205:18 208:10	110:15 120:7
350:17,18,22	90:10,14,15,18	11:11 18:14	209:8 215:20	281:5
count 34:18	91:8,15,16	124:21 125:20	215:22 216:1	deals 113:4,11
County 116:14	92:2,13,17	146:22 212:19	218:4 219:22	Debra 3:23
331:13,13	93:4,8,9 96:15	239:16 344:18	222:5,24 223:2	decade 324:3,5
350:3	97:1 135:11	dated 27:9	224:7 226:21	deceased 201:21

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 361

December	178:2 dep 22:10 183:2 Department 137:18 161:6 depend 22:23 241:14 depending 12:16,17 224:7 deposed 9:17 deposition 1:10 5:13 6:3,5,7,16 8:20 9:13,16 10:24 30:11 46:2 76:3 78:23 79:12 87:4 96:1 99:18 116:10 125:6 129:19 137:13 143:5 148:12,23 163:23 172:23 189:10,13 204:7 263:21 321:11 326:5 336:4 343:12 347:23 348:2 349:12,14 350:9,12,14 depositions 1:14 describe 107:20 145:22 190:18 321:4 described 46:2 86:9 117:18 202:24 describing 337:19 desk 199:7 233:24 Destroy 297:11 destroyed 296:1 296:2,20 297:20,21 detain 242:4,7	directly 37:23 65:2 119:10 120:16 121:22 124:22 125:21 165:1,3 350:19 dirty 142:16 disappointed 49:12 disbanded 218:11 disc 129:20 Disciple 19:2,6 29:18,19,20,24 149:8 213:22 214:3,5 306:2 306:13 322:21 Disciples 30:4 158:5 215:1 218:9,10,11,13 218:19 219:7 219:10 306:10 Disciples' 306:4 discuss 226:17 discussed 201:4 discussion 205:2 205:14 discussions 75:1 dismissed 201:5 205:10 208:22 209:5 332:14 dismissing 333:2 dispute 165:21 disputing 165:15,18 distance 39:10 39:13 differently 120:5 dilute 40:17,24 dime 77:9 96:14 dinner 97:20,22 326:23 direction 272:21 350:11	349:1,1 350:1 Division 1:2 6:11 349:2 350:2 divorce 24:7 divorced 24:3,5 document 109:4 documents 109:10,10 Dodge 160:5 dog 194:9,11 195:8,9,9,12 195:15 337:5 dogs 194:5,6,7 194:11,12 doing 37:15,16 73:6 110:15 113:11 120:5 135:20 136:2 142:17,18 160:22 175:24 195:11 197:11 199:5 205:23 205:23 208:17 224:7 235:5 265:7 277:9 292:21 294:17 310:1 dollars 76:15 221:2 346:22 346:24 347:5 dolph- 97:20 Dominican 97:4 97:9,18 Donuts 248:18 248:23 251:7 Doolittle 344:2 door 18:20 22:20,21 23:12 32:21,21,22 58:22 152:11 152:13,14,15 162:7,14,20,22 162:24 167:8 180:2 186:11
-----------------	--	---	--

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 362

186:12 188:15	downtown 7:12	25:23 31:7	122:2,3 123:17	183:2 204:6
188:16,19	36:3 53:5	41:11,13 54:6	126:6 133:2	326:5
190:1 228:19	drank 252:20	104:12 110:15	138:11,13	early 36:1 209:9
228:21,24	drawn 225:3	113:4,11	139:9,13	248:13 251:14
265:1,2,3,5	drink 251:15	114:17 121:16	141:16 142:11	342:19 345:21
266:21 271:2,9	drinking 192:4	121:21 122:3	143:9,13,16,18	earn 311:20
271:13,14,14	192:6	126:22 143:8	143:24 144:1	earshot 284:18
271:15,22	drinks 91:20	154:9,10	146:1,4 149:16	east 116:22
273:16,17,18	98:7	158:20 181:15	149:18,21,23	117:12 171:19
273:18,19,23	drive 1:17 3:19	182:19 187:6	150:5,12,15	172:3 213:14
274:2,2,3,5,8,8	6:4 83:12	202:13 206:1,3	152:1 153:1,4	256:21 259:21
274:8,9,12,13	84:23 85:15	206:18,19	153:21 159:1	260:1
283:24 289:18	127:8 169:7	219:1 250:12	161:24 163:4	Eastern 1:2 6:10
289:23,24	176:15 197:6	281:5 282:7	164:8 165:5,6	349:2 350:2
292:11 327:1,4	247:11 253:21	drug-related	165:7 166:4,6	eat 168:2 326:24
327:5,6 335:18	254:12 255:17	107:16,19	166:20 177:4	Eddie 182:11,13
335:20 336:7	256:14 263:12	111:23 112:8	181:7,19	182:17 183:24
336:10,20,24	263:13,19	112:10,14,20	182:23 186:24	183:24 184:1
337:24 344:11	330:12	112:23 116:1	186:24 187:5,6	325:1,4,6
345:21	driven 56:23	116:21 117:20	187:7,12 190:3	effect 208:10
doorbell 22:20	85:16 288:19	119:10 120:16	202:11 210:6,8	effort 288:1
doors 32:20,23	driver 271:14,15	122:5 124:22	210:11 211:4	eight 82:22
52:21 58:23	273:18	125:18 126:14	213:1,3 216:14	287:4,6,9
153:6,7,7	driver's 271:14	126:23	227:13,15	308:8,10,14
265:22 274:7	271:23 273:10	drugs 14:6,7	239:1 276:13	309:9,12,14,18
doorstep 71:5	273:12,18,23	15:22,24 18:21	277:8 279:23	eighteen 299:8
doorway 58:23	274:5,12	20:8,8,9 22:17	279:24 280:1	300:4,5
225:20 240:21	driving 171:18	24:17 25:3	dude 157:24	either 75:16
240:22 337:9	175:22 245:5,9	27:21 29:5,6	167:11 285:20	86:10 128:24
338:8	247:2 257:16	30:8,16,19,24	285:21	136:12 163:15
dope 14:1	260:9,15	32:19 33:1,2	duly 8:7 350:7	163:19 197:5
221:11 278:21	263:11 271:18	33:15,17 34:1	dumpster	201:10 204:13
278:21,23	271:20	34:8,11,12,21	338:24 339:1,2	214:7 236:13
281:15	dropped 244:11	37:4,8,13,14	339:6	242:1 243:13
Douglas 230:13	drove 27:11	37:16,23 41:17	Dunkin' 248:18	249:23 305:24
downstairs	84:7 88:16	41:19 42:3,5	248:23 251:7	312:20 319:7
152:6 156:2	160:3 172:9	43:21,23 52:17	E	337:18 345:10
162:16,23	175:20 176:2,2	54:14 57:12	E 3:3 5:1,11	elementary
172:6 187:18	176:3,5 189:20	62:11,13 66:24	E-mail 2:5,14,22	254:4
195:23 215:15	196:23 197:15	72:6,13 76:16	3:5,11,16,21	elevator 169:10
222:9 240:7	245:2 247:23	78:11 83:11	earlier 129:19	169:11 251:24
241:3 248:17	255:9,10 259:1	84:17 85:24	181:7 186:18	
254:18 255:3	264:7 329:11	93:4 105:12		
285:22 328:15	drug 14:20 15:2	114:20,21		
333:17 338:11	15:8,14,18	120:7 121:23		

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 363

186:19 187:1	111:23 112:8	146:22 253:9	114:23	68:5,6,9 69:11
187:15 190:24	112:10,19,23	253:13 254:13	extent 21:14	69:19,24 70:22
191:3,7,12	115:20 116:18	exactly 177:3	112:15 118:5	71:22 72:2,8
193:5 195:20	117:19 118:3	180:7 187:22	172:15 209:12	73:15,19 74:2
195:21,22	118:16 119:10	315:21 326:11	211:15	74:14 75:3
205:8 208:2	120:16,24	344:20	eyes 141:9	122:19,22
250:1,7,16,18	122:6 126:20	examination	F	123:9 130:14
323:11,15	130:18 131:6	1:11 5:5 8:9	F 68:3	Fay's 62:15
Elgen's 191:13	151:19 187:9	examined 8:8	face 73:24	67:10
eloquently	277:17	example 192:7	excuse 7:16	federal 1:12 6:6
108:1	engaging 60:14	Excuse 7:16	338:20 341:11	9:7 11:6,9
else's 164:22	67:7 83:15	109:8 127:24	Facebook 185:2	26:10 34:14
Elsworth 3:7	119:24 122:12	260:3,3	185:3 279:11	49:21 59:13
employee	122:15,18	exhibit 5:13	facilitate 323:19	60:1,13 61:17
350:17,18	123:10 126:10	79:12 98:13,14	facing 259:5,24	68:16,22,23
employment	250:5,16	99:16,18	260:1 272:21	75:23 90:15,19
101:24 102:3	enjoy 90:7 97:13	105:23 106:8,8	272:22,23,24	109:13 129:2,2
102:13,21	97:15 98:6	107:14 115:16	fact 180:24	129:5,8,8,10
104:11	enlist 224:5	124:15 137:13	Fair 28:5 70:4	129:22 131:12
emulate 246:2	323:18	140:8 169:16	fall 142:17	145:7
encountered	enter 325:22	172:14,17,23	falling 321:5	feel 10:6
189:18	331:2	343:7,12,19	false 12:15	fell 206:8 216:1
ended 167:13	entered 255:18	Exhibits 5:20	family 14:14	fellow 81:4
enemy 306:4,10	enterprise	exit 264:22	15:24 34:24	felony 300:21
enforcement	207:12	exited 262:12	35:1,5 48:14	301:17 302:18
18:20 141:2,5	entire 238:10	266:1	48:15 134:15	302:19 312:19
141:8 142:10	epalles@moh...	exiting 262:17	241:1 320:20	felt 240:23 241:4
engage 50:8	2:22	exonerated	far 56:18 59:15	242:6,8 317:15
64:21 92:22	equal 184:9	214:19 298:2	98:11 125:5	female 24:21
125:18 126:23	Eric 2:19 7:9,10	exoneration	142:17 253:19	189:6,11,15
132:13 133:14	7:11	95:5,21 96:14	321:2,3	270:7,11 283:5
150:20,23	errata 349:15	214:17	fashionable	284:12,12,13
151:5,11	erupted 319:18	exoneree 81:4	320:18	285:9 289:6,20
156:17 185:10	estimate 312:2	81:11	father's 244:9	289:23 290:4
237:18 246:12	eve 200:16	exonerees 94:24	264:8 319:5,8	292:6,12
249:14,17	evening 177:11	expected 49:4	favor 37:15,17	fentanyl 33:23
279:14 287:12	event 195:14	expenses 96:15	favorable 81:22	84:20
302:5	331:18	explain 44:11	favorite 327:3	fielding 93:14
engaged 28:16	events 226:18	293:5	Fay 62:8,10,12	Fields 244:10
28:23 49:6	everybody 20:6	extended 212:16	62:13,16,18,20	264:7
52:10 57:16	190:4 214:16	301:24 302:10	63:2,3,4,8,16	fifteen 214:19
69:7 79:1	evidence 25:9	302:11 303:8	63:17,19,22	fifth 222:17
93:15 107:16	129:7 280:11	extension	64:1 65:4,10	225:2
107:18 108:22	evident 117:11	320:17	65:13 66:3	fight 317:21
109:19 111:13	exact 52:20	Extensions	67:11,18,22	347:3

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 364

fighting 212:7 240:12	228:17 334:8,8	328:5	18:11,17 19:17	238:4,6 247:6
fights 319:12	firearm 156:24 157:10	five-minute 79:7 185:20	21:13 22:2,15 25:24 27:23	276:4 285:14 299:7 301:9
figure 121:21 200:24	firearms 156:23 157:1	fixing 337:9 256:4	28:18 29:1 31:5,11 33:13	327:17 338:15
figured 195:2 251:13 269:8	firm 95:3,4 100:20	Flaxman 2:11 2:11 7:19,19	35:7 40:19 41:13 43:12	foundation 17:3 18:12 23:1
file 11:9 91:4 104:19 105:1	first 7:10 8:7 9:16 16:16	7:20	44:1,8 45:2 46:4,14 47:10	26:24 36:12 40:19 52:12
filed 11:6,16 24:9 90:15 200:14	18:9 23:5,8,11 23:13 24:16	flew 88:17 2:4 151:2,2	48:16 49:8 50:2 51:3	61:2 113:14 344:19
Filipino 203:1	27:10 28:23	151:3,4 222:14 222:14 225:15	55:11 57:19 59:21 60:7	four 40:8 93:20 93:21,22
fill 232:4	29:5,10,11	floors 151:19	61:1 63:10	164:19 203:12
filled 235:10,15 294:10	60:18 67:22,23	Florida 92:17	64:4,11 68:21	266:20 299:9
filling 234:10 236:5 294:8,12	71:7 75:24	fly 88:19	70:15 71:1	299:11,18,22
final 24:11	81:15 88:15	focus 189:22	72:10 74:4	four-door 244:19
finalized 24:7	94:11 98:18	208:21 239:11	75:12 76:19	fourteen 300:6,9
finally 180:1	99:21 100:11	324:16 325:16	78:5 79:3,3,20	fourth 222:13 222:17 225:1,1
financially 350:19	103:1,10,10	FOID 328:8,10	81:24 96:17	frame 42:19
find 52:17 63:8 63:8 64:3	106:9 151:3	follow 96:10	104:4,11 107:9	
180:4 190:3,4 246:21 327:17	155:24 170:13	119:2 237:14	109:21 111:16	53:14 117:7,18
328:2	186:9 195:23	293:3	114:5 116:2	118:19 137:22
finding 296:12	215:6 222:7,21	followed 334:6	120:9,19 121:2	208:22 239:11
fine 61:15 297:3	222:24 223:1	following 239:9	123:21 129:20	framed 120:4 121:10,15
fingerprints 328:13	225:18 227:1	239:22 290:11	132:15 138:18	Francine 341:12 341:14
finish 19:20 22:5 115:16,16	237:2 245:18	302:7 315:4,16	139:5 151:21	Frank 2:8 339:12,14
123:3,14 148:4 161:5 171:4	245:20 248:4	326:1 333:4	155:10 158:21	Frazier 162:6
179:6 193:16	248:11 253:5	follows 8:8	168:8,17 169:2	Fred 285:21 286:1,22
199:12 220:16	256:17 286:20	food 91:20	173:13 181:10	287:15 293:16
234:8 295:16	300:20 301:19	176:14,15,17	215:4 228:1	Fred's 286:3
296:17	303:24 305:4	176:20 177:12	235:12 241:16	free 10:6 96:16 207:12
finished 240:3,5	307:13 316:5	force 326:6,21	242:2 277:2	freely 241:24
finna 225:19	317:24 325:6	328:18,21	281:17 282:8	friend 17:21 25:19 28:6,9
260:16 267:22	335:6 337:16	329:1,15 331:1	282:22 297:5	28:15 37:17,18
346:2	350:7	331:15 332:12	306:5 309:16	88:20,24 89:2
fire 201:11,12	First-name 68:4	331:18 314:7	310:18 314:7	162:3 184:22
	firsthand 12:22	321:13	321:13	212:23 219:11
	five 25:3 30:13	foregoing	former 11:13	317:9 318:15
	33:3,7 55:9,10	100:10 349:11	Forney 2:16	
	55:14,19 57:7	179:1	forth 69:6	
	78:12,21 86:12	form 10:18 12:3	179:20,22	
	86:12 93:20,20	12:10 14:2,15	fought 298:24	
	93:22 102:4,5	14:22 15:10,15	found 163:4	
	102:14 172:7	15:19 17:3	177:4 180:23	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 365

318:20	7:10,13,13	30:7 37:13,14	142:23 170:8	167:23 168:4,5
friend's 185:12	272:4	53:9 76:7,8	171:19,20,22	168:19,20,23
friends 17:22	gainerb@jblt...	78:12 121:22	171:24 172:3,6	169:6 172:16
28:10 37:21	3:11	132:3 139:9	172:7	173:8,19
51:21,22,24	gambled 221:9	162:10,11	Glenn's 98:17	174:11,13,14
52:1 63:21	game 136:3	223:21 256:2	GMC 244:19	174:18 175:17
89:22 219:6,9	203:9 248:4	262:2 265:4	go 7:10,10 9:15	176:14,18
front 17:9 32:20	252:10,16,17	281:23 298:24	12:5,11 13:13	177:1,2 178:1
34:22 62:21	252:20 253:6	Gibbs 2:7	14:4 20:2 22:7	178:3,5,8,12
72:16 77:22	329:22 330:24	gift 72:7 219:20	22:7 24:16	179:10,21,23
98:14 99:5	games 338:11	Gipson 2:7	25:4,10 26:1	180:8 181:11
106:6 165:10	games-type	girl 23:24	27:15,24 28:20	184:17 185:3
169:19,23	136:4	219:13	29:2,14 30:6	185:13 188:16
171:14 172:14	gang 149:10	girlfriend 26:23	34:9 35:8 36:1	191:20 192:10
205:18 234:1	154:5 211:24	85:4 345:19	36:18 37:22	192:11 200:1
255:21 259:16	218:2 305:19	give 10:15 19:22	38:2,14,14	205:11 207:23
260:16 270:1,4	314:17 315:1	33:7,10,17,23	39:21 41:15	207:23 208:22
270:24 271:14	Gangster 19:2,6	37:4,8 42:4	43:15 45:14	209:14 211:11
271:15 272:24	29:18,19,20,23	55:7,20 58:11	48:19 49:21,22	216:21 217:1
273:19 274:17	30:4 149:8	64:10 66:2,3,7	51:5 56:24	217:12 219:15
300:12	158:5 213:22	70:12 72:18	57:20 77:7,17	219:17 220:18
fuck 147:18,22	214:3,5 215:1	78:13 82:13	78:7 79:22	220:22 225:17
148:9,13,18	218:9,10,11,12	85:18,22 87:7	80:20,21,21	225:17,19
167:12 203:17	218:19 219:7	93:4 113:20	86:23 88:5,9	231:1 234:5
204:18 271:4	219:10 306:2,4	116:21 119:17	88:10 90:9	236:19 237:20
274:23 332:23	306:10,13	137:15 138:12	91:22 94:17	238:20 241:13
334:11	322:21	138:15,16,22	97:5,7 98:11	242:1 243:13
 fucked 203:7,16	gate 317:23	139:1,2,3,17	99:22 102:19	243:14 248:17
275:18	327:5 335:20	139:24 140:2,5	104:7,22 105:9	248:18,21,22
 fucking 228:12	336:7	148:4,15	105:17,17	249:10 250:12
 full 62:15 288:5	gay 19:5,6	157:17 169:23	106:16 108:10	251:11 252:2,9
 Fullbanks 202:6	geographic	182:23 192:5	109:23 110:9	253:10 255:3,3
 Fuller 21:23	115:20 116:17	206:7,9 242:21	110:21 112:5	255:4,12,15
 fully 290:5	116:20	256:16 271:4	112:16 116:7	256:5,12,23
 Fumbanks	George 2:16	274:23 280:1	117:1 120:20	258:8 260:4,16
202:7,8,21	Gerard 16:11,16	281:24 299:23	121:8 123:5,16	261:17 263:18
 funeral 184:23	16:19 46:18	300:18 333:24	124:9 127:17	264:6,9,10
185:12 213:16	47:2,4 48:6,10	341:22 345:24	128:13 130:23	265:12 266:6
213:17	48:22 49:22,24	345:24 346:21	132:17 134:24	273:15 274:17
 further 178:24	178:4	346:24 347:4	138:22 143:23	277:3,13
266:24 350:12	Gerard's 47:7	given 8:19 125:5	145:6 151:22	280:14 281:18
350:16	47:14 48:8	139:19 349:11	152:4,18	281:20 282:9
<hr/>	gesturing	349:14	158:22 161:11	283:1,5 290:15
 G	188:12 230:8	giving 139:9	163:19 165:1,3	292:11 296:18
 Gainer 3:8 7:8	getting 11:5	Glenn 13:22	166:18 167:11	297:7 298:20

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 366

300:15 304:22	228:12,20	309:8 320:16	38:12 41:1	301:13 303:17
309:2,8,8	230:14 231:8	346:1	56:19 58:23	303:20 305:18
310:19 312:13	231:13,18	gotten 123:17	60:11 61:7,12	gun 225:3
314:10 315:13	237:17 240:7	175:19 221:24	70:18,21 72:7	302:17,19
320:14 321:10	242:1,1 252:2	325:21	75:4 76:22	303:2,5,6,11
322:14 323:21	253:12 254:15	government	81:4 85:19	303:11,21,23
324:1,9,21	256:15,21	60:2 75:23	89:18 90:8	304:8 319:9
328:15 329:17	257:16 258:4	129:8,11,22	93:24 95:7	326:6,20
331:11 342:12	259:8,9,11	131:12	104:12 118:7	328:18,21
346:1,2,3	263:8 266:6,17	governors 219:6	127:22 156:8	329:15 331:1
go-between 37:8	270:16 276:19	grab 329:6	156:19 157:3	
goal 277:15	284:11 285:23	grabbed 155:12	163:10,19	gunfire 319:18
goes 338:18	285:24 292:11	226:2 271:8	164:13 167:4	guns 327:7,12
GoFundMe	292:23 299:5	330:18	197:11 198:9	327:13,14
184:24 185:1	299:23 307:17	grade 343:24	199:5 200:23	gunshot 157:18
going 8:16 10:13	317:21 321:19	Grammar 51:17	210:6 217:9,14	165:12 317:13
18:10 34:7	332:1,1,23	grams 25:3	217:15 218:23	321:21
36:10 44:14	334:1,1,4,4	30:13 33:3,7	223:19 224:8	gunshots 317:23
55:20 64:21	338:10 343:14	55:9,10,15,19	226:1,4 237:12	guy 157:22
66:3,14 88:23	343:18 347:3,4	57:7 78:12	240:23 244:13	158:3,6 184:4
91:4 95:17,24	gold 329:21	86:12,12	244:21 246:2	203:18 211:10
96:10 103:16	333:9,10	grandfather's	261:15 276:12	261:10 266:15
119:2 123:13	Goleather 2:16	178:1	277:15 278:22	279:8 282:12
124:8,9 131:11	gonna 115:15	granted 200:18	281:10 285:6	284:10 285:5
132:5 134:18	328:4	grass 201:12	289:13 291:5	286:1 291:11
135:15 136:18	Gonzalez 189:20	great 97:23	296:20 297:24	291:14 293:1
140:8 148:19	197:14,18,19	Gregory 212:22	303:18 309:21	307:20 318:15
157:21,21	198:10 199:24	grew 19:1 90:1	309:24 310:21	328:18 330:5
160:1 161:11	200:4 204:13	Griffin 4:4 7:22	325:22 327:22	330:15 337:15
162:1 163:5,8	210:1 230:18	GROBLE 2:19	333:7 338:9	338:21,21,24
164:5 166:24	230:21 232:20	ground 9:15	341:1 342:18	339:1,3,6
167:11 169:12	232:23 233:1	192:17 317:16	346:11	guys 247:6,11
169:17,21	234:13,22	group 117:21,22	guessing 18:19	285:17 286:23
170:18 171:3	235:1,16,18	232:2 288:1	233:3 263:17	287:5 292:23
175:6 177:5,23	236:5 291:6,20	327:9	296:3 297:24	293:11,13
179:10,11	292:17 335:4	groups 317:21	298:1 329:22	317:12 318:1
180:19,22	335:14,16	Grove 196:24	345:6	319:19 320:4
185:18,19	336:1,5 337:13	growing 51:11	guest 95:3	gym 53:12
190:4,5,18	good 7:8,13 8:11	grown 49:3,5,7	Guilt 142:14	H
197:17,20	70:4 98:2,6	49:13	guilty 34:14,17	H 5:11
198:15 204:20	101:9 157:23	guarantee	34:21 47:18,23	H-O-L-L-I-M...
204:22 206:6	310:17	299:23	158:11,14	185:8
211:11 215:11	google 135:15	guess 12:7,23	238:4,6 298:8	hair 330:5
219:15,17	gotta 193:16	18:15 24:9	298:12,17,22	Hale 3:2 7:3
225:16,17	220:16 295:16	26:3 37:15	299:2,7,18	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 367

64:10	54:21 61:22	231:22 243:19	160:23	321:12,20,23
half 324:5	69:11 177:10	272:1,6 275:15	Hen 89:5,6,6,8	322:1,2,8,12
halfway 304:6	188:18,20	280:8,24 281:2	Henderson 2:16	323:5,8,9
hallway 145:24	194:23 196:21	292:13 306:8	Henry 2:9 88:12	324:17,23,24
151:1 152:7,10	219:12 225:22	317:13,15	88:13,20 89:7	325:9,16
191:17 222:19	236:9 264:24	319:21 326:24	89:14,21 90:12	heron 33:3
222:20 225:3,4	268:10 269:23	330:1 339:2	90:22 91:3	136:17 278:10
225:8,9 227:4	295:22,24	340:7 346:15	214:6	hey 37:22 59:20
243:12 310:12	297:12,17	346:16,18	heroin 33:20	175:11 179:9
337:9	303:21 333:8	heard 137:7,10	39:2,7 40:18	292:9 307:21
hand 66:4 83:4	338:4 342:18	167:8 181:24	40:24 41:4,7	345:23
83:6,8 129:13	344:10	200:16 207:4	41:12 45:12	hide 278:20,21
169:20,21	happens 197:9	217:22,24	54:1,16,18,22	278:22
224:16,17	200:1	218:1,3,4	54:23 55:1,6	High 59:2
225:20 226:7	harassed 240:15	270:6,11 272:8	55:10 56:1	high-level
226:24 227:2	241:5	272:10 279:18	57:7 58:1 59:7	202:13
227:10,10,12	harassing	280:9,15	65:11,12,13,17	high-ranking
228:5 256:17	240:10	282:16,18,18	65:24 66:2,5,8	333:7
265:9 266:9	harassment	286:13 306:9	66:11 67:2	higher 199:21
268:14 271:6	241:4	308:3 317:3,23	70:11,13 71:8	199:22
310:5,7	hard 84:17	317:24 318:3	71:22 72:5,8	highly 276:22
hand-to-hand	162:23 178:15	338:23 340:9	73:2,4,7,13	hired 224:11
150:20,24	hard-on 241:19	340:12	84:6,20 85:13	Hispanic 81:12
151:5	Harold 341:6,8	hearing 137:11	86:9,15 87:4,6	283:15
handcuff 289:14	Harris 3:19 7:5	167:9 216:23	87:8 93:10	history 300:13
handcuffed	7:5,21 110:24	272:3 295:18	108:18 113:24	hit 318:4
197:10 199:7	Harrison 331:12	296:5,13	114:9 122:23	Hold 96:5
232:2 290:10	331:14	297:10,11,11	126:8,11,24	109:21 123:2
293:11	Harry 341:7	298:1 331:22	136:14,19,21	217:10 249:8
handcuffs	Harvey 2:15	hearsay 277:19	144:3,8,13	331:4
192:24 195:18	322:3,4,10	277:21 340:10	149:24 165:23	holding 346:21
195:22 227:14	323:1,6 324:18	340:12	181:20 182:3,8	hollered 290:3
229:9 242:9,12	324:23	heart 206:6,8,9	182:9 183:12	292:11
268:22,24	hat 333:9	206:14,15	183:22 184:6	hollering 199:2
274:22 283:22	hatchback	heated 192:15	206:1,23 208:2	199:3
327:15	270:2 273:4	heavy 239:1	213:4,6 216:5	Holliman 185:6
handle 274:8,14	he'll 65:7	held 296:6	216:11,18	185:9
hands 225:9,10	head 26:20 92:6	Helen 244:12	224:19 225:12	home 13:22
272:17 275:13	131:21 201:22	Helen's 244:14	227:9,16,17,21	14:14 16:1
hands-on 329:6	headed 285:7	help 74:8 133:19	227:22,23	17:1 31:24
hang 276:9	hear 64:15	134:2,4,8,10	228:1,4 276:10	35:1 45:17
hanging 205:5	144:23 154:23	149:5 198:19	276:16 288:11	53:3 69:18
317:18	162:6,14 164:2	224:5 311:1	308:17 315:22	135:19 175:7
happen 235:9	164:3 188:14	323:8,19	316:1,5,7,10	180:8 187:23
happened 47:14	229:11 230:1	help-at-home	316:16,19	188:9 247:20

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 368

248:1,6 255:15	337:5 342:19	101:23 102:13	incarcerated	117:22 130:5
264:11 282:13	342:21	107:17 116:17	24:9 26:5,16	166:3 214:23
326:6	household 46:11	117:22 137:17	102:22	224:5 276:16
Homes 154:21	housing 125:19	314:4	incarceration	287:11 308:17
hood 270:3,4,5	huddled 235:3	identity 158:9	302:23 305:4	336:22 337:2
271:1 274:18	huh 205:22	IDOC 103:4,18	306:18	informant 60:1
Hoover 218:15	hundred 278:8	ill 223:14,21	incident 307:5	342:17 345:13
218:24 219:4	hung 28:2 73:18	illegal 13:18,21	336:24 337:21	information
Hopkins 338:19	346:12 347:7	14:13 16:24	338:1,3,5	64:20 100:13
338:20	hungry 221:23	17:11,17 18:9	include 104:3	106:20,22
horn 255:13	Hyatt 161:14,18	22:14 25:21	105:12 109:18	107:1 110:14
Hospital 160:22	169:8 172:9	28:16,23 33:10	113:4,13 117:4	118:2 132:20
hot 92:16	Hype 54:11	33:11 36:21	117:8,13 118:2	138:2 140:21
hote- 176:18		38:9,11 39:3	118:15 119:23	168:23 172:1
hotel 161:21		41:22 44:6	124:1	173:9 277:17
167:24 168:1	I-bond 331:19	45:8 48:5 50:8	including 6:21	286:11,16
171:24 175:15	i.e 107:20	58:19 75:1,7	112:13 115:21	initial 67:24
175:19,20,22	ID 327:20	79:19 80:17	293:16	68:1
176:6,13,23	Ida 19:7 51:12	83:2,11 84:12	income 13:7,10	initially 176:8
177:11,14,19	62:17 114:21	85:11,21 87:15	14:10 15:3	262:8
177:23 178:12	124:23 125:19	115:10 126:6,9	77:1 105:7	injured 320:13
178:18 179:4	150:15,21,23	126:10,19	137:17 144:19	injury 321:19
179:11,17,19	151:12 153:17	133:4 156:21	144:20,23	Innocence 94:14
179:21 180:8	158:20 159:3	159:2 210:22	145:4,5 311:20	94:18
hotels 180:5,11	167:16 173:9	302:5	incorrect 112:3	innocent 158:15
hour 185:18	174:8 175:12	illing 223:12	167:20	inside 17:2
hours 160:24	202:10 205:11	Illinois 1:1,17	independent	40:12 43:6
331:6 347:24	210:19,23	2:4,13,21 3:4	175:24 263:21	46:9 58:19,22
house 17:2	211:4,21 217:6	3:10,15,20 6:5	263:24 264:3	58:23 69:21
18:10 21:12	218:8 249:15	6:10 137:18	indicated	79:19 83:3
45:5 58:8,22	249:18 250:17	216:12 349:1	349:15	84:9,13,20
66:7 69:21	282:4,6,17,21	350:1,2 351:2	indicating	85:8,12,18
85:14,15,17	306:12,14	351:10	253:22 260:18	86:2 140:2
87:7 139:1	307:3 309:2,7	impact 304:3	319:22	151:12,20
156:12,15	310:11 311:2	320:19	indirectly	162:11,24
178:1,6 195:11	311:14 312:5	important	119:10 120:16	186:17 189:22
195:15 215:23	315:5,22 316:2	113:13	124:22 125:21	190:11,16,18
222:12,12	316:16,19	impoundment	350:19	192:13,18
243:11 244:10	321:20 322:17	295:10,18	individual 7:2	193:12,20
244:12,14	idea 246:21	impression	55:14 64:20	200:5 204:9
248:16 253:2	identification	24:10 110:2	69:6 82:13,18	246:15,15
264:8 279:6,14	79:14 172:24	111:10,20	223:10,11	248:8 255:12
282:21 301:9	343:13	113:8 117:6	288:6 338:18	262:1,4 263:4
304:23 313:23	identifies 24:21	inappropriate	345:12	263:8 267:20
326:22,23	identify 6:13	109:10	individuals	269:24 273:10

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 369

273:15 291:3	137:15 140:19	64:17	45:9,11,14	jersey 291:15
293:19 318:4	140:22	Island 178:23	48:5 50:1,7,14	Jimenez 82:4
338:13	interrogatory	<hr/>	55:2,3,6 56:1,2	Jimmy 244:18
inspection	29:24 38:18	J	56:5,13,24	244:19 254:15
195:11	62:7 99:13	J 3:23	57:3 66:1,2,5,7	254:17 263:14
instance 6:17	101:2,19	Jackson 2:7 3:3	67:2 71:23	296:6
237:16	102:12,20	jaf@kenlaw.c...	73:11,12,15	jive 256:16
Instanter 6:2	105:13 107:13	2:14	75:4 76:2 77:3	Joanne 249:23
instructing	108:21 113:23	jail 16:20,21	84:9,19,23	249:24 251:9
95:19	115:19 117:19	93:24 94:1	85:8,10,11,13	job 13:7,11,17
instrument	125:8,17	148:19 162:2	85:20 86:16	14:12,14,17
157:12	137:16 138:2	163:5 164:5	87:7,11,15	104:9,16,16,19
intensified	140:9 144:12	167:1,12 177:5	88:11 89:21	105:20,22
154:5 314:17	307:9 311:16	180:19,22	90:2,11,22	334:11
315:1	intersection	190:4 194:4,16	91:3,10 92:7	jobs 103:3,17
intention 111:19	257:3	200:11,12	93:5,9 96:14	Joel 2:11 7:19
intentionality	interview	202:5 207:19	123:11 131:2,5	jogging 290:7
110:18	168:14 170:7,8	207:20 208:1	132:13 133:20	JOHNSON 3:8
intentionally	170:21 171:2,9	212:5 219:3,12	133:22 134:3,5	jointly 117:20
110:14 111:12	173:12 175:8	228:12 231:13	134:8,9,10,12	Jones 3:6 143:6
interaction 32:9	318:7	231:19 237:24	134:21 135:6	146:13,15,17
33:4 205:16	interviewed	270:17 293:7	135:18 136:1,6	146:18 147:3
interactions	170:5 175:2	298:23,24	136:14,18,21	147:16,17
20:12 27:22	interviews 175:1	299:16,16	138:12,13,15	148:13,18
28:4 32:18	intimidate	301:10 302:8	138:16,21	153:20 165:19
59:23 62:12,22	241:20 243:4	314:19 317:7	139:3,10,12,16	190:10,13
208:8 239:18	intimidation	324:5,7,9	139:20 140:1,3	194:2 197:3
239:24 319:1	240:24 241:10	328:4,6 331:21	140:5 160:9	201:4,8 202:22
335:15 336:13	241:15,16,16	334:2,4 338:17	168:1 169:7	204:17 205:3
336:21 337:1	242:3 243:7	Jamar 17:19,20	176:12 177:12	205:15 209:5
347:14	Intrepid 160:5	17:24 18:3,9	205:7 214:3	210:7,10,18
interchangeable	introduce 6:20	25:15,18,21	Jamar's 31:4	228:23 229:3
208:6	8:1	26:4,23 27:8,9	88:24 89:2	229:14 232:14
interest 60:17	inventoried	27:16,22 28:5	Jamell 2:8	234:17,18,24
Interest-free	220:4,8,13	28:9,15,17,24	James 2:7	235:21 241:20
82:9	investigative	29:6,12,17,17	janitor 278:18	242:4,7 243:2
interested	170:1	30:9,17,19,21	342:3	243:8,16,19,22
350:19	involved 37:24	31:1,14,17	janitor-type	264:22 267:11
intern 7:22	49:24 57:10	32:4,7,15 34:2	279:20	272:8,19,21,22
internal 196:14	107:22 124:22	36:9,9,18,20	January 9:2,3,5	273:9 275:11
interrogatories	125:21 130:4	37:1,2,20,23	23:19 74:11,24	275:17,21
98:18 99:21	160:22 166:3	38:4,10 39:8	216:4,13	285:10 286:11
100:11 101:13	involving	39:11,14,21	Jaron 4:2 6:2	292:17 330:13
102:9 106:2,10	126:24 340:16	40:12,17 41:22	Jeep 244:20	330:21 333:3
106:19 111:23	irrelevant 12:4	42:4,5 43:10	Jefferson 2:7,16	335:11

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 370

Jordan 278:24 279:1	K K 3:13 Kallatt 2:23 7:12 106:1,9 211:9 Karen 3:23 Kedzie 331:12 331:14 keep 17:11,14 45:8 76:15 122:2 138:8,9 210:5 214:9 220:15 Kenneth 2:11 203:21,24 291:13 335:13 Kenny 203:7,16 203:20 204:18 Kenny's 203:18 kept 77:9 194:8 199:2 327:22 key 136:17 165:4 246:19 246:20,20,23 247:7 264:19 268:14 342:1,2 342:3 keys 50:14 245:8 263:12 265:8 265:24 266:8 341:22 342:5 kicked 162:15 162:20 kicking 162:7,24 164:3 167:7 kickstand 321:4 kid's 90:4 kids 23:24 49:10 97:7 152:13 161:8 163:13 175:18 176:3,7 176:9,21 junkie 19:15 20:5 54:9	215:20 216:16 216:19 248:6 254:6 267:7 299:4 320:22 320:24 336:7 killed 195:12 219:12 kilo 136:14 kind 160:4 194:12 212:16 244:15,16 245:13 288:10 kinfolks 178:3 King 59:1,2 176:15 253:21 254:12 255:17 256:14 Kirby 3:23 knee 317:20 knees 192:19,20 193:3 knew 11:16,20 19:11 25:20 47:12 48:17 51:11 83:24 157:24 161:22 161:23 175:14 180:14,16 194:4 199:8 211:11 246:11 246:14 285:20 319:15 341:5 345:12 knock 152:11 188:14 327:4 knocked 22:21 186:12 335:17 344:11 345:21 knocking 72:21,24 73:15 186:11 327:1 knockout 207:3 207:7,14,18,20 knocks 22:19 know 8:21 9:19 10:10,22 11:11	12:8,14,20 14:18 15:22 18:15,24 19:3 19:5,5,6,7 20:14,17 21:9 21:18 22:4,9 23:12,16,18 24:15,20 25:18 26:4,10,17 27:8,9,10,14 27:20 28:4 29:15,18,20 31:8,22 32:6 35:11,12,20 36:8,24 38:7,8 38:18 39:12,12 39:13,22 40:23 40:24 41:3,9 41:10,17,18 43:13,17 45:19 46:15,17 47:13 47:14 48:4,9 48:21 50:6,11 52:1,2,8 53:1 54:3,6,6 55:3,4 55:8,8 56:8,10 56:12,14,14,18 56:20,22 58:6 59:10,10 60:9 61:5 62:6,7,16 62:16,20 63:5 63:6,7,12,16 63:20,21 64:6 64:16 65:4,16 65:20 66:14,15 66:24 67:11 68:1,2,2,4,20 69:4 70:21 72:21,24 73:15 73:17,19,20,20 73:21,24 74:9 76:7,8,14 77:9 77:9,12 78:11 78:22 79:21 81:8,9,19 82:1	82:3 84:15,17 84:18,21,22 85:1,19 87:11 87:13,17,18 88:4,16 89:3,4 89:18,18,20 90:13 91:23,24 92:10,11,14,15 92:18 93:13,14 94:13,13,24 96:24 97:1 99:8,10 102:18 105:2 109:11 113:10 117:22 120:1 124:19 125:3 127:5,19 128:19,24 129:4,5 130:1 130:6 131:4,7 131:9,12,15,16 132:24 133:12 135:1 136:9,10 136:12,15,16 136:23 137:12 140:4 141:22 142:8 143:4 148:11,21 149:9,11 153:22 154:19 157:5,20 158:6 158:6 159:17 160:6 161:2,2 161:17 162:12 162:13 163:3,6 163:19,24 165:15,22 166:1,5,7 167:19,22 168:3,12 169:5 169:6,9,22 172:15 173:16 174:24 175:13 177:1,14 178:4 179:8,9 180:3 180:7,21,21
-------------------------------	--	--	--	---

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 371

181:24 183:1,8	239:3,13,13,16	318:1,2,13,23	Lamonica 3:7	297:23
183:10 184:4	240:17,20	318:23 319:19	land 222:18	lease 23:21
185:1,14	243:18,21,22	321:3 322:9,11	landing 222:18	leave 30:3 121:5
187:17,22	244:16,17,17	322:19,22	225:1	134:23 180:9
189:10,14,18	247:1,6 248:15	323:23 326:4	lane 201:11,12	241:13 243:11
189:19 191:6	249:12,23	327:8,14,22	228:17 334:8,9	246:1 248:11
191:12,15	250:9,11,13	330:10 332:7	Larry 218:15,24	248:15 253:7
192:1,8,10,16	251:12 252:24	332:11 334:21	219:4	299:17 323:24
194:1,15 195:5	253:1,4,10,13	334:23 336:4,8	LaSalle 3:14	328:15,15
195:22 196:9,9	253:13 254:13	336:11,16	late 120:14	346:3
196:10 197:1,7	261:6,6 263:10	338:18 339:5,7	209:8	leaves 32:7
197:19,20	263:10,17	339:17,21,23	laugh 193:23	leaving 254:14
198:20 199:17	265:23 266:16	340:9,10 341:6	laughed 190:12	254:17 274:24
201:3 202:12	269:17 270:7	341:8,10,12,15	laughing 190:13	led 48:23 154:7
202:14,23,24	270:12,23	342:7 343:19	193:21 194:3	154:8 312:22
203:6,8,9,12	271:8 272:20	344:20 345:17	law 2:11 18:20	Lee 2:8 339:12
203:12 204:8	274:2,6 275:8	knowingly	95:3,4 100:20	339:14
204:15 205:1	276:12,19	33:24	141:1,4,7	left 39:19,20
205:22 207:5	278:1,1,3,4,5,8	knowledge	142:10	69:14 110:14
207:15,17,20	278:11,13,14	12:22 30:14	Lawrence 342:8	111:12 176:14
208:1 210:3	278:16,17,18	40:17 41:11	342:10,23	176:16,20,22
211:14,16	278:20,24	48:7 78:24	343:1	177:13 194:16
212:5,5,10,13	279:5,12,21,21	100:13 101:17	lawsuit 8:16,18	212:15 229:20
212:14,16	282:11,24	106:22 107:1	11:6,10,17,18	248:2,13,13
213:13 214:2,4	283:1,12,13,19	140:20 168:22	81:13,17 90:15	251:14 253:9
215:14,17,21	284:9,9,15,17	185:9 279:15	90:23 91:4	254:24 255:18
216:1,2,2,16	285:18,18	282:2	lawyer 61:12,17	257:8 271:17
216:23 217:14	286:4,7,9	known 17:24	108:5,9 116:19	286:1 318:5
217:20 218:18	287:11,14	51:14 115:21	116:24 131:17	320:15 336:9
219:2,3 220:24	291:11,12,15	knows 193:23	131:18 313:20	leg 317:18
221:7,7 223:2	291:18 292:5	Kurt 285:21	313:21	320:15,15
223:23 224:2,3	292:20,22,23		lawyers 101:8	321:1
224:9,10	293:2,21 294:8	L	211:13	legal 145:5
225:13,14	296:5 297:2,9	label 26:3	layers 290:8	229:6 298:18
226:2,4,13,14	297:17,24	laborer 13:6	lead 234:10,12	legally 257:8
227:21 228:2,8	300:17 305:22	lady 88:14 90:2	leader 218:8,10	LEINENWE...
229:18 231:7	306:3,7,12	157:18,20	leading 32:21	3:13
232:1,23 233:7	307:9,21,21,22	158:13 249:23	257:14	Leonard 2:7
233:7,16,19,22	307:24 308:2	275:4 282:12	Leano 202:24	lesbian 63:3
234:1,7,8,12	308:16,20	285:4 289:16	227:7 229:16	let's 23:4 24:16
234:17,19	309:10 311:9,9	290:3 292:11	230:4,10,13	27:15 30:6
235:2,3,11	311:17,22	340:22 341:5	232:9	42:11 79:7
236:1,7,18,21	312:1 313:8	341:21	learn 209:18	98:13 105:23
237:4,5,9,10	315:18,19	laid 97:21	261:4 317:4	106:23 107:13
237:10,12,16	316:9 317:22	Lake 248:24	learned 171:22	119:8 124:17

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 372

124:17 127:10	light-skinned	152:20 162:18	234:2,7 237:7	lost 60:17
128:3 137:13	279:8	162:19 187:17	238:20 247:4,5	103:19 245:8
147:5 172:18	lights 197:24	253:20 265:16	249:22 254:9	246:19,20
185:13,23	256:3 258:21	267:5 305:6	254:12 285:1	263:11 264:19
209:1 211:23	limited 108:17	322:11,19	304:17 308:21	321:1 333:24
219:14 239:8	110:5	345:18,19	309:4,5,10	lot 18:7 22:21
244:5 267:24	line 64:18 95:18	lives 52:8 87:21	316:14,24	115:4 141:15
283:1 288:18	105:5 108:6	living 16:17,19	319:3	141:17 206:19
300:18 312:13	206:1,2,3,22	17:10,15 23:23	longer 30:5	206:21 211:12
324:1,16,20	207:2	23:24 39:23	241:13 291:13	221:9 255:18
343:9,11	lines 197:8	58:2 85:23	291:13 337:17	255:18 256:1,2
347:17	206:18,19	151:16 182:18	look 20:6,7,7	256:9,12 260:6
letter 300:5	lion's 173:18	190:21 217:3	98:13 99:23	260:10,11,13
lever 274:14	Lionel 2:9,9	279:12 306:18	101:18 105:23	260:15,18
levied 297:3	listen 60:22 61:8	LLC 3:2,13	106:12 107:13	267:8,12 283:2
Lewis 3:7 17:19	listened 60:16	Lo 4:3 164:13	117:17 119:8	285:8 329:20
17:20,24 18:9	61:24	loan 81:2,3 82:6	124:17,17	340:5
25:21 26:23	listening 7:23	lobby 172:5	126:6 130:2	lottery 221:10
27:9,16,22	173:21	249:1,21	137:13 140:9	loud 106:16
28:5,9,15,17	litigation 110:16	251:17,20	157:23 173:1,5	236:3 281:1,2
28:24 29:6,17	little 7:23 56:22	313:16,19	178:16 210:1	love 94:4
30:7,9 31:14	176:15 178:3,9	location 6:21	217:16 241:12	low 52:19
31:17 36:9	178:24 185:19	115:20 116:17	261:22 274:17	lower 226:6
37:1,2,23	195:9 202:23	116:21	288:3 317:17	lucky 282:13
38:10 39:8,11	210:2 255:20	locations 117:23	320:18	Luella 213:13
39:14,21 40:12	258:12,15	lock 266:5 274:7	looked 225:10	213:14
40:17 41:22	259:16 266:24	274:15	227:19 255:23	Lumina 160:9
45:9,11,14	267:24 274:2	locked 219:3	256:7 261:16	169:7
50:1,7,14 55:2	279:7 288:5	265:22 291:9	262:17 265:8	lunch 115:13
55:3,6 56:1,2,5	291:12 307:20	locking 336:7	268:13 271:8	124:9 127:11
56:13 57:3	308:1,4 330:4	locks 342:3,4	looking 99:3	<hr/> M
84:9,19 85:20	330:15 337:14	lockup 200:1,3	115:18 161:22	machine 13:5
87:15 89:21	337:15 346:10	236:11,12,14	171:23 173:6,7	mad 196:9,12
96:14 123:11	live 39:16 40:3	Loevy 2:2,2 6:23	173:10,17	Madden 136:5
131:2,5 132:13	47:4 56:5	100:21,21	177:15 179:8	252:18
136:14 138:12	63:19 149:12	logical 276:18	180:17 181:1	Madison 56:20
139:3 214:3	183:7 216:17	logically 204:21	185:14 186:23	56:21
Lewis's 29:12	216:18 304:22	long 17:24 32:4	225:16 231:10	Mahoney 239:6
56:24 87:11	322:10,17	32:6 51:14,16	270:3 273:1	mail 163:22
lie 191:17	lived 16:8,23	51:20 55:22	338:6 343:5	165:6
lieutenant 329:5	20:18,23 39:10	82:20 86:11	looks 343:16	mailbox 153:23
330:6 340:20	39:19,19 40:1	93:18 97:9	Lords 306:8,9	153:24 159:13
340:21 341:2	42:20 48:14,15	135:6 136:6,10	306:12	161:24 163:2,4
life 320:12	56:10,14 63:23	180:4 184:14	lose 203:10	163:8,17 164:8
light 31:22	115:6 149:13	200:13 207:13	246:23	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 373

164:15,17,18	March 18:15	McGRATH	melt 246:22	293:2 325:19
164:18,19,19	24:13 27:17	3:13 7:16,16	melted 247:7	mini 178:9
164:22,23	208:19 209:1	272:5	member 46:11	Minnesota
165:2,3,4,5,7,8	209:10 211:23	McNairy 2:8	205:16 239:24	135:14
165:10,19,23	212:11 215:7	Meadows	240:16,19	minute 111:1
166:4,13,16,21	215:24 216:4	248:24	members 35:1,5	113:12
166:21,22	216:13 219:15	mean 11:4 12:17	134:15 142:1	minutes 40:8
177:5 180:23	222:2,6 226:12	33:7 39:12,20	156:3 209:10	185:19 251:19
190:5 203:22	226:18 230:20	40:23 41:1	210:21 211:2	254:13 268:1
205:10 212:15	237:2 238:2	43:17 50:10	211:18 239:19	274:16 285:7
212:17 290:17	239:10,23	52:1,16 55:4	241:1 294:4	331:7 347:24
342:18 344:24	246:6 249:17	56:7 75:18,20	329:1 334:16	Mirandized
347:12	250:15 290:12	77:21 85:16,19	340:16	229:9
mailboxes	300:3,10	86:12 93:7,24	membership	mirror 261:22
164:19	326:12	94:2,23 104:19	30:3	261:24
majority 139:23	Marcus 2:7	111:8 132:22	memento	mischaracteri...
233:2	marijuana	132:23 142:15	327:23	314:8
making 20:1	38:11,13,15	143:9 152:9	memory 100:13	mischaracteri...
37:13,14 142:8	67:1 75:6,7	155:12 156:14	106:20,22	15:11,20 22:2
220:16	84:18 93:7	156:19 167:6	107:2 140:21	33:12 46:5
male 189:11,15	119:18 120:6	176:18 187:4	321:11	51:4 60:8 74:5
man 19:5,6	126:6,16,16	193:23 196:11	men 189:4	75:13 76:18
21:23 49:3,5,7	127:4,5 136:3	196:12 203:18	Mercedes 27:11	78:6 79:4
49:13 164:5	182:1,1 250:19	204:19 205:24	85:1,4,8,12,15	96:18 104:13
167:11,12	250:23 337:7,7	206:5 221:16	85:16	105:15 107:8
203:7,15 204:8	mark 112:9	223:8 235:6,7	message 65:4	109:22 110:17
211:12 218:22	172:14,17	237:19 238:12	Messenger	111:15 120:8
278:15,16,17	185:4,9	238:14 240:11	185:2	121:12,18
278:21 279:19	Mark's 185:5	240:21 241:3	met 44:20,22	124:24 128:12
279:21 280:20	marked 79:13	246:4 248:19	88:15 219:4	130:20 138:6
281:14,15	106:2 172:24	279:23 281:10	317:9	149:1 209:13
282:4,6,11,12	261:8 343:13	282:19 287:2	mic 132:3	249:8
282:14,16,18	marking 169:16	292:22 306:11	Michael 3:17	missed 106:24
282:20 292:9	marry 24:12	330:17 339:20	160:21	332:21 337:11
307:21 328:23	Marvin 81:8	means 29:2	Michelle 52:4	misspoke 10:5
334:11 345:23	mass 214:17	40:24 187:11	Michigan 2:12	106:21 135:24
managed 341:16	Mathew 3:17	mechanic 279:2	346:4	misstates 14:3
manager 341:19	matter 6:8 61:17	279:7,15,16	middle 32:23	25:9 104:5
Maneuver	matters 40:8	medication 9:12	67:24	143:20 144:15
243:24	Maurice 336:9	meet 36:18,20	Mika's 222:12	183:16 280:11
Manny 202:24	Mayfield 27:6,9	44:15 56:2	Miller 342:12	282:9
203:4,5 225:19	McCormick	58:14 83:13	Milwaukee	mistaken 158:8
227:3,4,13	161:10,14	84:7 322:16	178:3 183:7	174:20 312:20
manufactured	169:8 172:9	Megan 3:13	mind 145:3	mix 133:4
107:21	McDaniels 2:8	7:16	mine 263:12	mixing 154:3

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 374

mkm@ilesq.c...	220:12 221:8	105:8 240:23	286:3,8,20	67:8 69:7,15
3:16	221:14 223:13	241:10,13	308:22 310:23	69:19,24 70:23
Mm-hmm 162:5	277:14 311:7	242:2 243:13	313:8 318:21	71:21 72:1
172:21 239:12	311:19,23	244:1	318:22,23	74:2,14 75:2
Mohammed	312:7 333:24	moved 16:17,17	338:18,23	75:11 77:2
2:23 7:12	340:22 341:3,4	23:15 24:1	339:5 341:13	78:3 79:1,19
211:9,18 240:2	moneys 123:6	39:24 42:22	342:13,24	80:17 83:2,15
287:24 291:5	138:3	43:4 244:9	345:20	84:12 85:12,18
291:20 292:22	Monico 3:2 7:3	256:4 304:7	named 27:9 62:8	85:21 87:12,15
293:9,19 294:5	64:10	336:10	183:4 184:5	87:21 89:9,12
294:14,19	Monroe 2:20 3:9	moving 244:8,11	195:10 211:10	89:13,14 92:22
295:5,9,15,18	month 23:4,16	247:22 264:9	249:23 278:24	93:5,15 104:3
295:19 296:9	35:20 68:14	264:10	286:5,8 307:20	104:10 107:7
337:16,16	82:16 88:7,8,9	multiple 110:18	339:7,23 341:6	108:22 109:18
Mohammed's	94:17 154:13	112:12 124:4	341:10 342:7	111:13 114:24
106:1,9,18	164:14 185:14	murder 116:14	names 63:21	115:10 117:14
MOHAN 2:19	201:14 250:6	157:8,16	206:2,17,19,21	118:3,17
Molly 131:19	279:10	158:15 303:3,5	224:9 333:11	119:23 120:14
mom's 215:9	months 71:15	303:13,15,23	337:14	121:1 122:20
219:14 326:12	82:22 92:13	304:9 305:18	narcotic 34:17	126:11 128:9
moment 132:1	304:19	murdered	57:10 182:13	130:4,17 131:3
137:15 169:17	Moore 150:17	219:10	narcotics 13:18	131:6 132:13
220:19 347:17	153:20 181:7	mustache	13:21 14:13	132:14 133:5
momma 333:24	186:18,19	337:15	16:24 17:12,17	133:15,17,19
money 14:7 31:3	187:1 250:1		18:9 19:12	134:13,21
32:24 33:10,16	286:8,8 323:11	N	22:14 25:21	135:19 136:1,7
33:18 37:13,14	339:7,9	N 2:11 3:19 5:1	26:18,19 28:16	138:17 139:4
72:6 75:10,17	morning 7:8,13	nachos 221:23	28:24 31:1,15	140:2,5 141:12
75:19,24 76:4	8:11 180:10	221:24	31:18,19 32:14	142:22 143:6
76:8,22 78:2	215:16 248:15	name 6:2,14,21	33:10,11 34:14	145:4,17
80:24 81:10	249:2 255:6	8:12,12,14	35:4 36:7,10	146:19 148:1
82:13 90:9	331:20 342:19	27:10,13 52:3	36:21 37:2,11	149:14 151:6
91:7 95:22	344:4 345:21	56:9 62:15	38:9 41:23	151:11,18
123:6 138:8,9	motel 178:22	67:22,22 68:8	44:6,11,17,18	152:4,19
138:10,14,16	mother 20:8	73:24 80:12,18	44:23 45:1,8	153:12,14,16
138:22 139:1,2	51:20,21 90:4	80:19 81:14,15	45:21 46:2,8	156:21 159:3
139:3,8,9,14	mother's 52:3	82:4 88:15,16	46:12,19 47:7	159:13 163:2
139:17,19	215:8 333:13	99:17,19 152:7	47:18 48:5,10	166:3,12,16
140:3 144:21	333:20 334:1	152:9,10 158:4	49:6,24 50:9	181:2 185:10
145:3 150:4,8	334:17,22	167:5 179:1	50:21 51:2	186:19 187:2,9
184:22 185:12	335:2 337:3	182:10 185:5	52:11 53:9,16	202:9,17
210:8,11,19,22	motion 200:14	202:6 206:1	57:1,3,9,15	205:11 210:19
211:3,12,19	200:15,17,18	207:1,9 261:4	58:9,11,12,19	210:22 211:21
218:2 219:22	321:2	261:6 275:8	60:4,15 62:5,8	214:24 217:2,6
219:24 220:4,7	move 23:13 56:7	278:8 284:3,8	64:21 66:19	217:17 218:3,8

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 375

223:3 224:1,6	299:20	Nichols' 226:24	number 6:9 8:15	36:12 37:1
224:14,21	negotiations	Nickerson	11:13 64:10	38:1 40:19
246:12,15	299:5	270:21	67:10 68:10	41:13 43:12
247:10,12,13	neighborhood	nickname 19:11	78:13,24 98:13	44:1,8 45:2
249:4,15,18	63:24	68:5 89:4	99:16,18	46:4,13 47:9
250:5,16 276:7	neither 182:22	323:1 338:22	101:19 105:13	48:12,16 49:8
276:20 277:11	203:14	nicknames 19:9	105:23 106:6,8	50:2,3,22 51:3
277:13,17	Nephus 2:16	29:12,14	107:14 108:21	52:12 55:11
278:6 279:14	nerve 203:10	night 155:23	113:23 115:19	57:19 60:7
281:6,11,13	never 29:19 55:4	178:17,19	117:17,19	61:1 63:10
282:17 287:12	56:23 60:16,17	179:4 333:23	119:8,22 124:2	64:4,8,11,17
288:7,8,10	72:24 77:9	nights 93:21,22	124:20,20	68:21 70:15
301:1,2,4,24	86:11 91:1	180:12	125:17 128:17	71:1 72:10
302:5 306:23	94:15 122:4	Nina 249:24	128:20 137:14	74:4,19 75:12
306:24 307:3	137:2,6,7,9,10	251:8	137:16 138:2	76:18 77:6
307:10,14,18	143:17,19	nine 304:19	171:13 172:18	78:5 79:3,20
308:6 312:5,24	157:6,24	Nodding 26:20	214:11 287:5	79:21 81:23
313:1 315:5,15	164:16 183:15	131:21 201:22	288:14 343:19	84:14 86:19
323:16,19	190:13 210:20	noise 167:9	345:24 346:1,5	92:8 96:17
325:13 339:19	211:8,10 214:4	Nooner 339:17	346:8,9,11,12	104:4,13
narcotics-rela...	214:7,7 238:23	Norgle 34:13,22	346:13	105:14 107:8
122:12,15,18	240:3,5 271:7	77:5,11,22,24	numerous 7:2	108:5,8,9,24
122:24 123:10	278:2 279:18	normal 280:22	34:14,17 77:21	109:21 110:8
123:19 124:2	282:15,16,18	normally 333:20	nurse 157:22	110:17 111:15
nature 209:19	284:20 293:6	north 2:3 3:14		112:1,12 113:2
Navarro 237:11	297:19 298:2	56:17,20	O	113:6,14 114:5
near 53:3 172:9	327:9 339:20	256:23 259:10	o'clock 178:17	116:2,19,23,24
243:8 273:23	342:5	260:1,1 351:9	oath 8:22 9:1	117:23 118:21
nearly 164:14	news 214:16,20	northbound	object 34:7	119:16 120:8
neck 330:18	214:22	258:24	95:17 172:15	120:19 121:2
need 9:9 25:2	newspaper	Northern 1:1	173:13 209:12	121:12,18
37:23 105:17	214:21	6:10 349:1	235:12 311:10	122:7 123:2,12
125:4 185:19	nice 93:23 94:5	350:1	objection 10:18	123:21 124:3
202:1 206:13	94:6,8 97:11	Nos 79:13	12:3,10 13:12	124:24 128:11
217:5,17	200:19	NOTARY	14:2,15,22	130:19 132:15
220:19 240:12	Nichols 142:6	349:23	15:4,10,15,19	135:2,22 138:5
240:23 321:6	222:19 224:22	note 105:24	16:2 17:3	138:18 139:5
328:3	225:2,23 226:1	108:24 113:24	18:11,17 19:16	139:21 143:11
needed 223:13	226:4 227:2,4	116:9	20:1 21:13	143:20 144:4,9
247:13 279:16	227:5,7,8,16	notice 1:12	22:1,15 23:1	144:15 148:5
needs 125:9	228:3,15,18	192:3	25:9,24 26:24	149:2 151:21
negative 335:15	229:13,21	November	27:23 28:7,11	155:10 158:21
336:13,19,21	230:13,13	170:2,23,23	28:18 29:1	166:17 168:8
337:1	231:18 232:9	201:15 204:22	31:5,11 33:12	168:17 169:1
negotiated	291:6,7,21	205:1 209:9	34:16 35:7	173:11 174:17

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 376

181:10 183:13	14:20	273:9,9 275:1	242:20 261:17	98:10,23 99:11
183:16 215:4	occur 18:16	275:2,4,8,11	266:13 271:24	99:13,20
216:20 217:10	135:4 236:4	275:17 283:6	284:5 298:3	100:23 101:1
217:10 220:10	338:3	284:1,12,13	309:8 326:9	101:11,18
220:17,21	occurred 126:15	285:4,9,10	332:21 341:3	102:2,11,16,19
229:5,5 234:4	239:4 336:23	288:20 289:6	341:17	103:13 104:2
238:19,21	337:3	289:20 292:6	okay 9:8 10:7,8	104:22 105:23
249:6 250:8	offense 46:19	292:17 294:1,3	10:10,11 11:3	107:3,13 108:2
277:2 280:10	47:19	294:18 295:14	11:5,5,9,12,16	114:21,24
280:10 281:17	offenses 34:15	295:17 296:10	12:21,24 13:10	115:12,18,24
282:8,22	34:17	297:11 333:3	14:7 18:8	119:8,13,20
296:14,23	offered 299:9,10	335:11,12,14	19:21,24 21:5	123:8 125:14
297:5,14	299:11,13	officers 7:6 8:15	21:11 22:6,13	127:7,10 128:2
298:18 300:14	office 7:23 35:15	11:13 81:18	22:18,22 23:9	128:17,22
305:23 306:5	35:22 289:13	155:20 186:11	23:13 24:2	129:21 130:11
309:16 310:18	289:24 290:21	187:5 188:23	26:13,14 27:8	130:14,16
314:7 321:13	291:4 292:19	188:24 189:1,5	27:15 28:5	131:8,11,16,24
323:20	293:20 294:6	189:7,10,14,19	29:9 30:6,14	133:23 134:20
objections 19:20	299:6 341:20	189:24 190:8	30:16 31:17	135:18 137:2,7
108:17 112:13	342:6	193:20 199:5	32:12,17 33:4	138:1,6 139:3
116:8 125:13	officer 98:17	204:8,14 209:3	33:20 34:1,6	139:18 140:8
220:16	99:6,7 141:2,5	232:8 235:5,15	34:13 36:24	141:1 142:19
objects 125:7	141:8,12	285:11,15	38:13 39:4	145:15 146:4,6
obligated 64:24	142:10 163:1	291:3,10	41:22 42:8,12	146:13,24
observe 136:13	164:7,7 165:19	292:16,22	44:11,17 45:7	147:5 150:11
145:12,17	165:19 191:7	293:24 294:23	47:1 51:24	151:11,18
203:23 229:13	198:16 199:6	313:9 327:8,10	53:5,16,20	152:2 153:19
250:16 264:21	201:4,8 203:24	329:20 331:2	59:9,20 61:18	155:5 156:6
observed 141:7	205:3,15 222:8	331:14,23	61:19 62:3	159:7,16
141:11 142:10	222:19 224:22	332:11,15	65:13 66:23	160:14,17
142:19,22	227:7,16	333:7,7 334:19	68:7 69:1,5,11	164:2 166:23
145:23	228:23 229:3	335:3 336:16	69:18 70:2,22	170:16,17
obtain 65:24	229:13 230:4	338:12,14	71:12 72:22	171:11 173:8
309:1	230:10,21	OFFICES 2:11	74:1 75:13	173:21 175:6
obtained 21:21	231:21,24	oh 19:21 22:6	77:6,17 78:17	175:16 179:14
21:21 65:23	233:8,12	34:20 35:6	79:8 81:10	180:24 182:7
78:11	234:17,18,24	71:4 79:21	82:6,11,18,24	183:11 184:19
Obviously 92:19	235:21 241:20	88:20 94:20	85:11 87:3,11	185:13,16
occasion 135:7	243:2 260:22	100:7,9 101:5	88:5 89:1 90:5	187:15,19,23
161:21	261:1,5,9	103:9 128:7	90:7,18 91:7	188:6,14
occasions 50:7	265:10,11	132:4 135:24	91:16,18,22	190:22 191:11
60:5 72:9	267:10 268:16	144:24 145:15	92:7,19 93:3,5	192:9,13 193:3
117:13 122:24	268:20,21	148:7 170:10	93:12,18 94:11	193:15 195:4
135:4 194:16	269:2,10,18,21	199:14 209:18	94:22 95:2,11	195:14,17
occupation 13:3	271:8 272:8,15	209:18 214:23	95:15 96:13	196:2,15,17,21

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 377

197:2,9 198:15	289:3 290:14	203:11,12,13	owed 76:6,21,22	315:20
199:13,14,18	290:19,23	300:8	Owens 341:8	paperwork
199:24 200:4	291:3 292:5	once 31:3 32:18	<hr/>	129:15 197:11
200:20,24	293:18 294:3	45:23 65:23	P	199:6 234:2,11
201:3,23	294:10,13,16	105:24 115:8	P 3:8 68:3	234:13 290:11
202:15,19	295:4 296:8	115:10 135:8	P.C 2:11	290:16 292:21
204:6,17,22	300:2,2 301:19	174:23 233:8	p.m 79:9,15	294:21
206:17 207:13	301:21 303:11	247:7 253:21	111:2,5 127:12	paragraph
208:6,8,12,21	303:19,24	274:12 285:14	127:15 132:6,9	103:1,6,10
211:6,23 212:9	304:17,21	317:16 336:9	185:24 186:3	173:3
214:2 215:20	305:6,11,15,21	one-man 311:4	268:3,6 347:18	paraphrasing
217:22 219:4	306:17 307:2	one-minute	348:2	137:21
219:14 220:7	310:1,9,17	110:24	package 309:12	park 20:21 21:8
221:16,22	311:16,18	ones 101:15	309:14	21:9 260:16
223:16,20	312:4,13,18	224:11 241:18	packaged 55:10	267:2,3,5,7
224:14 227:11	313:5 314:12	291:19 340:19	packaging 140:1	parked 254:18
229:11,23	314:14 315:3	open 228:19	140:6 227:19	258:19 272:24
230:4 233:17	316:22 320:7	271:9 274:3,8	packet 61:12	parking 176:7
233:20 235:14	321:10,23	274:9,9,13	page 5:3,13	255:18,18
235:21 236:4	322:12,17	327:5	99:22,23	256:1,2,9,12
237:20 239:11	324:16 325:9	opened 188:19	101:20 102:20	260:6,10,11,13
242:23 246:5	325:12 326:4,9	190:1 265:3	103:1 106:13	260:15,18
250:24 251:4,4	328:12,19	268:14 274:12	106:14 140:9	267:2,4,8,12
251:10,20	330:24 331:9	operated 146:5	169:24 171:17	283:2 285:8
252:2 253:11	332:21 333:13	operation 311:5	184:24 185:1	parole 154:4
254:9,14,23	335:10 337:11	323:19	pages 101:21,22	part 14:10
255:2,8,14	337:21 338:3	operations	paid 57:6 75:23	102:14 115:22
257:5,23	340:19 341:6	87:12 202:9	80:22 90:11	130:3 177:20
258:10,20	342:15 343:14	operator 6:3	95:2,13 141:1	179:9 199:8
259:19 260:2	343:18,23	13:5	141:4 340:8	210:9 273:4
260:14 261:8	344:3,10,16	opposed 251:15	pain 320:16	294:12 300:12
262:3,15	345:2,9,17	order 218:2	paint 245:15	302:4 306:16
264:14,21	346:2,22	ordinarily 187:1	painted 245:21	336:1,19
265:20 267:23	old 51:19 52:5	Osborn 341:12	245:21 246:1	participants
268:2,9,17,20	183:9,10	341:14,17	pajama 290:6	6:19
272:2 273:1	244:22,22	outside 31:22	Palles 2:19 7:9,9	particular 151:2
274:10 276:14	254:3 285:20	32:22 36:20	7:11,11 109:8	223:9 327:9
276:20,23	335:19	44:15,18,20,22	127:24 128:2	parties 350:17
277:16 280:8	older 18:2 30:5	46:7 58:15	272:6	partners 197:15
281:12,23	213:8,9 285:20	69:13,14,20	pants 244:24	pass 65:3 123:18
283:1,4,11	322:23	139:2 152:18	265:7,8 268:13	138:13 139:10
284:6,11 285:1	Ollie 2:16	162:22	290:6,7	139:12,12,13
285:13 286:10	Olympia 244:10	Overdose	paper 237:17	260:5
286:23 287:15	264:7	213:21	281:7,8 327:24	passed 34:12
288:18,24	Olympics	overly 125:9	papers 24:6,10	73:2 121:23

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 378

122:3 151:24	297:4 312:7,10	42:9 61:2 62:4	127:20,22	placed 192:24
222:13 285:2	334:1,4 340:3	107:18,19	128:10,16,17	places 53:12,12
327:23	340:13 346:1,4	108:17 111:21	128:18,20	56:8 58:14
passenger 56:23	paying 96:14	136:6 187:3	162:7,9,15	83:13 91:24
266:3	210:12,13	198:15 209:2	187:20 228:16	94:24 115:2
passing 122:21	334:2,3	216:8 239:9	252:22,23	plain 105:22
122:23 209:24	payment 71:7	240:10,19	346:1,4,20,21	plainclothes
240:6 274:21	122:1	241:5,21 242:5	346:24 351:11	327:11
Pat 167:10	payroll 150:11	243:15 247:4,5	phonetic 88:12	Plaintiff 103:2
177:4 336:9	223:6 224:11	275:10 316:1	201:19 222:20	103:16,19
pat-down	peace 201:19	321:24 323:9	284:4	106:8 108:18
289:17	peach 288:4	324:16 325:2	photograph	114:8 119:17
path 255:14	peeled 32:24	permission	343:16	125:7 140:18
317:14 319:23	penitentiary	217:5,8,17	phrase 144:23	plaintiffs 2:6,15
Patrick 4:4 7:22	304:1,18	person 7:6 51:11	280:21 281:5	6:23 7:20
143:7 145:18	people 18:7 20:9	54:14 56:2	282:16	98:16 214:11
146:7,20	93:15 123:18	62:5 63:1	pick 28:3 80:20	plan 270:15
147:23 149:7,8	143:2 150:11	72:24 117:20	80:21 173:22	planes 88:17,18
149:12,18,21	150:14 151:16	142:11 143:5	244:14 248:1	planned 161:11
149:23 150:1,4	157:5 167:5	202:24 203:1	253:2,23	plans 24:14
150:16 153:19	181:17 184:4	210:13 270:8	254:15 262:23	215:9
162:6,16,18,19	187:12 193:23	281:4,14,15,24	309:8 347:7	plant 141:12
162:22 163:1	205:5,7 206:7	305:17 308:16	picked 171:19	142:22 153:20
164:4 166:9,9	206:21 207:10	308:22 339:5	171:20 174:6	planted 142:11
166:15 167:2	214:19 218:21	341:4 343:19	255:15,16	143:6 145:17
176:24 181:7	218:22 224:4	343:21 344:8	303:13 312:18	146:20 148:1
250:3,7,16	224:10 240:6	345:17	pickup 44:5,7	plastic 55:13
323:11,15	247:9 248:21	personal 39:2	picnic 319:5	223:11 288:5
339:17	262:21 267:5	350:10	picture 343:1	play 149:6 267:7
patrol 293:24	270:21 277:12	personally	pictures 165:8	played 221:10
294:1	280:4 281:12	77:13,15	200:17	221:10 252:16
patrolmen	285:19 292:8	107:16 112:8	piece 66:13,18	252:20 294:12
293:22	322:8 323:18	112:23 211:8	71:11 72:13	playground
patted 268:13	325:18 329:15	persons 117:21	237:17 330:17	267:6
pay 31:1 33:18	335:24 337:8	pertaining 1:14	335:19	playing 136:3
48:1,3 69:24	338:11 340:5	69:9	pit 194:14,15,19	221:13 239:16
76:13 80:24	341:16	pertains 282:16	pitching 285:22	244:7 329:19
82:8,12,18,20	people's 178:5	Phillip 2:9 3:23	286:24 287:14	plea 158:2
90:12 91:10	262:19,20	phone 2:5,13,21	287:16	299:14,22
104:24 141:7	341:22	3:5,10,15,21	place 16:4,5	plead 299:18
144:24 150:1,3	perceived 243:8	25:12 30:9,12	36:4 52:20	pleaded 299:2
150:4,7,9	percent 278:8	60:24 61:7,8	86:9 161:14	299:15
210:5,13	291:20	65:2 67:7,10	169:8 172:9	please 6:13,20
211:13 218:2	period 16:12	67:14,19,21	190:22 196:24	6:21 7:24 8:1
219:1 248:21	21:19 27:1	93:14 127:19	320:10 350:13	8:12 10:5

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 379

44:11 100:6	236:20,22	253:15,16,16	private 133:3	proceeded
101:23 102:12	242:11,12,15	254:10	privilege 95:18	265:13 268:12
107:17 111:1	254:16,19,22	precinct 332:17	118:6,7,21	269:24 274:23
117:21 119:9	255:1,6,7	preliminary	privy 202:12	proceeding
120:15 123:2	258:10,11,14	331:22	229:22 234:22	298:5
pled 34:14,17,21	259:2 261:4,9	preparing	probable 132:23	proceedings 1:6
47:18,23	261:9 262:6	294:21	probably 56:4	6:24 7:4 49:15
158:11,14	275:7,9 276:1	present 4:1 35:5	84:3 89:16,17	64:2 77:21
298:8,12,17,22	278:20 279:22	43:10 108:18	101:14 128:24	214:12 349:6
301:13 303:17	279:24 280:5	134:12,15	132:19 175:17	processing
303:20 305:18	280:18 281:21	165:16,18	182:14 192:2	289:11
Plenty 116:8	282:19 284:23	167:2 267:9	194:15 197:7	product 95:18
Plus 49:2	285:3,15 286:2	297:16	205:12,13	118:7,21
plywood 335:19	286:10 287:23	presented 11:24	217:7 223:6	products 21:18
pocket 45:10	290:20 295:17	72:13	224:2 226:2	Professional
69:17 77:10	313:9,21 318:7	Pretrial 1:6 7:3	231:10 237:9	1:16 350:6
122:2 227:13	318:10 327:1,2	64:2 214:12	237:19 254:7	program 171:21
338:16	327:3 330:23	349:6	280:23 290:8	173:23
pockets 268:13	334:12 335:5	Pretrials 6:8	310:2 316:14	progression
point 32:7	Polo 184:5,11,16	pretty 123:13	338:20 339:4	241:23
109:11 111:22	184:20,21	previous 10:7	341:11 344:1	prohibited
165:10 185:20	185:3	previously 9:6	probation 47:16	59:22
201:4 221:22	pool 97:22	20:18	154:1,5,6,8	project 94:14,18
222:3 236:14	Pop 70:10	price 55:19	156:11,19,20	95:5,22 125:19
252:5 255:3	Popcorn 24:19	279:17	158:18 161:6	Project's 96:14
257:9	25:2	prior 27:20	164:6,6,9	projects 155:3
pointed 269:7	popped 338:7	33:13 51:4	211:24,24	promised 300:8
police 11:13	Pops 18:5,6 63:1	53:8 60:8	212:11,14	proper 64:18,19
18:19 81:18	223:14	65:14 74:5	246:8 299:13	property 145:6
141:12 145:7	portion 171:17	75:13 76:18	299:24 300:22	proportional
154:20 155:4	173:5 273:2	104:5 105:15	300:24 301:15	125:9
155:15 159:12	portrayal 76:9	109:22 120:8	301:24 302:2,3	prosecution
161:22 163:1	posed 17:5	121:18 138:6	302:4,10,12	60:13 129:9
173:10,17	possess 156:21	146:20,24	303:6,7,8	prosecutor's
177:15 179:8	301:6,8	147:2 163:16	306:20 314:17	299:6
180:17,24	possessed 316:7	213:15 263:3,5	314:18,21	Protection
185:14 188:19	possession 301:2	300:13 316:7	315:2,4,11,17	157:3
189:5,7 193:20	possibly 43:13	316:10 319:13	324:8,9,14	provide 48:5
222:7 228:10	308:6	335:2,10	325:20,22	58:18 87:8
228:10 229:8	Pow 317:13,15	prison 74:3,11	326:1	provided 85:21
230:12,15,24	317:24 318:3	74:24 94:12,20	Procedure 1:13	95:22 129:7
231:5,16,23	powder 228:1	96:16 97:3	6:6	131:13 138:2
232:12,18	310:7	116:14 304:21	Procedures 6:8	349:15
233:9,13,18,20	Powell 2:17	305:12 312:15	proceed 243:12	public 192:4,6
235:1 236:19	Prairie 253:14	315:13 325:23	256:1	349:23

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 380

pull 228:17 269:4,6,8,13 283:20	274:21,22 275:2,3,6,13 283:22 284:1	110:4,21 112:7 112:9,13,16,18 112:22 114:6,6	284:15	realized 262:14 really 37:15 38:4 70:19	
pulled 213:15 232:15 255:24 258:13,18,21 258:22 259:17 260:19 261:15 261:15 262:8 262:12 265:7 266:16 285:4	287:19 294:2 309:19 310:5 327:15 328:15 328:17 335:18 335:20 336:6 putting 134:12 134:21 135:18 136:1,7 164:8 198:22 285:5 336:20 338:8	115:22,24 116:3 118:6,8 118:20,22,23 119:3,5,6,9,14 120:4,9 121:11 124:20,20 125:1,3,14,15 126:2 128:4,12 131:12 134:6 138:18 139:5,6 142:20 146:24 147:3 148:4,5 166:18 168:9 168:17 173:13 199:13 210:10 211:1 215:4 220:14,17 238:20,21 254:2 276:14 280:11 282:8 299:9 321:13 321:17	R race 189:2 283:14 racing 329:17 Rainey 2:8 raise 184:22 185:12 299:4 Ramanujam 4:3 Ramirez 198:1 337:4,12,20 ran 225:11,14 225:14,14 226:2 228:6,12 231:18 257:11 Ranch 178:20 179:2,21 rank 199:21 rankings 218:18 218:21 ranting 233:10 raving 233:10 reach 164:21,22 read 68:16,16 69:8 100:3,3,7 101:2,12,14,15 102:17 103:2 103:16 106:13 106:16 107:14 107:24 108:13 109:16 119:11 125:3,4,24 128:3,5 130:1 140:15,22 169:12,18,20 169:21 170:19 171:3,17 172:15 220:20 173:15 234:10 reading 103:7 103:11 113:10 113:15 236:2 ready 153:23,24 real 318:22,23	realized 262:14 really 37:15 38:4 70:19 109:9,12 136:9 163:18 167:13 177:16 178:15 197:13 210:3,4 240:12 241:18 249:7,12 256:4 302:11 315:18 315:19 316:23 317:14 319:22 321:4 325:15 325:16,17 333:17 344:1 rearview 261:22 reason 84:4 93:13 105:21 137:12 159:16 177:21 206:11 206:13 210:5 280:17 reasonable 279:17 recall 15:13,22 18:14 27:17 29:5,10 30:10 35:10 36:4,23 44:14 45:19 46:10 65:20 69:23 74:7,8 74:15,20,22 75:9 77:18,19 78:13 81:14 82:17 83:9 88:3,14,16 92:15,18 115:11 126:13 126:21 127:1,3 127:4 128:15 129:18 130:22 137:11 145:21 148:13,24 149:4,5 151:17 153:18 154:16	
punch 330:11,17	Q	quality 70:19 quantity 136:11 quarter 248:3,4 253:5,5 question 9:17,20 10:19,20,22,23 11:2,3 12:10 14:2 15:5,10 15:17,19 17:4 18:11 21:14 22:15 27:23 33:13 35:2,7 36:13,14 39:5 40:21 41:14 43:13 44:2 46:4 51:3 57:19 61:1 63:10 64:4 65:1 68:21 70:20 71:1 72:10 74:4 75:12 78:5 79:4,20 81:24 96:1,3,6,6,17 96:19 97:24 99:12 101:22 104:2,4 105:11 107:9,10,15 108:2 109:3,14 109:16,22	questioned 113:21 169:4 170:18 questioning 64:18 105:6 168:13 questions 8:17 10:1,12,16,16 10:17 11:1,17 11:21,23 12:2 40:9 48:17 50:3 95:17,24 101:14 124:12 145:13,14 170:14,24 171:1,6 257:19 quickly 171:23 quite 42:22 58:4 63:23 210:14 253:15 263:19		
punches 329:7,8 330:13,14					
puppy 194:18					
purchase 45:21 76:16					
pursuant 1:11 1:12 6:6					
put 31:18,18 75:4 122:11 133:16,19 134:7,9 142:6 165:5,6,6,7 166:4 179:12 186:23 187:6,6 190:23 191:1,3 191:5,6,7,8,12 192:17 195:22 196:20 197:10 197:21 198:6,7 203:8 204:20 220:1 225:9,10 225:20 226:5 227:5,14 228:8 228:9,9 234:14 234:14,14,15 234:18 235:22 235:22 236:10 237:8,24 242:9 242:11,12,14 271:3,3 272:12					
pull 228:17 269:4,6,8,13 283:20	274:21,22 275:2,3,6,13 283:22 284:1	110:4,21 112:7 112:9,13,16,18 112:22 114:6,6	284:15	realized 262:14 really 37:15 38:4 70:19	
pulled 213:15 232:15 255:24 258:13,18,21 258:22 259:17 260:19 261:15 261:15 262:8 262:12 265:7 266:16 285:4	287:19 294:2 309:19 310:5 327:15 328:15 328:17 335:18 335:20 336:6 putting 134:12 134:21 135:18 136:1,7 164:8 198:22 285:5 336:20 338:8	115:22,24 116:3 118:6,8 118:20,22,23 119:3,5,6,9,14 120:4,9 121:11 124:20,20 125:1,3,14,15 126:2 128:4,12 131:12 134:6 138:18 139:5,6 142:20 146:24 147:3 148:4,5 166:18 168:9 168:17 173:13 199:13 210:10 211:1 215:4 220:14,17 238:20,21 254:2 276:14 280:11 282:8 299:9 321:13 321:17	R race 189:2 283:14 racing 329:17 Rainey 2:8 raise 184:22 185:12 299:4 Ramanujam 4:3 Ramirez 198:1 337:4,12,20 ran 225:11,14 225:14,14 226:2 228:6,12 231:18 257:11 Ranch 178:20 179:2,21 rank 199:21 rankings 218:18 218:21 ranting 233:10 raving 233:10 reach 164:21,22 read 68:16,16 69:8 100:3,3,7 101:2,12,14,15 102:17 103:2 103:16 106:13 106:16 107:14 107:24 108:13 109:16 119:11 125:3,4,24 128:3,5 130:1 140:15,22 169:12,18,20 169:21 170:19 171:3,17 172:15 220:20 173:15 234:10 reading 103:7 103:11 113:10 113:15 236:2 ready 153:23,24 real 318:22,23	realized 262:14 really 37:15 38:4 70:19 109:9,12 136:9 163:18 167:13 177:16 178:15 197:13 210:3,4 240:12 241:18 249:7,12 256:4 302:11 315:18 315:19 316:23 317:14 319:22 321:4 325:15 325:16,17 333:17 344:1 rearview 261:22 reason 84:4 93:13 105:21 137:12 159:16 177:21 206:11 206:13 210:5 280:17 reasonable 279:17 recall 15:13,22 18:14 27:17 29:5,10 30:10 35:10 36:4,23 44:14 45:19 46:10 65:20 69:23 74:7,8 74:15,20,22 75:9 77:18,19 78:13 81:14 82:17 83:9 88:3,14,16 92:15,18 115:11 126:13 126:21 127:1,3 127:4 128:15 129:18 130:22 137:11 145:21 148:13,24 149:4,5 151:17 153:18 154:16	
punches 329:7,8 330:13,14	Q	quality 70:19 quantity 136:11 quarter 248:3,4 253:5,5 question 9:17,20 10:19,20,22,23 11:2,3 12:10 14:2 15:5,10 15:17,19 17:4 18:11 21:14 22:15 27:23 33:13 35:2,7 36:13,14 39:5 40:21 41:14 43:13 44:2 46:4 51:3 57:19 61:1 63:10 64:4 65:1 68:21 70:20 71:1 72:10 74:4 75:12 78:5 79:4,20 81:24 96:1,3,6,6,17 96:19 97:24 99:12 101:22 104:2,4 105:11 107:9,10,15 108:2 109:3,14 109:16,22	questioned 113:21 169:4 170:18 questioning 64:18 105:6 168:13 questions 8:17 10:1,12,16,16 10:17 11:1,17 11:21,23 12:2 40:9 48:17 50:3 95:17,24 101:14 124:12 145:13,14 170:14,24 171:1,6 257:19 quickly 171:23 quite 42:22 58:4 63:23 210:14 253:15 263:19		
put 31:18,18 75:4 122:11 133:16,19 134:7,9 142:6 165:5,6,6,7 166:4 179:12 186:23 187:6,6 190:23 191:1,3 191:5,6,7,8,12 192:17 195:22 196:20 197:10 197:21 198:6,7 203:8 204:20 220:1 225:9,10 225:20 226:5 227:5,14 228:8 228:9,9 234:14 234:14,14,15 234:18 235:22 235:22 236:10 237:8,24 242:9 242:11,12,14 271:3,3 272:12					

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 381

172:10 182:16	315:16 325:20	102:21 117:18	30:11 31:21	report 145:5
184:13 186:16	recite 147:14	170:4	35:24 51:16,20	170:1,8 174:10
189:1,3,8,12	148:21	referring 37:1	68:14 70:9	232:3,4 234:8
189:18 192:15	recognize	126:15 141:18	74:17 75:3	234:23 235:5
193:21,22	260:22	142:3,4 271:13	82:16 88:7	235:10,15,19
197:8,14	recollection	332:6	91:24 95:1	236:6 288:2
198:18,19	175:24 263:21	refused 187:5	100:18 130:9	294:8,10,12
200:6 204:6	263:24 264:4	210:5	131:8,10 135:9	313:22
226:19 230:17	record 6:1,14,20	regarding 131:3	146:11 154:12	reported 171:2
233:16 236:13	14:3 42:14,17	131:5	155:22 158:4	350:9
237:15 239:2	79:10,16 98:20	Registered 1:16	159:7,23 160:1	reporter 1:15,16
245:7 247:5	98:24 108:24	350:6	168:13 171:20	7:24 8:2
249:16,22	111:3,6 127:13	rehabilitate	172:1 175:22	118:12 148:3
250:2 252:24	127:16,24	109:12	183:9 184:15	172:19,21
253:9 264:16	128:5 132:6,7	Reiter 3:18 6:24	186:7,9 188:6	220:19 339:13
269:19,22	132:10 140:16	7:7	201:14 204:16	343:10 350:6,6
270:22 292:2	144:16 186:1,4	rejection 73:12	206:20 214:24	351:2
292:15 301:20	220:20 268:4,7	related 8:17	215:6,24	reporting 8:3
302:14 308:21	343:4,15	40:7 110:16	221:13 222:4,6	164:9
308:24 309:4	347:19,22	119:20 120:3	222:9,11 228:8	reports 235:10
309:11 313:16	348:1 349:13	130:17 132:14	232:7 233:4	289:13
314:3 315:21	recording 6:1	183:3 298:6	234:9 236:10	represent 6:22
321:11 345:4	60:6 198:20	relating 257:19	244:6,7,23	7:1,15,17,20
347:9	recordings	91:12	245:13 249:20	8:15 141:20,22
receive 13:7,10	60:14,14,20	129:8 246:23	252:17 253:3	141:24
17:17 34:2	61:21	relationship	254:5 263:8	represented 7:2
36:21 38:9	recover 163:1	304:4	283:9,14	47:23 239:6
39:7 57:1	165:2	relative 350:16	287:22 288:5	298:15
75:10 78:2	recovered	350:18	288:12 292:4	representing
81:22 92:2	159:13 166:12	release 74:24	302:11 305:24	141:23
122:1 129:10	166:16,20	96:16 103:3,18	310:1 313:13	Republic 97:4,9
252:23 309:23	220:8	116:13 137:18	333:11,14,16	97:18
321:24 323:5	recovering	released 24:3	333:17 337:14	request 65:6,8
324:17,22	165:12	74:3,11 94:12	remembered	65:21
received 30:19	recuperate	94:20 97:3	171:22	requested 128:5
47:16 82:3	321:19	191:18 200:10	remind 199:12	220:20
86:15 87:4,6	red 44:5,7 246:1	304:18,21	remotely 7:11	rescinded 300:5
122:4 129:23	291:12	305:4,11	7:14,17	reservation
130:16 131:14	reduced 350:10	306:17 312:15	rent 341:20	161:17
138:3 139:8,19	reefer 338:16	312:17	renting 16:4,6	reservations
144:19 172:1,2	Reese 160:21	relevant 64:22	repeated 109:9	161:19
173:9 192:8	Reeves 81:8	124:7 125:8	rephrase 9:19	reserved 350:22
253:1 286:11	refer 18:5 22:11	remained 172:4	replacement	reside 39:14
301:15 312:8	62:8	remarry 24:14	203:19	resided 39:11
314:17,22	reference	remember	replacing 298:3	56:13

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 382

residence	86:5 117:4	102:8,14	183:5,6,11	271:11 272:18
133:10,14	118:3,17	103:15,22,23	185:13,15	272:23 276:2
134:13 136:8	133:11 135:19	105:3,4 106:5	186:6 187:10	277:14 282:7
140:2 171:18	135:21 140:2	106:12 107:4,7	187:14,23	282:15 283:2,3
171:24	255:17 256:14	107:22 108:3	188:14 189:9	284:11,18
residences 133:4	256:20,20,22	110:7 111:12	189:13 192:23	286:24 287:18
resides 20:15	257:2,6,13,17	111:14,24	193:2 195:14	288:22 289:4
residue 157:18	258:3,4,24	112:7,10,24	195:15,16,18	290:1 291:22
respond 199:16	259:19	114:19,22	195:20 199:11	292:2,13 293:1
response 106:1	Rickey 2:16	115:18 116:1	199:21 200:8	293:18 296:16
responses 98:17	ride 81:6,7	116:15,19	201:5,18	298:13,17
100:10,12	260:16 337:16	118:11,17	204:10,12	300:10,13
106:9,18	right 9:9,19	119:11,14,21	206:8,11,22	302:2,10
140:18	11:18,22 12:24	120:7,11,17	208:10,13,16	303:16 307:9
rest 177:10	13:1 14:1,8	122:6,13	209:6,7 211:13	307:11 308:24
201:19 232:17	15:3 16:1,13	123:11,19,20	212:12 218:5	309:22 312:13
232:19	20:4,23,23	123:24 124:8	218:16 220:8	312:16 313:5
restaurant	21:5 22:10	124:23 126:10	221:19,22	313:24 314:20
176:15	25:7,21,23	126:12 127:10	222:4,23 224:4	314:24 315:1,5
result 71:3,19	26:4 27:6,15	137:4,5,10,22	224:24,24	315:11,23
314:16	28:17 30:6,17	139:11,15	225:15,17	318:5,6 320:15
results 296:4,5	32:6 33:18,18	140:10,13,23	228:22 230:3,3	320:24 324:6,8
297:10	34:11,15 36:1	142:2,21	232:10,20	324:11,20
resuscitating	37:3,6 38:20	143:10 144:3,6	233:3 234:9	325:24 334:3
206:10	41:5,8,19	144:8,12,14,19	235:16,22	336:3,12,13
retained 5:20	42:11 43:24	145:1,11 147:2	236:14 238:11	338:9 343:2
return 167:15	44:23 52:8	148:2,23	238:20 239:4,8	345:4 346:4,10
174:7	53:14 54:7,9	149:15 152:19	239:14 240:4,9	ring 284:8
reunion 59:1,2	54:15,16 60:2	152:23 154:12	244:5 246:6,7	rings 22:20
reunions 65:19	60:6 61:6	155:19 156:21	246:12,13	risk 298:23
review 60:13	62:21 63:16	158:17,18,20	247:19,20,21	299:8
reviewed 100:10	64:1 65:10,21	158:24 159:2,3	249:1 250:22	Roberson 286:5
106:17 140:17	67:2 68:9,10	159:19 162:20	252:7,10,11	Robert 2:16
reward 234:19	69:11,20 71:4	162:22 163:24	253:7,19,20	154:21
234:20 235:6	72:1,5,15 73:6	164:1,17 166:1	254:19 255:17	Robinson 286:6
235:23,24,24	77:4,22,24	166:4 167:7,16	256:13,15	rock 310:8,9,10
236:2	80:10 83:7	167:20,22	257:3 258:23	310:22 311:2,8
rewrote 313:22	84:6,7 86:3	168:11 170:10	259:1,6 260:12	311:13,21,24
Rhodes 16:7,8	89:10 90:16	173:1,2,23	260:20 262:5,9	312:4,8 313:24
20:20 21:7,8	92:19 93:1,23	174:11 175:3,5	263:20 264:21	314:2
23:14 24:22	94:2 95:9,15	175:6 176:14	264:22 265:15	rocked 228:2
36:21 39:11,20	96:10 98:9	177:10,15	265:17,18	rod 321:1
43:4 48:10	99:6,16 100:1	179:16 180:14	266:1,3,15,16	rode 233:1
58:3,6,20 66:6	100:16 101:3	180:17,20	266:17 267:12	role 47:7 202:9
68:12 69:12	101:22 102:4,6	181:6,20 182:3	267:21 271:10	rolled 194:24

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 383

Ron 326:2	79:1 109:18	197:12,13	265:13,24	139:2 141:9
Ronald 3:12	181:2 224:6	198:21 199:10	268:13 269:24	152:18 153:20
7:15 155:17,23	San 94:14	207:18 218:21	274:16 289:17	156:3 162:1,1
room 17:9,10,15	Sanders 2:8	228:21 229:20	292:6 328:1	163:1,5 164:5
161:20 176:7	sandwich 36:3	230:2 234:14	330:7,8	164:7 165:6,9
190:21 197:10	Sanitation 161:4	234:20,21	searched 192:19	166:6,24 177:5
289:11 290:10	sarge 329:10	235:11 240:14	192:20 227:4	180:18,22
290:11,21	330:11	253:1 269:10	241:3 275:5	190:20 208:9
292:7	sat 329:11	280:3 292:8,8	283:24 289:16	209:17 213:18
roughly 18:1	Saturday	292:21 294:9	330:9	214:14,22
315:21	221:17	says 102:14	searching	215:2 222:21
roughshod	Saunders 2:8	103:16 106:11	190:12 265:6	222:22 224:21
187:6	saw 58:24 59:9	110:4 112:7	270:2 271:10	224:22 226:21
routine 33:9	59:11,17 63:17	116:16 125:7	289:19,23	227:1 230:20
Rowan 3:23	165:7,20	126:4 137:20	290:4 292:12	233:23 235:18
Roy 339:21,21	184:19 190:3	159:13 237:17	327:16,16,16	236:22 237:20
340:6	213:10,12,16	272:20 346:9	338:14,15	241:12 250:18
Royal 8:3	213:17 222:24	scale 310:5,13	season 23:18	254:15,19,22
RPR 351:9	223:1 224:15	scared 88:17,19	92:14,16	254:24 255:5,7
rule 26:10,11	226:20 227:13	97:21 315:6,10	seat 271:15,23	255:19 256:2
rules 1:12 6:6	227:16,20	315:14	329:9	258:10 261:8
9:15 109:13	228:3 232:20	scene 232:10,11	seated 271:16	261:12,22
run 165:12	232:23,24,24	232:16 283:6	second 19:23	262:1 270:5
225:24 262:21	233:5 258:11	283:18 284:13	71:21 72:14	272:17 273:10
278:22 279:23	262:8 270:6,8	284:14 285:11	103:12,15	273:12,21,22
280:1,16	271:7,12	289:21 330:22	113:20 151:4	274:11,12,13
281:21 282:1	275:24 284:20	scheduled 40:7	169:23 179:4	274:14,14,15
298:23 318:17	284:23 292:16	school 16:21	225:15 248:3	287:22 288:8
320:23,24	319:19 329:8	51:17 59:2	252:1 253:5	294:23 299:15
347:24	329:24 330:1,3	161:8,15	300:19 331:4	307:24 316:3
running 187:6	330:4 333:6	171:21 176:3	seconds 348:1	317:2 319:21
198:3 317:12	saying 70:21	177:20,24	sectioned 291:2	331:19 333:3,6
318:1,16	74:16,18,22	178:9 215:20	see 25:6 53:11	333:22 334:16
319:19,20,21	76:3 78:17	254:4,4 317:11	53:23 54:20	334:19 339:4
320:4	83:23 113:15	317:11 342:11	59:12 62:13,24	340:10,14
S	116:13 120:15	343:22 344:1	63:13 64:7	341:23
S 2:19 5:11 68:3	137:23 148:13	SCOLARO	66:13 69:5	seeing 156:1
S001437 169:13	157:23 161:24	2:19	70:4 93:9	233:4 304:5
S016405 343:15	164:16 165:4,5	scooter 338:8	98:18 103:13	seen 23:8,10
safety 192:22	167:11 170:13	Scott 2:8	103:20 107:22	53:10 55:4,5
327:15	173:17,23	sea 92:20	108:7,12	56:4 59:1,14
sale 22:14 46:2	174:14 176:16	Seales 341:6	115:16,22	59:15 62:23
57:9 139:4	188:15 192:7	search 190:18	117:24 118:10	63:15 69:9
sales 57:10 78:3	192:13 193:9	190:20 192:24	118:12 119:18	72:24 136:16
	193:22 196:6,8	262:23 263:1	125:22 138:24	139:16 156:1

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 384

163:3,6 213:13	322:13 323:8	September 11:7	shift 166:7	331:14,23
214:16,20,20	323:16 324:18	140:12	178:14	332:1,12,15,17
214:20 226:14	324:23	sergeant 146:3	shirt 269:3,11	343:7,14,18
226:16 239:3	sellers 224:10	198:1 210:21	273:9 285:10	showed 23:11
261:1,24 262:2	selling 23:10	210:24 211:3,5	288:20	62:21 238:14
262:17 283:6,9	26:19 34:8	229:3 239:19	shirts 329:21,23	343:1
290:8 319:4,5	35:4 76:23	240:1,16,19	333:9	showing 165:9
327:9 330:17	104:3,10	243:3 269:9	shit 190:5	344:3
330:18	105:12 107:7	275:10 328:20	240:11 270:6,8	shows 21:12,24
sell 14:13 15:22	110:19 120:14	328:21 329:3,4	271:24 330:7	68:12 345:5
18:10 19:12	128:8 144:13	335:3 337:2,4	334:2	shut 228:21,24
21:16,20,24	145:4 150:12	337:12,20	Shock 339:23,24	265:5 266:21
23:7 29:6	187:12 205:11	Series 329:20	340:1,2,8,23	335:20 336:7
36:10 41:12	207:8,11,12,19	serve 83:10	shoot 320:3	sic 16:8
46:11 50:20	207:24 210:6	217:16	shooting 157:7	sick 223:12
51:1 53:16	216:5,8,11,14	served 132:22	221:14 317:17	side 38:17 201:9
62:4 70:14	217:15 218:7	224:2	318:2,8,15	201:10,11,13
87:16 89:12	224:3 249:4	service 92:4,5	320:1,2,5,6,19	255:22 258:18
132:14 134:24	250:21,23	93:13 159:18	shopping 219:15	259:7,7,10,12
136:18 140:6	279:24 281:13	159:19,21	short 42:15	259:21,21,22
141:16 143:13	281:15 282:7	160:1,3,23	79:11 111:4	259:23 260:1,6
143:16,24	306:24 307:2	161:4 174:1,7	127:14 132:8	266:3 271:14
149:16,18,21	307:10 311:1	175:13 303:9	172:5 186:2	273:10,12,18
149:23 150:4	311:21,23	Services 8:3	268:5 330:5,15	273:23 274:5
181:5,7 182:1	313:5 316:1,5	serving 191:17	337:14 347:20	318:5
183:23 184:2,6	321:12 323:12	277:8 278:22	shorten 89:7	side-view
184:16 186:19	325:9,13,15,17	281:5,6 287:1	shorter 320:15	261:24
186:24 187:1,3	325:18	set 69:6 98:18	Shorthand 1:15	sign 237:17
187:5,7 202:11	send 332:23	99:21 100:11	350:5 351:1	255:22,23
202:17 208:2,4	sense 30:5	106:9 155:20	shot 157:4,5,6	256:15,19,20
208:4 210:8,11	216:24	342:6	202:5 221:9	256:21 257:10
210:19,22	sent 18:20	setting 131:5	254:12 315:19	257:11,12,13
211:3,21 213:1	129:23 130:17	seven 82:23	316:4,4,8,11	257:18 258:7
213:3,6 214:24	131:13 178:11	101:22 285:6	316:22 317:1,3	258:15 259:6,9
216:17 217:2,5	328:23 330:6,8	Shaking 92:6	317:4,6,8,15	260:7,11
217:17 218:2	sentence 103:1,9	shared 13:22	317:24 318:3	327:24 328:2
223:3 224:1,4	103:10,12,15	34:24	318:13,17,19	signals 256:11
247:9,12	103:19	shattered	319:9,14,21,23	signature
250:19 276:7	sentenced	317:19	320:2 321:6,12	140:10 350:21
276:10,16	212:18 302:23	Shaun 2:7	321:18,24	351:1
277:11 307:17	sentences 304:8	she'll 299:3	322:2 323:6,10	signed 23:21
308:8,14,23	separate 39:1	sheets 349:15	323:13 324:13	98:21 100:14
309:1,20 310:4	141:10 178:11	Shenault 2:17	325:7,12	100:18 101:3
310:10 312:4	196:3 281:4	2:17	show 23:6 71:5	102:9 107:3
315:5 316:16	304:13	sheriff 327:21	86:17 285:11	110:2 111:22

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 385

120:23 140:10	126:18 176:13	72:17 86:13	sounds 97:23	specified 350:13
140:12,23	337:8	145:8 152:15	162:14 167:9	speculation 43:14 46:13
signing 328:3	smoking 126:16	153:9 163:10	source 132:20	47:9 61:2
signs 256:22	127:5 136:3	163:12 182:15	168:22	74:19 81:23
257:1,5	snake 327:18	184:13 195:2	sources 137:17	84:14 92:8
Simple 105:22	SNAP 173:23	199:22 223:5	south 1:16 2:12	132:16 135:2
sir 13:18 41:4	snow 246:21,22	224:2 240:24	3:19 6:4 16:7,8	169:1 173:11
75:9 76:3 79:6	247:7	248:18 262:7	20:20 21:8	174:17 217:11
82:5 134:9	social 63:14	262:11 270:6	23:14 38:17	234:4 250:8
140:10 142:7	SOL 332:2	277:8 285:23	39:11 40:5,13	296:14,17,23
143:18 146:12	SOL'd 331:16	304:5 325:17	41:23 42:6,20	297:6,14
146:19 148:21	332:2 333:1,2	someone's 310:7	43:4,7 44:12	300:14
152:22 174:4	sold 13:18,21	son 46:18 47:2	45:7,21 47:4	speculative 105:6
187:8 210:10	14:6,7 15:24	48:6 49:22,24	48:15 50:8	spell 8:12 185:7
211:1 278:7	16:24 22:17	133:21 152:23	56:17,21 117:4	spend 180:12
306:7 309:4	29:5 34:1,11	178:2,4,5	117:8 253:17	251:17
343:18	34:21 41:7	213:15,20	256:23 258:2,5	spoke 77:24
sister 339:10	43:23 62:8,10	338:6	259:8,11,24	95:1 213:10
sisters 20:8	74:2 75:11	son's 213:16	319:5	spring 92:13
sit 46:1 78:23	77:2 89:9,13	337:10	southbound 257:17 259:5	spurts 213:18
87:3 148:12,23	107:20 108:18	Sondra 73:21,22	56:17,21 117:4	squad 196:16,17
163:23 189:9	113:24 114:9	sons 16:9,10	Sox 329:19	197:23
189:13 263:20	114:20,21	35:24 152:23	Spaargaren 3:17 7:18	Sr 2:9,17
287:7 336:3	115:1 138:11	soon 123:13	space 241:11	SS 350:2
sitting 113:10,15	138:17 143:9	185:20 317:23	267:2	stairs 222:13,16
190:21 193:8	143:17 144:1,3	sorry 7:21 21:1	spaces 267:4	222:22 224:23
199:6 205:18	144:8 149:14	21:5 102:24	speak 59:17	225:7,18
271:10,22	150:15 159:1,2	103:9 118:12	94:22 209:2,10	stairwell 225:8
290:24 326:24	181:20,22,24	126:22 128:2	219:2 229:14	313:17
six 101:21 179:1	182:5 207:14	130:23 133:23	specific 18:14	stand 32:23
303:22	221:11 227:22	135:24 154:22	107:17,18	209:24 230:19
skip 101:5	276:12,20	155:1 170:6	231:4,6,23	265:10,12
sky 97:20	278:2,3,3,3,5	183:11 207:23	233:8	268:15,20
sleep 177:13	278:10 307:13	220:19 229:5	speaking 116:8	287:8
sleeve 270:10	309:13 310:23	242:20 264:3	172:5 236:7	standing 59:14
Small 71:12	311:8,13 312:8	272:1 276:11	227:3 240:21	201:12 205:8
smaller 66:17	315:15,22	284:5 298:4	117:23 126:22	211:10 224:24
smart-ass 162:1	316:10,19	305:1 316:12	147:1 199:3	227:3 240:21
163:5 166:24	321:20 323:9	339:13	210:13 307:4	243:8 270:4
smelled 337:6	solicitation	sort 277:17	specifically	272:14,23
Smith 2:9 3:7	191:16	310:7 345:13	112:13,22	275:1 337:9
smoke 84:18	Soltesz 284:4,8	soul 176:15	116:17 146:6	338:8
127:7,8 333:17	somebody 18:20	sound 164:3	159:20 167:5	start 96:23
smoked 38:19	35:10,11 66:14	167:7 314:24	269:8 292:4	
93:7 120:5	66:22 71:17	315:1	335:23	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 386

178:9 265:6	252:1 260:20	206:14,15	38:23 39:6	substance
266:10 327:16	331:21	207:12,18	50:24 54:4	107:22
334:5	staying 179:3	211:14 225:21	55:22 56:10	substances 39:3
started 13:4	180:5	256:5 257:11	57:14 66:10	182:5
35:14,16,20	stays 32:7	258:12 260:20	67:21,24 70:2	substation
164:4 173:2	stealing 153:13	317:17 325:7	70:12 74:23	154:21,24
190:12 211:9	steel 153:6	stopping 257:9	82:24 87:5	155:1,6,16
211:17 234:13	stenographica...	store 17:1 48:10	89:20 105:8	189:19,20
240:3 266:21	350:9	82:24 83:2	120:23 124:18	191:18 196:23
304:5 316:5	step 62:21	86:9,12 114:24	128:7 129:6,21	197:3,6,9
325:8,9,13	222:17 225:1,2	133:17	133:13 135:6	198:16 199:1
330:10	225:2 265:14	stored 44:6	149:7 150:1,3	242:17 290:16
Starter 291:15	288:18 302:1	115:10 152:20	154:7 156:9,10	313:20
state 8:11 119:9	stepped 222:19	153:1,17	159:10 162:17	suburbs 87:22
120:15 216:12	237:11 317:16	storing 153:12	174:5 180:15	309:8
299:11 349:10	317:24	story 340:9	181:14 193:9	successful
350:2 351:2	steps 266:19	straight 185:19	193:18 202:19	103:18
statement	stickup 280:20	254:11 255:9	209:3 216:3	suffered 321:20
114:12	282:20	street 2:3,20 3:9	229:12 235:8	suggestion
States 1:1,13 6:9	sting 276:6	3:14 36:18	238:21 239:21	308:4
349:1 350:1	285:16 287:3	53:1 115:21	242:14 249:13	suing 8:16 11:12
stating 6:14,20	stolen 153:16	116:22 155:7	272:19 276:15	Suite 1:17 2:12
327:21	stomped 334:13	189:21 196:24	277:11 282:5	2:20 3:4,9,14
station 154:20	Stony 178:23	197:16 217:20	295:22 307:16	3:20 6:4
155:4,15	179:21	217:23 219:1	314:4 324:7	351:10
230:12,15,24	stood 196:20	255:17 257:4	330:24 335:10	summer 92:13
231:23 232:12	211:13 240:4	257:12,15,17	336:23 340:6	171:21 178:1,6
232:18 233:9	266:15 268:20	258:14 259:6,7	strong 206:5	178:7 188:13
233:13,18,21	273:8,20,22	259:8,9,10,21	stuff 21:17,21	summertime
235:1,15	stop 132:1	260:7,8 262:11	21:24 23:7,10	179:9
236:19,20,23	171:23 206:6	285:7 288:16	70:3 76:24	sun 31:23
242:15 275:8,9	230:8 233:24	317:24 318:18	130:1 157:22	sunburned 98:3
276:1 284:24	241:23 253:23	329:11,18,19	206:5 221:10	Sunday 163:20
285:3,15 286:2	255:8,22,22	329:21 332:19	232:3 244:9	163:22 221:17
286:10 287:23	256:8,14,18,20	332:22 333:3	329:13	239:15 247:19
288:8,19	256:21,22	351:9	Subject 108:16	Super 135:13
290:20 292:17	257:1,5,7,10	Streets 161:4	125:12	Superior 295:12
313:21	257:11,12,13	stress 320:12	subordinate	supervisor
stay 31:14 32:4	257:18 258:7,8	Stretch 41:3	243:4	199:18,20
178:23 179:15	258:15 259:6,8	strictly 110:3	subordinates	supervisory 7:6
179:17,19	259:9,11 260:7	113:9 117:7,10	211:6 243:3	supplemental
200:11 213:13	260:10 321:5	117:15	SUBSCRIBED	106:18
stayed 178:18	324:21	strike 9:23	349:20	supplemented
180:8 200:12	stopped 29:23	10:13,22 13:12	subsequent	98:22 106:2
237:6 244:13	176:17 206:9	15:17 36:19	302:7	109:1

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 387

supplied 65:13 171:12 183:22 184:2 200:17 308:23 339:20	184:10 191:22 191:24 195:5 204:5 205:12 207:15 210:14	31:19 69:16 86:8 326:24 tac 290:24 291:3 292:18 293:19	289:3,4,11 295:7 350:13 Talawrence 201:19	214:15 229:15 229:20 235:4,5 239:20 243:3 257:21 281:8
supplier 36:8,13 37:1,6,7,11 48:8 87:18,21 137:3,8 181:16 182:7,13,21 247:14,16 339:19	212:3,7,19 214:21 215:19 215:24 222:3 226:16 232:23 234:16 236:7 237:7,11,19 246:9 247:1	tactical 289:13 290:21 take 10:9 31:4,9 40:7,10 42:11 55:22 76:4 79:7 82:20	47:21 48:22 55:5 59:4 61:16 65:5,5,7 90:22 148:3 153:23,24 175:8 193:13	293:22,23 294:4,7 308:13 308:18 334:10 337:22 340:24 346:14,14,19
supply 18:9 40:18 45:11 85:11 89:14 129:22 183:12 184:11 202:17 308:17	253:15 254:11 257:23 263:19 277:23 282:3 283:16 284:15 287:5 291:9 302:14,21	98:13 99:23 101:18 102:19 105:23 106:12 107:13 110:24 115:13 117:17 119:8 124:8,17	199:18 211:23 219:14 226:11 228:18 239:8 244:5 300:18 326:5 345:23 346:23	tall 261:10 265:11 267:10 284:9,9 291:14
supplying 37:2 37:16 73:13 132:14 133:2 184:15 322:8	312:21 314:15 315:18,19 316:24 326:11 326:14,19	127:10 132:5 137:13 140:9 141:16 145:8 152:19 155:3	talked 36:6 38:19 40:7 67:11 94:23 129:17 174:21	Tameka 270:19 270:20,21
supposed 212:13,14 237:14 297:3	331:12 332:7 343:5 345:7	158:17 163:6 167:24 173:5 174:12 178:7	task 326:6,21 328:18,21	task 327:18
suppress 200:15	surname 68:1,2	195:2 196:15	tax 14:18 217:20 217:23 219:1	Taurus 2:9
sure 9:22,24 11:8 16:20 23:6 24:8 27:19 32:5 35:3,17 38:24 42:22 45:22,22 45:24 47:16,24 50:13 52:19,20 53:6,7,13,18 53:19 56:7,18 58:4,5,6 63:23 66:12 78:9,16 81:21 82:5,22 82:23 85:5,7 85:19 88:8,8 89:16 93:21 94:23 125:4 129:1 132:2 139:6 150:13 150:14 184:8	surprised 47:12 SUV 244:20,22 swam 97:20,21 176:11 SWAP 174:1,2 swear 8:1 swearing 196:13 swimming 161:9 162:10,11 176:4,4,8 sworn 8:4,8 349:20 350:7 swung 274:9 330:18,19 system 26:11	199:24 215:11 234:2 241:12 244:8,10 247:22 251:24 254:9,12 260:12 262:19 265:14,23 266:19 267:24 268:1 280:1 282:13 288:18 289:14 299:14 299:22 302:1 310:5 328:4,6 329:10 341:3 341:20 347:17 T	taxing 16:12 22:23 27:1 31:7,8 34:4 37:18,19 39:2 40:20 42:2 52:13 61:3,6 110:3,11 111:9 111:11,20 113:9,15,16,17 114:15 117:7 117:10,15 118:18 146:6 146:16 151:15 151:15 164:4 167:11,22 173:16 181:19 183:2 190:9,16 6:7,18 155:15 195:17 236:15 237:1 242:15 242:17 285:3	Taylor 154:21 team 110:13 141:21,23 142:16 155:18 156:4 167:4,6 198:3 199:4,8 205:16 208:9 209:11 210:9 210:12,14,21 211:2,3,19 232:3,6 239:19 240:1,10,16,19 243:4 290:24 292:3 294:4,12 326:2 334:16 336:2,19,22 337:2,18 340:17

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 388

telephone 68:10	285:7	103:12 104:4	220:15,21	230:18 278:7
172:2	tendon 317:18	104:13,22	229:5 234:4	278:11 295:7,9
tell 12:1,19,24	317:19	105:5,14,24	235:12 238:19	350:8
16:24 18:8	tenth 66:15	107:8 108:8,24	249:6,8 250:8	testifying 9:3
22:22 24:24	Tepfer 2:3 6:22	109:9,14,21	251:1,4 257:19	270:16
25:7 30:8,11	6:22 10:18	110:8,17	257:23 267:24	testimony 15:11
30:19 32:17	12:3,10 13:12	111:15 112:1	272:1,3 277:2	15:20 22:2
37:22 42:1	14:2,15,22	112:12 113:2,6	280:10 281:17	33:13 46:5
52:10 53:20	15:4,10,15,19	113:14 114:5	282:8,22 284:6	51:4 57:4 60:8
57:15 60:12	16:2,12,15	114:11 115:13	296:14,17,23	60:8 74:5
62:12 64:7	17:3 18:11,17	116:2,6,23	297:5,14	75:13 76:19
77:5,11 83:14	19:16,20,22	118:5,21 120:8	298:18 300:14	77:1 78:6,24
84:1 88:2	20:1 21:13	120:19 121:2,7	305:23 306:5	79:4 96:18
133:7 136:18	22:1,5,7,15	121:12,18	307:4 309:16	101:11 104:6
136:24 137:12	23:1 25:9,24	122:7 123:2,12	310:18 311:10	104:10,14
142:2 143:5	26:14,24 27:23	123:21 124:3,8	314:7 316:12	105:15 107:9
147:15,17	28:7,11,18	124:12,24	321:13 323:20	109:22 110:18
148:17 153:10	29:1 31:5,11	127:17 128:1	331:4 343:4,8	111:16 115:9
159:23,23	33:12 34:7,16	128:11 130:19	344:18	120:9 121:13
164:2 168:23	35:7 36:12	130:23 132:15	term 86:22	121:19 128:12
170:22 173:6	38:1 40:6,19	135:2,22 138:5	207:13 217:23	130:16 138:6
175:4 176:24	41:13 42:12	138:18 139:5	223:16 279:19	139:20 143:17
177:3 178:15	43:12 44:8	139:21 143:11	term- 241:14	143:20 144:15
199:9 202:19	45:2 46:4,13	143:14,20	terminate 212:4	149:1 158:14
203:10 205:2	47:9 48:12,16	144:4,9,15	terminated	173:20 174:4
208:8 222:4,6	49:8 50:2,22	145:14 148:2	212:2,3,5,8,17	175:21 183:16
255:14 257:10	51:3 52:12	149:1 151:21	212:18,20	187:8 203:16
262:3,22 267:8	55:11 57:19	154:22 155:1	terminology	204:19 209:13
270:13,14	60:7 61:1,14	155:10 158:21	192:2 241:14	210:7 212:9
277:19,21,24	63:10 64:4,8	159:4 166:17	terms 82:6	249:9,13
281:8 295:12	64:11,17,23	168:8,17 169:1	91:12 156:11	256:18 262:3
297:20 308:22	65:6 68:21	169:14,16,19	167:9 234:10	272:3,16
318:10 326:20	69:1 70:15	169:22 170:1,7	territory 306:13	277:16 279:18
332:13 344:10	71:1 72:10	170:10 171:1,4	test 66:14,21,22	282:4,9 296:13
346:2	74:4,19 75:12	171:6,9,11,14	70:3 71:18	314:8 325:24
telling 28:2	76:18 77:6,13	172:13 173:2	72:16 157:18	349:11,14
77:18 88:3	77:17 78:5	173:11 174:17	testament	Texas 97:2
96:4 119:6	79:3,8,20	179:6 181:10	299:14	text 130:5,7,12
142:20 158:7	81:19,23 84:14	183:13,16,18	tester 71:17	131:2,5
163:18 164:14	86:19,22 89:18	183:20 185:18	testified 8:8,22	texts 92:3 93:14
168:7 174:13	92:8 95:17,20	185:22 189:16	105:7 112:19	129:23 130:17
218:20 236:1	95:23 96:5,17	199:12 201:23	146:19 165:7	131:13
292:22,24	97:24 98:11,20	202:1 209:12	203:21 204:7	Thank 16:15
ten 18:2 38:7	98:24 99:3	215:4 216:20	295:14 296:10	226:9 343:8
78:19 185:18	101:21 103:6	217:10 220:10	testify 9:1,8,12	Thanks 242:22

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 389

Thanksgiving	124:6,6,7,14	114:15 118:18	59:12 61:2	226:14,17
200:16,22	126:13 129:20	120:3 172:2	62:4,24,24	228:16 229:3
208:23	130:9 144:24	206:12 261:14	63:15,17 69:18	229:11 230:5
theirs 192:22	156:16 161:1,7	262:7,11	71:21 72:14	230:20 233:14
327:15	170:13 173:2	318:18	74:13 75:7	234:16 235:9
theirself 141:16	178:22 191:21	thousand 221:1	78:12 79:9,15	236:5 237:2,3
176:8,9 218:23	193:24 194:2,2	346:22,24	84:19 88:15	239:2,8,9,11
325:18	196:23 200:14	347:5	93:23 94:5,6,8	239:19,22
therapy 320:14	204:5 212:6	threat 147:10	97:11,23	240:2,10,14,18
they'd 36:1	215:23 232:24	240:20	106:23 107:18	241:2,5,6,21
152:9	233:5 234:12	threaten 243:4	108:17 111:2,5	241:21 242:4,5
thick 337:15	237:6 244:16	threatened	111:21 114:20	243:15,15
thigh 317:20	244:17 245:7,8	240:18	116:15 117:7	244:3,15 245:8
318:4,5 320:13	246:9,10 248:2	threatening	117:18 118:19	245:12 246:8
thing 33:8 69:9	251:2 262:6	210:3	120:22 125:18	247:4,5,24
96:24 136:4	276:6 279:10	threats 241:10	126:7 127:12	248:11 249:22
148:12 164:10	283:16 285:20	241:15 243:7	127:15 128:7	251:12,17
186:9 215:6	286:1 288:4	three 16:9,10	129:23,24	253:3,7,9
236:10 237:18	291:8,8 295:11	93:15 171:19	132:6,9 136:6	254:3,21,22
267:18 270:23	300:22 301:23	172:7 179:16	137:22 139:23	255:5 262:4
274:2,6 279:20	305:13 316:3	179:19 203:13	147:2 148:4	263:4 267:8
318:11 326:4	316:23 319:3,5	225:5 248:9	155:24 156:15	268:3,6 271:9
327:3 330:10	319:6 320:1,5	266:20 300:8	161:5 162:8,12	274:11 275:10
338:15	322:24 324:15	304:19 326:23	163:17 165:11	275:17,20,24
things 97:17	326:16,18	threw 225:13	168:3 172:6	280:22 284:23
116:6 141:17	329:4 331:11	329:7	174:6 176:12	285:1,2,5
179:10 205:20	336:9 342:3	throw 330:13,14	176:16,17	290:2,5 292:18
205:23 209:17	343:24 345:20	throwing 330:11	180:11 184:19	298:23,24
209:19 210:2	thinking 24:8	thrown 329:8	185:24 186:3	299:3 302:8
327:20	162:24 179:22	ticket 191:21	187:1,3,7,15	304:1,14,14,15
think 9:2 10:5	204:20 256:5	192:5 256:16	187:22 190:10	304:15 306:19
28:19 31:9	260:19 302:21	time 6:11 9:17	190:15,17	307:13 308:21
39:15 47:16	330:5	16:12 19:14,14	194:10,11,18	309:4,5,10
52:6 56:15	third 222:14	20:11 21:19	194:23 195:11	314:19 315:3
58:5 59:14	third-floor	23:5,8,11 24:2	196:19 197:15	316:1,10,15,24
61:23 64:19	222:18 224:24	25:1 26:24	197:17 198:15	319:1,3,4,7,13
67:9 72:17	Thomas 2:7,9,9	27:21 28:23	198:17 200:14	320:10 321:24
75:15 76:12	2:16 88:13,20	29:5,10 31:21	200:21 203:6	323:9 324:1
80:9,9 81:12	89:14,21 90:12	33:6,6 38:11	203:23 204:17	325:2 331:5
82:14 86:21	90:22 91:3	39:24 40:16,16	204:18 205:1	334:18,19,23
93:20 97:10	214:6	42:2,9,13,16	208:22 209:1,2	335:9,17
100:20 101:8	thought 14:17	42:19 45:14	213:10,12	342:19 344:18
101:21 103:6	34:20 37:17	48:23 53:9,11	215:13,14	347:18,21,23
106:21,23	111:9,10	53:11,14 58:5	216:8 221:12	347:24 350:13
110:19 113:12	113:20,21	58:24 59:9,10	222:24 223:1	times 22:21

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 390

34:23 43:9	294:7 295:19	transported	trying 22:18	261:19,19
45:20 57:12	296:9 318:11	236:19 275:7,9	25:3,3 30:13	272:15 303:22
58:7 72:14	318:13 329:24	331:13	64:20 180:3,4	303:23 304:8
78:13,19,21	Toomin 164:10	transporter	184:22 185:12	304:13 314:21
79:1 85:20	238:7,7 298:12	236:18	187:6 200:24	315:1,17
86:15 97:22	300:12	travel 62:23	217:21 245:24	317:21
105:16 108:19	top 164:18	83:9 91:13,14	256:5 260:19	type 9:11 70:11
112:2 114:1,9	197:24 327:18	traveled 83:10	316:3 318:16	70:13,15 80:1
115:4 124:4	tore 313:22	treated 20:9,10	320:3,17	84:23 96:24
127:23 128:8	total 75:10 78:2	tree 142:17	325:16 329:18	157:12 159:17
141:15 146:8	347:24	trial 157:21	Turkey 200:19	160:22 211:18
198:9 208:16	touched 273:16	165:9 238:1,8	turn 47:1 256:13	227:19 237:18
218:7 233:2	town 25:4	238:11,13	256:13 257:8	239:1 246:8
335:11	Toya 27:12,12	239:4	258:9 260:5,11	274:4 296:5
tinted 261:18,20	27:13 43:6,10	tried 72:18	turned 46:24	301:4 313:1
261:21	90:5,6	327:24	129:4 262:16	319:12
tired 179:24	Toya's 27:13	trip 93:6,19 94:6	268:12,12	types 97:17
title 80:12,14	track 214:9	94:8 95:2,12	271:2 283:23	107:21
today 8:17 9:18	traffic 256:11,22	95:22 96:13	317:14 318:3	typewriting
10:4,9,12,15	258:17	97:1,17 178:9	319:22	350:10
46:1 67:7 87:3	trafficking	trips 96:16	tussling 330:11	typing 235:17
113:16 163:23	37:11	truck 44:5,5,7	TV 177:13	235:19 294:14
Today's 6:11	transaction	244:8 264:10	214:14,14,23	295:1,2
Toke 201:18	44:12 46:8	270:24,24	Twany 222:20	U
told 29:19 55:24	71:22 72:6	271:1	222:23 223:3	U-Haul 264:9
59:19 65:10	transactions	trucks 127:9	223:22,23	Uh-uh 340:24
76:2 137:2,6	36:7 52:11	true 12:15,20,23	224:1,14,17,18	346:23
141:4 153:1,5	57:16 58:12	66:19,20 77:23	225:22,24	Uhlman 1:15
163:3 164:6,10	60:6,15,20	100:12 106:19	226:1,3,11,14	350:5 351:9
166:9,9,10,15	64:21 67:8	114:17 140:20	226:17,20	Uhlman-Jones
166:15,20	69:7 70:23	211:20 276:21	227:8 236:22	8:2
167:19,19	72:2,3 75:2	311:14 349:13	237:21 238:17	ultimately 200:7
176:24 179:20	83:15 92:23	trunks 161:9	239:2,3	220:5 295:22
188:12 198:10	93:16 108:22	162:10,11	Tweet 29:13,16	295:24 298:5
205:4,4 214:4	111:13 119:23	176:4,4	twelve 251:19	300:9 301:13
214:7 225:9	122:22 131:6	truth 12:1 347:1	two 25:6 32:20	understand 9:8
228:20 241:23	150:20,24	347:3,6 350:8	32:23 35:24	9:18,23 10:1
247:22 258:11	151:6,12,18	truthful 9:9	59:2 72:1,8	10:17,19 11:1
265:3,9 268:17	transcript	11:20 101:16	80:4 122:23	11:4 21:14
269:6,13,13	349:11,13	103:24 114:4,8	124:12 165:13	22:18 29:2,4
270:18,19	transferred	114:11 126:5	186:15 189:10	36:14 38:24
275:13 286:1	123:7	197:18	189:14 190:23	40:20 41:14
286:10,21	transpired 38:8	truthfully 9:13	194:15 203:13	45:3,5 52:14
287:13,15,19	transport 79:19	try 106:23	204:7 212:13	70:16 96:6,19
287:24 293:6	80:16 84:6	173:14 317:14	212:15 227:10	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 391

112:16 114:6	user 19:19 20:4	verdict 81:22	226:6,9 242:19	330:4
121:11 137:22	41:9 54:2	verification	242:21 251:2	walked 167:10
139:6 179:3	uses 20:8	100:1,4,15	268:3,6 331:6	172:8 190:1
217:12 230:17	usually 262:19	101:3 106:13	347:18,21	211:14 244:4
265:23,24	281:15	106:14 140:15	videotaped 1:10	265:1,6 271:1
282:3 295:5	UUW 332:9	verify 106:17	view 270:5	271:2,5 274:20
321:14,18		140:17	violating 118:6	275:11 283:19
understanding		Vernon 39:16	violation 192:3	283:20,23
37:10,12	V 279:3,6,7,14	39:17,19,21,24	visibly 273:21	284:19,21
273:24	279:15,17	39:24 40:1,5	274:11	285:1,4 289:8
Understood	282:21	40:13 41:23	visit 26:8,9,12	317:22,22
101:1	vacant 115:4,5	42:6,20 43:4,7	40:16 43:18	334:7
underwear	151:6,8,10,14	43:10,18,23	168:1 241:1	walking 266:10
290:9	151:15 153:5,6	44:12,18 45:7	visited 304:6	266:13,14,21
uniform 197:24	153:10	45:15,21 46:9	326:6	266:23 267:15
269:11 327:11	vacation 94:11	47:4 48:15	visiting 326:21	268:10 333:22
327:12 335:7,9	94:15	50:8,14 58:2,4	voice 270:11	334:5,5
335:12,12,14	vacations 96:24	58:6,20 86:5	voluntarily	walks 276:2,4
336:17	97:2	117:8 118:3,17	265:15,17,21	wall 197:11
uniformed	valet 176:6	133:11,12,15	298:17	199:7 225:10
338:14	value 288:16	134:13 136:2,7	Vondell 2:17	225:10 232:2
United 1:1,13	van 197:23	139:4		289:14 293:12
6:9 349:1	244:11 247:23	version 98:20	W	294:2
350:1	264:9 278:24	versus 12:15	Wabash 346:4	want 9:15,22,24
University 95:6	279:1 335:5,17	20:5 227:24	347:7	10:4,6,9 30:6
unlawful 141:11	336:1 338:6	Vice 306:8,9,12	Wacker 1:16	36:8 38:24
unlawfully	vantage 165:10	Vicky 345:19	3:19 6:4	49:10 53:13
142:9	257:9	victim 318:7	wages 103:20	59:8 62:11,14
unsatisfactorily	various 108:19	video 6:2 60:6	wait 44:19	63:8 65:11
212:4,17	114:1,9 115:2	60:14,17 136:4	220:16 241:11	71:20 72:4,19
upset 49:2 83:24	116:6	video-recorded	242:1 243:13	101:18,22
196:11 198:21	vehicle 79:19	6:6,17 349:12	246:21	109:16 112:15
upstairs 169:9	80:1 84:23	350:9	waited 45:6	123:13 125:4
172:4 251:22	245:1,6 246:15	video-recording	252:20	128:3 147:5
252:9 255:4	247:4 262:6,12	6:3	waiting 333:18	172:13 179:3
use 20:9 39:2	262:23 263:4,9	videoconference	waiver 61:15	179:12 180:5
50:8 54:14	263:11 264:15	2:11,19 3:8,13	waiving 108:16	185:21 186:6
66:24 80:16	264:22 266:2,2	6:19	125:12	189:22 199:12
91:7 133:3,8,9	266:5 271:17	videographer	wake 223:21	208:21,21
133:13,14	295:7,9,24	4:2 6:1,16 7:24	wake-up 223:17	216:17 217:16
207:9,10,11,13	296:22	42:13,16 79:9	walk 240:22	221:23 231:1
246:18 247:3,9	verbally 253:21	79:15 111:2,5	241:11,24	239:10,18
263:14 264:15	260:18 319:22	127:12,15	251:24 252:1	257:23 265:14
264:17 310:3	verbatim 147:14	132:1,3,5,9	266:17 271:11	276:12 277:10
321:5	148:22	185:24 186:3	274:23 328:22	277:11,12

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 392

282:3 283:5	198:21 199:8	190:3,7,9,22	167:4,6 198:3	weekend 221:15
287:4,6 298:23	207:20 208:1	193:11,13,14	198:3 199:8	weekly 150:9
299:8,14,15	208:17 210:2	193:15,17,19	294:12 336:19	weeks 59:2
315:13 321:10	210:13 216:14	196:22 197:3	Watts's 137:14	weigh 310:15
338:4 341:1	216:14 217:3,3	197:20 199:20	155:17 156:3	weight 293:1
345:23 347:1,2	218:10,14	199:21,23	205:16 209:11	Wells 19:7 39:15
347:2	220:12 223:5	208:9 209:23	210:21 211:3	39:20 51:12
wanted 20:9	229:9,22	209:23 210:4	239:19 240:1	56:15,15,17,24
30:24 33:15	230:16,19	210:24 211:5	240:16,19	62:17 114:21
56:1 64:1	234:22 236:2	211:17 214:11	294:4 326:2	124:23 125:19
66:12,13,21,22	240:12 242:12	217:21 228:17	334:16 336:22	150:15,21,23
70:3 71:11,17	271:22 279:23	228:19 229:3	337:2 340:16	151:12 153:17
93:13 115:13	284:18,18	229:14,22	wave 59:20	158:20 159:3
124:9 131:12	295:6,13,21	232:8,15,16	way 20:7 23:4	167:16 173:9
152:18 197:21	296:11 297:13	233:17 234:15	44:14 50:17	174:8 175:12
198:5,6 253:1	297:16 303:17	241:7,18 243:3	65:11 67:6	202:10 205:11
308:7 347:6	306:12 319:15	243:14 256:7	160:23 163:24	210:19,23
wanting 24:17	325:15 330:9	261:16 262:14	176:23 179:15	211:4,21 217:6
33:6	332:18,20	262:18 264:21	192:4,6 198:10	218:8 249:15
wants 65:5	335:8	265:9 267:11	204:6 212:10	249:18 250:17
warned 124:9	watch 214:14,22	267:19 268:15	215:17 228:22	282:4,6,17,21
warrant 191:13	watched 177:13	268:17 269:7,9	243:13,14	306:12,14
warrants 164:11	watching 214:23	270:14 271:2,6	253:23 260:18	307:3 309:2,7
Washington	water 202:1	272:8,10,16,20	264:10 283:20	310:11 311:2
21:9	Watts 1:5 3:12	275:10,24	285:5 296:21	311:14 312:5
wasn't 9:5 16:16	6:8 7:3,15 64:2	284:20,23	318:3	315:5,22 316:2
37:14,16 39:23	110:3,7,11,12	285:1,10,24	ways 110:18	316:16,19
41:9 46:24	110:13,16	286:11 289:15	178:11	321:20 322:17
66:16 76:9	111:9,11,21	289:22 291:24	we'll 40:10 65:7	went 56:15
80:19 86:13	113:9,22 117:7	292:5,6,9,13	65:8 343:6	57:17 69:14,19
93:24 110:16	117:11,16	293:23 325:22	we're 27:1 58:22	69:20 77:3,10
121:6,10,15	118:19 119:20	328:16,22	99:1 179:10	90:14,18 91:23
132:13 137:1	120:3 141:19	329:5,15 330:4	257:21 326:22	91:24 92:12
138:8 152:6,6	141:20,22	330:15,18,19	326:23 327:2	94:12,14 95:11
156:5,7 165:11	142:2,12,21	330:19,21	We've 185:18	95:13 96:24
165:17,21	143:6 146:3,3	332:3,5,8,19	wear 291:15	97:1,19,22
167:12,18	153:20 155:23	333:6,22	320:17	122:2 135:11
169:10 170:14	161:24 163:4,7	334:14,15,18	weather 98:2	139:23 154:19
173:12 175:12	166:5,9,15	334:23 335:3,8	web@halemo...	161:8,8,9,19
175:18 178:13	167:3,5 169:12	340:3,20,21,23	3:5	163:17 164:6
179:23 180:11	171:13,22	340:24 341:22	Wednesday	168:2,3 172:4
181:5 188:3,5	177:4 178:13	342:17 343:15	200:21 208:23	175:7,15 176:3
192:6 193:15	179:12,22,24	345:14,15,23	weed 38:19	176:7,7,10
193:17,19	180:10,13	346:3,14 349:5	week 97:10	177:13,19
195:6 196:8	186:13 188:23	Watts' 140:19	188:6 212:15	190:21 194:16

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 393

195:1 196:3	216:19	57:21 60:10	282:23 296:15	336:17
200:3 204:9	Wilbert 339:7,9	61:19 63:11	296:19 297:1,8	works 95:8
211:15 212:4	339:15	64:2,5 70:17	297:15 298:21	world 281:5,11
225:8,18	Wilburn 2:17	71:2 72:12	300:16 306:6	329:20
228:18 229:21	William 2:15	74:6,21 75:14	307:7 309:17	worried 153:13
236:16,17	3:3 7:1 8:15	76:20 77:8,18	310:20 316:13	wouldn't 72:3
238:1 244:8,10	278:9,10	78:8 79:5,23	323:22 339:14	84:1 122:20
247:22 248:1,4	Willis 307:20	81:20 82:2	340:15 344:20	136:23 137:12
249:3,24 251:3	308:1,4	84:16 86:20	350:21 351:1	153:13 166:7
251:20,21	Wilson 4:2 6:2	87:1 96:8,21	witnessed	185:11 186:24
255:16 264:10	win 203:9	101:23 103:13	141:16,17	217:1 233:22
264:11 265:9	window 231:10	104:8,15	witnesses	248:22 260:5
268:14 289:22	270:6 274:6,7	105:19 107:11	238:18	276:23 277:10
289:24 290:1,3	274:14 338:6	108:11 109:5	woman 27:9	277:10,12
290:4 291:12	windows 229:19	110:1,10,22	94:4 204:9	287:13,14,14
291:18 292:12	261:18,19,20	111:18 112:17	women 189:4	293:4 298:22
295:11 296:9	windshield	113:7,18	word 106:24	299:3 303:7
304:1,23 317:7	261:21	114:14 117:2	147:17,24	310:6,6 323:24
317:16 319:23	Winky 221:23	118:9,13 121:3	wound 157:21	
319:24 325:23	221:24 270:22	121:9,14,20	165:12 321:21	
329:13 331:22	Winky's 222:12	122:8 123:23	write 287:24	
333:17 342:1	winter 92:13	124:5 128:14	289:12 329:24	
342:11 343:22	Wisconsin 178:8	130:21 132:18	work 36:1 56:3	330:3
344:1,2	withdraw 79:21	138:7,19 139:7	95:18 103:2,17	writing 82:11
Wentworth	witness 5:3 6:13	139:22 143:12	118:7,21	155:5 288:2
200:2,5 288:23	6:15 8:1,4,7	143:15 144:10	written 131:13	
289:8	12:6,12 13:14	144:17 145:15	wrong 12:2 13:1	
weren't 167:14	14:5,16 15:6	148:6 149:3	198:8 202:15	60:18 167:18
208:15 221:18	15:12,21 16:3	151:23 154:24	208:14 223:14	168:15 174:15
240:9 250:5	16:16 17:6	155:2,11 159:5	224:11 250:7	175:5 246:14
west 2:20 3:3,9	18:13,18 19:18	166:19 169:3	250:12 317:10	320:9,10
256:21 259:22	19:21,24 21:15	173:15 174:19	335:12 342:17	wrote 300:4
259:23	22:3,6,8,16	181:12 183:14	worked 36:3	313:18 330:1
wheel 337:10	25:11 26:2	189:17 199:14	208:12 223:4,6	330:20
338:7	28:1,8,12,21	201:24 202:2	223:7 232:3	
white 2:9,9 85:3	29:3 31:12	209:15 216:22	X	
245:12,20	33:14 34:19	217:13 220:23	X 5:1,11	
261:10 283:14	35:9 36:16	226:8 229:7		
283:16 284:10	38:3 40:22	234:6 238:22	Y	
291:17 329:21	41:16 43:16	239:1 242:20	y'all 203:8	
329:23 330:5	44:3,9 45:4	242:23 249:7	205:23 225:4,6	
333:9 335:5	46:6,16 47:11	249:11 250:10	225:7 256:15	
whoo 197:13,13	48:20 49:9	251:5 258:1	265:9 266:11	
wife 63:4 142:23	50:5 51:6	271:24 272:2	266:18 268:11	
170:5,17	52:15 55:12	277:4 282:10	268:15 271:9	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 394

292:24 295:8	175:23 177:1	281:23 285:20	107:18,20	185:14 187:12
328:23 330:6,8	177:17,22	286:12,15	144:8 203:12	195:4 204:23
yeah 18:7,23,23	180:3 181:3,21	287:1,4,17,19	212:13 278:12	205:2 344:23
20:11 30:3	181:23 182:4	289:5,7,10	299:8,9,11,19	345:6
34:4 35:18	183:7,7 184:13	290:13,13,17	300:4,5,6,9	05 211:23 216:4
37:10 38:18,19	191:21 192:7	294:20,22	303:22 304:19	239:14 244:5
38:21 39:18	192:12,19	300:1 302:3,19	314:21 315:1	246:5 250:15
40:9 41:1 43:2	193:4,6 194:6	302:19 303:14	328:5	250:15 283:3
58:7 63:8,15	194:20 196:1	307:1,6,6,15	years' 315:17	299:12
65:12 66:9,18	199:2 200:2,3	308:11,19	yell 280:4	08 80:9
67:15 68:11,13	200:9 201:18	309:6,21,24	yelled 280:21	084-004886
70:19 73:3,16	201:24 203:7	310:14,16	yelling 196:13	351:13
77:15 78:14	205:12 206:16	311:6,15	Yep 272:5	1
80:6,6 83:13	206:24 207:8	312:17 313:4	yesterday 98:22	1
83:14 84:19	208:7,11,20,24	313:10,12	106:3 109:2	1 5:14 16:7
86:4 88:6,14	210:24 214:18	314:1 315:8,12	Young 165:19	79:13 98:13,14
89:11,11 90:17	214:20,24	315:14,24	203:21,24	99:16,18
91:3 92:21	215:1 217:1	316:6 318:9	212:22 291:13	107:14 108:7
93:9 94:3,21	218:4,6 219:17	320:14 322:5,7	335:13	108:21 110:4
95:24 98:16	219:23 220:3	323:14 324:12	younger 213:8	113:23 216:13
99:2,8,10,22	220:19 221:15	324:24 325:11	youngest 178:2	1:00 115:14
100:17,22	224:9,16,23	325:11 326:7	Z	1:05 121:13
101:6 103:1,21	225:6 226:22	329:2 334:3	Zach 57:13 58:4	1:11 127:12
105:2 107:23	227:5 228:6,21	335:1,7 338:2	58:5 59:1 75:3	1:52 127:15
113:17 115:15	229:15 231:3	339:8,18,24	138:14	1:57 132:6
115:23 119:19	232:11,15,17	341:9,15,19	Zachary 51:9,10	10 101:19
120:4 122:9	232:21 233:10	342:9 343:5,5	51:15 52:3,5	102:12 105:13
124:14,14,19	236:1,16	344:9 345:7,14	52:11 53:17,21	239:10,23
128:1 129:17	239:17 240:14	345:16	54:2 55:3,7,20	240:15 241:6
129:20 131:10	244:2,21	year 11:9 80:7,8	55:24 57:6,11	241:22 243:16
134:1 135:22	246:17,20	82:16 94:17,20	57:16 58:24	254:7 263:22
137:23 142:1	247:18 248:17	107:17,19	62:3 74:2,14	264:4 305:14
142:12,24	248:17 249:3	119:9 120:15	78:3 79:2	305:16
144:22 145:2	251:5,23	120:22,24	10,000 82:14	
147:6 149:6	252:13 256:10	135:9,17	10:13 1:18 6:12	
151:3,9 152:3	261:10,14	145:20,21	350:15	
155:2,21	264:13 265:16	146:11 154:13	10:56 42:13	
158:10,12	265:19,22	213:12 300:20	100 291:20	
159:19 160:8	266:11,14,24	301:23 302:20	10th 263:7,9,15	
160:11,13	267:22 268:19	305:11 311:7	11 186:7 203:23	
163:21 164:24	269:15 271:21	336:11 345:4	204:1,2,11	
164:24 165:17	272:6 276:18	years 18:2 38:7	239:14 244:5	
171:3,3,12,14	277:10 279:2,4	51:19 67:12	246:5,24 247:8	
172:22 173:5	279:7,7 280:4	80:5 102:4,5	249:21 254:7	
174:3,16,20	280:7,23	102:14 107:6	257:22 263:3,5	

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 395

264:1,2 283:3	1998 108:19	181:15 182:7	38:21 74:3,11	63:18 67:8
298:6 299:12	114:1,10,18	182:12 183:22	75:1 94:19	79:18 80:2
11:22 42:16	115:1,9 144:13	184:3,6,12,16	2017 13:3,4,8,16	83:16 84:24
12 254:7	307:11,15	186:7 187:9	13:18 14:1,10	85:22 86:16
12:00 215:19	311:20	194:7,23	15:2,9,14,23	87:12,20
252:11,12	1999 18:1	200:22 203:3	16:14 17:1,18	108:23 109:19
253:10	311:23	203:23 204:2	18:8 21:20	110:16 128:9
12:05 79:9		204:11 208:23	22:14,24 23:1	128:23 129:24
12:16 79:15	2	209:9 324:22	23:5,8 24:18	130:5,18 131:2
12:52 111:2	2 5:15 105:23	326:18 333:13	27:3,4,17 34:3	132:12 133:4
12:53 111:5	106:6,8 107:14	334:17 335:2	34:5 35:13,16	136:13 170:2
12:58 115:14	115:19 117:19	337:3 347:10	37:3 38:9,20	170:23
120 3:14	169:24 171:17	2005 125:13	38:21 39:7,14	2020 319:7
130th 13:5	2 -23:15	126:2,11,15,19	39:22 42:9	2021 319:6,7
14 159:7,20	2,000 221:4	126:24 208:19	43:2 50:20	2022 9:2,3,5
163:16 167:16	2:00 132:9	209:1,10	51:2 53:14,21	2023 1:18 6:11
14th 165:20	20 76:6,15,21,22	212:11 215:7	56:6,13 57:1	349:12,21
168:24 170:13	100:15	216:3,5,8,13	58:18 61:5	350:14 351:2
170:14	20- 61:5	216:13 221:20	62:4,19 65:14	206 152:2,5
15 11:7	200 2:12	226:12,18	67:8 68:10	162:21 305:9
1600 2:20	2000 3:14 314:5	230:20 237:2	79:18 80:2	338:13 344:14
161 351:9	324:2	238:2 239:10	83:15 84:24	22 209:1,10
17 108:3 170:6	2000- 181:14	239:23,23	85:21 86:16	216:13
170:24 174:7	2000s 19:12 29:7	240:15 241:6	87:12,20 88:5	22nd 176:4
180:15,16	41:5 120:13	241:22 243:16	99:6,14 100:15	216:4
1717 1:5 6:9	315:23 316:2	249:14,17,21	102:10 105:12	23 208:19
349:5	316:20 324:1	250:6 254:3	106:1 107:3	211:23 212:11
172 5:17	2001 312:21	257:20,22	108:22 109:19	215:7 226:12
17th 170:15	314:5,11	263:3,22 264:1	110:15 111:13	226:18 230:20
175:12	2002 312:21	264:4,14	111:22 112:11	237:2 238:2
18 29:21	314:11 315:4	290:12,15	112:20 113:11	239:23 290:12
19 1:5 6:9 349:5	315:16 316:23	298:6 300:3	113:16,17	300:3 348:1
19- 127:6	324:8,16,22	324:17,19	119:18,24	23rd 215:24
1990 300:24	325:20 326:1	326:10,15	120:24 121:16	219:15 222:2,6
301:7,20 302:1	2003 194:19	2006 24:13	122:12 128:9	239:10 246:6
302:8	2004 108:19	194:17 212:19	128:22 129:24	300:10
1990s 308:13,18	114:1,10,18	239:4 325:23	130:4,18 131:2	24 331:7
308:23 309:2	115:1,9 144:13	2008 80:9	132:12 133:4	24th 24:13
309:13 310:11	146:20 154:1,4	201 2:12	136:13 140:12	25 223:11
310:23 311:2,8	154:8 158:18	2010 20:13	2018 39:24 40:2	26th 49:22
311:11,14	159:2,7,20	2012 30:1	42:9,10,20,24	236:17,21
312:5,9 316:17	160:4 163:16	2014 24:6	46:22 47:8	2700 3:9
1996 218:11,20	167:16 170:17	2016 11:7,11	53:17 56:13	28 170:2,23
1997 108:17	170:24 174:7	15:9,18 23:10	57:1 58:18	351:2
306:18 312:16	180:16 181:1	23:15 24:2	61:5 62:4,19	2nd 198:11

In Re: Watts Coordinated Pretrial Proceedings
Deposition of Ben Baker - Taken 8/9/2023

Page 396

200:1,2 288:22	36th 257:12 258:7,15 259:6 259:9,10,20,24 262:11 37th 196:24 255:17 256:20 257:4,6 260:8 221:6 3,200 75:16,21 3,600 75:16 76:9 3:00 161:7 162:13 3:03 185:24 3:13 186:3 3:30 251:3 30 274:16 30-something 331:21 3050 351:10 311 1:16 2:3 3:19 6:4 312.243.5900 2:5 312.341.9646 3:5 312.361.8851 351:11 312.372.0770 3:10 312.422.9999 2:21 312.427.3200 2:13 312.982.0090 3:21 33 3:9 337 3:4 343 5:18 35th 257:13,15 257:17 258:2,4 318:17,18 360 31:9 32:24 33:1 55:21 57:6 365 23:2	151:20 162:18 60603 2:21 3:10 92 302:22,22 3 162:21 171:19 60604 2:13 3:4 93 302:21,22 172:3 201:10 60606 3:20 93rd 178:22 201:12 213:7 60607 2:4 97 127:6 305:14 305:16 312:17 217:18 222:16 62-21:1 98 127:6 272:22,23,24 273:2 274:24 275:11 276:3 278:15 284:21 285:2 287:1,2 305:6 307:8,14 307:18 308:9 313:15 319:20 334:6 341:16 344:12 53 3:3 540 333:22 55 2:20 559 333:22 56 347:24 574 276:6,7,9,11 276:17,21 277:13,18 278:6,10 285:16,19,22 286:13,24 287:2,12,18 293:14 345:19 575 276:11 58th 253:14 6 6 137:16 138:2 331:6 347:24 6:00 180:9 342:20 344:4 6:15 180:10 6:50 347:18 6:53 347:21,24 348:2 60601 351:10 60602 3:15 6:5	151:20 162:18 60603 2:21 3:10 92 302:22,22 3 162:21 171:19 60604 2:13 3:4 93 302:21,22 172:3 201:10 60606 3:20 93rd 178:22 201:12 213:7 60607 2:4 97 127:6 305:14 305:16 312:17 217:18 222:16 62-21:1 98 127:6 21:3 23:14,15 39:11 66:6 117:4 278:15 284:21 285:2 287:1,2 305:6 307:8,14 307:18 308:9 313:15 319:20 334:6 341:16 344:12 7 7 106:1 107:3 140:12 7:00 156:16,16 161:4 178:16 79 5:14,15,16 79th 213:13,14 7th 46:22 8 8 5:5 8:00 161:1,3 178:17 248:14 800 56:15 819 220:1 866.786.3705 3:15 9 9 1:18 6:11 124:20,20 125:17 264:14 349:12 350:14 9:00 248:14 251:13 90 300:23 90s 120:14
----------------	---	--	--